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Planning and Development  
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7<sup>th</sup> July 2021

Dear Sir/Madam,

**REPRESENTATIONS TO THE REGULATION 18 CONSULTATION OF THE DRAFT LOCAL PLAN TO 2045 IN RESPECT OF LAND ADJACENT TO LAMBERHURST FARM, YORKLETTS**

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Iceni Projects, on behalf of Dargate Developments Ltd, welcomes the opportunity provide representations to Canterbury City Council's Regulation 18 Consultation of the Draft Local Plan to 2045 in respect of Land Adjacent to Lamberhurst Farm (referred to as 'the Site', SLAA ref. SLAA083).

Dargate Developments Ltd are disappointed that the Site was not allocated for employment floorspace, despite its suitability for the use and existing relationship with adjoining commercial development lying within Swale District. It is considered that the site presents significant scope for redevelopment/extension of the existing site. In account of the matters raised in the Council's SLAA, this representation seeks to address these matters in order to demonstrate the technical suitability of the Site.

The suitability of the Site is echoed by the allocation of a larger landholding directly alongside for employment floorspace within the Regulation 19 Draft of the Swale Local Plan; published after the Site was submitted to Canterbury Council's Call for Sites. Respectfully, Dargate Developments ask that the Site is allocated within the Canterbury Local Plan to reflect the aspirations of the neighbouring Borough Council, and that text is provided to create the opportunity for future growth in this location to meet a number of needs over the new plan period to 2045.

**a. Site Context**

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The Site adjoins the northern edge of the Lamberhurst Farm employment park, located near the built-up area of Yorkletts. The existing estate is approx. 2.4ha of B class uses, open space and car parks, having incrementally expanded over many years to accommodate a host of different businesses, the majority of which are highly specialised and require an on-site workforce. The existing site is fully occupied with no vacancies, which is a good indicator of further market demand for B-class space in this area.

The Site is also excellently positioned for its existing use, being located just 2 minutes away from Thanet Way (A299), which after 0.8km becomes the M2 between Dover and London. From Thanet Way, vehicles follow Dargate Road which leads to an unnamed road which provides access to the Site, whilst largely avoiding interaction with the nearby residences in Yorkletts. A petrol station and multiple bus stops are in Yorkletts and can be accessed via a 5-minute walk from the Site, however, if employees need to travel further afield, a number of services, including a train station, are in the nearby town of Whitstable which can be reached via an 11-minute car drive or by bus.

The topography of the Site slopes gently downhill from east to west. In terms of landscape considerations, the Site borders the Victory Wood Open Space, and without appropriate screening is visible from wider views, including the Blean Woods AHLV which is located approximately 350m to the northeast. Current Landscaping and Screening on the Site is in poor condition and an extension/redevelopment would therefore provide an opportunity to address these issues.

The only known Heritage asset is Lamberhurst Farm; a Grade II Listed Building. The Site is not within close proximity to any residential development or ecological assets that would be impacted by the proposed land use. Notably, the Site is outside of the Stodmarsh Catchment area which covers a significant portion of the District, and therefore would not be required to demonstrate nutrient neutrality. The Site is entirely within Flood Zone 1 and therefore has the lowest chance of flooding.

In summary, the Site is largely unconstrained from an environmental perspective and offers good scope to accommodate additional employment floorspace.

#### **b. Swale Borough Strategic Housing Land Availability Assessment (SHLAA)**

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As noted above, Lamberhurst Farm straddles the border between the Swale and Canterbury District. Accordingly, the Site was included as part of the Swale Borough Council's Call for Sites exercise to inform the evidence base for its Local Plan review.

The Site has been assessed by Swale, Canterbury City Council's neighbouring local authority, to be technically suitable and deliverable. The full extract of the SHLAA containing the Site is provided at Appendix 1 of this representation.

In respect to the Site, the Swale SHLAA states:

1. The Site is not considered to be subject to any high level constraints.
2. It is remote from the confines of the nearest settlement with a range of shops and services but is close to the facilities at the services on the A299 Thanet Way that offer various facilities.
3. The scale of the development would require investment in infrastructure that would support the sustainability of the Site.
4. It is well located to the strategic road network that would support further commercial development in this location.
5. The Site is considered suitable.

Given the above assessment, the Regulation 19 version of the Swale Borough Council Local Plan includes Lamberhurst Farm as an allocation for employment land (draft allocation ref. A5), as the Site plays an important role in providing a mixed portfolio of employment premises for established and new businesses.

Additionally, the Swale Employment Land Review (2018) recognises the scope to enhance the internal landscaping and layout arrangement that the extension/redevelopment of the Site would bring. Therefore, not only would an allocation help to make a more effective use of the Site and reduce impacts on the surrounding landscape, the extension/redevelopment will also create opportunities for new businesses, whilst allowing the existing small and medium sized businesses to grow and expand whilst not having to relocate elsewhere.

Accordingly, the principle of commercial development on the Site should logically be accepted and reflected in the Canterbury Local Plan. The direct responses to each of the matters raised in respect to the Canterbury 2022 Strategic Land Availability Assessment are provided below.

#### **c. Issues Raised in the Canterbury 2022 Strategic Land Availability Assessment**

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In July 2022, the Council published the SLAA to inform the list of draft allocations in the current Regulation 18 Version of the Local Plan. As set out in the sub-sections below, the issues raised in the SLAA do not affect the technical suitability of the site, nor do they align with the aspirations of the neighbouring Borough Council. Therefore, we respectfully request that the site is allocated.

## **Access**

The first issue raised in the SLAA published in July 2022 related to the uncertainty that a sufficient access could be provided to the new employment uses.

