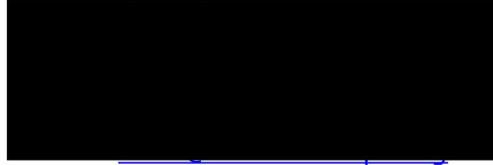




Littlebourne Parish Council



Andrew Gambrill  
Planning Officer  
Canterbury City Council  
Military Road  
Canterbury  
CT1 1YW

Wednesday 10<sup>th</sup> May 2023

Dear Mr Gambrill

**RE: CA/23/00484 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.**

- 1.11 Littlebourne Parish Council object to the proposed outline development CA/23/00484 of around 300 houses on land south of The Hill in Littlebourne and wish for this proposal to be refused. Please note that in 2020, the parish council polled the village when the site was suggested for a much smaller development of around 110 houses and 96% were strongly opposed. The view of the village remains strongly opposed.
- 1.12 The similar but much smaller application for the same site proposed in 2021 was refused by Canterbury City Council on multiple grounds CA/21/01657 for 115 houses of which you will be aware. These were:
- i. The development is outside of any settlement and is not identified as suitable for residential development within the Canterbury City Council Local Plan 2017.
  - ii. The development would result in less than substantial harm to the setting of designated heritage assets which is not outweighed by any public benefit.
  - iii. 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. 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.

- iv. The development would cause likely harmful significant impact on the Stodmarsh SAC, SPA and Ramsar without appropriate mitigation it would fail the appropriate assessment required by the Habitat Regulations.
- v. The applicant has failed to secure the required levels of affordable housing to meet local needs.
- vi. The applicant failed to demonstrate that the highways network, particularly at key junctions along the A257, has capacity to accommodate the proposed development.
- vii. The applicant failed to demonstrate that receiving waters outside 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 existing flood risk in the locality.
- viii. 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.

1.13 We can see no legal or logical change in circumstances, either local or national, that changes the reasons for and force of the previous refutation. Indeed, most of the harms that were identified before are even greater with the much larger current application.

1.14 Our detailed consultation response to the draft Canterbury District Local Plan 2045 was submitted in March 2023. This document was, in any case, a draft out for consultation and, unless public consultation is a worthless exercise, it should not have any power until finally approved. With the large change in council membership from the recent local elections (May 4<sup>th</sup>, 2023), the future of the proposed draft plan is now in question. In effect, it has no current electoral mandate. In particular, the scale of proposed housing increase (including that proposed for Littlebourne) has no approved, legitimate basis. Notwithstanding, we wish to comment again on one main point. The draft plan, as it currently stands, describes an artificial construct of Littlebourne as a 'rural service centre' being a *sustainable* rationale for permitting large scale new development. This is used by the applicant as part of its justification, but this is logically flawed. The reality is that like most rural areas around Canterbury most people are compelled to travel out of the Littlebourne village to access affordable routine shopping, secondary schooling, many primary care GP appointments, entertainment, and employment. The extant district local plan recognises these limitations and makes no provision for new development in our village other than the new housing stock numbers already reached by The Laurels and other in-fill development (which already represent around a recent 17% increase in housing stock). A further 300 houses would represent another 40% increase and be a disproportionate expansion of the village.

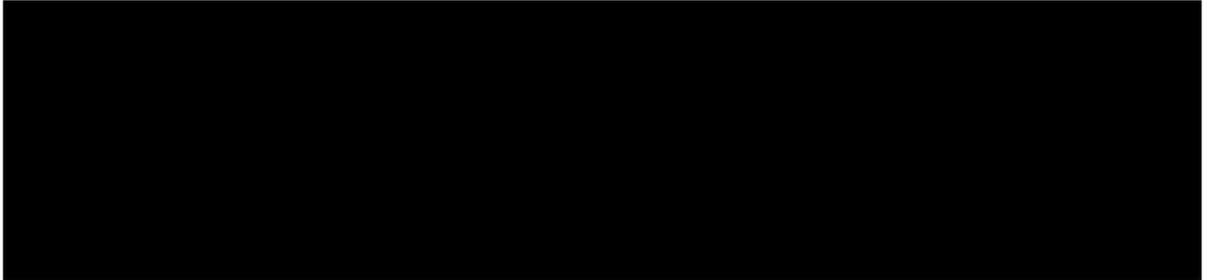
1.15 Our parish council wish is that the Canterbury Council will take our responses to the draft local plan on board and remove thoughts of massive sudden further expansion in our village for the reasons we described. The artificial, major redrawing of the village boundary by ballooning it out to the south over agricultural land to include this proposed large estate is a weak way to try and justify this as part of some kind of coherent internal village growth.

