

REPORT ON DEVELOPMENT POTENTIAL FOR ST EDMUND'S SCHOOL, CANTERBURY

GORSEFIELD, GILES LANE, CANTERBURY, KENT, CT2 7LR

LEE EVANS PLANNING REF: P3682

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EXECUTIVE SUMMARY

Lee Evans Planning have been instructed by St Edmund's School, Canterbury, to advise on the current and emerging planning policy context for the building referred to as Gorsefield and adjoining land - hereafter referred to as the **Gorsefield site** - situated on the south side of Giles Lane, Canterbury, Kent, CT2 7LR.

This Paper has been prepared to advise on the planning policy context against which planning applications will be considered and thus provide an indication of development potential.

In Summary:

- The Adopted Local Plan 2006, which had a timeframe up to 2011 and predates the NPPF, allocates various sites within and adjoining the City for development.
- The Local Plan is currently being reviewed and was subject to Independent Examination during 2015 and 2016. The Inspector's Report is awaited.
- The Gorsefield site is not identified on the Proposals Map to the Adopted or Emerging Local Plan as a Site Allocation for new development.
- The land is considered to be outside the confines of the City of Canterbury - the whole of the St Edmund's School campus and also the campus of the adjoining University of Kent lie outside the defined confines of the City.
- The Gorsefield site may be suitable for development for a variety of uses such as student accommodation or Care Home, or other developments, subject to the grant of planning permission.
- In considering the development potential of the Gorsefield site, appropriate regard must be paid to the Policies of the Adopted and Emerging Local Plans and other material considerations, including the National Planning Policy Framework (NPPF) and the appropriate weight that can be given to the Emerging Local Plan.
- The NPPF stresses the importance of providing new homes, in particular, through the effective use of previously developed land and buildings.
- Although the Emerging Local Plan Inspector has set out the Objectively Assessed Need for housing for the District up to 2031, through his August 2015 and December 2016 letters, at 16,000 units, he is yet to consider whether the Plan, as a whole, meets this requirement and whether the Council has an identified 5 year housing land supply with a buffer of 5%.
- Paragraph 49 of the NPPF advises that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the Local Planning Authority cannot demonstrate a 5 year supply of deliverable housing sites.
- Even if it is determined that the Council has a 5 year land supply, the NPPF encourages the residential reuse of buildings and previously developed land.
- The property, Gorsefield, is currently used as boarding accommodation for school pupils.
- The building and its immediately adjoining land comprise previously developed land and reuse for residential would be in accordance with the sustainability and housing elements of the NPPF and the principles of the Adopted and Emerging Local Plan.
- The adjoining land, although used informally for recreation, etc. by the school does not constitute previously developed land as defined in the NPPF.
- Although planning permission was refused in 2000 for the residential development of this land, the planning policy context and the physical context of the Gorsefield site have changed significantly since then.
- Although the site falls within the Canterbury Area of High Landscape Value, this designation is principally to protect the historic setting of the City.
- Given the physical separation of the Gorsefield site from the Southern Slopes of the University by the post-2000 construction of the University Innovation Centre and, most recently, by the four-storey Turing College, the Gorsefield site does not form part of the historic setting of the City.
- The Gorsefield site is now enclosed by the school and University developments and does not form part of the wider countryside that planning policies seek to protect.

1. INTRODUCTION

- 1.1 Lee Evans Planning have been instructed by St Edmund's School to advise on the current and emerging planning policy context for the Gorsefield site.
- 1.2 This report is based on information available at the time of publication.
- 1.3 The views of the Local Planning Authority, Canterbury City Council, on the sites' potential have not been sought.
- 1.4 This Paper has been prepared to advise on the planning policy context against which planning applications will be considered and thus provide an indication of development potential.
- 1.5 Attention is drawn to Paragraph 2 of the National Planning Policy Framework (NPPF) which advises that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.
- 1.6 In this case, the relevant Development Plan is the 2006 Adopted Canterbury Local Plan which does not allocate the site for development.
- 1.7 However, the 2006 Plan currently under Review. The Review Plan was subject to independent Examination in 2015 and 2016 but has not yet been Adopted.
- 1.8 As part of the Gorsefield site constitutes previously developed land/buildings, planning applications would be considered against the National and Local Planning Policy context for previously developed land and buildings and also in the light of other material considerations.
- 1.9 Paragraph 216 of the NPPF advises that decision-takers may give weight to relevant policies in Emerging Plans according to:

- the stage of preparation of the Emerging Plan;
- whether there are unresolved objections; and
- the degree of consistency of the policies of the Emerging Plan to the NPPF.

