

**Draft Canterbury District Local Plan 2040** Regulation 18 Consultation 2024

# NATURAL ENVIRONMENT AND OPEN SPACE TOPIC PAPER

(FEBRUARY 2024)

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## 1. Introduction

- 1.1. This topic paper sets out the background to the council's approach to the protection, enhancement and provision of the natural environment in the development of the draft Local Plan.
- 1.2. The natural environment policies in the draft Local Plan have been prepared in line with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). They have also been informed by a number of evidence base documents, as set out in this document.
- 1.3. The Natural Environment and Open Space Topic Paper sets out the following:
  - Chapter 2 an overview of the three **Call for Sites** which have been undertaken to inform the draft Local Plan. This includes the natural environment and renewable energy call for sites which ran from February to March in 2022.
  - Chapter 3 a review of the existing Green Gaps following the Green Gaps & Local Green Spaces Review (2021), the Draft District vision and Local Plan options consultation in 2021, and the Regulation 18 Draft Local Plan consultation (2022), as well as the assessment of eleven study areas for their suitability as new green gaps. This included a revised methodology for the assessment of new green gaps which considers a spatial and development based assessment alongside the technical assessments previously used.
  - Chapter 4 a review of the existing Local Green Spaces within the district following the Green Gaps & Local Green Spaces Review (2021) as well as the assessment of other potential Local Green Spaces. However, no new Local Green Spaces are proposed.
  - Chapter 5 the assessment of the existing 192 **Protected Open Spaces**, and an explanation about the protective Green Infrastructure Space designation.
  - Chapter 6 draft site allocations and environmental protections have been reviewed as part of the Habitat Regulation Assessment to inform the Regulation 18 draft Local Plan (2024). Consideration has been given to sites that have the potential to be Functionally Linked Land with a SPA, SAC and/or RAMSAR site, as well as commentary on the three allocations which may contain ancient woodland.

- Chapter 7 a review was undertaken to identify and map the Blean Woodland Complex to support the implementation of Policy DS23 - The Blean Woodland Complex.
- Chapter 8 an outline of the district's need for Wetlands as part of the Nutrient
  Mitigation Strategy, and an overview of the 'Land to the south of Sturry Road',
  allocated under Policy C20 in the Regulation 18 draft Local Plan (2024), as wetland
  alongside Policy DS17 Habitats of international importance, which safeguards a
  further nine parcels of land.
- Chapter 10 covers how the draft Local Plan will be **supporting biodiversity recovery and publicly accessible open space,** and provides further explanation to support the implementation of 20% biodiversity net gain and 20% tree cover.
- 1.4. Due to the revisions made to this topic paper in light of the Regulation 18 draft Local Plan consultation (2022), new evidence and updated evidence, this version of the Natural Environment and Open Space Topic Paper (2024) has been published to replace the previous 2022 version.

## 2. Call for Sites submissions

- 2.1. Since 2020, three call for sites have been undertaken to inform the draft Local Plan.
- 2.2. The first call for sites ran from 7 February to 30 June 2020. A second call for sites ran from 12 May 2021 to 9 July 2021. Sites could be submitted for a variety of uses including:
  - housing (including affordable housing and specialist accommodation for students)
  - a variety of accommodation for older persons (including retirement properties/villages, care homes, extra care, sheltered housing)
  - a variety of accommodation for disabled and specialist needs housing
  - self and custom-build housing (including community led housing and co-housing groups)
  - gypsy, traveller and travelling showcasing pitches (including transit and stopping places)
  - economic development (including offices, storage, distribution centres, industrial uses, leisure, retail and tourism uses)
  - community facilities and uses
  - land for biodiversity habitats, open space and Local Green Spaces
- 2.3. A targeted natural environment and renewable energy call for sites ran from 9 February 2022 to 11 March 2022 to identify further potential sites to help the district meet its climate change and ecological goals.
- 2.4. To maximise engagement and awareness of the call for sites, the council notified statutory bodies, stakeholders, those listed on the Local Plan contact database and placed details on social media channels. Details were also published on the council's website and newsroom.
- 2.5. Sites submitted for development (such as housing, employment and commercial) were assessed in the Strategic Land Availability Assessment (2022, 2023) and Sustainability Appraisal of Strategic Land Availability Assessment (2023). Sites proposed for allocation within the draft Local Plan are discussed in the Development Topic Paper (2024).
- 2.6. Sites submitted for renewable energy schemes are discussed in the Climate Change Topic Paper (2024).
- 2.7. This document reviews the sites submitted for natural environment purposes; such as for green gaps, local green spaces, green infrastructure and biodiversity net gain.

### Methodology

- 2.8. Across the sites there were various different proposals submitted. To ensure the correct assessment was undertaken it was essential to understand the applicant's proposal and the current status of the site.
- 2.9. The methodology for assessing the submissions is set out below:
  - **Step 1** What is the status of the site?
    - Does it have existing planning permission? Will this contradict or inhibit the site's capacity to endure past the Local Plan?
    - Has it been submitted through the call for sites for a different purpose? If so, what was the outcome of the assessment?
    - Is it included in the Playing Pitch Strategy or the draft Open Space Strategy?
  - Step 2 Identify what the next steps will be.
    - Has it been assessed in another part of this document (i.e. was it proposed as a Local Green Space, Green Gap, Protected Open Space under 2017 Local Plan Policy OS9 or for wetlands?). If so, what was the outcome of the assessment?
    - Is it already included within the draft Local Plan? If so, under which policy?
    - Ones it require further assessment?
- 2.10. Sites which are assessed elsewhere in this document or already protected and included within the draft Local Plan will stop here as there is no need to further assess them.
- 2.11. The remaining sites will progress onto the next steps:
  - **Step 3** Site visits:
    - Undertaken in 2022, each site was visited and key features such as topography, notable views into and from the site, trees and landscape features and notable built form were recorded.
  - **Step 4** a detailed desk-based assessment, using information from the site visits, was undertaken. Consideration was given to:
    - Brownfield, greenfield or mixed;
    - Site area: is the site large enough to provide strategic district-wide biodiversity net gain benefits?
    - International natural / biodiversity designations: whether the site is covered by or in close proximity to international designations such as Special Protection Area (SPA), Special Area of Conservation (SAC) or RAMSAR;

- National landscape / environmental / biodiversity designations: whether the site is covered by or in close proximity to national designations such as Sites of Special Scientific Interest (SSSI), National Nature Reserve (NNR), Marine Conservation Zones (MCZ), Kent Downs Area of Outstanding Natural Beauty (AONB), Flood Zone 2 or 3;
- Local landscape / environmental / biodiversity designations: whether the site
  is covered by or in close proximity to local designations such as Local Nature
  Reserve (LNR), Local Wildlife Site (LWS), Regionally Important Geological /
  Geomorphological Sites (RIGS) or Local Green Space (LGS);
- TPOs, ancient woodland, priority habitat on the site;
- Best and Most Versatile Agricultural land: using the national data is the land classified as best and most versatile agricultural land;
- Townscape: the appearance of the nearby built environment;
- Landscape: the landscape character and appearance of an area of land;
- Topography: the form of the land surface;
- Views: are there long distance views? Are there features limiting views?
- Public access: is there public access to the entire site, public rights of way or is it private land?
- Habitat connectivity: does the land act as a green ecological corridor between key habitats such as priority habitats or open space?
- Landscape buffer: does the site act as a landscape buffer for example adjacent to a railway line or busy road?
- Is it available? Did the land owner submit the site or agree in writing to the proposed scheme?
- 2.12. Based on the assessment, a recommendation is then made on how the site should be considered in the draft Local Plan.

## **Assessment and recommendations**

- 2.13. In total, 29 sites were submitted for consideration. These are shown on the <u>Call for Sites submission map</u>.
- 2.14. Table 2.1 covers steps 1 and 2 of the methodology and provides an overview of what the next steps were for each site.

Table 2.1: Steps 1 and 2 of the methodology

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
SLAA008	Sports Field, Rabbit Hole, Barham	Two football pitches with changing pavilion and car parking facilities	Proposed use has planning permission. Site is protected through the Playing Pitch Strategy.	Site is protected in the draft Local Plan under <i>Policy DS24 - Publicly accessible open space and sports.</i>
SLAA023	The Two Fields in the parish of Westbere	Continued protection as Green Gap	Green Gap between Sturry and Westbere reviewed under Green Gaps & Local Green Spaces Review (2021) and consulted on through the <i>Draft district vision and Local Plan options</i> consultation in 2021.	Site is reviewed in Chapter 3 of this document.  Green gap proposed to be retained with existing building to the east removed inline with the previous consultation.
SLAA029	Black Griffin Park	Public open space	Brownfield site, decommissioning and disposal were approved in 2016 and 2017. Site has been decommissioned and is no longer in use. Therefore it is	No further assessment.  No designation proposed as brownfield site and not accessible open space.

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
			not accessible open space so not included within the draft Open Space Strategy.	
SLAA059	The Paddock - PrOS	Public open space	Also submitted under SLAA075 for residential development and assessed as not suitable.  Included under 2017 Local Plan Policy OS9.	Site is reviewed in Chapter 5 of this document, under site reference 146.  This site submission is recommended to be Green Infrastructure Space, identified on the draft policies map and draft Local Plan <i>Policy DS19 - Habitats, landscapes and sites of local importance</i> .
SLAA121	Upper Bridge Street Roundabout and adjacent small green space	Mini forest (green space)	Small mostly green space.	Requires further assessment.
SLAA139	Wincheap Meadow	Local Nature Reserve or Local Green Space	Local Nature Reserve status is being reviewed separately.	Site is reviewed in Chapter 4 of this document.  Site is not recommended as a Local Green Space as uncertainties about its future and ability to endure past the draft Local Plan.
SLAA157	Great Stour River	Fruit Routes and Orchard City (green space)	Accessible open space included in the draft Open Space	Site is protected in the draft Local Plan under <i>Policy DS24 - Publicly accessible</i>

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
			Strategy	open space and sports.
				Actions for the site should be considered as part of the Open Space Strategy Action Plan.
SLAA194	Old Park Training Area	Remain undeveloped	Submitted under SLAA144 for residential development and assessed as not suitable.	No further assessment as the site is outside the Canterbury Urban Area and not being proposed for allocation.
			Submitted under SLAA225 as open space.	
SLAA197	Maypole Airfield	Remain undeveloped	Submitted under SLAA024 for residential development and assessed as not suitable.	No further assessment as the site is in the open countryside and not being proposed for allocation.
			Submitted under SLAA031 for residential development and assessed as not suitable.	
			Submitted under SLAA254 for residential development and assessed as not suitable.	
SLAA212	Land off Well Lane	Remain undeveloped	Submitted under SLAA165 for residential development and assessed as not suitable.	No further assessment as the site is in the open countryside and not being proposed for allocation.

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
			Submitted under SLAA250 for residential development and assessed as not suitable.	
SLAA225	Old Park Training Area	Open space (amenity) and protect the biodiversity and woodland	Canterbury Golf Course is protected through the Playing Pitch Strategy.  Parts of the site are accessible open space and protected through the draft Open Space Strategy.  Part of the site is Chequers Wood & Old Park SSSI.  Submitted under SLAA144 for residential development and assessed as not suitable.  Submitted under SLAA194 to remain undeveloped.	Majority of the site is protected in the draft Local Plan under Policy DS24 - Publicly accessible open space and sports or Policy DS18 - Habitats and landscapes of national importance.  Northern parcel near Fordwich is assessed under Chapter 6. It is proposed to be allocated for the delivery of a strategic wetland as part of the Canterbury Nutrient Mitigation Strategy under Policy C20- Land to the south of Sturry Road.
SLAA232	Southern slopes of University of Kent	Open space	Within the University of Kent campus boundary.  Not included within the draft	Site is included within the Open Space Strategy and protected in the draft Local Plan under <i>Policy DS24 - Publicly</i> accessible open space and sports.

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
			Open Space Strategy.	
SLAA271	Patrixbourne Road recreation ground and field to the east between the recreation ground and the A2.	Open space	Part of the southern area of the site is accessible open space and protected through the draft Open Space Strategy.	Part of the site is protected in the draft Local Plan under <i>Policy DS24 - Publicly accessible open space and sports.</i> The northern area of the site requires further assessment.
SLAA276	Site of the former Bridge House, Tyler Hill	Improve site as nature reserve	Mostly covered by trees.	Requires further assessment.
SLAA278	Land at Shalmsford Farm	Wetlands	Agricultural land with water features.	Site is reviewed in Chapter 6 of this document.
				Safeguarded as wetland on the draft policies map and in the draft Local Plan under <i>Policy DS17 - Habitats of international importance</i> .
SLAA279	Garrington Marshes	Biodiversity net gain site	Green area including the Little Stour.	Requires further assessment.
SLAA281	University of Kent - Surplus Land - Sites BCD and EF	Open space, biodiversity net gain and renewable energy to support their	Submitted under SLAA158 <sup>1</sup> for residential development and assessed as not suitable.	Site is allocated in the draft Local Plan as a New Rural Settlement under Policy C12 - Land north of the University of

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<sup>&</sup>lt;sup>1</sup> Which has been split into 6 parcels: SLAA158A (withdrawn), SLAA158B, SLAA158C, SLAA158D, SLAA158E and SLAA158F

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
		proposed development. Possible strategic provision if excess provided.	Submitted under SLAA319 for mixed-use development and assessed as suitable.	Kent.  See the Climate Change Topic Paper for assessment of proposed renewable energy use.
SLAA285	Land at Canterbury North substations	Biodiversity net gain site and / or renewable energy	Excluding the hard surface of the substation, the remainder of the site is Great Stour, Ashford to Fordwich Local Wildlife Site, and should have a high existing biodiversity limiting possible gains.	Site is protected in the draft Local Plan under <i>Policy DS19 - Habitats, landscapes and sites of local importance.</i> See the Climate Change Topic Paper for assessment of proposed renewable energy use.
SLAA286	The Protected Open Spaces along the Old Thanet Way	Protected open space	Included under 2017 Local Plan Policy OS9.	Site is reviewed in Chapter 5 of this document, under site references 146, 164, 181, 186 and 187.  Parcel 164 and 186 are within the draft Open Space Strategy, and 187 is within the Playing Pitch Strategy. All three are within the draft Local Plan under <i>Policy DS24 - Publicly accessible open space and sports.</i> Parcel 181 is recommended to be Green Infrastructure Space, identified

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
				on the draft policies map and draft Local Plan Policy DS19 - Habitats, landscapes and sites of local importance.
				Parcel 146 is split with some parts under the draft Open Space Strategy and <i>Policy DS24 - Publicly accessible open space and sports</i> in the draft Local Plan. Part of the site is recommended to be Green Infrastructure Space, identified on the draft policies map and draft Local Plan <i>Policy DS19 - Habitats, landscapes and sites of local importance.</i>
SLAA289	Curtis Wood Park	Protection and enhancement of natural environment site and/or renewable energy.	Accessible open space included in the draft Open Space Strategy	Site is protected in the draft Local Plan under <i>Policy DS24 - Publicly accessible open space and sports.</i> Actions for the site should be considered as part of the draft Open Space Strategy Action Plan.  See the Climate Change Topic Paper for assessment of proposed renewable energy use.

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
SLAA290	Cherry Orchard Playing Field	Open space with leisure / sports facilities and/or renewable energy.	The playing pitch is protected through the Playing Pitch Strategy and the accessible open space is included in the draft Open Space Strategy	Site is protected in the draft Local Plan under <i>Policy DS24 - Publicly accessible open space and sports.</i> Actions for the site should be considered as part of the draft Open Space Strategy Action Plan.  See the Climate Change Topic Paper for assessment of proposed renewable energy use.
SLAA291	Strode Park	Protection of the site and/or renewable energy	Large building and an area covered by trees.	Requires further assessment  See the Climate Change Topic Paper for assessment of proposed renewable energy use.
SLAA292	1. Herne Junior 2.Infant Schools	Biodiversity net gain site and/or renewable energy.	The playing pitches are protected through the Playing Pitch Strategy.	Part of the site is protected in the draft Local Plan under <i>Policy DS24 - Publicly</i> accessible open space and sports.  The remainder of the site requires further assessment  See the Climate Change Topic Paper for assessment of proposed renewable energy use.

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
SLAA293	Herne Bay Cemetery	Biodiversity net gain site	Accessible open space included in the draft Open Space Strategy	Site is protected in the draft Local Plan under <i>Policy DS24 - Publicly accessible open space and sports.</i>
				Actions for the site should be considered as part of the draft Open Space Strategy Action Plan.
SLAA295	Broomfield Orchard	Protection and enhancements of natural environment site	Green space with areas of orchard.	Requires further assessment
SLAA296	Broomfield Pond	Protection and enhancements of natural environment site	Accessible open space included in the draft Open Space Strategy	Site is protected in the draft Local Plan under <i>Policy DS24 - Publicly accessible open space and sports.</i>
				Actions for the site should be considered as part of the draft Open Space Strategy Action Plan.
SLAA297	Broomfield Community Park	Biodiversity net gain site and/or renewable energy.	Majority of the site is accessible open space included in the draft Open Space Strategy.	Majority of the site is protected in the draft Local Plan under <i>Policy DS24</i> - <i>Publicly accessible open space and sports.</i>
				Actions for the site should be considered as part of the draft Open Space Strategy Action Plan.

Site reference	Site name	Applicants proposed use	Sites status	Next Steps
				Parcel within the north of the site requires further assessment  See the Climate Change Topic Paper for assessment of proposed renewable energy use.
SLAA298	Land either side of Albion Lane junction with Herne St	Biodiversity net gain site	Two small parcels: one grassland and the other contains trees.	Requires further assessment.
SLAA299	Gravel Castle Vineyard	Viticulture	Submitted under SLAA258 for commercial development. The information submitted under this site was attached to SLAA258 and assessed there as it is not a natural environment site.	See SLAA258 in Development Topic Paper.

- 2.15. A total of nine sites were identified for continuation onto Steps 3 and 4. The detailed assessment of sites is included in **Appendix B**.
- 2.16. The final recommendations for these nine sites are set out in Table 2.2.

Table 2.2: Recommendations for the sites which required further assessment (Steps 3 and 4)

Site reference	Site name	Recommendation
SLAA121	Upper Bridge Street Roundabout and adjacent small green space	No designation is proposed. Site is too small to provide strategic biodiversity net gain and it is not available.
SLAA271 <sup>2</sup>	Patrixbourne Road recreation ground and field to the east between the recreation ground and the A2.	No designation is proposed. Site is best and most versatile agricultural land (Grade 1 and 3), does not meet the definition of any of the open space typologies and it is not available.
SLAA276	Site of the former Bridge House, Tyler Hill	No designation is proposed. Site is too small to provide strategic biodiversity net gain and it is not available.
SLAA279	Garrington Marshes	No additional designation is proposed. Site is best and most versatile agricultural land (Grade 2 and 3) so is not currently preferred as a strategic biodiversity net gain site. However, further consideration may be given through the production of Local Nature Recovery Strategies in the future.
SLAA291	Strode Park	No additional designation is proposed. Site currently in use as a care facility and the remainder of the site is proposed to be protected under <i>Policy DS18 - Habitats and landscapes of national importance</i> as it is priority habitat.
SLAA292	1. Herne Junior 2.Infant Schools	No designation is proposed. Site currently in use as schools and associated playing fields so could not offer strategic biodiversity net gain and it is not available.
SLAA295	Broomfield Orchard	No designation is proposed. Site is best and most versatile agricultural land (Grade 2) and it is not available.
SLAA297³	Broomfield Community Park	No designation is proposed. Site is best and most versatile agricultural land (Grade 2) and it is not available.

