



MARCH 2023

## PLANNING AND AFFORDABLE HOUSING STATEMENT

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LAND OFF THE HILL, LITTLEBOURNE  
CANTERBURY

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## **APPENDICES**

Appendix 1 – Land off The Hill, Littlebourne (CA/21/01657) Decision Notice

Appendix 2 – Section 106 Heads of Terms

# 1 INTRODUCTION

## 1.1 Scope of this Statement

1.1.1 This Planning and Affordable Housing Statement has been prepared in support of an outline planning application made by Gladman Developments Ltd (Gladman) for development of land off The Hill, Littlebourne. The description of development is as follows:

**“Outline planning application for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children’s play area and surface water flood mitigation and attenuation. All matters reserved except for access.”**

1.1.2 The application site is well located to the existing built-up area of Littlebourne and represents a suitable and sustainable location for housing.

1.1.3 The application site is located in the administrative area of Canterbury City Council and comprises an irregular shaped parcel of land which forms part of a wider agricultural holding. The site covers an area of 15.77 ha and fronts onto both The Hill to the north and Bekesbourne Lane to the east.

1.1.4 The outline planning application is seeking approval in principle for the development proposals. This Planning and Affordable Housing Statement is one in a suite of documents submitted to support the application and comprehensively demonstrates the suitability and sustainability of the site for housing development.

1.1.5 The following documents have been submitted in support of the planning application:

- Planning and Affordable Housing Statement
- Socio-economic Sustainability Statement
- Sustainability Statement
- Statement of Community Involvement
- Travel Plan

- Transport Assessment
- Foul Drainage Analysis Report
- Flood Risk Assessment
- Nutrient Neutrality Assessment
- Soils and Agricultural Land Quality Assessment
- Mineral Resource Assessment
- Phase I Site Investigation
- Landscape and Visual Assessment
- Utilities Statement
- Air Quality Assessment
- Noise Screening
- Ecological Appraisal
- Arboricultural Assessment
- Heritage and Archaeology Appraisal
- Design and Access Statement

1.1.6 This Planning and Affordable Housing Statement explains why development is needed in this location and the significant social, environmental and economic benefits that the proposal will bring to the area. It also confirms, drawing on the supporting technical information, that no significant and demonstrable adverse impacts would arise as a consequence of the development, to outweigh these benefits.

1.1.1 The Planning and Affordable Housing Statement further explains the policy context and how the proposed development is appropriate, having regard to the statutory development plan and other material considerations including the Framework. It demonstrates how the proposed development complies with national policy set in the Framework and why it is appropriate to bring forward development on this site.

## 1.2 Planning History

- 1.2.1 Previously, Gladman submitted an outline planning application (application reference: CA/21/01657) for 115 dwellings which was refused on 30<sup>th</sup> September 2021. This section will address each of the reasons for refusal and how they have been addressed by the current planning application.
- 1.2.2 The first reason for refusal detailed that the site was not identified as suitable for residential development within the Canterbury District Local Plan 2017 and that this would lead to the permanent loss of the best and most versatile agricultural land. It is considered that the Council's in principle position to development on the application site has evolved, given that it has now been identified for residential development in the Canterbury District Local Plan 2045 under policy R15 for 330 dwellings, indicating the Council's view that the site is suitable for residential development. Gladman have conducted a Soils and Agricultural Quality Assessment which demonstrates that the majority of the site is not classified as Best and Most Versatile land. The Landscape and Visual Appraisal has been updated and it concludes that as the site is visually contained to most of the surrounding area and the various design measures that will visually buffer the site, there would be no unacceptable long-term harm. It is therefore considered that the Council's first reason for refusal has been addressed.
- 1.2.3 The second reason for refusal related to heritage harm. An updated Heritage Statement has been undertaken by Pegasus Group and submitted as part of this new application. It is considered that the less than substantial harm to the setting of designated heritage assets identified is outweighed by the public benefits of the development. This is set out in more detail within Section 6 of this planning statement.
- 1.2.4 The third and fourth reasons issued by the council relate to insufficient ecological information being submitted and the issue of nutrient neutrality. The current planning application contains an Ecological Appraisal with a full suite of surveys. This planning application is also accompanied by a Nutrient Neutrality Assessment

which demonstrates how the potential adverse impacts of the development on the Little Stour chalk river priority habitat and the Stodmarsh SAC, SPA and Ramsar can be appropriately addressed. It is therefore anticipated that the third and fourth reasons for refusal have now been resolved.

- 1.2.5 The previous scheme failed to meet and secure the required levels of affordable housing. The new application provides for 30% affordable homes, meeting the requirements set out in the NPPF and the adopted Canterbury District Local Plan. It also meets the policy requirements set out in the emerging Canterbury District Local Plan futureproofing the site up and to 2045. Therefore, the fifth reason for refusal can be addressed by securing affordable housing provision via a section 106 agreement. Appendix 2 of this Planning and Affordable Statement provides initial Heads of Terms for the agreement.
- 1.2.6 The sixth reason for refusal was formed around the impact on highways. The new scheme will introduce a link road through to Bekesbourne Lane, alleviating village centre traffic. A transport assessment (TA) from i-Transport concludes that both accesses will be sufficient to safely accommodate the development traffic and background flows up to 2045 and beyond. The TA demonstrates that the highways network, particularly at key junctions along the A257, has the capacity to accommodate the proposed development and this is also discussed in more detail in Section 4.7 of this statement. Emergency vehicle access formed part of this reason for refusal. The link road through the currently proposed site will provide adequate access from both directions for emergency vehicles.
- 1.2.7 The seventh reason for refusal stated that the application failed to demonstrate the site would not exacerbate flood risk of the surrounding area. It is considered that RSK's Flood Risk Assessment and Outline Surface Water Strategy submitted in support of this planning application resolves this reason for refusal.
- 1.2.8 The final reason for refusal was due to the fact that Gladman did not submit a Sustainability Statement alongside the first application. Gladman have prepared a Sustainability Statement which demonstrates that the current planning application

is in compliance with Policy DBE1 and Table D1 of the adopted Canterbury District Local Plan 2017.

1.2.9 The full reasons can be read in the decision notice (see Appendix 1)

### 1.3 EIA Screening

1.3.1 As the application proposals are for urban development on a site of more than 5 hectares and for more than 150 dwellings, the proposals fall under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. Such projects only require an EIA if the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

1.3.2 Whilst the development is for up to 300 dwellings, it is noted that the location does not present any environmental constraints and nor is it in a sensitive area.

1.3.3 The Local Planning Authority will be required to screen the proposals as part of its legal requirements however the applicant does not consider that an Environmental Statement is required.

## 2 THE PROPOSAL

2.1.1 The drawings submitted as part of this outline planning application for approval are:

- Site location plan (drawing number: 09538-FPCR-XX-XX-DR-L-0002)
- Proposed site access layout (drawing numbers: ITM16283-GA-013A and ITM16283-GA-017)

2.1.2 The application proposal includes the following:

- Up to 300 residential dwellings at (including 30% affordable housing delivered in accordance with current adopted and emerging planning policy, and provision of older person accommodation);
- New access arrangements from the A257 The Hill and a second access on Bekesbourne Lane;
- A pumping station and mini Waste Water Treatment Works (WWTW);
- Community allotments;
- Play provision including a Local Area of Play (LAP) and a Locally Equipped Area of Play (LEAP);
- A new community hub;
- Structural landscape planting and the retention and positive management of key landscape features; and
- Sustainable Drainage Systems (SuDS).

2.1.3 The site will have two vehicular access points, both being new simple priority-controlled T- junctions. One will be located onto A257 The Hill and the other onto Bekesbourne Lane as set out in more detail in the Transport Assessment submitted alongside the current application and prepared by i-Transport. The capacity of

these two accesses has been shown to be sufficient to accommodate the development traffic and background flows up to 2045 and beyond.