1.10 Given the existing and changing planning policy context for the area, any prospective purchasers should make their own enquiries to satisfy themselves as to the development potential of the site.***

1.11 This Paper is structured as follows:

- **Section 2 - The Gorsefield Site and Its Context and Planning History**
- **Section 3 - Local and National Planning Policy Context**
- **Section 4 - Analysis of Planning Policy Context and Other Material Considerations**

*** *The details contained in this Report are for guidance only.*

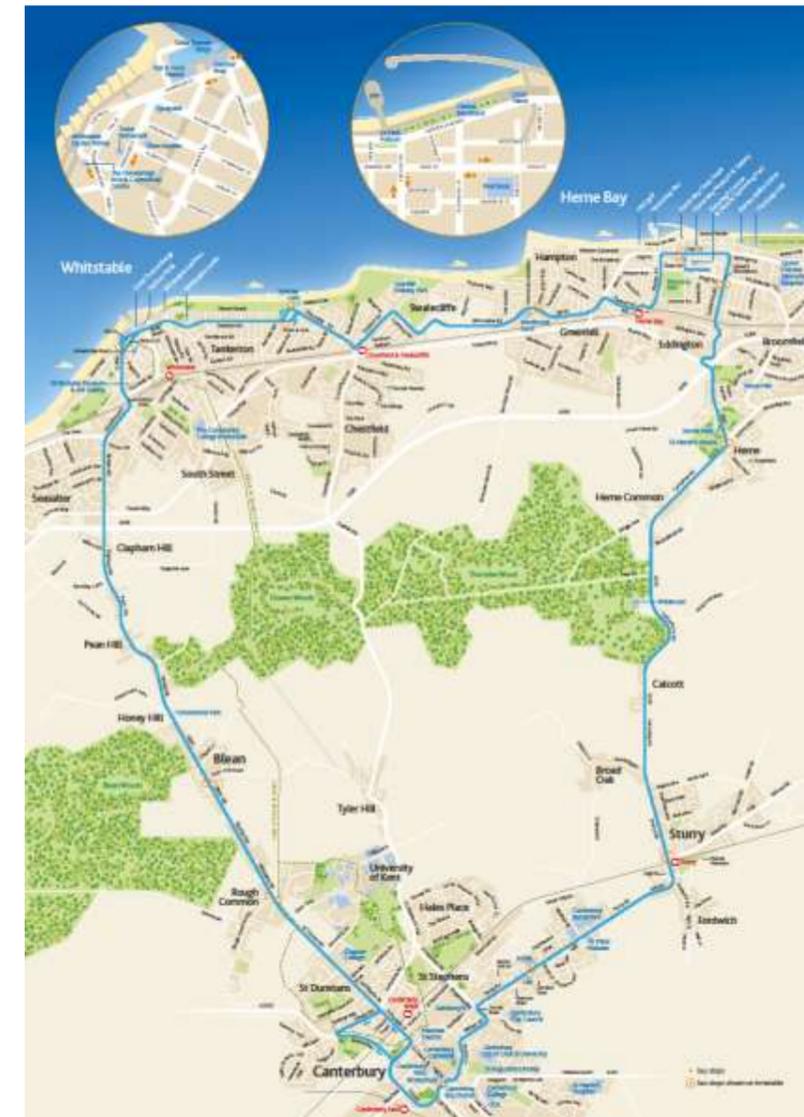
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- 2.17 There is a gated entrance to this undeveloped site from Giles Lane. The land is enclosed by trees and hedgerows.
- 2.18 The St Edmund's School playing fields lie to the north of Giles Lane.
- 2.19 Planning permission was granted in 1998, 2002, 2007 and 2010 for the development of part of the undeveloped land to provide a large extension to the Girls Boarding Accommodation provided within Gorsefield - see below.
- 2.20 The site in total extends to 0.79 hectares (1.78 acres).

