



CCC Consultations &lt;consultations@canterbury.gov.uk&gt;

## Fwd: Consultation Response - Draft Canterbury District Local Plan to 2045 - Land at Grasmere Road Whitstable

1 message

CCC Policy <policy@canterbury.gov.uk>  
To: CCC Consultations <consultations@canterbury.gov.uk>

16 January 2023 at 15:25

----- Forwarded message -----

From: **Steve Davies** [REDACTED]  
Date: Mon, 16 Jan 2023 at 14:12  
Subject: Consultation Response - Draft Canterbury District Local Plan to 2045 - Land at Grasmere Road Whitstable  
To: [policy@canterbury.gov.uk](mailto:policy@canterbury.gov.uk) <[policy@canterbury.gov.uk](mailto:policy@canterbury.gov.uk)>

Dear Sir / Madam

On behalf of the Bartlett family, the Landowners of Brooklands Farm, South Street, we have previously submitted the two pieces of land off Grasmere Road indicated on the attached OS extracts for consideration for development in response to the SHLAA call for sites, however these sites do not appear on the mapping layer for submitted sites and have not been assessed in the SHLAA document.

It is noted that this land together with the wider area of land owned by my client in this location has been allocated for the provision of Green Infrastructure in accordance with policy DS19.

In the first instance we object to the allocation of my client's land at Grasmere Road, for provision as Green Infrastructure in accordance with policy DS19 in the emerging plan. It should be noted that the land has not been put forward by the landowner as being available for use in accordance with the draft allocation for Green Infrastructure. This land which is currently actively farmed by the landowner is identified by the adopted local plan as Protected Existing Open Space. In this respect the land fulfils only a visual function as open space, the active use of the land for farming precludes any wider amenity value, and public access is limited to the public footpath crossing the site. It's role is solely as a piece of open ground contributing visually to the openness of the area. Therefore without the co-operation of the landowner to promote the land in accordance with policy DS19 its allocation for Green Infrastructure would not achieve any change in this role. It is therefore unclear how allocating the land as Green Infrastructure would meet any specific benefit for the delivery of Green Infrastructure as envisaged in the emerging plan.

This land has previously been identified as Protected Existing Open Space, despite there being no public access. The role of the land in terms of policy OS9 in the adopted local plan is clearly restricted to that of the contribution it makes, as per criterion a. of OS9, to the visual amenity of the area. The emerging local plan gives no indication of any specific proposals as to how the enhancement of the land would be achieved so that it fulfils anything other than a visual contribution to the amenity of the area? The Draft Infrastructure Delivery Plan identifies no proposal for this land to fulfil its role as Green Infrastructure. Whilst emerging policy DS24 (8) relates to safeguarding publicly accessible open space, this land is not publicly accessible and no doubt for this reason has not been identified on the proposal map as open space to which DS24 would apply.

It is questioned how or why this this land has been defined as being suitable for Green Infrastructure provision in accordance with policy DS19 in the emerging plan. It would appear that the council has simply reconsidered all Protected Existing Open Space designations that are not publicly accessible for use to provide Green Infrastructure, without further

assessment of the availability of the land to be put to use for this purpose or of the nature of the allocation and whether it would actually positively contribute towards the provision of Green Infrastructure required by DS19. The council's approach by allocating this land would appear to simply to introduce a reason to restrict development in what is otherwise a highly sustainable location within the urban area. Therefore in respect of this site the policy is not positively framed.

On this basis, this land will not contribute towards providing the Green Infrastructure that policy DS19 seeks to achieve. Whilst it is recognised that an argument to safeguard the openness of the site could be put forward for the wider benefit of the visual amenity of the area, it would offer no more than this, policy DS24 seeks to safeguard publicly accessible open space, this or its use for the provision of Green Infrastructure requires the agreement of the landowner to stop farming the land and to allow it to be actively managed and used for more specific uses in accordance policy DS19. To my mind the allocation of this land for the provision of Green Infrastructure goes well beyond what the land can be expected to contribute as actively farmed agricultural land and simply seeks to introduce a manufactured reason to resist development in an otherwise highly sustainable location within the urban area. Neither the policy nor the plan are therefore positively prepared, justified or effective in delivering Green Infrastructure in relation to this site. The application of the policy DS19 to this site should therefore be reviewed.

Ideally, we would ask that the Green Infrastructure designation for this land is removed from this area of farmland as it will not be possible for it to fulfil the aims of Green Infrastructure provision envisaged by DS19 if it remains in agricultural use and continues to offer no potential for ecological enhancement or wider public access. Without public access the land should not as an alternative be considered as suitable for allocation as open space in accordance with policy DS24.

The land owner would be more predisposed towards the wider aims of the council in respect of Green Infrastructure provision and towards taking the land out of farming by removing areas of the land from within the Green Infrastructure allocation thereby making it suitable for consideration for windfall development within the urban area or by specifically allocating parcels of land for development. A smaller parcel of agricultural land would also be less efficient from a farming point of view therefore the landowner would be more likely be willing to consider other uses.

The crowned central area of the site currently makes the most contribution to the visual amenity of the area as open space. The lower areas of land adjacent to Virginia Road, South Street and Thanet Way are generally more closely related to the form and character of the surrounding development. These areas are considered more suitable for development. By allowing some development on these site frontages, it would be possible to tie these schemes in to the enhancement of some of the remaining farmland to provide a more focused approach to the delivery of Green Infrastructure, through the provision of environmental mitigation or BNG of the remaining undeveloped farmland as envisaged by policy DS19 of the emerging local plan. In addition the remaining farmland not required as part of the windfall development could be made available to other developments for the provision of mitigation and or BNG thereby delivering the overall aims of policy DS19.

In this respect Development in the area adjoining Virginia Road and South Street would readily be integrated into the adjoining residential development, with corridors provided to access the larger Green Infrastructure Area on the main body of the site. Likewise the frontage of the site to the Thanet Way could also be allowed to be developed in a manner that would allow contribution towards a more positive use of the undeveloped area that would remain behind it. The landowner would therefore support the allocation of their land for Green Infrastructure, on the basis that the two parcels of land identified in the attached map extracts are removed from the Green Infrastructure allocation.

There is therefore a great opportunity in this location to provide a positive enhancement to the provision of local green infrastructure, through linking it to appropriately scaled development in keeping with the local area. This will positively address the lack of effectiveness in the current allocation of the land to deliver any Green Infrastructure. As the reg 18 proposals for the land will simply result in the landowner continuing to farm by land, without the delivery of any Green Infrastructure.

We would welcome to the opportunity to discuss with officers, how the plan can be amended to achieve the council's intended aims for providing at least some green Infrastructure.

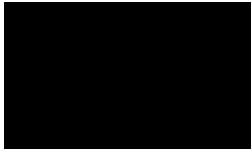
Kind regards

Steve

**Steve Davies BA (Hons) Dip UP MRTPI**

**Associate Director**

**Hobbs Parker Property Consultants LLP**



W: <http://www.hobbsparker.co.uk/property-consultants/>



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**2 attachments**



**South Street (003).jpg**  
132K



**Thanet Way (002).jpg**  
106K