- 2.1.4 The application site is located on the south western edge of Littlebourne and forms part of a wider agricultural field. The Hill (A257) runs on the northeastern edge of the site and Bekesbourne Lane runs along the south. Existing development lies adjacent to the site with a single residential property located directly to the west of the site, residential development and a public house to the north beyond The Hill. To the east, there is additional residential development and areas under agricultural use beyond an unmade track; and to the south is Howletts Wild Animal Park.
- 2.1.5 A range of densities and house types are proposed to meet local need. 30% of the units would be affordable in order to meet the requirement of adopted and emerging local planning policy. Affordable housing provision will be secured by a Section 106 Agreement.
- 2.1.6 An assessment against the up-to-date provisions of the Development Plan and the Framework, where relevant, demonstrates the scheme comprises sustainable development because:
- The proposals offer a range of benefits, including making a significant contribution towards meeting the objectively assessed market and affordable housing needs within both Littlebourne and Canterbury.
  - There are no adverse impacts that would significantly and demonstrably outweigh the benefits.
  - Benefits arising from development include the delivery of 300 new homes, 30% affordable homes to help meet the affordable housing needs, older persons accommodation, a community hub for the use of both new and existing residents, 6.6gha of public open space, a parkland with footpaths, £36m construction spend, £10.7m of potential household expenditure, 654FTE direct and indirect jobs in construction.

## 3 PLANNING POLICY FRAMEWORK AND MATERIAL CONSIDERATIONS

### 3.1 Background

3.1.1 This section sets out the planning policy framework relevant to the site and the proposed development. Consideration of the proposed development within the context of the relevant Development Plan policies is undertaken in Chapter 4 of this Statement.

### 3.2 The Development Plan

3.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 places a statutory duty on local planning authorities to determine planning applications in accordance with the development plan unless material planning considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development.

3.2.2 The Framework is a material planning consideration but does not change the statutory status of the Development Plan as the starting point for decision making. The planning application should be considered in this context.

### 3.3 Adopted Canterbury District Local Plan 2017

3.3.1 The Development Plan applicable to this planning application comprises of:

- Canterbury District Local Plan [CDLP] (Adopted July 2017)

3.3.2 Canterbury City Council adopted the Canterbury District Local Plan in July 2017, covering the plan period from 2011 until 2031. Over this period the council are required to deliver 16,000 dwellings. As set out within Policy SP2: Development Requirements of the CDLP 2017, the Council has a staged approach to delivery which outlines that over the first five years, 500 dwellings per annum were to be provided and 900 dwellings per annum thereafter.

- 3.3.3 Policy SP1 reflects the presumption in favour of sustainable development as set out in the Framework. The Policy states that applications which accord with the policies of the development plan will be approved, unless material considerations indicate otherwise.
- 3.3.4 The Council acknowledges that Littlebourne is a sustainable settlement through their adopted Local Plan. Littlebourne is categorised as a Local Centre in the rural settlement hierarchy with Policy SP4 accepting that Littlebourne can accommodate new housing, in addition to the Local Plan allocations, that inter alia. Is at a scale in keeping with its location.
- 3.3.1 Policy HD2 sets out the requirement of 30% affordable housing that should be delivered on developments of 11 dwellings or above. The development proposals have made provision for a policy compliant level of affordable housing. The scheme will provide up to 90 affordable homes and will work alongside the Council to achieve a tenure mix that is appropriate for the location.
- 3.3.2 Overall, the proposed development is in accordance with the development plan when considered as a whole.

## 3.4 The Emerging Local Plan

- 3.4.1 As the adopted plan is now over 5 years old, Canterbury City Council have an obligation to update their plan. In the summer of 2021, the Council consulted on the draft district vision and options for the New Local Plan 2040 and from December 2022 to January 2023, the City Council consulted on the evolved Regulation 18 Draft Local Plan 2045.
- 3.4.2 The Local Development Scheme, adopted in October 2022 sets out the following stages:
- Stage 1 Issues and Options – The gathering of information through call for sites, running from October 2019 to August 2021
  - Stage 2 – Draft Local Plan preparation and consultation (Regulation 18), running from September 2021 to January 2023

- Stage 3 – Pre-Submission preparation and publication (Regulation 1), running from February 2023 to September 2023
- Stage 4 – Submission (Regulation 22) and Independent Examination Hearing running from October 2023 to August 2024
- Stage 5 & 6 – Inspectors Report Issued, followed by Adoption of the Local Plan by September 2024

### 3.5 Key policies of the Draft Canterbury District Local Plan 2045

#### *Policy R15 – The Hill Littlebourne*

3.5.1 The most relevant draft Local Plan policy to the determination of this planning application is Policy R15 – The Hill Littlebourne, which allocates the site for approximately 330 dwellings, amongst other things. The proposed scheme seeks to meet the policy criteria through effective planning and design. These are split into five components which are detailed below:

- Development mix: Policy R15 allocates the site for 300 dwellings, a minimum of 30 units of older person accommodation, non-residential development (community hub) and open space. The proposed scheme presented on the Development Framework Plan and discussed in the Design and Access Statement demonstrates how a high quality, design-led scheme with the proposed development mix could be achieved.
- Design and layout: This planning application is accompanied by a Design and Access Statement which sets out the key design principles for the site which will be explored further at the reserved matters stage. The submitted Development Framework Plan illustrates one way in which the site constraints can be negotiated and how development of the site could integrate into the existing settlement. In order to achieve the average housing density of 35 dph set out in this part of Policy R15 and within Policy DS6, the overall number of dwellings submitted as part of this planning application is lower than the policy proposes to ensure the scheme provides a suitable density to retain a high quality built environment.

- Landscape and green infrastructure: In respect of landscape and green infrastructure, a Landscape and Visual Appraisal and an Ecological Appraisal have been submitted to illustrate how landscaping and biodiversity enhancements can be incorporated into the development in compliance with Policy R15.
- Access and transportation: The planning application is accompanied by a Transport Assessment which sets out in detail how the proposal accords with the aspirations of Policy R15, including the provision of a link road through the site and details of pedestrian and cycle connectivity.
- Phasing and delivery: Gladman are willing to agree suitably worded planning conditions to secure the phasing and delivery of the site and therefore, the proposed development complies with this part of Policy R15.

*Policy SS3 – Development Strategy for the District*

- 3.5.2 Policy SS3 states that provision is made over the plan period for an “average of 1,252 new dwellings per year”. Canterbury urban area is described as the principal focus for development in the district, with Whitstable and Herne Bay as the secondary focus, alongside a new garden community at Cooting Farm. Littlebourne, along with Sturry, Bridge, Chartham, Hersden and Blean is identified as a second-tier rural service centre. The policy states that new development will be supported within the settlement boundaries of these settlements. The application site is located within the proposed settlement boundaries and therefore, the proposed development is in accordance with Policy SS3.
- 3.5.3 There are also several other emerging policies that are relevant to this application:
- Policy SS1 – Environmental Strategy for the District
  - Policy SS2 – Sustainable design strategy for the district
  - Policy SS4 – Movement and transportation strategy for
  - the district

- Policy DS1 – Affordable Housing
- Policy DS2 – Housing mix
- Policy DS6- Sustainable Design
- Policy DS14 – Active and sustainable travel
- Policy DS15- Highways and parking
- Policy DS16 – Air Quality
- Policy DS17 – Habitats of International Importance
- Policy DS18 – Habitats and Landscapes of National Importance
- Policy DS20- Flood risk and sustainable drainage
- Policy DS21 – Supporting biodiversity recovery
- Policy DS22 – Landscape character
- Policy DS24 – Publicly accessible open space and sports
- Policy DS26 – Historic environment and archaeology
- Policy DM14 – Flood risk
- Policy DM15- Sustainable drainage
- Policy DM17 – Noise pollution and tranquillity

3.5.4 Overall, the proposed development is in accordance with the emerging policies set out within the Draft CDLP 2045. Due to the relatively early stage of the emerging local plan, Gladman only attribute limited weight to the emerging plan policies. However, the Regulation 18 Draft Local Plan illustrates the Council’s direction of travel, and it is evident that the Council consider that the site is suitable and can deliver meaningful residential growth to Littlebourne.

## 3.6 National Planning Policy Framework

- 3.6.1 The NPPF is an important material consideration in planning decisions. The NPPF sets out the Government's approach to sustainable development and core planning principles. A revised NPPF was published by the Government in July 2021.

