

Land West of Whitstable Road, Canterbury

Focused Regulation 18 Consultation -
Representations

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1. Introduction

- 1.1 These representations are made to Canterbury City Council's ("the Council") Draft District Local Plan (Regulation 18) Focused Consultation ("the Consultation Plan") on behalf of Hallam Land Management ("HLM").
- 1.2 By way of background context to these representations, HLM is promoting the land west of Whitstable Road (SLAA ref: SLAA 00176 – Whitstable Road) ("the Site") which is located to the northwest of Canterbury, to the west of Whitstable Road and north of Moat Lane and currently forms part of surplus Kent College land.
- 1.3 The Site is already known to the Council as the development potential of the Site has previously been considered through the recent SLAA process under reference ref: SLAA 00176 – Whitstable Road. The Council will also know the Site through representations which were submitted to the previous Regulation 18 consultations in January 2023 and June 2024 in which the merits of the Site were highlighted to the Council.
- 1.4 A site layout plan including a Concept Masterplan is provided at Appendix 1. Based on the concept masterplan, HLM considers the Site would be a small to medium allocation that can deliver approximately 100 dwellings and substantial open space within the first five years of the Plan period. The number of dwellings on the Site has been considered to accommodate an enhanced landscaped area and to address the Council's concerns regarding the purported impact of the development on the Green Gap and coalescence. Furthermore, noting the Focused Consultation has deleted the University of Kent land as a draft allocation (Policy C12), and as was proposed in the Regulation 18 Plan published in 2024, Blean Primary School will not be relocated as part of those proposals, and therefore additional parking (15no. spaces) adjacent to the vehicular access to serve the School has been reinstated to the front of the Site and is demonstrably available for the School, and recognised by the Council as a significant positive within the Sustainability Appraisal site scoring matrix. The proposed development of the Site can also deliver a safe pedestrian crossing over Whitstable Road.
- 1.5 These representations are further supported by landscape specific representations (Appendix 2) and a landscape and visual appraisal by Hankinson Duckett Associates (HDA) (Appendix 3), with a draft policy wording if the Site was allocated at Appendix 4. Plans showing the extent of the existing and proposed green gap and the proposed concept masterplan can be found at Appendix 5, 6 and 7.

Approach to the Representations

- 1.6 The National Planning Policy Framework (the Framework) states, at paragraph 36, the tests of soundness that Local Plan and Spatial Development Strategies are examined against, as follows, with the Consultation Plan being considered in the light of these tests:

"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

1.7 These representations respond to key parts of the Consultation, highlighting the specific policy, paragraph, or supporting evidence document being addressed. They are structured as follows:

- Section 2 addresses the development strategy’s housing need and the local plan period;
- Section 3 assesses the Focused Consultation Plan’s new draft allocations;
- Section 4 assesses the soundness of emerging Policy DS19 in relation to Green Gaps;
- Section 5 assesses the acceptability of allocating land west of Whitstable Road within the Consultation Plan;
- Section 6 considers the Sustainability Appraisal site assessment matrix; and
- Section 7 provides the summary and conclusions of the representations.

2. Development Strategy for the District

Housing Needs

- 2.1 As set out in the Development Topic Paper (2025), the Council identify a local housing need (“LHN”) of 1,215 dwellings per annum (dpa) for Canterbury over the 2024/25-2042/43 plan period (increased from 1,149dpa from the previous Regulation 18 draft Local Plan (2024)). This is a figure based upon the Government’s Standard Method, which is a minimum housing figure, and we are therefore satisfied this is correct at this present point in time. The increase is primarily as a result of the standard methodology now being based on dwelling stock data and a 5-year averaged affordability ratio.
- 2.2 The LHN will however need to be kept under review as the emerging local plan progresses to ensure it is based upon the latest available data. The Planning Practice Guidance then notes that the standard method figure can be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination in public (ID: 2a-008-20190220). We support the Council’s housing delivery approach, alongside the economic growth and additional investment in local transport infrastructure, which aligns with national policy and guidance.
- 2.3 The Council have a record of failing the Housing Delivery Test with recent scores of 67% in 2023, 75% in 2022, 65% in 2021, and 87% in 2020 and 2019, demonstrating not enough new homes are being delivered in the district. The Council is now without an up to date local plan which is a similar position for several other Kent councils.
- 2.4 In order for plans to be positively prepared, and therefore ‘sound’, the Framework requires unmet need from neighbouring areas to be accommodated where practical and consistent with achieving sustainable development (para 36a). The Council’s Duty to Cooperate Compliance Statement 2024, as was the case in the same titled 2022 Statement, indicates that each authority is working towards their own Strategic Housing Market Assessment, their own individual housing targets and to provide in full within their own administrative area. Whilst Statements of Common Ground have been agreed between the district and other local Councils, the Compliance Statement has not been updated at this stage, and therefore we assume the strategy has remained the same. Such matters will need to be kept under review.
- 2.5 With a 19-year plan period, the housing requirement for the Plan is 23,085 dwellings. Paragraph E6 of the Focused Regulation 18 Topic Paper (August 2025) states the total need is 23,085,129 over the Local Plan period and this should be corrected. Paragraph 62 of the Framework is clear that the LHN will determine the minimum number of homes needed and any unmet need within neighbouring areas should also be taken into account. The Council has made it clear that they will not be taking any unmet need from neighbouring authorities.
- 2.6 At E16 of the Focused Regulation 18 Topic Paper (August 2025), the Council states that it has 26,466 dwellings within the identified housing supply within the draft Local Plan, which results in a 9.8% buffer against the need (25,354). However, this is not correct. Against these figures, there would be a buffer of just 4.4%, which HLM considers to be inadequate and not a positively prepared plan.
- 2.7 However, it is assumed the figures at E16 are incorrect, as paragraph 7.15 (Housing Land Supply Calculation) states the draft Plan includes 25,354 dwellings against the need for 23,085 dwellings (with 24,406 dwellings in Table 7.3 (Summary table of housing land supply) made up from 2017 allocations, new draft allocations, planning permissions, windfalls, student and older persons permissions, and new allocations for older persons home) plus 950 completions (Table 8.6) (note. Table 8.6 is not found in the Topic Paper and the correct table is assumed to be 7.1, however there is no evidence to corroborate that 950 dwellings have been constructed in the 2024/25 monitoring period). These

figures do show a 9.8% buffer across the plan period. However, particularly given our assessment below of the new draft allocations N1-N33, which considerably reduces the supply, HLM consider that the supply and accordingly the buffer will reduce. It is also unclear whether the supply from the draft new allocations for older persons accommodation (369 total units) has been double counted, given that new major allocations include a proportion of older persons accommodation to be delivered already.

- 2.8 Therefore, without additional allocations to provide a robust buffer, the Consultation Plan is not positively prepared or effective as it is particularly vulnerable to failing to deliver the minimum figure set by the Government's standard method and accordingly would not comply with Paragraph 36 of the Framework. This is because the Consultation Plan lacks resilience against potential non-delivery of sites in general, such as under-deliver against the allocated numbers or delivery trajectories slipping. The Framework is clear the strategic policies should, as a minimum, provide for objectively assessed needs (paragraph 11b).
- 2.9 Accordingly, it is not considered the Consultation Plan incorporates sufficient flexibility to ensure the minimum housing requirement can be met over the plan period, particularly in the early years of the plan which would be contrary to paragraph 61 of the Framework which seeks to significantly boost the supply of homes. It is recommended the Council increase the number of site allocations to ensure sufficient flexibility exists.
- 2.10 With regard to small-medium sized sites, paragraph 7.24 of the Topic Paper (August 2025) indicates around 11% of the total housing requirement will be on small and medium sites (just 342 dwellings from draft proposed allocations). Noting the above and below assessments on new draft allocations, HLM consider there are a number of small-medium sized sites that are not deliverable and therefore should be discounted, as set out in Section 3 of these representations.
- 2.11 Noting the above, there are insufficient small-medium sized sites for SME housebuilders to contribute to the housing of the local area. Paragraph 73 of the Framework emphasises the importance of small and medium sized sites in contributing to meeting the housing requirements of an area, given they are often built-out quickly and generally lower in risk. The Council has considered paragraph 73a) through smaller sites, and the strategic includes allocating large strategic sites, but has not allocated sufficient deliverable SME sites of a medium scale.
- 2.12 Given all of the above, HLM considers that a greater buffer should be applied, with a particular emphasis on allocating additional sites (10-125 dwellings) to ensure needs are met in full and SME housebuilders have a continued housing stock. The Site at land west of Whitstable Road is a suitable and available site of this scale. Without additional allocations to provide such a buffer, the Consultation Plan is not positively prepared or effective and is particularly vulnerable to failing to demonstrate a five-year housing land supply and deliver the minimum figure set by the Government's standard method and accordingly would not comply with Paragraph 36 of the Framework.
- 2.13 HLM would emphasise that it is essential that additional small-medium sized sites are allocated at sustainable settlements such the land to the west of Whitstable Road at Blean to help meet the LHN in full.

Local Plan Period

- 2.14 The amendment to the proposed plan period, now covering 2024/25 to 2042/43, is noted. This revision ensures alignment with the Framework's requirement (paragraph 22) that plans must span at least 15 years from adoption, as the revised period covers 19 years.

2.15 The previously consulted plans commenced the plan period from 2020/21 and the change to the plan period results in a gap of four years (2020-2024) without a strategy for delivering homes, however, the standard method for the district does account for under-delivery in the prior years.

3. Focused Plan Site Allocations

3.1 Notwithstanding the comments above regarding the housing need, the Focused Consultation Plan allocates a number of new sites, which are not considered deliverable and therefore the strategy is not sound.

Land Availability

3.2 Paragraph 72 of the Framework states:

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for five years following the intended date of adoption³⁴; and b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”

3.3 Within the Annex 2: Glossary of the Framework, the government clearly defines ‘deliverable’ and ‘developable’ as follows:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a. *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)*
- b. *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Proposed Allocations

3.4 We have not assessed the deliverability / developability of each and every new allocation, but identify some primary examples below to demonstrate the sites that we would question are demonstrably unsuitable or undeliverable. These include residential garages, residential car parks, open space amongst residential areas, town centre car parks, old sports clubs and neighbourhood centres.

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
Policy N7 - Land at Seotamot	14	The Site is within walking distance to six services but this does not include a Primary School, Supermarket or Post office. Whilst it is within cycling distance of 18 facilities the SLAA notes ‘There is no dedicated cycle infrastructure in the	0

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p><i>vicinity of the site.</i> At the current time any travel patterns by cycle would have to be made on the highway.</p> <p>Furthermore, the SLAA assessment (ref. SLAA346) concluded the Site was not suitable for this reason stating – <i>‘Although there is a nearby bus service, there is no safe pedestrian and cycle access to the site from the wider area therefore future occupiers would be dependent upon private car to access day to day services.’</i> This is not in line with the modal shift strategy as part of the emerging Local Plan, raising questions to the sustainability of the Site.</p> <p>Whilst the Site has been allocated, the Policy N7 suggests the transport strategy is to link to future connectivity made by Policy N4. Policy N4 is a significant strategic development, which may take several years to deliver the necessary infrastructure to enable Policy N7 to be ‘safe’ to facilitate its delivery. The allocation should not be reliant on other developments coming forward.</p> <p>On this basis, it is considered the Site is undeliverable, but if brought forward should only be considered as a windfall rather than an allocation.</p>	
Policy N8 - Millers Field car park	9	<p>This Site is a very well used public car park (42 spaces) in the centre of Canterbury and enables access for those who are less able to access the city centre (those using wheels, such as due to disabilities or parents with pushchairs) and to support the function of the city centre.</p> <p>The Site is brownfield land (a car park), but is located within Flood Zones 2 and 3, an Area of Archaeological Importance and the Canterbury City Conservation Area. The Policy requires a density of 80dph and the constraints will be challenging to mitigate.</p> <p>The 2024 draft Plan also includes the replacement of car parks with residential dwellings and we recommend that this public asset, enabling access into the town centre should not be replaced on the basis of 9 dwellings and the allocation omitted from the draft Local Plan.</p>	0
Policy N9 - Land at Hawk’s Lane	12	<p>This Site is a very well used public car park (36 spaces) in the centre of Canterbury and enables access for those who are less able to access the city centre (those using wheels, such as due to disabilities or parents with pushchairs) and to support the function of the city centre.</p> <p>The Site is brownfield land (a car park), but is located within an Area of Archaeological Importance and the Canterbury City Conservation Area. The Policy requires a density of 80dph and the constraints will be challenging to</p>	0

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p>mitigate. The Site is also located off a very narrow road (Hawk’s Lane) and we question the accessibility for construction.</p> <p>The Site is allocated in the 2017 Adopted Local Plan and a planning application has not come forward for development on the Site. As such, we question the deliverability of the Site and would believe making this a new allocation would be double counting the Site.</p> <p>We recommend that this public asset, which enables access into the city centre is retained and the development of this car park seen as undeliverable as it would have already come forward if it was achievable. This draft allocation should be deleted from the draft Local Plan.</p>	
Policy N10 - Land at Military Road	180	<p>Whilst this is a brownfield site, this is the existing main Canterbury Council administrative offices. The SLAA assessment (ref. SLAA368) suggests that development is not considered appropriate in the eastern section of the Site (Realm Wood) and an additional 0.35ha area across the Site has been removed from the developable area to allow for the retention of trees, which leaves 2.53ha of apparent developable area at which the Council have assumed 88% of this could come forward for housing, delivering 180 dwellings without taking account of parking requirements, public open space and green landscaping.</p> <p>The current footprint of the Council building is approximately 60,000sqft, equivalent to a footprint of 0.56ha, at which the office is situated over 1 – 2 storeys in height. The Council’s assessment therefore includes a significantly larger area of the Site becoming ‘built form’, if the Site was to come forward across the existing built form area (0.56ha), the overall development yield on the basis of 80dph would be 45 dwellings.</p> <p>We acknowledge that the Site does include a significant area of car parking and other pieces of built form, which if included in the development footprint of the Site would be approximately, 1.6ha of land. On the basis of this footprint being built on at 80dph a scheme of approximate 128 dwellings would be achievable.</p> <p>We support a brownfield first approach but are of the opinion the development capacity assessment of this parcel of land is unrealistic and has been overestimated by approximately 50 dwellings.</p>	130
Policy N11 - Land at Long Meadow Way	5	<p>This Site currently consists of 20 residential garages, which are likely to be occupied and an asset used by a variety of people / businesses. Hallam Land would recommend that these assets should not be lost to deliver just 5 new dwellings.</p> <p>The SLAA (ref. SLAA362) concludes that <i>‘With the loss of the garages, parking and cycle parking will need to be provided in accordance with the Kent vehicle</i></p>	0

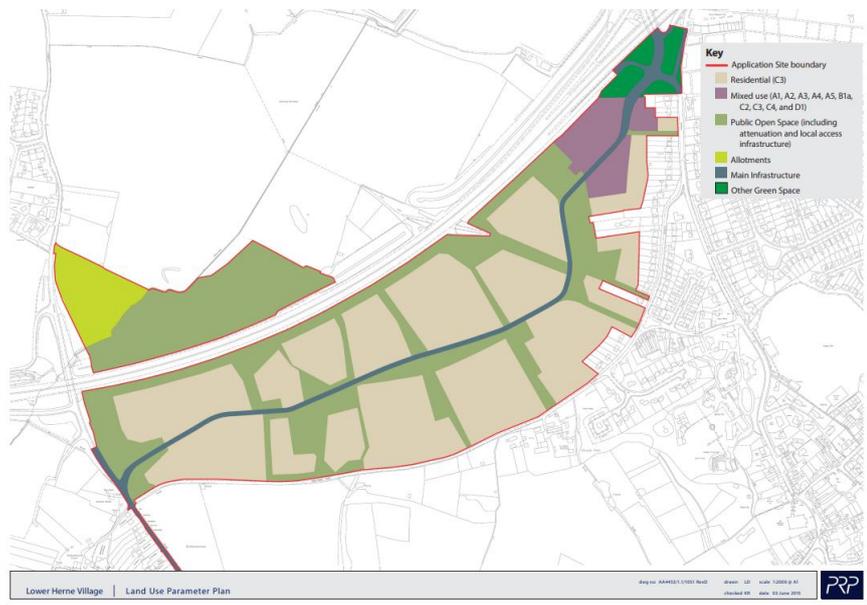
Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<i>Parking Standards plus some additional provision to cater for the loss of the garages on the assumption that some of them may still have housed a vehicle.</i> Therefore, the garages would need to be relocated and re-provided, however, this is not reflected in the Policy.	
Policy N12 - Land at Bawden Close	5	<p>This Site is a prominent area of open space within a residential area, adjacent to a mix of residential uses (flats, terrace housing) that have limited private green spaces and would look to this parcel of land as a useable outdoor green space. Any development would impact on the visual and residential amenities of the local residents.</p> <p>This area of open space is as an essential piece of community open space amongst the existing urban form in this location, and therefore is unsuitable for development. It is recommended the draft allocation is omitted.</p>	0
Policy N13 - Land at Copinger Close	6	<p>This Site is a prominent area of open space within a residential area, adjacent to a mix of residential uses (flats, terrace housing) that have limited private green spaces and would look to this parcel of land as a useable outdoor green space. The parcel is very shallow with two large trees on the southern side. Any development would impact on the visual and residential amenities of the local residents.</p> <p>This area of open space is as an essential piece of community open space amongst the existing urban form in this location, and therefore is unsuitable for development. It is recommended the draft allocation is omitted.</p>	0
Policy N14- Land at Jesuit Close	6	<p>This Site currently consists of 40 residential garages, which are likely to be occupied and an asset used by a variety of people / businesses. Hallam Land would recommend that these assets should not be lost to deliver just 6 new dwellings.</p> <p>The SLAA (ref. SLAA365) assessment fails to identify (as per sites SLAA362 – Land at Long Meadow Way and SLAA369 Land at Suffolk Road) that <i>‘With the loss of the garages, parking and cycle parking will need to be provided in accordance with the Kent vehicle Parking Standards plus some additional provision to cater for the loss of the garages on the assumption that some of them may still have housed a vehicle.’</i> Therefore, the garages would need to be relocated and re-provided, however, this is not reflected in the Policy.</p>	0
Policy N15 - Land at Suffolk Road	5	<p>This Site currently consists of 20 residential garages, which are likely to be occupied and an asset used by a variety of people / businesses. Hallam Land would recommend that these assets should not be lost to deliver just 5 new dwellings.</p>	0

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p>The SLAA (ref. SLAA369) concludes that <i>‘With the loss of the garages, parking and cycle parking will need to be provided in accordance with the Kent vehicle Parking Standards plus some additional provision to cater for the loss of the garages on the assumption that some of them may still have housed a vehicle.’</i> Therefore, the garages would need to be relocated and re-provided, however, this is not reflected in the Policy.</p> <p>The Site is also within the St Martins Hospital Conservation Area and a need to provide a large area for open space / biodiversity opportunities, which poses a constraint to the development.</p>	
Policy N16 - Land at St Stephen’s Road	18	<p>As the SLAA assessment (ref. SLAA370) alludes, there is an existing building, split into 6 existing residential properties within the parcel of land. The 6 properties are leasehold owners (approximately 89 years remaining), with Canterbury City Council being the Freehold Owner. These leaseholders are likely to have existing rights (as per the leasehold ownership) across the areas of land beyond the footprint of the building (i.e. the driveway, car park, garages and gardens associated with the property). The Council has suggested in the SLAA there is 0.17ha of land outside of the building footprint, but this area includes all the existing residential amenities mentioned above. The Site is also located on a prominent corner plot, surrounded by existing residential premises making a scheme difficult to deliver without impacting visual and residential amenities.</p> <p>We would suggest this is a not deliverable Site.</p>	0
Policy N17 - Land at Whitehall Close	7	<p>The SLAA (ref. SLAA371) describes the land as just garages, whilst this is correct (14 in total), the land also includes 10 residential parking spaces for the adjacent properties. Whilst the Council have suggested the 10 spaces will remain the Garages can be redeveloped to deliver 7 flatted dwellings.</p> <p>The garages are likely to be occupied and an asset used by a variety of people / businesses. Hallam Land would recommend that these assets should not be lost to deliver just 7 new dwellings.</p>	0
Policy N18 - Land at Sussex Avenue (Spring Lane Centre)	21	<p>This parcel of land currently includes the Spring Lane Neighbourhood Centre which currently opens Monday – Friday from 9am – 5pm, including associated car parking. Reviewing the community page, this neighbourhood centre looks to be an extremely well-used asset for the likes of Crafts, Stories, Tea/Coffee, Yoga, book clubs, baby and toddler groups alongside other events and activities. Whilst the Council is encouraged to actively seek out Brownfield sites, those brownfield sites should be redundant and not associated with such well used community assets.</p>	0