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<sup>&</sup>lt;sup>2</sup> Step 3 and 4 of the assessment was only undertaken on the northern parcel which is not designated as open space in the draft Open Space Strategy and draft Local Plan

<sup>&</sup>lt;sup>3</sup> Step 3 and 4 of the assessment was only undertaken on the northern parcel which is not designated as open space in the draft Open Space Strategy and draft Local Plan

Site reference	Site name	Recommendation
SLAA298	Land either side of Albion Lane junction with Herne St	No designation is proposed. Site is too small to provide strategic biodiversity net gain and it is not available.

## 3. Green Gaps

- 3.1. The green gap policies were originally formulated in 2002 following 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. The council remains concerned that this gradual coalescence between an urban area and adjacent settlements, or between rural service centres and local service centres, not only harms the character of the open countryside, but can also have an adverse and irreversible impact on the setting and special character of our settlements. These are critical protections designed to outlast any individual local plan. Therefore, it is considered important to maintain the green gaps.
- 3.2. Green Gaps & Local Green Spaces Review (2021) assessed the existing green gaps, and where appropriate, offered recommendations to the boundaries.
- 3.3. These recommendations were then part of the *Draft district vision and Local Plan options* consultation in 2021.
- 3.4. The council then undertook a Draft Local Plan Regulation 18 Consultation in October 2022 which invited further comments on the council's existing and proposed green gaps.
- 3.5. The following sections outline the council's assessment of both existing and potential new green gaps, which has informed the draft Canterbury District Local Plan (2040) consultation expected to take place between 11 March and 3 June 2024.

# **Green Gaps within the adopted Canterbury District Local Plan 2017**

#### **Green Gap between Sturry and Westbere**

- 3.6. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on the Green Gap between Sturry and Westbere, the majority agreed with the preferred option of: Option NE5D (preferred option) keep the green gap with suggested boundary changes to exclude a building to the east.
- 3.7. Through the Regulation 18 draft Local Plan consultation (2022), no comments were received regarding the 'Green Gap between Sturry and Westbere' and so no amendments have been made to the green gap following the 2022 consultation.

3.8. Due to this, no further boundary amendments have been made. The Green Gap is included on the draft policies map, excluding the building to the east in line with the preferred option in the previous consultation, and under *Policy DS19 - Habitats, landscapes and sites of local importance* within the draft Canterbury District Local Plan (2024).

### **Green Gap between Sturry and Hersden**

- 3.9. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on the Green Gap between Sturry and Hersden, the majority agreed with the preferred option of: Option NE5F (preferred option) keep the green gap with suggested boundary changes around the garage.
- 3.10. Having reviewed and created a settlement boundary around Sturry, the draft Local Plan (2022) proposed that the western boundary of the green gap be amended so that it aligned with the settlement boundary without any spaces. This will ensure the continued separation of the two settlements.
- 3.11. Through the Regulation 18 draft Local Plan consultation (2022), no comments were received regarding the 'Green Gap between Sturry and Hersden' and so no amendments have been made to the green gap following this consultation. The site boundary can be found on the draft policies map and under *Policy DS19 Habitats, landscapes and sites of local importance*.

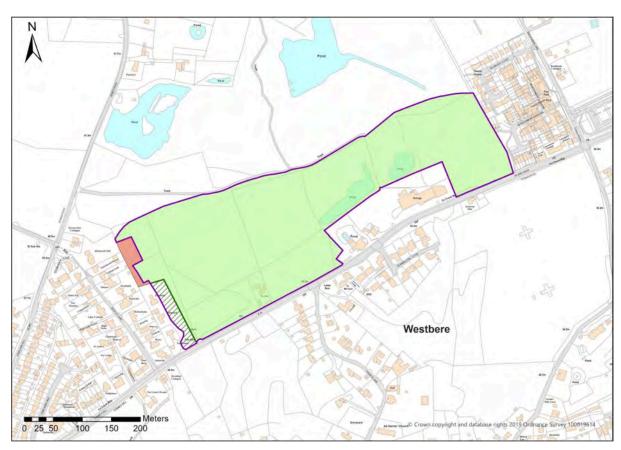
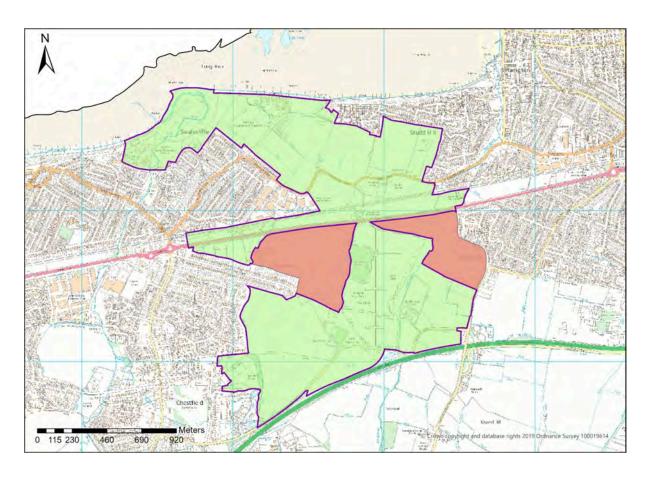


Figure 3.1: Proposed Green Gap between Sturry and Broad Oak (purple outline). The green area is the preferred option from the Options consultation (2021), the hatched zone is the proposed extension and the red area is proposed for removal.

## Green Gap between Herne Bay and Whitstable

- 3.12. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on the Green Gap between Herne Bay and Whitstable, the majority agreed with the preferred option of: Option NE5H (preferred option) keep the existing green gap identified in the current Local Plan.
- 3.13. It was identified at an early stage that new secondary schools, ideally located within the coastal area of the district, would be required to meet the growing demand. As set out in the Development Topic Paper (2022), published alongside the Regulation 18 Draft Local Plan consultation, SLAA240 Thornden Close and SLAA247 Bodkin Farm were both identified as suitable locations for new secondary schools.
- 3.14. Due to the limited availability of sites of sufficient size the draft Local Plan (2022) proposed that both sites be allocated for a new secondary school with supporting residential development. Therefore, the draft Local Plan (2022) proposed that the green gap be drawn around the sites. It should be noted that both sites have been encouraged to have landscape buffers and greenery adjacent to the green gap to prevent settlement coalescence.

- 3.15. All comments received through the Regulation 18 draft Local Plan consultation (2022) were reviewed, however there were no amendments made to the 'Green Gap between Herne Bay and Whitstable' following this. Comments received in relation to the two school allocation sites, W6 'Bodkin Farm', and HB4 'Land to the West of Thornden Wood Road', have also been reviewed and any necessary amendments to the site allocation policies have been made. These amendments are outlined in the Consultation and Engagement Topic Paper (February 2024).
- 3.16. In developing the Regulation 18 draft Local Plan (2024), the council has updated the Infrastructure Delivery Plan which confirms the need for two new secondary schools, to accommodate the impact of planned growth. The Development Topic Paper (2024) reiterates that both SLAA247 'Bodkin Farm', and SLAA240 'Thornden Close' are the only suitable sites of sufficient size within the coastal area to accommodate two new secondary schools. The Regulation 18 draft Local Plan (2024) policy allocations for the two secondary school sites, *HB4 Land to the West of Thornden Wood Road* and *W6 Bodkin Farm*, ensures that both sites will be designed to retain as much openness as possible within the green gap, with the schools and playing fields located adjacent to the green gap, as stated in the Development Topic Paper (2024). The green gap boundary can be found on the draft policies map and under *Policy DS19 Habitats, landscapes and sites of local importance*.



- Figure 3.2: Proposed Green Gap between Sturry and Broad Oak (purple outline). The green area is the 2017 Local Plan extent and the red area is proposed for removal.
- 3.17. The council has also prepared a Herne Bay and Whitstable Green Gap Improvement Plan (2023-2028) which sets out a range of measures intended to improve the functionality and biodiversity within this green gap.

#### **Green Gap between Sturry and Broad Oak**

- 3.18. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on the Green Gap between Sturry and Broad Oak, the majority agreed with the preferred option of: Option NE5J (preferred option) keep the existing green gap identified in the current Local Plan.
- 3.19. It was acknowledged in the 2017 Local Plan that Strategic Site 2 Land at Sturry/Broad Oak, would need to clearly identify and explain how the green gap would be integrated in the masterplan. The site now has a granted planning permission with a masterplan which identifies the green gap. To reflect this, it has been proposed that the green gap to the west of the A291 be drawn as it is in the masterplan to ensure the continued protection of the entire green gap.
- 3.20. The Regulation 18 draft Local Plan (2022) identified SLAA011 Land North of Popes Lane for a residential development allocation. Sturry's settlement boundary was also reviewed to include the residential development on this site. However, due to the close proximity of Broad Oak, it was proposed that the green gap be extended to the north-east, and within the boundary of this site, to prevent any future development which could lead to the coalescence of the two settlements.
- 3.21. Through the Regulation 18 draft Local Plan consultation (2022), representations were received from the developer on the evidenced need for the extension of the green gap. The green gap extension however is required to reduce the risk of coalescence between Sturry and Broad Oak in light of the draft Local Plan (2024) site allocation Policy R9 'Land north of Popes Lane'.
- 3.22. Whilst the green gap extension overlaps the site boundary for Policy R9, the Development Topic Paper (2024) sets out the amount of development which can be accommodated within the allocation boundary to retain the integrity of this green gap. The green gap boundary can be found on the draft policies map and under *Policy DS19 Habitats, landscapes and sites of local importance*.

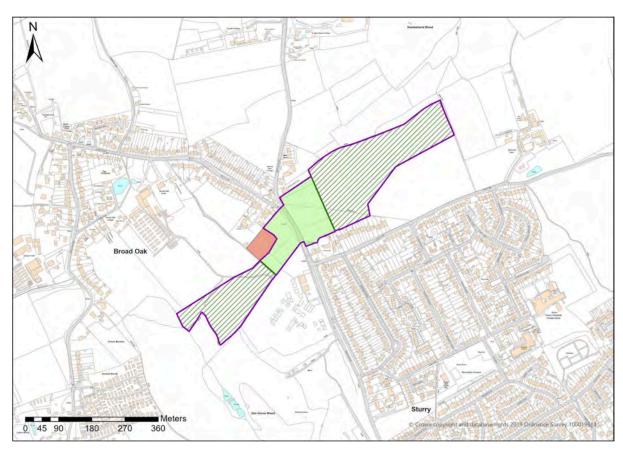


Figure 3.3: Proposed Green Gap between Sturry and Broad Oak (purple outline). The green area is the 2017 Local Plan extent, the hatched zone is the proposed extension and the red area is proposed for removal.

## Green Gap between Canterbury and Tyler Hill

- 3.23. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on the Green Gap between Canterbury and Tyler Hill, the majority agreed with the preferred option of: Option NE5L (preferred option) keep the existing green gap identified in the current Local Plan.
- 3.24. Through the Regulation 18 draft Local Plan consultation (2022), no comments were received regarding the 'Green Gap between Canterbury and Tyler Hill' and so no amendments have been made to this green gap following the 2022 consultation.
- 3.25. Due to this no further boundary amendments have been made. The Green Gap is included on the draft policies map and under *Policy DS19 Habitats, landscapes and sites of local importance*.

## **Green Gap between Canterbury and Bridge**

- 3.26. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on the green gap between Canterbury and Bridge, the majority agreed with the preferred option of: Option NE5N (preferred option) keep the green gap and think about opportunities to change the boundaries.
- 3.27. Through the Regulation 18 draft Local Plan consultation (2022), no comments were received regarding the 'Green Gap between Canterbury and Bridge' and so no amendments have been made to the green gap following the 2022 consultation.
- 3.28. Due to this, no further boundary amendments have been made. The green gap is included on the draft policies map and under *Policy DS19 Habitats, landscapes and sites of local importance*.

### **Green Gap between Canterbury and Sturry**

- 3.29. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on the Green Gap between Canterbury and Sturry, the majority agreed with the preferred option of: Option NE5P (preferred option) keep the existing green gap identified in the current Local Plan.
- 3.30. The review of the Canterbury urban area and Sturry settlement boundary identified a small parcel of land to the west of the 2017 Local Plan green gap boundary that was neither in the settlement boundary nor the green gap.
- 3.31. The parcel of land is separated from existing development in Canterbury by Vauxhall Road, Broad Oak Road and the River Stour. It is a greenfield site, adjacent to the existing green gap with no clear boundaries between the two. Based on its assessment, the boundary for the 'Green Gap between Canterbury and Sturry', has been amended to include this land parcel.(Figure 3.4).
- 3.32. Through the Regulation 18 draft Local Plan consultation (2022), no comments were received regarding the 'Green Gap between Canterbury and Sturry', and so no further amendments were made to the green gap following the 2022 consultation.

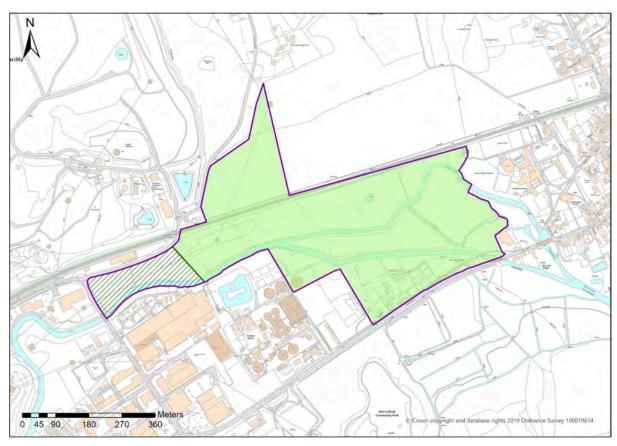


Figure 3.4: Proposed Green Gap between Canterbury and Sturry (purple outline). The green area is the 2017 Local Plan extent and the hatched zone is the proposed extension

## **Green Gap between Blean and Rough Common**

- 3.33. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on the Green Gap between Blean and Rough Common, the majority agreed with the preferred option of: Option NE5R (preferred option) keep the existing green gap identified in the current Local Plan.
- 3.34. Through the Regulation 18 draft Local Plan consultation (2022), no comments were received regarding the 'Green Gap between Blean and Rough Common', and so no amendments have been made to the green gap following the 2022 consultation.
- 3.35. Due to this further boundary amendments have been made. The green gap is included on the draft policies map and under *Policy DS19 Habitats, landscapes and sites of local importance*.

# New Green Gaps being considered as part of the Canterbury District Local Plan (2040)

#### **Areas of Search for New Green Gaps**

- 3.36. Of those who answered the 2021 *Draft district vision and Local Plan options* consultation question on new green gaps, the majority of respondents selected: Option NE5S think about opportunities to identify new green gaps.
- 3.37. The areas of search which were suggested through the 2021 options consultation included:
  - Green gap between Rough Common and Canterbury
  - Green gap between Sturry and Herne
  - Green gap between Canterbury (Thanington) and Chartham
  - Green gap between Harbledown and Canterbury
  - Green gap between Canterbury and Fordwich
  - Green gap between Lower Herne and Canterbury
  - Green gap between Radfall and Whitstable (Chestfield)
- 3.38. In 2022, two further areas of search were also identified between Fordwich and Sturry, and between Hersden and Westbere.
- 3.39. These study areas were assessed as part of the draft Local Plan (2022) evidence base.
- 3.40. Comments which were received through the Regulation 18 draft Local Plan consultation (2022) on the above study areas' site assessments, have been reviewed and any required amendments to the site assessments have been made (Appendix C).
- 3.41. Through the Regulation 18 draft Local Plan consultation in October 2022, two further areas of search were also suggested:
  - Green gap between Upstreet and Hersden
  - Green gap between Maypole and Hoath
- 3.42. All of the identified search areas have been assessed, with their full assessments set out in Appendix C.
- 3.43. The assessments of these study areas for potential new green gap designations, have also been updated to reflect the amended methodology (as outlined below), and in light of the revised allocations within the draft Local Plan 2040 (2024).

#### Methodology

#### Step 1: Technical assessment

- 3.44. The areas of search which were identified for each of the possible green gap locations underwent a site visit where key features such as: topography, trees and landscape features, notable built form and significant views into and from the site, were all recorded.
- 3.45. Based on Appendix A of Intersection of the updated Canterbury District LCA and Biodiversity Appraisal and planning policies (2021), the framework in the table below was used to assess the technical suitability of each search area by indicating what is considered a strong or weak green gap. This detailed desk-based assessment took consideration of information from consultation representations, site visits and GIS mapping.

Table 3.1: Assessment framework to assess the strength of a green gap search area

Criteria	Explanation	Indicators
Existing settlement identity and pattern	The extent to which the settlements that lie adjacent to the proposed gap have an individual townscape character and identity that contributes to the existing settlement pattern.	Strong The individual townscape character, form and pattern of the settlement that lies adjacent to the proposed gap are distinct (for example the presence of Conservation Areas and/ or Listed Buildings). The proposed gap plays a role in settlement separation and pattern.  Weak The individual townscape character, form and pattern of the settlements that lie adjacent to the proposed gap are not distinct. Loss or partial loss of the gap would not adversely affect the existing settlement pattern.
Landscape character	The landscape character, land use and landscape features of the proposed gap and their contribution to its character as open and undeveloped land.	Strong The settlements are within different Landscape Character Areas <sup>4</sup> . Existing rural land uses and landscape features contribute to the open and undeveloped character of the landscape, e.g. agriculture, horticulture, forestry. There is a low density or absence of development.  Weak

<sup>&</sup>lt;sup>4</sup> As set out in the Landscape Character and Biodiversity Appraisal 2020

Criteria	Explanation	Indicators
		Both settlements are within the same Landscape Character Area <sup>5</sup> .  There are significant man-made features or urban land uses that contribute to the developed character of the landscape.  The area lacks typical elements of rural vegetation e.g. farmland, hedges, trees etc.  The area has a suburban character and residential areas outside defined settlement boundaries weaken the perception of the gap as 'countryside'.
Visual Character	Any views to settlements or from settlements into the open countryside that contribute to that character and provide visual separation between settlements	Views to and from the settlement contribute positively to the visual character of the area. There are limited/no views between settlements and landscape elements (such as hills, ridges, and/or tall vegetation) within the gap contribute to the sense of visual separation between the settlements.  Alternatively, where there is intervisibility the view shows clearly differing settlement character and identity e.g. between an expanding urban edge and distinct rural village.  Open vistas and long views may also indicate a strong gap where they are an important part of the character of the landscape.  Weak  Views to and from the settlement do not contribute positively to the visual character of the area.  There is a clear inter-visibility between the settlements due to a lack of vegetation <sup>6</sup> .
Any planning permissions or Local Plan policy conflicts	Existing or proposed policy conflicts or developments which could impede the area from remaining as an open green gap.	Strong No planning permissions or allocations (saved or proposed) within the area. No proposed or existing policies which could conflict with the gaps function to separate the settlements.

