

Representations to the Canterbury Local Plan Review (Preferred Options Consultation, July 2021)

Land at Bodkin Farm, Whitstable

On behalf of Parker Strategic Land

August 2021

Turley

Contents

1.	Introduction	3
2.	The Site, Surroundings and Proposals	4
3.	Written Representations regarding the Preferred Options	7
4.	Summary	15

Appendix 1: Location Plan

Appendix 2: Landscape and Visual Note

Appendix 3: Updated Transport Appraisal

Appendix 4: Flood Risk & Drainage Technical Note

Contact
David Murray-Cox



July 2021

1. Introduction

- 1.1 These representations have been prepared on behalf of our client Parker Strategic Land in response to the Canterbury District Local Plan Preferred Options Consultation.
- 1.2 Canterbury City Council initiated a Local Plan Review and is now in the early stages of preparing the new Local Plan with the current consultation being on Preferred Options.
- 1.3 Parker Strategic Land are promoting land at Bodkin Farm which is located to the south east of Whitstable, adjoining Chestfield, south of Thanet Way. It is formed of five agricultural fields and currently in use as arable farmland. Bodkin Farmhouse and associated land and buildings is located to the western boundary of the site. The Farmhouse was previously Grade II Listed, but was 'delisted' after a damaging fire. A site location plan is enclosed at **Appendix 1**.
- 1.4 Parker Strategic Land reserves the opportunity to provide more detailed representations as and when the draft policies and evidence emerge.
- 1.5 The remainder of these representations are set out as follows:
 - Chapter 2 seeks to introduce the site and surroundings and summarises the nature of the opportunity at Bodkin Farm;
 - Chapter 3 sets out our commentary in relation to the draft vision and preferred options;
 - Chapter 4 sets out a summary of representations.
- 1.6 These representations are supported by:
 - A Landscape and Visual Note (**Appendix 2**) produced by Barton Willmore;
 - An Updated Transport Appraisal (**Appendix 3**) produced by RPS; and
 - A Flood Risk & Drainage Technical Note (**Appendix 4**) produced by BWB.

2. The Site, Surroundings and Proposals

- 2.1 This section provides context into the land at Bodkin Farm, Chestfield, Whitstable (hereafter referred to as 'the site') which our client has interests in.

The Site

- 2.2 The site extends to approximately 24 ha and currently comprises Bodkin Farm and associated agricultural fields to the east. The site is directly adjacent to the existing defined boundary to Whitstable Urban Area (as defined by the existing Policies Map) and constitutes a strategic option for the expansion of the town.
- 2.3 The farm itself constitutes a farmhouse and several modern farm buildings. Bodkin Farmhouse was previously a Grade II Listed Building; however, the property suffered a damaging fire and as a result has been delisted and is in a very poor condition.
- 2.4 There are no other designated heritage assets within the site. The Chestfield Conservation Area boundary is approximately 430m to the west of the site, located to the south of Maydowns Road.
- 2.5 The A2990 (Thanet Way) runs along the northern boundary of the site, existing residential development is located along the southern boundary, with agricultural fields to the western boundary and a solar farm and Purchas Wood running along the eastern boundary.
- 2.6 The vast majority of the site lies within Flood Zone 1 however the westerly area surrounding the farmhouse lies within Flood Zones 2 and 3.
- 2.7 The site falls within the Zones of Influence of the Thanet Coast and Sandwich Bay Special Protection Area (SPA), and the Swale SPA and Ramsar Site. It is also located within the Herne Bay and Whitstable Green Gap as defined by current adopted Local Plan policy.
- 2.8 Parker Strategic Land are sole owners of the site and there are no restrictions which would prevent early delivery of the site in the Plan period to meet needs.

Surrounding Area

- 2.9 Adjacent to the northern boundary is the A2990 with a solar farm located to the east. A PROW is located along the southern boundary of site providing access on foot into an existing residential development located south west of the site boundary. An existing watercourse runs along the western boundary.
- 2.10 The site offers good access to a number of local services and amenities due to its location between Swalecliffe, Herne Bay, Chestfield, and the centre of Whitstable, all of which offer a range of local services, making the site a highly sustainable location for development.

- 2.11 The nearest train station is Chestfield & Swalecliffe located less than a mile from the site, offering transport links into London (Victoria & St Pancras) and Ramsgate. The nearest bus stop is situated on St. John's Road B2205 which is approximately 850m from the site (Swalecliffe, Goodwin Avenue). This bus stop is served by seven services namely route 4, 903, 904, 905, 906, 922 and Triangle operated by Stagecoach.
- 2.12 For plan-making purposes, Chestfield is treated as part of Whitstable. Alongside Canterbury and Herne Bay, Whitstable is identified as an urban area under the current Local Plan. This recognises the sustainability of the settlement and its role in the District as a whole. Under the current Local Plan the urban areas of the District were to continue to be the principal focus for development.

Site History

- 2.13 The site was assessed in the Council's most recent Strategic Housing Land Availability Assessment (SHLAA, 2013) under site reference SHLAA/178. At this time the Bodkin Farm buildings were excluded from the site. The site was not rejected at Stage 1 and proceeded to the Stage 2 technical assessment. A series of technical considerations were identified as part of this assessment.
- 2.14 The most relevant planning history for the site relates to the proposals for a mixed-use development of up to 290 dwellings, primary school and other supporting facilities, which was promoted by another party and predates our client's involvement in the site. The proposals were considered under application reference CA/14/01319/OUT and included additional land to the west of the parcel now being promoted by Parker Strategic Land. The application was refused by notice dated 13th November 2014 for eight reasons. The decision was subsequently appealed under reference APP/J2210/A/14/2227624. By the time of the planning inquiry only one reason for refusal remained being:

"The effect that the proposal would have upon the character and appearance of the area, having regard to its location within a designated Green Gap."

- 2.15 It is clear therefore that there were no technical matters which had not been overcome to the satisfaction of the Council. From a review of the appeal decision it is clear that the appeal hinged on the impact on the listed building and development in the Green Gap. Clearly following the delisting of the farmhouse the former is no longer of relevance to the consideration of the principle of development of the site. Whilst the Inspector ultimately dismissed the appeal, clearly this was in the context of a Section 78 appeal rather than a Local Plan Review where the Green Gap designation should be a feature of the review.

Proposals

- 2.16 As has been clearly demonstrated through the above Section and the previous appeal decision the site is technically capable of being delivered. Whilst the site is currently located within the Whitstable – Herne Bay Green Gap, as will be set out in Section Three of this Statement, the principle of the Gap and the detailed boundaries of it should be reviewed through the current Local Plan Review process. It is of course

worth noting that the current Local Plan Policy OS6 explains that development will be permitted within Gaps where it does not:

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

2.17 Parker Strategic Land maintains that the land at Bodkin Farm and the associated land can accommodate development without resulting in the two issues set out above.

2.18 Taking into account the above, there are site wide considerations that can be addressed through informed and detailed master planning. We have deliberately not presented a Masterplan at this stage because our client would like to work with the Council to develop a comprehensive scheme that compliments the character and vitality of the area.

2.19 Parker Strategic Land's representations include the following material to support the concept of development on the land referred to in these representations

- A Landscape and Visual Note (**Appendix 2**) produced by Barton Willmore;
- An Updated Transport Appraisal (**Appendix 3**) produced by RPS; and
- A Flood Risk & Drainage Technical Note (**Appendix 4**) produced by BWB.

3. Written Representations regarding the Preferred Options

- 3.1 This section sets out our written representations in response to the Council's Preferred Options Consultation as published on the Council's website.

Section One: Draft Vision and Growth Options

The Draft Vision for the District

- 3.2 Our client broadly agrees with the draft vision for the District. It will be important that the vision has clearly informed the objectives and planning policies to ensure it is achieved and delivered.
- 3.3 Whilst the overarching Vision is broadly agreed with, it is considered that growth should be distributed to a variety of sustainable locations and settlements in the District to support the vitality, viability and meet needs of those settlements. Whilst Canterbury is clearly one such sustainable settlement where growth should be directed, this should not be the sole focus of growth. This approach is likely to provide greater flexibility to ensure that housing needs are met and sustainable development is delivered as will be discussed later in these representations.
- 3.4 In relation to the sub-heading 'improved connectivity' Parker Strategic Land supports the Vision for a range of homes to be provided to meet the needs of the District to improve affordability and support growth. As identified in the Housing Needs Assessment (May 2021) there are a range of needs which the Plan will need to meet to ensure the Vision supports all elements of the community and these needs will vary across the areas of the District. This further emphasises the need for the allocation of a variety of scales of sites in a number of locations across the District.

The Draft Strategic Objectives

- 3.5 The consultation document proposes twelve Strategic Objectives which seek to build upon the overarching Vision for the District. The Strategic Objectives are necessarily broad in nature and cover a wide variety of topics which will feed into the more detailed policy requirements. Parker Strategic Land are supportive of the Strategic Objectives which have a clear relationship to the Vision.
- 3.6 In particular Parker Strategic Land supports the objectives to provide high quality affordable housing for everyone as part of mixed, sustainable communities and for this to be provided with access to community facilities and open space. Given the often more expensive infrastructure requirements required to support very large strategic sites (such as those on which the current Local Plan strategy is highly focused) and the associated longer lead in times, a portfolio of sites will be necessary in order to meet these objectives and to ensure delivery at an early part of the Plan period to meet the identified needs.

Growth Options

- 3.7 The Council suggest that as part of the preferred approach, an additional 14,000 – 17,000 homes will be delivered by 2040, along with the provision of the A28 and

improvements to public spaces. The current adopted Local Plan target would deliver an average of 800 dwellings per annum, which falls below the Standard Method figure for Canterbury which is 1,120 dpa (over the period 2020-2040).