- 1.16 The applicant has applied for outline approval for all matters except access and seeks, with various documents on landscape, sewage etc to allude to most of the reserved matters being manageable in detailed later discussions. However, many of these are so fundamental to the consideration of the outline approval and, in our opinion, unlikely to ever be resolvable that this is a manipulation of the planning process and should be rejected outright.
- 1.17 To the specific issue of proposed access: The main egress point of the proposed site is to The Hill A257 close to several other major junctions (Wenderton Way, Jubilee Road, Evenhill Road), opposite Littlebourne Conservation area housing, and very close to road build-outs which protect the centre of the village from speeding and, in effect, make the road single lane. The Transport review document of the applicant frankly bears little resemblance to our own realities of the road at this point. The Hill is far too narrow for a major, extra, un-prioritised junction with its expected traffic flow. The Hill, in busy periods, is virtually at a standstill in at least one direction. It is also too narrow, even without buildouts, to allow for a pedestrian island which would be essential to allow safe passage from the 300 new houses to almost all the main 'rural service centre' functions that the village is described to possess especially the primary school. The proposed second access point on to Bekesbourne Lane could only ever be a minor de-pressuring of ingress/egress issues and is fraught with problems as this is a very narrow, winding, unclassified country lane at best - so limited that transit is banned for lorries. No other possible point of access on to The Hill within Littlebourne would solve the major problems so we believe that, even on access matters alone, this proposal should be rejected.
- 1.18 On another area of absolute criticality to the outline submission and should not be in reserved matters, is that of sewage management. The applicant proposes a privately managed small scale (not at all 'small' visually) treatment plant where the part treated effluent is passed into a large reed bed area and the subsequent effluent then piped into the Little Stour river (a rare and threatened chalk stream environment recently highlighted in the David Attenborough TV series on Britain 'Wild Isles'). The Little Stour is home to a variety of important and legally protected riverine species such as water vole, otter, beaver, kingfisher, eel, brown trout, and bat species, etc. The applicants propose the local sewage solution be run by a Seven Trent Water subsidiary because they apparently have some experience in this technology. We have great concerns over this. Seven Trent has been repetitively fined for hundreds of thousands of sewage 'spillages' in the recent past. Irrespective of whatever company is involved, this is a relatively novel and little tested technology that would have to work perfectly in perpetuity to avoid the risks of even one significant failure of any plant from this estate causing disastrous effects on the ecology of the chalk stream lasting for many years. Also, the effectiveness of SuDS systems are known to be at risk of deterioration overtime from build up of contamination. The alternative of utilising a connection to the main village sewage system on The Hill is not viable due to its severe capacity limitations which in 2021 winter season led to the necessity of hundreds of tankers being employed to pump sewage and remove to Canterbury treatment works to avoid contamination of the Little Stour.
- 1.19 In Appendix 1 and its annexes A-C, our further detailed objections are given on the applicants Habitat Regulation Assessment, Ecology Appraisal and Village boundary issues. These have been prepared by experts who reside in Littlebourne.

1.110 Appendix 2 highlights the potential impact of the proposed development on the visual landscape of the area; assessed against The Local Plan 2017 policies.

Littlebourne Parish Council urges you to reject this proposal and to advise to the applicant not to re-apply in the future.

On behalf of Littlebourne Parish Council



10<sup>th</sup> May 2023

10<sup>th</sup> May 2023

# Appendix 1

## Introduction

The following sections summarise the findings of the Littlebourne Parish Council Action Group, which are presented in full in the following Annexes to this document:

- **Annex A:** *Information to Inform an Assessment under the Habitats Regulations*; Richard Andrews & Tim Bostock, April 2023; and
- **Annex B:** *Technical Review of Applicant's Ecological Appraisal*; Richard Andrews, April 2023.
- **Annex C:** *Village Boundary Issues and Coherence with Canterbury City Council Local Planning Policy*, Tim Bostock, April 2023.

Readers are strongly encouraged to refer to both Annexes in order to develop a complete understanding of the legal and technical issues summarised below.