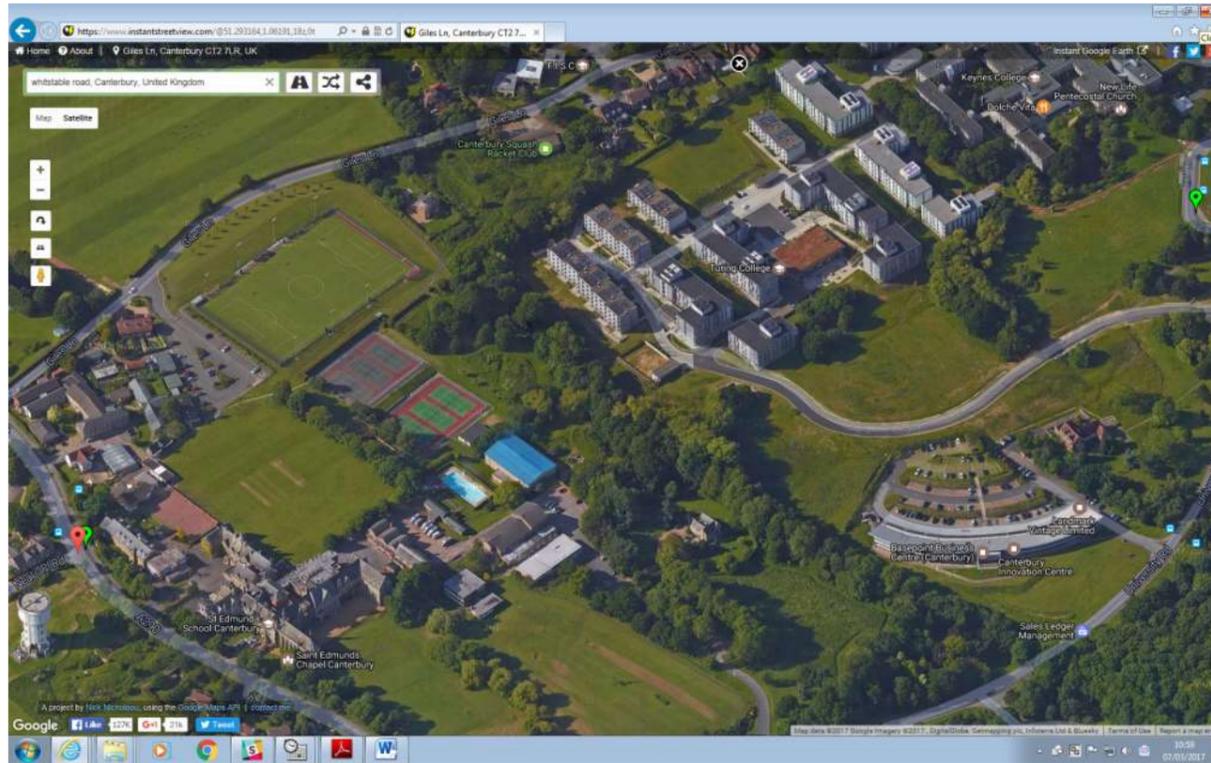
The Site Context

- 2.21 Gorsefield is adjoined on its south-western boundary by the school campus and, in particular, the floodlit and artificial surfaced playing field.
- 2.22 The Canterbury Squash Club with its squash courts/Clubhouse and car parking abuts the north-eastern boundary of the overall site.
- 2.23 Part of the University of Kent Campus lies to the south-east - the recently completed Turing College development - four-storey student accommodation.
- 2.24 Giles Lane is a public highway which links the University Campus to the east with A290, Whitstable Road to the west.
- 2.25 National Cycle Route 1, running from Canterbury to Whitstable and beyond, runs along Neal's Place Road and then shares the footway along the southern side of Whitstable Road to a signal controlled junction, before then leaving in a northerly direction through the University Campus and onwards towards Blean.
- 2.26 The Canterbury, Whitstable and Herne Bay 'triangle' bus runs regular services along Whitstable Road, nearby.



Bus Route Map





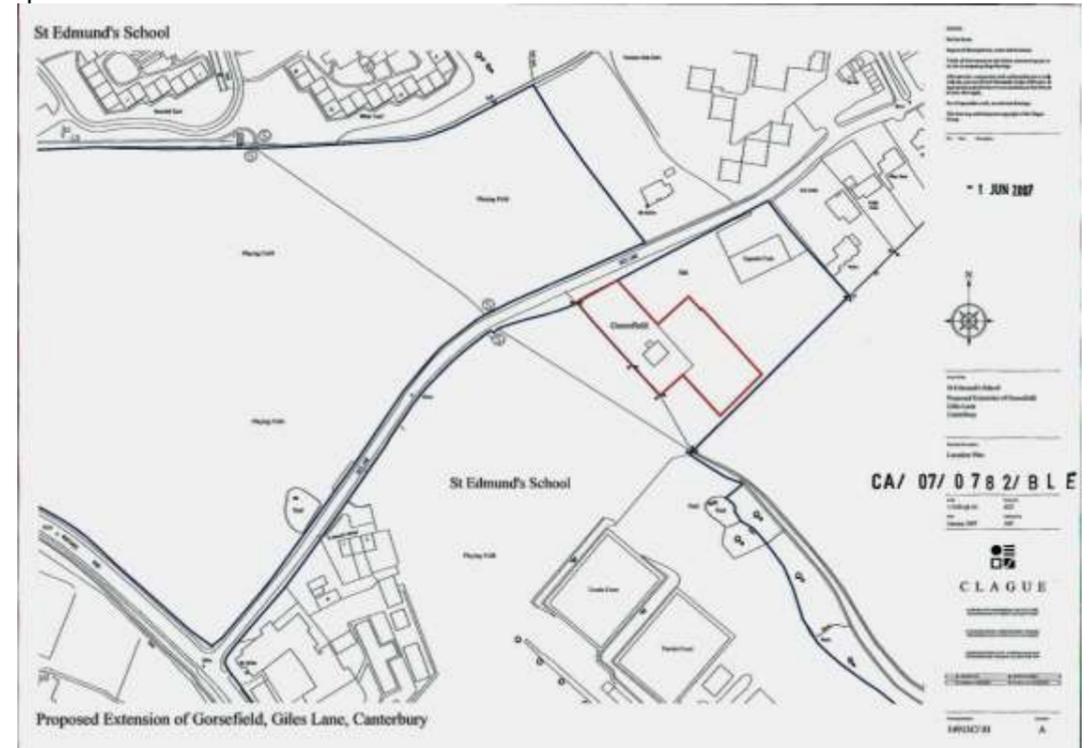
Google Earth Image

Planning History

- 2.27 There have been a number of planning applications over the years for further developments at the school.
- 2.28 Planning permission was refused under reference **CA/00/00640** for the development of the Gorsefield land with 14 No. dwellings and the refurbishment of Gorsefield House for dormitory residential use.
- 2.29 **There is no site plan on the Council's website indicating the extent of this application site.**
- 2.30 **However, the Council's 'interactive' map indicates that the application site extended to include part of the playing fields to the north of Giles Lane.**
- 2.31 **Does the School have a copy of the site plan so that this can be clarified?**
- 2.32 The refusal was on the basis that the development would be outside any town or village boundary and would, therefore, be contrary to planning policy. It was also considered that the development would detract from the rural character of the area and the undeveloped nature of the Valley Slopes overlooking and forming the setting of the City of Canterbury and would be contrary to planning policies.
- 2.33 Planning permission was granted under reference **CA/02/00826** for an extension to the Girls Boarding Accommodation.