- 3.8 We understand that the 14,000-17,000 homes would be additional to those currently being planned for under the adopted Local Plan. We support this approach, which seeks to take advantage of the economic potential of the District and help towards meeting the need for affordable housing.
- 3.9 The delivery of 17,000 homes in the period up to 2040 would equate to approximately 895 dpa (if the existing supply was discounted) which is significantly less than the current Standard Method figure for Canterbury which is a minimum of 1,120 homes per year (over the period 2020-2040). The figure of 1,120 dpa equates to approximately 22,400 homes in the period up to 2040 which is a significantly higher output than the proposed figure of 17,000.
- 3.10 Several of the options refer to the Local Plan providing an additional 9,000 homes. On the basis that the current standard method results in a requirement for a minimum 1,120 dwellings per annum, and given that the current Local Plan period extends to 2031, and the review period extends to 2040, that results in a minimum additional requirement over 9 years of 10,080 dwellings. Clearly those options which are based on lower growth expectations would not achieve the current standard method requirements.
- 3.11 At this stage, the precise Plan-period is unknown (although it is currently expected to extend until 2040). The Edge Analytics 'Canterbury Housing Needs Assessment' (May 2021) suggests that the Plan will cover the period 2020 – 2040 and should that be the case, the standard method results in a minimum requirement of 22,400 dwellings.
- 3.12 At this stage, the Council has not published any data to demonstrate an up-to-date assessment as to how existing commitments will deliver during the remaining part of the current Plan-period (or within the first 11 years of the proposed Plan-period). However our interpretation is that Policy SP2 of the adopted Local Plan seeks 900 dwellings per annum over the period 2016 – 2031. That suggests that over the first 11 years of the proposed Plan-period, Policy SP2 seeks 9,900 dwellings. Deducting that from the minimum requirement of the standard method over the Plan-period 2020 – 2040, means that the emerging Plan should, as a minimum, plan for an additional 12,500 dwellings (just to achieve the minimum requirements of the standard method.
- 3.13 Whilst we will comment on the levels of growth required in the future, including in relation to the contribution from existing commitments, it appears clear that the LPA's options for lower levels of growth should not be pursued further for the reasons set out above.
- 3.14 We note that if the Council intends to deliver a large proportion of housing through large strategic sites, the associated lead-in times and delivery rates will need to have regard to the need for significant infrastructure improvements. It is currently unclear how the Council intends to deliver these levels of growth and as such we will comment on this matter in subsequent stages of the Local Plan's production.

- 3.15 There is a suggestion that there will be *'more limited development at coastal towns and villages'*. We support growth at other locations outside of Canterbury that will help to maintain the areas vitality, viability, to provide new facilities whilst supporting the needs of those communities. Our client supports an approach which does not rely strictly on one location in the housing market.
- 3.16 Whilst we do not offer any comment on a particular growth location, it is clear that the suggested rural focus would be unlikely to lead to development which is sustainably located, and would not be delivering sustainable patterns of growth as per NPPF paragraph 11a which states *"all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area."*
- 3.17 As noted in Section Two, for plan-making purposes, Chestfield is treated as part of Whitstable. Alongside Canterbury and Herne Bay, Whitstable is identified as an urban area under the current Local Plan. This recognises the sustainability of the settlement and its role in the District as a whole. Under the current Local Plan the urban areas of the District were to continue to be the principal focus for development. Growth should continue to be directed towards these sustainable locations in the District.
- 3.18 With regards to the suggestion of a new freestanding settlement, our concern with this is that it would rely heavily on the delivery of growth in one location. In the event that development stalls or does not happen, this would severely impact Canterbury City Council's level of supply.
- 3.19 Whilst we do not necessarily comment on any option in particular, our client would suggest that the Council should look to deliver the levels of growth required and that this growth is delivered through supporting sustainable settlements. We also suggest that levels of growth are not reliant on one option or a small number of options and that development is dispersed throughout the District creating maximum stability for the delivery of housing. Such a dispersed approach will also have benefits in ensuring market absorption issues do not arise as well as ensuring identified needs are met close to where they arise.

Section Two: Town Centre Strategies

Whitstable Issues and Opportunities

- 3.20 Parker Strategic Land note the Council's acknowledgement that Whitstable's *'distinctive character and ambience has led to a strong tourist industry.'* In order to maintain and enhance the vitality and strength of the centre of Whitstable we suggest that the town forms an aspect of the Council's approach to the distribution of growth. It is important that in order to support the tourist industry there are sufficient homes in the right place in order for the needs of the tourist industry to be met. As such it will be important for Whitstable to be allocated an appropriate level of growth to support these wider aspirations.

Section Three: Housing and New Communities

Meeting Housing Needs

Making sure the right types and tenures of housing are provided

- 3.21 We support the Council's acknowledgment that meeting the needs of the community means offering a range of different properties allowing for flexibility. In particular the Council's Housing Needs Assessment ('HNA') (May 2021) identifies significant growth in the older age population (65+) and acknowledges that this will have *'important implications for the provision of housing over the plan period.'* The report states that *"The provision of alternative accommodation for the older age-groups (1-2 bedroom homes, bungalows, apartments) could provide a solution that both meets a need for continued owner-occupation and/or rental, post-retirement, whilst freeing up larger properties for younger age cohorts over the plan period. This could also help to alleviate overcrowding, which is highest in Canterbury City."*
- 3.22 At this stage we do not necessarily support any particular options, however we do support the provision of a range of sites in sustainable locations across the District in order to deliver and identified need for housing. It is considered that this of particular importance in planning for the needs of the older age population who may have long standing ties to parts of the District which they wish to maintain.

Providing opportunities for small and medium sized housing developments

- 3.23 As acknowledged by the Council, the current Local Plan strategy is very focused on large strategic sites, generally with over 800 homes. Such sites can result in longer lead-in times due to the need to provide significant infrastructure in order to deliver them. Whilst the Issues identified relates to the need for small and medium sized sites of less than 1 hectare, it is considered important that the Council broaden its portfolio of sites rather than the seemingly polarised approach of 10% of sites being of less than 1ha and the remainder of over 800 homes. Clearly there is a significant divergence between these two scales of sites and it is important that the Council also consider the merits of allocating sites between these scales which will have the benefits of providing supporting onsite infrastructure and affordable housing but without the need for the delivery of significant infrastructure as experienced by sites of over 800 homes.

Providing opportunities for suitable brownfield and regeneration developments

- 3.24 Parker Strategic Land contends that it is unrealistic to assume that brownfield and regeneration schemes deliver a significant amount of growth, and we would support the view that this should be flexible. Indeed it is noted that the Council's published brownfield land register (2020) only identifies sites with a potential capacity for 1,375 dwellings. Furthermore it is noted that a number of these sites benefit from planning permission but have seemingly not delivered, reflecting the complexity of bringing forward such sites and the delays often experienced in doing so.

Making sure the right densities are delivered in developments across the District

- 3.25 We support the Council acknowledging that it is not necessarily the case that one density will be appropriate across the entire district, and new developments will need to respect the character, landscape and historic nature of the area.

- 3.26 Whilst we support that it is important to incorporate good design, we suggest that setting specific densities for areas may limit the delivery of developments that would otherwise be viable in these locations. It is clear that individual site circumstances can significantly influence the appropriateness of densities and it is not anticipated that any assessment at the Local Plan level would be fine-grained enough to take account of such circumstances.

Making sure housing is provided for rural communities

- 3.27 We support the Council's acknowledgment that new housing developments at rural communities can provide homes for local people including affordable housing that can contribute to sustaining local services and facilities.

Community Infrastructure and Design

Supporting sustainable living in new communities

- 3.28 We support the delivery of new communities that offer a mix of homes, accessible jobs, facilities like schools, healthcare and shops, and a clean, safe environment. As identified in the consultation document it is important that the emerging policies reflect that a broader scale of development types are likely to be allocated than the existing Local Plan strategy. It is considered the policy should reflect that smaller developments should also make provision towards social and community infrastructure either through onsite provision or financial contributions towards offsite facilities.
- 3.29 Whilst the preferred policy option HNC6C suggests that proposals of 50 or more homes would need to show that key services, such as primary schools and shops, can be accessed within 15 minutes walking or cycling times, it is assumed that this would only relate to windfall developments. Whether sites are suitable for allocation for development based on their relationship to key services should be assessed through the Local Plan process within any necessary identified improvements, such as enhanced pedestrian or cycle links, forming part of the site's allocation. It should therefore not be necessary for the proposed allocations to demonstrate at the application stage that they meet this criteria.

Making sure all design is high quality

- 3.30 Parker Strategic Land supports the delivery of high quality design for new developments that respond positively to the local character and context which is consistent with national policy. It is considered the preferred policy option HNC7C suggests a pragmatic approach reflective of the different scales of development likely to be delivered over the Plan period. It will be important to ensure that any additional processes required for the delivery of key strategic development sites which would add to the timescales for such sites being brought forward are reflected in the Council's housing trajectory to ensure delivery of supply across the Plan period and maintenance of a five year housing land supply.

Delivering low carbon and energy efficient housing

- 3.31 Parker Strategic Land support the delivery of low carbon and energy efficient housing in principle. The nature of any requirements will need to be tested alongside the overall Local Plan requirements through a viability appraisal to ensure the proposed allocations are deliverable. We reserve the right to comment on this matter further as more evidence is published.

Improving water efficiency

- 3.32 Parker Strategic Land recognise the importance of new developments seeking to improve water efficiency. The nature of any requirements will need to be tested alongside the overall Local Plan requirements through a viability appraisal to ensure the proposed allocations are deliverable. We reserve the right to comment on this matter further as more evidence is published.

Incorporating renewable energy within developments

- 3.33 Parker Strategic Land acknowledge the Council's position that there is a need to reduce energy demand within new and existing commercial and housing developments through energy efficiency measures. The nature of any requirements will need to be tested alongside the overall Local Plan requirements through a viability appraisal to ensure the proposed allocations are deliverable. We reserve the right to comment on this matter further as more evidence is published.

