

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 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.

Lee Evans Planning prepared a report, dated April 2017, which advised on the position with the adopted and emerging Canterbury Local Plan at that time.

Since then, the Local Plan Inspector's Report has been received and the Council have now Adopted their New Local Plan which replaces the 2006 Local Plan.

However the new Local Plan is now subject to a legal challenge.

This Updated Report, August 2017, updates the earlier report to reflect the situation with the adoption of the 2017 Local Plan.

In Summary:

- The Gorsefield site is not identified on the Proposals Map to the July 2017 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 residential, 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 Local Plan and other material considerations, including the National Planning Policy Framework (NPPF).
- The NPPF stresses the importance of providing new homes, in particular, through the effective use of previously developed land and buildings.
- The newly Adopted 2017 Local Plan sets out the Objectively Assessed Need for housing for the District up to 2031 at 16,000 units.
- 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.
- **Table H1 – Housing Land Supply** in the New Local Plan advises that the 5 year land supply is 4,941 units – a surplus of 317 units and thus a 5.34 year supply.
- The Local Plan Inspector's view on the 5 year land supply was based on the position at April 2015 and noted at Paragraph 98 of his report that "*sustained progress on implementing the SSA's (Strategic Site Allocations) is likely to be critical to maintaining an on-going 5 year land supply.*"

The reliance on these sites and the tight current assessment is a weakness for the LP'.

- The Local Plan Inspector also required the Council to carry out additional work on housing to see if an early review of the Local Plan is needed
- The Council is currently updating its 5 year land supply information.
- 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 Paragraph 1.49 of the 2017 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 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 site's 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 2017 Adopted Canterbury Local Plan which does not allocate the site for development.
- 1.7 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.
- 1.8 Prospective purchasers should make their own enquiries to satisfy themselves as to the development potential of the site.***
- 1.9 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. THE GORSEFIELD SITE, ITS CONTEXT AND PLANNING HISTORY

The Gorsefield Site

- 2.1 St Edmund's School is located on St. Thomas' Hill, north of Canterbury City, and has been on this site for over 150 years.
- 2.2 It is an Independent School for children aged 3 to 18, with a mix of day pupils and boarders. Currently, there are 560 children on the school roll.
- 2.3 The original school buildings sit on the Southern Slopes of St. Thomas' Hill with views across the City.
- 2.4 Over time, additional classrooms and related facilities and indoor and outdoor sports facilities have expanded to the north and east of the original school buildings.
- 2.5 The University of Kent Campus was established in the 1960's and over the last 50 years there have been significant developments of academic and residential accommodation and sports facilities.
- 2.6 The most recent development abuts the eastern boundary of the School grounds - the four-storey student accommodation and teaching buildings of Turing College.
- 2.7 Gorsefield is a two-storey, red brick, detached property which is located at the northern edge of the St Edmund's School Campus with access from Giles Lane.
- 2.8 Gorsefield has been used for many years for residential accommodation for boarding pupils; the immediately adjoining land has been used as ancillary garden.
- 2.9 The house faces towards the City rather than towards Giles Lane.
- 2.10 The original building has been extended with a two-storey extension on the Giles Lane side.
- 2.11 The site is enclosed by hedgerows.
- 2.12 Pedestrian access is available from Giles Lane and from the Public Footpath which runs along the west boundary. The Boarding House is separated from the remainder of the School Campus by this Public Footpath and the artificial sports pitches.
- 2.13 Gorsefield now requires refurbishment and upgrading but the schools' intention is to provide alternative boarding accommodation within the main school buildings and thus satisfy a safeguarding requirement to have all boarding accommodation in the interior of the site.
- 2.14 Gorsefield and the adjoining land are no longer required by the school.
- 2.15 To the east is an area of land, also abutting Giles Lane, which has not recently been actively used by the school for educational purposes.
- 2.16 The site was, however, used on a temporary basis from 2007 for the accommodation of Cathedral Choristers within a temporary building.
- 2.17 There is a gated entrance to this undeveloped site from Giles Lane. The land is enclosed by trees and hedgerows.