As set out in the Landscape Character and Biodiversity Appraisal 2020
 Intervisibility alone does not indicate a weak gap and this criteria interplays with settlement identity and pattern e.g. intervisibility of contrasting settlement types may contribute to a stronger gap function.

Criteria	Explanation	Indicators
		Weak Planning permissions, allocations or policies (saved or proposed) which weaken the perception of the gap as 'countryside'.
Gap extent	Assess the role of the extent of the gap in maintaining physical separation between settlements.	Strong The gap is less than 2km away from a neighbouring settlement. The gap should be big enough to make it practical to develop policies for its protection, management and planning.  Weak
		A distance further than 2km is likely too great to prevent the coalescence of two settlements.  If the gap is too small for policies for its protection, management and planning to practically work.
Boundary Defensible	Boundaries should follow physical features on the ground, taking into account potential new boundary features that may alter the risk of settlement coalescence.	Strong Clear physical features on all edges. The gap is not subject to allocations or infrastructure projects (saved or proposed).  Weak Limited or no physical features to define the boundaries. The gap is subject to allocations or infrastructure projects (saved or proposed).
Potential for enhancement	Consider the potential enhancements to existing open space, wildlife areas, cultural heritage and access to the countryside (via PRoW etc).	Strong The gap is of poor or low quality land use or landscape.  Weak The gap is entirely covered by high level environmental designations and therefore already maintained to a high level.

Step 2: Planning and Local Plan suitability assessment

- 3.46. In light of the consultation responses to the Regulation 18 draft Local Plan consultation (2022) the council has reviewed the methodology used to identify potential new green gap designations. This step looks at the following factors:
  - Location of the study area relative to settlement hierarchy and countryside;
  - Potential development pressure from draft Local Plan allocations.
- 3.47. Study areas which concluded potential for a strong green gap in the technical assessment continued on to be assessed through Steps 2 and 3 of the methodology. For study areas which were assessed as having weak potential, further assessment was not considered necessary.

#### Location Assessment

- 3.48. In line with the Local Plan's spatial strategy approach, areas outside of the Urban Areas, the New Rural Settlement, the Rural Service Centres and Local Service Centres, as categorised in the Settlement Hierarchy, are considered countryside, as set out at draft Policy R19.
- 3.49. The Canterbury District Settlement Hierarchy establishes the different role and function of settlements across the district and is informed by the Canterbury District Rural Settlement Study (2020, 2023). This helps to direct where in the district development is suitable and unsuitable based on the various settlement types within the settlement hierarchy.
- 3.50. Due to the high level of protection that the Local Plan affords the countryside there is already significant protection against inappropriate development in these more rural locations, and as such, coalescence of settlements within the rural areas. Due to this, only study areas which were adjacent to one of the three Urban Areas or which were between a Rural Service Centre and a Local Service Centre were considered under pressure of coalescence, and therefore suitable for a potential green gap designation.
- 3.51. Study areas which were not adjacent to an Urban Area, or between a Rural Service Centre and Local Service Centre, were not considered at risk of inappropriate development and so were not carried forward for further assessment.

#### Development Assessment

3.52. Following their assessment in light of the settlement hierarchy, study areas were then assessed in relation to any proposed development allocations. Study areas which were adjacent to proposed development from the 2017 Local Plan or within the 2024 draft Local Plan, were considered potentially 'suitable' to prevent further risk of coalescence. For study areas with no adjacent development proposed, it was considered that there was no pressure of coalescence.

3.53. Study areas that did not have any development proposed within the adjacent settlements abutting the study area, were therefore considered 'unsuitable' as green gaps in the absence of coalescence pressure. These study areas were then not taken forward to Step 3 to establish a green gap extent.

#### **Step 3: Identifying the green gap extent**

3.54. Study areas which were assessed as suitable green gaps following the assessment at steps 1 and 2, then required an established green gap boundary in order to be designated. The green gap extent was determined using the information within the technical assessment, including the defensible boundary analysis and the settlement boundaries as outlined in the Development Topic Paper (2024).

#### **Analysis**

- 3.55. The assessments of these eleven areas of search are set out in Appendix C.
- 3.56. The following five areas of search were concluded as having **weak** potential a a green gap and so were not carried forward to Step 2 of the study area analysis:
  - Between Rough Common and Canterbury No clear defensible boundary can be defined and the study area contains dispersed existing development. Large areas of the site are already publicly accessible open space and playing pitches in the draft Local Plan
  - Between Sturry and Herne The study area is too vast with no easily defined
    defensible boundary and there is existing development dispersed across the site.
    Large areas of the site are already protected with high level designations such as SAC
    and SSSI.
  - **Between Harbledown and Canterbury** There is no clear green space between the two settlements.
  - **Between Canterbury and Fordwich** The study area conflicts with draft Local Plan policies and has no defensible boundary to the south.
  - Between Lower Herne and Canterbury The study area is too vast with no easily
    defined defensible boundary and there is existing development dispersed across the
    site. Large areas of the site are already protected with high level designations such as
    SSSI, NNR and LNR.
- 3.57. Six areas of search were identified as potential strong green gaps following step 1 and progressed to step 2. Three of these six study areas were considered 'unsuitable' as green gaps following the Step 2 analysis. These were:

- **Between Fordwich and Sturry** Whilst the study area was suitable in light of the settlement hierarchy, there is no development proposed that sits adjacent to the site adding any pressure of coalescence.
- **Between Upstreet and Hersden** Whilst the study area was suitable in light of the settlement hierarchy, there is no development proposed that sits adjacent to the site adding any pressure of coalescence.
- Between Maypole and Hoath The study area sits between Maypole, which is categorised as a Village, and Hoath which is a Local Service Centre. The site is not adjacent to one of the three Urban Areas or between a Rural and Local Service Centre.
- 3.58. Following step 2, 3 areas of search were identified as suitable in terms of the settlement hierarchy and spatial strategy in the draft Local Plan. These were:
  - Between Canterbury and Chartham;
  - Between Radfall and Whitstable; and
  - Between Hersden and Westbere.

#### Recommendations

- 3.59. Based on these assessments, additional green gaps have been included in draft policies map and under *Policy DS19 Habitats, landscapes and sites of local importance*, between:
  - Canterbury and Chartham;
  - Whitstable and Radfall; and
  - Hersden and Westbere.

## 4. Local Green Spaces

- 4.1. The Green Gaps & Local Green Spaces Review (2021) assessed the two existing Local Green Spaces and determined it was still appropriate to designate both as Local Green Spaces.
- 4.2. All who commented on option NE9. How should we make sure our approach to local green spaces is still effective? of the Draft district vision and Local Plan options consultation agreed with the preferred option: Option NE9B (preferred option) keep the local green spaces identified in the current Local Plan.
- 4.3. Prospect Field, Joy Lane, Whitstable and Columbia Avenue Recreation Ground, Columbia Avenue, Whitstable Local Green Spaces are protected under *Policy DS19 Habitats, landscapes and sites of local importance*.
- 4.4. In response to the *Draft district vision and Local Plan options* consultation, Whitstable Beach was suggested for consideration as a Local Green Space. The site was previously identified as *LGS19 West Beach* in the report on Assessments of Local Green Space Proposals in Canterbury District (April 2014)<sup>7</sup>.
- 4.5. The previous assessment on the site identified it as possibly suitable to be designated as a Local Green Space and was therefore included within the last Local Plan which was submitted to a Planning Inspector for examination. Within the Report on the Examination of the Canterbury District Local Plan (June 2017)<sup>8</sup>, the Inspector removed *LGS19 West Beach* as a LGS stating:

348. Instead the Council has sought to designate a single section of the beach (West Beach) between Whitstable Harbour and the West Beach Pavilion Caravan Park, an area of about 4.26ha, covering 1.17km of coast. It is mainly a pebble beach with some grassed areas adjacent to the sea wall. It is in close proximity to Whitstable Town Centre and residential areas, having no promenade, and has historic associations with boatbuilding and oyster fisheries. However, many of the reasons for not designating the full length of beach apply here. While special to the local community, West Beach has much wider usage, including by visitors and holidaymakers in the summer. Although the area concerned is not large, it nevertheless still relates to an extensive length of coast. The beach contains groynes and other features that protect it from coastal erosion and the town centre from flooding – a wide area is in

<sup>&</sup>lt;sup>7</sup> Available: https://drive.google.com/file/d/10ohLjw6QO25pHR9kaYGJbjGctbfod2fQ/view?usp=sharing

https://drive.google.com/file/d/1xGuGge97AvO PmxqDJ4QpYqVjs73i9ia/view?usp=sharing

Flood Zone 3. Policy OS1 would allow engineering or other operations required for public safety but these might change the character of the beach as a public space.

349. The Beach is part of a Site of Special Scientific Interest and SPA, within a Conservation Area and designated as Existing Open Space in the adopted LP. It therefore receives a significant existing degree of protection. For the reasons given above West Beach should not be designated as LGS in the LP but should be retained as Existing Open Space. MM162 (part) to Policy OS1 is therefore necessary and the designation should not be included on the PM.

- 4.6. The council continues to protect open spaces. The beach discussed is included within the Draft Open Space Strategy and draft policies map. Therefore, the draft Local Plan *Policy DS24 Publicly accessible open space and sports* protects aims to protect the area from development.
- 4.7. The remaining points raised by the Planning Inspector in 2017 remain valid and therefore it is not considered suitable to re-submit *LGS19 West Beach* as a LGS within the Draft Local Plan. Instead, it will continue to be protected through other designations.
- 4.8. Through the call for sites, one site was submitted for consideration as a LGS: Wincheap Meadow, Canterbury. This site was assessed and not proposed to be allocated a LGS in the 2022 consultation version of the Regulation 18 draft Local Plan.
- 4.9. Representations made through the Regulation 18 draft Local Plan consultation (2022) about the Wincheap Meadow assessment have been reviewed and, where appropriate, the site assessment has been updated. The assessment is set out in **Appendix D**.
- 4.10. Therefore, the recommendation following review of, and amendments to, the site assessment remains that the site is not suitable to be a LGS. This is due to uncertainties about its capability to endure beyond the end of the plan period, limited public access (only a path through the site and not around it) and the future of the site is under current consideration.
- 4.11. Wincheap Meadow has not been included as a LGS in the draft Local Plan, but has been protected in the draft Local Plan under Policy DS19 Habitats, landscapes and sites of local importance as the site is a Local Nature Reserve and a Local Wildlife Site, and under Policy DS17 Habitats of international importance as the site is safeguarded for the delivery of strategic wetlands to mitigate the residual P and N generated by development within this plan as part of the Canterbury District Nutrient Mitigation Strategy.

# 5. Protected Open Spaces

## **Overview**

- 5.1. Policy OS9 of the Canterbury District Local Plan (adopted 2017) recognised 192 Protected Open Spaces (POS). These were previously assessed in 2013 and aim to protect the loss of existing open space, irrespective of whether they are accessible to the public. Some of these POS also provided a historic function of green spaces along the new A2990 Thanet Way.
- 5.2. The new Local Plan aims to place a higher priority on open space and the natural environment of our district. To this extent, *Policy DS24 Publicly accessible open space and sports*; and the policies map, have been produced to protect all existing accessible open space identified within the draft Open Space Strategy, not just a select few.
- 5.3. Additionally, to ensure the protection of all sports facilities, as supported by the Playing Pitch Strategy and Indoor Built Facilities Strategy, *Policy DS24 Publicly accessible open space and sports* protects the loss of sports facilities, and the same applies to education sites under *Policy DS9 Education and associated development*.
- 5.4. To prevent any unnecessary duplication of protections, and to ensure that all protections are still required, all POS have been assessed over 2021/22. The assessment determined whether there were any sites which were not included within the draft Local Plan protection policies and provided recommendations based on the assessments.
- 5.5. This was then reviewed in 2023, in light of the Regulation 18 draft Local Plan consultation (2022) responses, alongside any additional evidence or updates to existing evidence.

# Methodology

#### Phase 1

- 5.6. In confirming whether the sites are protected under any of the draft Local Plan policies, the following points are assessed. Consideration is given as to whether the site is:
  - publically accessible and a recognised open space typology;
  - a playing or sports facility; or
  - an education facility (school, college or university).

- 5.7. Parallel to the production of the draft Open Space Strategy, an initial assessment was conducted of the POS to check whether sites which met the definition of any of the accessible open space typologies were included within the Open Space Strategy document.
- 5.8. The document Review of Protected Open Spaces (March 2022) shows the result of this initial assessment and recommendations by site. Those that were accessible and met one of the open space typologies criteria were included within the draft Open Space Strategy.
- 5.9. These results were then collated and checked against the Playing Pitch Strategy to make a final recommendation as to whether the site is adequately protected or requires further assessment under Phase 2.

#### Phase 2

- 5.10. The remaining sites which were progressed to Phase 2 underwent site specific assessments.
  - **Step 1** Initial desk-based assessment of:
    - whether the site brownfield, greenfield or mixed If the site is brownfield the assessment stopped here as they are not appropriate to be protected as open green spaces;
    - Site area (ha);
    - Current use of the site if the site is a residential private garden it was considered inappropriate to protect due to permitted development rights of the owner;
    - Any relevant planning history If there is a granted planning permission which could impact the site's ability to endure the Local Plan period the assessment stopped here as it is not appropriate to protect a space that has permission for a conflicting use;
    - Whether the site is covered by International<sup>9</sup>, national<sup>10</sup> or local<sup>11</sup> environmental designations if a site is completely covered by one of these designations the assessment stopped here as this designations have a higher level of protection and they are covered under *Policy DS17 Habitats of international importance*, *Policy DS18 Habitats and landscapes of national importance* or *Policy DS19 Habitats*, *landscapes and sites of local importance*.
  - **Step 2** Site visits:

<sup>9</sup> This includes Special Protection Area (SPA), Special Area of Conservation (SAC) or RAMSAR

<sup>&</sup>lt;sup>10</sup> This includes Sites of Special Scientific Interest (SSSI), National Nature Reserve (NNR), Marine Conservation Zones (MCZ) or Kent Downs Area of Outstanding Natural Beauty (AONB)

<sup>&</sup>lt;sup>11</sup> This includes Local Nature Reserve (LNR), Local Wildlife Site (LWS), Regionally Important Geological / Geomorphological Sites (RIGS) or Local Green Space (LGS)

- Undertaken in 2022, each site which passed Step 1 was site visited and key features such as: topography, notable views into and from the site, trees and landscape features, and notable built form was recorded.
- **Step 3** a detailed desk-based assessment, using information from the site visits, was undertaken. Consideration was given to:
  - TPOs, Ancient woodland, priority habitat on the site;
  - Townscape: the appearance of the nearby built environment;
  - Landscape: the appearance of an area of land;
  - Topography: the form of the land surface;
  - Views: are there long distance views? Are there features limiting views?
  - Public access: is there public access to the entire site, public rights of way or is it private land?
  - Habitat connectivity: does the land act as a green ecological corridor between key habitats such as priority habitats or open space?
  - Landscape buffer: does the site act as a landscape buffer for example adjacent to a railway line or busy road?
- 5.11. Based on the assessment, a recommendation was then made on how the site should be considered in the Regulation 18 draft Local Plan (2022).

#### Phase 3

5.12. A review of the recommendations was undertaken in light of responses to the Regulation 18 draft Local Plan consultation (2022), amendments to the draft Local Plan (2024) including changes to allocations, and any other new or updated evidence.

### **Results and Recommendations**

#### Protected Open Spaces under OS9 in the 2017 Local Plan

- 5.13. Appendix E provides the overview results from the Phase 1 assessment.
- 5.14. Of the 192 POS sites, 17 progressed to Phase 2 for a site specific assessment as they are not protected under *Policy DS24 Publicly accessible open space and sports* or *Policy DS9 Education and associated development*. These are identified on Figures 5.1, 5.2 and 5.3.

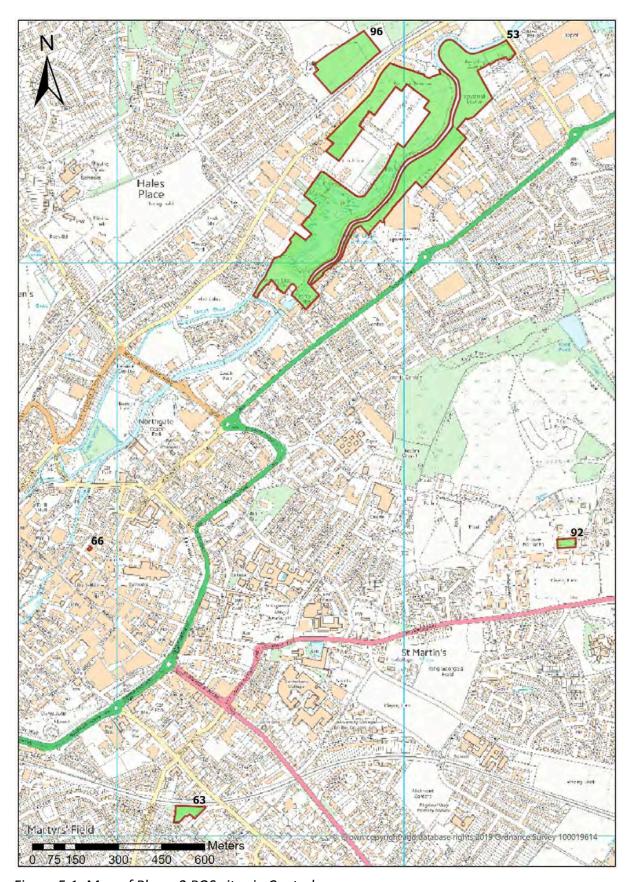


Figure 5.1: Map of Phase 2 POS sites in Canterbury.

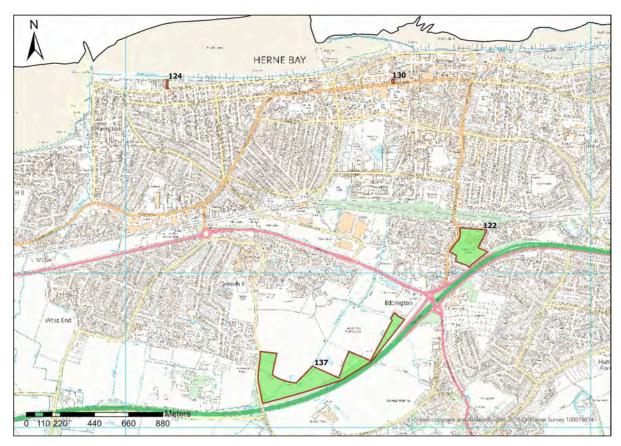


Figure 5.2: Map of Phase 2 POS sites in Herne Bay

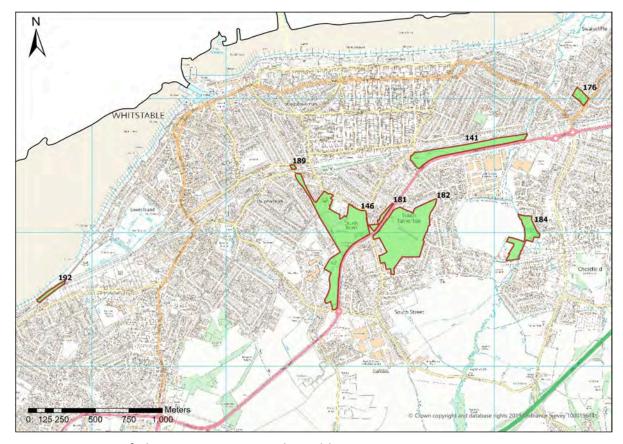


Figure 5.3: Map of Phase 2 POS sites in Whitstable

5.15. Step one of Phase 2 identified six sites as not being appropriate to continue assessing.

Table 5.4: Sites considered not appropriate to continue assessment (Phase 2, step 1)

ID	Site name / Location	Reason continued assessment was not appropriate
53	Great Stour, Ashford to Fordwich	Entire site is covered by Great Stour, Ashford to Fordwich: Local Wildlife Site
66	Land adjacent to 11 Orange Street	Private residential garden
92	Land at Howe Barracks (northern parcel)	Currently a brownfield site with a live planning permission for development. If through the building out of 2017 strategic Site 9: Howe Barracks this, or other parcels in the site, are open space they will then be protected through the Open Space Strategy.
122	Herne Bay Court	Currently a brownfield site with a live planning permission for development.
130	Land adjacent to Charles Bell Apartments, High Street	Private residential garden
176	Swalecliffe Community Centre	The remaining part of the site that is not already covered by the draft Open Space Strategy is a building, and therefore brownfield.