The following documents in the Applicant's submission form the basis for these comments:

- *Shadow Habitats Regulation Assessment*, FPCR Environment and Design Ltd. 2023
- *Letter of support Wastewater strategy Land off A257*; Littlebourne, Canterbury, W. Mackveley, Dec 2022
- *Nutrient Neutrality Assessment*, Water Environment Limited, Feb 2023.
- *Ecological Appraisal*, FPCR Environment and Design Ltd., March 2023

## 1. Review of Applicant's Habitats Regulations Assessment

**Annex A** reviews the Applicant's shadow Habitats Regulations Assessment (sHRA), concluding that this falls short of meeting the requirements of a rigorous analysis of factors that could impact on the integrity of the 'European' Stodmarsh sites (SAC, SPA and Ramsar). Significantly, material concerns over the validity and thoroughness of the Applicant's sHRA are raised and discussed below. These demonstrate that it can neither be relied upon to properly inform Canterbury City Council (CCC) of the likely significant effects [beyond all reasonable doubt] of the Proposed Development on the internationally protected Stodmarsh sites, nor does it meet the requirements of an Appropriate Assessment as defined by the Habitats Regulations and Case Law.

The focus of Annex A is Stage 1 (Screening) and Stage 2 (Appropriate Assessment) of the HRA process. It draws attention to significant omissions in the sHRA in relation to the following aspects that have been determined through landmark Judgements both in EU and English Case Law<sup>1</sup>:

- **HRA screening should adopt precautionary principles:** if it is not possible to exclude a plan or project from having any significant effect on a [designated] site on the basis of objective information, either individually or in combinations with others, then an Appropriate Assessment will be required;
- **Mitigation should be considered at the Appropriate Assessment stage**, rather than being used at the screening stage - in this case mitigation of nutrient loading;
- **Functionally-linked land must be considered.** These are defined by Natural England as areas of land outside designated sites (SAC, SPA or Ramsar), yet which are considered crucial to the ecological function of the qualifying features of designated sites. These 'zones of influence' are off-site habitats frequently shared by the same species, supporting and affecting the functionality and integrity of the designated sites in regard to these features. Competent authorities must consider the importance of functionally-linked land in any HRA when assessing new plans or projects to ensure Conservation Objectives for the

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<sup>1</sup> The case law respective to the each of these aspects is examined in Annex A. N.B. The role of EU Law and European Court of Justice stems from post-Brexit legal changes: The European Habitats Directive was originally transposed into UK law by the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended). These Regulations were consolidated into the Conservation of Habitats and Species Regulations 2010, which were later updated in 2017.

site can still be delivered. This is especially relevant given the enhanced contamination risk arising from wastewater emanating from the Proposed Development spreading downstream and affecting several other designated and non-designated sites of considerable importance and national value (including Preston Marshes SSSI - see below);

- **Greater account needs to be taken of in-combination effects when using *de minimis* thresholds**, especially where, for example, nutrient levels are already high or excessive within the designated site/s (i.e. Stodmarsh). In such situations even the smallest levels of contaminants need to be considered.

These legally-derived principles must underpin any effective HRA process, yet they are strikingly absent in the Applicant's sHRA. **Great rigor and detail are essential in justifying the early decision to screen out aquatic pollution as a potential threat to the Stodmarsh site.** More specific points on these omissions are described below.

**Functionally-linked Land.** The Applicant's sHRA only considers the Application Site in its examination of impacts to functionally-linked land, and uses this to screen-out such effects. This incorrectly ignores the important array of designated and non-designated downstream habitats which are not only vulnerable to nutrient enrichment and eutrophication, but are also functionally-linked ecosystems that support qualifying species of the Stodmarsh designated sites. Data just received from Kent and Medway Biological Records Centre (KMBRC; April 2023) shows that approximately 73% of Stodmarsh sites' qualifying species have been recorded in the Little Stour catchment downstream of Littlebourne, e.g. in Preston Marshes SSSI which has strikingly similar configuration to the Stodmarsh Sites. It is therefore surprising that the Applicant's sHRA did not take these key wetland sites into consideration.

**Wastewater Treatment.** In regard to the treatment plant, precise details are provided neither on scale nor specification. Although several options are thrown into the mix (including two septic tank/reed bed systems and a substantial activated sludge / BNR reactor based system) no specific solution is defined. While the *Letter of support -Wastewater Strategy* correctly indicates that any final decision on this would be dependant upon the Environment Agency with Natural England (who are required to undertake modelling to determine discharge permits), the decision to screen out water contamination at this early stage is clearly incorrect.