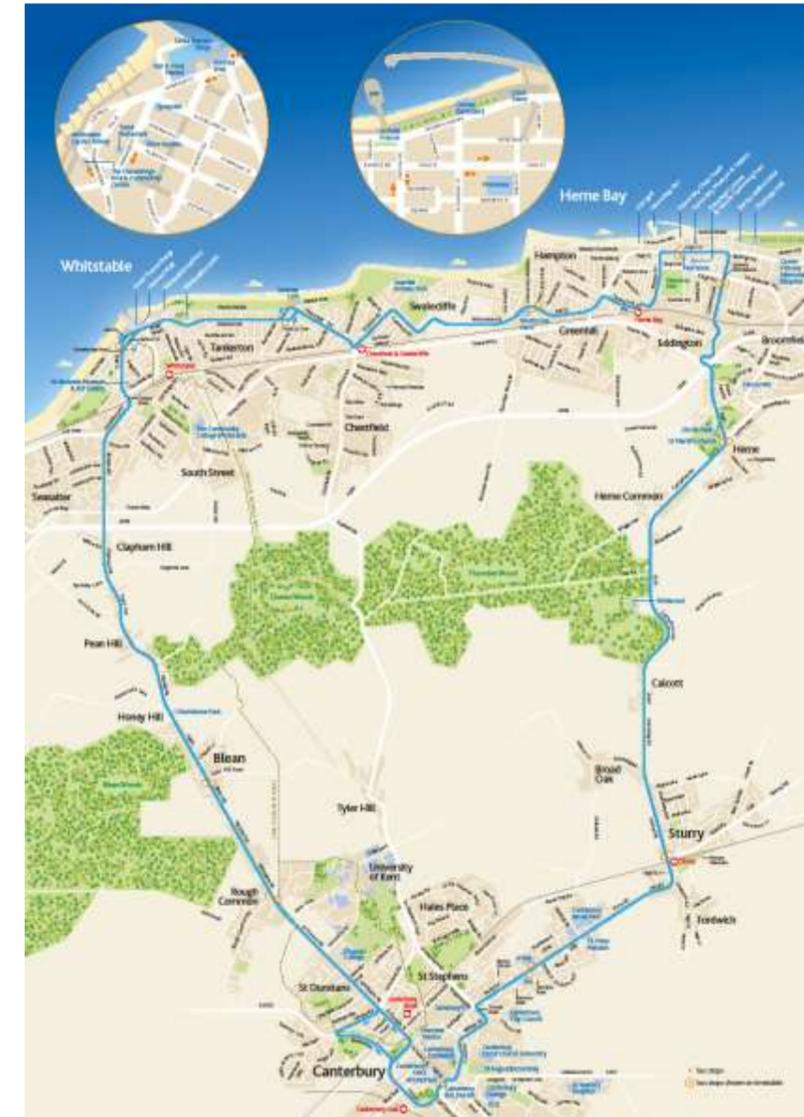
Site Location Plan



- 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).