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p>By definition, the neighbourhood centre / community facility would need to be relocated and re-provided in order to be available. In the absence of evidence and inclusion within the policy, there are serious questions as to the ability to find alternative sites in the urban area.</p> <p>We would recommend this Site is deleted as a residential allocation and the appropriate community use retained.</p>	
<p>Policy N25 - Moyne</p>	<p>25</p>	<p>The SLAA assessment (ref. SLAA026) recognised that this Site was not suitable for a draft allocation for residential due to it being a Protected Employment Site within the Adopted Local Plan 2017. However, we recognise the brownfield first approach and should marketing information be available that demonstrates the employment use is no longer viable, then a suitable regeneration area could come forward within the emerging local plan.</p> <p>However, due to the land being on the inside of the highway bend of Margate Road, safe visibility sight-lines are unlikely to be achievable and access would need to be delivered through the already permitted development identified as Policy HB8 within the Emerging Local Plan for 67 dwellings, which is now under construction following planning permission CA/22/02513 which secured 67 dwellings (May 2023) on-site.</p> <p>Within the technical drawings (as part of the planning application – inserted below) the developer demonstrated a potential future phase (i.e. Policy N25) to connect into this parcel of land that delivered another 10 dwellings, which is significantly less than the 25 homes allocated.</p> 	<p>10</p>

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		The Council has overestimated the development opportunity deliverable across this Site, and the policy should be amended to reflect a more realistic delivery of 10 dwellings.	
Policy N26 - Land at Beacon Road	32	<p>During the Special Cabinet Meeting on 8th September 2025 to approve the Regulation 18 Focused Consultation Plan for public consultation, it was suggested by the public speakers that this facility prior to Covid-19 was a well-used sports complex, which has now been locked by the Council.</p> <p>It has further been suggested that the Council was transferred this land as a gift which contains restrictive covenants limiting the land uses, it needs to be confirmed whether residential uses are permissible without restriction.</p> <p>Additionally, the Adopted Local Plan (2017) identifies the Site as a 'Protected Open Space – Policy OS9'.</p> <p>The area of open space should be protected (as it is a key vision of the Council) and should be utilised for sports and recreation facilities to the benefit of the existing residents. If not retained, then the facility would need to be relocating and re-provided, and we question whether there are suitable alternative sites.</p> <p>We question the availability and deliverability of this Site and it should be deleted as an allocation.</p>	0
Policy N28 - Land to the east of Bullockstone Road	35	<p>As part of the SLAA assessment (ref. SLAA356) the Site was found not suitable as it is designated as a Protected Open Space – Policy OS9 within the Adopted Local Plan (2017). The area of open space should be protected (as it is a key vision of the Council), but the Council may wish to review the existing Policy and understand whether open spaces are now redundant.</p> <p>The site is circa 1.3ha in size, but due to the mature site boundary tree rows, which will need sufficient root protection areas, it is considered that the developable area within this parcel of land should be reduced to circa 0.75ha, which at 35dph, would deliver 26 dwellings.</p> <p>The Council has overestimated the development opportunity deliverable across this Site, and the policy should be amended to reflect a more realistic delivery of 26 dwellings.</p>	26
Policy N29 - Land at Home Farm, Strode Park	200	We have reviewed the SLAA assessment (ref. SLAA335) and disagree with the Council's findings that there are nine facilities within a 15-minute walking distance of the Site. It is recommended that the assessment should match the quantum of facilities found in SLAA assessment SLAA350 (Policy N30) – a Bus Stop, Pub and Vet.	0

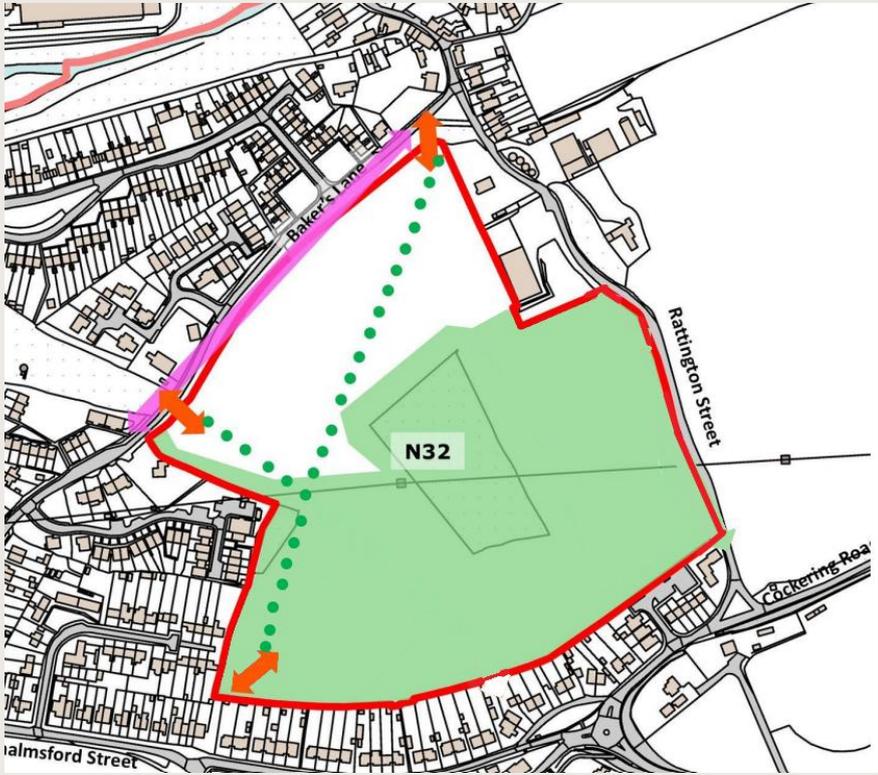
Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p>The Council appear to have assumed residents of this Site (SLAA335) could either walk along Lower Herne Road (which has no public footpaths) or using the ProW (which are unmade and unlit, and therefore unsuitable for any residents that should need to use wheels (wheelchairs, push chairs) and evening users). Whilst land immediately to the north of Lower Herne Bay falls as Policy Site 5 within the Adopted Local Plan (2017), this development does not plan to upgrade Lower Herne Road and instead delivers a new highway through the allocation.</p> <p>As such, pedestrian footpaths will not be provided or improved along the Lower Herne Road, nor the ProW, and the following assets mentioned within a 15-minute walking time will not be achievable or available (Primary School, Community Hall, Nursery, Recreational Ground, Place of Worship). Furthermore, Policy Site 5 does not deliver any additional community facilities adjacent to the Site (see Land Use Plan from permitted application CA//15/02782 – inserted below), with the new community facilities being situated to the eastern end of the scheme (closer to Canterbury Road).</p> <p>These new facilities would be approximately 825-850 metres from the edge of the Site, which is at the limit of a 15-minute walking zone, as such most of the Site shall still be well outside this 15-minute walking zone. Whilst Hallam Land would recommend that the Site is deliverable for development and shall soon be adjacent to the built-up area, it is not a sustainable location and will likely be a motor vehicle dominant development, which is not in line with the Council’s modal shift assumptions.</p>  <p>Hallam Land would recommend that the site identified as SLAA176 – Land at Whitstable Road, which has 10 facilities within a 15-minute walking zone</p>	

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p>(Community Hall, Primary School, Bus stop, Place of Worship, Post Office, Pub, Recreation Ground – the council failed to recognise the following other facilities being a nursery (The Oaks Nursery), Convenience Store (Premier Rough Common Store via PRow hard surface route CB30), Secondary School (Kent College)), would be a more sustainable site for inclusion in the Emerging Local Plan.</p>	
<p>Policy N30 - Land to the west of Bullockstone Road</p>	<p>50</p>	<p>The Council findings in the SLAA assessment (ref. SLAA350) identify there are only 3 facilities within 15-minute walking distance of this parcel of land, being a Bus Stop, Pub and Vet. This is demonstrably not a sustainable site, contrary to the Council’s spatial strategy.</p> <p>The Site is immediately to the West of Lower Herne Bay and Policy Site 5 within the Adopted Local Plan (2017), this allocation and now planning permission via CA//15/02782, will not improve the access to facilities and services, as these facilities are being delivered on the eastern end of the scheme, closer to Canterbury Road (see Land Use Plan from permitted application CA//15/02782 – inserted below).</p>  <p>These new facilities will be approximately 1,200 metres from Site, which will be beyond a 15-minute walking zone, and cannot therefore be considered to be a sustainable location and will likely be a motor vehicle dominant development, which conflicts with the Council’s strategy of modal shift towards walking, cycling and public transport.</p> <p>The Site is also an operational caravan park and the loss of the use would be contrary to emerging Policy DS11, which seeks to promote tourism, with part 4 of the Policy requiring clear evidence of need and viability to be submitted in the case of loss of visitor accommodation, and part 6 requires justification that the</p>	<p>0</p>

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p>use of the Site does not make any positive contribution to the local economy when considering the loss of existing touring and static caravan tourist sites. In the absence of clear evidence, questions are raised as to whether the loss of this Site will meet the requirements of Policy DS11.</p> <p>The Site is not sustainable and therefore should be deleted as an allocation.</p>	
<p>Policy N31 – Chartham Paper Mill</p>	<p>165</p>	<p>We support a brownfield first approach to development, but this Site is complex and the SLAA assessment (ref. SLA355) has recognised this, with the Site being contaminated, within Flood Zones 2 and 3 and partially falling within Chartham Conservation Area.</p> <p>The Council will be aware that a previous planning application was submitted (November 2017) and withdrawn in April 2018 (ref. CA//17/02633), for the redevelopment of the eastern part of this site for a total of an additional 66 dwellings.</p> <p>The application plan sought to extend the net development edge far further east (technical plan inserted below) than the concept plan outlined in draft Policy N31 (the Council shows the net developable edge terminating at the adjacent pumping station), which would mean approximately 35 dwellings in the withdrawn proposals would now be outside the Policy N31 ‘net developable area’</p>  <p>The Council have suggested that this Site should come forward at approximately 35dph, which would require 4.7ha of net developable area across the Site, however, taking account of the existing built area, we question whether this extent of land is truly available. Instead, the land appears to be approximately</p>	<p>0</p>

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p>4ha, which would reduce the deliverable units to 140 dwellings (a reduction of 25 units).</p> <p>The Site was marketed in July 2023 and sold to another landowner in January 2024, but we question whether the Site is truly viable for redevelopment due to the significant remediation and demolition tasks to be undertaken.</p> <p>As per the Emerging Chartham Neighbourhood Plan (Policy CNP21: Chartham Paper Mill), it is recommended the Site be included in the emerging Local Plan as a “Regeneration” site and should a deliverable scheme be designed, this is then worked up with the Council and Parish. However, due to the above reasons, there is no guarantee the Site is deliverable and should not be counted towards the Council’s housing supply but instead should come forward as a windfall site.</p>	
<p>Policy N32 - Land to the west of Rattington Street, Chartham</p>	<p>170</p>	<p>This Site was a parcel of land that was previously deleted from the emerging Local Plan 2045, as the Council considered other opportunities were more suitable.</p> <p>The Policy Map provided with the draft allocation includes several items which are demonstrably not deliverable, such as access to the south through third party land, and cycle and pedestrian improvements to Rattington Street. Rattington Street is an unmarked country lane which currently has not footpaths and whilst there is potential to include footpaths within the Site boundary (adjacent to Rattington Street), due to the land ownership restrictions on both the northern end of Rattington Street (into Chartham) and on the southern end of Rattington Street (onto Cockering Road) it would not be possible to deliver pedestrian footpath connections in these directions. The only achievable pedestrian footpath connection would be via Baker Street, raising questions as to the sustainability of the Site given many of the facilities in the settlement are to the north.</p> <p>The SLAA assessment (ref. SLAA110) identifies several further constraints with the parcel of land, such as the central Ancient Woodland, which due to its isolated nature, will be vulnerable from development encroachment and Policy N32 essentially suggests surrounding this isolated woodland on all sides.</p> <p>The SLAA suggested ‘Access is likely achievable. The submitted Transport Statement indicates primary access from Baker’s Lane with secondary access points from The Crescent and Rattington Street.’ Following a review, we would agree the most suitable access is from Bakers Street and that secondary access points from The Crescent and Rattington Street are both unlikely to be suitable as a result of highway safety concerns, including the location of adjacent junctions, the narrow roads and the lack of achievable visibility sight lines due to road bends, topography and hedgerows. This is recognised in the SLAA ‘There will</p>	<p>100</p>

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		<p><i>be issues to the local highway network to be mitigated, such as narrow roads and constrained junctions in the vicinity.'</i></p> <p>The SLAA further acknowledges the impact the development would have on the wider landscape, primarily due to the raised topography, which offers views into the wider landscape <i>'Landscape: Some wider viewpoints would be affected by the development, especially to the east where there is open countryside, but given the character of the village surroundings and the size of the site, it's considered that there would be opportunity to provide open space and landscape buffers to mitigate some of the impact on the landscape.'</i> We would recommend that development on the eastern part of the Site (adjacent Rattington Street) should be deleted, thus removing any impact on the wider views to the east of the Site.</p> <p>It is considered that parts of the Site are undeliverable and the Council has overestimated the capacity of the Site. We would recommend that the proposed developable areas are limited to the northern part only (adjacent to Baker's Lane) and at an area of 2.85ha and density of 35dph, the scheme would deliver approximately 100 dwellings. This aligns with the quantum of homes promoted as deliverable by prospective developer of the Site.</p> <p>We suggest that the Policy is revised to deliver 100 dwellings on the northern edge of the Site adjacent to Baker Street, which will remove many of the impacts to the surrounding area (highways, landscape and ancient woodland) which have been with the drafted allocation for 170 dwellings. A revised concept plan for the draft allocation could be as per the below plan.</p>	

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
			
<p>Policy N33 - Land at former Spires Academy, Hersden</p>	<p>37</p>	<p>The SLAA Assessment (SLAA342) suggests that the Site is within a 15-minute walking distance of six facilities (this does not include a Primary School, or Convenience Store). We question whether this is truly achievable as there are no pedestrian footpaths adjacent to the parcel of land as acknowledged in the SLAA <i>'Footways would need to be added to connect to existing pedestrian network.'</i> The Council goes on to further suggest <i>'The footway on Bredlands Lane does not extend to the site however it appears achievable that it could be extended'</i>.</p> <p>We have reviewed the highway in this location and are of the opinion the delivery of the footpath is not achievable within the highway boundary. The highway boundary ownership width in this location reduces to approximately 6.5m and this is insufficient for a single carriageway, verge and footpath), beyond the highway boundary is third party ownership and therefore encounters a ransom position to deliver the required pedestrian footpath connection, on the basis of retaining a single carriageway width. This does raise questions regarding the accessibility and therefore sustainability of the Site and whether it can be delivered.</p>	<p>35</p>

Site	Indicative Yield (dwellings)	HLM Commentary	Revised Yield
		If the Council consider footpaths are deliverable, we recommend that Site could deliver 1ha of developable land, therefore reducing the site yield to 35 dwellings.	

- 3.5 HLM is supportive of a brownfield first approach, however many of the sites referenced above are located in areas that would be detrimental to the amenities of existing residential communities, or consist of residential car parking spaces, public car parking spaces, residential garages, residential amenity space (open space between, around and amongst residential units), protected open spaces (Policy OS9 of the adopted Local Plan 2017), sports pitches and a neighbourhood community centre. The loss of these assets would be a material loss to the existing residents in the areas.
- 3.6 Additionally, as identified above, some of the draft allocations (Policies N29, N30 and N33) have limited facilities within a 15-minute walking distance, and others have not factored site constraints and therefore overestimate the development capacity of the sites (Policy N7, N12, N13, N28, N31, N32 and N33).
- 3.7 Using the few examples above, the Council makes over-optimistic assumptions about site availability, deliverability, viability, and an overestimation of development capacity yield, failing the relevant tests identified in the Framework and consequently is unsound. As a consequence, the Council's will have an under-delivery of housing of at least 700 dwellings (identified from the above Sites) that will need to be re-allocated in alternative locations having regard to genuine deliverability and the potential to viably deliver much needed homes including affordable homes. Land west of Whitstable is demonstrably deliverable and would be a materially more sustainable and viable option than those draft allocations within the Focused Consultation Plan. Suitable wording for a draft allocation policy can be found at Appendix 4.

Trajectory

- 3.8 In addition to the deliverability of the schemes, the Council's trajectory found at Appendix F: Carried forward 2017 Local Plan allocations – Table F.1: Strategic and Housing Allocations, assumes that Site 1 Land at South Canterbury (planning application reference CA//16/00600 approved June 2023) will deliver 50 homes in years 2026/27; 100 homes in years 2027/28; and 200 homes in 2028/29, with all 4,000 homes to be delivered by 2042, i.e. within the emerging Plan period. However, this is not realistic because whilst the approved development is hybrid and includes full consent for 140 dwellings, no conditions or reserved matters applications have been submitted since the site secured outline planning permission, and there is no evidence to demonstrate works will commence imminently. On this basis, the homes will not be fully delivered in Plan period and it is expected first homes will not take place until 2030, therefore pushing back delivery and reducing the overall quantum of homes to be constructed by circa 300 homes.
- 3.9 Having regard to the above, noting the reduction in the number of suitable sites and consequently the quantum of homes to be delivered through the Plan, HLM consider that new sites, such as land west of Whitstable Road (SLAA176), which is a sustainably located site, can accommodate circa 100 dwellings and can be delivered earlier in the plan period as a standalone development, should be allocated. HLM provide the Council with appropriate allocation wording for the Site at Appendix 4.

4. Policy DS19 – Habitats, Landscapes and Sites of Local Importance

- 4.1 Although the Policy is not subject to the Focused Consultation Plan, we provide an updated position on the emerging Policy DS19.
- 4.2 As raised in our previous representations, HLM considers that emerging Policy DS19 is overly restrictive in terms of what can be developed in the Green Gap – only proposals for sports and recreation will be permitted subject to the following criteria:
- Development is kept to the minimum necessary to support the use; and
 - Development does not significantly affect the open character of the Green Gap, or affect the separating function leading to coalescence between existing settlements; and
 - Development is sensitively designed; and
 - Development is sensitively located and does not result in isolated and obtrusive development.
- 4.3 By restricting development in the Green Gap to only sports and recreation, emerging Policy DS19 is significantly more constrained than the adopted policy (OS6 – Green Gaps), which does allow for any form of development within Green Gaps providing it does not significantly affect its open character or lead to coalescence, or result in new isolated and obtrusive development within the Green Gap. There is no change in national policy to justify this more stringent approach.
- 4.4 In addition, the Green Gap is only a local designation, yet the policy is more restrictive than other spatial designations that are in national terms held in the highest regard, specifically the Green Belt and National Landscapes. Even in such areas, the Framework does allow for different forms of developments in the Green Belt and National Landscapes to a greater extent than what the Council is allowing in this local designation. Paragraph 36 of the Framework requires plans to be justified and consistent with national policy in order to be found ‘sound’.
- 4.5 It is evident that the Council is willing to amend the Green Gaps, as confirmed in the Natural Environment and Open Space Topic Paper (2024), as well as introduce development within Green Gaps through the allocation of Bodkin Farm (Policy W6) and Land West of Thornden Wood Road (Policy HB4) sites within the urban areas of Herne Bay and Whitstable Green Gap and Land north of Popes Lane (Policy R9) within the Sturry and Broad Oak Green Gap. These allocations include housing delivery of varying scales within the Green Gap (i.e. similar development to that proposed in the Green Gap at the Land west of Whitstable Road) which fundamentally undermines the draft Policy. We agree infrastructure is capable of being accommodated within Green Gaps without undermining its purpose, but this approach is inconsistent with the Council’s assessment for Land west of Whitstable Road, which has been discounted due to the perceived negative landscape impact on the Green Gap (albeit it is heavily influenced by the existing settlement). In the case of this Site, the impact on the Green Gap would only amount to a very short section of road of approximately 60m and the new School parking area, crossing the Green Gap and providing the access into the Site.
- 4.6 HLM is therefore concerned that an inconsistent approach has been taken, and insufficient work and evidence has been provided to justify how access will be provided to this small to medium site without harming this Green Gap.
- 4.7 To overcome these concerns, it is recommended that Policy DS19 is amended to include other appropriate land uses such as road infrastructure, as well as public open space and recreational areas.

5. Development on Land West of Whitstable Road (SLAA 176)

- 5.1 As referenced above, HLM are promoting the Land at Whitstable Road, Canterbury, to the southern end of Blean and located adjacent to the Rough Common settlement, near Canterbury. In summary, the Site is suitable, available and achievable as follows:
- **Suitable** – the Site represents a wholly suitable location for development in a highly sustainable location, which can be sensitively designed to respond to the landscape.
 - **Available** – the Site is under the promotion of HLM, and it is available for development in the short term.
 - **Achievable** – the Site is medium in size, viable and can accommodate approximately 100 dwellings. These could be delivered, in full, within the first five years of the Plan period.
- 5.2 The Concept Masterplan (Appendix 1) shows a scheme for approximately 100 dwellings, comprising 30 x affordable dwellings (30%) and 70 x market houses, with a mix of one, two, three and four bed flats / houses. The development would be accessed from Whitstable Road; enhanced open space and new recreational routes and planting; new School parking area; new children’s’ play area; sustainable drainage basin; swales; spine streets; retention and enhancement of trees; and pedestrian access. Alongside the preparation of a concept masterplan (see Appendix 1), HLM has commissioned other technical survey works, demonstrating HLM’s intention to progress the Site at the earliest opportunity.
- 5.3 The Framework promotes the use of small and medium sized sites making an important contribution to meeting housing requirements in an area due to the quick build out rate (paragraph 70) and the low-risk nature in respect of infrastructure and land ownership – factors which wholly apply to this Site.
- 5.4 Representations have been made previously by HLM regarding the settlement hierarchy and accessibility of the Site to Rough Common and Blean and the connections to Canterbury, and the corresponding good access to key and strategic community facilities and services, making it a sustainable location for development. We do not intend to same in these representations, but instead respond to the updated Strategic Land Availability Assessment (“SLAA”) and the Sustainability Appraisal (“SA”).