Specialist Housing Needs

- 3.34 Parker Strategic Land supports the Council identifying a need for a range of tenures including affordable housing, families with children, older people, (from independent living or care homes), and first time buyers.
- 3.35 Our client reserves the right to comment on the percentage of affordable homes that will be required from new development sites when this is considered at the next stage of the Local Plan review process. The proposed affordable housing requirement must both take account of the local needs for such housing but also the viability of developments in ensuring the allocations are deliverable having taken account of all other requirements of the Local Plan.

Providing Housing for Older People

- 3.36 Whilst we do not provide comments on one particular option for the delivery of housing for older people, we consider that given the figures in the HNA suggesting a growth in the number of older people, provision of accommodation for this age bracket should play a role in the content of the emerging plan.
- 3.37 Given the scale of need we suggest there should be a range of approaches, including a permissive policy to allow such developments to come forward in sustainable locations where it meets an identified need.

Section Seven: Historic and natural environment

Protecting and enhancing biodiversity and green and blue infrastructure (parks, rivers and other spaces)

How should we protect and enhance biodiversity and green and blue infrastructure?

- 3.38 We recognise the importance of biodiversity and green and blue infrastructure and support the aspiration to protect and enhance these assets. At this stage the evidence has not been published to allow us to comment fully on whether the Council's proposed approach to requiring a 20% biodiversity net gain is justified and deliverable when considering the overall Local Plan requirements. We therefore reserve the right to comment further on this at a later stage of plan making.

Protecting and enhancing the character of our valued landscapes

Making sure our approach to green gaps is still effective

3.39 We note the Council has undertaken a 'Green Gaps and Local Green Spaces Review' (2021). In our view, this is not a substantial review of the capacity of the Gaps to accommodate development and it should not be assumed that because a Gap was previously identified, it should be retained, or retained in its current form, or could not accommodate development.

3.40 It is of course worth noting that the current Local Plan Policy OS6 explains that development will be permitted within Gaps where it does not:

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

3.41 Parker Strategic Land maintains that the land at Bodkin Farm and the associated land can accommodate development without resulting in the two issues set out above.

3.42 Without commenting on any specific option, Parker Strategic Land considers that the Council should undertake a thorough review of the Green Gaps to ensure that they are fully assessed as to their role and function, as well as the role they could play in accommodating sustainable development. Any such review should be sufficiently fine-grained to consider separate parcels within any individual Green Gap, and not just look at each existing Green Gap as a single homogenous entity.

3.43 This Statement is accompanied by a Landscape and Visual Note (**Appendix 2**) by Barton Willmore which supports this view. The Note concludes:

“With regard to Policy OS6 Green Gaps, and Policy OS7 Herne Bay and Whitstable Green Gap, the Site adjoins the existing western settlement edge of Whitstable, set between Thanet Way to the north and residential properties along Maydowns Road to the south, with the residential areas of Whitstable, that is Chestfield and Swalecliffe, to the south-west and to the north-west, of the Site respectively, and is therefore in an area already influenced by existing development, and Thanet Way. The Site is well-contained on the eastern boundary by vegetation on the Site boundary, and by Purchas Wood Ancient Woodland, which is protected, to the immediate east of the Site. The Site is separated from the Green Gap to the east of the Site by the Molehill Solar Farm. As noted, the Green Gap to the east of Molehill Solar Farm comprises land that is generally flat, with more open views across the landscape to the south, as illustrated by Site Context Photographs 7, 8 and 9, the locations of which are also shown on Figure 2: Site Context Plan, and which provides a tangible green gap, with views of the intervening landscape, between Whitstable and Herne Bay. The Green Gaps and Local Open Space Review does not provide any justification for the specific boundary alignment or extent of the Green Gap for the Green Gap between Whitstable and Herne Bay to substantiate the finding that the Green Gap should be retained as existing. However, considering the existing landscape and visual context of the Site, the Site could be removed from the Green Gap, with sufficient extent of intervening landscape,

to the east of the Site, remaining to provide a green buffer, effectively functioning as a Green Gap between Whitstable and Herne Bay.

If the Site were to remain within the Green Gap, whilst residential development on the Site would extend into the Herne Bay and Whitstable Green Gap, as defined in Policy OS6, it would not “significantly affect the open character of the Gap”, with the most open part of the Gap between Whitstable and Herne Bay being maintained, as illustrated by Site Context Photographs 7, 8 and 9. Furthermore, residential development on the Site would not “lead to coalescence between existing settlements”. Nor would residential development on the Site “result in new isolated and obtrusive development in the Green Gap”.

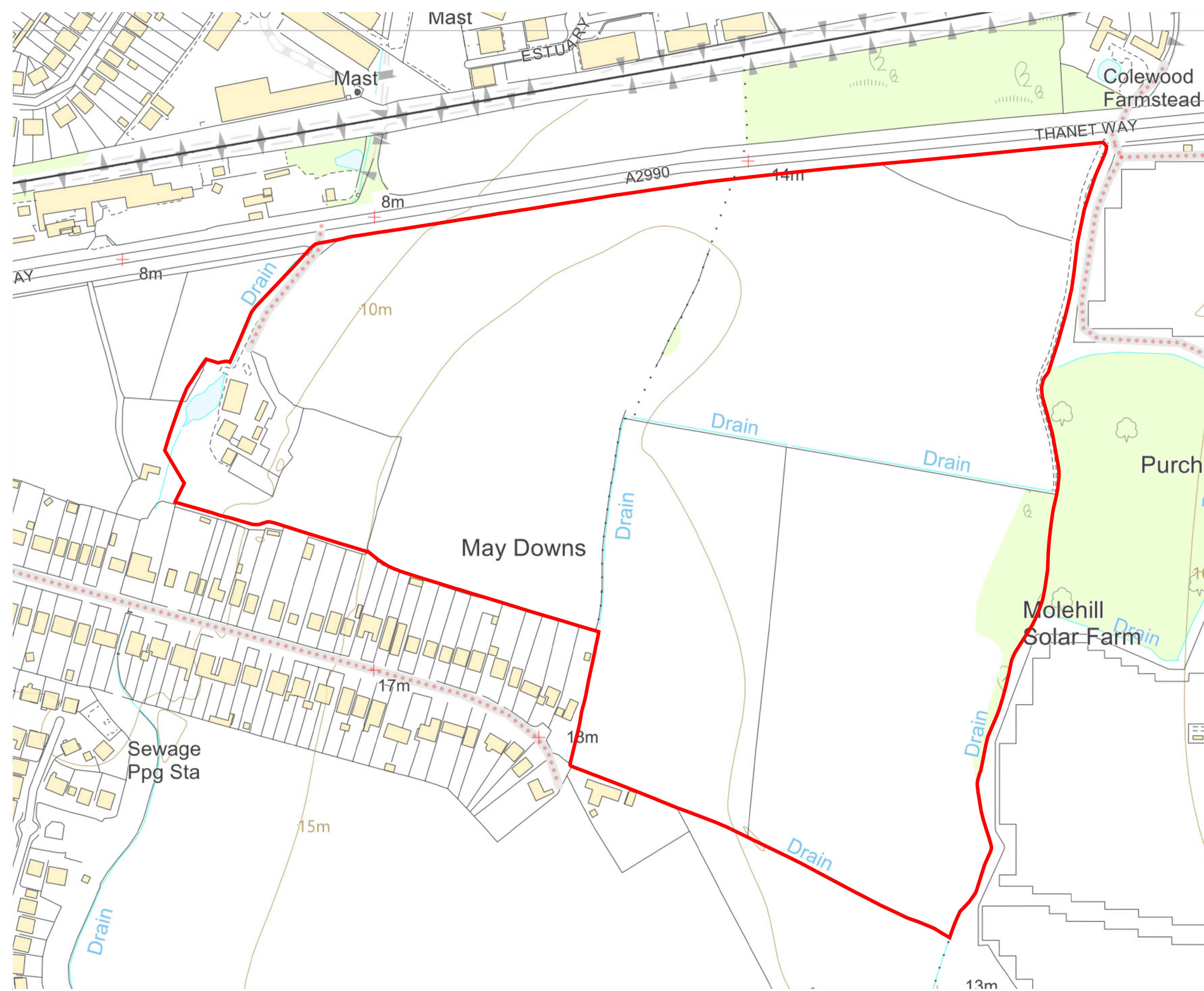
Section Eight: Sustainability Appraisal

- 3.44 We note that the Council have undertaken a Sustainability Appraisal, however the components of each option are still undefined and therefore we reserve the opportunity to comment on this further along in the process.

4. Summary

- 4.1 These representations have been prepared by Turley on behalf of Parker Strategic Land in support of residential development at Land at Bodkin Farm, Whitstable.
- 4.2 As set out in this report, it has been demonstrated that the site is in a sustainable location that offers good transport links and access to local amenities and services.
- 4.3 The site is not subject to any constraints that would prevent development from being delivered and any side wide considerations can be overcome in order to deliver a viable scheme on the site.
- 4.4 Whilst much of the commentary provided in these representations are broader comments, we reserve the opportunity to comment on such matters in more detail at a later date following more detailed information being received from the Council.

Appendix 1: Location Plan



Note:
 This drawing is for information purposes only and not for use in construction.
 Do NOT scale from this drawing.
 All dimensions are to be checked on site and any discrepancies should be immediately reported to the originator of the drawing.
 All information is copyright protected and may not be used or reproduced without prior permission.

© Crown copyright 2021 OS 100019980. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.

Title
 Whitstable, Bodkin farm

Location Plan

Date
 08/07/2021

Scale
 1:1250@A1 / 1:2500@A3

Drawn	Designed	Approved	Reference	Revision
CP	CP	CP	WNF01/006	--



Parker Strategic Land
 38,5 North Lane, Foxton, LE16 7RF
 T:0116 2899555 E:hello@parkerstrategic.co.uk
 www.parkerstrategic.co.uk

Appendix 2: Landscape and Visual Note

Bodkin Farm, Whitstable: Landscape and Visual Note

Prepared on behalf of Parker Strategic Land

August 2021

Bodkin Farm, Whitstable: Landscape and Visual Note

Prepared on behalf of Parker Strategic Land

Project Ref:	28788/A5
Status:	Final Draft
Issue/ Rev:	
Date:	August 2021
Prepared by:	LT
Checked by:	LT
Authorised by:	LT

Barton Willmore LLP
The Blade, Abbey Square
Reading
RG1 3BE

Tel: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]

Ref: 28788/A5
Date: August 2021

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetation oil based inks.