- 5.16. 11 sites progressed onto steps 2 and 3 of Phase 2. The detailed assessment of sites is included in Appendix B.
- 5.17. The final recommendations for these 11 sites are set out in Table 5.1.

Table 5.1: recommendations for the sites which required further assessment (Steps 2 and 3 of Phase 2)

ID	Site name / Location	Recommendation
63	Land adjacent to Puckle Lane	Exclude the part of the site which has been developed and extend the site to the west to include the rest of the parcel of woodland.  Protect the site due to its importance as green infrastructure in a highly developed, residential area (Priority habitat, ecological corridor and landscape buffer).
96	Land to the north-east of Kemsing Gardens	Protect the site due to its importance as green infrastructure (ecological corridor and landscape buffer).

ID	Site name / Location	Recommendation
124	Land adjacent to The Shingles, Western Esplanade	Western boundary to be amended along the residential boundary of Sea Breeze. Protect the site due to its importance as green infrastructure in a highly developed, residential area (ecological corridor and landscape buffer).
137	Land to south of former Herne Bay Golf Course	Boundary amended inline with the masterplan of 2017 Local Plan strategic site 4: Herne Bay Golf Course. Protect the site due to its importance as green infrastructure in a highly developed, residential area (ecological corridor and landscape buffer).
141	Thanet Way (west of The Oyster Bed)	The area of allotment open space is protected through the Open Space Strategy, and the draft Local Plan under <i>Policy DS24 - Publicly accessible open space and sports</i> .  The area covered by an existing Local Wildlife Site is protected under <i>Policy DS19 - Habitats, landscapes and sites of local importance</i> .  The area to the east should be protected due to its importance as green infrastructure (Priority habitat, ecological corridor and landscape buffer).
146	All Saints Church and surrounding land	Exclude the land to the north as it is protected through the Open Space Strategy as natural and semi-natural, amenity and cemetery, and the draft Local Plan under <i>Policy DS24</i> - <i>Publicly accessible open space and sports</i> . The other parcel, to the south, should be protected due to its importance as green infrastructure (Priority habitat, ecological corridor and landscape buffer).
181	Thanet Way (Land south of Bartlett Drive)	Protect the site due to its importance as green infrastructure in a highly developed, residential area (ecological corridor and landscape buffer).
182	Land west of Grasmere Road	Protect the site due to its importance as green infrastructure in a highly developed, residential area (ecological corridor and landscape buffer).
184	Land north of Grasmere Road	Protect the site due to its importance as green infrastructure in a highly developed, residential area (Priority habitat, ecological corridor and landscape buffer).
189	Land south of Teynham Road	Protect the site due to its importance as green infrastructure in a highly developed, residential area (ecological corridor and landscape buffer).

ID	Site name / Location	Recommendation
192	Land adjacent to Avoca, Seasalter Beach	Protect the site due to its importance as green infrastructure in a developed, residential area (Priority habitat, ecological corridor and landscape buffer).

- 5.18. No amendments have been made to these assessments or recommendations, since their publication as part of the evidence base for the Regulation 18 draft Local Plan (2022).
- 5.19. In addition, to the recommendations in the table above, it is important to note that several of the parcels of land alongside parcels of protected open space in the Open Space Strategy, continue to provide the historic function of green space alongside the Old Thanet Way. As such, whether publicly accessible or not, Sites 141: Thanet Way (west of The Oyster Bed), 146: All Saints Church and surrounding land, 181: Thanet Way (Land south of Bartlett Drive) and 182: Land west of Grasmere Road continue to provide an important function.

#### **Additional Green Infrastructure Spaces**

5.20. As part of the Regulation 18 draft Local Plan (2022) a Green Infrastructure Space was identified at Land east of Dorset Road.

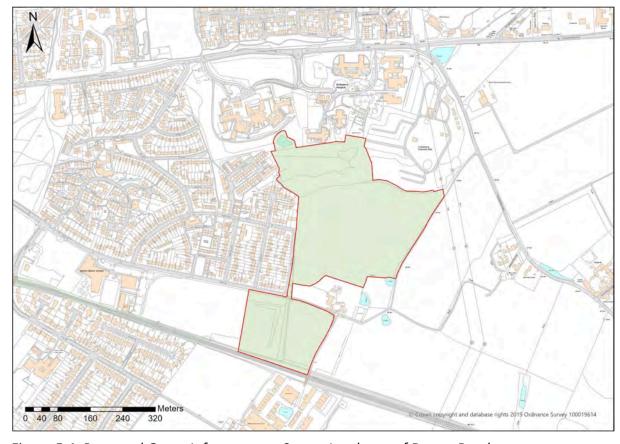


Figure 5.4: Proposed Green Infrastructure Space: Land east of Dorset Road

- 5.21. The previous assessment identified that Land east of Dorset Road is a greenfield site mainly used as orchards, with some areas of greenfields, trees and deciduous woodland Priority Habitat. Under the 2017 Local Plan, the site was outside of the Canterbury Urban Area boundary and was considered to be located within the countryside. In the Regulation 18 draft Local Plan (2022), with the proposed allocation of the sites in the East Canterbury Strategic Development Area, the Urban Area boundary of Canterbury was extended east to include the draft allocations. Therefore, this greenfield site was within the urban area, despite not being allocated for development.
- 5.22. In the Regulation 18 draft Local Plan (2022), while not publicly accessible, the parcel of Land east of Dorset Road provided an important function as green infrastructure in the built urban area and as an ecological corridor connecting to the Chequers Wood & Old Park SSSI. The site's location also provided the opportunity to improve the ecological connections between Canterbury and the draft development proposed in the East Canterbury Strategic Development Area. Therefore, it was recommended that the site be designated as a Green Infrastructure Space to protect the site from development, and provide opportunities for biodiversity enhancements over the period of the Local Plan.
- 5.23. However, the draft development proposed in the East Canterbury Strategic Development Area is no longer proposed in the Regulation 18 draft Local Plan (2024)<sup>12</sup>. As such the boundary of the Canterbury Urban Area has been amended to reflect this.
- 5.24. Therefore, Land east of Dorset Road and the formerly proposed site allocations adjacent to the site are now in the countryside. These parcels of land are protected by draft *Policy R19 Countryside* which prevents unsustainable development within the countryside.
- 5.25. Due to the protection that policy *R19 Countryside* offers, there is limited risk of unsuitable development at the site. Therefore, Land east of Dorset Road is not proposed as a Green Infrastructure Space in the Regulation 18 draft Local Plan (2024).
- 5.26. Historically land adjacent to the new A2990 Thanet Way, was identified through the design of the road to be protected as part of the scheme. These areas of land help to sustain the rural character of this edge-of-urban location and contribute significantly to the sense of place along this corridor. As noted above many of these pieces of land are protected in the Regulation 18 draft Local Plan (2024) as open space or Green Infrastructure Spaces.
- 5.27. The protection of this land adjacent to the new A2990 Thanet Way is particularly important where new development has been located on one side of the A2990 Thanet Way. This was reiterated through representations to the Regulation 18 draft Local Plan consultation (2022).

<sup>&</sup>lt;sup>12</sup> Further information on the justification for these sites being removed is available in the Development Topic Paper (2024)

- 5.28. In particular responses to the Regulation 18 draft Local Plan consultation (2022) identified concerns regarding development on the site SLAA172: Land at Golden Hill<sup>13</sup> due to it being opposite the 2017 Local Plan site allocation Site 7: North of Thanet Way, Whitstable (draft Policy CF1), which is already under construction. Development on this site would result in development on both sides of the Thanet Way contrary to the draft Local Plan's protection of these areas.
- 5.29. Therefore this contributed to the removal of the site 'Land at Golden Hill', as a housing allocation, from the Regulation 18 draft Local Plan (2024). Further information regarding the reason for the removal of this site allocation is available in the Development Topic Paper (2024).
- 5.30. In light of the above, the site was assessed to determine its suitability for protection as a Green Infrastructure Space. This assessment excluded the residential property on the site due this to being brownfield land, however included the north-eastern section of the draft site allocation 'Land South of Thanet Way' which is identified as open space / biodiversity improvement opportunities within the concept masterplan in draft Policy W5.

<sup>&</sup>lt;sup>13</sup> Draft allocation under Policy W7: Land at Golden Hill in the Regulation 18 draft Local Plan consultation (2022)

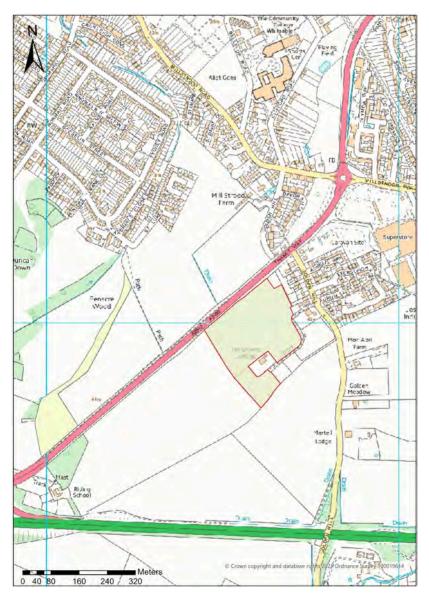


Figure 5.5: Proposed Green Infrastructure Space: Land at Golden Hill

- 5.31. The site is greenfield agricultural land and under the 2017 Local Plan it was considered within the countryside as it was outside the Whitstable Urban Area boundary. Due to the proposed allocation, Land South of Thanet Way (draft Policy W5) in the Regulation 18 draft Local Plan (2024), the Urban Area boundary of Whitstable is extended to the south to include the proposed allocated site. Therefore, this greenfield site is now within the urban area, but it is not allocated for development.
- 5.32. While public accessibility may not be possible for the entire site, the parcel of Land at Golden Hill provides an important function as green infrastructure in the built urban area, alongside the new A2290 Thanet Way as discussed above.
- 5.33. The site's location provides the opportunity to improve ecological connections between Whitstable urban area, Site 7: Land North of Thanet Way (which is under construction)

carried forward from the 2017 Local Plan, the development proposed in draft allocation W7: Land South of Thanet Way, and to the countryside (including the Blean Woodland Complex). Therefore, it is recommended that the site be designated as a Green Infrastructure Space to protect the site from development, and provide opportunities for biodiversity enhancements over the period of the Local Plan.

#### Summary

- 5.34. The final recommendations include designating 11 sites as Green Infrastructure Spaces. This designation aims to protect sites which continue to provide an important role as strategic green infrastructure as an ecological corridor or landscape buffer. Therefore, public access is not required, nor do the sites need to be council owned or included within the IDP.
- 5.35. Green Infrastructure Spaces are designated on the draft policies map and under *Policy DS19 Habitats, landscapes and sites of local importance* in the draft Local Plan.

# Draft site allocations and environmental protections

# **Functionally Linked Land**

- 6.1. It was identified by Natural England through the Regulation 18 draft Local Plan consultation (2022) that the potential impacts of the draft Local Plan on Functionally Linked Land (FLL) required further assessment work prior to the Regulation 19 stage of the Local Plan.
- 6.2. The council has taken a proactive approach and has undertaken this work to inform this Regulation 18 draft Local Plan (2024).
- 6.3. As identified in the Habitat Regulation Assessment (HRA) supporting this Regulation 18 draft Local Plan (2024) there were 8 sites that had the potential of being FLL for Golden Plover:
  - Land at Merton Park (draft Policy C6)
  - Land to the North of Hollow Lane (draft Policy C7)
  - Land north of University of Kent (draft Policy C12)
  - Land at Brooklands Farm (draft Policy W4)
  - Land South of Thanet Way (draft Policy W5)
  - Land to the West of Thornden Wood Road (draft Policy HB4)
  - Altira (draft Policy HB8)
  - Broad Oak Reservoir and Country Park (draft Policy R17)
- 6.4. As set out in the HRA (2024):

'FLL for golden plover can be difficult to identify at the plan level as regional distributions and the use of many fields will vary year to year according to local and regional conditions (e.g. cold winters may increase use of some terrestrial habitats) and cropping patterns. Furthermore, this variability and transience creates a risk of potential effects that cannot be avoided by simply excluding certain fields or sites in the allocation process, and it is possible that some allocation areas will, in the future, become valuable for this species. Full assessment of this aspect must therefore necessarily be deferred to the project-level, which the Preferred Options Local Plan requires through its policy provisions.'

6.5. To safeguard potential FLL, the council included a requirement in all 8 of the site allocation policies as identified above, to 'Assess the site's potential to be functionally linked land for golden plover, in line with Policy DS17'.

6.6. An additional point was added to **Policy DS17 - Habitats of international importance** specifying that an individual site assessment is required where there is the potential for a site to be functionally linked land with a SPA, SAC and/or RAMSAR. As well as the need to abide by the mitigation hierarchy of avoid, then minimise, and then mitigate.

#### **Ancient Woodland**

- 6.7. The NPPF protects irreplaceable habitats such as ancient woodland and ancient or veteran trees (paragraph 186).
- 6.8. The council has endeavoured to ensure that the draft Local Plan also has these protections of irreplaceable habitats built in throughout, including during the Strategic Land Availability Assessment, Sustainability Appraisal of the Strategic Land Availability Assessment and site allocations.
- 6.9. This is further supported by the protections included with *Policy DS18 Habitats and landscapes of national importance*.
- 6.10. Of the 44 new sites which have been allocated in the draft Local Plan for housing, employment and infrastructure, only three contain any ancient woodland.
- 6.11. Land at Brooklands Farm (Policy W4) has a section of ancient woodland along the water course that runs through the site. As such, this section is also Flood Zone 2 and 3. Therefore, no development would be permitted in this area of the site, as highlighted in the draft policy wording. This means development, in line with the criteria set out in the draft policy, would not result in the loss or deterioration of ancient woodland or ancient or veteran trees.
- 6.12. Policy R17 Broad Oak Reservoir and Country Park contains significant land for a new reservoir and country park. The draft policy concept masterplan clearly identifies where the reservoir, water treatment works and visitor centres are anticipated. None of these indicative development areas contain ancient woodland or ancient or veteran trees. The remainder of the site is allocated for a country park which would enhance the natural environment. Therefore, this allocation is not expected to result in the loss or deterioration of ancient woodland or ancient or veteran trees.
- 6.13. Based on ancient woodland mapping information provided by Natural England, the proposed new settlement at Land north of the University of Kent (Policy C12) includes two small parcels of ancient woodland. The western parcel will be retained, as demonstrated in the draft policy concept masterplan so it is not expected that the western parcel will lose or suffer deterioration of ancient woodland or ancient or veteran trees.

- 6.14. The second parcel known as Long Thin Wood, covering 0.41ha, has the potential of being impacted by the provision of primary access to the site. Work is still ongoing in relation to the exact route of the access and its construction so the exact implications for the parcel of ancient woodland is not currently quantifiable.
- 6.15. However, the applicant has undertaken an assessment of historic maps, which sought to establish if Long Thin Wood meets the definition of ancient woodland. The evidence provided to date suggests that the woodland may not meet the definition of ancient woodland. To be ancient woodland the woodland has to have existed since at least 1600, however the maps available do not appear to show this woodland in situ until at least 1830. In addition, the evidence did not find any ancient trees within the woodland. An Arboricultural Impact Assessment found that no veteran trees would be affected by the access road proposed for the site.
- 6.16. Therefore, current evidence would suggest that Long Thin Wood does not meet the NPPF definition of ancient woodland.
- 6.17. The NPPF allows for loss or deterioration of irreplaceable habitats when there are wholly exceptional reasons and a suitable compensation strategy.
- 6.18. The development of Land north of the University of Kent (Policy C12) is for a new mixed-use settlement which is identified as part of the district's spatial strategy. There are clear benefits arising from the delivery of a circa 2,000 home strategic new settlement development to meet the future housing needs of the district, together with employment land use secured as part of the mixed use proposal.
- 6.19. If necessary, there is clear potential for a suitable compensation strategy to be devised that mitigates the loss of the ancient woodland and provides significant additional planting within the site to improve habitat connectivity particularly of the Blean Woodland Complex.
- 6.20. In a precautionary approach, the council has acknowledged in draft *Policy C12 Land North* of the University of Kent, including reference to draft *Policy DS18 Habitats and landscapes* of national importance, that Long Thin Wood may ultimately be classified as ancient woodland and the policies set out that any impacts on the woodland must be minimised. If deemed necessary, the council would also expect adequate mitigation and compensation measures and an implementation plan, in line with the policy requirements.

# 7. Blean Woodland Complex

- 7.1. The Blean Woodland is one of the largest areas of ancient woodland in England and a fundamental component of the district's landscape character.
- 7.2. **Policy DS23 The Blean Woodland Complex**, identifies the continued importance of this area and seeks to protect it from inappropriate development while supporting its sensitive restoration and improving connectivity and biodiversity including rewilding and wider landscape restoration, where appropriate.
- 7.3. This policy builds on *Policy LB11: The Blean Complex* in the adopted 2017 Local Plan.
- 7.4. Through the Regulation 18 draft Local Plan consultation (2022) and meetings with stakeholders it became apparent that an area identified on a map as the Blean Woodland Complex would help strengthen the policy and support its interpretation.
- 7.5. As such the council reviewed existing designations and land use to determine the appropriate area to cover. Due to the nature of the draft policy, woodland land use was the focus of the search and arable land / pastures were not deemed, for this purpose, to be part of the Blean Woodland Complex.
- 7.6. Following this review it was decided that, the designations listed below would form the Blean Woodland Complex:
  - Blean Complex SAC entire area
  - Church Woods SSSI entire area
  - East Blean Woods entire area
  - Ellenden Wood SSSI entire area
  - West Blean and Thornden Woods SSSI entire area
  - Blean Woods NNR entire area
  - No Mans Orchard LNR- entire area
  - Blean Woods South LWS entire area
  - Blean Woods, Harbledown to Dunkirk LWS entire area
  - Clowes Wood and Marley Wood LWS entire area
  - Blean Pastures LWS only the eastern half of the northern of the three parcels making up the designation, as this is the only section with woodland.
- 7.7. These were then drawn on the policies map (see Figure 7.1 below), and should be used in the implementation of *Policy DS23 The Blean Woodland Complex*.