Strategic Land Availability Assessment (“SLAA”)

- 5.5 The Site was assessed through the Council’s SLAA (July 2022) following the Call for Sites submission. The Site’s SLAA reference is SLAA 176.
- 5.6 HLM’s previous representations raised matters regarding the provision of market, affordable and older person housing, community facilities and substantial open space, which will deliver significant public benefits. The previous representations also considered the part of the Site covered by land within a Natural England Priority Habitat Inventory and that a buffer will be provided to Blean Woods National Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, and Ancient Woodland which is outside of the Site, and therefore why these designations should not be constraints to the development of the Site. Further discussion is presented regarding the Agricultural Land Classification; the Mineral Safeguarding Area; access and off-site transport mitigation; the adjacent Public Right of Way; and heritage. None of these matters are insurmountable and the proposed development can be sympathetically designed to address any impacts. Please see these representations for further information.

5.7 HLM has reviewed the updated SLAA Appendix B (August 2025) and makes the following observations.

- The Site is capable of accommodating approximately 100 dwellings at 35dph with car parking provision for 15 spaces and a drop off zone for Blean Primary School, as shown in the concept masterplan (Appendix 1), which is recognised by the Council as a significant positive within the Sustainability Appraisal site scoring matrix.
- The Site is greenfield / agricultural land that has been used historically for grazing, but is deemed to be redundant by the Owner.
- The SLAA identifies that there are seven facilities within a 15-minute walking time from the Site (community hall, primary school, bus stop, place of worship, post office, pub and recreation ground), however HLM would highlight that there are three other facilities that are also within a 15-minute walk time, namely a nursery (The Oaks Nursery), Convenience Store (Premier Rough Common Store), and a Secondary School (Kent College). The Site is also within walking distance to the University of Kent, which should be recognised as an alternative education and employment area the Site has access to. On this basis, the Site is one of the most sustainable greenfield sites within the Council's SLAA and would score better than many other draft allocation sites in the emerging Plan.
- The Site is located within a 5-minute drive to 18 facilities, however, the Council should place no weight on this given 17 of these are also within a 15-minute cycle time, and the Council's spatial strategy aims to significantly change the modal shift to encourage people to walk, cycle or use public transport to visit facilities and services.
- The Council's Townscape / Landscape assessment has not changed since the 2022 SLAA and the December 2023 SLAA Addendum, with concerns raised that development on the Site would contribute to the coalescence of Blean and Rough Common and protrude into the countryside to the west, negatively impacting the landscape.
- HLM has demonstrated that the existing Green Gap on the eastern side of the Site will have limited amendments, with just the northern part of the Site being required to deliver the Site access and car parking area for Blean Primary School (itself a positive highways benefit). An amendment could be provided and the Green Gap, does not, therefore reduce in extent below the minimum distance that exists today between the Rough Common and Blean settlements.

5.8 The Council upholds its position insofar that the Site remains unsuitable due to landscape concerns and that the significant and minor negative impacts cannot be suitably addressed.

Landscape Response

- 5.9 HLM consider that, as demonstrated in previous representations, the Site has a lesser value than the Landscape Character Appraisal concludes due to separation from the main body of the Character Area and the heavy urban influences surrounding the Site.
- 5.10 One of the key concerns identified by the Council within the SLAA is related to the potential negative impact on the landscape and specifically to the reduction of the Green Gap between Blean and Canterbury, and the purported coalescence of Blean and Rough Common, by reason of development protruding into the countryside to the west.
- 5.11 The proposed Green Gap is shown within the proposals map for Blean and at its minimum is 30m in width and alternatively a 60m distance from the nearest residential dwelling at Rough Common and Blean. The revised

concept masterplan (Appendix 1) prepared by HLM shows that only the access road and school parking area in the northern part of the Site, is the only built form within the area covered by the Green Gap (some 0.11ha of the 7.28ha Green Gap, equating to just 1.5% of the total). The remainder of the Site within the Gap is proposed for habitat enhancement, open spacing and additional screening to the Site frontage on Whitstable Road and also between the proposed development boundary and Moat Lane to the south. This screening enhance the perception of separation between the two existing settlements, strengthening and preserving the gap and avoiding coalescence. The housing itself would be outside the Green Gap.

- 5.12 HLM therefore consider the Council's concerns have been overcome through the masterplan, which reemphasises the suitability of the Site from a landscape and visual perspective.
- 5.13 Furthermore, HLM have commissioned a Landscape and Visual Appraisal (Appendix 3) for the Site which is also supported by landscape specific representations (Appendix 2) by HDA. This concludes at 9.1 of the report that the design and layout has been derived from the assessment of local landscape character, settlement pattern and setting of the Conservation Area. The Landscape Appraisal confirms the existing landscape features would be retained and protected during the course of development, with informal open space, tree planting, hedgerows and scrub and wetland habitat creation, which would provide a soft landscape setting to the development. Consequently, the proposal is not considered to have significant adverse effects on the landscape character of the local landscape and the separation between Blean and Rough Common would be maintained, as would the landscape setting to the conservation area.
- 5.14 The Landscape and Visual Appraisal confirms, that on the eastern side of the development, dense and regularly maintained hedgerows are a feature and if continued to mature to 4-5m would provide significant and effective screening to the new development. Further planting would supplement and enhance all existing trees and hedgerows, thus softening the southern edges of Blean village and reinforce habitat connections to the Blean Woods and buffer the pastoral setting of Church Wood.
- 5.15 The Landscape Appraisal recognises the change of the Site from a field in pasture and paddocks to residential and therefore having an initial adverse effect on the character of the Site (noting the Council accept greenfield sites are required to meet development needs), but these would not have a significant effect on wider landscape character areas, and the adverse effect reducing as the proposed landscaping establishes to temporarily moderately adverse, then to minor adverse after 15 years. The layout ensures suitable buffers between the new development, the conservation area and allows for a sense of separation to Blean and Rough Common.
- 5.16 The HDA Representations (Appendix 2) confirm that the Site would enhance the character and appearance of the Gap through new semi-natural tree and woodland planting along with enhancing habitat creativity along with enhance perceived separation by reducing the intervisibility between the two settlements.
- 5.17 Given the above, HLM does not consider that the allocation of the Site would diminish the effectiveness of the Green Gap, nor would there be a long-lasting adverse impact. Indeed, the proposal would in fact enhance the function of the Green Gap, visually, ecologically and arboriculturally. The proposals would seek to enhance the benefit of this Green Gap for the community by making it useable public open space.
- 5.18 The most up to date layout plan confirms development would not have an adverse effect on townscape character, would maintain separation between settlements and would avoid the sense of coalescence between Blean and Rough Common.

- 5.19 Furthermore, any impacts upon the landscape and Green Gap do of course in any event need to be considered in the context of the Council's acceptance that development in the countryside will be necessary to accommodate the requirements of the emerging Local Plan and that in relation to other allocations referenced in these representations, using land within the Green Gap is also necessary. Furthermore, the District contains a range of environmental constraints including some 27% designated at the Kent Downs National Landscape. Paragraph 189 of the Framework is clear that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes, which have the highest status of protection in relation to these issues" (emphasis added).
- 5.20 There are more local designations including Green Gaps and Areas of High Landscape Value. However, paragraph 188 of the Framework is clear that "Plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework". In this context, local landscape designations would fall into a category of lower environmental or amenity value and must be balanced against other objectives of the Framework, for example "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs" (paragraph 36a) and supporting the Government's objectives of "significantly boosting the supply of homes" (paragraph 61). Accordingly, local landscape designations should not in principle be seen as a reason to prevent otherwise sustainable development.
- 5.21 Notwithstanding the above, HLM has also identified an inconsistency in the approach between the SLAA and draft Policy DS19. The draft Policy at (3) stipulates that within the local landscape designation areas (including Blean Woods), proposals for development will only be permitted where they conserve and where appropriate enhance the special qualities of the landscape. This does not prohibit development, providing it meets the tests of the policy. Whereas, the SLAA has directly rejected the Site due to its location within the local landscape designation. HLM support the wording of Policy DS19(3) in this respect, but recommend the Council revisit the SLAA assessment and consideration of the Site in this regard to ensure it is consistent.
- 5.22 As shown within these representations it is evident that the Land west of Whitstable Road is capable of complying with Policy DS19(3) insofar that it can be designed to ensure its scale, design and material would not impact on the local landscape character and its special qualities, and (a); it provides comprehensive landscaping to enhance the appearance of the designated landscape (b); and there would be no significant impacts on conservation interests.
- 5.23 Whilst the Site is in close proximity to Blean Pastures Wildlife Site and being within an orange area for Great Crested Newts, matters regarding protected species could be mitigated during the course of the planning process and are not therefore seen as 'showstoppers'.
- 5.24 HLM agree with the SLAA that the design of the scheme could address residential amenities of neighbouring occupiers.
- 5.25 Based on the above, HLM consider the Site is technically suitable for development and landscape matters have been addressed through the revised landscape masterplan.
- 5.26 In light of the Council's concerns regarding the impact on the landscape, the SLAA fails to take the Site beyond Stage 2 and therefore does not respond to other matters regarding suitability, availability, viability and achievable.
- 5.27 As outlined earlier, the Site is considered to be suitable in location for development having regard to relevant policy considerations: HLM are promoting the Site and it is therefore available with a realistic prospect that housing will

be delivered on the Site within five years; and there are no known constraints or issues that would affect the viability and achievability of the scheme.

5.28 HLM consider that the scheme is acceptable in all these respects and would request that the Site is re-appraised in light of the additional evidence supplied and shortfall in allocations.

6. Sustainability Appraisal

- 6.1 Appendix G Site Assessment Appendix C Site scoring matrix (August 2025) sets out the Council's latest assessment. The Sustainability Appraisal has not changed the scoring for Land west of Whitstable Road from the 2024 version (Appendix C of the Development Topic Paper (2024) – Summary of SLAA and SA Outcomes), other than increasing the impact on SAO 7: Flood Zone from significant positive effect to significant negative, which is discussed below.
- 6.2 The SA identifies significant positive effects of the Site development on housing, employment and sustainable communities. HLM concur with these findings.
- 6.3 HLM has considered the overall scoring for the Site and whilst full regard is had to Appendix K – Definitions of Significance, it is considered that it should be scored more favourably. HLM agree with the scores for SAO 1 (Air Quality), SAO 6 (Water), SAO 9 (Heritage), SAO10 (Dwellings), SAO 12 (Employment) and SAO14 (Sustainable Communities) based on the factual position of the SA Matrix found at Table 3.3 of the SA of SLAA Sites (August 2025).
- 6.4 Appendix B of the SA Report for the Focused Consultation (August 2025) sets out the consultation response summary, including responses from the Council on HLM's revised scoring set out in the previous Regulation 18 Consultation representations. Our response to the SA's conclusions and the Council's responses is discussed in more detail below.

SAO 3: Biodiversity

- 6.5 We note the SA Matrix at Table 3.3 of the SA of SLAA Sites (August 2025) outlines the call for sites appraisal matrix and how SA objective will be scored against the criteria, and states that significant negative effects will occur if the Site is, inter alia, within 400m of an internationally/nationally designated site, the site contains protected species or is within or intersects with a priority habitat site. The Site does possess these features and it is factual therefore that the Site scores a significant negative in this regard. However, the methodology does not account for mitigation or policy requirements and is purely a factual matter, and any development proposal will only be acceptable in practice if they are found to be compliant with the policies within the Framework and the development plan, and statutory protections afforded by separate legislation.
- 6.6 We maintain our position from the previous representations and do not believe that the Site should be considered as having significant negative effects in regard to biodiversity.

SAO 4: Geology

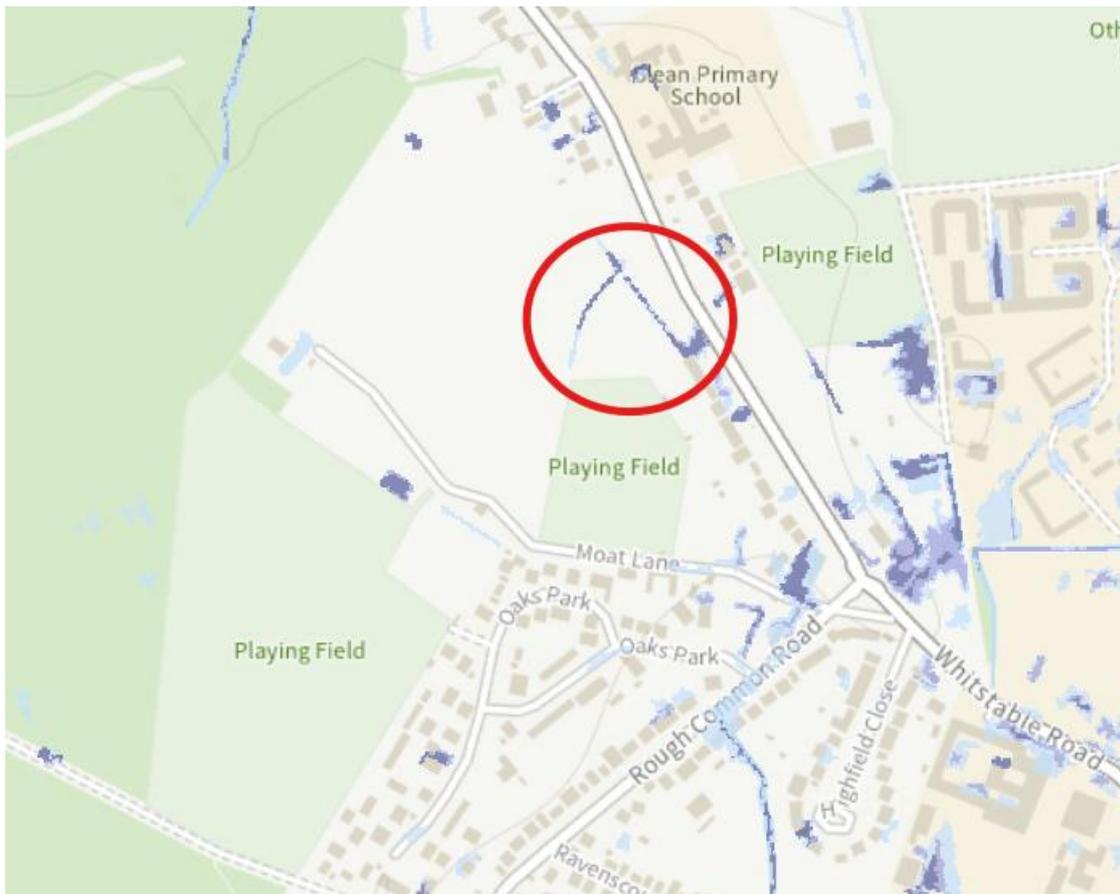
- 6.7 Part of the Site is within a Mineral Safeguarding Area for river terrace deposits, but does not include a geologically important site such as a RIG. Our previous representations noted that the Site lies on the western edge of the KCC Minerals Safeguarding area, for river terrace deposits, the main safeguarded area lies to the east of the Whitstable Road. In accordance with the SA methodology, the Site would result in significant effects.
- 6.8 However, the Site is small in extent, in close proximity to existing residential areas and it would be unviable to extract any minerals. HLM is aware other sites have comparable geology and the Council has downgraded the geology score to neutral as it has been found to be unviable to extract the material on this site.
- 6.9 Accordingly, the Council should take a consistent approach and reduce the score of the Site to neutral in regard to the SAO 4.

SAO 5: Landscape

- 6.10 The SLAA sets out that *“the Site is within the Green Gap and could lead to settlement coalescence and due to the Site projecting into existing views, development could have a significant adverse impact on the surrounding open countryside although there is some screening and it is viewed within the context of sports fields”*. (underlining for our emphasis)
- 6.11 We note the SA Matrix at Table 3.3 of the SA of SLAA Sites (August 2025) outlines the call for sites appraisal matrix and how SA objective will be scored against the criteria, and for SAO 5, the test is whether development may have a significant adverse effect on landscape/townscape/seascape character and/or the site is within the Kent Downs National Landscape.
- 6.12 The Council’s Appendix G Site Assessment document sets out that *“Comments noted. The SA of SLAA does not take into account mitigation or site design / layout. It is considered that anything outside of the settlement boundaries / built confines of settlements is within the ‘open’ countryside. The site is within a green gap. Therefore, it is considered the score of significant negative effects is still appropriate.”*
- 6.13 We set out elsewhere in these and previous representations as to why the development of the Site would be acceptable in the Green Gap and would not result in coalescence or harm to the open countryside. It is considered that the proposed development of the Site would not result in any greater harm to the countryside when compared to other greenfield development proposals.
- 6.14 We maintain our position from the previous representations that the effects on land / townscape as set out in the SA would therefore be neutral in line with the SA methodology.

SAO 7: Flood Zones

- 6.15 In regard to Flood Zones, the Site’s score has worsened from significant positive to significant negative.
- 6.16 The Site is not within Flood Zones 2, 3a or 3b and therefore does not contain any fluvial flood risks. The change been made due to the Site containing a small area at high risk of surface water flooding (see image below with area circled red) insofar the Site intersects with a 1 in 100 or 1 in 1000 Risk of Flooding from Surface Water Hazard area. The area is limited, following the line of an existing ditch, and as shown in the concept masterplan, (Appendix 1) would contain pathways, green infrastructure and sustainable urban drainage basins only, therefore, not impacting key routes or vulnerable spaces within the Site.



- 6.17 The Planning Practice Guidance was updated in September 2025, and in applying paragraph 175 of the Framework, a proportionate approach should be taken to the Flood Risk Sequential Test and it is no longer required if a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere (Reference ID: 7-027-20220825). This is expected to be the case here.
- 6.18 Therefore, significant negative effects arising from the risk of surface water flooding would not occur. As a result, HLM consider the Site should be considered as having significant positive effects in regard to Flood Zones.

Summary

- 6.19 In light of this revised scoring, particularly in regard to landscaping and flood zones, HLM request the Council review the scoring and reconsider land west of Whitstable Road as a draft allocation given it was discounted solely on landscaping and coalescence grounds, and the highlighted shortcomings of the proposed housing provision and issues with the new draft allocations.

7. Conclusion

- 7.1 These representations respond to the Focused Consultation Plan specifically in regard to the provision of housing and general spatial strategy contained within the Plan. In this regard it is considered that:
- Insufficient housing sites have been allocated within the Focused Consultation Plan to address the worsening affordability of the District and to provide a sufficient buffer and to ensure robustness to non-implementation of sites or slower delivery on large strategic sites that the Plan relies on, and the new draft allocations are not deliverable in accordance with the Framework.
 - Additional appropriate land uses need to be incorporated into draft Policy DS19 in relation to Green Gaps to ensure that the Policy is sound.
 - Land West of Whitstable Road is a sustainable site located within a sustainable location and settlement, we would recommend that this Site should become a draft allocation in the emerging Local Plan.
- 7.2 Land at Whitstable Road, Canterbury (SLAA ref: SLAA 176), which is being promoted by HLM, is suitable, available and achievable for approximately 100 dwellings and a school parking area, which is recognised by the Council as a significant positive within the SA site scoring matrix. The Site would be a medium sized development, within a highly sustainable location, on the wider the edge of Canterbury and close to facilities and services. This is a general location the Council is seeking to focus growth in the District, as confirmed by the draft Plan, Sustainability Appraisal and other evidence based documents.
- 7.3 The Site received a relatively positive assessment within the SLAA, and further work has been undertaken by HLM to ensure the perceived landscape concerns can be overcome, through changes to the concept masterplan, such as reduced net developable area and retention and strengthening of Site screening to preserve and enhance the Green Gap. To this end, HLM do not consider the development of the Site would result in unacceptable landscape issues, nor a diminishing of the Green Gap, resulting in a neutral landscape impact overall. In fact, HLM consider that through the application of the SA process, the Site scores better than existing allocations, notwithstanding the need for additional allocations.
- 7.4 Hallam Land Management is supportive of collaboratively working with Council in helping to meet its housing requirements for the plan period and would welcome the opportunity to discuss the Land West of Whitstable Road with the Council, which should be allocated for housing within the Regulation 19 Consultation Plan, with appropriate allocation wording for the Site found at Appendix 4.