### Presumption in Favour of Sustainable Development

- 3.6.1 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 3.6.2 The NPPF sets out three overarching objectives towards achieving sustainable development under paragraph 8, which includes ensuring that sufficient land is available in the right places to support growth; making sure that a sufficient number and range of homes can be provided to meet the needs of present and future generations supported by well-designed environments and accessible services; and ensuring that land is used effectively to improve biodiversity, use resources prudently by minimising waste and pollution, mitigating and adapting to climate change and moving towards a low carbon economy.
- 3.6.3 At the heart of the Framework is the 'presumption in favour of sustainable development'. Paragraph 11 sets out how planning applications should be determined in this context:

*"11. Plans and decisions should apply a presumption in favour of sustainable development...*

*For decision-taking this means:*

*c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>8</sup>, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>7</sup>; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

3.6.4 Footnote 7 of the Framework identifies a closed list of potential restrictive policies that may in a particular case cause the presumption to be disapplied. The application site falls within the Stodmarsh Nutrient Impact Area and has the potential to have a likely significant effect on the Stodmarsh SPA SAC Ramsar site. Stodmarsh is classified as a ‘habitat site’ (as detailed in Paragraph 181 of the NPPF) and is subject to one of the designations cited within footnote 7. However, the shadow HRA concludes that, subject to mitigation as set out, the proposed development will not have an adverse impact on the integrity of the SAC SPA Ramsar and therefore, the presumption should not be disapplied.

3.6.5 Footnote 8 provides further guidance on when policies may be considered ‘out of date’. It confirms that when a local planning authority (LPA) cannot demonstrate a five-year housing land supply or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years, the policies which are most important for determining an application involving the provision of housing should be considered to be out of date.

3.6.6 Paragraph 12 of NPPF reiterates that the presumption in favour of sustainable development does not change the statutory status of the Development Plan as the starting point for decision making.

### 3.7 The Need for Housing

3.7.1 The growing population and household formation rates alongside too few houses being built has resulted in a housing crisis in this country.

3.7.2 Whilst there is often great debate about the delivery of both market and affordable housing, in reality it is about meeting a very basic human need of local people. People wish to be able to live in suitable accommodation which they can afford and

in a place that they want to live. Where sufficient housing of a suitable type is not available, this has a real, negative impact upon society.

- 3.7.3 This development would provide up to 210 market houses and up to 90 affordable homes, helping to address the local housing issues in Canterbury district.

### 3.8 Five year Housing Land Supply

- 3.8.1 The supply of available and deliverable sites for housing in Canterbury is an important material consideration in determining the weight to relevant policies for the supply of housing.

- 3.8.2 Paragraph 11 of the NPPF states that where there are no development plan policies or the policies most important to determining the application are out of date, the presumption in favour of sustainable development applies (unless any of the restrictive policies in Footnote 7 apply). Footnote 8 makes it clear that this includes when a local authority cannot demonstrate a five-year supply of deliverable housing sites or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

- 3.8.3 The Framework (paragraph 74) requires an LPA to demonstrate a minimum of five years' worth of deliverable sites against its housing requirement, with a delivery buffer of either 5%, 10% or 20% (moved forward from later in the plan period) depending on past performance. Local authorities should also make every effort to redress previous underperformance within the immediate five-year period (commonly referred to as the 'Sedgefield approach') and the delivery buffer should be applied to both the requirement and the accrued backlog.

#### Housing Land Supply in Canterbury

- 3.8.4 The Council's most recent five-year housing land supply update was published in December 2022 and outlines a claimed supply position of 5.65 years covering the period 1 April 2022 to 31 March 2027. However, Gladman consider that the Council are currently unable to demonstrate a five year housing land supply.

3.8.5 The Council's failure of the national 2021 Housing Delivery Test (HDT), with delivery considerably below the 75% threshold required against its target over the last three years, means that irrespective of the five year land supply position, the presumption in favour of sustainable development or "tilted balance" is engaged. Moreover, the issue with housing delivery is likely to persist due to the impact that the Stodmarsh nutrient neutrality issue is having upon development in the district.

3.8.6 The market and affordable homes proposed on the application site could make a significant contribution to housing supply in Canterbury during the next five years of the plan period, therefore helping to address the immediate lack of a five-year supply of deliverable housing sites. The site would also provide homes beyond this period to assist the Council in maintaining a five year housing land supply, on a sustainable site which the Council have identified as an emerging allocation for residential development.

### 3.9 Housing Need Summary

3.9.1 There is a pressing need throughout the country to deliver more housing to solve the housing crisis. Canterbury Council has a responsibility to deliver the homes needed within the district.

3.9.2 Canterbury City Council cannot currently demonstrate a five year supply of deliverable housing sites. Therefore, this application directly responds to the housing needs within Canterbury and would help enable the Council to be able to demonstrate a five year supply of housing. Given that there is a lack of a five year housing land supply in accordance with paragraph 11 of the Framework the tilted balance should apply.

## 4 PLANNING APPRAISAL

### 4.1 Introduction

4.1.1 This section of the Statement assesses the proposed development against the relevant policies of the Development Plan, and other material considerations. The overall planning balance is considered in Chapter 6.

### 4.2 Decision-Making Approach

4.2.1 The Development Plan is the starting point for the determination of planning applications.

4.2.2 The Canterbury District Local Plan was adopted in 2017 and is aimed to guide development in Canterbury until 2031.

4.2.3 Paragraph 11 of the NPPF requires development proposals that are in accordance with an up-to-date Development Plan to be approved without delay. Where there are no relevant Development Plan policies, or the policies most important for determining the planning application are out of date, planning permission should be granted unless policies within the Framework which seek to protect assets of importance are applicable; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

### 4.3 Sustainability

4.3.1 The revised NPPF was published in 2021 and its key objective is to deliver sustainable development. Paragraph 8 sets out the three overarching objectives of the planning system; economic, social and environmental that are required to achieve sustainable development. At the heart of the NPPF there is a presumption in favour of sustainable development (paragraph 11).

#### **Sustainable Location**

4.3.2 The application site comprises an irregular shaped field isituated to the west of the village of Littlebourne. Hersden is located approximately 4km to the north, Wingham is

located approximately 3.75km to the east, Bekesbourne approximately 2.2km to the south west and Canterbury approximately 4km to the west.

4.3.3 The site is located within close proximity to bus stops providing a regular service to Canterbury City Centre and has good pedestrian links to existing shops, services and employment opportunities such as Littlebourne Primary School; Four Village Stores; Littlebourne Surgery; and Littlebourne Post Office. This is illustrated in more detail in Figure 3 of the Design and Access Statement (DAS).

4.3.4 The application site presents an opportunity for the sustainable growth of Littlebourne because:

- The site is suitable for residential development in terms of its sustainable location and characteristics in relation to the existing settlement facilities;
- The site has potential to achieve a biodiversity net gain;
- The site is well contained within the landscape and the majority of important landscape features, such as hedgerows, are to be retained and improved; and
- The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact on the local network.

## 4.4 Provision of Affordable Housing

4.4.1 The application site accords with Policy HD2 of the adopted Canterbury District Local Plan which requires 30% of affordable housing to be delivered on developments such as the proposed application. The affordable housing statement at Chapter 5 covers the importance of affordable housing provision in more detail.

## 4.5 Design Strategy

4.5.1 Good quality design is a key principle of the NPPF. It states

*"...high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve."<sup>1</sup>*

4.5.2 This application has been submitted in outline; design and layout are to be agreed through a reserved matters planning application. However, key design principles have been used to inform the Development Framework Plan and Illustrative Masterplan to show how the development could be designed. These design principles are explained in the Design and Access Statement (DAS) supporting this application.

4.5.3 The Canterbury District Local Plan also requires a high-quality design to be achieved, this is set out within Policy DBE3. Policy DBE1 provides the requirement for Sustainable Design and Construction which is explored in detail in the Sustainability Statement submitted in support of this planning application.

4.5.4 As mentioned above, the DAS sets out how the proposed development will meet the design requirements of the NPPF, and the criteria set out with the Local Plan. The DAS demonstrates that the development will provide a choice of housing to meet the needs of the area, whilst respecting and enhancing the site's environmental and landscape character. It will also promote the use of sustainable transport and provide surfaced paths/ bicycle routes through the development.

## 4.6 Landscape

4.6.1 Under Policy LB4 in the Canterbury District Local Plan, development must 'reinforce, restore, conserve or improve' the landscape character of the area in which development is proposed.