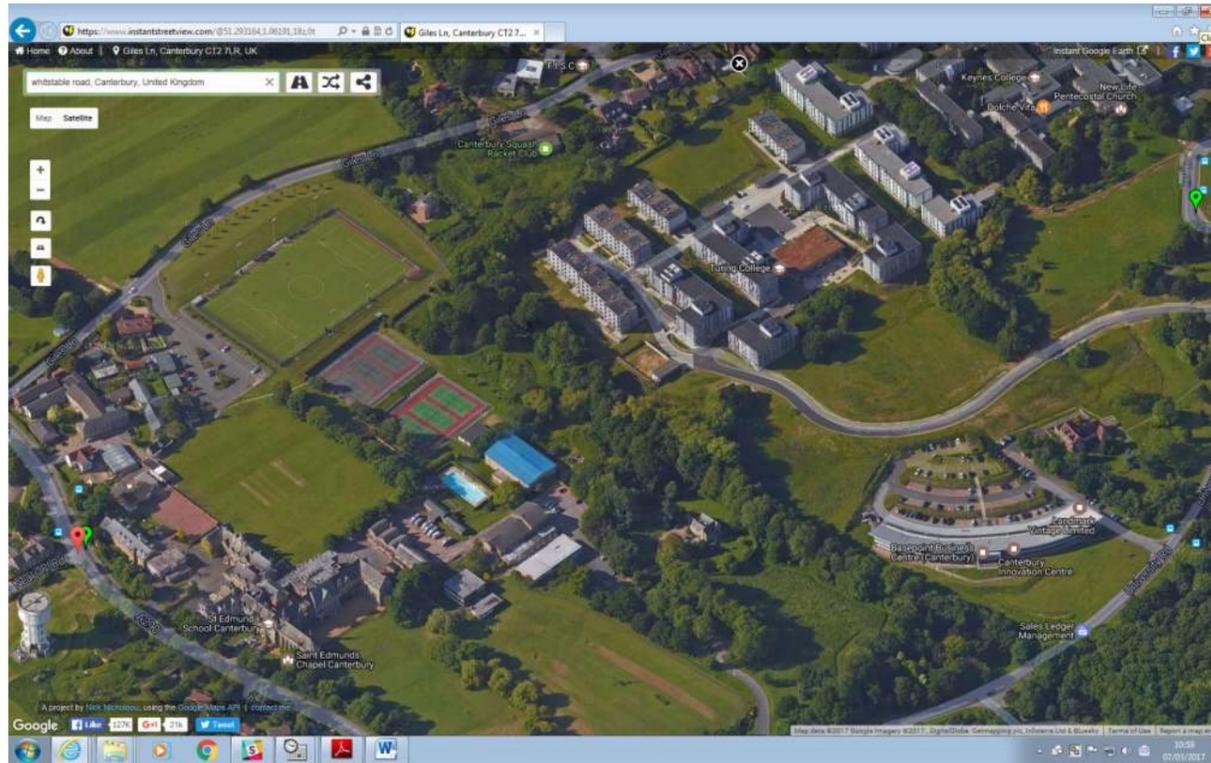
The Site Context

- 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

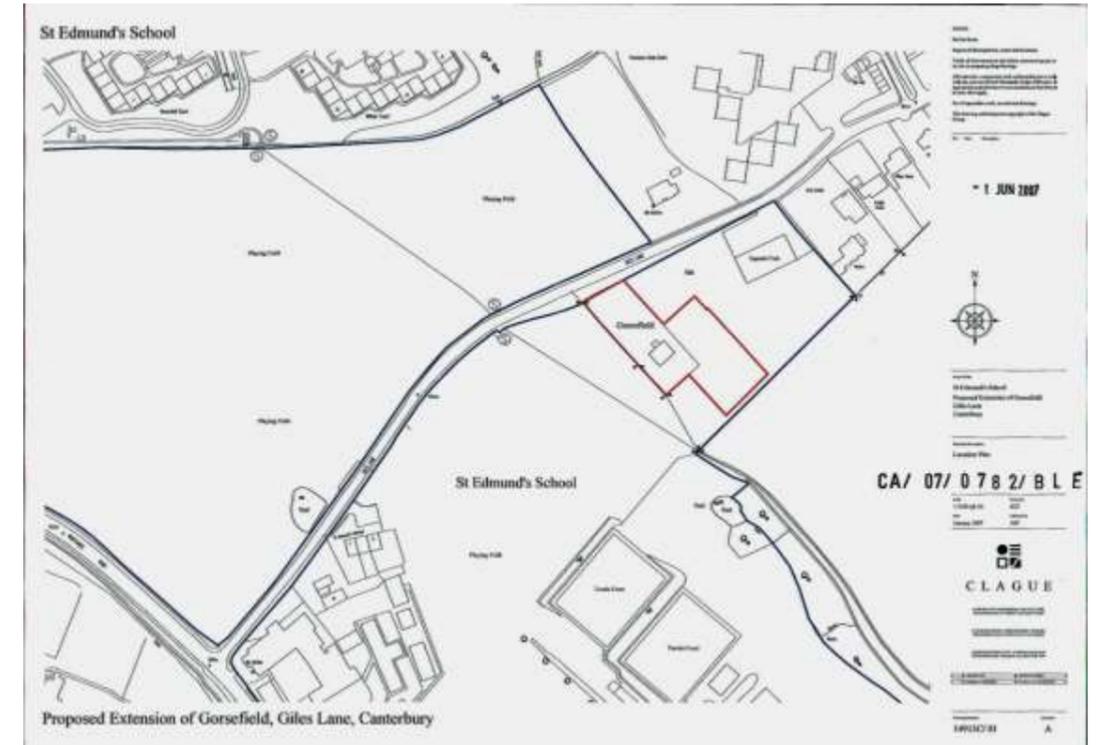




Google Earth Image

Planning History

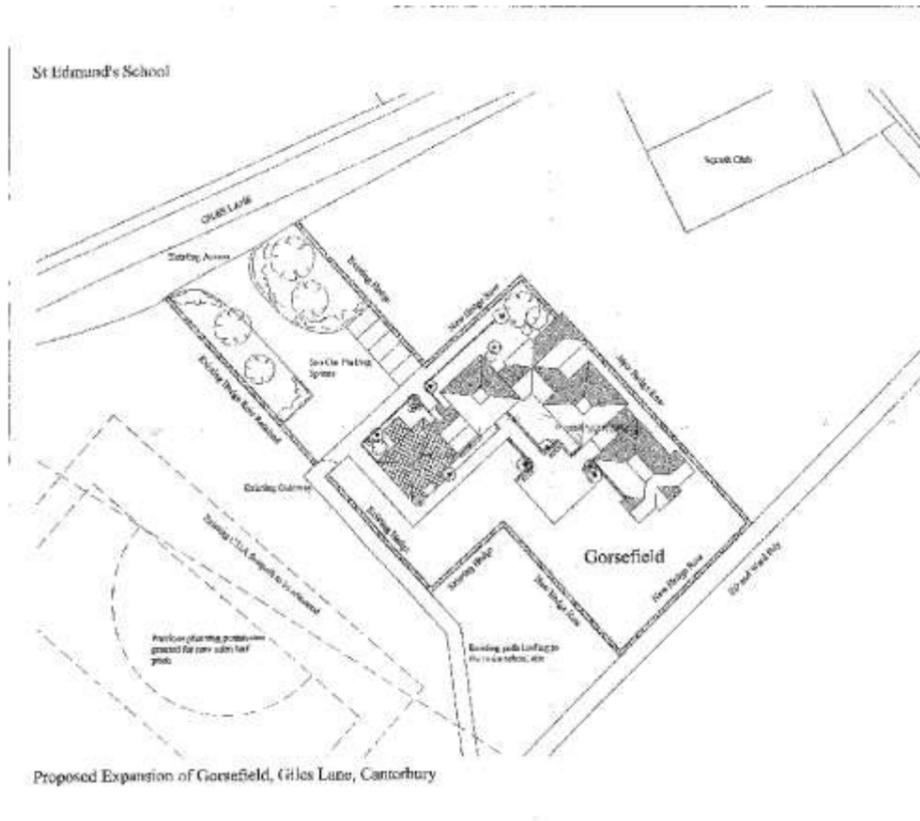
- 2.27 There have been a number of planning applications over the years for further developments at the school.
- 2.28 Planning permission was refused under reference **CA/00/00640** for the development of the Gorsefield land with 14 No. dwellings and the refurbishment of Gorsefield House for dormitory residential use.
- 2.29 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.
- 2.30 Planning permission was granted under reference **CA/02/00826** for an extension to the Girls Boarding Accommodation.
- 2.31 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