Appendix 4 – Policy N34 – Land West of Whitstable Road, Canterbury - Draft Allocation Policy Wording

Policy N34 – Land West of Whitstable Road, Canterbury



Key

- | | |
|--|--|
|  <u>Site Boundary</u> |  <u>Improved pedestrian and cycle access</u> |
|  <u>Open space/biodiversity opportunities /retention of Green Gap</u> |  <u>Vehicle access</u> |
|  <u>Pedestrian/cycle link</u> |  <u>Blean Primary School Drop-off Parking - Indicative location</u> |

LAND WEST OF WHITSTABLE ROAD – CONCEPT MASTERPLAN

Site Policy N34 (West of Whitstable Road, Canterbury) is allocated for a residential development. Planning permission will be granted for development which meets the following criteria:

1) Development mix

Across the site, the development mix will include:

- a) Approximately 100 new dwellings including affordable housing, accessible housing and an appropriate housing mix in line with Policies DS1 and DS2.
- b) Approximately 15 new car parking spaces for the drop-off and collection of Primary School pupils associated with Blean Primary School.
- c) Proportionate contributions to community infrastructure in line with Policy DS7.
- d) Open space provided in line with Policy DS24.

2) Design and layout

The design and layout should:

- a) Provide a high quality built environment, in line with Policy DS6, with an average net density of approximately 35 dph;
- b) Mitigate and/or minimise the impact of the Green Gap between Blean and Rough Common; and
- c) Assess Areas of Archaeological Potential and protect and enhance nearby heritage assets, including Hothe Court Conservation Area, in line with Policy DS26.

3) Landscape and green infrastructure

The green and blue infrastructure strategy for the site should:

- a) Incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area F2: Stour Valley Slopes set out in Canterbury Landscape Character and Biodiversity Appraisal;

- b) Provide a landscape buffer on the southern edge of the site to increase the associated Green Gap provision between Blean and Rough Common.

- c) Provide an area of open space within the Site that retains the majority of the Green Gap to the West of Whitstable Road; and

- d) Retain all ancient woodland and ancient or veteran trees, ensuring they are not damaged nor is their future retention threatened, in line with Policy DS18.

4) Access and transportation

The access and transport strategy for the site should:

- a) Provide safe and convenient pedestrian and cycle connectivity through the creation of new and improved routes including:
 - i) Connections to Whitstable Road.
 - ii) Connections to Rough Common to Blean Primary School via PRoW CB30.
 - iii) Improvements to pedestrian crossing on Whitstable Road, providing a safer connection associated with Blean primary school; and
 - iv) Relocation of the Bus Stop on Whitstable Road, to improve safety.
- b) Provide primary vehicular access in the northern edge of the site on Whitstable Road; and
- c) Provide approximately 15 car parking spaces for Blean Primary School.

Appendix 1 – Concept Masterplan

Extent of site



1. New vehicular access off Whitstable Road
2. New safe crossing point connecting public rights of way across Whitstable Road
3. Existing open space enhanced with new recreational routes and planting
4. New childrens' play area
5. Sustainable drainage basins
6. Swale providing conveyance to basin
7. Spine street through central residential layout
8. New homes face outward to site boundaries
9. Existing boundary trees retained and enhanced with new shrub planting where appropriate
10. Pedestrian access point to residential layout



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Revision	Date	Description
1	17/04/20	Initial
2	17/04/20	Final

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Client
Hallam Land
Project
**Land west of Whitstable Road
Canterbury**
Description
**Proposed
Concept Layout**

Status
Preliminary
Scale
1:1250@A1 VG
Job Number
35740
Drawing Number
301



Appendix 2 – Landscape Representations



**WHITSTABLE ROAD
CANTERBURY
KENT**

Landscape representations for regulation 18 consultation.

by

Hankinson Duckett Associates

for

Hallam Land Management Ltd

HDA ref: 2079.40/03

Issue: 04

Date: October 2025

hankinson duckett associates

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4 The Landscape sensitivity of the HLM site	3
5 Predicted Landscape Effects	6
6 Conclusions	6

1. Introduction

1.1 Hankinson Duckett Associates (HDA) was appointed in October 2025 by Hallam Land Management Ltd (HLM) to provide landscape representations for the regulation 18 consultation, for the emerging Local Plan. This is in the context of promoting circa 12.1 acres of land west of Whitstable Road, Canterbury (ref: SLAA 00176 – Whitstable Road) hereafter referred to as the site. These representations are intended to be read in conjunction with the initial Landscape and Visual Appraisal (ref 2079.40, revision 03), also produced by HDA in May 2024.

1.2 The site was not considered suitable for allocation within the regulation 18 Local Plan, with the primary reason for exclusion relating to the perceived landscape harm associated with the development of the site. This report seeks to consider this reason for exclusion.

2. Council response to site promotion

2.1 The site was reconsidered within the SLAA (August 2025) at Appendix B of the report, following representations by HLM.

2.2 Landscape commentary included the following analysis:

'Townscape: The site is situated adjacent to the settlement of Rough Common. The north eastern part of the site, fronting Whitstable Road, forms part of the Green Gap between Blean and Canterbury.'

'Landscape: The western part of the site is surrounded by open countryside and the eastern part of the site is within the Green Gap. The submitted Landscape Assessment states that any landscape impacts would reduce as proposed landscape planting becomes established and that open space could be provided to the north of the development to maintain separation to Blean. However there are still concerns that development on the site would contribute to the coalescence of Blean and Rough Common and protrude into the countryside to the west, negatively impacting the landscape.'

2.3 The overall conclusions of the SLAA analysis in terms of whether the site was considered suitable for development was '*No - there are concerns regarding landscape impact*'.

2.4 It is noted that only the access road and school car parking area is proposed within the area covered within that Green Gap (some 0.11ha of the 7.28ha Green Gap, equating to just 1.5% of the total Green Gap) and that the remainder of the gap located within the site boundary is proposed for habitat enhancements and additional screening that would enhance the perception of separation between the two existing settlements. The proposed housing development sits outside the Green Gap.

- 2.5 There remains a lack of evidence / rationale for this decision making, which is disappointing, given the evidence provided to the council with which to reassess the site. It is unclear who has carried out the landscape elements of the SLAA assessment on behalf of the council and whether they are a qualified landscape professional.
- 2.6 The latest Concept Layout (Ref: 301_P7) have been provided with this submission in order to try to respond to comments and re-emphasise the suitability of the site from a landscape and visual perspective.

3. Potential effects on the Green Gap

- 3.1 The site includes part of the Green Gap between Blean and Rough Common, designated within the adopted Local Plan and proposed for retention within the emerging Local Plan. The gap is not easily seen from the road (as confirmed by the 2015 Local Plan Inspector), however no housing development is proposed on the Whitstable Road frontage, or within the wider green gap policy area to the south-east.
- 3.2 The current extent of the Green Gap between Blean and Rough Common, and its relationship with the HLM proposals, is identified on the submitted plan: 'Existing Green Gap with Proposed Concept Masterplan' (Ref: 104_01). The gap is 7.28ha in total, with approximately 1.29ha (roughly 1/5) that overlaps with the site boundary. With the exception of the proposed access road 0.06ha in area and school car parking area 0.05 in area (total 0.11 in area)), the remainder of the Green Gap within the HLM site is proposed as open space land uses. This is demonstrated on the submitted plan: 'Extent of Site showing Green Gap Land Areas (Ref: 103_01). The latest Concept Layout (Ref: 301_P7) would not have an adverse effect on townscape character, would maintain separation between settlements and would avoid the sense of coalescence between Blean and Rough Common.
- 3.3 In recognition of the council's desire to maintain settlement separation and to maintain the undeveloped character of the 'green gap' and avoid the sense of coalescence, the HLM proposals have demonstrated the inclusion of an appreciable gap, outside of the green gap policy area of more than 100m between the development proposals and the nearest edge of Rough Common. By way of comparison the existing gap between settlement boundaries as defined in the Local Plan is approximately 30m and between built development, on the edge of the settlements on the Whitstable Road, is circa 60m. Furthermore, The HLM site provides additional land (approximately 0.54ha in area) to be included within the Green Gap in the future, increasing the overall area of the Green Gap to 7.79ha, as shown on plan: 'Proposed Gap with Proposed Concept Masterplan (Ref: 105_01).

- 3.4 Section 5 of Draft policy DS19 relates to Green Gaps and states that:
'5. Within the designated Green Gaps, as defined on the policies map, only proposals for sports and recreation uses will be permitted, and only where the development:
(a) Is kept to the minimum necessary to support the proposed use; and
(b) Does not significantly affect the open character of the Green Gap, or affect the separating function leading to coalescence between existing settlements; and
(c) Is sensitively designed, including in terms of form and lighting; and
(d) Is sensitively located and does not result in isolated and obtrusive development.
Proposals for development within the Herne Bay and Whitstable Green Gap will be subject to the criteria above, however education, outdoor leisure or allotments may also be considered as suitable uses. Any proposal must not result in a material expansion of the built confines of the urban areas of Herne Bay or Whitstable.'
- 3.5 This seems overly prescriptive and would not allow for beneficial land uses associated with habitat creation or other land uses that would not necessarily affect the openness of the gap and may benefit the visual separation of settlement. For example, national policy relating to Green Belt, allows certain other forms of development *'provided they preserve its openness and do not conflict with the purposes of including land within it...'* (paragraph 154 h) of the December 2024 NPPF). These other forms of development include local transport infrastructure and changes in land use, with examples given of outdoor sport, recreation, cemeteries and burial grounds.
- 3.6 The proposals would seek to introduce new recreational provision within the gap, in accordance with the emerging policy, but would also look to enhance the character and appearance of the gap through new semi-natural tree and woodland planting. This would enhance habitat connectivity and would enhance perceived separation by reducing the intervisibility between the two settlements. The proposed site access would pass through the gap; however, this is located within an area of the gap that is already compromised by settlement to the east and would have a limited effect on the openness of the gap.

4 The landscape sensitivity of the HLM site

- 4.1. The Canterbury Landscape Character Assessment and Biodiversity Appraisal (2021) categorises the District into broad landscape types which are sub-divided into local Landscape Character Areas. The site lies within the Stour Valley Slopes: F2
- 4.2 The site land uses comprise horse paddocks and small-scale pasture. The site has little internal landscape structure or landscape features of merit. With the exception of a short section of tarmacked footpath, CB30, footpaths do not cross the site but do lie adjacent to the southern and parts of the eastern and western site boundaries. The land uses are commonplace in the local area, and are urban edge in character. The site is enclosed and relatively quiet but not

tranquil as it lies adjacent to the urban edge and Whitstable Road, a busy route into Canterbury. The site has been assessed as being of moderate landscape quality.

- 4.3 The boundary features, the western tree belt, northern and eastern hedgerows and small trees groups along the southern edge of the site are more significant and long-standing landscape features and add to the wider landscape infrastructure. They are of moderate- high landscape quality.
- 4.4 Visually, the site is generally contained and inward looking. There are some views of the northern and eastern parcels of the site from the adjacent housing which lies within the Hothe Court conservation area, however the majority of the site does not form part of the immediate landscape setting. The wooded context and flat topography of the landscape to the west and south of the site precludes views of the site from the wider area. The visual envelope of the site is very limited, and includes views from Whitstable Road, Moat Lane, footpaths CB9, 10 and 30, which have partial or open views into parts of the site. The site as a whole is not visible from one public vantage point.
- 4.5 There are no national landscape designations that cover the site or its immediate environs. The Kent Downs National Landscape (formally referred to as AONB) lies to the south, beyond Canterbury and well outside the context of the site. The site does lie within the Blean Area of High Landscape Value (AHLV), although the site as a whole, is not reflective of the valued landscape associated with Blean Wood AHLV. Within the emerging local plan, the AHLV is being taken forward, but re-named as a Local Landscape Designation.
- 4.6 'Canterbury District Local Landscape Designations Review and Recommendations' carried out in January 2021 by LUC, looks at the designation in detail. The site lies within 'The Blean woods' candidate Local Landscape Designation.
- 4.7 The site lies in Landscape Character Area F2, the Stour Valley Slopes, which represents a very small part of the designation. The Kent College land, including the site, paddock to the north and playing fields to the south-west, are the only elements of this character area that are included within the draft Local Landscape Designation. Other Landscape Character Areas fall entirely within the locally designated landscape.
- 4.8 The special qualities of the Blean Woods are set out in table format at pages 32 and 33 of the report and are represented below along with a commentary on the contribution of the site to these special qualities. The site displays few – if any – of the special qualities outlined within the Canterbury District Local Landscape Designations Review and Recommendations for the Blean woods candidate Local Landscape Designation.

4.9 The sensitivity of the site to residential development is determined by a combination of landscape value and the susceptibility to development. The site is a greenfield site, but it contributes little to the character and appearance of the wider landscape. It has a small visual envelope and has some urban edge influence from the adjacent residential and educational land uses. The communications tower to the south-west of the site is also a detracting factor. The overall sensitivity of the site is judged to be Medium.

4.10 Draft policy DS19 (Habitats, landscapes and sites of local importance) is of particular relevance to the site. Guidance within the policy is split into six sections, with each section relating to a type of local designation. Section 3 (regarding Local Landscape Designations) permits development subject to a range of criteria. The wording of this section is considered to be positive and is set out as follows:

'3. Within the Local Landscape Designation areas at Seasalter Marshes, North Downs, Blean Woods, Wantsum Channel and Stour Valley, as defined on the policies map, proposals for development will only be permitted where they conserve and, where appropriate, enhance the special qualities of the landscape. Consideration will be given to

- (a) the extent to which the developments location, scale, design and materials would impact on, or protect, the local landscape character and its special qualities;*
- (b) whether the proposal would enhance the future appearance of the designated landscape; and*
- (c) whether there are significant impacts on the historic setting, archaeological or nature conservation interests.*

4.11 The proposals respond to criteria a-c of point 3 in the following ways:

- a) The development would be appropriate for the area and would respond positively to the guidelines set out within the Canterbury Landscape Character Assessment and Biodiversity Appraisal (2021);
- b) The proposals include woodland and tree planting, which are a key component of local landscape character and would reduce the urban influence of adjacent settlement. There is the potential for the proposals to enhance the future appearance of the Blean Woodland.
- c) Further specialist work would be required; however, it is considered possible for the proposals to come forward without significant impacts on the historic setting, archaeological or nature conservation interests of the site.

4.12 If it is (rightly) possible to address the development of a site through the application of policy, then it is considered that the same designation should not be seen as a complete constraint to the site being allocated.

5. Predicted Landscape Effects

- 5.1 The landscape proposals for the site have been derived from an assessment of local landscape character, settlement pattern and the setting to the Hothe Court conservation area. The proposed development is located outside of the Green Gap but accessed from Whitstable Road. The paddocks fronting the road would be retained as semi-natural open space typified by woodland and tree planting, which would maintain and enhance the separation between settlement. The paddock to the north of the existing pitches (also within the Green Gap) would become an area of open space, with a children's play area and recreational routes, which would complement existing land uses. The southern part of the site (outside the Green Gap) would also be retained as open space, maintaining a 100m landscape buffer to Rough Common.
- 5.2 The proposals would not affect the Blean Woods Complex directly or the Blean Pastures which lie adjacent to Church Wood, which form the immediate setting to the woods. The existing oak and hornbeam tree belt which lies between the site and Blean Pastures would be retained and enhanced, to provide a visual buffer and enhance the habitat connectivity required of the policy. It should also be noted that the site lies within, and is characteristic of, the Landscape Character Area F2 The Stour Valley Slopes, and is not reflective of the more rural landscape characteristics associated with Blean Wood AHLV.
- 5.3 The Initial Landscape and Visual Appraisal (LVA - ref 2079.40, revision 03), submitted for previous representations, identifies how the site could be developed sensitively, whilst complying with adopted and emerging policy. The report concludes that the character of the site would change from a field in pasture and paddocks to residential development. This would have an initial adverse effect on the character of the site, although the changes would not have a significant effect on wider landscape character areas. The adverse effects would reduce as the proposed landscape planting becomes established. Open space to the north of the development would provide a suitable buffer between the new development and the conservation area and maintain the sense of separation between Blean and Rough Common.

6. Conclusions

- 6.1 The conclusions drawn from analysis of the proposals (see previous representations) and the council's evidence to date are that:
- The site has a Medium landscape and visual sensitivity to development.
 - It lies within the draft local landscape designation but contributes little to the special qualities of the designation.
 - Part of the site lies within the Green Gap between Blean and Rough Common, however, with the exception of the proposed vehicular access (0.06ha) and school car parking area (0.05ha), the land within the Green Gap would be retained as open space land uses.

- The proposals could be designed to comply with draft policy DS19 (Habitats, landscapes and sites of local importance), which considers development within local designation.
- The proposals would respond positively to the landscape context of the site and emerging policy.
- The proposals would provide opportunity for enhancements within the Green Gap, which would maintain and enhance the separation between Blean and Rough Common.
- An additional area of open space (0.54ha), could be introduced to the south of the site (increasing the overall Green Gap from 7.28ha to 7.79ha), in order to maintain a minimum 100m gap (larger than the existing gap to the north-east) between the proposed development and Rough Common.
- Landscape should therefore not be considered a valid reason to prevent the site from being allocated.

Appendix 3 – Landscape and Visual Appraisal



**WHITSTABLE ROAD
CANTERBURY
KENT**

Initial Landscape and Visual Appraisal:

by

Hankinson Duckett Associates

for

Hallam Land Management Ltd

HDA ref: 2079.40

Issue: 03

Date: May 2024

hankinson duckett associates

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HDA Document Control and Quality Assurance Record

Plans

HDA 1: Site Location and designations

HDA 2: Site Survey

HDA 3: Photo-location Plan

Supporting photographs

Appendix 1: Extract from the Canterbury Landscape Character Assessment and Biodiversity Appraisal

Appendix 2: Extract from Local Landscape Designations Review and recommendations 2021

1 INTRODUCTION

1.1 Instructions

- 1.1.1 Hankinson Duckett Associates (HDA) was appointed in April 2024 by Hallam Land Management Ltd to undertake an initial Landscape and Visual Baseline Assessment for the development of circa 12.1ha of land west of Whitstable Road, Canterbury. This is in the context of promoting the site (ref: SLAA 00176 – Whitstable Road) as part of the representations for the emerging Local Plan.
- 1.1.2 This report assesses the existing landscape baseline and context for the site; the contribution the site makes to the identity and character of adjacent settlements and provides a high-level assessment of the likely landscape and visual effects of residential development on the character and appearance of the countryside around Rough Common and Blean. The development assessed includes residential housing, access roads, planting, a Sustainable Urban Drainage Scheme (SuDS), and open space. Further to the initial assessment, recommendations are made as to how identified effects may be further mitigated through scheme design and a suitable landscape strategy.
- 1.1.3 The site comprises horse paddocks and a field in pasture, located to the west of Whitstable Road, adjacent to existing housing on the south-side of Blean village and west of the playing fields of the Kent College campus, adjacent to the village of Rough Common. The site is bordered, to the south by Moat Lane which provides access to the playing fields and the telecommunications tower to the west of the site. The Blean Woods lie to the west and north of the Kent College campus.

1.2 Methodology

- 1.2.1 National landscape guidance uses landscape character as a basis for policy. Natural England has established the current methodology for the character-based approach to landscape assessment. This provides a foundation, with adaptation, for use in project-specific landscape assessment. It describes the application of landscape character assessment at different scales: the national/regional scale, local authority scale and local scale. The third edition of the 'Guidelines for Landscape and Visual Impact Assessment' sets out landscape assessment methodology, which provides the basis for use in project-specific landscape assessment.
- 1.2.2 The approach to this Landscape and Visual Assessment is based upon the latest guidance, and upon HDA's extensive practical experience of assessment work. The baseline site survey was undertaken in April 2024 and included assessment of the wider area.

2 LANDSCAPE PLANNING POLICY CONTEXT

2.1 Introduction

2.2.1 The landscape and visual assessment has regard to the requirements of the development planning process. The planning framework assists in the identification of the issues related to landscape, particularly in relation to landscape designation and policy objectives.

2.2 National Planning Policy

The Framework

2.2.1 The National Planning Policy Framework sets out the government's planning policy. Relevant paragraphs from the Framework are identified below:

- Paragraph 11 – Presumption in favour of sustainable development;
- Paragraph 96 – Achieving healthy, inclusive and safe places (Section 8 – Promoting healthy and safe communities);
- Paragraph 135 – Design of developments (Section 12 – Achieving well-designed and beautiful places);
- Paragraph 136 – Trees;
- Paragraph 180 – Valued landscape (Section 15 – Conserving and enhancing the natural environment).

2.3 National Planning Practice Guidance (NPPG)

2.3.1 The NPPG was launched as a web-based resource on 6th March 2014. The guidance supports and informs the framework and sets out further specific guidance in relation to landscape assessment and green infrastructure. NPPG categories relevant to this development include 'Natural Environment' and 'Design: process and tools'.
<https://www.gov.uk/government/collections/planning-practice-guidance>

2.4 Local Policy

2.4.1 The site falls within the administrative area of Canterbury City Council. The Canterbury District Local Plan 2017 covers a period up to 2031.