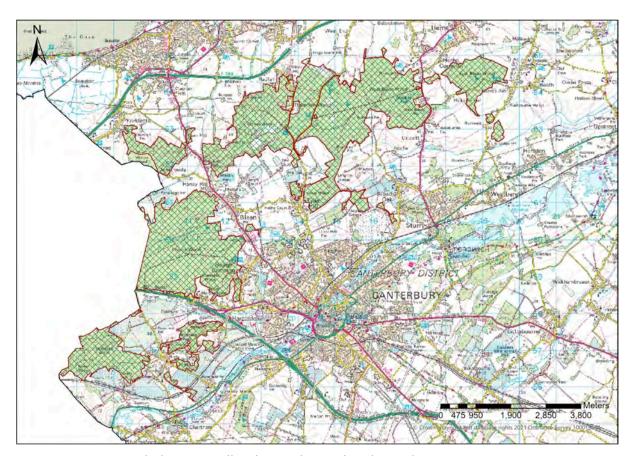


Figure 7.1: Proposed Blean Woodland Complex outlined in red

# 8. Wetlands

- 8.1. Based on the level of growth identified through the draft Local Plan, the draft Canterbury District Nutrient Neutrality Strategy identifies a residual need for approximately **41ha** of wetland to offset the nutrient budget up to 2040/41. In order to establish 41ha of fully operational wetlands, approximately 75ha of total land may be required. This is a significant potential level of need and there are very limited areas across the district within which such provision can be located.
- 8.2. Areas of land along the River Stour in the Canterbury district were identified as potential sites for wetland creation. These were then assessed in the draft Nutrient Neutrality Strategy.
- 8.3. All areas identified as green (yes suitable) or amber (maybe suitable) have been safeguarded as wetland on the draft Policies map and under *Policy DS17 Habitats of international importance* of the draft Local Plan. Given the scale of the potential need for wetland mitigation within the district to support the delivery of the draft Local Plan, it is critical that potentially suitable areas for wetland creation are safeguarded, and are not needlessly lost to other development.
- 8.4. The parcel of land to the south of Sturry Road on the edge of Fordwich was identified as suitable with the area furthest from the river being maybe suitable. This area was also submitted through the call for sites for renewable energy or natural environment uses. The site is located immediately downstream of the Canterbury WWTW and immediately upstream of the Stodmarsh site, and therefore presents an important opportunity for a high-efficiency wetland, which could have a significant impact on the overall nutrient budget. As the site is available, suitable and could provide multiple benefits (such as a natural separation between Fordwich and Canterbury), this area of land has been proposed to be allocated for wetland. *Policy C20 Land to the south of Sturry Road* provides additional certainty above the safeguarded parcels of land under *Policy DS17 Habitats of international importance*.
- 8.5. Draft Policy C20 Land to the south of Sturry Road allocates 15.14ha of wetland, and draft Policy DS17 Habitats of international importance safeguards a further nine parcels of land covering 97.19ha.
- 8.6. The draft Local Plan altogether identifies land for up to **112.33ha** of potential wetland which allows for a buffer. This additional area will allow for some discretion over which areas to create wetlands on, as well as appropriate buffer zones and floodplain compensation areas on the site.

# 9. Supporting biodiversity recovery and publicly accessible open space

- 9.1. On 19 October 2023 the council declared a Canterbury Biodiversity Emergency. This was unanimously approved by councillors and recognises the global biodiversity emergency and the local impact this could have on the communities and businesses served by the council.
- 9.2. The Regulation 18 draft Local Plan (2024) has been informed by this Biodiversity Emergency, as well as several evidence documents and strategies, including:
  - Canterbury District Pollinator Action Plan (2023 28)
  - Green Infrastructure Strategy (2018 2031) and associated documents
  - Draft Canterbury District Open Space Strategy (2024 2040)
  - Canterbury District Trees, Hedges and Woodland Strategy (2024 2040)
- 9.3. The **Canterbury District Pollinator Action Plan** establishes 21 actions and aims to ensure that the needs of pollinators are always considered across all relevant Council functions and responsibilities, and are taken into account in all our relevant strategies and policies.
- 9.4. The Action Plan establishes five objectives which are:
  - Objective 1: Canterbury City Council to promote/support strategic-level actions to protect, enhance and expand pollinator habitat;
  - Objective 2: Canterbury City Council to manage the land it owns, controls or can influence for the benefit of pollinators;
  - Objective 3: Canterbury City Council to use the planning system to better protect pollinators and to increase suitable habitat and connectivity between existing habitat;
  - Objective 4: All partners to raise awareness of the importance of pollinators and encourage people to take action themselves;
  - Objective 5: Monitor actions and outcomes and report on progress.
- 9.5. The **Green Infrastructure Strategy (2018 2031)** provides a vision that sees a focus on 'Delivering an integrated and multifunctional green infrastructure network covering all of Canterbury district, which supports sustainable development, health and wellbeing and economic prosperity and provides a distinctive and high quality local environment that is managed and valued by Canterbury's communities'. It assesses the district's key habitat contributions and uses this information to map possible interventions that demonstrate opportunities for the delivery of more, bigger, better and joined up green infrastructure.

- 9.6. The draft **Canterbury District Open Space Strategy (2024 2040)** establishes standards for the quantity, quality and accessibility of the district's open spaces. This is expected to be published for consultation alongside the Regulation 18 draft Local Plan (2024).
- 9.7. The previous consultation on the draft Open Space Strategy (2022) demonstrated that 80% of respondents agreed to the draft OSS vision and of the three supporting aims, which received support ranging from 92%, 89% and 78% respectively.
- 9.8. The Canterbury District Open Space Strategy vision is: 'To develop and maintain an interconnected network of diverse, high quality open spaces which contribute to biodiversity, habitats and the needs of local people to help raise the quality of life for all residents and visitors to the Canterbury district'.
- 9.9. The strategy promotes the provision of 8.845ha of open space within new developments per 1000 population. These standards are set out in more detail in *Policy DS24 Publicly accessible open space and sports* of the Regulation 18 draft Local Plan (2024).
- 9.10. The **Canterbury District Trees, Hedges and Woodland Strategy** establishes a vision which states that "Starting from a position of strength, by 2045 Canterbury district will have made a strong start in protecting and maintaining its existing precious trees, woodlands and hedgerows and will have expanded cover of trees in both urban and rural areas. Through doing this it will have increased the benefits of trees to people, to wildlife and the wider environment".
- 9.11. The strategy summarises existing statistics on the average tree cover for both Kent and the Canterbury district. This is demonstrated in Figure 9.1 below.

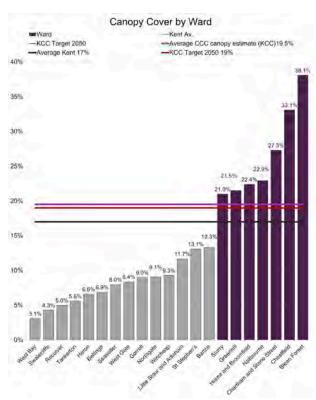


Figure 9.1: Canopy cover for Kent and Canterbury district (extract from Canterbury District Trees, Hedges and Woodland Strategy)

- 9.12. Figure 9.1 demonstrates that the average Canterbury district canopy is estimated to be 19.5%, as compared to an average canopy cover for Kent at 17%. Therefore, to ensure new developments do not lead to a decrease in this important feature within the district and to ensure new developments contribute to Canterbury's local character the draft Local Plan (2024) seeks the provision of 20% tree cover across sites of over 300 new homes. This 20% tree cover requirement includes both new trees provided and existing tree cover which is retained post development. *Policy SS1 Environmental strategy for the district* and *Policy DS21 Supporting biodiversity recovery* set out this requirement and further information.
- 9.13. Several representations to the Regulation 18 draft Local Plan (2022) were in relation to the proposal to seek 20% biodiversity net gain (BNG), rather than the minimum 10% mandated by the government.
- 9.14. The council's key strategies and their visions, as summarised above, demonstrate the valuable contribution that the natural environment makes to delivering nature's recovery and to health and well being. To meet the vision and aims of these strategies, and to respond positively to the successful public petition seeking a council declaration of a biodiversity emergency, we believe that a BNG target of 20% is required and is deliverable.

- 9.15. It is important to note that an uplift from BNG 10% to 20% does not have to see a doubling in the size of the area of BNG being provided because an uplift in the ecological quality from the 10% proposal across the same area could also be a means of delivering the 20% BNG.
  - In September 2020, the Kent Nature Partnership produced their 'Justification for a Biodiversity Net Gain target of 20% in Kent', a report that built upon Natural England's assessment (*Vivid Economics, June 2018*) detailing that the additional investment required to move from 10% BNG to 20% does not mean twice the expense. As the Natural England assessment found, careful design and early consideration can see the achievement of significant biodiversity improvement with little or even no additional spend.
- 9.16. This was further demonstrated in the 'Viability Assessment of Biodiversity Net Gain (June 2022)' produced by SQW on behalf of KCC<sup>14</sup>. The viability assessment of BNG across Kent found:
  - A shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances when delivered onsite or offsite;
  - The biggest cost, in most cases, is to get to the mandatory minimum 10% BNG;
  - The increase to 15% or 20% BNG, in most cases, costs much less and is generally negligible; and
  - Because the BNG costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.
- 9.17. The Canterbury District Local Plan Viability Study (May 2022, May 2023) confirms that 20% BNG is viable and therefore the council believes that this policy approach is justified and deliverable. Developments can use the local strategies and evidence base to design schemes that can make a significant contribution to nature recovery in the district. This is reflected in draft *Policy SS1 Environmental strategy for the district* and *Policy DS21 Supporting biodiversity recovery*.
- 9.18. There were also several representations to the Regulation 18 draft Local Plan (2022) about whether 20% BNG, 20% tree cover and the 4ha of semi-natural open space provision per 1000 population were separate requirements or if features could count towards several of the requirements.
- 9.19. The difference between the mandatory 10% BNG and the council's policy requirement for 20% can, if ecologically appropriate, be achieved through the provision of a site's semi-natural open space requirement and the 20% tree cover. However, developers will need to demonstrate that the delivery of BNG through open space typology is ecologically

The document can be found on the Kent Nature Partnership website: https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf

- sustainable (taking into account potential disturbance) and does not impact the open spaces ability to perform its function and be accessible to the public.
- 9.20. The Canterbury District Local Plan Viability Study (May 2022, May 2023) confirms that 20% BNG, 20% tree cover and the open space requirements are viable and therefore the council believes that this policy approach is justified and deliverable. This is reflected in draft *Policy SS1 Environmental strategy for the district, Policy DS21 Supporting biodiversity recovery* and *Policy DS24 Publicly accessible open space and sports*.

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# **Appendices**

# **Appendix A: Abbreviations**

AONB	Kent Downs Area of Outstanding Natural Beauty
LGS	Local Green Space
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MCZ	Marine Conservation Zones
NNR	National Nature Reserve
RIGS	Regionally Important Geological / Geomorphological Sites
SPA	Special Protection Area
SAC	Special Area of Conservation
SSSI	Sites of Special Scientific Interest

# **Appendix B: Detailed Assessments**

The detailed assessment for Phase 2 of both the call for sites submissions and Protected Open Spaces is available on the council website. The Appendix is viewable as an interactive spreadsheet in the draft Local Plan Evidence Library, available on the council's website.

The Appendix is labelled *Natural Environment & Open Space Topic Paper. Appendix B\_protected open spaces & call for sites assessment (2024).* 

Please note that there has been no changes to this spreadsheet, since a version was published alongside the 2022 Natural Environment and Open Space Topic Paper.

The first tab labelled 'C4S Phase 2 assessment', sets out the assessment for the 9 Call for Site submissions, as discussed in Chapter 2 of this document.

The second tab labelled 'POS Phase 2 assessment', sets out the assessment for the 11 Protected Open Spaces, as discussed in Chapter 5 of this document.

# **Appendix C: Assessments of proposed green gaps**

# **Green Gap between Rough Common and Canterbury**

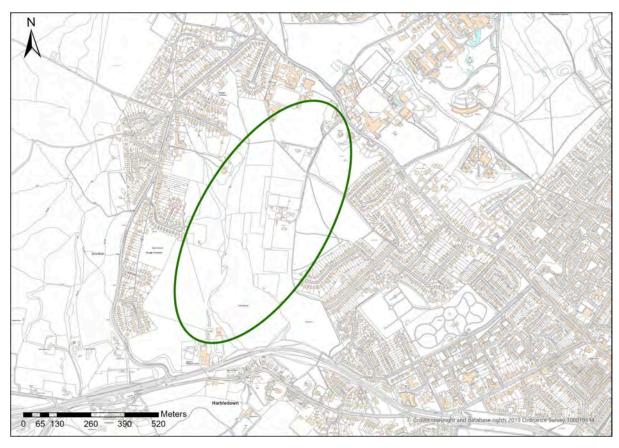


Figure C.1: Area of search between Rough Common and Canterbury

# **Step 1: Technical Assessment**

Green gap between	Rough Common and Canterbury
Description	Residential properties, commercial premises and playing fields associated with St Edmunds School. Grade 2 Listed Building: Neals Place. Green fields and trees.
Existing settlement identity and pattern	Rough Common Rough Common is a Local Service Centre which overall has a main road through the settlement with street facing houses. There are some side cal-du-sac roads with further housing.
	Canterbury The identity of this section of Canterbury City Centre is densely built up with a housing estate type layout. Due to the edge location there are various types of open space that provide some breaks in the housing.

<u></u>	<u> </u>
	Harbledown Conservation Area is to the south of the area of search.
Landscape character	Rough Common and area of search is within the Landscape Character Area: F2: Stour Valley Slopes. Canterbury is an urban area and does not have a Landscape Character Area.
	The area of search includes Priority Habitat, open space (amenity, allotments and semi-natural) and playing pitches.
	There are several land uses including recreation grounds and green spaces, agriculture and woodland. The area of search includes multiple existing buildings which are dispersed, with a higher density along Whitstable Road giving some parts a suburban character.
Visual Character	There is development along Whitstable Road between the two settlements which provides clear inter-visibility. Views from Whitstable Road beyond the development into the green space are limited. Parts of the centre of the area of search is woodland which restricts views between the settlements in most places further south.
Any planning permissions or Local Plan policy conflicts	The area would have to reflect the settlement boundaries within the draft Local Plan and the 2017 Local Plan allocation Rough Common.  Amenity, allotments and semi/natural open spaces are within the area and protected through the draft Open Space Strategy and on the draft Local Plan policies map under Policy DS24 - Publicly accessible open space and sports.  Sports facilities are also protected under Policy DS24 - Publicly accessible open space and sports.
Gap extent	The area of search is circa. 28ha and there is about 400m between the two settlements.
Boundary Defensible	The boundary would have to exclude 2017 Local Plan allocation Rough Common.  Due to existing development along Whitstable Road the boundary to the north could be challenging to identify an area of clear separation between the two settlements.
Potential for enhancement	There could be potential opportunities for enhancement.
Outcome	The areas of search between Rough Common and Canterbury, based on this technical assessment, would be considered as a potential <b>weak</b> green gap.

Boundary is not necessarily defensible as settlement coalescence along Whitstable Road due to the extent of existing development. Area of search contains dispersed existing development. Large areas of the site are already protected as publicly accessible open space and playing pitches in the draft Local Plan.

Due to the unsuitability of the site area as concluded through the technical assessment, this site was not considered appropriate for further assessment.

# **Green Gap between Sturry and Herne**

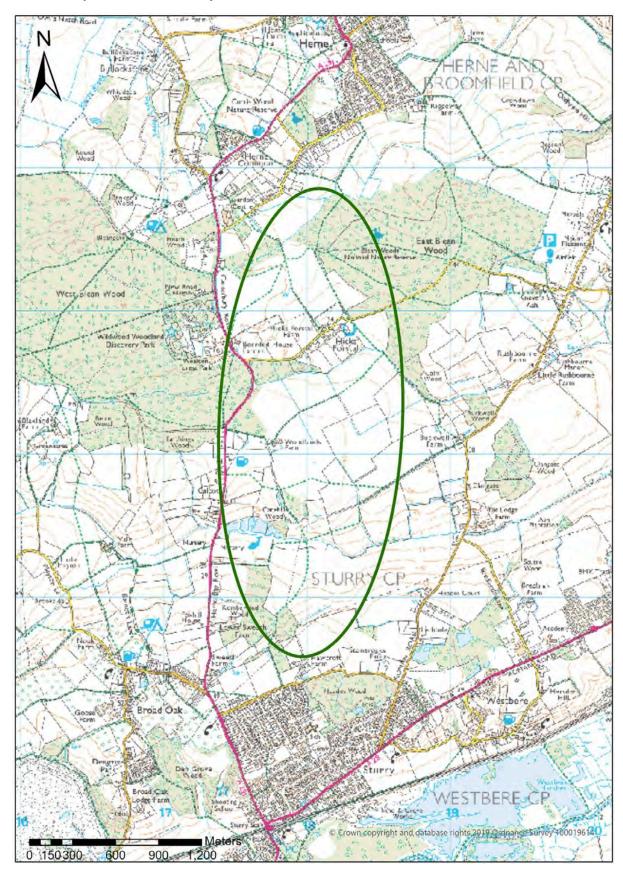


Figure C.2: Area of search between Sturry and Herne

**Step 1: Technical Assessment** 

Green gap between	Sturry and Herne
Description	Large area which includes residential and commercial properties some of which are Listed Buildings, agricultural land and woodland.
Existing settlement identity and pattern	Sturry Sturry is a Rural Service Hub which is densely built up. There is an existing Green Gap to the north-west between Sturry and Broad Oak.
	Herne Herne Common is a Village while Herne is part of Whitstable Urban Area. Herne Common is mainly long housing plots fronting the main road, and Herne is built up with several large open spaces at Cherry Orchard Playing Fields and Herne Bay cemetery. Contains Herne Conservation Area.
	Hoath, Rushbourne and Tile Lodge Conservation Area is within close proximity to the east of the area of search.
Landscape character	Sturry is within F3: Hersden Ridge Landscape Character Area. Herne Common is within E1: Herne Common Landscape Character Area. Herne is within the Herne Bay Urban Area and does not have a Landscape Character.
	The Area of search also includes E2: Sarre Penn Valley and H2: Hoath Farmlands Landscape Character Areas.
	Blean Complex SAC, East Blean Woods SSSI, Blean Woods NNR, Little Hall and Kemberland Woods and Pasture LWS, Ancient Woodland, Priority Habitats and accessible open space are within the area of search.
	The main two land uses are agriculture and woodland. The area of search includes multiple existing buildings which are dispersed.
Visual Character	Mainly open agricultural fields sloping northwards to the coast which can offer long distance views. The large areas of woodland and topography can limit the views so intervisibility between the two settlements is limited.
Any planning permissions or Local Plan policy	The Green Gap between Sturry and Broad Oak already exists in part of this location.

conflicts	The area would have to reflect the settlement boundaries and proposed allocation <i>Policy R9 - Land north of Popes Lane</i> in the draft Local Plan.
Gap extent (area of search)	Distance between Sturry and Herne is in excess of 3,500m and the area of search is circa. 720ha.
Boundary Defensible	The boundary would have to exclude proposed allocation <b>Policy R9 - Land north of Popes Lane</b> in the draft Local Plan. Due to the large area of search it would be challenging to define an eastern boundary.
Potential for enhancement	There could be potential opportunities for enhancement although this could be limited due to the existing high level designations in the area of search.
Outcome	The areas of search between Sturry and Herne, based on this technical assessment, would be considered as a potential <b>weak</b> green gap.
	The area between the two settlements is too vast. Boundary is not necessarily defensible to the east. Area of search contains dispersed existing development. Large areas of the site are already protected with high level designations such as SAC and SSSI.