4.6.1 A LVA prepared by FPCR, submitted as part of the application, assesses the potential landscape and visual impacts of the proposed development. The development framework plan introduces and retains landscape features that reflect the landscape character of the site and its surrounding area.

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<sup>1</sup> Paragraph 126.

4.6.2 The LVA concludes that the site is currently relatively featureless in terms of vegetation, with a drainage channel running through the site and along the northern part of the eastern boundary. The site is also well contained by existing vegetation, surrounding development, woodland blocks and topography. Of the limited views that are available most are seen in the context of the existing settlement. The development will also mitigate any harm through design measures which will also provide a range of habitat, vegetation enhancements and connections. Any landscape and visual effects at completion will be localised and not result in any long-term harm. Sections 5.2 and 5.3 of the Landscape and Visual Appraisal sets out the Landscape Design and Green Infrastructure Objectives and Proposals for the application site in more detail.

## 4.7 Transport and Access

4.7.1 The NPPF at paragraph 104 notes that transport issues should be considered early in development proposals. The proposals should consider any potential impacts on the transport network and how these can be addressed, opportunities from existing and proposed transport infrastructure, opportunities to promote sustainable transport, environmental impacts of transport, patterns of movement and how transport fits into the design of schemes.

4.7.2 Paragraph 113 of the NPPF requires all developments that will generate significant amounts of movement to provide a travel plan and to be supported by a transport statement or assessment so that the likely impacts of the proposal can be assessed.

4.7.3 Canterbury District Local Plan policy T1 states that developments should promote sustainable transport methods and be supported by a Travel Plan. The application is supported by a Transport Assessment prepared by i-Transport.

4.7.4 The site will have two vehicular access points, both being new simple priority-controlled T-junctions. One will be located onto A257 The Hill and the other onto Bekesbourne Lane. The capacity of these two accesses has been shown to be

sufficient to accommodate the development traffic and background flows up to 2045 and beyond.

- 4.7.5 The TA also sets out that a proportional impact assessment of the forecast development traffic upon junctions within Littlebourne and along the A257 corridor towards Canterbury have conducted, based upon the worst-case future year traffic forecasts at 2045, taking account of committed and planned developments, as requested by KCC. This proportional impact assessment concluded that the impacts of the development-generated traffic across much of the wider network are forecast to be negligible, with the exception of the A257 / Buffs Road junction where impacts of greater than 5% are forecast and thus a detailed junction assessment was required. This detailed assessment concluded that the proposed signal-controlled junction would have the capacity to accommodate both future year background and committed/planned development traffic and that generated by the proposed development.
- 4.7.6 The application seeks to promote the use of sustainable transport, the site has good pedestrian connectivity to existing facilities such as the Littlebourne Primary School; Four Village Stores; Littlebourne Surgery; and Littlebourne Post Office. There are existing footpath links into the settlement which are utilised through the cycle/walk ways provided by the scheme.
- 4.7.7 With the location of the existing bus stops, frequency and journey time of the bus service to Canterbury, it is considered that the existing provision will ensure residents of the site have access to good quality sustainable transport connections to Canterbury, that will help encourage and foster non-car travel.
- 4.7.8 It is also proposed that an Electric Vehicle hire car club is made available on site to provide 1 vehicle for each 50 homes. It would benefit both new and existing residents by being readily accessible and provide a further appropriate sustainable transport intervention.

## 4.8 Green Infrastructure and Public Open Space

- 4.8.1 The proposed development includes approximately 6.6ha of green infrastructure and public open spaces.
- 4.8.2 This will enhance the landscape and provide community benefits through the provision of allotments and community orchards; equipped play provision areas; surfaced foot/cycle paths; native tree belts; and green corridors.
- 4.8.3 Policy OS11 sets out the council's requirements for open space and the typologies that should be provided on site. The proposals have considered this and are compliant with each criterion.

## 4.9 Ecology

- 4.9.1 An Ecological Appraisal has been submitted as part of the application; this assesses the potential impact on ecology of the proposed development. In the assessment produced by FPCR, the site is currently of low ecological value as it is an arable farmland. The proposed scheme has the potential to increase the ecological value of the site.
- 4.9.2 Canterbury District Local Plan requires development under Policy LB8 to avoid the fragmentation of existing habitats and support coherent ecological networks. Whilst also retaining, protecting and enhancing notable ecological features. Finally, new schemes must protect opportunities for improving the connectivity of habitats.
- 4.9.3 The application proposes to improve the ecology on site through additional planting in the form of native tree belts, forming green corridors. Further opportunities to enhance the development include attenuation features, allotments and a community orchard. As a result of this, biodiversity enhancements will be achieved through the development proposals.

## 4.10 Historic Environment

- 4.10.1 An aim of the NPPF is to conserve and enhance heritage assets. Paragraph 194 requires applicants to describe the impact of developments on heritage assets and their setting.
- 4.10.2 Policy HE1 sets out that development proposals should conserve and enhance heritage assets including archaeological interest.
- 4.10.3 The Heritage Statement submitted as part of the application concludes in regard to archaeological remains, within the earlier prehistoric era the site is deemed to have low potential. Both Romano-British and Anglo-Saxon periods are considered to have low to moderate potential, and the post-medieval to modern date is considered to have low potential.
- 4.10.4 In relation to designated heritage assets, the proposed development is anticipated to cause very minor harm to the heritage significance of The Evenhill and 48 The Hill, both non-designated heritage assets, through changes to their historic setting.
- 4.10.5 The proposed development within the site will result in less than substantial harm, at the lowermost end of the spectrum, to the heritage significance of the Grade II Listed Coachman's Cottage/ Cedar Lodge. It is considered that the site only makes a very minor contribution to the heritage significance of the asset through illustrating its once more rural wider surrounds.
- 4.10.6 The southern boundary of the Littlebourne Conservation Area bounds the north-eastern and part of the northwestern site boundaries. Whilst the hedgerow flanking The Hill screens or very heavily filters lower-level views from that route, there are views through gaps in the vegetation, views from the upper levels of properties within the Conservation Area, and views back to the Conservation Area across the site from Bekesbourne Lane. The site makes a small contribution to the overall significance of the asset through setting, being part of its rural surrounds. The proposed development is set back from the edge of the Conservation Area beyond the hedgerow and open space, but will curtail views to agricultural land, and views

back to the edge of the Conservation Area. The proposed development is anticipated to cause less than substantial harm at the lower end of the spectrum to the heritage significance of the Littlebourne Conservation Area, via a change in setting.

## 4.11 Flood Risk and Drainage

4.11.1 The site is located within Flood Zone 1 and is not at risk from flooding from rivers and seas.

4.11.2 Policy CC4 requires a Flood Risk Assessment to be submitted as part of a planning application. The flood risk assessment demonstrates that the proposed development will not increase flood risk downstream. The drainage strategy proposed will discharge to an onsite watercourse, limited to the greenfield QBAR rate for the contributing catchment area. Surface water will be attenuated in two basins, the southern basin will be pumped towards the central ditch. The basins will provide surface water storage and attenuation for the 1 in 100 storm plus 45% climate change event including 10% for urban creep. There will be no infiltration within the Groundwater Source Protection Zone, although permeable paving could be used for shared surfaces and driveways. If any works are required near the watercourses consent should be obtained from the LLFA or EA. As a result of the mitigating measures the proposals will be in accordance with Policy CC4.

4.11.3 Through the design evolution of the drainage strategy, the impact of climate change has been taken into account.

## 4.12 Noise

4.12.1 Under British Standard 8233:2014 found within Planning Practice Guidance – Noise (2019), guidelines for noise levels within development are suggested, echoing those set out by the World Health organisation.

4.12.2 As part of the application Gladman will be submitting a Noise Screening Report undertaken by Wardell Armstrong. The report concludes noise from traffic on the A257 is unlikely to have any adverse effects. The Evenhill Hotel and Howletts Wild

Animal Park is unlikely to have significant adverse impact. Any audible noise can be mitigated through effective acoustic design, utilising standoff distances and plot orientation in favour of the development.

- 4.12.3 As a result of effective acoustic design, the guidelines set out in BS8233 can be met. Ensuring that there is no significant adverse effect on the proposed development site.

## 4.13 Air

- 4.13.1 The Institute of Air Quality Management (IAQM) set out guidelines which any proposed development must adhere to.