CONTENTS

1.0	Introduction	1
2.0	Landscape Policy Context.....	2
3.0	Existing Lanscape and Visual Context	7
4.0	Landscape and Visual Considerations	12
5.0	Summary and Conclusion	19

ILLUSTRATIVE MATERIAL

Figure 1: Wider Site Context Plan

Figure 2: Site Context Plan

Figure 3: Topographic Features Plan

Figure 4: Landscape Character Plan

Figure 5: Site Appraisal Plan

Site Context Photographs 1 – 9

Appendix 1: Landscape Policy Extracts

Appendix 2: Landscape Character Assessment Extracts

1.0 INTRODUCTION

Overview

- 1.1 This Landscape and Visual Appraisal has been prepared to establish the sensitivity of the land at Bodkin Farm, Chestfield, Whitstable (the 'Site') and to identify the potential suitability of the Site to accommodate residential development set within a landscape strategy, in support for representations to the Issues and Options consultation for the new Canterbury Local Plan.
- 1.2 The objectives of this study are:
- To appraise the landscape character of the Site, its context and the function of the Site within the wider landscape, particularly in relation to existing landscape designations and policies;
 - To appraise the visibility of the Site; and
 - To identify the suitability of the Site to accommodate residential development.
- 1.3 The Site is located in the District of Canterbury, Kent, on the eastern edge of Whitstable, as illustrated on **Figure 1: Wider Site Context Plan** and **Figure 2: Site Context Plan**. The land in the vicinity of the Site comprises a settled landscape, with the coastal settlements of Whitstable and Herne Bay located on the generally low-lying coastal plain, with land rising inland to the south, as illustrated on **Figure 3: Topographical Features Plan**.
- 1.4 The Site is located immediately to the south of the A2990 Thanet Way and to the north of the residential properties along Maydowns Road. The residential areas of Whitstable, that is Chestfield and Swalecliffe, lie to the south-west and to the north-west, of the Site respectively. The Molehill Solar Farm is located on the eastern boundary of the Site; with Herne Bay located further to the east of the Site, beyond the wider agricultural landscape.
- 1.5 The Site is currently located in a Green Gap as designated in the Canterbury District Local Plan (2017), with reference to Policy OS6: Green Gaps, and, in particular, the Herne Bay and Whitstable Green Gap, with reference to Policy OS7.

2.0 LANDSCAPE POLICY CONTEXT

National Policy

National Planning Policy Framework (NPPF), 2021

- 2.1 The NPPF promotes a presumption in favour of sustainable development, defined as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*", and providing it is in accordance with the relevant up-to-date Local Plan, and policies set out in the NPPF including those identifying restrictions with regard to designated areas.
- 2.2 The NPPF states that "*the purpose of the planning system is to contribute to the achievement of sustainable development*".
- 2.3 Chapter 12 of the NPPF provides guidance on ensuring the delivery of good design. The NPPF requires development proposals to respond to local character and be visually attractive, as well as emphasising the need to integrate development proposals into the natural environment.
- 2.4 Chapter 15 of the NPPF provides guidance on conserving and enhancing the natural environment, such as by protecting and enhancing valued landscapes, (in a manner commensurate with their statutory status or identified quality in the development plan); and recognising the intrinsic character and beauty of the countryside. It notes that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement at a landscape scale.
- 2.5 The Site is not covered by landscape related designations identified in the NPPF which would restrict the overall scale, type or distribution of development, such as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, or a National Park.

District Policy

Canterbury District Council Local Plan (adopted July 2017)

- 2.6 The Canterbury Local Plan was adopted by the Council in 2017 and sets out the key planning policies for the area whilst aiming to:
 - "*Create well-designed new communities, with good access to jobs and services*"

- *Make sure there is enough housing, and different types of housing, to meet the needs of local people and support new job creation*
- *Protect sensitive landscape and wildlife areas, and other key environmental assets such as the World Heritage Site, the Area of Outstanding Natural Beauty and Conservation Areas*
- *Make certain that new infrastructure, such as transport, schools and health facilities, are provided in parallel with development*
- *Protect and strengthen town and village centres*
- *Support the growth of the Universities and Colleges*
- *Support development of new and improved cultural and leisure facilities.”*

2.7 The Site is located on the edge of Whitstable, which is identified in **Policy SP4: Strategic approach to location of development**, as one of the three urban areas which are the principal focus for development, provided that it would be acceptable in terms of environmental, transport and other planning factors, and would not result in the loss of sites identified for business and other specific uses.

2.8 Policy LB4: Landscape Character Areas, 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.

Development will be permitted if the following criteria are satisfied:

- a. Development would be appropriate to the economic and social wellbeing of the area;*
- b. The site selection can be adequately justified, with the siting of development minimising the impact;*
- c. Development would safeguard or strengthen tranquillity, features and patterns that contribute to the landscape character and local distinctiveness of the area;*
- d. The scale, design, materials and landscaping measures are appropriate and would lead to an enhancement of the character of the landscape; and*
- e. Development will promote maintenance, enhancement, and restoration of biodiversity as appropriate in accordance with policy LB9.*

All development should take into account the sensitivity of the particular landscape to accommodate change. Development, or associated land use change or land management, which does not significantly adversely affect the landscape character of an area, will normally be allowed. The development should have regard

to the Canterbury Landscape Character and Biodiversity Appraisal to identify the character areas and features affected."

2.9 Policy OS6: Green Gaps, states that:

"Within the Green Gaps identified on the Proposals Map (see also Insets 1,3 and 5) 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."

2.10 Policy OS7: Herne Bay and Whitstable Green Gap, states that:

"Within the Herne Bay and Whitstable Green Gap identified on the Proposals Map (Insets 3 and 5), development will be permitted where it does not:

- a. Result in a material expansion of the built up confines of the urban areas of Herne Bay or Whitstable; or*
- b. Significantly affect the open character or separating function of the Green Gap; and*
- c. Result in new isolated development within the Green Gap*

In those areas within the green gap where education, outdoor leisure uses or allotments are promoted, planning permission will be granted where in addition to the considerations set out in (a) to (c) above, built development shall be incidental, necessary to the function of those uses and located to have a minimal impact upon the open character of the green gap and provided there is no overriding conflict with other Policies of this Local Plan."

2.11 Other landscape related Policies, relevant to the Site include:

- Policy DBE3: Principles of Design
- Policy DBE9: Outdoor Lighting
- Policy LB2: Areas of High Landscape Value
- Policy LB8: Landscape Scale Biodiversity Networks
- Policy LB10: Trees, Hedgerows and Woodland

- Policy OS12: Green Infrastructure

Green Gaps and Local Green Spaces Review, April 2021

- 2.12 Canterbury City Council have prepared a review of Green Gaps and Local Green Spaces, as part of the evidence base for the new Local Plan. The introduction sets out the following:

“The green gap policies were originally formulated in 2002 reflecting national objectives to restrain built development outside urban areas and in the countryside. Within the Canterbury District there has been a gradual erosion of the open countryside and coalescence between built up areas due to development. Gradual coalescence can not only harm the character of the open countryside, but can also adversely impact the setting and special character of villages and the separate identity of the coastal towns.

The Green Gaps are intended to retain the separate identities of existing settlements by preventing their coalescence through development. The locations identified are considered to be important ‘pinch points’ where settlements are at particular risk of coalescence.”

- 2.13 Appendix A sets out a description of the Green Gap between Herne Bay and Whitstable (Policy OS7), noting that the Green Gap is:

“263.8ha formed of various land uses:

- *Open fields, green spaces, playing fields, playground and ball court*
- *Multiple roads including Thanet Way and Whitstable Road*
- *Railway line*
- *Wastewater Treatment Works*
- *Waste and recycling facilities*
- *Caravan / Holiday Park - Coast and ponds*
- *Commercial / market space*
- *Dispersed dwellings*
- *Solar panels”*

- 2.14 Within the review of Green Gaps and Local Green Spaces it makes reference to comments made within the Inspectors Report on the adopted Local Plan (2017), and with regard to the Herne Bay and Whitstable Green Gap, Policy OS7, it notes the following comment:

“Urban areas of Herne Bay and Whitstable - the Inspector said ‘...somewhat different to elsewhere, particularly in terms of education, leisure and allotment uses. This reflects the character of these coastal settlements.’”

- 2.15 Whilst the review provides a commentary on the “Intersection of LCA (Landscape Character Areas) and planning policies, recommendations”, “Changes to boundary or built environment”,

and “Other Evidence / Documents”, the review does not provide any justification for the specific boundary alignment or extent of the Green Gap, nor how, considering the variety of land uses and development within the Green Gap, how the Green Gap functions or is perceived.

- 2.16 Therefore, whilst the Green Gaps and Local Open Spaces Review recommends that the Green Gap between the urban areas of Herne Bay and Whitstable, as defined by Policy OS7, is **retained as existing**, there is no further evidence to substantiate this finding.

3.0 EXISTING LANDSCAPE AND VISUAL CONTEXT

Landscape Baseline

- 3.1 The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. This approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles. The description of each landscape is used as a basis for evaluation in order to make judgements to guide, for example, development or landscape management. The various levels of Landscape Character Assessment are shown on **Figure 3: Landscape Character Plan**.