Of further note, a recent comprehensive (2018) UK academic review of phosphorus removal technologies concluded there was a "dire shortage of treatment options for P removal aimed at smaller scales" especially reliable technologies with low operating and maintenance requirements. The proposed use of plant and technology that has yet to prove itself fully effective over time is a high risk strategy given the high conservation status of the receiving environment. Lessons from the current atrocious situation regarding increasing sewage pollution in most UK rivers through a mix of infrastructural, operational and management inadequacies of the operating companies, must be taken into full consideration in any risk analysis.

**Conflict of Interest.** Further in regard to the treatment plant, an unacceptable Conflict of Interest is evident in that the *Letter of Support* is issued by Severn Trent, the beneficiary company that would ultimately be engaged in designing, building and managing the plant.

**Discharged Effluents.** In regard to the proposal to discharge **combined** effluent (sewage and surface water) via a conduit/pipeline directly into the "Nail Bourne", it is assumed that the Applicant implies discharge into the Little Stour. In either case, these are both low flow volume, high status chalk streams (Habitats of Principal Importance, NERC Act 2006) with periodic dry periods (the Nailbourne may be dry for years on end). Perpetual net outflows of the treated sewage component of this alone are estimated at 55millionL/year or ca.

55mt/day. The risk of organic/inorganic pollutants now regularly found in household effluents is considerable.

**The Dover Connectivity Study.** A ‘connectivity’ study was commissioned by Dover District Council in an effort to overcome the Guidance from Natural England (2020) that all new developments within the entire Stour Catchment should be subject to an HRA Appropriate Assessment given the likelihood of the worsening nutrient enrichment and eutrophication impacts at the Stodmarsh sites. Natural England defines the Little Stour as a sub-catchment of the Great Stour Catchment and thus subject to the same conditions. Despite the study showing a low probability of cross-contamination, Dover Council’s own Local Plan *Habitats Regulations Assessment Final report (2022)* confirms that “The [APEM] model demonstrated that there is potential hydrological connectivity between Dambridge WwTW and the Stodmarsh Lakes System in extreme conditions”. Although Natural England acknowledged the study’s findings (email to DCC), and noted an intention to amend their [original] guidance “in due course”, no material amendment has formally been issued to date.

Furthermore, the existence of direct hydrological links between Stodmarsh sites and the adjacent Little Stour floodplain via the vast network of ditches, culverts and waterways around Grove Ferry Road cannot be discounted especially during regular periods of flooding. Species such as European Beaver now common in both areas, have most likely taken advantage of these channels to spread.

Finally, given that the Little Stour catchment is **shared** by Dover and Canterbury districts, a thorough in-combination assessment is warranted and should have been considered by the Applicant, adopting precautionary principles.

In summary, the sHRA is incorrect in screening out pollution risk at this stage for the following, interrelated reasons which require due consideration in a full Appropriate Assessment:

- Thorough analyses of functional linkages between similar ecosystems within the proposed development’s downstream catchment (including SSSI and LWS) and protected sites at Stodmarsh are required.
- Effluent permits and discharge conditions must be determined by Competent Authorities (Environment Agency/Natural England) following modelling before any attempt to screen out water pollution effects;
- There is no recognition of the pollution factors and risks associated with combining wastewater effluent discharges into the Little Stour chalk stream;
- No formal amendment to Natural England’s original Guidance has been issued to confirm whether the Little Stour catchment is, or is not, exempted from Nutrient Neutrality guidance;
- Precautionary, in-combination analyses of the affects of wide-scale development proposals (>3000 homes) in the Dover/Canterbury shared catchment are needed.

## **2. Review of Applicant’s Ecological Appraisal (EcA)**

**Annex B** reviews the Applicant’s EcA noting a range of potential impacts that are not fully considered. Several of the concerns raised are similar to those presented in **Annex A** regarding designated sites of international importance and the need to consider impacts on functionally-linked land (off-site supporting habitat for mobile species associated with Stodmarsh’s legal protection) that would be affected by aquatic pollution from the Development. The EcA fails to recognise key features downstream of the Development that might be impacted. Features such as Preston Marshes SSSI (noted above), a **designated** [calcareous] wetland which is highly sensitive to water quality change, is once again ignored by the Applicant’s EcA. SSSIs benefit from strict legal protection and are a material planning

consideration.