2.4.2 The Current Local Plan policies that are of relevance to this assessment are:

- Policy LB2 Areas of High Landscape Value;
- Policy LB4 Landscape Character Areas;
- Policy OS6 Green Gaps; and
- Policy HE6 Conservation Areas.

2.4.3 The Regulation 18 Draft Canterbury Local Plan 2040 was published in March 2024. Given that the site is being promoted for inclusion within the emerging Local Plan, the draft policies are considered relevant for the assessment of the site. Relevant draft policies include:

- **DS19** – Habitats, landscapes and sites of local importance;
- **DS21** – Supporting Biodiversity Recovery;

- **DS22** – Landscape Character;
- **DS23** – The Blean Woodland Complex; and
- **DS26** – Historic Environment and Archaeology

2.4.4 It is considered that draft policy DS19 (Habitats, landscapes and sites of local importance) is of particular relevance to the site. Guidance within the policy is split into six sections, with each section relating to a type of local designation. Sections 3 (regarding Local Landscape Designations) and 5 (regarding Green Gaps) are considered most relevant to this report. The wording of these two sections is as follows:

'3. Within the Local Landscape Designation areas at Seasalter Marshes, North Downs, Blean Woods, Wantsum Channel and Stour Valley, as defined on the policies map, proposals for development will only be permitted where they conserve and, where appropriate, enhance the special qualities of the landscape. Consideration will be given to

- (a) the extent to which the developments location, scale, design and materials would impact on, or protect, the local landscape character and its special qualities;*
- (b) whether the proposal would enhance the future appearance of the designated landscape; and*
- (c) whether there are significant impacts on the historic setting, archaeological or nature conservation interests.*

5. Within the designated Green Gaps, as defined on the policies map, only proposals for sports and recreation uses will be permitted, and only where the development:

- (a) Is kept to the minimum necessary to support the proposed use; and*
- (b) Does not significantly affect the open character of the Green Gap, or affect the separating function leading to coalescence between existing settlements; and*
- (c) Is sensitively designed, including in terms of form and lighting; and*
- (d) Is sensitively located and does not result in isolated and obtrusive development.*

Proposals for development within the Herne Bay and Whitstable Green Gap will be subject to the criteria above, however education, outdoor leisure or allotments may also be considered as suitable uses. Any proposal must not result in a material expansion of the built confines of the urban areas of Herne Bay or Whitstable.'

2.4.5 The evidence base for the Local Plan currently includes a Landscape Character and Biodiversity Appraisal 2020 Appendix 1, Local landscape Designation review and Recommendations 2021 Appendix 2, Review of Landscape Character Areas against policy 2021 and a Green Gaps and Local Green Space Review 2021.

3 SITE CONTEXT

3.1 Location and Settlement Pattern (*Plan HDA 1*)

3.1.1 The site lies on the south-western edge of Blean village, adjacent to the Kent College farm and college playing fields. Beyond the college estate lies Church Wood part of the Blean woods complex to the west and the settlement of Rough Common to the south. The centre of Blean village is located to the north of the site, a semi-nucleated settlement straddling the A290. The village extends south along the A290, Whitstable Road, to include Blean Primary School and adjacent houses which lie to the east of the main road and the site.

3.1.2 Blean and Rough Common are separated by the college playing fields, horse paddocks and the sports facilities associated with Kent University. Both settlements extend along Whitstable Road, as linear, ribbon development, with a narrow open gap (less than a small field in width) between residential development on opposing sides of the road. The gap between settlements, as perceived from the road, is strengthened by the open land immediately adjacent to Whitstable Road to the west of the road, north of Rough Common and to the east of the road, south of Blean village. The full extent of the gap between settlements, as perceived from Whitstable Road, is screened from view by roadside hedgerows and mature field boundary hedgerows.

3.2 Geology and Soils

3.2.1 The soils form a complex pattern of flinty coarse loams over gravelly brown earths. The soils are generally of Grade 3 ALC.

3.3 Landform and Drainage

3.3.1 The site and its environs sit on the north-western edge of the Stour Valley Slopes on the North Kent Plain. The landform is essentially flat, lying between 75 and 73m AOD. There are no open water features within the site, drainage is limited to field-side ditches which at the time of survey were dry features.

3.4 Local Land Use and Vegetation

3.4.1 The countryside local to the site is a mix of playing fields and paddocks with grazing for horses and cattle, and recreational facilities. Villages and the University of Kent and Kent College are set within a small-medium scale landscape, interspersed with parkland and woodland copses. The field pattern is defined by a limited and degraded hedgerow network, post and wire fencing and domestic garden boundaries. Woodland forms a key element in the landscape with substantial areas of Ancient Woodland around Blean to the north and west of the site.

3.5 Designations (*Plan HDA 1*)

Landscape Designations

- 3.5.1 There are no national landscape designations that cover the site or its immediate environs. The Kent Downs AONB lies to the south, beyond Canterbury and well outside the context of the site.
- 3.5.2 The site does lie within the Blean Area of High Landscape Value (AHLV), although the site which lies in LCA F2, The Stour Valley Slopes, as a whole, is not reflective of the valued landscape associated with Blean Wood AHLV. Within the emerging local plan, the AHLV is being taken forward, but re-named as a Local Landscape Designation.
- 3.5.3 ‘Canterbury District Local Landscape Designations Review and Recommendations’ carried out in January 2021 by LUC, looks at the designation in detail. The site lies within ‘The Blean woods’ candidate Local Landscape Designation
- 3.5.4 The LUC report considered the Character area context of the existing AHLV designation, this includes:
 - C2: Chestfield Farmland (100%)
 - C3: Court Lees and Millstrood Farmland (49%)
 - C4: Ford and Maypole Farmland (28%)
 - D1: Harbledown (100%) – Character area to the north of the site.
 - D2: Thornden (100%)
 - D3: Ellenden and Victory (100%)
 - D4: East Blean (100%)
 - D5: Bigbury Hill (99% Canterbury AHLV)
 - D6: Denstead (97%)
 - E2: Sarre Pennn Valley (56%)
 - E3: Amery Court (40%) – Character area to the north-east of the site
 - H1: Harbledown Fruit Belt (8% Blean, 24% Canterbury)
- 3.5.5 The site lies in Character Area F2, which is not represented within the above analysis. The Kent College land, including the site, paddock to the north and playing fields to the south-west, are the only elements of this character area that are included within the draft Local Landscape Designation.
- 3.5.6 The special qualities of the Blean Woods are set out in table format at pages 32 and 33 of the document and are represented below along with a commentary on the contribution of the site to these special qualities.

Special qualities	Evaluation	HDA comments
Local distinctiveness and sense of place	<i>A strong sense of place created by large and continuous belts of deciduous woodland on elevated ground. The Blean forms a prominent wooded ridge between Canterbury and the coast. It is a highly distinctive and unique landscape within the district forming a discrete recognisable area, with its pattern of woodland blocks, areas of heathland and acid grassland. North-south former drove routes cross the ridge between Canterbury City and coast, and evidence of history linked to the medieval period reflecting past ownership and management by Canterbury Cathedral.</i>	The site does not contain any existing woodland, although it does have a mature tree belt at the western boundary. The field in pasture to the north of the site has a stronger contribution to the trees character and species rich grassland.

	<p><i>The Blean sense of place extends across the ridge including adjacent and intervening agricultural land and is not limited to the areas within woodland. It also includes areas of agricultural land, such as around Amery Court which were opened up as clearings in the forest in the medieval period. This central agricultural area is recommended for consideration for inclusion within the LLD, despite intensive agricultural/horticultural land use in parts. It includes medieval field patterns, remains of medieval settlement, Church of St. Cosmus and Damian, and recreational routes (Crab and Winkle Way). The valley of the Sarre Penn and including the adjacent small woodland blocks on the valley slopes are a logical extension to the LLD.</i></p>	<p>The site is located at the upper edge of the valley side slopes.</p> <p>Amery Court lies to the north of the site and has stronger associations with the Kent university draft allocation to the north-east of the site.</p>
Landscape quality	<p><i>Strong ecological integrity represented by the continuous and intact blocks of ancient woodland and extensive designation at local, national and European level. The majority of The Blean is being actively managed by Conservation organisations including The Wildlife Trust, Woodland Trust and RSPB as well as active productive management for timber by Forestry England.</i></p> <p><i>Much of the woodland is within traditional coppice with standards, with areas of commercial forestry at Clowes Wood and Thornden Wood. The entire area is considered to have a high landscape quality.</i></p> <p><i>The intervening agricultural areas on the edges of woodland include a mix of modern arable fields and areas of fruit production and are characterised by their strong wooded backdrop and retain a Blean character and sense of place.</i></p> <p><i>There is an absence of detracting elements throughout, although a number of solar farms have been developed adjacent to the woodlands and a pylon line is prominent ascending the slopes at Clowes Wood. Wealdon Forest Park is a small commercial area cut into the woodland at Canterbury Road.</i></p> <p><i>The extended modern linear settlements at Blean and Tyler Hill are excluded from the designation, while to the north the A299, in a minor valley, generally marks clear boundary with the agricultural land beyond extending to the edge of the coastal settlements.</i></p>	<p>Woodland is not a feature of the Site, which is currently horse grazed pasture. The fields to the north contain signage and are influenced by Whitstable road and adjacent housing. The fields to the south are influenced by adjacent housing and the phone mast, which is a significant detracting feature. There are urban edge land uses to the east and south-west (playing fields), with the land to the north-east having a stronger association with the rural wooded edge to the north.</p>
Scenic qualities and perceptual aspects	<p><i>A strong sense of tranquillity and relative insularity created by the continuous expanses of woodland as part of one of the most extensive semi-natural woodland complexes in south east England. The pattern of woodland and open farmland, contained by a wooded backdrop, creates a strong visual character.</i></p> <p><i>The majority of The Blean is entirely undeveloped forming extensive tracts of land only accessible on</i></p>	<p>The site has limited tranquillity, due to the noise and activity associated with the road and adjacent settlement. This is illustrated on Figure 3.9 of the Canterbury Landscape Character</p>

	<p><i>foot offering a rare experience of remoteness and isolation and experience of dark skies at night. There is a general absence of incongruous/detracting features.</i></p> <p><i>Bigbury is included as part of The Blean landscape type but by virtue of its views out over Canterbury and the Cathedral is recommended for inclusion within the Canterbury City LLD.</i></p>	<p>Assessment and Biodiversity Appraisal.</p> <p>Figure 3.10 demonstrates that the site does not lie within a dark sky area.</p> <p>The site has relatively strong associations with existing settlement. The telephone mast is a detracting feature.</p>
Natural and cultural qualities	<p><i>The continuity in woodland cover has resulted in a rich habitat. Almost all of the woodland is classified as ancient origin, with clearings and rides containing heathland and acid grassland habitats. Value for wildlife is recognised at a national level and European level with over half of The Blean being designated a SSSI and approximately one third as a SAC (East Blean Wood, Ellenden Wood and Blean woods NNR).</i></p> <p><i>The matrix of woodland grassland and heathland habitat supports the rare heath fritillary butterfly and diverse and rare woodland birds including nightingales and nightjar.</i></p> <p><i>The landscape provides a living record of past woodland management practices. Much of the land was endowed to the Abbey of St Augustine and the Cathedral, with rights of pannage for pigs and herbage for cattle. Archaeological features present within the ancient woodland include bronze age barrows, sites of tile kilns and claypits. Medieval woodbanks mark boundaries of woods belonging to different religious houses in Canterbury, with associated areas of coppice and pollards. The Radfall is a distinctive example of a linear earthbank marking a former droveway for herding cattle and pigs, while the entrances to the Blean marked by 'gates' as at Radfallgate.</i></p>	<p>The site does not contain any woodland or species rich grassland. There are opportunities to create these habitats within the open space areas of the site.</p>
Recreation value	<p><i>The Blean as a whole provides a highly valued recreational resource between the coastal towns and Canterbury, offering extensive promoted routes along connected PRow. Areas owned by the Wildlife Trust, Forestry England and RSPB provide car parking facilities and a network of linked trails for cycling, riding and walking.</i></p>	<p>There are no rights of way within the proposed development area of the site. A public right of way does run through the proposed northern space, which would be retained and supplemented with additional informal routes and connections. There are rights of way at the perimeter of the site, with good links to wider routes and local facilities.</p>

Associations	<i>A historic landscape with strong associations with the medieval period of management, which can still be read in the landscape today.</i>	The field pattern in proximity to the site has been disrupted by development and changes in land-use. Footpath 30 follows a historic alignment. The field to the north-west of the site and the playing fields to the south-west of the site, used to be part of the wider Blean Woodland complex (OS map 1830-1880). The field systems within the draft university allocation frequently follow historic boundaries.
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Green Gap

3.5.7 Part of the site lies within an area designated as Green Gap. Further details are provided within the policy section of this report.

Historic Landscape and Cultural Heritage

3.5.8 There are no designated or non-designated heritage assets on the site or registered parks or gardens. The site sits adjacent to the Hothe Court Conservation Area, sharing a common boundary along a short section of Whitstable Road.

3.5.9 Listed buildings - There are no listed buildings within the site, Moat House lies to the south-east of the site off Moat Lane and Blean House lies to the east beyond Whitstable Road. Listed buildings in the immediate area, most closely associated with the site, are indicted on HDA 1.

Trees and Ecology

3.5.10 Ancient Woodland – Church Wood, part of the Blean Wood complex, lies to the west of the site. It is part of a National Nature Reserve and a SSSI. The woodland is separated from the site by a semi-improved field in pasture of species rich grassland, a Local Wildlife site referred to as Blean Pastures. The southern extent of the Local Wildlife Site includes a pond feature. The woodland forms a substantial enclosing landscape feature to the west of the site.

Public Rights of Way

3.5.11 There are a number of public rights of way (PRoW) close to the site and in the surrounding area, and one footpath crosses the eastern corner of the site.

- Footpath CB9 runs through Church Wood to the north-west of the site and continues along the southern site boundary where it joins Moat Lane.

- Footpath CB30 runs north from Oaks Park in Rough Common alongside the site's eastern boundary and crossing the eastern corner to join Whitstable Road.
- Footpath CB10 runs north from CB9/Moat Lane across the Blean Pastures LNR to the north-eastern edge of Church Wood.
- Footpath CB29A links CB9 and CB10 within Church Wood and runs east to join Whitstable Road in Blean.

4 LANDSCAPE BASELINE

4.1 Landscape Character

4.1.1 The guidance for Landscape and Visual Impact Assessment (GLVIA) defines Landscape Character as:

"A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse",

National Character Areas

4.1.2 The site sits within the National Character Area Profile 113: The North Kent Plain. The key characteristics relevant to the site and its local environs are listed below.

- *An open, low and gently undulating landscape, characterised by high quality, fertile, loamy soils dominated by agricultural land uses.*
- *The area's geology is dominated by Palaeogene clays and sands, underlain by the Chalk.*
- *Large arable/horticultural fields with regular patterns and rectangular shapes predominating, and a sparse hedgerow pattern.*
- *Woodland occurs on the higher ground around Blean and in smaller blocks to the west, much of it ancient and of high nature conservation interest.*
- *Other semi-natural habitats include fragments of neutral, calcareous and acid grassland, and also heathland.*
- *The area has rich evidence of human activity from the Palaeolithic period. Key heritage assets include Roman sites at Canterbury, Reculver and Richborough; the Historic Dockyard at Chatham; military remains along the coast; and historic parks and buildings.*
- *Large settlements and urban infrastructure (including lines of pylons) are often visually dominant in the landscape, with significant development around Greater London and the Medway Towns, as well as around towns further east and along the coast. Major rail and road links connect the towns with London.*

4.1.3 The NCA profile includes statements of environmental opportunity which includes the following:

- *SEO 3: "Protect the distinct wooded areas of the landscape, particularly through the management of nationally important, ancient semi-natural woodlands, increasing the area of broadleaved woodland where appropriate, while increasing the connectivity of*

the mosaic of associated habitats notably wooded heath and semi-improved grassland while enhancing the recreational resource.”

County Landscape Character Areas

4.1.4 *The Landscape Assessment of Kent (2004) describes the landscape of the site as part of The Blean.*

“This local area is defined by the limits of an outcrop of London Clay that includes Whitstable and Herne Bay on the north coast and the domed landscape of the Blean woodlands which drops down to the outskirts of Canterbury. The landscape rises to over 80 metres in the west around the village of Blean, gradually dropping eastwards to the 20 metre contour, towards the Wantsum and lower Stour Marshes and the coast.

4.1.5 *Wooded areas include Thornden, Clowes, and Honey Wood near Tyler Hill, Church Wood and East Blean Wood. Small pockets of Grade 2 land reflect the overlying drift deposits such as Head Brickearths found around Amery Corner and Cutballs Farm, and those deposited in the old channel of the Sarre Penn through Chislet Park, Rushbourne Manor and Hoades Court.”*

4.1.6 *“The landform of the Blean is clearly defined from the open, flat coastal plain to the rounded, wooded hills in the south of the area. The landscape elements are coherent, but piecemeal development and unsympathetic land use interrupts some of the woodland, and coastal development with road links detract from some open views. The ecological value is strong in the woodland and at the coast, but weaker in intermediate areas, despite areas of rough grassland - links between the two are also weak. Built development has a moderately negative impact on the area as a whole.”*

District Landscape Character Areas

4.1.7 The Canterbury Landscape Character Assessment and Biodiversity Appraisal (2021) categorises the District into broad landscape types which are sub-divided into local Landscape Character Areas. The site lies within the Stour Valley Slopes: F2. Key characteristics of the landscape type are:

- *‘Sloping topography underlain by a relatively complex geology, rising from 10m AOD to a distinct ridgeline in the north at 75m AOD.*
- *Blocks of priority habitat deciduous woodland connect to the Blean Woods to the north and north-west.*
- *Mixed land use including orchards, arable and sloping pasture fields plus educational establishments set within parkland and sports grounds.*
- *Historic field pattern including post-Medieval and Parliamentary enclosure and remnant parkland, supported by fragmented hedgerows.*
- *Residential development concentrated within Rough Common and Broad Oak villages, with a number of Grade II listed large farmhouses and halls, with modern infill suburban*

development. - Disturbed landscape which includes the Shelford former quarry and landfill site.

- *University of Kent campus creates a campus parkland landscape setting for buildings.*
- *Good PRow network, which provides connections to the Blean Woods and between settlements.*
- *Views south to Canterbury Cathedral and the Kent Downs AONB contrast with the more contained views north-east and west from woodland cover.'*

4.1.8 Key sensitivities for the area include the following;

- *“Distinctive sloping topography and largely undeveloped ridgeline/skyline which encloses views from, and containment for, Canterbury City – a backdrop in views over a wider area including views across the Stour Valley and the rural ridgeline setting for the Cathedral in long views from the south.*
- *Long views south over the Stour Valley and Canterbury City to the Kent Downs AONB with the Cathedral as a focal point. Cathedral is seen in a rural valley setting.*
- *Ecologically valued priority habitat deciduous woodland connected to the Blean Woods.*
- *Historic field pattern and remnant parkland character at Hales Place provides time depth.*
- *Scattered farmsteads and small halls designated nationally, and locally as listed buildings and Conservation Areas provide time depth.*
- *Rural landscape which provides a gap between adjacent small settlements including Rough Common, Tyler Hill, Broad Oak, Sturry and the University of Kent.*
- *Recreational value through a strong network of PRow including part of the Crab and Winkle Way link to Whitstable.*
- *Open parkland of the University of Kent campus.*
- *Transition to the more rural undeveloped Blean landscape to the north.”*

4.1.9 The guidance section for the character area contains the following extracts, which could be relevant to the development of the site:

Landscape Management

- *Protect and conserve ancient woodland and existing woodland priority habitat. This should include strengthening of habitat connectivity by restoring hedgerows and woodland corridors linking to the Blean Woods, and between woodlands around the University and Broad Oak. No further loss or fragmentation of ancient woodland should be permitted.*
- *Conserve and improve the traditional landscape pattern and structure, as well as increasing biodiversity interest, through the establishment and maintenance of hedgerows along historic field boundaries. Augment fragmented field boundary hedgerows with native species, replacing post and wire fencing where possible.*

Development Management

- *Conserve the local distinctiveness of historic buildings and their rural setting, particularly within the Hothe Court, Harbledown, Tyler Hill and Allcroft Grange Conservation Areas.*
- *Conserve the rural character of the landscape ensuring that it continues to play a role in the separation of Rough Common and Blean; the University of Kent and Tyler Hill; and Sturry and Canterbury City.*
- *Conserve and enhance the integration of urban edges, through native wooded boundaries and mature trees to provide visual screening and reduce the impact of built development on the open and exposed landscape.*
- *Assess new building proposals within and adjacent to the urban area to ensure that an attractive and integrated edge is formed with the adjacent rural and open recreational landscapes.*
- *Avoid extension of development on and beyond the ridgeline into the more rural Blean landscape to the north.*

4.2 Site Character and Features (HDA 2)

4.2.1 The site is situated on the southern edge of Blean village, and forms three parcels of land, currently accessed from Moat Lane. The northern parcel lies adjacent to Whitstable Road and has a long road frontage. The parcel is a narrow field in pasture, contained to the north-east by a roadside hedge 1.2m high and a parallel mature hedgerow 3-4m high) with hedgerow trees (7-8m high) to the south-west. The south-eastern and north-western boundaries are defined by housing on the edges of Rough Common and Blean village respectively. A tarmacked public footpath (CB30) runs through the parcel between Whitstable Road and Moat Lane. The field is strongly related to the Whitstable Road and forms part of the setting and separation between Blean and Rough Common.