National Landscape Character

- 3.2 As part of Natural England's responsibilities in delivering the Natural Environment White Paper, Biodiversity 2020 and the European Landscape Convention, Natural England has developed a series of National Character Area (NCA) profiles. These NCA profiles include an outline of the key characteristics that define broad landscape character areas. The Site is located within NCA 113: North Kent Plain. The key characteristics of the NCA 113: North Kent Plain most relevant to the Site and its surroundings are:

- *A diverse coastline (both in nature and orientation), made up of cliffs, intertidal sand and mud, salt marshes, sand dunes and shingle beaches. Much of the coastal hinterland has been built on, and the coast itself has been modified through the construction of sea walls, harbours and piers.*
- *...*
- *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.*

County Landscape Character

The Landscape Assessment of Kent (2004)

- 3.3 The Site is located within the area covered by the North East Kent Character Area Assessment and is identified as forming part of The Blean. The characteristic features of The Blean are described as:

- *"Densely wooded, rounded hilltops with sparse nucleic settlements and few roads within the woodland.*
- *Flat coastal plain.*
- *Haphazard seaside and leisure development.*

- *Neglected pasture near the coast - a high proportion of unfarmed land.*

District Landscape Character

Draft Canterbury Landscape Character and Biodiversity Appraisal (2012)

3.4 The Site is located within the Urban Edge Landscape Character Type, as identified in Figure 12 of the draft Canterbury Landscape Character and Biodiversity Appraisal. More specifically, the Site is situated within Landscape Character Area 9: Chestfield Gap. The key characteristics of the district LCA are set out below:

- *"Important area of open space separating the settlements of Swalecliffe, Chestfield, Studd Hill and Greenhill.*
- *Gently undulating London Clay overlain with poorly drained heavy soils.*
- *Open arable landscape mixed farming on Grade 3 agricultural land with small plots managed as pasture.*
- *Occasional small blocks of woodland (some ancient), plantation and mature tree belt associated with minor valley feature of West Brook.*
- *Crossed by transport corridors for London to Ramsgate Railway and the old Thanet Way A2990.*
- *Key designations comprise a Local Wildlife Site."*

3.5 As identified within the draft Canterbury Landscape Character and Biodiversity Appraisal, the Chestfield Gap is considered to exhibit a poor condition due to the high level of fragmentation caused by transport corridors and the incoherent enclosure pattern with fragmented and poorly maintained hedgerows. The Chestfield Gap is considered to have a Moderate sensitivity due to its importance as a strategic buffer between the towns of Whitstable and Herne Bay, as well as being a highly visible landscape. Guidelines for the district LCA are to Restore and Improve. The guidelines set out in the draft Canterbury Landscape Character and Biodiversity Appraisal are:

- *"Improve the overall visual quality of the area and promote its value as a green buffer between Herne Bay and Whitstable.*
- *Develop an improvement strategy to create a positive image to the area itself, whilst separating and creating distinctive identities to the neighbouring urban areas of Chestfield, Greenhill and Studd Hill.*
- *Assess new building proposals within and adjacent to the area to ensure that attractive edges are formed.*
- *Improve the appearance of the transport corridor of the old Thanet Way and London to Ramsgate Railway.*
- *Improve and enhance the visual and nature conservation interest of West Brook.*

- *Enhance declining hedgerows with sustainable native species to replace dead or dying elm in the longer term.*
- *Seek opportunities to create new woodlands around Purchas Wood."*

Landscape Character of the Site

- 3.6 The Site is located on land between the A2290, Thanet Way, to the north and existing residential properties along Maydowns Road and wider agricultural land to the south. To the west of the Site, there is an area of small pasture fields associated with horsiculture and separated by post and wire fences, set between Thanet Way, and the residential areas of Swalecliffe and Chestfield on the eastern edge of Whitstable. To the east of the Site, an area of Ancient Woodland, Purchas Wood, adjoins the eastern Site boundary in part, along with Molehill Solar Farm, which also adjoins the eastern boundary in part, and encompasses Purchas Wood. The Southeastern Railway Line runs to the north of, and parallel with, Thanet Way, with Chestfield and Swalefield Rail Station located approximately 700m to the west of the Site, as illustrated on **Figure 1: Wider Site Context Plan** and **Figure 2: Site Context Plan**.
- 3.7 The Site comprises the former farmstead of Bodkin Farm and associated buildings, many of which are derelict or in a poor state of repair, surrounded by existing mixed ornamental and native vegetation; and several pastoral fields, of varying size and set within a framework of boundary vegetation, as illustrated on **Figure 5: Site Appraisal Plan**.
- 3.8 The eastern and western boundaries of the Site are well contained by boundary vegetation, including existing hedgerows, scrub, treebelts and woodlands. Much of the southern boundary of the Site is also well contained, however, there has been some clearance of boundary vegetation at the rear boundaries of residential properties on Maydowns Road. Vegetation on the northern boundary of the Site, on the southern side of Thanet Road is more intermittent, with lengths of hedgerow and scrub, and some mounding.
- 3.9 Within the Site, there is a strong north-south hedgerow and tree belt running through the centre of the Site, with further subdivision in the eastern part of the Site reinforced by field boundary hedgerows.
- 3.10 The Site is located on the coastal plain, with land rising inland to the south, as illustrated on **Figure 3: Topographical Features Plan**. The Site is located on the northern end of a gentle spur, running north from higher land to the south. The central part of the Site is located generally at an elevation of 15m AOD, dropping to the west to below 10m AOD, and more gently to between 15m – 10m AOD to the east, as shown on **Figure 3: Topographical Features Plan**. The land in the vicinity of the Site is generally quite flat due to its coastal location, although some more elevated land is located approximately 2km to the south at Shrub Hill.

- 3.11 A public footpath passes east to west along the southern boundary of the Site, running along the southern edge of Bodkin Farm, along the northern edges of the rear gardens to properties along Maydowns Road, and along the southern edge of the fields in the eastern part of the Site. This local route connects the settlement of Whitstable to the north-west of the Site with Molehill Road to the south-east of the Site and is heavily overgrown with little sign of use.
- 3.12 A drainage ditch and farm pond are situated on the western Site boundary, both are overgrown and surrounded by scrubby vegetation, drainage ditches run along the eastern boundary, and along the field boundaries within the Site.
- 3.13 The Site is located in the Herne Bay and Whitstable Green Gap, but not covered by any other designation, and is approximately 240m north of the Blean Woods Area of High Landscape Value.

Visual Baseline

- 3.14 A visual appraisal has been undertaken to determine the relationship of the Site with its surroundings and its approximate extent of visibility within the wider landscape. The visibility of the Site is largely determined by the intervening landform, as topographic features such as ridgelines and subtle undulations block or curtail views towards the Site, especially where existing development, vegetation and landform contribute to visual screening or filtering of views.
- 3.15 Views in the vicinity of the Site are relatively constrained by the flat landscape where slight undulations in topography, the existing built form and existing vegetation, limit the extent of many views. Further south of the Site, from more elevated land, some longer views are available, extending north over the Site towards the coast, and these views are characterised by the high level of built development within the view.
- 3.16 There are views of the Site from the PRow that runs along the southern boundary of the Site. The views are characterised by views across arable fields, to surrounding field boundary vegetation, with glimpses to existing commercial and residential development on the edge of Whitstable, set within the surrounding framework of vegetation.
- 3.17 There are varying glimpsed views of the Site from Thanet Way, where there are breaks in the roadside/northern Site boundary vegetation. The slightly more elevated land in the western part of the Site is partially visible, through roadside vegetation, but generally seen set below vegetation crossing and surrounding the Site, as illustrated by **Site Context Photographs 1, 2 and 3**, the locations of which are shown on **Figure 2: Site Context Plan**. The eastern part of the Site, being of a lower elevation, more gently sloping, and being subdivided by field boundary vegetation and partially screened by roadside mounding, is afforded greater

screening from views. Where glimpses of the eastern part of the Site are obtained, they are contained by field boundary and surrounding vegetation, as illustrated by **Site Context Photographs 4, 5 and 6**, the locations of which are also shown on **Figure 2: Site Context Plan**.

- 3.18 To the east of the Site, where the land is generally flat there are open views across the landscape to the south, as illustrated by **Site Context Photographs 7, 8 and 9**, the locations of which are also shown on **Figure 2: Site Context Plan**.
- 3.19 Views from much of the other surrounding roads are limited by the foreground screening provided by roadside hedgerow and tree belt vegetation. As a result, where views over the surrounding landscape are available, they are generally limited to transient, brief glimpsed views of the landscape.

4.0 LANDSCAPE AND VISUAL CONSIDERATIONS

4.1 The key landscape and visual considerations in terms of accommodating residential development on the Site include:

- Sympathetic response to landscape character, including the North Kent Plains NCA; and The Blean and the Chestfield Gap LCAs
- Retention of a perceived Green Gap between Whitstable and Herne Bay
- Retention and enhancement of existing trees, hedgerows and woodlands
- Provision of a Green Infrastructure Network that incorporates the existing retained trees, hedgerows and woodlands, and contributes to a Landscape Scale Biodiversity Network
- Incorporation of the existing PRow along the southern boundary of the Site within a green corridor
- Consideration of views from existing residential properties along Maydowns Road

Landscape Strategy for Potential Residential Development on the Site

- Existing landscape features on the Site to be retained, including hedgerows, treebelts and trees
- Purchas Wood Ancient Woodland adjoining eastern boundary of the Site to be protected by a 15m buffer to Ancient Woodland
- Strengthening of the existing landscape framework, so as to assimilate development on to the Site, creating development parcels with relative physical and visual enclosure; and
- Strengthening existing boundary vegetation on the northern and eastern boundaries to assisting in screening potential residential development in views from Thanet Way and the wider landscape to the east
- Preventing physical and visual coalescence, and maintaining the perception of separation, between Herne Bay and Whitstable (the function of the Green Gap).

Landscape Character

National Landscape Character

4.2 The large scale NCA 113: North Kent Plain, where the character of large areas in the north, in which the Site is located, is predominantly urban, contains a large number of components along the diverse coastline provide a positive contribution to landscape character but are not designated for their scenic beauty. The relatively in-tact character of the large scale NCA

means that it is likely to have some capacity to accommodate potential residential development without undue consequences upon the diverse coastline or the woodland of the higher ground.