- 4.13.2 An Air Quality Assessment undertaken by Wardell Armstrong concluded that in line with IAQM guidelines, the impact on air quality during the construction phase of the development, with site specific mitigation measures in place is not significant.

- 4.13.3 Similarly, during the operational phase of the development the site was assessed in accordance with Defra guidance. Using the latest vehicle emission factors from EFT v11.0, pollutant concentrations in the 2024 opening year and 2029 future year are below the relevant annual mean objectives and limit values. Therefore, the effect of the proposed development on existing and proposed sensitive receptors is deemed to be not significant.

## 4.14 Arboriculture

- 4.14.1 Under Policy LB10 of the Canterbury District Local Plan trees, hedgerows and woodland that make an important contribution to the amenity of the site must be retained. Due to the open nature of the site the proposed development provides the opportunity to increase the biodiversity of the site in terms of both flora and fauna.

- 4.14.2 Within the Arboricultural Assessment submitted alongside the planning application, FPCR undertook an Arboricultural Impact Assessment in line with British Standard 5837 within 'Trees in Relation to Design, Demolition and

Construction (BS5837). It states that all trees retained on site will be protected by suitable barriers throughout construction.

- 4.14.3 The assessment concludes that proposals will greatly increase the canopy cover in the area, turning an open arable field into a residential area with tree lined streets and heavily treed green open space.

## 4.15 Nutrient Neutrality

- 4.15.1 As set out within the Nutrient Neutrality Report produced by Water Environment Ltd, in 2018, the European Court of Justice refined the definition of plans and projects and ruled that mitigation needs to be in place to ensure that there will be no significant adverse impacts on the conservation status of designated sites. Additional nutrient loading to designated sites already in an unfavourable conservation status is effectively therefore not permissible unless mitigation is in place.

- 4.15.2 In the Stour River catchment in East Kent, developments could adversely impact the designated site known as Stodmarsh. Several of the nature reserve lakes of which the Stodmarsh is composed are in a state of eutrophication (an unfavourable conservation status) and therefore the ruling of the Dutch Case applies. All developments in the catchment have to demonstrate 'nutrient neutrality' in order to ensure no adverse effect on the integrity of the designated site, meaning that the nutrients generated by the development must be less than or equal to the nutrients generated by the existing land use.

- 4.15.3 The Dover Connectivity Study, undertaken on behalf of Dover District Council confirms that impacts of nutrients in treated effluent from Dambridge WwTW on Stodmarsh are negligible. Based on the methodology used in the study, impacts from all nutrient sources upstream of the Stourmouth Pumping Station are considered negligible.

- 4.15.4 The proposed development is located upstream of the Stourmouth Pumping Station, and so this argument will apply. Wastewater will be treated onsite before

discharge of final effluent to the Nail Bourne, which is a tributary of the Little Stour.  
The onsite treatment works will be operated by an Ofwat-licensed water company.

#### 4.16 Planning conditions and obligations

- 4.16.1 Gladman is committed to and willing to discuss any requested planning conditions with officers at Canterbury City Council, to ensure that they satisfy the six tests set out in paragraph 003 of the PPG<sup>2</sup> and paragraph 56 of the NPPF respectively.
- 4.16.2 The applicant is also committed to engaging with the Council in relation to securing planning obligations that satisfy the requirements of Regulation 122 of the Community Infrastructure Levy Regulations and paragraphs 57 and 58 of the NPPF.
- 4.16.3 A draft set of heads of terms for a Section 106 agreement are set out at Appendix 2 of this Statement.

#### 4.17 Summary of the Planning Appraisal

- 4.17.1 In light of the above, the application proposals are compliant with the adopted development plan as a whole and there are no technical reasons to suggest that the current applicant should not be granted planning permission.

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<sup>2</sup> ID: 21a-003-20190723

## 5 AFFORDABLE HOUSING STATEMENT

### 5.1 Context

5.1.1 It is widely acknowledged at all levels that there is a housing crisis in this country, which has arisen as a direct consequence of too few houses being completed to keep pace with a growing population, increasing life expectancy and household formation rates.

5.1.1 In May 2021, the housing charity Shelter published 'Denied the Right to a Safe Home – Exposing the Housing Emergency', which sets out in stark terms the impacts of the housing crisis. Shelter estimate that over 17 million people face the effects of high housing costs and notably concludes that *"we will only end the housing emergency by building affordable, good quality social homes<sup>3</sup>".*

5.1.2 One effect of the national housing crisis is a profound effect on housing affordability. The current Conservative Government has maintained that unaffordability and inability of individuals to get on the housing ladder is a significant problem. The NPPF makes clear that affordable housing should be delivered, and it is essential that sufficient housing is delivered to ensure that *"needs of groups with specific housing requirements are addressed"*.

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<sup>3</sup> Denied the Right to a Safe Home. Shelter (2021) page 10.

- 5.1.3 According to the most recent Department for Levelling Up, Housing and communities (DLUHC) statistics, there are 1.18 million households on local authority social housing waiting lists across the country, which roughly equates to 2.7 million people in need of an affordable home<sup>4</sup>.
- 5.1.4 Additional data published by DLUHC in November 2022 also demonstrated that in 2021/22 only 59,175 gross affordable homes were built and 63,228 starts on site were recorded<sup>5</sup>. At this level of delivery, it will take roughly 20 years to address the current waiting list. This is before factoring in future housing need, or loss of affordable homes through demolition, or the Right to Buy programme.
- 5.1.5 At a national level the direction of travel to address housing need and supply, including affordable housing, is abundantly clear. With 44% of affordable homes in 2020/21 funded through s106 agreements<sup>6</sup> (i.e. entirely funded by developers with nil grant from the public sector), political promises rely quite significantly on delivery by the planning system.

## 5.2 Affordable Housing Delivery & Need in Canterbury

- 5.2.1 There have been several assessments of affordable housing need detailed within various evidence base documents, namely the Council's Housing Needs Assessment 2021 (HNA), the Development Requirements Study (DRS), the Canterbury Strategic Housing Market Assessment 2018 (SHMA) and the 2009 East Kent SHMA, which underpin the now adopted CDLP and the emerging Local Plan. All documents indicate an acute level of affordable housing need and recognise the necessity to deliver additional affordable homes in the District.
- 5.2.2 Table 1 below illustrates the delivery of both market and affordable housing in Canterbury over the 11-year period since 2011, as gleaned from the Council's most recent authority report for the period April 2021 to March 2022.

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<sup>4</sup> DLUHC Live Table 600, December 2021 update.

<sup>5</sup> DLUHC November 2022, Affordable Housing Supply April 2021 to March 2022, England

<sup>6</sup> DLUHC November 2022, Affordable Housing Supply April 2021 to March 2022, England.

**Table 1: Canterbury Market and Affordable Housing Completions**

Year	Housing Completions <sup>7</sup>		Affordable completions as % of total completions
	All	Affordable	
2011/12	655	144	22%
2012/13	597	121	20%
2013/14	641	70	11%
2014/15	555	40	7%
2015/16	594	50	8%
2016/17	422	48	11%
2017/18	1,119	45	4%
2018/19	444	56	13%
2019/20	597	139	23%
2020/21	474	57	12%
2021/22	791	143	18%
<b>Total</b>	<b>6,889</b>	<b>770</b>	<b>11%</b>

5.2.3 As illustrated in Table 1, the Council has delivered on average 70 affordable homes each year since 2011. Over the same period, affordable housing completions have comprised just 11% of overall housing completions in Canterbury. This is significantly lower than the requirements of Policy HD2, which seeks provision of 30% affordable housing on qualifying sites.

5.2.4 For the purpose of analysing affordable housing delivery in Canterbury in the context of assessed needs for affordable housing, the two most recent assessments of need are utilised. These are:

- 2018 SHMA which identified an annual target of 401–751 new affordable homes per year for the period 2016-2031.

<sup>7</sup> Data taken from Canterbury City Council Authority Monitoring Report 2021/22 – Table 4.1 and Table B.1

- 2021 HNA which identified an annual need of 464 affordable dwellings per annum for the period 2020-2040.

5.2.5 Table 2 below compares the delivery of affordable housing in Canterbury over the six-year period between 2016 and 2022, with the conservative end of annual target of 401–751 new affordable homes per year for the period 2016-2031 as set out within the 2018 SHMA.