4.2.2 The south-eastern parcel is a field in pasture used as a horse paddock and lies adjacent to the northern roadside parcel, the Kent College playing fields lie to the south. The parcel has a common hedgerow boundary to the north-east with the road-side field and post and wire fences to the adjacent public footpath (CB30) and the playing fields. Garden boundaries to properties on the Whitstable Road are generally hedged and includes a number of mature trees. The paddock and adjacent playing fields form the immediate setting to the urban edge of Rough Common.

4.2.3 The western parcel forms the majority of the site. It comprises two grass fields used for grazing and horse paddocks, the southern field includes a surfaced menage. The parcel is bounded by a tree belt to the west, comprising largely mature oaks (20m high) and occasional hornbeam and willow (18-20m high). The southern boundary is in part a native hedgerow (1.2-1.5m high) with occasional gaps, fronting onto Moats Lane and footpath CB9. The eastern boundary is a

continuous, mature and maintained native hedgerow (2.0m high). The hedgerow follows the western side of footpath CB30 from Moat Lane through to the northern roadside field.

- 4.2.4 Beyond the western parcel, adjacent to the western boundary, a field in pasture separates the site from Church Wood, which forms part of the Blean Wood NNR complex. The field is grazed by cattle and comprises semi-improved grassland, and isolated groups of mature trees. It is designated as a Local Nature Reserve (LNR), Blean Pastures. The pasture and LNR continues along the southern boundary of the site, beyond Moat Lane. Further south the pasture gives way to more playing fields. Trees and a partly intact hedgerow bound the fields in pasture.
- 4.2.5 Church Wood, which lies to the west of the site, is a mixed deciduous woodland of oak, ash, and hornbeam, and includes an understorey with a high proportion of evergreen holly. The woodland is designated as Ancient Woodland and forms part of the Blean Woods complex, a National Nature Reserve (NNR) and SSSI. Footpaths CB9, CB9A and CB10 run within or are adjacent to the woodland. A telecommunications mast and compound lie adjacent to the woodland edge and sit adjacent and between the Blean Pastures LNR.
- 4.2.6 The site's character is consistent, in broad terms, with aspects of the National, County and District scale landscape character assessments, however it is not part of the Stour valley or the prominent ridge line to the north of the district character area and it is not part of an open parkland with extensive or long views. The site is level, contained by Church Wood and mature hedgerows and mature trees. It is a mixed landscape of recreation, horse paddocks and grazing. The telecommunications tower, to the south-west of the site, is a significant detractor to the site and the local area.
- 4.2.7 As noted in the District assessment the site benefits from an extensive footpath network and the links to the Blean Woodlands. The site and its immediate environs form a transition to the more undeveloped Blean Landscapes to the north and west, with the field to the north of the site displaying more of the rural characteristics associated with the Blean. There is little sense of place and tranquillity, particularly close to the Whitstable Road and playing fields. Tranquilly and a sense of place is experienced within the woodland within a relatively short distance from the site largely as a result of the closed understorey of holly. The green infrastructure, in the form of hedgerows and mature trees does serve to compartmentalise the site and the surrounding landscape such that the road and adjacent housing are contained and visually separate, which reduces their effects on the wider landscape.

5. VISUAL BASELINE

5.1 Visual Assessment Methodology

- 5.1.1 The visual baseline serves to establish the type of Visual Receptor (VR) that may be affected by the proposed development, the extent and character of existing views, the contribution that the site makes to each view/local visual amenity and the susceptibility to change in views. This in part correlates with the degree to which the site is visible from a VR.
- 5.1.2 A visual appraisal of the site was undertaken from public roads and footpaths. Views were assessed based on 1) existing visibility 2) views after development. Views of the proposed development were estimated by visualising the scale and form of the proposed dwellings, car parking and associated tree planting. Views from properties could not be assessed from the houses themselves; in most cases, the likely extent of the view could be adequately estimated from adjacent roads or paths. Views from some properties were identified using a reverse view, i.e. an assessment of the extent to which a property was visible in views from within the site (or its perimeter) looking outwards.
- 5.1.3 The visual appraisal is based on a grading of degrees of visibility. There is, in any visual appraisal, a continuity of degrees of visibility from not visible to fully open in the view. To indicate the degree of visibility of the site from selected locations, that continuum has been divided into four categories, as follows:
- None: No view (no part of the site or proposed development is discernible);
 - Glimpse: Only a minor area of the site or proposed development is discernible and/or the view is transient or at such a distance that it is difficult to perceive in the wider view, or sequence of views;
 - Partial: The site or proposed development forms a relatively small proportion of a wider view. There are open views of part of the site or proposed development such that it is easily visible as part of the wider view;
 - Open: There are open views of the site or proposed development such that it forms a substantial part (is a dominant element) of the overall view and affects its overall character and visual amenity; or the site or proposed development is the dominant feature of the view, to which other elements become subordinate and where the site/proposed development significantly affects or changes the character of the view.
- 5.1.4 The third edition of the Guidelines for Landscape and Visual Impact Assessment, GLVIA 3, (2013) is well established as providing 'best practice guidance' when undertaking landscape and visual impact assessment (LVIA). With respect to visual impact the focus of GLVIA3 and LVIA is on public views and public visual amenity.

5.1.5 Residential Visual Amenity Assessment (RVAA) is a stage beyond LVIA and focusses exclusively on private views and private visual amenity. A RVAA may be used by the decision maker when weighing potential effects on Residential Amenity in the planning balance.

5.1.6 In March 2019, The Landscape Institute published technical guidance (TGN 2/19) on Residential Visual Amenity Assessment (RVAA). Residential visual amenity is defined within the guidance as:

‘The overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage. It represents the visual component of Residential Amenity.’

5.1.7 Paragraphs 1.5 and 1.6 of this technical note state that:

‘1.5 Changes in views and visual amenity are considered in the planning process. In respect of private views and visual amenity, it is widely known that, no one has ‘a right to a view.’ This includes situations where a residential property’s outlook / visual amenity is judged to be ‘significantly’ affected by a proposed development, a matter which has been confirmed in a number of appeal / public inquiry decisions.

1.6 It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself, this does not necessarily cause particular planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before.’

5.1.8 Having regard to the distinction drawn in planning determinations between public views and private views, the likely changes that may be expected to be experienced by private residents in terms of whether the changes to the views experienced by local residents are of sufficient severity that it may reach the Residential Visual Amenity Threshold are assessed. The ‘threshold’ is defined in the technical guidance as:

‘The threshold at which the visual amenity of a residential property is changed and adversely affected to the extent that it may become a matter of Residential Amenity and which, if such is the case, competent, appropriately experienced planners will weigh this effect in their planning balance.’

5.1.9 The baseline visual appraisal was carried out in August 2022 and was updated in April 2024. Views of the site are likely to increase in winter months when vegetation is not in leaf.

5.2 Existing Site Visibility *(plan HDA 3 and Supporting photographs)*

5.2.1 The wooded context and flat topography of the landscape to the west and south of the site precludes views of the site from the wider area. The visual envelope of the site is very limited, and includes views from Whitstable Road, Moat Lane, footpaths CB9, 10 and 30, which have partial or open views into parts of the site. The site as a whole is not visible from one public vantage point.

Views from the south and west (VP photograph locations 1-5 and 9 and 10)

5.2.2 Photograph 2 illustrates the view north from Moat Lane/PRoW CB9, across the main part of the site and the extent of the proposed development area. The view includes glimpses and partial views of housing in Blean and Rough Common, set within a treed backdrop to the site. Whitstable Road and the associated traffic is screened from view by the site's internal hedgerows. The extent to which there is a small gap between settlements is illustrated on photograph 1. Views from the south are contained by hedgerows and the southerly extension of Church Wood (photograph 3) there are no views of the site from New Road south of Rough Common or the associated public footpath.

5.2.3 Photograph 1 illustrates the view north along PRoW CB 30, a tarmacked route to Whitstable Road. The view includes the playing fields and paddock to the north, which form the majority of the land within the green gap policy area south of Whitstable Road. Housing along Whitstable Road, in Rough Common, backs onto the playing fields although the boundary is softened by hedges and mature trees. The gap area has an urban edge character to it by virtue of the housing and recreational land uses. The site lies to the west and is contained by the mature oak trees to the south and the continuous hedgerow to the west of the PRoW.

5.2.4 To the west of the site the communications tower has a detracting influence on the local landscape (photograph 4), being visible from the local footpaths and roads. Beside the tower enclosure the fields, Blean Pastures, form a pastoral buffer between the site and Church Wood. The filtering effect on the mature oak tree belt along the western boundary of the site adds to the separation between the woodland and the proposed development area (photograph 5). From within the woodland there are very limited views out to the adjacent pastoral field and the site as a result of the dense understorey (photograph 10). Views from the edge of the wood along footpath CB9 are restricted by intervening trees and scrub (photograph 9).

5.2.5 Footpath CB10 affords glimpses and partial views of the proposed development area from Blean Pastures, however these views decrease in extent towards the northern end of the path (photograph 6).

Views from the north

- 5.2.6 Views from public vantage points to the north are limited to views from Whitstable Road. Footpaths north of the site are either located between residential houses or behind substantial trees and continuous established hedgerows. Viewed from the southern end of Blean village, on the north-side pavement, the northern parcel of the site is open to view above the boundary hedgerow. The more substantial internal hedgerow to the south of the parcel precludes views of the remaining areas of the site. Given the height of the hedgerow and hedgerow trees, as compared with the height of two storey housing (as evidenced by no. 30 Whitstable Road - see photograph 7) the proposed development would be substantially screened by the existing green infrastructure. There would also be a section of the frontage which would be free of development.
- 5.2.7 Viewed from the southern edge of Blean (Photograph 8) the existing gap between Blean and Rough Common can be seen as a relatively narrow feature largely appreciated to the south of the road. Whilst residential development is apparent and open to view to the north side of the road, the site adjacent to the road provides some additional depth to the gap. Foreground trees and scrub, together with the more substantial internal hedgerows largely screen the majority of the site from view from the Whitstable Road.
- 5.2.8 Views from footpath CB30, south of the road-side field include the Paddock and playing field together with the college buildings and Park Cottage. The views are localised, long views being truncated by the tree and woodland cover around the site.

6 ASSESSMENT OF BASELINE CONDITIONS

6.1 Landscape Quality

- 6.1.1 The site land uses comprise horse paddocks and small-scale pasture. The site has little internal landscape structure or landscape features of merit. With the exception of a short section of tarmacked footpath, CB30, footpaths do not cross the site but do lie adjacent to the southern and parts of the eastern and western site boundaries. The land uses are commonplace in the local area, and are urban edge in character. The site is enclosed and relatively quiet but not tranquil as it lies adjacent to the urban edge and Whitstable Road, a busy route into Canterbury. The site has been assessed as being of moderate landscape quality.
- 6.1.2 The boundary features, the western tree belt, northern and eastern hedgerows and small trees groups along the southern edge of the site are more significant and long-standing landscape features and add to the wider landscape infrastructure. They are of moderate- high landscape quality.

6.2 Landscape value

6.2.1 The site is part of a designated area of high landscape value although the site sits outside the landscape character areas which most contribute to the qualities and character of the Blean Wood AHLV. The site lies within area F2 the Stour Valley Slopes, an area not assessed in the LUC reappraisal of the Blean Woods AHLV. Assessment of LCA F2 identified low landscape value and its main function was considered to be the contribution to views towards Canterbury and the open character of the LCA. The site does contribute to either function, rather it is an enclosed landscape. The paddocks, grazing and playing fields that make up the site and its immediate environs are unremarkable and common place features in the local landscape and there are no semi-natural habitats within the site. The site does however make a limited contribution to the continuity of landscape around the adjacent LNR and Church Wood, part of the Blean Woods complex.

6.2.2 There is limited public access within the site and moderate visual access from public footpaths which overlook the site. The enclosing nature of the boundary vegetation and the wooded character of the local landscape and existing residential development surrounding the site contain many views out from the site to the wider countryside. There is no inter-visibility between the site with Canterbury or the AONB to the south. There are a limited number of views from roads in the local area and the site is not widely visible in the local landscape. Its contribution to the visual context of the wider landscape character is very limited. Overall, the landscape and visual value of the site has been assessed as Medium.

6.3 Landscape and Visual Sensitivity

6.3.1 The sensitivity of the site to residential development is determined by a combination of landscape value and the susceptibility to development. The site is a green field site, but it contributes little to the character and appearance of the wider landscape. It has a small visual envelope and has some urban edge influence from the adjacent residential and educational land uses. The communications tower to the south-west of the site is also a detracting factor. The overall sensitivity of the site is judged to be Medium.

6.4 Perceptual/Experiential Landscape

6.4.1 The site forms part of an enclosed landscape of paddocks and urban edge land uses and recreation. To the west it lies relatively close to the Blean Woods complex but is buffered by existing pasture and a native tree belt. The site is largely excluded from views from the edge of the woodland, and from within the woodland by an evergreen understorey and treed margins extending out into adjacent pasture. The site does not contribute to the character or tranquillity of the woodland.

6.4.2 To the north and east the site's value, in terms of its scenic beauty, tranquillity and remoteness is limited by its current land uses, its proximity to the villages of Blean and Rough Common and

the Whitstable Road and the equestrian paraphernalia in the south-west of the site. The communications tower is also a detracting feature in the local landscape.

- 6.4.3 Visually, the site is generally contained and inward looking. There are some views of the northern and eastern parcels of the site from the adjacent housing which lies within the Hothe Court conservation area, however the majority of the site does not form part of the immediate landscape setting.

7 LANDSCAPE AND VISUAL APPRAISAL

7.1 Description of the Proposals

- 7.1.1 The proposed development for the site would include approximately 90, two storey dwellings at an average density of 35 dwellings per hectare. The number of dwellings on the Site has been reduced from the initial concepts in order to accommodate an enhanced landscaped area and to address the Council's concerns regarding the purported impact of the development on the Green Gap and coalescence.
- 7.1.2 The main road access would be via the Whitstable Road, at the north-eastern corner of the site. The remainder of the two north-eastern fields would become semi-natural open space with new woodland planting and informal paths. The woodland would maintain and reinforce the sense of separation between Blean and Rough Common within the Green Gap, by reducing the intervisibility between the two. It would also serve to screen the proposals from the road and create a new, complementary area of woodland that would follow the landscape guidance for the character area (see paragraph 4.1.9 of this report).
- 7.1.3 An additional area of open space would be provided to the south of the development, providing a 100m wide landscape buffer between the proposals and Rough Common, located to the south. This area would retain the existing trees along the southern boundary and provide additional complementary native tree planting, which would reduce the visibility of the built form over time and provide habitat connections across the site.
- 7.1.4 A new local public open space, located to the east of the site would include play provision, wetland features and tree and shrub planting set out as informal open space. New pedestrian footpath links, across the park, would link to the public rights of way network and linear open spaces running to the west and south of the site. SuDS attenuation basins would be constructed with associated open space and tree planting along with the retention and enhancement of the majority of the existing trees and boundary hedgerows, including all of the mature oak trees located at the western boundary of the site. Avenue tree planting and trees within the development are proposed together with native and amenity shrub planting.

7.2 Predicted Landscape Effects

- 7.2.1 The scheme would retain all the existing trees along the site's boundary and will retain the majority of the hedgerows. In order to deliver a vehicular access to the development, a section of the hedgerow that forms the boundary to Whitstable Road and the parallel hedgerow would be removed. Any hedgerow removed to enable the visibility splays associated with the new junction would be replaced behind the splays.
- 7.2.2 The most noticeable landscape effects would be following construction. There would be the loss of a field in pasture and a number of horse paddocks. The site would change to housing enclosed by boundary hedgerows and trees, fronted by a new, semi-natural, public open space improving the sense of separation between the settlements along Whitstable Road and providing new wooded links between the trees associated with the University, the existing tree line to the western boundary of the site and Blean Woods. The open space would also provide a landscape buffer to the Hothe Court conservation area and the adjacent properties on Whitstable Road.
- 7.2.3 The magnitude of change within the site and adjacent fields is likely to be Medium adverse following construction, when the changes are most pronounced. 15 years post completion, the proposed landscape scheme would have established. The existing and proposed planting within the site would largely contain the site and internal tree planting filter residual views of new housing. Within the site, retention of the majority of the northern hedgerow together with extensive new planting would result in an overall increase in characteristic features and improve the habitat and landscape diversity within the site. The adverse landscape effects would be temporarily Moderately adverse, reducing to Minor adverse after 15 years.

7.3 Predicted Visual Effects

- 7.3.1 The site has a very limited visual envelope and the proposed development would not have a visual impact on the wider landscape. Close to the site there would be open and partial views from footpaths CB9, 10 and 30. Views to the south and east would include views of Rough Common and playing fields which have an urban edge character, views to the west are more rural in character. Initially there would be a Moderate adverse effect on views. However with the establishment of new tree and hedgerow planting and with the management of existing hedgerows (allowing maintained hedgerows to grow out to 4-5m) the new housing would be visually contained and the visual effects reduced. After 15 years the effects are likely to reduce to Minor adverse.
- 7.3.2 Viewed from Whitstable Road, the scheme would be substantially screened from view by the retained internal hedgerows. Existing trees within the hedge are 6-8m in height and would substantially screen the new development. New tree and shrub planting to the proposed public open space would, once established further filter and screen the new houses. The sense of an

undeveloped frontage to the road, between Blean and Rough Common would be maintained and the new tree planting would reduce the existing intervisibility between the two settlements. The initial visual effects are likely to be Minor adverse and following the establishment of the park and proposed landscape planting there would be an enhancement to the road scene with a Moderate beneficial effect.

7.3.3 Views from with Church Wood would be unaffected by the development, however footpaths at the margins of the woodland would have glimpses of new houses at completion of the scheme, a Minor adverse effect. With the maturing of the landscape proposals there are unlikely to be any residual adverse effects.

7.3.4 Properties backing onto the college playing fields are likely to have glimpsed views of the proposed development. A change in the management of the existing hedgerow to the eastern boundary of the site, to allow it to grow up to 4-5m, along with additional tree planting along the boundary, would substantially screen the new housing from view. The outlook from properties on the north-side of Whitstable Road would be improved with the proposed park and additional tree planting.

8.0 Policy Considerations

8.1 National Planning Policy Framework

8.1.1 The proposed development would provide an attractive, high-quality design, which has a strong sense of place, in keeping with the guidance set out in the NPPF and the National Design Guide. The site layout has been shaped by the initial landscape and visual baseline studies to take account of local landscape character and the surrounding built environment and landscape setting. Views from, and the landscape setting to, the Hothe Court conservation area have been a consideration in establishing the location and extent of housing development proposed.

8.1.2 The native tree and woodland planting proposed within the site have been designed to fit in with the guidance set out within the Canterbury Landscape Character Assessment and Biodiversity Appraisal (2021) and would conserve and enhance the landscape setting to the protected Blean Woodland. This accords with the principles set out within paragraph 180 of the NPPF.

8.2 Existing Local Policy

8.2.1 The proposals would be consistent with current policy that relates to landscape character and the effects on visual amenity.

Policy LB2 Areas of High Landscape Value

8.2.2 Policy LB2 states that:

“Within these areas, development will be considered in relation to the extent to which its location, scale, design and materials would impact on or protect the local landscape character and

enhance the future appearance of the designated landscape and its heritage and nature conservation interest. Development proposals that support the landscape character (including settlement character), and have no significant impact upon historic setting, archaeological or nature conservation interests, where relevant, will be permitted.”

8.2.3 The proposals would not affect the Blean Woods directly or the Blean Pastures which lie adjacent to Church Wood, which form the immediate setting to the woods. The existing oak and hornbeam tree belt which lies between the site and Blean Pastures would be retained and enhanced. Additional tree and woodland planting would be introduced at the site boundaries and within the two paddocks to the north-east of the site, which would further screen the development and enhance the habitat connectivity required of the policy.

8.2.4 The site lies within the AHLV, but outside the Blean Woods complex (as defined on the policy map for the regulation 18 Local Plan) and the policy supporting text identifies the following:
b. “The Blean Woods AHLV identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands.”

Policy LB4 Landscape Character Areas

8.2.5 The policy states that:

“Proposals for development, and associated land use change or land management, should demonstrate that they are informed by, and are sympathetic to, the landscape character of the locality. In considering development proposals, the City Council will take every opportunity to reinforce, restore, conserve or improve, as appropriate, the landscape character of the area in which development is proposed.”