Due to the unsuitability of the site area as concluded through the technical assessment, this site was not considered appropriate for further assessment.

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#### **Green Gap between Canterbury and Chartham**

Figure C.3: Area of search between Canterbury (Thanington) and Chartham

The study area 'between Canterbury and Chartham' has been amended following the changes to the Draft Local Plan (2024) following the previous Regulation 18 draft Local Plan consultation in October 2022. Since this consultation the previously proposed draft allocationsites 'Land at the west of Rattington Street' and 'Milton Manor Concrete Batching Plant' have been removed from the Local Plan. This removed the pressure of coalescence from the previous study area assessed. It was however considered appropriate to still assess the area between the two settlements in light of the allocation, 'Milton Manor House'. Due to the study area being amended, the technical assessment of the area 'between Canterbury and Chartham' has also been amended to reflect this.

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**Step 1: Technical Assessment** 

Green gap between	Canterbury (Thanington) and Chartham
Description	Mainly agricultural land with some woodland clusters. Agricultural and residential buildings dispersed and wastewater treatment works. Contains Milton Manor Concrete Batching Plant (note there is a condition on the existing planning permission requiring it to be returned to its

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	previous natural state). Railway line and River Stour along the northern boundary of the search area. Two large building sites adjacent to Thanington.
Existing settlement identity and pattern	Chartham Chartham is a Rural Service Centre. The northern half is Chartham Conservation Area and includes Listed and Locally Listed buildings. This area is mainly road fronting development along the main roads through the settlement. The southern half is newer and the area to the east of Cockering Road has a housing estate layout.
	Thanington Thanington is part of Canterbury Urban Area. The area of Thanington closest to Chartham is allocated and being built out as strategic sites from the 2017 Local Plan. As the area is new the identity and pattern is still being developed through planning applications.
Landscape character	Thanington is part of the Canterbury Urban Area and H4: Nackington Farmlands Landscape Character Area. The part covered by a Landscape Character Area has allocations for development.
	The middle section of Chartham and the area of search F1: Stour Valley Sides Landscape Character Area. The northern part of Chartham and the area of search is F7: Stour Valley West Landscape Character Area. The south and east of Chartham is I3: Chartham and Shalmsford Downland Landscape Character Area.
	Great Stour, Ashford to Fordwich Local Wildlife Site, Priority Habitat and accessible open space are within the area of search.
	The main land use is agriculture with clear field boundaries (several with hedgerows). The area of search includes limited dispersed existing buildings.
Visual Character	Land to the north of Cockering Road is open on a valley edge providing long distance views in all directions. Intervisibility is likely to increase once the saved allocation (Site 11 Land at and adjacent to Cockering Farm) has built out on the south and south-west of Thanington. To the south of the search area Larkey Woods acts as a natural barrier reducing long distance views between the settlements.

Any planning permissions or Local Plan policy conflicts	The area would have to reflect the settlement boundaries within the draft Local Plan, saved 2017 Local Plan strategic Site 11 Land at and adjacent to Cockering Farm, Thanington, and proposed allocations Policy C7 - Land to the North of Hollow Lane, Policy C9 - Milton Manor House and Policy C10 - Land to North of Cockering Road in the draft Local Plan.
Gap extent	The area of search is circa. 100ha and there is about 2,200m between the two settlements. However, if the allocations are taken into consideration this reduces to 1,500m.
Boundary Defensible	Cockering Road and Milton Manor Road could both act as part of a defensible boundary as well as the railway which runs south of the A28.
Potential for enhancement	There could be potential opportunities for enhancement.
Outcome	The areas of search between Canterbury and Chartham, based on this technical assessment, would be considered as a potential <b>strong</b> green gap.

# Step 2: Planning and Local Plan suitability assessment

Where do Canterbury and Chartham sit within the settlement hierarchy?

Canterbury	Canterbury is an Urban Area in the settlement hierarchy
Chartham	Chartham is a Rural Service Centre in the settlement hierarchy
Suitability in light of settlement hierarchy	In consideration of the settlement hierarchy, the study area between Canterbury and Chartham would be <b>suitable</b> as a green gap.

How suitable is the study area in consideration of the proposed development allocations within the draft Local Plan?

Canterbury	Within South West Canterbury, abutting the study area to the east, is the draft Local Plan site allocation Policy C9 'Milton Manor House'.
Chartham	There is no development proposed in Chartham that sits directly adjacent to the settlement boundary and study area.
Suitability in light of site allocations	Due to the proposed development within draft Policy C9, the study area between Canterbury and Chartham would be <b>suitable</b> as a

green gap.

#### **Step 3: Green Gap boundary**

The map below highlights the green gap extent as seen appropriate in response to the technical assessment criteria, settlement boundaries and proposed development. The map outlines the boundary for a strong green gap which protects the character of each settlement and prevents coalescence.

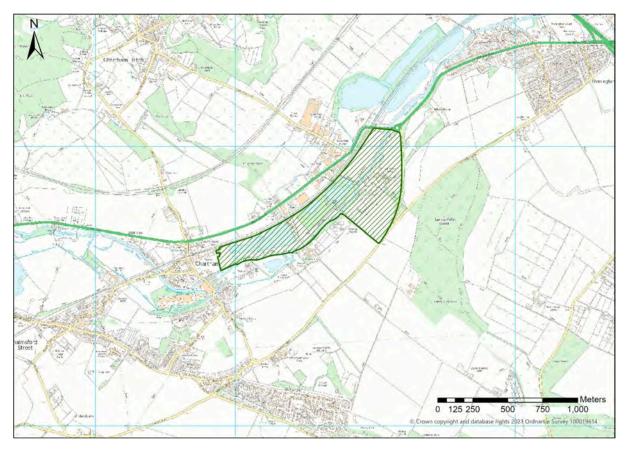


Figure C.4: Proposed Green Gap between Canterbury and Chartham

# **Green Gap between Harbledown and Canterbury**

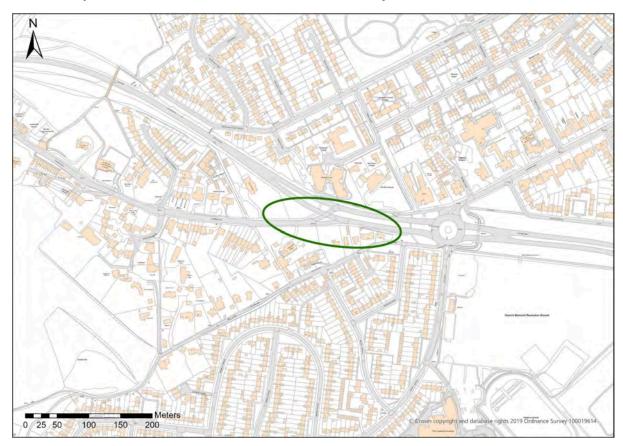


Figure C.5: Area of search between Harbledown and Canterbury

**Step 1: Technical Assessment** 

Green gap between	Harbledown and Canterbury
Description	There is no green space between Harbledown and Canterbury. The two have already started to coalesce.
Existing settlement identity and pattern	Harbledown Harbledown is a Local Service Centre with most of the development adjacent to the Canterbury Urban Area. Further west through the settlement it changes to road facing development only. Includes part of Harbledown Conservation Area.  Canterbury The identity of this section of Canterbury urban area is densely built up with a housing estate type layout.
Landscape character	Urban area with no green space separating the two settlements.

Visual Character	N/A as the two settlements have started to coalesce.
Any planning permissions or Local Plan policy conflicts	No green gap between the two settlement boundaries.
Gap extent	N/A
Boundary Defensible	No clear distinction between the two settlements.
Potential for enhancement	N/A
Outcome	The areas of search between Harbledown and Canterbury, based on this technical assessment, would be considered as a potential <b>weak</b> green gap.
	No clear green gap space between the two settlements.

Due to the unsuitability of the site area as concluded through the technical assessment, this site was not considered appropriate for further assessment.

# **Green Gap between Canterbury and Fordwich**

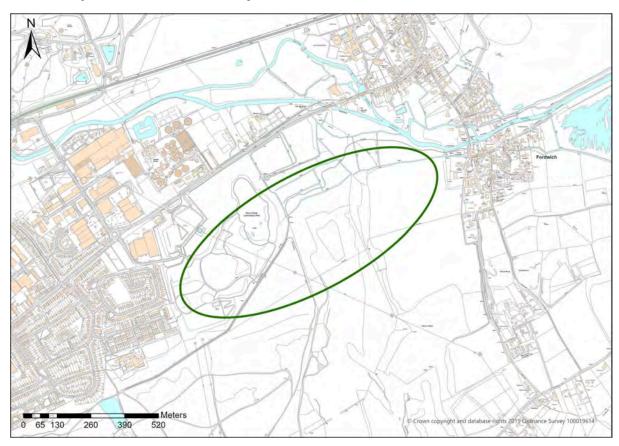


Figure C.6: Area of search between Canterbury and Fordwich

**Step 1: Technical Assessment** 

Green gap between	Canterbury and Fordwich
Description	Includes Sturry Road Community Park, agricultural fields, woodland, Canterbury Golf Course and the River Stour.
Existing settlement identity and pattern	Canterbury The identity of this section of Canterbury urban area is a densely built residential area with large-scale commercial buildings to the north.  Fordwich Fordwich is a Village within the Fordwich Conservation Area. It is a small settlement to the south of the River Stour.
Landscape character	Fordwich and the area of search is covered by F6: Stour Valley - Sturry and Fordwich, G1: Old Park and G2: Trenley Park Woodlands Landscape Character Areas.  Canterbury is an urban area and does not have a Landscape

	<u>,                                      </u>
	Character Area.
	The area of search includes Great Stour, Ashford to Fordwich LWS, Priority Habitat and Open Space. As well as being adjacent to Chequers Wood & Old Park SSSI and Ancient Woodland.
	The main land uses are the community park, green fields and woodland.
Visual Character	Certain areas are open with long distance views. However intervisibility is likely to be restricted by trees.
Any planning permissions or Local Plan policy conflicts	Policy T6 which safeguards land for an expansion of Sturry Park and Ride in the 2017 Local Plan (and is a saved policy for the draft Local Plan) is within this area. The draft Local Plan allocates and safeguards land in the area of search for potential strategic wetlands as part of the Canterbury District Nutrient Mitigation Strategy ( <i>Policy C20-Land to the south of Sturry Road</i> and <i>Policy DS17 - Habitats of international importance</i> in the draft Local Plan). Play areas and semi/natural open spaces are within the area and protected through the draft Open Space Strategy and on the draft Local Plan policies map under <i>Policy DS24 - Publicly accessible open space and sports</i> .
Gap extent	Distance between Canterbury and Forwich is around 1,150m and the area of search is circa. 67ha.
Boundary Defensible	Due to the landscape and existing natural features it would be challenging to define a southern boundary.
Potential for enhancement	Enhancement opportunities will be limited as part of the site is LWS. The majority of the rest of the area of search is open space included within the draft Open Space Strategy and any enhancement opportunities should be considered through the strategy and associated action plan.
Outcome	The areas of search between Canterbury and Fordwich, based on this technical assessment, would be considered as a potential <b>weak</b> green gap.
	Boundary is not necessarily defensible to the south. Area of search contains a designation in the draft Local Plan. The safeguarded and allocated wetland will have secondary benefits like providing a natural separation.

Due to the unsuitability of the site area as concluded through the technical assessment, this site was not considered appropriate for further assessment.	

## **Green Gap between Lower Herne and Canterbury**

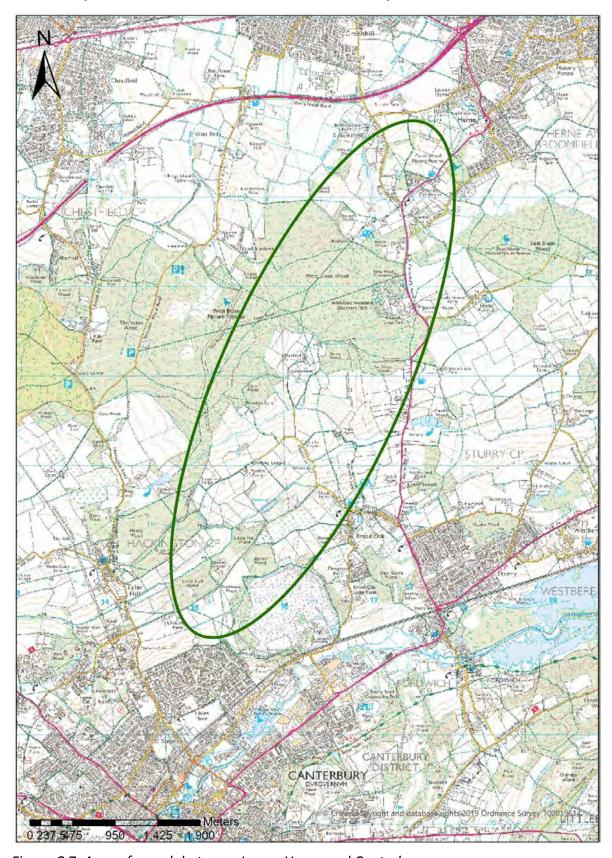


Figure C.7: Area of search between Lower Herne and Canterbury

**Step 1: Technical Assessment** 

Green gap between	Lower Herne and Canterbury
Description	Large area which includes residential and commercial properties some of which are Listed Buildings, landfill, agricultural land and woodland.
Existing settlement identity and pattern	Canterbury The identity of this section of Canterbury urban area is a densely built residential area.
	Herne Herne Common is a Village while Lower Herne is part of Whitstable Urban Area. Herne Common is mainly long housing plots fronting the main road, and Herne is built up with several large open spaces at Cherry Orchard Playing Fields and Herne Bay cemetery. Contains Herne Conservation Area.
	Tyler Hill Conservation Area and Allcroft Grange (Hackington) Conservation Area are within the area of search.
Landscape character	Herne Common is within E1: Herne Common Landscape Character Area. Part of Lower Herne is in C1: Chestfield Gap and Greenhill Landscape Character Area. Herne and most of Lower Herne is within the Herne Bay Urban Area, and Canterbury is an urban area so they do not have a Landscape Character.
	The Area of search also includes D2: Thornden, E2: Sarre Penn Valley and F2: Stour Valley Slopes Landscape Character Areas.
	West Blean & Thornden Woods SSSI, East Blean Woods SSSI, Blean Woods NNR, Curtis Wood LNR, Little Hall and Kemberland Woods and Pasture LWS, Ancient Woodland, Priority Habitats and accessible open space are within the area of search.
	The main two land uses are agriculture and woodland. The area of search includes multiple existing buildings and a landfill.
Visual Character	To the south it is mainly open agricultural fields sloping northwards to the coast which can offer long distance views. However, to the north the Blean Woods are large areas of

	woodland which along with topography can limit the views so intervisibility between the two settlements is limited.
Any planning permissions or Local Plan policy conflicts	The area would have to reflect the settlement boundaries within the draft Local Plan, saved allocation Site 5 Strode Farm, Herne Bay in the 2017 Local Plan and proposed allocations Policy R14 - Land at Goose Farm, Shalloak Road, Policy R16 - Land fronting Mayton Lane and Policy R17 - Broad Oak Reservoir and Country Park in the draft Local Plan.
Gap extent (area of search)	Distance between Canterbury and Lower Herne is in excess of 6,000m and the area of search is more than 1,000ha.
Boundary Defensible	The boundary would have to exclude proposed allocations  Policy R14 - Land at Goose Farm, Shalloak Road, Policy R16 - Land fronting Mayton Lane and Policy R17 - Broad Oak  Reservoir and Country Park in the draft Local Plan.  Due to the large area of search it would be challenging to define an eastern or western boundary, and the northern boundary would be challenging as Herne Common is between Lower Herne and Canterbury.
Potential for enhancement	There could be potential opportunities for enhancement although this could be limited due to the existing high level designations in the area of search.
Outcome	The areas of search between Lower Herne and Canterbury, based on this technical assessment, would be considered as a potential <b>weak</b> green gap.
	The area between the two settlements is too vast. Boundary is not necessarily defensible to the north, east or west. Area of search contains dispersed existing development. Large areas of the site are already protected with high level designations such as SSSI, NNR and LNR.

Due to the unsuitability of the site area as concluded through the technical assessment, this site was not considered appropriate for further assessment.

# **Green Gap between Radfall and Whitstable**

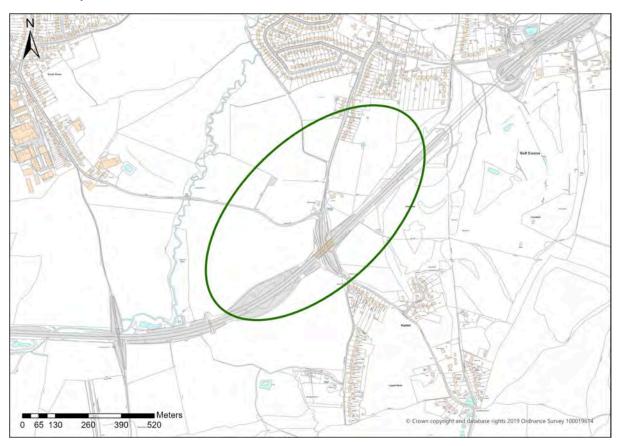


Figure C.8: Area of search between Radfall and Whitstable (Chestfield)

**Step 1: Technical Assessment** 

Green gap between	Radfall and Whitstable (Chestfield)
Description	Thanet Way (A299) separates the two settlements. The Chestfield Golf Course is within and adjacent to the east of the area of search. Residential properties. Agricultural fields with mature tree belts and small parcels of trees. Radfall Recreation Ground to the north adjacent to Chestfield.
Existing settlement identity and pattern	Radfall Radfall is a Hamlet. It is formed by three small clusters of road facing development.  Chestfield Chestfield is part of Whitstable. This area is built up with
	several large open spaces at Chestfield Golf Course, Radfall Recreation Ground and Chestfield Cricket Ground. Part of Chestfield is covered by Chestfield Conservation Area.
Landscape character	Radfall and the area of search are within C2: Chestfield

	Farmland Landscape Character Area. Chestfield is within the Whitstable Urban Area and does not have a Landscape Character.
	Ancient Woodland, Priority Habitats and accessible open space are within the area of search.
	There are several land uses including recreation grounds, golf course, agriculture and woodland. The area of search includes some existing buildings to the north of the Thanet Way.
Visual Character	Mostly open fields with long distance views. Tree belt around the golf course restricts views.
Any planning permissions or Local Plan policy conflicts	The area would have to reflect the Urban Area of Whitstable and proposed allocation <i>Policy W4 - Land at Brooklands Farm</i> in the draft Local Plan.
Gap extent	The area of search is circa. 70ha and there is about 550m between the two settlements. However, if the allocation is taken into consideration this reduces to 200m.
Boundary Defensible	The Thanet Way, Chestfield Golf Course and Whitstable Urban Area could provide a defensible boundary.
Potential for enhancement	There could be potential opportunities for enhancement.
Outcome	The areas of search between Radfall and Whitstable, based on this technical assessment, would be considered as a potential <b>strong</b> green gap.

