

Canterbury District Local Plan

Draft Infrastructure Delivery Plan 2014

Response on behalf of

Hollamby Estates (2005) Ltd

January 2015

1. This Statement is submitted on behalf of Hollamby Estates(2005) Ltd (HEL), in response to the City Council's consultation of its Draft Infrastructure Delivery Plan 2014 (IDP), as a background document to the Publication Draft Canterbury District Local Plan that was submitted to the Planning Inspectorate in November 2014.
2. HEL has been promoting housing and mixed use development on its Strode Farm, Greenhill and Bullockstone Road sites in Herne Bay for a number of years including through the Strategic Housing Land Availability Assessment (SLHAA), the City Council's Core Strategy Options Report 2010, the Draft Consultation Local Plan 2013 and the Publication Draft Local Plan 2014.
3. In respect of HEL's response to the Draft Consultation Local Plan 2013 (August 2013) and Publication Draft Local Plan 2014 (July 2014), we would respectfully request that those responses are taken into account by the Local Plan Inspector and the Local Planning Authority (LPA) as part of HEL's overall representations. These go some way to show the degree of detail, work and fine tuning that has taken place to arrive at our current position. This Statement provides further commentary and suggestions with regard to the delivery of the Herne relief road (HRR).
4. HEL has instructed a full team of experienced professional consultants in support of promoting the sites through the Local Plan process and indeed for the purposes of submitting planning applications for residentially-led development across these three sites. It is against this level of detailed assessment and work that has been undertaken that HEL is confident that its market research is accurate and its proposals are robustly based on evidence at this stage of the Local Plan process.
5. HEL wishes to endorse the work undertaken to date by the Council and its officers in preparing the draft IDP and wishes to continue to work with the Council's officers in helping to improve the content, clarity and identified methods of delivery of infrastructure. Foremost in this work is the need to demonstrate how the HRR can be provided.
6. As an over arching document, we consider that the IDP lacks evidence and detail; the viability testing by Adams Integra (Paragraph 7) did not include any negotiations or exchange of detailed information with HEL and was completed using a theoretical housing viability model that did not factor into the assessment the costs of strategic road infrastructure development such as the HRR. We have previously made this response to the Council and Adams Integra (April 2014). Paragraphs 9 & 25 refer to a nil Community Infrastructure Levy (CIL) approach on Strategic Development Sites, but it needs to be clearer as to what this means and what are its implications. We think this means that no S106 financial contributions will be sought towards local infrastructure apart from affordable housing because of the costs of the strategic road infrastructure, but it is not clear.
7. It is HELS's proposal that the costs of the Herne Relief road are to be met by them as the road crosses Strode Farm (this is accepted as HEL owns the land), but that the costs of improving Bullockstone Road, to complete the relief road around Herne, should be met by the landowners/developers of the three strategic development

sites at Hillborough, Herne Bay Golf Course and Strode Farm (Table on Transport Infrastructure Funding in IDP). It is estimated that the costs of this are in the region of £3m but likely to increase. This figure excludes the value of the land which HEL is prepared to offer in order to achieve the revised road alignment.

8. As a starting position, the £3M road improvement costs were an acceptable benchmark figure in the summer of 2014. However, these costs are likely to increase as parts of Bullockstone Road require re-surfacing and re-constructing. There have also been significant increases in base build costs during 2014. A final figure has not yet been concluded by HEL's consultants or agreed with Kent Highways pending further consultation.
9. Paragraphs 59- 62 of the IDP relates to the Herne Relief Road. A Memorandum of Understanding has been drafted but not yet signed because the Council is seeking a level of financial contribution towards the road infrastructure costs based on traffic generation from each of the allocations that will use the relief road. The IDP does not set out how this will be delivered, or rather, has not prepared a traffic distribution model that will show traffic impact and the likely travel patterns from each strategic development site. The IDP cannot rely on a delivery mechanism that does not exist.
10. The VISUM model used by Kent Highways and the City Council for specific sites at Canterbury has not been extended to individual coastal sites at Herne Bay or Whitstable. As such, no traffic impact model has been prepared to assess the impact of the development on the local road network in Herne Bay. Without this, the Council cannot assess the likely use of the relief road from the development of the strategic development sites. Without Kent Highways' own detailed evidence, reliance will have to be made on the developers of the strategic sites to agree on the subjective matter of traffic generation and distribution. HEL has submitted a traffic model to Kent Highways but there has been no feedback on which traffic model Kent Highways and the developers should use.
11. Of equal concern, Paragraph 62 seeks to use a development threshold (although this is not specified) to limit the number of new houses being built on the three strategic development sites prior to the delivery of the new relief road. If this is the case, the IDP should provide evidence that a threshold is required, state what that threshold is, and set clear phasing periods for new development. Or, be clear and state that the delivery of the Strode Farm site is a priority in bringing forward the relief road across its land ahead of the other sites coming forward. The threshold for limiting new development that will use the relief road will be the number of dwellings delivered on Strode Farm.
12. For the above reasons the IDP needs to be improved as far as it relates to the Herne Relief Road.
13. The IDP also provides a 'wish list' for new and existing projects to be funded and overall it fails to relate the impact of development to the need for new infrastructure or to demonstrate the costs of the delivery of this infrastructure in viable terms.

Recognition needs to be given to the difficulties of financing such projects and/or recouping costs over time from developers.