8.2.6 The proposals, as set out on the concept masterplan, demonstrate a positive response to the baseline assessment of the site and its environs. The proposals have been developed with regard to the Canterbury Landscape Character Assessment and Biodiversity Appraisal (2021). The site is well related to existing settlement and whilst there would be a loss of green field land to new housing the retained open land would be conserved and enhanced as public open space. Development of the site would not have a substantial adverse effect on the surrounding local landscape or its character.

8.2.7 The proposals respond to criteria a-e of the policy in the following ways:

- a. The development would be appropriate for the area;
- b. The proposals have been sited in order to minimise predicted landscape and visual effects and maximise the potential of the site.

- c. Existing features would be retained and enhanced and new complementary features would be created. These proposals would contribute positively to local landscape character.
- d. The scale, design, materials and landscaping measures are considered to be appropriate for the character area that the site sits within.
- e. The proposals would create new habitats and woodland connections that would be beneficial for local wildlife.

Policy OS6 Green Gaps

8.2.8 Within the Green Gaps development will be permitted where it does not:

- a. Significantly affect the open character of the Green Gap, or lead to coalescence between existing settlements;*
- b. Result in new isolated and obtrusive development within the Green Gap.*

Proposals for open sports and recreational uses will be permitted subject to there being no overriding conflict with other policies and the wider objectives of the Plan. Any related built development should satisfy criteria (a) and (b) above and be kept to a minimum necessary to supplement the open sports and recreation uses, and be sensitively located and of a high quality design.”

8.2.9 The supporting text particularly relevant to the Blean – Rough Common gap is set out at para 11.45 of the adopted Local Plan and states that:

“The green gaps have been specifically identified between built up areas, such as villages or urban areas, which are gradually expanding, particularly along the road frontages. The designations have been limited to ‘pinch points’, where settlements, often due to linear expansion, are at a particular risk of coalescence”.

8.2.10 The existing gap is specifically designated to protect the separation of Blean and Rough Common at the ‘pinch point’ on the Whitstable Road, i.e. the immediate and adjacent fields in pasture and the playing fields. The existing gap is narrow and there is a high level of intervisibility between the two settlements. The proposals maintain and enhance the fields within the gap policy area and do not affect the adjacent playing fields. The proposed development would have no effect on the gap north of the Whitstable Road and present only a marginal visual intrusion into the perception of gap to the south of the road. The landscape proposals include new tree and woodland planting to the fields adjacent to the road and to the eastern boundary of the development area. As these trees become established the views of the development are likely to reduce to views of both the proposed development and reduce the intervisibility between existing housing at the edges of the respective settlements. It is predicted that this would result in a Negligible adverse effect on the existing gap between settlements in the longer term.

8.2.11 In order to maintain the sense of separation between the development and Rough Common the concept masterplan identifies a 100m offset from the junction to create an area of open space that could be included within the future Green Gap. It would be possible for the land proposed for inclusion within the Gap to reinforce the existing separation between Blean and Rough Common to the south.

Policy HE6 Conservation Areas

8.2.12 The policy states that:

“Development within a conservation area should preserve or enhance its special architectural or historic character or appearance. Development, in or adjoining a conservation area, which would enhance its character, appearance, or setting will normally be permitted. Important features or characteristics, which contribute to its special character and setting, that need to be protected, include; plan form, buildings, architectural features, built form, archaeological sites, materials, trees, streets and spaces and the relationships between these features.

Development within, affecting the setting of, or views into and out of, a conservation area, as shown on the Proposals Map and all Insets, should preserve or enhance all features that contribute positively to the area’s character, appearance or setting.”

8.2.13 The Hothe Court conservation area extends down the eastern side of the site, lying adjacent to part of the road-side field and adjacent paddock within the site. The rural character of these fields would be retained in the scheme and their character enhanced with new native tree and shrub planting. The proposed housing would be set back from the immediate setting to the conservation area behind the established hedgerow and trees. The views into and out of the conservation area would be largely unaffected by the proposals. Listed buildings within the conservation area, namely Moat House and Blean House are located within existing built development with playing fields associated with the college between the site and the edge of the conservation area. There would be no appreciable effect on the landscape setting to the listed buildings. It is assumed that a detailed heritage response to this policy would be undertaken by others.

8.3 Emerging Local Policy

8.3.1 The proposals have also been assessed against emerging Local Policies within the regulation 18 Local Plan, for completeness.

DS19 – Habitats, landscapes and sites of local importance

8.3.2 This draft policy incorporates guidance regarding six types of local designation, which are covered under separate numbered points. Points 3 (Local Landscape Designation) and 5 (Green Gaps) are considered the most relevant to this site. The site is included within the proposed Blean Woods Local Landscape Designation, but displays few – if any – of the special

qualities outlined within the Canterbury District Local Landscape Designations Review and Recommendations for the Blean woods candidate Local Landscape Designation.

8.3.3 The proposals respond to criteria a-c of point 3 in the following ways:

- a) The development would be appropriate for the area and would respond positively to the guidelines set out within the Canterbury Landscape Character Assessment and Biodiversity Appraisal (2021);
- b) The proposals include woodland and tree planting, which are a key component of local landscape character and would reduce the urban influence of adjacent settlement. There is the potential for the proposals to enhance the future appearance of the Blean Woodland.
- c) Further specialist work would be required, however it is considered possible for the proposals to come forward without significant impacts on the historic setting, archaeological or nature conservation interests of the site.

8.3.4 Point 5 of the emerging policy relates to Green Gaps and stipulates that only proposals for sports and recreation uses would be permitted. This seems overly prescriptive and would not allow for beneficial land uses associated with habitat creation or other land uses that would not necessarily affect the openness of the gap.

8.3.5 The proposals would seek to introduce new recreational provision within the gap, in accordance with the emerging policy, but would also look to enhance the character and appearance of the gap through new semi-natural tree and woodland planting. This would enhance habitat connectivity and would enhance perceived separation by reducing the intervisibility between the two settlements. The proposed site access would pass through the gap, however this is located within an area of the gap that is already compromised by settlement to the east and would have a limited effect on the openness of the gap. The approach would be consistent with the proposals for the regulation 18 draft allocation associated with the University of Kent.

Policy DS22 - Landscape Character

8.3.6 The draft policy wording for item 1 is the same as adopted policy LB4 and the same comments apply. Item two sets out criteria (a-g) which need to be considered in order for development to be permitted.

8.3.7 The proposals respond to criteria a-g of the policy in the following ways:

- a. The proposals have been informed by the district Landscape Character Assessment;
- b. The location, layout, scale and design of the proposals have been developed with consideration for the sensitivity of the Stour Valley Slopes character area and follow the associated Landscape Guidelines.

- c. The visual envelope of the site and proposals is limited and there would be no effects on important long distance views. Effects on the local rights of way network (adjacent to the site) are judged to be Minor adverse in the long term.
- d. Existing features would be retained and enhanced and new complementary features would be created.
- e. The proposals have been sited in order to minimise predicted landscape and visual effects and maximise the potential of the site.
- f. There would be no landscape or visual effects with regards to the historic city of Canterbury.
- g. The site has limited tranquillity, due to the noise and activity associated with the road and adjacent settlement. This is illustrated on Figure 3.9 of the Canterbury Landscape Character Assessment and Biodiversity Appraisal.

Policy DS23 – The Blean Woodland Complex

- 8.3.8 The site falls outside the Blean Woodland Complex and the proposal has been designed to compliment the woodland.

Policy DS26 Historic Environment and Archaeology

- 8.3.9 The potential effects on heritage assets would be addressed by appropriate professionals, however the proposed housing would be set back from the immediate setting to the conservation area and views into and out of the conservation area would be largely unaffected by the proposals.

9 CONCLUSIONS

- 9.1. The landscape proposals for the site have been derived from an assessment of local landscape character, settlement pattern and the setting to the Hothe Court conservation area. The proposed development is located outside of the Green Gap but accessed from Whitstable Road. The paddocks fronting the road would be retained as semi-natural open space typified by woodland and tree planting, which would maintain and enhance the separation between settlement. The paddock to the north of the existing pitches (also within the Green Gap) would become an area of open space, with a children’s play area and recreational routes, which would complement existing land uses. The southern part of the site (outside the Green Gap) would also be retained as open space, maintaining a 100m landscape buffer to Rough Common.
- 9.2 Where possible key existing landscape features would be retained and protected throughout the course of the development. The landscape scheme, comprises informal semi-natural open space, tree and woodland planting, hedgerows, scrub and wetland habitat creation. The landscape strategy, once established, would provide a soft landscape setting to the

development. There would be no significant adverse effects on the landscape character of the local landscape and the separation between Blean and Rough Common would be maintained. The landscape setting to the Hothe Court conservation area would also be maintained.

- 9.3 There is a dense and regularly maintained hedgerow to the east of the development area which if left to mature to 4-5m would provide significant screening to the new development. Existing trees and hedgerows to the site would be enhanced with further tree planting which would soften the boundaries to the development and the southern edges of Blean village. New tree and native scrub planting to the western boundary would reinforce the habitat connections to the Blean Woods and buffer the immediate pastoral setting to the Church Wood.
- 9.4 The character of the site would change from a field in pasture and paddocks to residential development. This would have an initial adverse effect on the character of the site, although the changes would not have a significant effect on wider landscape character areas. The adverse effects would reduce as the proposed landscape planting becomes established. Open space to the north of the development would provide a suitable buffer between the new development and the conservation area and maintain the sense of separation between Blean and Rough Common.

HDA Control and Quality Assurance Record

Project Title: Whitstable Road Canterbury LS
 Project Reference: 2079.40
 Document Title: Initial Landscape and Visual Appraisal
 Commissioning Party: Hallam Land Management (HLM).

Issue	Description	Date of Issue	Signed
1	First draft Version 1	22/05/2024	
2	Version 2	24/05/2024	

	Personnel	Position
Author	Tanya Kirk	Director
Approved for issue	Tanya Kirk	Director

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Appendix 1:

Extract from the Canterbury Landscape Character Assessment and Biodiversity Appraisal

Representative Photographs



Orchards with post and wire fencing and pylons



Educational and recreational facilities



Shelford landfill and gas recovery



Den Grove Wood



Rolling grazing land with parkland character



Views across the Stour Valley to Canterbury City and the Kent Downs AONB beyond

Landscape Description

Key Characteristics

- Sloping topography underlain by a relatively complex geology, rising from 10m AOD to a distinct ridgeline in the north at 75m AOD.
- Blocks of priority habitat deciduous woodland connect to the Blean Woods to the north and north-west.
- Mixed land use including orchards, arable and sloping pasture fields plus educational establishments set within parkland and sports grounds.
- Historic field pattern including post-Medieval and Parliamentary enclosure and remnant parkland, supported by fragmented hedgerows.
- Residential development concentrated within Rough Common and Broad Oak villages, with a number of Grade II listed large farmhouses and halls, with modern infill suburban development.
- Disturbed landscape which includes the Shelford former quarry and landfill site.
- University of Kent campus creates a campus parkland landscape setting for buildings.
- Good PRoW network, which provides connections to the Blean Woods and between settlements.
- Views south to Canterbury Cathedral and the Kent Downs AONB contrast with the more contained views north-east and west from woodland cover. Skyline backdrop in views from the south providing 'setting' for the Cathedral.

Natural Influences

The Stour Valley Slopes rise above the valley and form a definite ridge north of Canterbury City. The area rises from 10m AOD in the south-east along the railway line to 75m AOD in the north-west adjacent to the Blean Woods. The area is underlain by London Clay with Woolwich and Reading beds sandstones at the base of the valley. There are deposits of river terrace gravels in the south-west around The Grove.

There are small watercourses and springs throughout the area, and the soils are seasonally waterlogged. Around Rough Common the soils form a complex pattern of flinty coarse loams over gravelly brown earths which are mostly under grass. The lower slopes towards Broad Oak have the same deep, well-drained, often stoneless soils as the fruit belts areas. These variations in soils create a mixed land cover.

Blocks of woodland occur throughout the area, many of which are ancient and priority habitat deciduous woodland. The woods are part of and connected to the adjacent extensive ancient Blean Woods. Part of the West Blean and Thornden Woods Site of Special Scientific Interest (SSSI) extends into this area, covering Barton Wood, Shelford Wood and Beecham Wood in the east. Brickhouse Wood in the north is part of the Little Hall and Kemberland Woods and Pasture Local Wildlife Site (LWS).

There are small areas of priority habitat good quality semi-improved grassland connected to the woodland, including in the north-west, designated as the Blean Pastures LWS.

The undeveloped grass slopes are in use as medium-sized pasture fields, particularly east of St Stephen's Hill. There are larger arable fields east of Shalloak Road, and small areas of traditional orchard south of Broad Oak. Hedgerows are often fragmented and only form a loose network of ecological

corridors linking the woodland blocks. Polytunnels for fruit growing are a dominant feature in the farmed landscape to the east.

Cultural Influences

This area once formed part of the Blean Woodlands and much of the woodland clearance may be the result of the thriving 9th century pottery and ceramics industry and subsequent Medieval brick and tile manufacture that relied on the use of local clay and charcoal. The brick and tile industry, which was centred on Tyler Hill, continued until the 19th century.

The landscape pattern in the area is essentially Medieval. The Kent HLC categorises much of the area as having a post-Medieval field pattern, with rectilinear wavy boundary enclosure pattern in the south-east and straight-edged Parliamentary enclosure in the centre and west. There were also large areas of orchard in the north-east.

The former Hales Place estate lies to the east of St. Stephen's Hill. It was originally built for Archbishop Stephen Langton in 1227 and was a visiting place for Archbishops until the Dissolution. The estate was bought by the Hales family in 1675 who developed the house and parkland. Hales Place has been developed for housing, however remnant parkland in the form of parkland trees is still present including a group of trees known as 'The Square' to the north of the housing area.

The former Canterbury to Whitstable railway line ran through this LCA. The Tyler Hill Railway Tunnel along the route, now within the University of Kent campus, is the world's first modern railway tunnel on a passenger steam railway and is the only Grade II* listed structure in the area. The former railway line is now in use as the popular Crab and Winkle Way cycle route.

Modern development at Rough Common and Broad Oak has grown up around the scattered Grade II listed small halls and large farmsteads. The detached and semi-detached red brick houses are generally set among mature trees, which softens their appearance. There are a number of Conservation Areas which overlap into this area: Hothe Court; Harbledown; Tyler Hill; Allcroft Grange (Hackington); and a small area of Sturry in the south-east.

The University of Kent is sited along the ridgeline initially built in the 1960s. It is a campus style development with medium to large blocks of buildings set within generous amounts of open space.

The landscape has historically been disturbed by quarrying and the Shelford landfill site in the east is a dominant feature. There is a solar farm west of Broad Oak. A number of electricity pylon routes cross the area and there is a telecommunications tower north of Rough Common, plus prominent floodlighting associated with sports pitches.

The road network was established in medieval times as drove roads to the north Kent coast, and the majority of the current roads follow this pattern. Roads are generally steep and lined by mature trees or hedgerows, although there is some fragmentation.

Perceptual Influences

There are extensive views over Canterbury City from the south facing slopes with the Cathedral as a notable focal point. The best vantage points for these views are the slopes beneath the University, Neal's Place and across the grazed pastures of St Stephen's Hill at on the slopes towards Broad Oak/Sturry. At Neal's Place the view is framed by the landform of the open space. Following the valley side towards Broad Oak, views of the historic city diminish although there are

views to across the open valley setting as well as the more industrial landscape of the Stour Valley along the Sturry Road.

Where the gradient is less steep the enclosure from woodlands and buildings restricts all but local views in and out. This occurs to the north of Rough Common and north of the University beyond the steepest part of the slope as the landform starts to level and form part of The Blean and a more rural enclosed landscape.

This LCA with its pasture slopes backed by woodland on the ridge provides containment for Canterbury City and forms a backdrop for views from the City, including the World Heritage Site, and the eastern side of the Stour Valley. The University buildings, St Edmund's school and water tower at Neal's Place are striking elements on the ridgeline in many views from within and around the City.

There has been considerable fragmentation of the landscape, as shown by the Shelford landfill site and growth and expansion of the University of Kent. In contrast, the slopes from St. Stephen's Hill to Broad Oak are largely undeveloped and hence are more rural in character.

The electricity pylons through the area are a detracting feature, particularly where they appear on the highest ground. There has been hedgerow fragmentation and replacement with post and wire fencing. This combined with an apparent lack of management lends a neglected character to some parts of the landscape, particularly around Broad Oak. There is little tranquillity within the area due to its proximity to Canterbury City and the University of Kent campus.

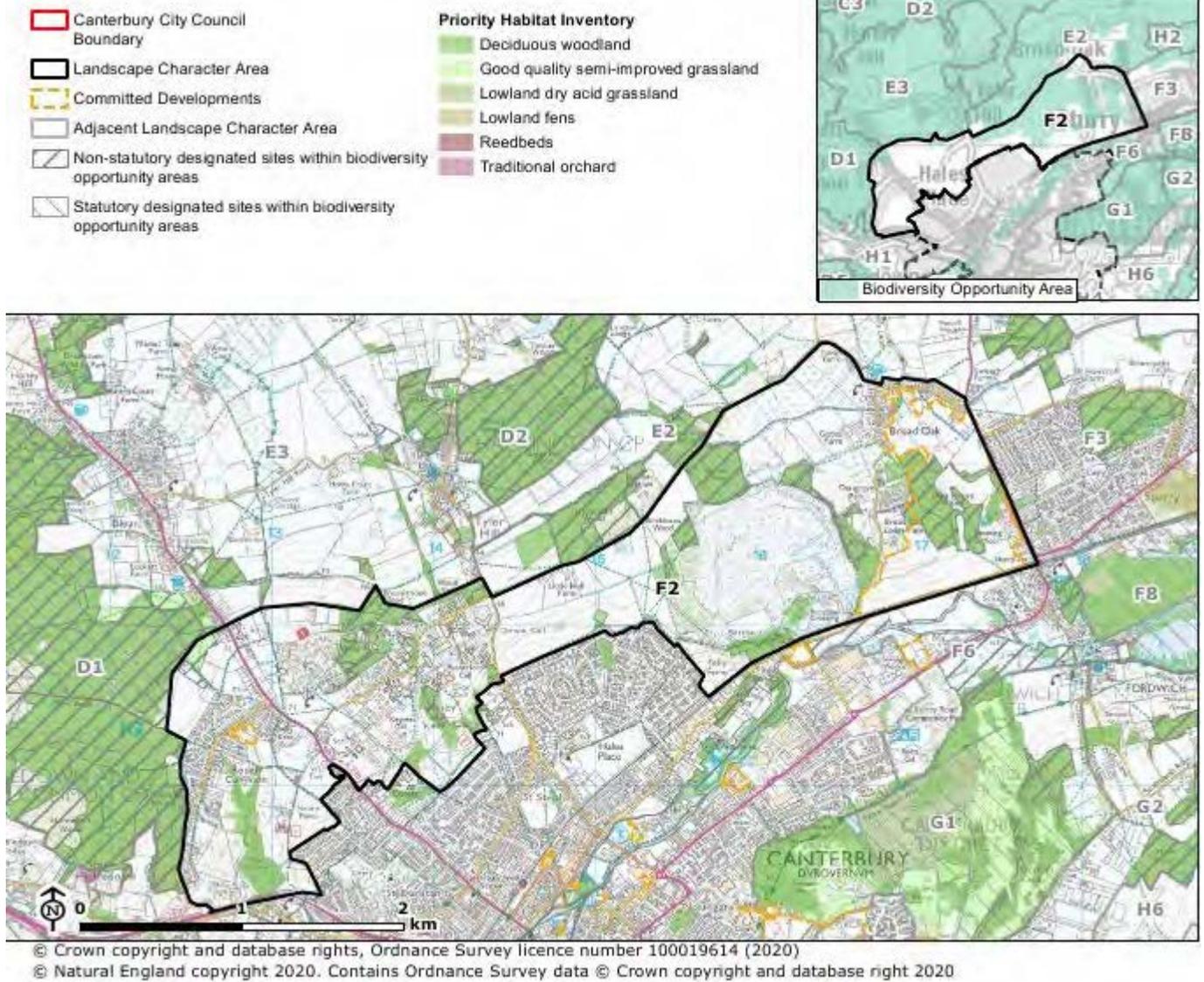
There is a good network of Public Rights of Way (PRoW) throughout the area, which provides connections to the Blean Woods to the north and north-west, as well as between surrounding settlements and Canterbury City.