2.34

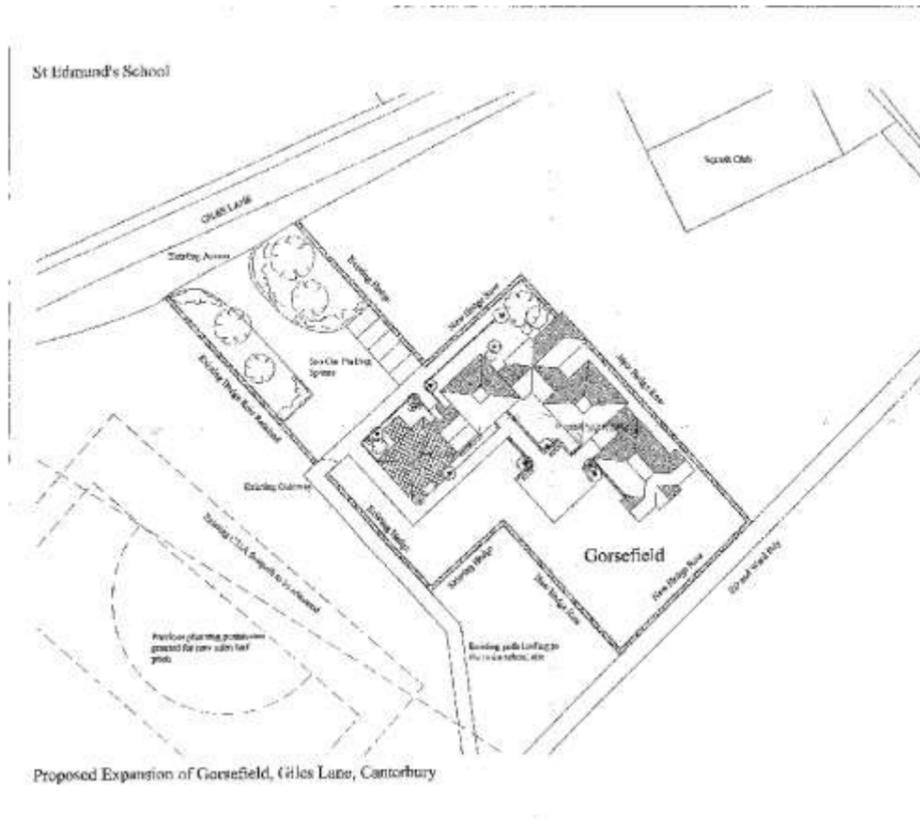
This permission was renewed under reference **CA/07/00782**.



Location Plan from 2007 Planning Application



Section Drawings from 2007 Planning Application



Site Layout from 2007 Planning Application

- 2.35 In 2010, a new planning permission was granted to replace the 2007 permission (reference **CA/10/00528**).
- 2.36 The extent of the application site with the development scheme are shown above.
- 2.37 The permitted development allows for substantial new development as an extension to Gorsefield to provide an 'L' shaped boarding house with vehicular access from Giles Lane and parking within the existing garden.
- 2.38 The facility would provide residential accommodation for 37 pupils, a Warden and Deputy Warden and also a Common Room and ancillary facilities.
- 2.39 More recently, planning permission was granted under reference **CA/16/02609** for a new classroom block to be constructed adjoining the school's Giles Lane Car Park.



Proposed Elevations AA, BB & CC

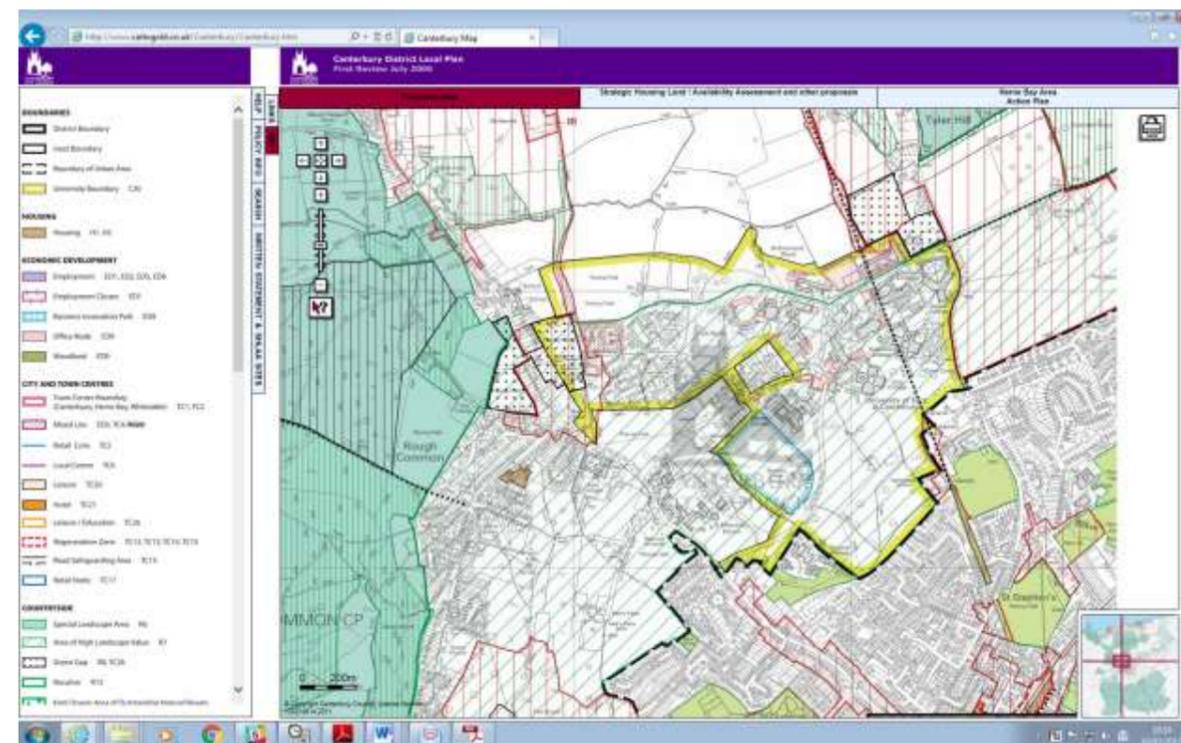
3. LOCAL AND NATIONAL PLANNING POLICY CONTEXT