At present, Lamberhurst Farm accommodates premises for a range of businesses, including those which rely upon the use of HGVs. These businesses are extremely well placed in respect to the wider strategic road network, being a short distance from the A299 Thanet Way. From the A299, vehicles travelling to the Site take Highstreet Road for two minutes until reaching the Site access junction from Highstreet Road / Dargate Road. As such, the positioning of the Site means that there are minimal impacts towards intervening communities. This is mirrored in the Swale SLAA (Appendix 1), and the Site is scored as excellent for access in the Swale Employment Land Review.

The Site access road from the junction at Highstreet Road / Dargate Road is approximately 4m wide with passing places provided to allow for larger vehicles and HGVs to pass each other safely. Whilst the extension/redevelopment of the Site would lead to increased instances of passing vehicles, the extension/redevelopment is modest, and the existing road infrastructure could suitably accommodate this. As identified within the Swale SLAA, the extension/redevelopment of the Site would create scope for new infrastructure provision such as additional passing places, which would need to be identified through a submitted transport assessment and subsequently agreed with the Council.

Overall, it is considered that the issues regarding access are surmountable. By enabling the modest extension/redevelopment of the Site, it would provide additional employment opportunities in the area in a location that can take advantage of quick access to the Strategic Road Network whilst also remaining within reach of the District's key settlements.

## **Landscape Impacts**

In respect to landscape considerations, the Canterbury SLAA confirms that the Site is not within a landscape designation, nor an area of high landscape value which would require landscape character to specifically be addressed in any future application. It is noted however that the easternmost section of the Site is over 350m west of the Blean Woods AHLV and therefore it was considered in the SLAA that the Site may result in landscape impacts on the surrounding localities.

The existing site currently comprises a number of agricultural land parcels. Due to the nature of these uses, the screening around the field boundaries is significantly limited and in poor condition. As a result, the Site and the wider Lamberhurst Farm employment site is visible from afar, and its extension/redevelopment would result in landscape impacts if appropriate measures are not taken to mitigate this.

It is considered that a development on the Site could be designed to minimise adverse impacts upon the landscape and surrounding countryside by creating an appropriate and attractive buffer to the development. Moreover, this would significantly reduce the current visibility of the existing Site, whilst creating new opportunities for local biodiversity. This would be introduced through a sensitive landscaping approach, that would enhance and improve the setting of the Grade II listed building.

This opportunity is also identified within the Regulation 19 Draft of the Swale Local Plan, and requires the applicant to submit a Landscape Visual Impact Assessment which proposes measures to limit any landscape impacts. It is suggested that any existing hedgerows and trees should be retained, whilst a good variety and mixture of new vegetation is provided.

In summary, it is considered that there is a logical solution to the issues raised in the Site assessment in respect landscape impacts and subsequently that the mitigation measures proposed could be secured by way of a planning requirement as part of any future application. Dargate Developments has welcomed the suggestions given by Swale Borough Council and believes that the extension/redevelopment of the Site would entail significant landscaping benefits.

## Limited access to Services and Facilities

In the SLAA, the final matter raised against technical suitability of the Site was the number of services within sustainable reach and public transport options. It is considered that the approach taken to assessing the suitability of employment land should not be the level of services within sustainable reach, as the most important locational factors relate to accessibility to the strategic road network and nearby settlements.

The Site is considered to be in a sustainable location for employment uses, especially for its size. This is mirrored in the Swale Employment Land Review, which scores the site as 'excellent' for its accessibility. The site is within walking distance of a filling station and convenience store which also offers a café. The Site is c.650m from the A299 which provides access to Whitstable, Herne Bay and further east, as well as the M2 and Rochester, with London beyond this to the east. Whitstable train station is located 5km to the north-east of the Site. The Site is 5 minutes walking distance from a petrol service station, however, a number of additional shops and services are located c.3km to the north-east of the Site on the edge of Whitstable.

In terms of sustainable access to the Site, Yorkletts benefits from a bus stop which stops in Yorkletts multiple times every day, Monday to Saturday. This service offers sustainable access to Faversham and Whitstable where there are many services including trains to London. There are no dedicated cycle facilities on the nearby highway network. However, the Site is well within easy cycle distance of residential areas in western and southern Whitstable, via lightly trafficked minor highway connections.

As such, for a settlement of its size, Yorkletts a sustainable settlement due to its proximity to the larger Whitstable which can be reached via sustainable transport methods. Moreover, there are a number of larger sites already allocated in the draft plan, namely, SLAA259, SLAA090, SLAA137b, which have almost the same level of services within proximity to the Site subject of this representation and require around the same amount of travel to access day to day services.

In the Swale Regulation 19 Local Plan, draft Policy A5 recognises that the redevelopment/extension of the site may require improvements to the existing travel options, such as bus services for employees to both Faversham and Whitstable, which could be identified through a transport assessment and subsequently agreed with the Council.

The Site is therefore considered to be suitable for employment uses and the proposed development would strengthen the existing employment site.

## d. Summary

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The inclusion of the Site within the latest iteration of the draft Swale Local Plan demonstrates that the Site is technically suitable for the extension/redevelopment of employment uses at Lamberhurst Farm. This representation sets out a clear case as to why the issues raised in the SLAA, namely access, landscape impacts, and nearby services, are surmountable, and would not prevent a sustainable development from coming forward.

The Site is a clear and compelling opportunity for the extension/redevelopment of the existing rural business floorspace provision, in co-operation with a neighbouring authority which is supporting employment growth at a location which has excellent accessibility and clear demand. Accordingly, we ask that the Canterbury Local Plan be amended to reflect this.

I trust that these comments will be taken into account to inform the next revision of the plan, and that the value and importance of giving rural areas an appropriate share of the Districts future growth is recognised.

Yours sincerely,



Nick Pellegram

Assistant Planner