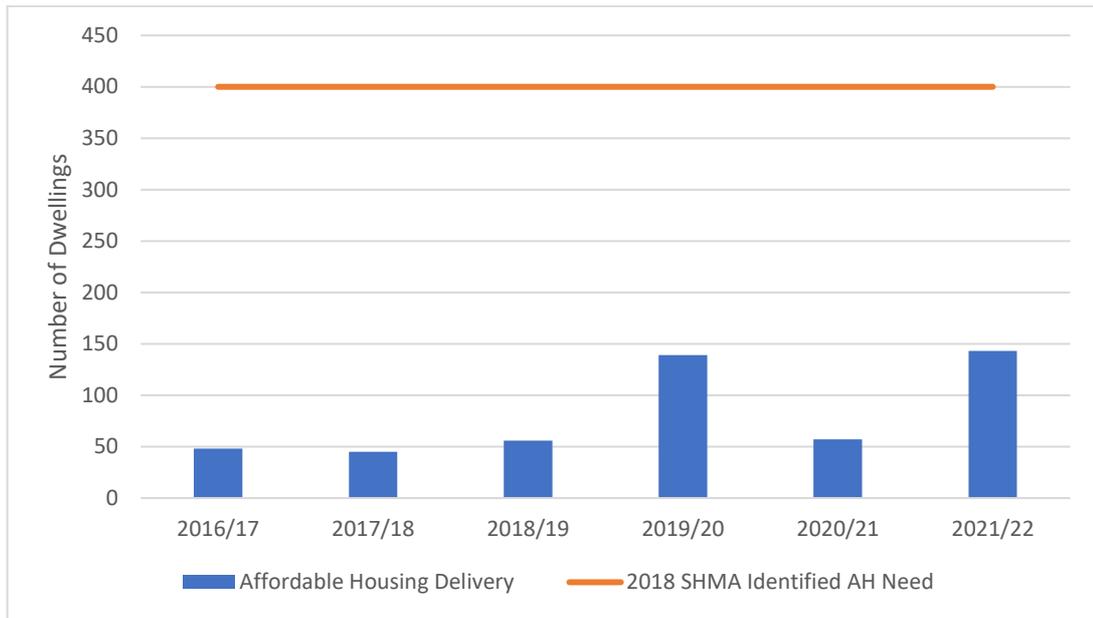
**Table 2: Affordable Housing Completions in Canterbury compared to Identified Affordable Need in 2018 SHMA.**

Year	Housing Completions		Affordable Housing Need (2018 SHMA)	Affordable Shortfall / Surplus
	All	Affordable		
2016/17	422	48	401	-374
2017/18	1,119	45	401	-355
2018/19	444	56	401	-344
2019/20	597	139	401	-261
2020/21	474	57	401	-343
2021/22	791	143	401	-257
<b>Total</b>	<b>3,847</b>	<b>488</b>	<b>2,406</b>	<b>- 1,918</b>

5.2.6 Table 2 demonstrates that the Council has delivered just 488 affordable homes since April 2016, equivalent to just 81 affordable homes annually. Over the same six-year period, the 2018 SHMA identified a minimum affordable housing need of 2,406 dwellings. The delivery of just 488 affordable dwellings since April 2016 thus represents a significant under provision (or shortfall) of 1,918 affordable homes.

5.2.7 The extent of affordable housing delivery compared to identified need is better illustrated graphically, as shown in figure 1 which exemplifies the clear and consistent failure to deliver the affordable homes that Canterbury needs.

**Figure 1: Comparison of Canterbury affordable housing delivery against identified need in 2018 SHMA**



5.2.8 Figure 1 demonstrates the ‘real world’ consequence of poor affordable housing delivery in the District. There are at least 1,918 households in Canterbury whose affordable housing needs are not being met. In percentage terms, this represents a 80% shortfall against the minimum assessed needs during the six-year period and constitutes a very significant failure which impacts on those most disadvantaged and vulnerable in society. Furthermore, it also highlights a very serious gap in provision which affects the authority and how it functions in an economic, social and environmentally compatible way.

5.2.9 The most up-to-date assessment of affordable housing need is provided in the 2021 Housing Needs Assessment which identifies a need for an additional 464 affordable homes per annum for the period 2020-2040.

5.2.10 As Table 3 below highlights, there is already a significant shortfall in the delivery of affordable housing that has accumulated in just two monitoring years against the most up-to-date identified need for affordable housing in the District.

**Table 3: Affordable Housing Completions compared to identified affordable need in 2021 Housing Needs Assessment.**

Year	Housing Completions		
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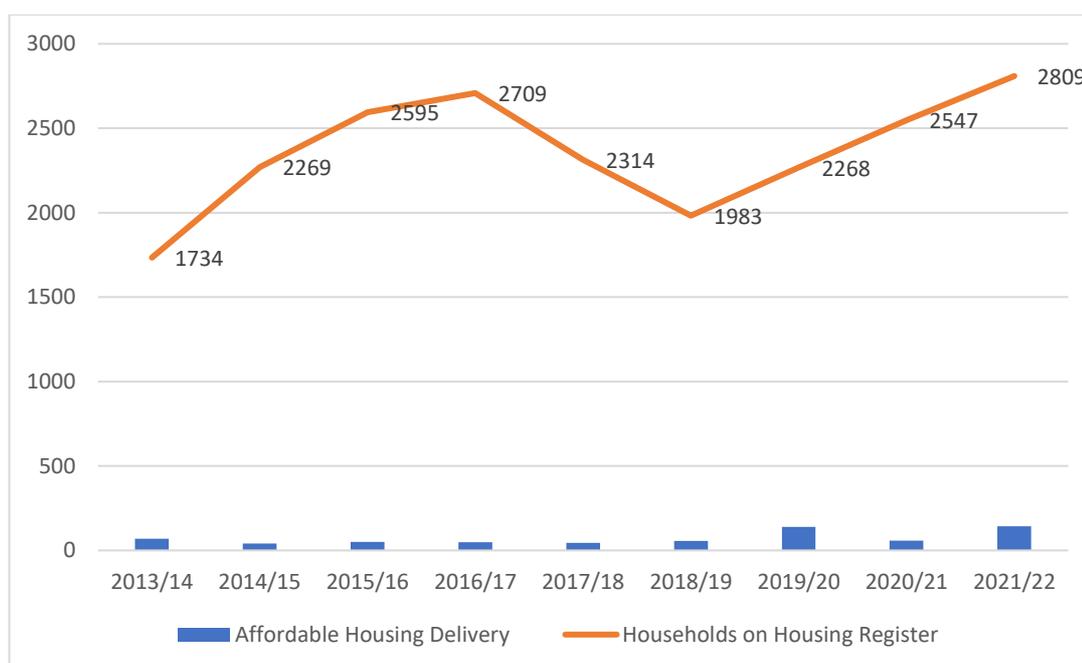
	All	Affordable	Affordable Housing Target	Affordable Shortfall / Surplus
2020/21	474	57	464	-407
2021/22	791	143	464	-321
<b>Total</b>	<b>1,265</b>	<b>200</b>	<b>928</b>	<b>-728</b>

5.2.1 Table 3 clearly demonstrates the gulf between identified needs and actual affordable housing delivery in Canterbury is substantial and there is a clear and pressing need to increase delivery.

### 5.3 Canterbury City Council Housing Affordability Indicators

5.3.1 As of April 2022, there were 2,809 households listed on the Canterbury housing register. This is a stark number and represents a significant number of individuals and families in need. Figure 2 illustrates changes in the housing register and delivery of affordable homes in Canterbury in a nine-year timeframe from 2013, based on data taken from DLUHC Live table 600 and the Council’s annual monitoring reports.

**Figure 2: Households on Canterbury City Council’s Housing Register compared with Affordable Housing Delivery**



- 5.3.2 Whilst there are other mechanisms that may help to meet affordable housing needs, Figure 2 clearly illustrates that delivery of affordable housing in Canterbury has persistently failed to meet identified needs on the housing register. It further demonstrates that the number of households on the housing register has remained high, and indeed increased significantly, over several years, and previous delivery of affordable housing has never been enough to diminish the high numbers of households on the housing register.
- 5.3.3 The continued under delivery of affordable housing has contributed to a worsening of the affordability ratios in the District. Table 5 below provides a clear illustration of the median and lower quartile house price affordability ratio of Canterbury and how these have risen significantly since the start of the current plan period in 2011. The data is sourced from Office for National Statistics (ONS) 'house price to workplace-based earnings ratio' dataset which are updated annually.