3.1 The Adopted Local Plan is the **Canterbury District Local Plan 2006** which has a timeframe up to 2011.

3.2 The Gorsefield site is not identified for any form of development on the Proposals Map to the Adopted Local Plan.

3.3 Attention is also drawn to the Saved Policies of the Local Plan to be taken into account and against which planning applications would be considered:

- H1 - Housing;
- ED8 - University of Kent;
- ED11 - Economic Development;
- H4 - affordable housing;
- R1 - conversion of rural buildings;
- R3 and R4 - conversion and erection of new buildings to diversify the rural economy;
- R6 - Areas of High Landscape Value;
- R9 - tourism accommodation and facilities;
- TC7 - Tourism Development;
- BE1 - high quality design;
- BE2 - Public Realm;
- BE3 - Requirements for Design Statements;
- BE15 and BE16 - Archaeology;
- NE1 - Protected Species and Habitats;
- NE5 - Trees, Woodlands and Hedgerows;
- C1 - Transport;
- C4 - Transport Assessment/Travel Plan;
- C9 - Car Parking and Appendix 2 - Vehicle and Cycle Parking Standards;
- C11 - Provision of Social and Physical Infrastructure;
- C14 - Health Facilities;
- C16 - Education provision;
- C20 - University of Kent;
- C22 - Loss of Institutional Land or Building to Other Uses
- C28 - Provision of New Open Space;
- C31 - Requirement for Drainage Impact Assessment
- C37 - Provision of Infrastructure;
- C38 - Renewable Energy;
- IMP2 - Section 106 Agreement and Developer Contributions.



Proposals Map to Adopted Local Plan 2006

3.4 Regard must also be made to the relevant Supplementary Planning Documents.

3.5 The Adopted Canterbury Local Plan 2006 only has a timeframe up to 2011. The NPPF advises on the weight to be given to the Saved Policies of Local Plans which were adopted before the NPPF.

3.6 In 2014, the Council published its New Local Plan for consultation - the **Canterbury Local Plan Review Publication Draft 2014**.

3.7 The Draft Plan was the subject of Examination during 2015 and 2016. From February 2017 to March 2017, the Council consulted on Main Modifications, including those changes required by the Inspector.

3.8 All duly made representations will be sent to the Planning Inspector for his consideration as part of the Examination of the Local Plan. Further Hearings will only be scheduled exceptionally.

3.9 Following this, the Inspector will complete his Report, recommending any Main Modifications that he considers necessary to make the Plan 'sound'.

3.10 The 2006 Local Plan predates the **National Planning Policy Framework (NPPF) (2012)** and also the **National Planning Practice Guidance (NPPG) (2014)**.