Evaluation

Key Sensitivities and Values

- Distinctive sloping topography and largely undeveloped ridgeline/skyline which encloses views from, and containment for, Canterbury City – a backdrop in views over a wider area including views across the Stour Valley and the rural ridgeline setting for the Cathedral in long views from the south.
- Long views south over the Stour Valley and Canterbury City to the Kent Downs AONB with the Cathedral as a focal point. Cathedral is seen in a rural valley setting.
- Ecologically valued priority habitat deciduous woodland connected to the Blean Woods.
- Historic field pattern and remnant parkland character at Hales Place provides time depth.
- Scattered farmsteads and small halls designated nationally, and locally as listed buildings and Conservation Areas provide time depth.
- Rural landscape which provides a gap between adjacent small settlements including Rough Common, Tyler Hill, Broad Oak, Sturry and the University of Kent.
- Recreational value through a strong network of PRoW including part of the Crab and Winkle Way link to Whitstable.
- Open parkland of the University of Kent campus.
- Transition to the more rural undeveloped Blean landscape to the north.

Biodiversity Appraisal



Aim: To protect ancient and existing woodland priority habitat and to enhance woodland connectivity as part of the wider woodland network of the Blean BOA.

The east of this LCA lies partially within The Blean BOA, which sets out the following relevant key targets:

- No loss of ancient semi-natural woodland and its mosaic of associated habitats.
- Enhance and reconnect woodland to create a very extensive block of habitat, particularly through the maintenance and restoration of coppice management.
- Restore and enhance heath and acid grassland (including grazed wooded heath) as part of the woodland matrix.

- Create species-rich neutral grassland and to bring it to priority habitat Lowland Meadow quality.

Broad habitat types present within the LCA include arable and horticulture, improved grassland, neutral grassland, broadleaved, mixed, and yew woodland, Inland rock/Quarry and built up areas. Habitats of key importance within the LCA include priority habitat deciduous woodland and good quality semi improved grassland habitat.

Guidance

Landscape Guidelines and Key Habitat Opportunities

Landscape Management

- Protect and conserve ancient woodland and existing woodland priority habitat. This should include strengthening of habitat connectivity by restoring hedgerows and woodland corridors linking to the Blean Woods, and between woodlands around the University and Broad Oak. No further loss or fragmentation of ancient woodland should be permitted.
- Conserve and improve the traditional landscape pattern and structure, as well as increasing biodiversity interest, through the establishment and maintenance of hedgerows along historic field boundaries. Augment fragmented field boundary hedgerows with native species, replacing post and wire fencing where possible.
- Restore and enhance heath and acid grassland. Consider opportunities to create areas of species-rich neutral grassland y, particularly on the slopes overlooking Canterbury City.
- Conserve remnant orchards for their landscape and biodiversity value.
- Conserve and reinforce the parkland character around Hales Place, putting in place a programme of new parkland tree planting where appropriate.

Development Management

- Conserve the local distinctiveness of historic buildings and their rural setting, particularly within the Hothe Court, Harbledown, Tyler Hill and Allcroft Grange Conservation Areas.
- Conserve the rural character of the landscape ensuring that it continues to play a role in the separation of Rough Common and Blean; the University of Kent and Tyler Hill; and Sturry and Canterbury City.
- Conserve and enhance the integration of urban edges, through native wooded boundaries and mature trees to provide visual screening and reduce the impact of built development on the open and exposed landscape.
- Assess new building proposals within and adjacent to the urban area to ensure that an attractive and integrated edge is formed with the adjacent rural and open recreational landscapes. This is important for existing edges as well as proposed new strategic allocation at Sturry/Broad Oak.
- Conserve the role of the area as an essentially undeveloped backdrop and ridgeline in views framing Canterbury Cathedral and avoid unsympathetic land uses on the visually sensitive ridgelines including further tall structures, which would punctuate the skyline or overtop existing buildings.
- Conserve and enhance key views to the city and Cathedral in its valley setting across open fields from the rising valley slopes
- Ensure development at the University and educational establishments respects their open campus parkland character, with generous amenity grassland and appropriate 'parkland' tree planting and recognises the sensitive skyline locations. Seek opportunities to improve the integration of associated playing fields and sports pitches within the local landscape.
- Consider need for a landscape masterplan for the educational establishments in this area to provide a co-ordinated strategy for future development and expansion.
- Avoid extension of development on and beyond the ridgeline into the more rural Blean landscape to the north.

Appendix 2:

Extract from Local Landscape Designations Review and recommendations 2021



The Blean Woods

Chapter 7

The Blean Woods

Candidate LLD name	The Blean Woods		
Summary Information			
Relationship to existing local landscape designation	<p>The Blean Woods was designated as Special Landscape Area (SLA) in the Kent and Medway Structure Plan (2006).</p> <p><i>The Blean Woods AHLV identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands. (Canterbury District Local Plan, 2017)</i></p>		
Extent of area	The LLD covers the woodland and farmland on the clay hills between the city of Canterbury to the south and the coast to the north. The landscape has a unique history and a strong sense of place. It is one of the most extensive complexes of ancient woodland in the south east of England.		
Landscape character context (% coverage by the existing AHLV)	<p>C2: Chestfield Farmland (100%) C3: Court Lees and Millstrood Farmland (49%) C4: Ford and Maypole Farmland (28%) D1: Harbledown (100%) D2: Thornden (100%) D3: Ellenden and Victory (100%) D4: East Blean (100%) D5: Bigbury Hill (99% Canterbury AHLV) D6: Denstead (97%) E2: Sarre Pennn Valley (56%) E3: Amery Court (40%) H1: Harbledown Fruit Belt (8% Blean, 24% Canterbury)</p>		
Evaluation			
Desk review (see table 3.1 and Appendix A)	LCA	Take forward	Notes
	C2	Part	Further survey required to assess relationship with the Blean woodlands, A299 plus large solar farm suggest boundary to be drawn to the south.
	C3	Part	Further survey required to assess relationship to the Blean woodlands. A299 forms defensible boundary and excludes arable farmland rising to the edge of Whitstable.
	C4	Part	Further survey required to assess relationship to the Blean woodlands.
	D1	Y	Fully meets criteria.
	D2	Y	Fully meets criteria.
	D3	Y	Fully meets criteria.
	D4	Y	Fully meets criteria.
	E2	Y	Further survey required to assess relationship with the Blean Woodlands.
	E3	Y	Further survey required to assess relationship with the Blean Woodlands.
H1	N	Not part of Blean, potentially part of Canterbury setting – views.	
Full Evaluation	See overleaf		

Boundary commentary	<p>See Figure 7</p> <p>The woodland is a main feature within this area which should be retained as the Blean Woods LLD.</p> <p>Having assessed the Blean Woods landscape boundary it is concluded that potential amendments to the Blean Woods boundary could be justified to further strengthen the woodland as the main feature of this LLD. The existing boundaries encompass the entirety of the woodland blocks and include areas important to the setting of the woodland. Areas of major development have been excluded.</p> <p>The western boundary is the district boundary and the Blean Woods is a contiguous LLD within Swale Borough.</p> <p>To the north the boundary includes parts of character area C2 which forms the farmland setting to the woods excluding the development around Clapham Hill and Pean Hill. The existing boundary is considered to be appropriate as it follows Fox Cross Road and rights of way. It is proposed that the current boundary is retained, with the following amendments to the boundary to the north:</p> <ol style="list-style-type: none">1. The boundary is recommended to be drawn southwards along the New Thanet Way (A299) which essentially marks the valley floor with slopes ascending to the south and the woodland edge. The area north of the New Thanet Way is of value as the rural setting to Whitstable but is open arable farmland and does not have the same qualities as setting to the Blean Woods.2. The boundary has been drawn to the south of the Thanet Way to exclude the large area of solar farm. <p>To the east the existing boundaries which follow Bullockstone Road and exclude the settlement of Herne Common and continuing to include the farmland south of Herne and along Maypole Road are appropriate, with a minor extension:</p> <ol style="list-style-type: none">3. To incorporate Buckwell Wood.4. The southern boundary is more difficult and has been extended to incorporate Kemberland Wood, and Little Hall Wood on the Sarre Penn valley slopes. <p>Recommendation 5 is put forward as an option for discussion and consideration through the development of the Local Plan and could represent a significant change in the boundary.</p> <ol style="list-style-type: none">5. Three potential options have been put forward for more significant extensions to the existing boundary, with a fourth option to apply an alternative policy approach. The three extension options would be a departure from the existing purpose for designation of the Blean Woods AHLV, which is to recognise the high landscape value of the woodland, which is also designated a Special Area of Conservation and Site of Special Scientific Interest.<ol style="list-style-type: none">i. Extending the LLD to include the predominantly farmland currently excluded between the University and Clowes Wood, to incorporate the Sarre Penn Valley, the Crab and Winkle Way and the distinctive church of St Cosmos and Damian in the Blean on the ancient salt road to the coast. This area includes some more intensive horticultural/orchard land uses and excludes the main settlement of Blean. The area, although not wooded, is strongly associated with 'The Blean' landscape.ii. A southern boundary along the Sarre Penn Valley (footpath): This would also extend the designation significantly south across areas of farmland, terminating along the valley that marks the rise to the Stour Valley slopes and University. It includes medieval field patterns, remains of medieval settlement, Church of St. Cosmos and Damian, and recreational routes (Crab and Winkle). It is a clear line on the ground although would divide the valley which forms a distinctive landscape unit.iii. Drawing the boundary further back along Tyler Hill Road. This would also include a wider area of the distinctive farmland extent of The Blean, with the road forming an identifiable boundary on the ground. It captures a significant area of farmland that is characteristic between the large woodland blocks at Thornden Woods, Clowes Wood and Church Wood. It would exclude features such as the church of St. Cosmos and Damien and medieval earthworks.iv. Instead of extending the LLD, this recommendation could instead be addressed by a relevant Site or Development Management policy to ensure that any development proposals in this area have regard for the special characteristics and sensitivities of the area.
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Recommendations	<ul style="list-style-type: none">■ The woodland is the main feature within the area. Retain the existing AHLV as an LLD, with boundary modifications as noted above (1-4).■ The approach to the area of land to the south of the Blean Woods LLD should be considered through the development of the Local Plan (note 5 above). It is recognised that any extension would be a departure from the previous designation, and although there is potential
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to extend the LLD into this area, the landscape qualities of the area could alternatively be addressed through Local Plan policies that require the design and form of any new development to recognise the special characteristics and sensitivities of the Blean Woods LLD.

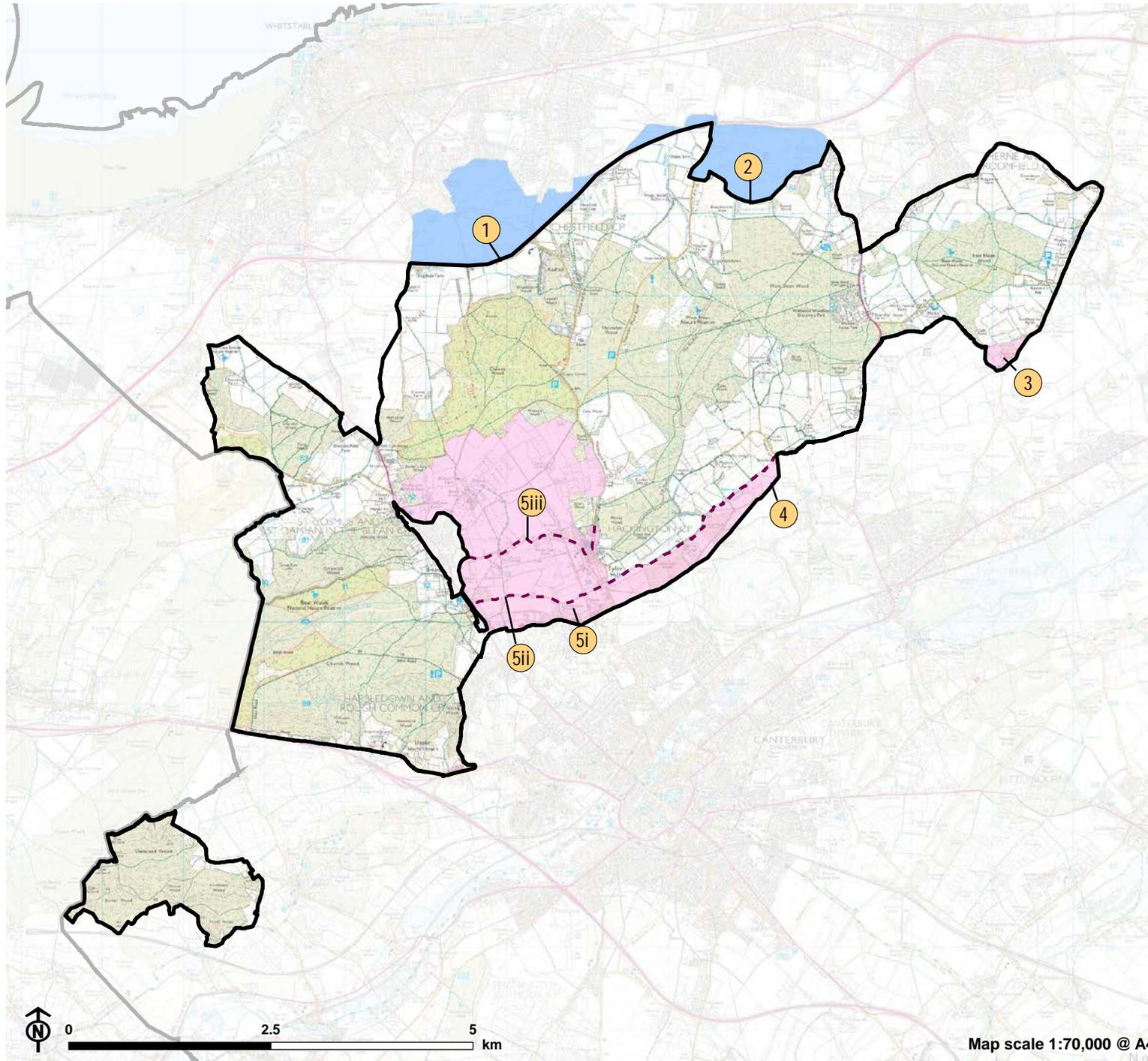
- A similar policy approach could be followed for the areas abutting the coastal settlements to the north which are part of the visual/agricultural setting of The Blean, although now not within the LLD boundary.
- The LLD recognises the special and outstanding natural, historic and cultural landscape and strong sense of place of this unique area. Continuing integrated management by the various landowners as promoted through The Blean Initiative is required.

Full Evaluation – The Blean Woods

<p>Local distinctiveness and sense of place</p>	<p>A strong sense of place created by large and continuous belts of deciduous woodland on elevated ground. The Blean forms a prominent wooded ridge between Canterbury and the coast. It is a highly distinctive and unique landscape within the district forming a discrete recognisable area, with its pattern of woodland blocks, areas of heathland and acid grassland. North-south former drove routes cross the ridge between Canterbury City and coast, and evidence of history linked to the medieval period reflecting past ownership and management by Canterbury Cathedral.</p> <p>The Blean sense of place extends across the ridge including adjacent and intervening agricultural land and is not limited to the areas within woodland. It also includes areas of agricultural land, such as around Amery Court which were opened up as clearings in the forest in the medieval period. This central agricultural area is recommended for consideration for inclusion within the LLD, despite intensive agricultural/horticultural land use in parts. It includes medieval field patterns, remains of medieval settlement, Church of St. Cosmus and Damian, and recreational routes (Crab and Winkle Way). The valley of the Sarre Penn and including the adjacent small woodland blocks on the valley slopes are a logical extension to the LLD.</p>
<p>Landscape quality</p>	<p>Strong ecological integrity represented by the continuous and intact blocks of ancient woodland and extensive designation at local, national and European level. The majority of The Blean is being actively managed by Conservation organisations including The Wildlife Trust, Woodland Trust and RSPB as well as active productive management for timber by Forestry England.</p> <p>Much of the woodland is within traditional coppice with standards, with areas of commercial forestry at Clowes Wood and Thornden Wood. The entire area is considered to have a high landscape quality.</p> <p>The intervening agricultural areas on the edges of woodland include a mix of modern arable fields and areas of fruit production and are characterised by their strong wooded backdrop and retain a Blean character and sense of place.</p> <p>There is an absence of detracting elements throughout, although a number of solar farms have been developed adjacent to the woodlands and a pylon line is prominent ascending the slopes at Clowes Wood. Wealdon Forest Park is a small commercial area cut into the woodland at Canterbury Road.</p> <p>The extended modern linear settlements at Blean and Tyler Hill are excluded from the designation, while to the north the A299, in a minor valley, generally marks clear boundary with the agricultural land beyond extending to the edge of the coastal settlements.</p>
<p>Scenic qualities and perceptual aspects</p>	<p>A strong sense of tranquillity and relative insularity created by the continuous expanses of woodland as part of one of the most extensive semi-natural woodland complexes in south east England. The pattern of woodland and open farmland, contained by a wooded backdrop, creates a strong visual character.</p> <p>The majority of The Blean is entirely undeveloped forming extensive tracts of land only accessible on foot offering a rare experience of remoteness and isolation and experience of dark skies at night. There is a general absence of incongruous/detracting features.</p> <p>Bigbury is included as part of The Blean landscape type but by virtue of its views out over Canterbury and the Cathedral is recommended for inclusion within the Canterbury City LLD.</p>
<p>Natural and cultural qualities</p>	<p>The continuity in woodland cover has resulted in a rich habitat. Almost all of the woodland is classified as ancient origin, with clearings and rides containing heathland and acid grassland habitats. Value for wildlife is recognised at a national level and European level with over half of The Blean being designated a SSSI and approximately one third as a SAC (East Blean Wood, Ellenden Wood and Blean woods NNR).</p> <p>The matrix of woodland grassland and heathland habitat supports the rare heath fritillary butterfly and diverse and rare woodland birds including nightingales and nightjar.</p> <p>The landscape provides a living record of past woodland management practices. Much of the land was endowed to the Abbey of St Augustine and the Cathedral, with rights of pannage for pigs and herbage for cattle. Archaeological features present within the ancient woodland include bronze age barrows, sites of tile kilns and claypits. Medieval woodbanks mark boundaries of woods belonging to different religious houses in Canterbury, with associated areas of coppice and pollards. The Radfall is a distinctive example of a linear earthbank marking a former droveway for herding cattle and pigs, while the entrances to the Blean marked by 'gates' as at Radfallgate.</p>

Recreation value	The Blean as a whole provides a highly valued recreational resource between the coastal towns and Canterbury, offering extensive promoted routes along connected PRow. Areas owned by the Wildlife Trust, Forestry England and RSPB provide car parking facilities and a network of linked trails for cycling, riding and walking.
Associations	A historic landscape with strong associations with the medieval period of management, which can still be read in the landscape today.

Figure 7: The Blean Woods Local Landscape Designation



Canterbury City Council boundary

Local Landscape Designation

The Blean Woods

Proposed Changes

Addition
Removal

Proposed Boundary Changes

- 1 Boundary drawn southwards along New Thanet Way (A299) which essentially marks the valley floor.
- 2 Excludes the large area of solar farm.
- 3 Incorporates Buckwell Wood.
- 4 Extend to encompass Kemberland Wood, and Little Hall Wood on the Sarre Penn valley slopes.
- 5 5i) Extend the LLD to include land between the University and Clowes Wood, incorporating the Sarre Penn Valley, the Crab and Winkle Way and the distinctive church of St Cosmos and St Damian in the Blean, on the ancient salt road to the coast.

5ii) A southern boundary along the Sarre Penn Valley (footpath)

5iii) Drawing the boundary further back along Tyler Hill Road

5iv) Instead of extending the LLD, this recommendation could instead be addressed by a relevant Site or Development Management policy to ensure that any development proposals in this area have regard for the special characteristics and sensitivities of the area.

Map scale 1:70,000 @ A4

Appendix 5 – Plan Showing the Existing Green Gap and Concept Masterplan



Contractors and consultants are not to scale dimensions from this drawing

Extent of site



Extent of Existing Green Gap (7.28ha)



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Client
Hallam Land

Project
**Land west of Whitstable Road
Canterbury**

Description
**Existing
Green Gap with
Proposed Concept Masterplan**

Status
Preliminary

Scale	Drawn By	Date
1:1250@A1	VG	Oct 06
Job Number	Drawing Number	Revision
35740	104	P7

Appendix 6 – Plan Showing the Green Gap Areas Within the Site and Concept Masterplan



Contractors and consultants are not to scale dimensions from this drawing

Extent of site 

Existing Green Gap within site enhanced (1.19ha) 

Existing Green Gap within the site for highway access and car parking (0.11ha) 

New Green Gap within site added (0.54ha) 



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Client
Hallam Land
Project
**Land west of Whitstable Road
Canterbury**
Description
**Extent of Site
Showing Green Gap Land Areas**

Status		
Preliminary		
Scale	Drawn By	Date
1:1250@A1	VG	Oct 06
Job Number	Drawing Number	Revision
35740	103	P7

Appendix 7 – Plan Showing the Proposed Green Gap and Concept Masterplan

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Extent of site



Extent of Proposed Green Gap (7.79ha)



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Client
Hallam Land
Project
**Land west of Whitstable Road
Canterbury**
Description
**Proposed
Green Gap with
Proposed Concept Masterplan**

Status	
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Date	
Oct 06	
Job Number	Drawing Number
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Revision	
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