

Email

Our Ref: P3378

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To: Planning Policy Team - Canterbury City Council (planning.policy@canterbury.gov.uk)

From: Lee Evans Planning (karen.banks@lee-evans.co.uk)

Dear Sir/Madam

COMMENTS IN RESPECT OF DRAFT INFRASTRUCTURE DELIVERY PLAN

We have previously submitted comments in relation to the Publication Local Plan and, in so far as this latest round of consultation is concerned, draft policy SP6 and its Reasoned Justification.

The Draft Infrastructure Delivery Plan (IDP) consultation process would appear to have taken the form of an email circular as opposed to a more robust consultation exercise as has been undertaken in respect of the draft Plan itself. Was this a formal consultation process? Who has been notified?

Given that the IDP cannot reasonably be considered as a 'Topic Paper', we remain concerned with regard to the level, standard and form of consultation in relation to this important document particularly given its importance in relation to the delivery of strategic sites across the District.

The Draft IDP would appear to make inappropriate assumptions with regard to a future CIL charging schedule (Funding and Delivery Section, paragraph 27). In recognising that figures quoted are as a result of the background work as carried out by Adams Integra (CDLP11.5), is it appropriate for the draft IDP to make such assumptions prior to (i) carrying out a robust consultation in relation to these findings and (ii) in advance of a draft charging schedule?

The uncertainty that remains with regard to CIL is evident in consideration of the strategy for open space provision. In acknowledging that the open space aspirations for the District, as set out in the 'Draft Open Space Strategy for the Canterbury District 2014 to 2019', may well form part of a future 'Regulation 123 list', current provision has yet to be robustly identified, audited and assessed.

Will the submission Local Plan be able to deliver the required open space provision for the Plan period? The draft IDP does not clarify.

We reserve the right to consider the further details, as they may be forthcoming, throughout the Examination and/or through a further appropriate consultation process.

Yours faithfully Karen Banks For Lee Evans Planning

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