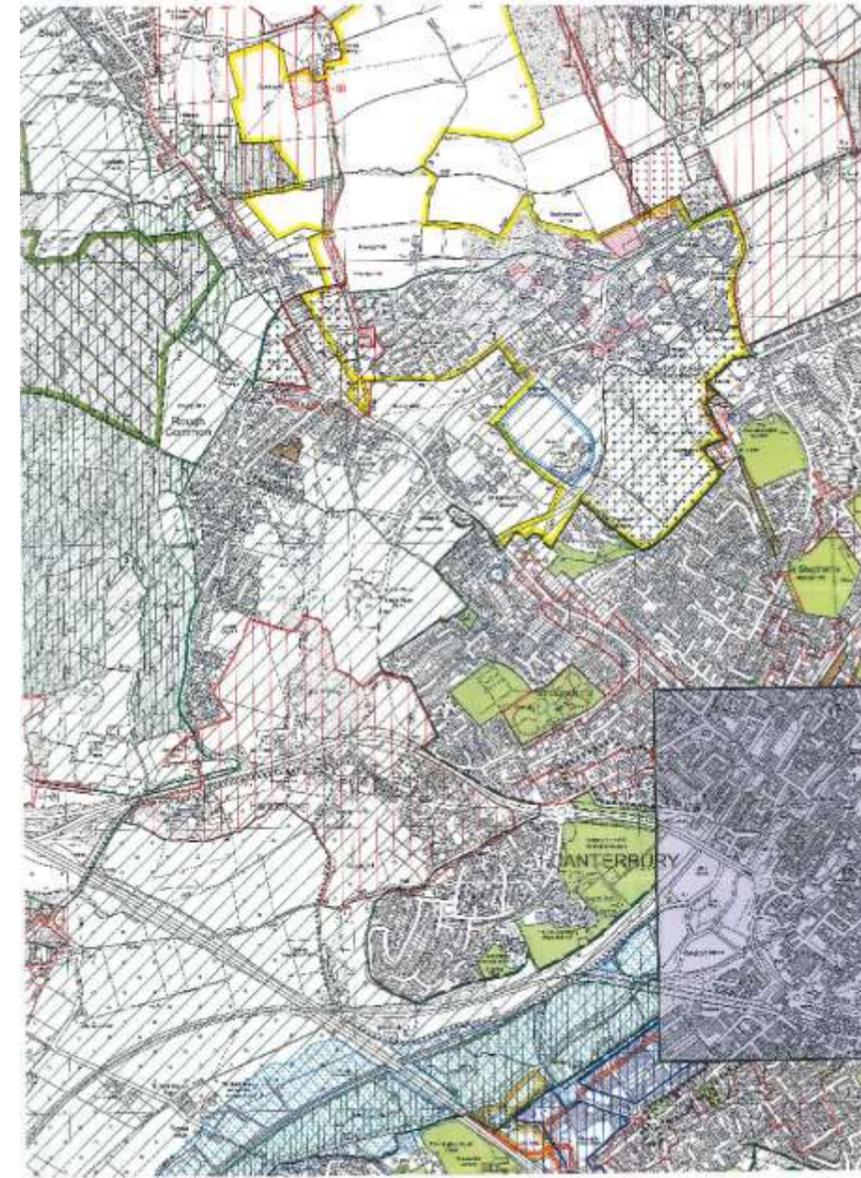
3.11 The **NPPF** - in advising on the **determination of applications** - comments in **Paragraph 196**:

“The planning system is Plan-led. Planning Law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. This Framework is a material consideration in planning decisions.”

- 197 - In assessing and determining development proposals, Local Planning Authorities should apply the presumption in favour of sustainable development.”
- 3.12 **Annex A: Implementation** - advises, in **Paragraph 216**:
“From the day of publication, decision-takers may also give weight to relevant policies in Emerging Plans according to:
- *the stage of preparation of the Emerging Plan (the more advanced the preparation, the greater the weight that may be given);*
 - *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater weight that may be given); and*
 - *the degree of consistency of the relevant policies in the Emerging Plan to the Policies in this Framework (the closer the policies in the Emerging Plan to the Policies in the Framework, the greater the weight that may be given.”*
- 3.13 Given the emerging changes in Local Planning Policy and the Guidance in the NPPF, it could be argued that planning applications for the site should not only be tested against the 2006 Adopted Plan but also the NPPF and, in particular, its emphasis on sustainability, and the effective use of previously developed land and weight should also be given to the Emerging Local Plan.
- 3.14 Amongst the **Core Principles of the National Planning Policy Framework (NPPF)** is encouragement for the effective use of land by reusing land that has been previously developed (brownfield land), provided that is not of high environmental value (**Paragraph 17**).
- 3.15 **Previously developed land** is identified in the Glossary of the NPPF as:
- “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through Development Control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.”*
- 3.16 **Paragraph 49** of the NPPF advises that housing applications should be considered in the context of the presumption of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the Local Planning Authority cannot demonstrate a 5 year supply of deliverable housing sites.
- 3.17 **Paragraph 51** encourages the **residential reuse of empty buildings**, advising that planning applications for change to residential use from commercial buildings should be supported where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.
- 3.18 **Section 6** of the NPPF stresses the importance of providing land for new housing through Local Plans and through the determination of planning applications.
- 3.19 Any application proposals would also need to take into account the advice in the NPPF in terms of design and impact on biodiversity, landscape, highway safety, etc.
- 3.20 As advised above, the policies and proposals of the **Canterbury Local Plan Review Publication Draft 2014** have been subject to Examination and, in line with **Paragraph 216** of the NPPF increasing weight will be given to the Plan in the determination of applications and as the Plan proceeds towards adoption.
- 3.21 Following the Examination in 2015 and 2016, the Inspector's consideration of the Main Modifications and representations and subsequently receipt of the Inspector's Report, the Plan may be adopted in 2017.
- 3.22 One of the principal issues identified by the Inspector during Stage One of the Examination - July 2015 - was housing land supply. The Inspector has not yet commented as to whether the Plan proposal will meet the Objectively Assessed Need nor provide a 5 year land supply.
- 3.23 The Inspector issued his letter of 10th August 2015 - *Main Outcomes of Stage One Hearings*.
- 3.24 The Inspector's main concern related to the appropriate level of Objectively Assessed Housing Need and the likelihood that the Plan, as then drafted, would not have a 5 year housing land supply and thus would not accord with National Policy and would, therefore, be unsound.
- 3.25 The Inspector's Note advised at Paragraph 26 that the OAN for the Plan, up to 2031, should provide for 16,000 dwellings in total and provide a 5 year land supply with a 5% buffer.
- 3.26 In view of this, the Inspector did not progress to Stage Two of the Examination.
- 3.27 In November 2015, the City Council consulted on additional housing sites proposed for inclusion within the Plan.
- 3.28 The City Council forwarded details of these additional sites, the representations received and other documents to the Inspector.
- 3.29 The Local Plan Examination opened again in July and September 2016, with the first issue considered being 5 year housing land supply. The Inspector has not yet commented as to whether the Plan's proposals will meet the Objectively Assessed Need nor provide a 5 year land supply.
- 3.30 As above, the Inspector will be considering representations submitted in respect of the February 2017 Main Modifications consultation. For the Inspector to find that the Plan is 'sound', it must be NPPF compliant.
- 3.31 The Gorsefield site is not allocated for new development in this Draft Local Plan.
- 3.32 Attention is drawn, in particular, to the following Draft Policies - the wording of some of which is already proposed to be revised through the February 2017 Modifications. Other policies may be further revised before the Plan is Adopted.
- 3.33 The Draft Plan contains a number of Policies to be taken into account and against which development proposals will be considered:
- SP1 - sustainable development;
 - SP2 - development requirements;
 - SP4 - location of development;