### Step 2: Planning and Local Plan suitability assessment

Where do Radfall and Whitstable sit within the settlement hierarchy?

Radfall	Radfall is an Hamlet in the settlement hierarchy
Whitstable	Whitstable is an Urban Area in the settlement hierarchy
Suitability in light of settlement hierarchy	In consideration of the settlement hierarchy, the study area between Radfall and Whitstable would be <b>suitable</b> as a green gap.

How suitable is the study area in consideration of the proposed development allocations within the draft Local Plan?

Radfall	There is no development proposed in Radfall that sits directly adjacent to the settlement boundary and study area.
Whitstable	To the south of Whitstable, abuttingthe study area to the north, is the draft Local Plan site allocation Policy W4 'Land at Brooklands Farm'.
Suitability in light of site allocations	Due to the proposed development within draft Policy W4, the study area between Radfall and Whitstable would be suitable as a green gap.

#### **Step 3: Green Gap boundary**

The map below highlights the green gap extent as seen as appropriate in response to the technical assessment criteria, settlement boundaries and proposed development. The map outlines the boundary for a strong green gap which protects the character of each settlement and prevents coalescence.

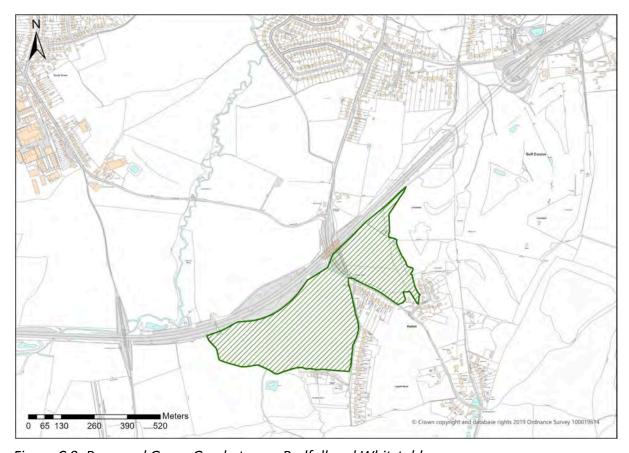


Figure C.9: Proposed Green Gap between Radfall and Whitstable

# **Green Gap between Fordwich and Sturry**

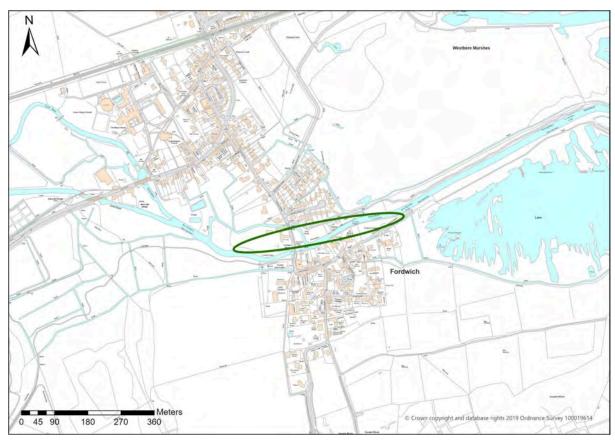


Figure C.10: Area of search between Fordwich and Sturry

## **Step 1: Technical Assessment**

Green gap between	Fordwich and Sturry
Description	River Stour and boat landing areas, allotments, a couple of Listed Buildings, green spaces and trees.
Existing settlement identity and pattern	Fordwich Fordwich is a Village within the Fordwich Conservation Area. It is a small settlement to the south of the River Stour.  Sturry Sturry is a Rural Service Hub within the Sturry Conservation Area, and it is densely built up.
Landscape character	Sturry and the area of search are within F6: Stour Valley - Sturry and Fordwich Landscape Character Area. Fordwich is within G1: Old Park and G2: Trenley Park Woodlands Landscape Character Areas.  Stodmarsh SPA and SAC, Great Stour, Ashford to Fordwich

	LWS, Priority Habitat and accessible open space are within the area of search.  The main land uses are green space and the river stour. The area of search includes a few existing buildings.
Visual Character	Views along the river corridor. Long distance views are limited due to the amount of buildings, and there is intervisibility between the settlements.
Any planning permissions or Local Plan policy conflicts	The area would have to reflect the settlement boundaries within the draft Local Plan.
Gap extent	The area of search is circa. 20ha and there is about 75m between the two settlements.
Boundary Defensible	The settlement boundary for Sturry (within the draft Local Plan) provides a clear north boundary. The built form of Fordwich provides a southern boundary. Existing residential and allotment plots provide boundaries to the east and west.
Potential for enhancement	There could be potential opportunities for enhancement, especially along the river corridor.
Outcome	The areas of search between Fordwich and Sturry, based on this technical assessment, would be considered as a potential <b>strong</b> green gap.

## Step 2: Planning and Local Plan suitability assessment

Where do Fordwich and Sturry sit within the settlement hierarchy?

Fordwich	Fordwich is a Village in the settlement hierarchy
Sturry	Sturry is a Rural Service Centre in the settlement hierarchy
Suitability in light of settlement hierarchy	In consideration of the settlement hierarchy, the study area between Fordwich and Sturry would be <b>suitable</b> as a green gap.

How suitable is the study area in consideration of the proposed development allocations within the draft Local Plan?

Fordwich	There is no development proposed in Fordwich that sites directly adjacent to the settlement boundary and site area.
Sturry	There is no development proposed in Sturry that sits directly adjacent to the settlement boundary and the study area.
Suitability in light of site allocations	Due to no development proposed adjacent to the settlement boundaries abutting the study area, the study area between Fordwich and Sturry would be <b>unsuitable</b> as a green gap.

Due to the unsuitability of the site area as concluded through the proposed development assessment, this site was not considered appropriate to designate as a green gap.

# **Green Gap between Hersden and Westbere**

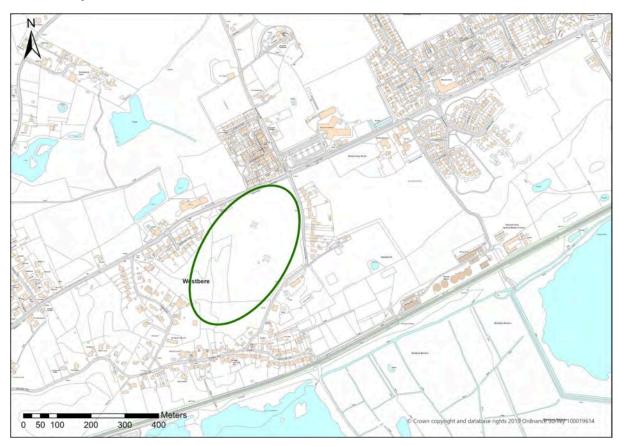


Figure C.12: Area of search between Hersden and Westbere

**Step 1: Technical Assessment** 

Green gap between	Hersden and Westbere
Description	Mainly a large open greenfield with trees in the southern and western parts of the area.
Existing settlement identity and pattern	Hersden Historically Hersden was a small, densely developed settlement to the north of the A28. Development is now underway, has planning permission or is allocated to extend the settlement both sites of the A28. These areas are new so the identity and pattern is still being developed through planning applications. Hersden is a Rural Service Centre.  Westbere Westbere is a Local Service Centre with development predominantly facing the main road through the settlement. The settlement of Westbere is covered by Westbere No.1 Conservation Area and Westbere No.2 Conservation Area.

Landscape character	Hersden, Westbere and the area of search are all within F3: Hersden Ridge Landscape Character Area.
	There is a Priority Habitat within the area of search.
	The main land use is a large field with a woodland parcel to the south and west.
	There is an existing green gap to the north of the site, 'between Sturry and Hersden', a green gap within the study area would be working alongside this.
Visual Character	Large open field with views which are slightly limited by the trees to the south and west and existing development.
Any planning permissions or Local Plan policy conflicts	The area would have to reflect the settlement boundaries within the draft Local Plan, which would then take account of the new development (Hoplands and Chislet Colliery) and proposed allocation ( <i>Policy R5 - Bread and Cheese Field</i> in the draft Local Plan) in Hersden.
Gap extent	Circa 11.8h and around 290m between the two settlements.
Boundary Defensible	Settlement boundaries in the draft Local Plan could be used as these are based on roads and property boundaries. Island Road could be used to the north and Bushy Hill Road could be used to the east.
Potential for enhancement	There could be potential opportunities for enhancement.
Outcome	The areas of search between Hersden and Westbere, based on this technical assessment, would be considered as a potential <b>strong</b> green gap.

## Step 2: Planning and Local Plan suitability assessment

Where do Hersden and Westbere sit within the settlement hierarchy?

Hersden	Hersden is a Rural Service Centre in the settlement hierarchy
Westbere	Westbere is a Local Service Centre in the settlement hierarchy
Suitability in light of settlement hierarchy	In consideration of the settlement hierarchy, the study area between Hersden and Westbere would be <b>suitable</b> as a green gap.

How suitable is the study area in consideration of the proposed development allocations within the draft Local Plan?

Hersden	Within the west of Hersden, abutting the study area to the north east, is the draft Local Plan site allocation Policy R5 'Bread and Cheese Field'.
Westbere	There is no development proposed in Westbere that sits directly adjacent to the settlement boundary and study area.
Suitability in light of site allocations	Due to the proposed development within draft Policy R5, the study area between Hersden and Westbere would be <b>suitable</b> as a green gap.

#### **Step 3: Green Gap boundary**

The map below highlights the green gap extent as seen appropriate in response to the technical assessment criteria, settlement boundaries and proposed development. The map outlines the boundary for a strong green gap which protects the character of each settlement and prevents coalescence.

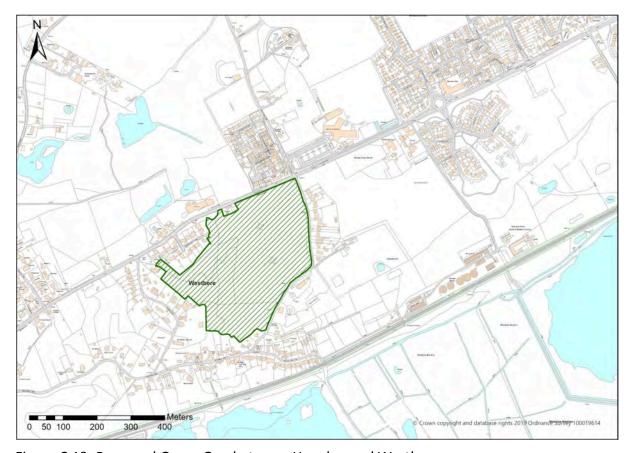


Figure C.13: Proposed Green Gap between Hersden and Westbere

## **Green Gap between Upstreet and Hersden**

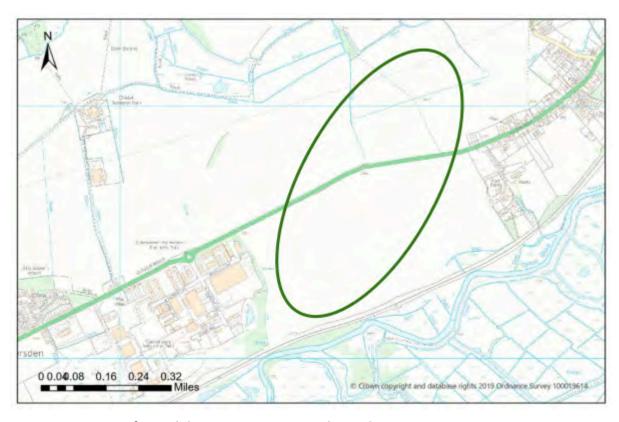


Figure C.14: Area of search between Upstreet and Hersden

**Step 1: Technical Assessment** 

Green gap between	Upstreet and Hersden
Description	Agricultural land between Upstreet and Hersden along Island Road. The area is open greenspace with minimal tree cover.
Existing settlement identity and pattern	Upstreet A small linear residential village running along Island Road. Upstreet is a relatively isolated village to the south of Chislet, north of the Great Stour. The south eastern part of upstreet falls within the Upstreet Conservation Area.  Hersden A Rural Service Centre to the north east of Westbere. Hersden is largely residential to the north of Island Road however has an industrial estate to the east, south of Island Road.

Landscape character	The area to the north of Island Road covers Landscape Character Area H2: Hoath Farmlands. The area to the south covers Landscape area F3: Hersden Ridge. Both Upstreet and Hersden fall within Hersden Ridge Landscape Character Areas.
Visual Character	Large open fields with long distance view to the north and south. Island Road is partly lined with trees and hedgerows. The field to the north of Island Road has an island of forestry interrupting the longer distance views from the south, northwards. Overall the views are largely interrupted and the fields are mostly flat and open.
Any planning permissions or Local Plan policy conflicts	The area would have to reflect the settlement boundaries within the draft Local Plan.
Gap extent	Distance between Upstreet and Hersden is around 966.5m and the area of search is circa
Boundary Defensible	The two agricultural field boundaries to the north east of Hersden and the north west of Upstreet would act as a natural defensible boundary to the north, however this creates a large natural boundary. The train line running along the south would also act as a natural defensible boundary.
Potential for enhancement	There could be potential opportunities for enhancement.
Outcome	The areas of search between Upstreet and Hersden, based on this technical assessment, would be considered as a potential <b>strong</b> green gap.

### Step 2: Planning and Local Plan suitability assessment

Where do Upstreet and Hersden sit within the settlement hierarchy?

Upstreet	Upstreet is a Village in the settlement hierarchy
Hersden	Hersden is a Rural Service Centre in the settlement hierarchy
Suitability in light of settlement hierarchy	In consideration of the settlement hierarchy, the study area between Upstreet and Hersden would be <b>suitable</b> as a green gap.

How suitable is the study area in consideration of the proposed development allocations within the draft Local Plan?

Upstreet	There is no development proposed in Upstreet that sits directly adjacent to the settlement boundary and study area.
Hersden	There is no development proposed in Hersden that sits directly adjacent to the settlement boundary and study area.
Suitability in light of site allocations	Due to no development proposed adjacent to the settlement boundaries abutting the study area, the study area between Upstreet and Hersden would be <b>unsuitable</b> as a green gap.

Due to the unsuitability of the site area as concluded through the proposed development assessment, this site was not considered appropriate to designate as a green gap.

# **Green Gap between Maypole and Hoath**

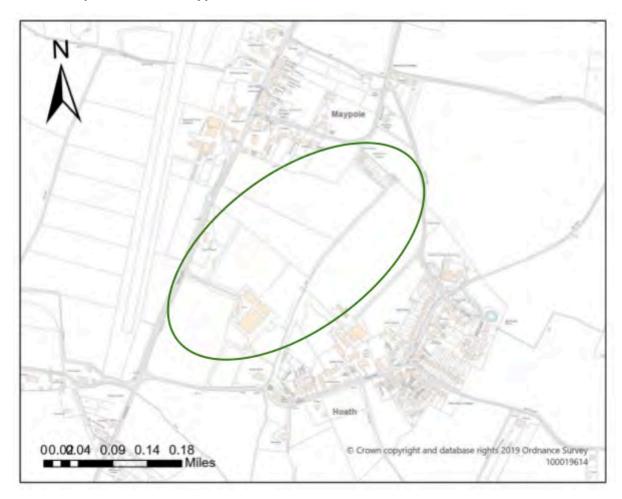


Figure C.15: Area of search between Maypole and Hoath

**Step 1: Technical Assessment** 

Green gap between	Maypole and Hoath
Description	A group of agricultural open fields which cover a few dwellings and some stables. There is a public right of way which crosses through the centre of the site from Maypole Road to Church Road which runs through Hoath.
Existing settlement identity and pattern	Maypole Maypole is a small, low density village in Maypole and Oldtree Conservation Area. The village is mostly residential with a few commercial uses to the south of the village, west of Maypole Road.  Hoath Hoath is a Local Service Centre within Hoath, Rushbourne and Tile Lodge Conservation Area. Hoath runs along Church

	Road and extends south eastern down Marley Lane slightly.	
Landscape character	The area of search falls within the Landscape Character Area H2: Hoath Farmlands and part of the south of the site would fall within Hoath, Rushbourne and Tile Lodge Conservation Area. The site abuts an Area of High Landscape Value - Blean Woods to the west. The land is largely agricultural or in use as horse paddocks with stables.	
Visual Character	The study area includes large open agricultural fields. The field to the east of the site, is divided to the west with a row of trees along the field boundary, limiting views. The view of the study area from the west is limited due to the site being lined with hedgerows. The site does however sit adjacent to the Blean Woods area of High Landscape Value. There is clear visual separation between Maypole and Hoath.	
Any planning permissions or Local Plan policy conflicts	There are no planning permissions currently proposed within the area. The green gap would however have to exclude the proposed allocation <i>Policy R27 - Land at Church Farm</i> in the draft Local Plan which is allocated for residential development to the north of Hoath.	
Gap extent	Distance between Maypole and Hoath is 255m and the area of search is circa. 17ha however if the allocations are taken into consideration, this reduces to 16ha.	
Boundary Defensible	The boundary would have to exclude proposed allocation <i>Policy R27 - Land at Church Farm</i> in the draft Local Plan. A north boundary would be easy to determine, following the boundary between the residential dwellings to the south of Maypole, and the field to the north of the area of search. School Lane and Maypole Road could provide defensible boundaries however the boundary to the south may be harder to determine depending on what it included/excluded from the green gap.	
Potential for enhancement	There could be potential opportunities for enhancement.	
Outcome	The areas of search between Maypole and Hoath, based on this technical assessment, would be considered as a potential <b>strong</b> green gap.	

Step 2: Planning and Local Plan suitability assessment

Where do Maypole and Hoath sit within the settlement hierarchy?

Maypole	Maypole is a Village in the settlement hierarchy
Hoath	Hoath is a Local Service Centre in the settlement hierarchy
Suitability in light of settlement hierarchy	In consideration of the settlement hierarchy, the study area between Maypole and Hoath would be <b>unsuitable</b> as a green gap.

Due to the unsuitability of the site area in its assessment against the settlement hierarchy, this site was not considered appropriate for further assessment against the proposed development sites within the Local Plan.