- 4.3 Potential residential development on the Site would not introduce any new or uncharacteristic elements into the extensive North Kent Plain, but would adjoin the existing settlement of Whitstable, one of the three settlements on the District of Canterbury identified for the focus of development, and would reflect the character and pattern of settlement within the northern part of the North Kent Plain. Potential residential development on the Site would replace an area of small irregular pasture fields without causing the loss of any characteristic landscape aspects of the North Kent Plain, such as the diverse coastline in the north of the NCA or the wooded higher ground in the south of the NCA.

County Landscape Character

- 4.4 The Blean is considered to have a condition described as 'Good', as although it presents a coherent pattern of landscape elements, development in the south of the area is piecemeal and unsympathetic land use interrupts woodland that is located on the rounded hills. The high level of coastal development in the north of the area, in the locality of the Site, also detracts from some views and there are few links between the areas of stronger ecological value along the coast and the woodland, where access is noted as limited. The unfarmed land near the coast illustrates that land use in the area is not intensive but development has a moderately negative impact on the area as a whole.
- 4.5 The Blean is considered to have a 'Moderate' sensitivity, as it contains one of the largest areas of ancient woodland within Kent. Although the tree cover is widespread on the hilltops, it stops abruptly on the lower slopes, allowing a moderate level of visibility. The type of tree cover in The Blean is distinctive but other historic features such as wet-fenced pastures on the coastal strip are becoming less distinct with recent built form also indistinct.
- 4.6 The Landscape Actions for The Blean are set out to be Conserve and Reinforce. The ancient characteristics of the woodland and limited access of the woodland lanes should be conserved, while the landscape pattern of the hedged farmland on the lower slopes should be reinforced with improved links to the woodland on higher ground so that the woodland character extends towards the coastal plain, encompassing the route of Thanet Way. Similarly, the natural features of the coastal plain such as open grassland and wet fencing should be reinforced and linked with the wooded characteristics of the southern Blean where there is natural drainage.
- 4.7 Potential residential development on the Site would not introduce any uncharacteristic elements into The Blean where **"haphazard seaside and leisure development"** and **"neglected pasture near the coast"** form the setting for the Site. Potential residential development on the Site would not affect ancient characteristics of The Blean identified for

conservation, such as woodland and limited access to the woodland lanes, and could positively contribute to reinforcing the landscape pattern of The Blean, through enhancing the existing hedges crossing and bordering the Site, located on the lower slopes of the Blean and by improving links to the woodland on higher ground so that the woodland character extends towards the coastal plain, and encompasses the route of Thanet Way.

District Landscape Character

Draft Canterbury Landscape Character and Biodiversity Appraisal (2012)

- 4.8 As set out within the draft Canterbury Landscape Character and Biodiversity Appraisal, the Chestfield Gap LCA is considered to exhibit a 'poor' condition due to the high level of fragmentation caused by transport corridors and the incoherent enclosure pattern with fragmented and poorly maintained hedgerows.
- 4.9 Potential residential development on the Site would adjoin the existing western settlement edge of Whitstable, set between Thanet Way to the north and residential properties along Maydowns Road to the south. However, residential development on the Site would be well-contained on the eastern boundary by existing retained and enhanced vegetation on the Site boundary, and by Purchas Wood Ancient Woodland, which is protected, to the immediate east of the Site.
- 4.10 As illustrated by **Site Context Photographs 1, 2, 3, 4, 5 and 6**, the locations of which are shown on **Figure 2: Site Context Plan**; whilst the Site is visible from Thanet Way, due to the combination of landform and vegetation, these are predominantly short-range views, limited to the Site, and do not extend over the wider landscape. However, to the immediate east of the Site, where the landform is shallower, there are open views across the wider landscape, as illustrated by **Site Context Photographs 7, 8 and 9**, the locations of which are also shown on **Figure 2: Site Context Plan**.
- 4.11 Potential residential development would be accommodated on the Site, set within an enhanced landscape framework, with enhancement to the boundary vegetation along Thanet Way, to provide additional screening to views from Thanet Way.
- 4.12 The existing vegetation on the eastern boundary would be enhanced, which along with the existing screening provide by Purchas Wood, which being Ancient Woodland is protected, would largely screen views of residential development in views from east of the Site, as illustrated by **Site Context Photograph 9**.
- 4.13 Whilst potential residential development on the Site would extend the settlement of Whitstable to the east, into the Chestfield Gap LCA; residential development would be set between existing

development to the north of Thanet Way and existing residential development along Maydowns Road, with an approximate extension of between 250m and 300m beyond existing development to the north and south respectively; and would extend up to the existing Molehill Solar Farm to the immediate east of the Site. Furthermore, Whitstable is one of three settlements in the District of Canterbury identified as the current focus of development.

- 4.14 Therefore, whilst there would be a change in character to this part of the Chestfield Gap LCA on the Site, and an extension of settlement into the Chestfield Gap LCA, the perception of a gap between Whitstable and Herne Bay would be maintained to the east of the Site, where the most open views across the wider landscape separating the two settlements are currently obtained, as illustrated by **Site Context Photographs 7 and 8**, the locations of which are shown on **Figure 2: Site Context Plan**. Furthermore, from the edge of the settlement of Herne Bay, potential residential development on the Site would not be noticeable in views looking west across the remaining gap, towards Whitstable, as illustrated by **Site Context Photograph 9**, such that the perception of separation between the settlements of Whitstable and Herne Bay would also be maintained.
- 4.15 The Landscape Strategy associated with potential residential development would also positively contribute to many of the guidelines for the Chestfield Gap LCA, in that it would create an attractive edge to Whitstable, improve the appearance of the transport corridor of Thanet Way, enhance declining hedgerows, and provide opportunities to create new woodland around Purchas Wood. Potential residential development would not affect the visual and nature conservation interest of West Brook, which is physically and visually separated from the Site by the Molehill Solar Farm.
- 4.16 Whilst there would be a limited extension into the Chestfield Gap LCA, a tangible green gap, with views of the intervening landscape would be maintained between Whitstable and Herne Bay, such that the green buffer between Whitstable and Herne Bay would be maintained.

Policy Consideration

- 4.17 The Site complies with Policy SP4: Strategic approach to development insofar as it is located on the edge of Whitstable, which is identified as one of the three urban areas which are the principal focus for development; provided that it would be acceptable in terms of environmental, transport and other planning factors, and would not result in the loss of sites identified for business and other specific uses.
- 4.18 With regard to other landscape related Policies, relevant to the Site, potential residential development on the Site would respond to Policy DBE3: Principles of Design, in that it would deliver *"high quality, sustainable inclusive design, which reinforces and positively contributes to its local context creating attractive, inspiring and safe place"*.

- 4.19 Any outdoor lighting associated with potential residential development would be considered with reference to Policy DBE9: Outdoor Lighting, so as to minimise light glare, light trespass, light spillage and sky glare through using the best available technology to minimise light pollution and conserve energy; and does not adversely impact residential amenity, sites of nature conservation interest or heritage assets, or protected landscapes.
- 4.20 With regard to Policy LB2: Areas of High Landscape Value (AHLV), the Site is not located within The Blean AHLV, being some 240m to the south of the boundary at its closest. From more elevated land to the south of the Site, within The Blean, some longer views are available, extending north over the Site towards the coast, however, these views are characterised by the high level of built form within the view, and any potential residential development would be seen as a small component of in the context of a much wider expanse of existing development.
- 4.21 The Landscape Strategy associated with potential residential development on the Site would retain and enhance the key landscape features of the Site, such as trees hedgerows and tree belts, incorporating them into an enhanced landscape framework across and bounding the Site. Purchas Wood Ancient Woodland which adjoins the eastern boundary of the Site would be protected by a 15m landscape buffer. Therefore, the Landscape Strategy for the Site would accord with Policy LB10: Trees, Hedgerows and Woodland. The Landscape Strategy for the Site would provide a comprehensive Green Infrastructure Strategy for the Site, providing green space networks which would enhance the connectivity of the existing biodiversity network on the Site, and strengthen the connections with the wider biodiversity network, such that it would accord with Policy LB8: Landscape Scale Biodiversity Networks and Policy OS12: Green Infrastructure.
- 4.22 With regard to Policy LB4: Landscape Character, as demonstrated, proposals for the Site would be informed by, and would be sympathetic to, the landscape character of the locality. The proposals would take into account the sensitivity of the Chestfield Gap landscape to accommodate change, such that potential residential development, set within an appropriate landscape and green infrastructure framework, would be successfully assimilated into the immediate and wider landscape, taking account of the key characteristics of the Chestfield Gap LCA.
- 4.23 The Site is adjacent to the existing settlement edge of Whitstable, in an area already influenced by existing development, and adjoins Thanet Way, and therefore exhibits limited tranquillity, in terms of noise, lighting and activity. The proposals would consider the existing features and patterns that contribute to the landscape character and local distinctiveness of the area; and promote a scale of development, design and materials and landscaping measures which would be appropriate to, and would lead to, an enhancement of the character of the landscape;

and would promote the maintenance, enhancement, and restoration of biodiversity. Therefore, potential residential development and the associated Landscape Strategy on the Site would positively contribute to the objectives of Policy LB4: Landscape Character Areas.