- HD2 - affordable housing and Proposed Modification;
- HD4 - new dwellings in the countryside;
- HD5 - conversion of rural buildings;
- HD7 - Purpose-Built Student Accommodation;
- HD9 - empty residential property;
- EMP2 - other business uses;
- EMP7 - University of Kent;
- EMP14 - other rural businesses;
- T1 - Transport Strategy;
- T9 - Parking Standards;
- T17 - Transport Assessments and Travel Plans;
- TV2 - new tourism development;
- TV7 - rural tourism;
- TV8 - tourist accommodation and facilities;
- CC4 - Drainage Impact Assessment
- CC11 - Sustainable Drainage;
- CC12 - water quality;
- DBE1 - sustainable design and construction;
- DBE3 - design principles;
- DBE7 - Residential Space Standards;
- DBE8 - inclusive design
- DBE10 - alterations and extensions to buildings;
- DBE12 - Public Open Space;
- HE11 and HE12 - Archaeology;
- LB2 - Areas of High Landscape Value;
- LB4 - Landscape Character;
- LB8 and LB9 - biodiversity;
- LB10 - retention of important trees, hedgerows and woodland;
- OS11 - provision of new Open Space;
- QL1 - provision of social infrastructure/community facilities;
- QL8 - Health and Social Care.

3.34 Regard must also be made to the relevant Supplementary Planning Documents.



Proposals Map to Canterbury Local Plan Review Publication Draft 2014

4. ANALYSIS OF PLANNING POLICY CONTEXT AND OTHER MATERIAL CONSIDERATIONS

- 4.1 The relevant policies of the Adopted Local Plan, the NPPF and the Emerging Canterbury Local Plan Review are set out in Section 3, above.
- 4.2 The Gorsefield site is no longer required by the School.
- 4.3 The Gorsefield site may be suitable for development for a variety of uses, such as student accommodation or Care Home, or other developments, subject to the grant of planning permission.
- 4.4 In considering the development potential of the Gorsefield site, appropriate regard must be paid to the policies of the Adopted and Emerging Local Plans and other material considerations, including the NPPF and the appropriate weight that can be given to Emerging Plans - see Section 3, above.
- 4.5 The NPPF stresses the importance of providing new homes, in particular, through the effective use of previously developed land and buildings.
- 4.6 Although the Emerging Local Plan Inspector has set the Objectively Assessed Need for housing to 2031 through his August 2015 letter at 16,000 units, the Inspector is yet to consider whether the Plan, as a whole, will meet this requirement and whether the Council has an identified 5 year housing land supply with a buffer of 5%.
- 4.7 Although the City Council asserts through its February 2017 Modifications that the District has a 5.34 year housing land supply, this is yet to be tested through the Local Plan Examination and the Inspector's Report.
- 4.8 Paragraph 49 of the NPPF advises that housing applications should be considered in the context of the presumption of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the Local Planning Authority cannot demonstrate a 5 year supply of deliverable housing sites.
- 4.9 Policy H1 of the Adopted Local Plan and Policies HD4 and SP4 of the 2014 Draft Plan set a presumption against development outside the urban boundary.
- 4.10 The Gorsefield site, the whole of the St Edmund's School Campus and the University of Kent Campus all lie outside the urban boundary.
- 4.11 If it is considered that the Council does not have a 5 year land supply with 5% buffer, Policy H1 of the Adopted Local Plan (which places the Gorsefield site outside the confines of the City and thus technically within the countryside), would be considered to be an out-of-date policy in the determination of a planning application.
- 4.12 Even if it is determined that the Council has a 5 year land supply, the NPPF, through Paragraph 17 - encourages the effective use of previously developed land.
- 4.13 It is considered that arguments can be advanced to support the residential reuse or redevelopment of Gorsefield and its immediately adjoining land on the grounds that the building and its immediately adjoining land comprise previously developed land. Reuse for residential would be in accordance with the sustainability and housing elements of the NPPF and the principles of the Emerging Local Plan.