# **Appendix D: Local Green Space site assessment**

# Wincheap Meadow, Canterbury



Figure D.1: Aerial photograph of Wincheap Meadow, Canterbury

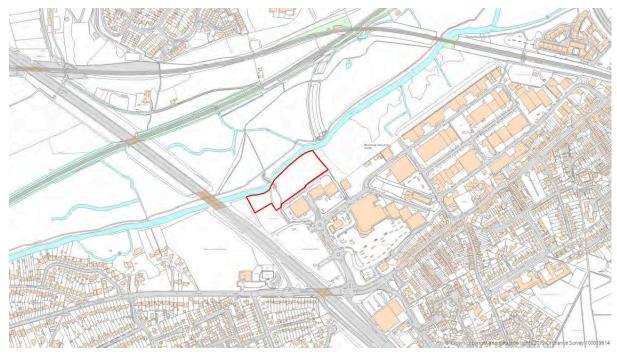


Figure D.2: Map showing the proposed Local Green Space at Wincheap Meadow, Canterbury



Figure D.3: View north to south along the cycle/pedestrian path through the site



Figure D.4: View of green area to the east of the path



Figure D.5: View across the River Stour to the green area to the east of the path

Site	Wincheap Meadow	
SLAA number	SLAA139	
Size	1.4 ha	
Site Description	The site contains mature trees to the west with a cycle / pedestrian route running north to south through the site. To the east is a green area which is overgrown and untamed with stinging nettles and other scrubs. There are some mature trees around the outskirts. The River Stour is along the northern edge.  Unable to access the green area to the east, so views out of the site are limited from the path by mature trees and vegetation.  The cycle / pedestrian (Ten Perch Road Cycleway) is the only access. It connects to the Ten Perch Road and The Boundary roundabout to the south, and across the River Stour to Whitehall Meadows to the North. Whitehall Meadows has multiple access points.	
Local Plan 2017 allocations	<ul> <li>Great Stour, Ashford to Fordwich Local Wildlife Site</li> <li>Wincheap Park and Ride Safeguarding Area (T5)</li> <li>Canterbury City Area of High Landscape Value</li> <li>Flood Zone 2 and 3</li> </ul>	
Recent planning applications	CA//18/02551   Proposed extension to existing park and ride facility to provide an additional 228 parking spaces, replacement terminal building, reconfiguration to access, together with fencing, lighting, landscaping and cycle storage.   Withdrawn February 2023	
Ownership: Who owns the site? Is this the same as who has submitted the site as a SLAA?	Council owned.  Submitted to Call for Sites by a third party.	
Assessment		
Can the area endure beyond the Local Plan period? Why?	Uncertain. The site is designated for a Park and Ride in the adopted 2017 Local Plan. Park and Ride is unlikely to be built and the planning application was withdrawn following the permission being revoked in October 2020. In the draft Local Plan, the site is allocated to be safeguarded as a potential wetland associated with the nutrient neutrality issues. Future plans for the site are currently being considered by the council.	

	,	
Is it in close proximity (within 400m) to the community it would serve?	Yes, the site is on the edge of the urban area.	
Does the site have local significance?	There is no specific formal community group, but some interest from people who are part of other open space friends groups.	
<ul> <li>Is it well used by a wide range of people from the community?</li> <li>Is it a multi use space?</li> <li>Is it currently publicly</li> </ul>	The path through the site provides a connection between Wincheap Industrial Estate and the rest of Great Stour, Ashford to Fordwich Local Wildlife Site.  However, the rest of the site (the green space to the east) is not	
accessible?	currently accessible, usable, nor a multi-use space.	
- Is it beautiful? (attractive with high visual amenity)	Yes, although limited due to vegetation growth.	
- Does it have historic significance?	Limited.	
- Does it have recreation value? (formally or informally)	Yes, although minimal the only recreation value is as a walking path linking the Wincheap area to the Hambrook Marshes and beyond.	
- Is it tranquil?	No, the site is in close proximity to the A2 and Wincheap industrial so there are traffic noises, and a railway line to the north.	
- Does the site have wildlife / biodiversity value?	Yes, the site is a protected Local Nature Reserve and Local Wildlife Site.	
Is the site local in character? (not extensive)	Yes, the site is relatively small.	
Recommendations		
Recommendation: Should it be designated as a Local Green Space or not? Why?	No, the site is currently safeguarded for an alternative use (wetland associated with the nutrient neutrality issues) and access is only available as a route through the site, not around the site.  Therefore, the site is not currently capable of enduring as a Local Green Space beyond the end of the plan period or being fully publicly accessible (paragraph 106 of the NPPF).  The site is also protected by more significant designations such as a Local Nature Reserve, Local Wildlife Site and Flood Zone 2 and 3.	

# **Appendix E: Protected Open Space assessment - Phase 1**

## Whitstable



Figure E.1: Protected Open Space in Whitstable

Table E.1: Phase 1 review of Protected Open Space in Whitstable

ID	Site name / Location	Phase 1 outcome
138	Land between Brook Road and Long Rock	Within the Open Space Strategy
139	Land read of 55-63 Joy Lane	Within the Open Space Strategy
140	Whitstable & Seasalter Golf Club	Within the Playing Pitch Strategy
141	Thanet Way (west of The Oyster Bed)	Part within the Open Space Strategy and part progressing to Phase 2.
142	Duncan Down	Within the Open Space Strategy
143	Whitstable Castle	Within the Open Space Strategy
144	St Anne's Tennis Courts	Within the Playing Pitch Strategy
145	St Anne's Tennis Courts	Within the Playing Pitch Strategy
146	All Saints Church and surrounding land	Part within the Open Space Strategy and part progressing to Phase 2.

ID	Site name / Location	Phase 1 outcome
147	Mariners View, Seasalter	Within the Open Space Strategy
148	Chestfield Recreation Ground	Within the Open Space Strategy
149	Chestfield Village Green	Within the Open Space Strategy
150	Land adjacent to Reeves Way	Within the Open Space Strategy
151	Westmeads Recreation Ground	Within the Open Space Strategy
152	Island Wall Greenspace	Within the Open Space Strategy
153	Cornwallis Circle Recreation Ground	Within the Open Space Strategy
154	Tankerton Slopes, Whitstable Beach	Within the Open Space Strategy
155	End of Thistle Drive, Seasalter	Within the Open Space Strategy
156	Church Lane, Seasalter	Within the Open Space Strategy
157	Land at Marine Crescent	Within the Open Space Strategy
158	Green Leas, Chestfield	Within the Open Space Strategy
159	Fairlawn, Chestfield	Within the Open Space Strategy
160	Whitstable Beach	Within the Open Space Strategy
161	Whitstable Beach	Within the Open Space Strategy
162	Whitstable Beach	Within the Open Space Strategy
163	Carnoustie Close	Within the Open Space Strategy
164	Whitstable Cemetery	Within the Open Space Strategy
165	Stream Walk allotments	Within the Open Space Strategy
166	New Street/Harbour Street	Within the Open Space Strategy
167	The Old Church, St Alphege, Seasalter	Within the Open Space Strategy
168	Preston Parade, Seasalter	Within the Open Space Strategy
169	Island Wall	Within the Open Space Strategy
170	West Beach Tennis Courts	Within the Playing Pitch Strategy
171	War Memorial, Oxford Street	Within the Open Space Strategy
172	St Anne's Tennis Courts	Within the Playing Pitch Strategy
173	Columbia Avenue	Within the Open Space Strategy
174	Prospect Field	Within the Open Space Strategy
175	Land adjacent to Church Lane / Thanet Way	Within the Open Space Strategy
176	Swalecliffe Community Centre	Part of the site is within the Open Space Strategy. Remainder (building) to progress to Phase 2.

ID	Site name / Location	Phase 1 outcome
177	St John the Baptist's Church, Swalecliffe	Within the Open Space Strategy
178	Swalecliffe Community Primary School	Within the Playing Pitch Strategy
179	Whitstable Rugby Club	Within the Playing Pitch Strategy
180	Chestfield Golf Club	Within the Playing Pitch Strategy
181	Thanet Way (Land south of Bartlett Drive)	Progress to Phase 2
182	Land west of Grasmere Road	Progress to Phase 2
183	Chestfield Cricket Club	Within the Playing Pitch Strategy
184	Land north of Grasmere Road	Progress to Phase 2
185	Land adjacent to Birkdale Close	Within the Open Space Strategy
186	off Deborah Close	Within the Open Space Strategy
187	The Whitstable School	Within the Playing Pitch Strategy
188	The Belmont Ground	Within the Playing Pitch Strategy
189	Land south of Teynham Road	Progress to Phase 2
	Parallel to rear of housing on Clare Road,	
190	Station Road	Within the Open Space Strategy
191	Joy Lane Junior School	Within the Playing Pitch Strategy
192	Land adjacent to Avoca, Seasalter Beach	Progress to Phase 2

## **Herne Bay**



Figure E.2: Protected Open Space in the west of Herne Bay.



Figure E.3: Protected Open Space in the east of Herne Bay.

Table E.2: Phase 1 review of Protected Open Space in Herne Bay

ID	Site name / Location	Phase 1 outcome
97	Pier Avenue/Central Parade	Within the Open Space Strategy
98	End of Montague Street/Oxenden Square	Within the Open Space Strategy
99	Memorial Park	Within the Open Space Strategy
100	Sea Street/Hampton Pier Avenue	Within the Open Space Strategy
101	Herne Bay Pier	Within the Open Space Strategy
102	Land adjacent to Curtis Wood Park Road	Within the Open Space Strategy
103	Cherry Orchard Recreation Ground	Within the Open Space Strategy
104	Herne Bay Cemetery	Within the Open Space Strategy
105	Lane End Gardens	Within the Open Space Strategy
106	Burton Down Park	Within the Open Space Strategy
107	Hampton Pier Avenue	Within the Open Space Strategy
108	Herne Bay Beach, Swalecliffe Avenue	Within the Open Space Strategy
109	Herne Bay Beach	Within the Open Space Strategy
110	St Martin's Church, Herne	Within the Open Space Strategy
111	Hawe Farm Way	Within the Open Space Strategy
112	Ham Shades Lane allotments	Within the Open Space Strategy
113	Cross Street allotments	Within the Open Space Strategy
114	Eddington Lane allotments	Within the Open Space Strategy
115	St George's Terrace, Herne Bay	Within the Open Space Strategy
116	Station Road allotments	Within the Open Space Strategy
117	Station Chine	Within the Open Space Strategy
118	Herne Bay Beach / Reculver Country Park	Within the Open Space Strategy
119	Briary Primary School	Education facility
120	North of Thanet Way	Within the Open Space Strategy
121	Herne CE Junior School	Within the Playing Pitch Strategy
122	Herne Bay Court	Progress to Phase 2
123	Herne Bay High School	Within the Playing Pitch Strategy
124	Land adjacent to The Shingles, Western Esplanade	Progress to Phase 2
125	Hampton Primary School	Within the Playing Pitch Strategy
126	Hampton Primary School	Education facility

ID	Site name / Location	Phase 1 outcome
127	The Circus (Centre)	Within the Open Space Strategy
128	The Circus (Left)	Within the Open Space Strategy
129	The Circus (Right)	Within the Open Space Strategy
130	Land adjacent to Charles Bell Apartments, High Street	Progress to Phase 2
131	off Victoria Road	Within the Open Space Strategy
132	Herne Bay Junior School	Within the Playing Pitch Strategy
133	The Altira Park Stadium	Within the Playing Pitch Strategy
134	Herne Bay Hockey and Lawn Tennis Club	Within the Playing Pitch Strategy
135	St Mary's Church, Reculver	Within the Open Space Strategy
136	Reculver C of E Primary School	Within the Playing Pitch Strategy
137	Land to south of former Herne Bay Golf Course	Progress to Phase 2

# Canterbury

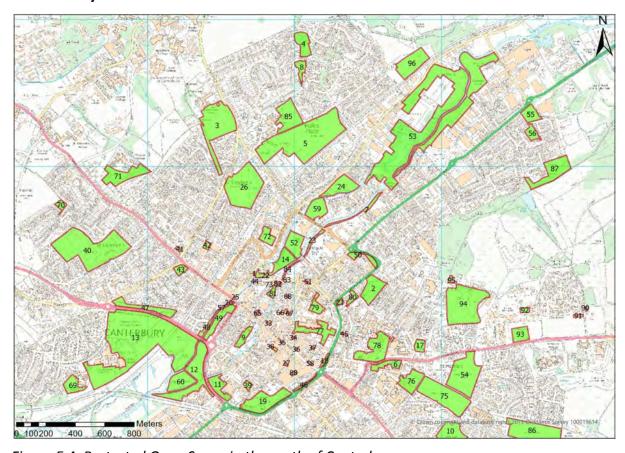


Figure E.4: Protected Open Space in the north of Canterbury

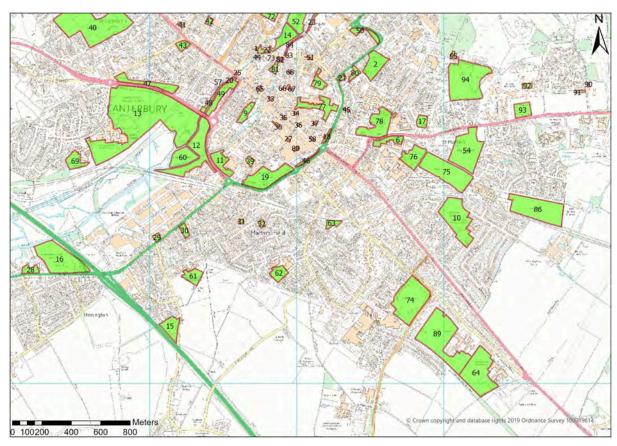


Figure E.5: Protected Open Space in the south of Canterbury

Table E.3: Phase 1 review of Protected Open Space in Canterbury

ID	Site name / Location	Phase 1 outcome
1	North Lane (adjacent to the River Stour)	Within the Open Space Strategy
2	St Gregory's Centre	Within the Open Space Strategy
3	The Archbishops School	Within the Playing Pitch Strategy
4	Land to the east of Green Dell	Within the Open Space Strategy
5	King's School Birley's Playing Fields	Part within the Open Space Strategy and part within the Playing Pitch Strategy
6	Barton Court Grammar School	Education facility
7	Alongside Great Stour (north of Kingsmead Car Park)	Within the Open Space Strategy
8	Land adjacent to Tenterden Drive	Within the Open Space Strategy
9	Greyfriars Garden, Old Watling Street	Within the Open Space Strategy
10	Pilgrims Way Allotments	Within the Open Space Strategy
11	St Mildred's Church, Canterbury	Within the Open Space Strategy
12	Tannery Field, Rheims Way	Within the Open Space Strategy

ID	Site name / Location	Phase 1 outcome
13	Victoria Recreation Ground	Within the Open Space Strategy
14	Bus Company Island	Within the Open Space Strategy
15	Birch Road	Within the Open Space Strategy
16	Thanington Recreation Ground	Within the Open Space Strategy
17	St Martin's Church, Canterbury	Within the Open Space Strategy
18	Lower Bridge Street	Within the Open Space Strategy
19	Dane John Garden	Within the Open Space Strategy
20	Westgate Gardens	Within the Open Space Strategy
21	Former Churchyard, Broad Street	Within the Open Space Strategy
22	Miller Fields	Within the Open Space Strategy
23	Alongside Great Stour (in front of Coach Park)	Within the Open Space Strategy
24	Broad Oak Road allotments	Within the Open Space Strategy
25	Land adjacent to North Lane car park	Within the Open Space Strategy
26	Beverley Meadow	Within the Open Space Strategy
27	Rose Square	Within the Open Space Strategy
28	St Nicholas Church, Thanington	Within the Open Space Strategy
29	Cemetery, Wincheap	Within the Open Space Strategy
30	Wincheap Play Area	Within the Open Space Strategy
31	Martyrs Field Road Gardens	Within the Open Space Strategy
32	Oxford Road	Within the Open Space Strategy
33	Canterbury Three Cities Garden	Within the Open Space Strategy
34	The Canterbury War Memorial	Within the Open Space Strategy
35	High Street Memorial	Within the Open Space Strategy
36	Longmarket Square	Within the Open Space Strategy
37	St. Mary Magdalene's Tower	Within the Open Space Strategy
38	Cemetery, Whitehorse Lane	Within the Open Space Strategy
39	St Mary de Castro	Within the Open Space Strategy
40	Canterbury Cemetery, West Court Avenue	Within the Open Space Strategy
41	The Church of Jesus Christ of Latter-day Saints	Within the Open Space Strategy
42	Mandeville Road allotments	Within the Open Space Strategy
43	St Dunstan's Church, Canterbury	Within the Open Space Strategy
44	The Butterfly Garden	Within the Open Space Strategy

ID	Site name / Location	Phase 1 outcome
45	Lady Wootons Green	Within the Open Space Strategy
46	Land between Upper Bridge Street and St George's Terrace	Within the Open Space Strategy
47	Land between Rheims Way and Queens Avenue	Within the Open Space Strategy
48	Westgate Gardens (West)	Within the Open Space Strategy
49	Westgate Gardens (East)	Within the Open Space Strategy
50	Land adjacent to Tourtel Road	Within the Open Space Strategy
51	Land between St Radigunds Street and Church Lane	Within the Open Space Strategy
52	Land behind Kingsmead Leisure Centre	Within the Open Space Strategy
53	Great Stour, Ashford to Fordwich	Progress to Phase 2
54	King George V Field	Within the Open Space Strategy
55	Sturry Road allotments	Within the Open Space Strategy
56	Field Avenue	Within the Open Space Strategy
57	Westgate Gardens	Within the Open Space Strategy
58	Clock Tower Square	Within the Open Space Strategy
59	Kingsmead Playing Field	Within the Open Space Strategy
60	Bingley Island	Within the Open Space Strategy
61	Wincheap Foundation Primary School	Education facility
62	The Orchard School	Within the Playing Pitch Strategy
63	Land adjacent to Puckle Lane	Progress to Phase 2
64	St Anselms R.C. School	Within the Playing Pitch Strategy
65	St Peter's Church	Within the Open Space Strategy
66	Land adjacent to 11 Orange Street	Progress to Phase 2
67	St Alphege's Church	Within the Open Space Strategy
68	King Street	Within the Open Space Strategy
69	The Canterbury Primary School	Education facility
70	Richmond Gardens/Meadow Road allotments	Within the Open Space Strategy
71	Chaucer College	Education facility
72	King's School Recreation Centre (Blores)	Within the Playing Pitch Strategy
73	North of Solley's Orchard	Within the Open Space Strategy
74	St Lawrence Ground	Within the Playing Pitch Strategy
75	Pilgrims Way	Within the Playing Pitch Strategy

ID	Site name / Location	Phase 1 outcome
		Within the Playing Pitch Strategy and
76	Canterbury Christ Church University Sports Centre	Indoor Built Facilities Strategy
77	The Precincts	Within the Open Space Strategy
78	St Augustine's Abbey Gardens	Within the Open Space Strategy
79	The King's School	Education facility
80	St Thomas' Catholic Primary School	Education facility
81	Abbots Mill Garden	Within the Open Space Strategy
82	North of Abbots Mill Garden	Within the Open Space Strategy
83	Land adjacent to Blackfriars Street and River Stour	Within the Open Space Strategy
84	Land adjacent to St. Radigunds Car Park	Within the Open Space Strategy
85	St Stephen's Junior School	Within the Playing Pitch Strategy
86	Spring Lane (Chaucer Technology School Pitches)	Within the Playing Pitch Strategy
87	Parkside Community Primary School	Education facility
88	Whitefriars Square	Within the Open Space Strategy
89	Simon Langton Girls' Grammar School	Within the Playing Pitch Strategy
90	Play area opposite eastern end of Talavera Road	Within the Open Space Strategy
91	Wales Crescent play area	Within the Open Space Strategy
92	Land at Howe Barracks (northern parcel)	Progress to Phase 2
93	Land at Howe Barracks (southern parcel)	Part within the Open Space Strategy and part within the Playing Pitch Strategy
94	Chaucer Road (southern parcel)	Within the Open Space Strategy
95	Chaucer Road (northern parcel)	Within the Open Space Strategy
96	Land to the north-east of Kemsing Gardens	Progress to Phase 2