**Little Stour Chalk Stream.** Local Wildlife Sites (LWS) despite being **non-statutory designations**, are also material considerations in planning decisions, with a presumption against loss or damage to such sites of county-wide importance for biodiversity. **Annex 2** describes the significant array of LWSs that are vulnerable to water quality change resulting from the Development's effluent discharges into the stream. However, the EcA mentions just one of these—the Little Stour chalk stream which is a globally rare Habitat of Principal Importance. Despite this being a relatively pristine stream of global importance (there are only 210 true chalk streams anywhere in the world, and 160 of them are in England), it is given only passing reference by the EcA in relation to water quality: the EcA makes the apparently naive suggestion that on-site sewage treatment with combined surface water discharge into the river will be of 'benefit' (paragraph 5.13 of Applicant's EcA refers). The Applicant's EcA failure to recognise the risk of Development impacts from combined discharges of surface water and wastewater effluents into the chalk stream, or that this is a Habitat of Principal Importance under the NERC Act 2006<sup>2</sup> are serious omissions making decision-making problematic and undermining confidence in the EcA. These precious and unique freshwater ecosystems are at increasing risk from pollutants and over abstraction. The Rivers Trust notes "*if government is serious about protecting our environment, our "green and pleasant land", the fate of England's chalk streams is the litmus test.*" Enhancing and restoring grazing marsh and wetland habitats is a central plank of county-wide targets of the Lower Stour Wetlands Biodiversity Action Plan.

Finally, in addition to its intrinsic habitat qualities and status, the Little Stour is home to a variety of important and legally protected riverine species such as water vole, otter, beaver, kingfisher, eel, river lamprey, brown trout, and bat species, aside from a vast assortment of invertebrates. All of these are known to be vulnerable to changes in water quality, yet no impact assessments are provided. The local presence of the legally protected great crested newt and potentially suitable newt breeding habitat within close proximity to the Application Site have been missed. Likewise, species of principal importance under the NERC Act including skylark, brown hare and harvest mouse all of which have been locally recorded are only weakly addressed, if at all, by the EcA.

**Policy Context.** National and local (Canterbury) policy are mutually coherent in addressing the absolute requirement for any development to conserve and enhance the natural environment, and achieve net gains to biodiversity through coherent and resilient ecological networks, and enhancing natural capital at the catchment level across local authority boundaries. Much of the policy focuses on the need to take an integral / catchment-based perspective across habitats. For further detail on policy is contained in Annex 2. NPPF Chapter 15 paras 170-183 are also relevant in this regard. Local Plan policy (2017) mirrors much of this, highlighting *inter alia* the need to consider "in-combination" impacts of development on internationally designated sites, the need to protect water quality. Policy LB13 is particularly relevant and states: "*Development shall show how the environment within river corridors and river catchments, including the landscape, water environment and wildlife habitats, will be conserved and enhanced. Supply of water, treatment and disposal of waste water and flood risk management should be shown to be sustainable and deliver environmental benefits, within the water environment.*"

Taking the above into full account, it is therefore concluded that (a) adopting the Applicant's sHRA by CCC and consenting to the Application on that basis would not be compliant with the Habitats Regulations or with related planning policy; and (b) similarly, the Applicant's flawed EcA and weak understanding of the Development impact represents a considerable

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<sup>2</sup> This Act imposes a duty on public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity when carrying out their functions in relation to Habitats of Principal Importance for biodiversity.

risk to biodiversity and policy compliance.

### **3. Review of Village Boundary Issues**

The Application proposes the building of approximately 300 dwellings on a greenfield site comprising high quality agricultural land. The site is located outside of the built-up area of Littlebourne and in open countryside. As a result of this location, the proposed development is in direct conflict with policies SP4 and HD4 of the existing Local Plan (2017-2031) under which it is submitted. It further conflicts with similar policies (SS3, R2, R28, DS12) of the emerging Local Plan (to 2045) which has yet to complete the Regulation 18 process.

Of relevance here is the fact that the Applicant's previous application CA/21/01627 was refused *inter alia* on the basis of being "*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.*" (Canterbury City Council, Decision Notice, Oct 2021).