**Table 5: Canterbury Affordability Ratios**

Canterbury City Council	2011	2021
Median Affordability ratio	7.53	12.86
Lower Quartile Affordability ratio	9.15	13.14

Source: ONS Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2021, Table 5c & Table 6c.

- 5.3.4 As Table 5 shows, in 2021 the median affordability ratio in Canterbury was 12.86. In other words, average house prices are over 12 times average incomes. This is critical when most high street lenders will only lend up to four times a mortgage applicants' salary.
- 5.3.5 This upward trend is problematic as it demonstrates that house price growth is outstripping wage growth, ultimately making housing more unaffordable for those who live and work within the District and pricing out future buyers. The ONS house price to workplace-based earnings ratio statistics date back to 1997 at which time the median affordability ratio for Canterbury was just 4.17. In the following 24 years,

the median affordability ratio has increased by over 200%, locking the next generation out of home ownership.

## 5.4 Affordable Housing as a Material Consideration

- 5.4.1 The increasing unaffordability of housing in the district and the continuous high numbers of households on the housing register in housing need clearly indicates that that by any measure of affordability, Canterbury is in the midst of an affordable housing crisis, and urgent action must be taken to deliver more affordable homes.
- 5.4.2 At both a national and local level, it is clear there is an urgent and pressing need to deliver as much affordable housing as quickly as possible. There is clear under provision in the district and need is growing.
- 5.4.3 The provision of 30% affordable housing equating to 90 homes on this site will contribute significantly towards the district's affordable housing supply requirements and will provide people with a local connection to the area an affordable property to call their own. This will help alleviate the affordability issue and is a very significant benefit to be weighed positively in the planning balance.

## 6 Planning Balance and Conclusions

### 6.1 Summary of Case and Identified Benefits and Harm

- 6.1.1 The outline planning application is made in the context of the Government's requirement to boost housing land supply and the presumption in favour of sustainable development. The proposal also responds positively to the identified lack of a five-year housing land supply in Canterbury and the identified needs for both market and affordable housing, in addition to being identified under Policy R15 as an emerging allocation for residential development in the Regulation 18 Publication Local Plan.
- 6.1.2 The proposal is in accordance with both the adopted and emerging Development Plan which support development at Local Centres such as Littlebourne and establishes the site as an emerging allocation for residential development,

respectively. It has been demonstrated through the supporting documents that the proposals can accommodate a well-designed scheme that is at a scale and character that can assimilate into Littlebourne where the harms of the scheme are drastically outweighed by the overarching benefits. Planning permission should therefore be approved without delay.

- 6.1.3 Moreover, it is also the case that Canterbury City Council are unable to demonstrate a five-year housing land supply and the Council have failed the most recent Housing Delivery Test, meaning that they have failed to deliver sufficient housing over the last three years. The presumption in favour of sustainable development should also apply to the determination of this application, in accordance with paragraph 11 of the Framework, on this basis.
- 6.1.4 This proposal would be deliverable in the short term and increase the supply and choice of housing at Littlebourne. It would contribute towards economic growth and have wider social benefits to the local community, not least through the provision of the community hub and extensive green infrastructure provision. The proposed application also meets a range of housing requirements, including affordable housing and provision of older person's accommodation. The principles outlined within the DAS and supporting Sustainability Statement would secure a high-quality scheme.
- 6.1.5 The supporting material, assessments and reports demonstrate that there are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations. Gladman is willing to enter into constructive dialogue with the Council to agree a list of conditions and Section 106 Heads of Terms that are necessary to make the development acceptable in planning terms.
- 6.1.6 As with any greenfield site, the development will introduce changes to the area and some urbanising effects. Care has been taken to ensure that the perceived impact on Littlebourne is minimised and acceptable, through careful design and siting, the provision of extensive open space and green infrastructure.

6.1.7 The development of the site, as proposed, would be both suitable and sustainable, and there is justification to grant planning permission in accordance with the relevant provisions of the adopted and emerging Development Plan and presumption in favour of sustainable development.

6.1.8 The relevant material considerations in this case are:

- The proposals would accord with all relevant policies of the adopted Canterbury District Local Plan, including Policy SP4. In accordance with CDLP Policy SP1, planning permission should be granted and there are no material considerations that would indicate otherwise;
- The Site is identified as a residential allocation in the Draft Canterbury District Local Plan under Policy R15- The Hill, Littlebourne;
- The Council is also unable to demonstrate a five-year housing land supply and the Council has failed to deliver sufficient housing under the 2021 Housing Delivery Test, meaning that most important policies for determining the application would be out-of-date and attract reduced weight for the purposes of decision making, and the tilted planning balance would also be engaged on this basis;
- The site is suitable for residential development in terms of its location and characteristics and it is not of high environmental value; and
- The provision of affordable housing, without subsidy, is a significant benefit in circumstances where the Council is not delivering sufficient affordable homes to meet pressing needs.

## 6.2 Benefits

6.2.1 The table below highlights some of the key benefits arising in respect of the application proposal:

<b>Market Housing</b>	It will help to deliver much needed new, quality, family homes, in a community where people wish to live, in a suitable and sustainable location close to existing public transport, shops, and community services.
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<b>Affordable Housing</b>	It will provide a wide range of homes including a policy-compliant provision of affordable housing and provision of older persons accommodation (30% or up to 90 units) in an area where there is an existing unmet need unlikely to be delivered through alternative means.
<b>Jobs and the Economy</b>	<p><b>Immediate Impacts</b></p> <p>The build cost for the development is expected to be around £36m. Calculations suggest that this construction expenditure would support around 654 direct and indirect jobs available for local workers over the period of the build.</p> <p>Over the four years following the completion of the development, Canterbury City Council will benefit from circa £1,500,000 via the New Homes Bonus.</p> <p><b>Lasting Impacts</b></p> <p>It is anticipated that 310 of residents from the new development will be of working age and in employment.</p> <p>Household expenditure from the 300 new homes would be circa £10.7million per year.</p> <p>The scheme will supply new affordable rented and intermediate housing, helping to address substantial local affordable housing needs by providing opportunities for lower income households to own their own home or to secure rented accommodation.</p>
<b>Protecting and enhancing Vitality and Viability</b>	The new residents will increase demand for and use of local services and businesses and increased spending will help to protect, maintain and enhance the services available and accessible within the village and surrounding area.
<b>Public Space and Open Recreation</b>	The proposals will provide formal and informal public open space and green infrastructure and secure its long-term management for use by the new and existing community. It will improve connectivity and access to public rights of way.
<b>Environmental Benefits</b>	Biodiversity of the site will be protected, diversified and improved through new hedgerow and tree planting and delivery of new garden spaces and formal and informal green spaces. Overall, the proposal will achieve a net gain in biodiversity.

## 6.3 Harm

- 6.3.1 The supporting material, assessments and reports demonstrate that there are no unacceptable adverse impacts associated with the scheme.
- 6.3.2 As with any greenfield site, the development will introduce changes to the area and some urbanising effects however, this is to be expected and the LVA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts.
- 6.3.3 It will also involve the loss of some Best and Most Versatile Land; however the majority of the land is limited by wetness limitations, restricting the quality of the land to a mix of Subgrades 3a and 3b.
- 6.3.4 Despite these changes, significant and demonstrable harm will not arise through development overall as proposed.

The less than substantial harm to the significance of Coachman's Cottage/Cedar Lodge and the Littlebourne Conservation Area would fall at the lowermost end of the less than substantial spectrum and is considered to be outweighed by the overriding public benefits of the scheme, including the overwhelming need for housing in the District.

### NPPF 182: Habitats Sites

- 6.3.5 In respect of the issue of nutrient neutrality, Paragraph 182 of the Framework states:
- "The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely impact the integrity of the habitats site."*
- 6.3.6 Alongside this planning application, a Shadow Habitats Regulations Assessment has been submitted which has identified that the project has the potential to impact designated habitats sites. The Council, as competent authority within the auspices

of the Habitats Regulations, is required to undertake an appropriate assessment in order to discharge his duties under that legislation and determine whether the test laid out in paragraph 182 is met.