- 4.24 With regard to Policy OS6 Green Gaps and Policy OS7 Herne Bay and Whitstable Green Gap, the Site adjoins the existing western settlement edge of Whitstable, set between Thanet Way to the north and residential properties along Maydowns Road to the south, with the residential areas of Whitstable, that is Chestfield and Swalecliffe, to the south-west and to the north-west, of the Site respectively, and is therefore in an area already influenced by existing development, and Thanet Way. The Site is well-contained on the eastern boundary by vegetation on the Site boundary, and by Purchas Wood Ancient Woodland, which is protected, to the immediate east of the Site. The Site is separated from the Green Gap to the east of the Site by the Molehill Solar Farm. The Green Gap to the east of Molehill Solar Farm comprises land that is generally flat, with more open views across the landscape to the south, as illustrated by **Site Context Photographs 7, 8 and 9**, the locations of which are also shown on **Figure 2: Site Context Plan**, and which provides a tangible green gap, with views of the intervening landscape, between Whitstable and Herne Bay. The Green Gaps and Local Open Space Review does not provide any justification for the specific boundary alignment or extent of the Green Gap for the Green Gap between Whitstable and Herne Bay to substantiate the finding that the Green Gap should be **retained as existing**. However, considering the existing landscape and visual context of the Site, the Site could be removed from the Green Gap, with sufficient extent of intervening landscape, to the east of the Site, remaining to provide a green buffer, effectively functioning as a Green Gap between Whitstable and Herne Bay.
- 4.25 If the Site were to remain within the Green Gap, whilst residential development on the Site would extend into the Herne Bay and Whitstable Green Gap, as defined in Policy OS6, it would not *"significantly affect the open character of the Gap"*, with the most open part of the Gap between Whitstable and Herne Bay being maintained, as illustrated by **Site Context Photographs 7, 8 and 9**. Furthermore, residential development on the Site would not *"lead to coalescence between existing settlements"*.
- 4.26 Nor would residential development on the Site *"result in new isolated and obtrusive development in the Green Gap"*.
- 4.27 Likewise, specifically with regard to Policy OS7: Herne Bay and Whitstable Green Gap, the *"expansion of the built-up confines of the urban areas"* of Whitstable would result in a relatively limited extension eastwards into the Green Gap of some 250m to 300m east of existing urban development; but would not *"significantly affect the open character or separating function of the Green Gap"*; and would not *"result in new isolated development within the Green Gap"*.

4.28 Therefore, residential development could be accommodated on the Site, without a significant effect on the open character or separating function of the Green Gap between Whitstable and Herne Bay.

5.0 SUMMARY AND CONCLUSION

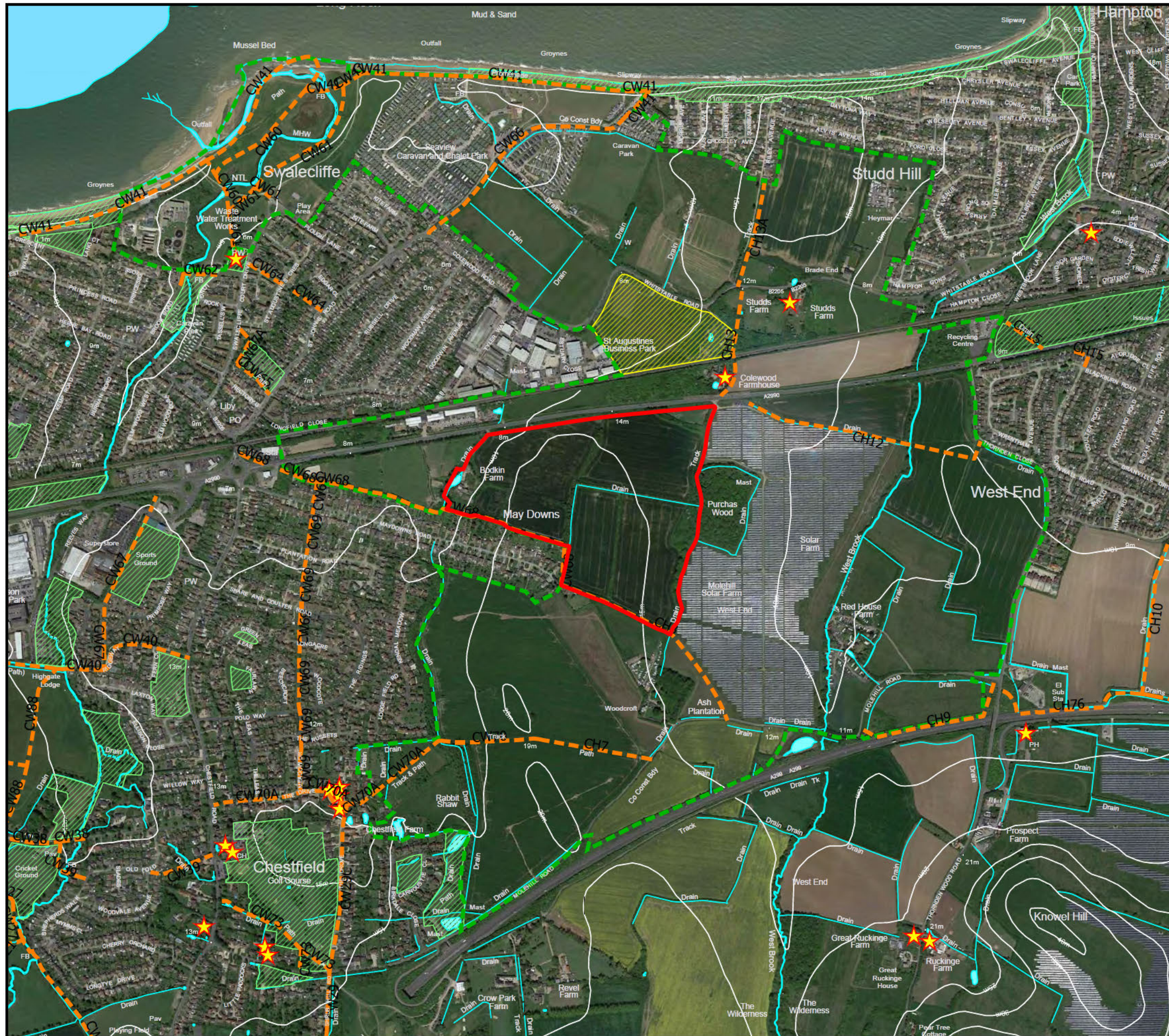
- 5.1 The Site is located on the eastern edge of Whitstable, as illustrated on **Figure 1: Wider Site Context Plan** and **Figure 2: Site Context Plan**. The land in the vicinity of the Site comprises a settled landscape, with the coastal settlements of Whitstable and Herne Bay located on the generally low-lying coastal plain, with land rising inland to the south, as illustrated on **Figure 3: Topographical Features Plan**.
- 5.2 The Site is located immediately to the south of the A2990 Thanet Way and to the north of the residential properties along Maydowns Road. The residential areas of Whitstable, that is Chestfield and Swalecliffe, lie to the south-west and to the north-west, of the Site respectively. The Molehill Solar Farm is located on the eastern boundary of the Site; with Herne Bay located further to the east of the Site, beyond the wider agricultural landscape.
- 5.3 The Site is located in a Green Gap as designated in the Canterbury District Local Plan (2017), with reference to Policy OS6: Green Gaps, and, in particular, the Herne Bay and Whitstable Green Gap, with reference to Policy OS7.
- 5.4 The Site is located within NCA 113: North Kent Plain, and within The Blean LCA as defined in the North East Kent Character Area Assessment. The Site is located within the Urban Edge Landscape Character Type, as defined in the draft Canterbury Landscape Character and Biodiversity Appraisal, and more specifically, the Site is within Landscape Character Area 9: Chestfield Gap, as illustrated on **Figure 4: Landscape Character Plan**.
- 5.5 Potential residential development on the Site would adjoin the existing western settlement edge of Whitstable, set between Thanet Way to the north and residential properties along Maydowns Road to the south. However, residential development on the Site would be well-contained on the eastern boundary by existing retained and enhanced vegetation on the Site boundary, and by Purchas Wood Ancient Woodland, which is protected, to the immediate east of the Site.
- 5.6 As illustrated by as illustrated by **Site Context Photographs 1, 2, 3, 4, 5 and 6**, the locations of which are shown on **Figure 2: Site Context Plan**; whilst the Site is visible from Thanet Way, due to the combination of landform and vegetation, these are predominantly short-range views, limited to the Site, and do not extend over the wider landscape. However, to the immediate east of the Site, where the landform is shallower, there are open views across the wider landscape, as illustrated by **Site Context Photographs 7, 8 and 9**, the locations of which are also shown on **Figure 2: Site Context Plan**.

- 5.7 Potential residential development would be accommodated on the Site, set within an enhanced landscape framework, with enhancement to the boundary vegetation along Thanet Way, to provide additional screening to views from Thanet Way.
- 5.8 The existing vegetation on the eastern boundary would be enhanced, which along with the existing screening provide by Purchas Wood, which being Ancient Woodland is protected, would largely screen views of residential development in views from east of the Site, as illustrated by **Site Context Photograph 9**.
- 5.9 Potential residential development on the Site would extend the settlement of Whitstable to the east, into the Chestfield Gap LCA; however, residential development would be set between existing development to the north of Thanet Way and existing residential development along Maydowns Road, with an approximate extension of between 250m and 300m beyond existing development to the north and south respectively; and would extend up to the existing Molehill Solar Farm to the immediate east of the Site. Furthermore, Whitstable is one of three settlements in the District of Canterbury identified as the focus of development.
- 5.10 Therefore, whilst there would be a change in character to this part of the Chestfield Gap LCA on the Site, and an extension of settlement into the Chestfield Gap LCA, the perception of a gap between Whitstable and Herne Bay would be maintained to the east of the Site, where the most open views across the wider landscape separating the two settlements are currently obtained, as illustrated by **Site Context Photographs 7 and 8**. Furthermore, from the edge of the settlement of Herne Bay, potential residential development on the Site would not be noticeable in views looking west across the remaining gap towards Whitstable, as illustrated by **Site Context Photograph 9**, such that the perception of separation between the settlements of Whitstable and Herne Bay would also be maintained.
- 5.11 The Landscape Strategy associated with potential residential development would also positively contribute to many of the guidelines for the Chestfield Gap LCA, in that it would create an attractive edge to Whitstable, improve the appearance of the transport corridor of Thanet Way, enhance declining hedgerows, and provide the opportunities to create new woodland around Purchas Wood. Potential residential development would not affect the visual and nature conservation interest of West Brook, which is physically and visually separated from the Site by the Molehill Solar Farm.
- 5.12 The proposals for the Site would therefore be informed by, and would be sympathetic to, the landscape character of the locality. The proposals would take into account the sensitivity of the Chestfield Gap landscape to accommodate change, such that potential residential development, set within an appropriate landscape and green infrastructure framework, would be successfully assimilated into the immediate and wider landscape, taking account of the key

characteristic of the Chestfield Gap LCA, Therefore, potential residential development and associated Landscape Strategy on the Site would positively contribute to the objectives of Policy LB4: Landscape Character Areas.