- 2.32 In 2010, a new planning permission was granted to replace the 2007 permission (reference **CA/10/00528**).
- 2.33 The extent of the application site with the development scheme are shown above.
- 2.34 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.
- 2.35 The facility would provide residential accommodation for 37 pupils, a Warden and Deputy Warden and also a Common Room and ancillary facilities.
- 2.36 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 2017** which has a timeframe up to 2031.
- 3.2 The Gorsefield site is not identified for any form of development on the Proposals Map to the Adopted Local Plan.
- 3.3 This New Local Plan has been Adopted following Independent Examination by an appointed Inspector.
- 3.4 One of the principal issues identified by the Inspector during Stage One of the Examination - July 2015 - was housing land supply.
- 3.5 The Inspector's Note of August 2015 advised the OAN for the Plan period should provide for 16,000 dwellings in total and provide a 5 year land supply with a 5% buffer.
- 3.6 The Council then consulted on additional housing sites proposed for inclusion within the Plan and the Local Plan Examination continued in July and September 2016.
- 3.7 On 15th June 2017, the Inspector published his Report on the Examination of the Plan.
- 3.8 The Inspector concluded that the Local Plan is 'sound' and 'legally compliant' subject to a number of Main Modifications.
- 3.9 The Council considered the Inspector's Report on 13th July 2017 and agreed the Modifications.
- 3.10 The Plan has now been Adopted with the Modifications required by the Inspector.
- 3.11 The Inspector summarised the **Main Modifications** including:
- increase Objectively Assessed Housing Need to 800 dwellings per annum or 16,000 dwellings over the Plan period;
 - include a commitment to assess the latest sub-national household projections and undertake a partial review of the Plan if necessary.
- 3.12 **Issue 2** – for the Local Plan Examination, as identified by the Inspector - was:
- Whether the Housing Strategy has been positively prepared and whether the overall level of housing provision and its distribution are justified and appropriate.*
- 3.13 The Inspector set out concerns as to whether the Plan is based upon up-to-date data but also recognised the need for adoption of a New Local Plan.
- 3.14 **In Paragraph 75**, the Inspector commented:
- "In the context of all these considerations, the pragmatic and appropriate way forward is for the LP to commit the Council within a fixed timescale to a thorough assessment of the implications of the new projections, the partial review of the Plan if this shows that further housing sites are needed."*
- 3.15 The Inspector then went on to discuss **Land Supply** in **Paragraphs 78 to 105**.

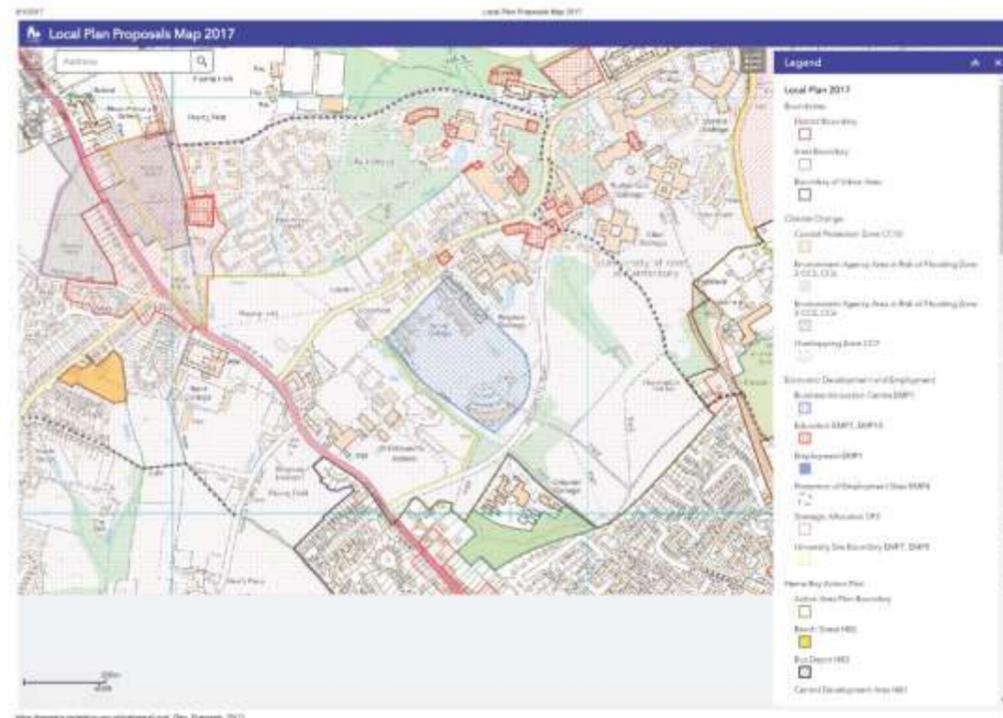
- 3.16 The Inspector referred to the requirements of the NPPF for the identification of a 5 year supply of deliverable housing sites against their requirement.
- 3.17 The Inspector referred to the Council's various assessments of their 5 year land supply.
- 3.18 In **Paragraph 81** the Inspector refers to the Council's evidence at July 2016 and a 5.39 year land supply using the April 2015 base.
- 3.19 The Inspector noted that this would be updated to April 2016, in due course.
- 3.20 In **Paragraph 84**, the Inspector referred to the shortfall in land supply at April 2015 at 1,300 dwellings.
- 3.21 At **Paragraph 85**, the Inspector commented that:
- "In this case, the need for a realistic approach points to the Liverpool Method (spreading the under supply across the whole of the remaining Plan period) as the means of securing the aspiration of addressing the past shortfall, as proposed by the Council."*
- 3.22 In **Paragraph 87**, the Inspector concluded that a 5% buffer is justified.
- 3.23 In terms of the land supply, the Inspector commented in **Paragraph 97** that:
- "The land supply calculation is a snapshot at a particular moment in time. There is a framework obligation on the Council to monitor and update its land supply on an annual basis. Before or shortly after the LP is Adopted, it has indicated that it intends to have rolled forward the supply calculation. In which case, the SSA's are likely to be able to make a more substantial contribution than in the current period (Strategic Site Allocations?)."*
- The changes to Policy SP4 as a result of MM16 will introduce a greater degree of flexibility in determining planning applications on potential windfall sites which will assist the Council in fulfilling its role.*
- 98 - Sustained progress on implementing the SSA's is likely to be critical to maintaining an on-going 5 year supply. The reliance on these sites and the current site assessment is a weakness for the LP. However, on the evidence before me, tested at the Hearings and based on parties involved in delivery doing as they intend, there is a reasonable prospect that there would be a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against the requirements. For clarity and, therefore, effectiveness, MM26 is necessary to set out the current land supply (5.34 years) has been calculated and the assumptions on which it is based."*
- 3.24 In terms of the **Distribution of Housing**, the Inspector comments in **Paragraph 101** that the strategic approach to the location of development is set out in **Policy SP4**, with the urban areas being the principal focus.
- 3.25 In **Paragraph 102**, the Inspector notes that the Framework encourages the reuse of previously developed land and that the LP itself has sought to achieve this aim, linking it to what is described as a sequential approach to the location of development, with the focus on the Urban Centres.