- 6.3.7 In light of the conclusions of the appropriate assessment exercise undertaken in that Shadow HRA, it is clear that with consideration of the proposed measures intended to avoid or reduce effects, the proposed development will not have any adverse effect on the integrity of any designated habitats sites, either alone or in combination with other plans or projects. In light of this, the applicant considers that in this case the Council has sufficient information to conclude that the project will not adversely affect the integrity of those sites, such that there is no clear reason to refuse the proposal under paragraph 11 d) (i) and the presumption at 11 d) (ii) is not disengaged.

## 6.4 Planning Balance and Conclusions

- 6.4.1 The Framework policies on the delivery of sustainable housing development carry significant weight, and the delivery of the proposed development would support housing and economic development objectives and meet the aims and objectives of sustainable development, securing net gains across all three strands of sustainable development (economic, social and environmental).
- 6.4.2 The application proposals would comply with the relevant policies of the adopted and emerging Development Plan and would also comply with the relevant provisions of the Framework. There are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal and specific policies of the Framework and Development Plan do not indicate that development should be restricted.
- 6.4.3 In accordance with paragraph 11 of the Framework, the development proposals clearly constitutes 'sustainable development' and the planning application should therefore be approved without delay.

## APPENDIX 1: Land off The Hill, Littlebourne (CA/21/01657) Decision Notice

# CANTERBURY CITY COUNCIL

## DECISION NOTICE

**Correspondence Address:**  
Gladmans Developments  
Gladman Developments Ltd

**Town and Country Planning Act 1990  
Town and Country Planning (Development Management Procedure) (England) Order 2015**

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### NOTIFICATION OF REFUSAL OF OUTLINE PLANNING PERMISSION

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**Application Number:** CA/21/01657  
**Location:** Land At The Hill, Littlebourne, Canterbury, Kent  
**Proposal:** Outline planning application for up to 115 residential dwellings (including affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation. All matters reserved except for access.

Take notice that **Canterbury City Council**, the district planning authority under the Town and Country Planning Act 1990, has **REFUSED** your application, as described above, subject to the following reasons:

- 1 The proposed development is located outside of any settlement and is not identified as suitable for residential development within the Canterbury District Local Plan 2017 and as such, if allowed, would result in an unsustainable, unplanned urbanisation of the countryside, and the permanent loss of best and most versatile agricultural land. The proposed development is therefore contrary to policies SP1, SP4, HD4, EMP12 and DBE3 of the Canterbury District Local Plan 2017 and the National Planning Policy Framework.
- 2 The proposed development would result in less than substantial harm to the setting of designated heritage assets which is not outweighed by any public benefit, contrary to policies HE1, HE4 and HE6 of the Canterbury District Local Plan 2017 and the National Planning Policy Framework.
- 3 Insufficient ecological survey information has been submitted to enable the local planning authority to adequately assess the ecological impacts of the proposal and the effectiveness of mitigation proposals, with particular reference to bats, dormouse and reptiles. There is also insufficient assessment as to the potential adverse impacts of the development on the Little Stour chalk river priority habitat and no assessment as to the potential polluting impacts of surface water from the development on the Littlebourne Stream Local Wildlife Site and the mitigation that would be required to offset such an impact. The proposed development is therefore contrary to policies LB7, LB9 and LB13 of the Canterbury District Local Plan 2017 and the National Planning Policy Framework.

- 4 The proposed development would cause a likely harmful significant impact on the Stodmarsh SAC, SPA and Ramsar and without appropriate mitigation it would fail the Appropriate Assessment required by the Habitat Regulations. The proposal is also in conflict with the National Planning Policy Framework and policies SP1 and LB5 of the Canterbury District Local Plan 2017.
- 5 The applicant has failed to secure the required levels of affordable housing to meet local needs contrary to policy HD2 of the Canterbury District Local Plan 2017 and the National Planning Policy Framework.
- 6 The applicant has failed to demonstrate that the highways network, particularly at key junctions along the A257, has the capacity to accommodate the proposed development. Without such assessment it is not possible to conclude that the proposal would not unacceptably impact highways safety. The applicant has also failed to adequately demonstrate that access for the emergency services can be safely accommodated within the layout. The proposal is therefore in conflict with policy DBE3 of the Canterbury District Local Plan 2017.
- 7 The applicant has failed to demonstrate that receiving waters outside of the site have the capacity to accommodate the flow of surface water from the site, and as such it cannot be concluded that the proposal would not contribute to flood risk off site and would not exacerbate any existing flood risk in the locality. The proposed development is therefore in conflict with policy CC11 of the Canterbury District Local Plan 2017.
- 8 No Sustainability Statement has been submitted with the proposal, and as such the applicant has failed to demonstrate how the proposal has responded to the objectives of sustainable development and how it has had regard to the measures outlined in table D1 of the Plan, in conflict with policy DBE1 of the Canterbury District Local Plan 2017.

This application relates only to that required under the Town and Country Planning Acts and does not include any consent or approval under any other enactment or under the Building Regulations. Any other consent or approval which is necessary must be obtained from the appropriate authority.

The application was processed having regard to the National Planning Policy Framework, which requires that where there are potential solutions to problems arising in relation to dealing with planning applications, the council will work with the applicant in a positive and proactive manner to seek solutions to those problems.

NOTES TO APPLICANT:

None



**Andrew Gambrill**  
**Authorised Signatory of the Council**  
**Date of issue: 30 September 2021**

## Appeals to the Secretary of State

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

Appeal Type	Timescale
Householder application	Within 12 weeks of the date of the notice
Minor commercial application	Within 12 weeks of the date of the notice
Express consent for the display of an advertisement	Within 8 weeks of the date of receipt of the notice
Tree Preservation Orders	Within 28 days of the date of the notice
Planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice	Within 28 days of the date of the notice
If an enforcement notice is served relating to the same or substantially the same land and development as in your application.	Within 28 days of the date of service of the enforcement notice, or within 6 months [12 weeks in the case of a householder appeal] of the date of this notice, whichever period expires earlier
All others	Within 6 months of the date of the notice

Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN (Tel: 0303 444 5000) or online at <https://acp.planninginspectorate.gov.uk>

The Secretary of State can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate ([inquiryappeals@planninginspectorate.gov.uk](mailto:inquiryappeals@planninginspectorate.gov.uk)) at least 10 days before submitting the appeal. Further details are on GOV.UK.

### IMPORTANT NOTES

Notification of permission under the Planning Acts does NOT convey consent under The Building Regulations

1. The development to which the attached planning permission relates may also require a separate approval under the Building Regulations.
2. If the planning permission refers to amended plans, any necessary Building Regulations approval should also cover those amendments.
3. If the development involves any demolition work, notice of this this may be required under the Building Act 1984.

Advice on each of the above is available from STG Building Control Partnership on 01634 331133 or by email [building@stgbc.org.uk](mailto:building@stgbc.org.uk)

Application Number: CA/21/01657

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## APPENDIX 2: DRAFT SECTION 106 HEADS OF TERMS

Gladman will seek to enter into constructive dialogue with Canterbury City Council to agree obligations which, in accordance with the CIL Regulations (2010) (as amended) are necessary, directly related to the development and fairly related in scale and kind to the development.

The following heads of terms are suggested:

### **AFFORDABLE HOUSING**

- i. The Agreement will provide for 30% affordable housing with a tenure split to be agreed with the Local Planning Authority.

### **OPEN SPACE**

- i. The Agreement will require the Developer to provide on-site informal open space and an equipped children's play area.
- ii. Appropriate phasing requirements will be specified together with the requirement to agree with the Council an appropriate scheme for the long term maintenance

and management of these areas, including any off-site commuted sums as applicable.

iii. The Agreement will require the Developer to provide, as necessary, an offsite sports provision.

### **HIGHWAYS AND PUBLIC TRANSPORT**

i. The Agreement will require the Developer to provide, as necessary, the improvements identified to improve the public highway, sustainable and public transport provision within the vicinity of the site.

### **OTHER**

i. Other contributions may be identified through the planning application consultation process, and subject to meeting the appropriate tests of necessity and reasonableness, consideration will be given to their inclusion.



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[www.gladman.co.uk](http://www.gladman.co.uk)

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