It is reasonable to assume that the rationale for this refusal decision remains intact because the Application has once again been made under the *existing* -rather than *emerging*- Local Plan. Neither should the relevant rationale change substantially from one plan to another: in order to establish a long-term spatial strategy for orderly housing development, it is essential that all policy is at least internally consistent. The Applicant infers that Canterbury policy has in fact "evolved" given that Policy R15 of the emerging Plan had identified the site for residential development, and thus the Council's rationale for refusal on this basis "has been addressed". Yet, given its current Regulation 18 status, the emerging Plan carries only limited weight, with a presumption in favour of the adopted / existing local plan.

Moreover, considering both plans as a whole, the only clear and sensible meaning emerging from their respective, relevant policies demonstrates that no support for developments outside of the built-up areas of local centres is offered other than under exceptional circumstances. This is a perspective that is strongly upheld by the National Policy Planning Framework (NPPF). Indeed, Canterbury Council's strategic vision in regard to service centres such as Littlebourne, has been to support development *within* settlement boundaries recognising that areas outside of these boundaries are designated as countryside where development will generally be restricted (e.g. Policy R2 of the emerging Plan).

**The Application thus fails to meet the required policy requirements in regard to boundaries, and should be refused once again on the same basis.**

## Appendix 2

# Rapid Landscape and Visual Impact Assessment of Proposed Development of Land at the Hill, Littlebourne Application Ref: CA/23/00484

Text by Richard Andrews

April 2023

The Local Plan (2017) includes the following relevant statements and policies related to Landscape:

Paragraph 10.1: "One of the City Council's objectives is to protect and enhance the countryside, acknowledging its own intrinsic value, the diversity of its landscapes, heritage and wildlife and recognising that a high quality rural environment contributes to the economic, social and cultural well-being of the District."

COMMENT: This proposed development directly acts against this stated objective.

Paragraph 10.18

"The Landscape Character and Biodiversity Appraisal (Draft 2012) will be adopted as Supplementary Planning Guidance and will be used as a material consideration when determining applications for development within the rural areas".

Policy LB4

"In considering development proposals, the City Council will take every opportunity to reinforce, restore, conserve or improve, as appropriate, the landscape character of the area in which development is proposed. Development will be permitted if...development would safeguard or strengthen tranquillity, features and patterns that contribute to the landscape character and local distinctiveness of the area; ...The development should have regard to the Canterbury Landscape Character and Biodiversity Appraisal to identify the character areas and features affected."

The Canterbury Landscape Character and Biodiversity Appraisal (2012) lists the relevant "South Canterbury and Littlebourne Fruit Belt's" key characteristics as:

Gently rolling landform with deep loamy soils.

Grade 1 agricultural land intensively farmed traditionally as orchards and hops but giving way to arable.

Strong field pattern created by windbreaks and crops.

The recommended strategy in that Appraisal is to "conserve and improve" this typical character. It also says that the arable areas are generally more visually sensitive due to their lack of screening vegetation. Where these open areas coincide with the ridgelines, the sensitivity is the greatest.

The guidance advises the Council to resist unsympathetic land uses on visually sensitive ridgelines.

COMMENT: As a co-author and Project Director of this supplementary planning guidance, I do not believe that the proposed development is in keeping with this advice, in particular because the site is on land rising up the valley side towards a visually-prominent ridgeline overlooking the village of Littlebourne (see Figures 1 to 3 below). This visual prominence has been made more so by the recent felling of approximately 80 mature trees along the site's eastern boundary shelterbelt. Nor can I see how any form of 115 houses here will "safeguard or strengthen the tranquillity and patterns" of what is currently a farmed rural landscape with relatively open views to three sides.

(Photographs (Figures 1-3) provided on next pages)



Figure 1 View of northern part of proposed development site from the south looking north. Note slope gradient, rising to from east to west to a prominent ridge overlooking the village, with typical landscape features of the "South Canterbury and Littlebourne Fruit Belt".



Figure 2 View from bottom (east) of proposed development site looking across the northern part of site, uphill towards prominent ridge and shelterbelt/windbreak trees (western boundary of proposed site).



Figure 3 View from ridge (west side of site) overlooking northern part of proposed development site and the village beyond. Note that many village houses in the background are obscured by tree leaves due to the summer season. These would be much more visible in the late autumn, winter and early spring period. Also note distant views to the ridge on the other side of the Little Stour valley (right of photo).