3.26 The Inspector also notes that, given the amount of new housing needed and the rural character of much of the Plan Area, it is unsurprising that most of the new allocations are on greenfield sites.

3.27 The Inspector also commented that:

"For windfall sites, Policy SP4 emphasises the main urban areas as the principal focus for development where opportunities to reuse land are likely to be greater."

3.28 The Inspector also stated that – given the reliance on the Strategic Site Allocations – it is important that Policy SP4 provides an appropriate degree of flexibility in dealing with windfall sites.



Proposals Map to Adopted Local Plan 2017

3.29 In determining planning applications regard must also be paid to the **National Planning Policy Framework (NPPF) (2012)** and also the **National Planning Practice Guidance (NPPG) (2014)**.

3.30 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."*

3.31 Planning applications for the site should not only be tested against the 2017 Adopted Plan but also the NPPF and, in particular, its emphasis on sustainability, and the effective use of previously developed land.

3.32 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**).

3.33 **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."

3.34 **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.

3.35 **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.

3.36 **Section 6** of the NPPF stresses the importance of providing land for new housing through Local Plans and through the determination of planning applications.

3.37 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.

3.38 The Gorsefield site lies outside the urban boundary and is not allocated for new development in the 2017 Adopted Local Plan.

3.39 Attention is drawn, in particular, to the following Policies which are 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;
- 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;
- CC2 - reducing carbon emissions from new development;
- CC4 - Flood Risk
- CC11 - Sustainable Drainage Systems;
- CC12 - water quality;
- DBE1 - sustainable design and construction;
- DBE3 - principles of design;
- DBE4 - Residential Space Standards;
- DBE5 - inclusive design
- DBE6 - alterations and extensions to buildings;
- DBE8 - Public Open Space;
- HE11 and HE12 - Archaeology;
- LB2 - Areas of High Landscape Value;
- LB4 - Landscape Character Areas;
- LB8 and LB9 - biodiversity;
- LB10 - trees, hedgerows and woodland;
- OS11 - Open Space provision;
- QL1 - provision of social infrastructure/community facilities;
- QL8 - Health and Social Care facilities.

follow a Sequential Approach to the sustainable location of new development, subject to other planning factors."

