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Date: 9th January 2015

Dear Mr Verrall,

RE: Draft Infrastructure Delivery Plan

Thank you for consulting Dover District Council on Canterbury City Council's Draft Infrastructure Plan (IDP).

We would like to make the following comments which we understand will be forwarded to Mr Moore the Inspector that has been appointed to undertake the Examination of the Canterbury City Council Local Plan.

By way of context you will be aware that Dover District Council has an Adopted Core Strategy and Council's Land Allocations Local Plan (LALP) has now been found "sound" by an independent Inspector and is due to go to Full Council to be adopted on 28th January 2015. The Adopted Core Strategy identifies the need for 14,000 homes with an aim to deliver 10,100 homes by 2026.

You will recall that we made a representation to Policy SP6 as the IDP had not been produced at the time of the Publication Draft Local Plan and we stated in our representation that we would like to be involved in the preparation of the IDP. We are, therefore, extremely disappointed that as a neighbouring Local Planning Authority we were not involved in the preparation of the IDP and we had to prompt a meeting with Officers from the Council to discuss our representations rather than Canterbury City Council leading the process. Allied to this we were hoping that IDP would answer and address some of the concerns particularly around sewerage, water and transport issues but unfortunately, there are still some key cross boundary infrastructure issues that we do need assurance on.

Purpose of the Document

Policy SP6 in the Local Plan states:

'The Infrastructure Delivery Plan will identify the scope of infrastructure to be provided; the phasing of such infrastructure linked to development; and the mechanism by which the Council considers that the infrastructure would be best delivered'.

You will recall that when we made our representation we did want to be assured about the deliverability of the sites that had been allocated in the Local Plan, in terms of the level of infrastructure that will be required to support them working in conjunction with neighbouring authorities on any cross boundary issues. We were hoping that the IDP would provide a clear picture of the infrastructure required to support your Plan's development proposals together with an assessment of the implications (if any) that such infrastructure would have on neighbouring districts, including Dover. This would have enabled us to review your assessment and advise you on whether or not we consider there to be any cross-boundary issues. As the current version of the IDP does not provide this assessment we are unable to support it and the concerns that we have previously raised in our representations remain.

It would be more helpful in understanding and assessing infrastructure needs if the IDP was organised by development site, rather than infrastructure type. This would enable the infrastructure needs and implications of each development site to be more readily understood.

S106 Agreements

We understand from reading the IDP that the Council is proposing to use S106 Agreements, bonds and 'other mechanism' – which are unspecified – to deliver key infrastructure. You will be aware that as well as the legal tests in the Community Infrastructure Levy (CIL) Regulations restrictions have been introduced on the pooling of S106 contributions (no more than 5 developments may contribute to the same infrastructure project). If the Council wants to pool contributions from more than 5 developments to pay for an infrastructure item, it will have to use CIL.

There are a number of cost estimates included in the IDP which are for a significant amounts of money (e.g. A2 Wincheap off slip £4,000,000, A28 Wincheap relief road £1,000,000, Sturry relief road £22,700,000) that the Council is seeking to secure via a S106 Agreement. We would, would, however, question whether the above infrastructure could actually be delivered by a S106 Agreement as we presume that due to the cost of some of above infrastructure this may well involve 5 or more development proposals?

Habitat Regulations mitigation measures

We note that for development proposals in the Thanet coast area the average financial contribution per dwelling is £569 which is considerably higher than the 'Thanet Coast and Sandwich Bay SPA and Ramsar Mitigation Strategy' that is being operated by Dover District Council. It would be helpful if the IDP signposted to the justification as to why this is a significantly higher contribution than our Mitigation Strategy.

I would like to re-iterate that as a neighbouring Local Planning Authority we are very keen to work with Officers from Canterbury City Council to try and see if we can resolve all of our representations and the comments that have been included in this letter, prior to the hearings. We therefore, look forward to hearing from you about how this can be achieved.

Yours sincerely



Adrian Fox
Policy and Projects Manager