- 4.14 The Proposals Maps to both the Adopted and Emerging Local Plan Review place the Gorsefield site within the Canterbury Area of High Landscape Value.
- 4.15 This designation washes over areas that are already significantly developed including the sites of St Edmund's School, all but the northern part of the University of Kent Campus, the Kent College Campus and Rough Common village.
- 4.16 Policy R7 of the Adopted Local Plan advises that within Areas of High Landscape Value - development proposals which will cause unacceptable harm will not be permitted. Particular consideration will be given to the impact of the proposal on local landscape character and/or role and on its historic setting.
- 4.17 The proposed replacement policy for the Emerging Local Plan - Policy LB2 - seeks protection of local landscape character and historic setting of City and the World Heritage Site. The policy wording is proposed to be modified as follows:

| Reference | Page | Policy/ Paragraph | Main Modification |
|-----------|------|-------------------|---|
| MM 145 | 229 | LB2 | <p><i>Amend policy text</i></p> <p>The following Areas of High Landscape Value are defined on the Proposals Map and Inset Maps:</p> <ul style="list-style-type: none"> a. The North Kent Marshes; b. The North Downs; c. Blean Woods; d. Wantsum Channel; e. Canterbury (the valley of the River Stour around Canterbury). <p>Within these areas, development will be considered in relation to the extent to which its location, scale, design and materials would <u>impact on or</u> protect the local landscape character and enhance the future appearance of the designated landscape and its <u>heritage and</u> nature conservation interest. Development proposals that which run contrary to <u>support the</u> landscape character (including settlement character), or and <u>have no significant</u> impact directly upon historic setting, archaeological or nature conservation interests, where relevant, will not be permitted.</p> <p>Within the Canterbury AHLV, development proposals should have particular regard to the historic setting of the City and the World Heritage Site.</p> |

- 4.18 Significant developments have been permitted for the University within the AHLV.
- 4.19 The Emerging Local Plan also allocates land for 5,150 houses on two Strategic Sites within the existing AHLV which encircles the City. In addition, a site for 28 houses at nearby Rough Common, within the AHLV, is a further allocation.
- 4.20 Parts of Sites 2 and 10 are also in the AHLV - these sites providing a further 1,310 houses.
- 4.21 The AHLV designation does not, therefore, preclude all forms of development - individual proposals will be tested to establish the impact that a particular proposal would have on local landscape character and its heritage and nature conservation interest.
- 4.22 Development proposals that support landscape character (including settlement character) and would have no significant impact upon historic setting, archaeological or nature conservation interests, where relevant, will be permitted.

4.23 At Canterbury, development proposals should also have particular regard to the historic setting of the City and the World Heritage Site.

4.24 The site's potential was considered by the City Council under their **Strategic Housing Land Availability Assessment (SHLAA)** as Site SHLAA/193.

4.25 At the time, the site was described as a grassed area with areas of earth mounds and spoil, being used for storage of materials with a grassed area for recreational use.

4.26 Under the Stage One Assessment, the site was rejected on the grounds that:

"The site is not suitable as it is in the AHLV and outside the existing urban boundary."

4.27 As above, the Emerging Local Plan identifies a number of sites as Site Allocations for new development - these sites are also outside the urban boundary and as the Area of High Landscape Value encircles the City, also involve AHLV land.

4.28 The site was assessed under the Stage Two Assessment - Suitability - and is considered to be in close proximity to:

- bus-stop;
- University Medical Centre;
- Convenience Store on the University Campus;
- Primary School - Blean;
- Secondary School;
- Employment Centre;
- Town Centre;
- Comments were made on the suitability of Giles Lane and its junction with St. Thomas' Hill.
- Archaeological Evaluation and Ecological Surveys would be required.



4.29 The site was assessed as follows:

- **Townscape** - Whilst located outside a settlement, there is existing development surrounding the site - residential and School/University.

- **Landscape** - The loss of the undeveloped playing field would impact on the landscape. The site would represent infill development. The site is within an Area of High Landscape Value.

- **Trees** - There are numerous trees and hedges around the site. A Tree Survey would be required.

4.30 It was noted that a condition on a planning permission requiring landscaping could help to reduce the impact of the development and provide screening.

4.31 The land adjoining the Gorsefield Boarding House, although used informally for recreation, etc. by the school, does not constitute previously developed land as defined in the NPPF.

4.32 Although planning permission was refused in 2000 for the residential development of this land, the planning policy context and the physical context of the Gorsefield site have changed significantly since then and also since the SHLAA Assessment.

4.33 Although the site falls within the Canterbury Area of High Landscape Value, this designation is principally to protect the historic setting of the City.

4.34 Given the now physical separation of the Gorsefield site from the Southern Slopes of the University by the post-2000 construction of the University Innovation Centre and, most recently, by the four-storey Turing College, the Gorsefield site does not now form part of the setting of the City.

4.35 The Gorsefield site is now enclosed by the school and University developments and does not form part of the wider countryside that planning policies seek to protect.

4.36 Given the site's location away from the Southern Slopes and its context, surrounded by existing development, it is considered that development of the Gorsefield site would not be contrary to Emerging AHLV Policy LB2 as development would not impact on or adversely affect the local landscape character nor the historic setting of the City.

4.37 Government Guidance also stresses the importance of a good mix of sites coming forward for development, noting that small sites create particular opportunities for custom-builders and smaller developers. The Site Allocations in the Emerging Local Plan rely heavily on large sites.

4.38 It is also proposed that 10% of sites allocated for residential development in Local Plans should be smaller sites.