3.42 **Paragraph 2.48** entitled **Housing outside Urban Areas** comments:

"Outside urban areas, housing provision is restrained by the NPPF"

3.43 Regard must also be made to the relevant **Supplementary Planning Documents** prepared by Canterbury City Council.

3.40 **Policy SP4 - Strategic Approach to Location of Development** - states:

The urban areas of Canterbury, Herne Bay and Whitstable will continue to be the principal focus for development, with a particular focus at Canterbury, together with development at the Rural Service Centres and Local Centres.

In addition to the development allocations set out in this Plan:

- i) *in the urban areas of Canterbury, Herne Bay and Whitstable, new housing development will be supported on suitable sites, where this 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."*

3.41 Accompanying **Paragraph 1.9** comments:

"Thus, in this Plan, the allocation of land for new development in the District seeks to make the best use of previously developed land and buildings, where available, and to

4. ANALYSIS OF PLANNING POLICY CONTEXT AND OTHER MATERIAL CONSIDERATIONS

- 4.1 The relevant policies of the 2017 Adopted Local Plan and the NPPF 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 residential, 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 Local Plan and other material considerations, including the NPPF.
- 4.5 The Gorsefield site, the whole of the St Edmund's School Campus and the University of Kent Campus all lie outside the urban boundary. The Gorsefield site is not allocated for any form of development in the adopted Local Plan.
- 4.6 The NPPF stresses the importance of providing new homes, in particular, through the effective use of previously developed land and buildings.
- 4.7 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.
- 4.8 As set out in Section 3 above – although the Local Plan Inspector accepted that the Council had a 5 year land supply (using the Liverpool method to deal with the shortfall) – the data for this calculation dated from 2015.
- 4.9 The Inspector expressed concerns with respect to this data and also that the rate of delivery may be slow given the reliance upon Strategic Sites – noting this as a weakness of the plan.
- 4.10 The Inspector required the Council to update the land supply position and consider whether an early review of the plan is required.
- 4.11 In Paragraphs 62 to 68 of the “**Gladman/Blean**” **appeal decision** (ref CA/15/02523/OUT - July 2017) the Inspector commented that there was some doubt over the Council’s 5 year supply calculations.
- 4.12 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 Local Plan.
- 4.13 The Proposals Maps to both the Adopted and Emerging Local Plan Review place the Gorsefield site within the **Canterbury Area of High Landscape Value**.
- 4.14 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.

4.15 **Policy LB2** of the 2017 Adopted Local Plan seeks protection of local landscape character and historic setting of City and the World Heritage Site.

"The following Areas of High Landscape Value are defined on the Proposals Map and Inset Maps:

- 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).*

Within these areas, development will be considered in relation to the extent to which its location, scale, design and materials would impact on or protect the local landscape character and enhance the future appearance of the designated landscape and its heritage and nature conservation interest. Development proposals that support the landscape character (including settlement character), and have no significant impact upon historic setting, archaeological or nature conservation interests, where relevant, will be permitted.

Within the Canterbury AHLV, development proposals should have particular regard to the historic setting of the City and the World Heritage Site."

4.16 Significant developments have been permitted for the University within the AHLV.

4.17 The 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.

4.18 Parts of Sites 2 and 10 are also in the AHLV - these sites providing a further 1,310 houses.

4.19 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.

4.20 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.

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

4.22 The site's potential was considered by the City Council under their **Strategic Housing Land Availability Assessment (SHLAA)** - an assessment which informed the preparation of the 2017 Adopted Local Plan - as Site SHLAA/193.

4.23 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.

4.24 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."

4.25 As above, the 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.

4.26 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.



4.27 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.

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

4.29 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.

4.30 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.

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

4.32 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.

4.33 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.

4.34 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 Policy LB2 as development would not impact on or adversely affect the local landscape character nor the historic setting of the City.

4.35 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 Local Plan rely heavily on large sites.

4.36 Government Guidance also proposes that 10% of sites allocated for residential development in Local Plans should be smaller sites.