- 5.13 With regard to Policy OS6 Green Gaps and Policy OS7 Herne Bay and Whitstable Green Gap, the Site adjoins the existing western settlement edge of Whitstable, set between Thanet Way to the north and residential properties along Maydowns Road to the south, with the residential areas of Whitstable, that is Chestfield and Swalecliffe, to the south-west and to the north-west, of the Site respectively, and is therefore in an area already influenced by existing development, and Thanet Way. The Site is well-contained on the eastern boundary by vegetation on the Site boundary, and by Purchas Wood Ancient Woodland, which is protected, to the immediate east of the Site. The Site is separated from the Green Gap to the east of the Site by the Molehill Solar Farm. As noted, the Green Gap to the east of Molehill Solar Farm comprises land that is generally flat, with more open views across the landscape to the south, as illustrated by **Site Context Photographs 7, 8 and 9**, the locations of which are also shown on **Figure 2: Site Context Plan**, and which provides a tangible green gap, with views of the intervening landscape, between Whitstable and Herne Bay. The Green Gaps and Local Open Space Review does not provide any justification for the specific boundary alignment or extent of the Green Gap for the Green Gap between Whitstable and Herne Bay to substantiate the finding that the Green Gap should be **retained as existing**. However, considering the existing landscape and visual context of the Site, the Site could be removed from the Green Gap, with sufficient extent of intervening landscape, to the east of the Site, remaining to provide a green buffer, effectively functioning as a Green Gap between Whitstable and Herne Bay.
- 5.14 If the Site were to remain within the Green Gap, whilst residential development on the Site would extend into the Herne Bay and Whitstable Green Gap, as defined in Policy OS6, it would not *"significantly affect the open character of the Gap"*, with the most open part of the Gap between Whitstable and Herne Bay being maintained, as illustrated by **Site Context Photographs 7, 8 and 9**. Furthermore, residential development on the Site would not *"lead to coalescence between existing settlements"*. Nor would residential development on the Site *"result in new isolated and obtrusive development in the Green Gap"*.
- 5.15 Likewise, specifically with regard to Policy OS7: Herne Bay and Whitstable Green Gap, the *"expansion of the built-up confines of the urban areas"* of Whitstable would result in a relatively limited extension eastwards into the Green Gap of some 250m to 300m east of existing urban development; but would *not "significantly affect the open character or separating function of the Green Gap"*; and would not *"result in new isolated development within the Green Gap"*.
- 5.16 In conclusion, it is considered that the Site has the capacity to successfully accommodate residential development set within an appropriate landscape framework, being informed by,

and sympathetic to, the immediate and wider landscape; and without, whether or not retained within the Green Gap, a significant effect on the open character or separating function of the Green Gap between Whitstable and Herne Bay.



The scaling of this drawing cannot be assured

Revision _____ Date _____ Drn _____ Ckd _____

LEGEND

- Site Boundary
- Existing Water Courses and Features ^
- Contours/Spot Heights (Metres AOD) ^
- Public Rights of Way *
- Listed Buildings ~
- Green Gap +
- Open Space +
- Protection of Open Space +

Sources:

- ^ OS Mapping
- ~ Historic England National Monument Record GIS Data Set
- * Kent County Council Definitive Map
- + Canterbury City Council Local Plan Adopted 2017

FIGURE 5
 Project
**Bodkin Farm,
 Whitstable Kent**
 Drawing Title
Site Appraisal Plan

Date	Scale	Drawn by	Check by
23.07.2021	1:10,000	OF	-
Project No	Drawing No		Revision
28788	LN-LP-14		-

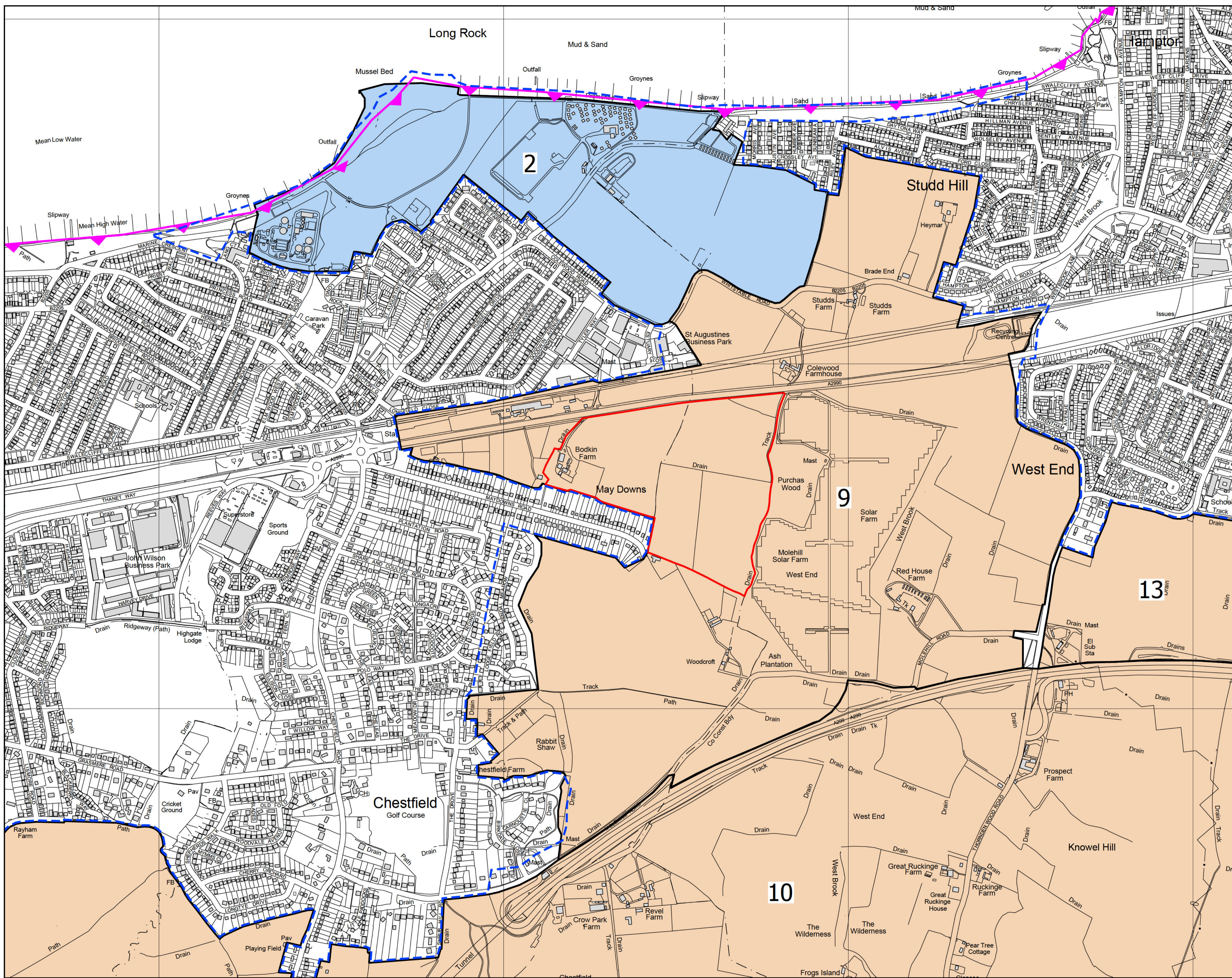
0 100 200 300 400 500m

DRAFT **BARTON WILLMORE**

Town Planning • Master Planning & Urban Design • Architecture •
 Landscape Planning & Design • Infrastructure & Environmental Planning •
 Heritage • Graphic Communication •
 Communications & Engagement • Development Economics

bartonwillmore.co.uk

Offices at Birmingham Bristol Cambridge Cardiff Ebbwfleet Edinburgh
 Glasgow Leeds London Manchester Newcastle Reading Southampton



Legend

- Site Boundary
- National Character Area Profiles #
Area 113, North Kent Plain
- Kent Landscape Character Areas ~
The Blean
- Canterbury Landscape Character Areas *
Coastal Landscape Type
Character Area 2: Swalecliffe
- Urban Edge Landscape Type
Character Area 9: Chestfield Gap
Character Area 10: Chestfield Wooded Farmland
Character Area 13: Greenhill and Eddington Fringe

Sources:
 # Natural England GIS Data Set
 * Canterbury Landscape Character and Biodiversity Appraisal Draft August 2012
 ~ Kent County Council GIS - Kent Landscape Information System - Landscape Character Areas

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation. Inset using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

FIGURE 4
 Project: Bodkin Farm, Whitstable Kent
 Drawing Title: Landscape Character Plan

Date: 23.07.2021	Scale: 1:5,000 @A1 1:10,000 @A3	Drawn by: LH/OF	Check by: LT
Project No: 28788	RG-LP-02	Revision: -	

DRAFT WILLMORE

Town Planning • Master Planning & Urban Design • Architecture •
 Landscape Planning & Design • Infrastructure & Environmental Planning •
 Heritage • Graphic Communication •
 Communications & Engagement • Development Economics

bartonwillmore.co.uk

Offices at Birmingham Bristol Cambridge Cardiff Edinburgh
 Glasgow Leeds London Manchester Newcastle Reading Southampton