

Planning and Development

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Mr A Thompson
Planning Policy Manager
Canterbury City Council
Military Road
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Date: 18th April 2023

Dear Mr Thompson,

Canterbury Local Plan 2040/41 - Regulation 18 Consultation

Thank-you for inviting Ashford Borough Council (ABC) to comment on Canterbury's draft (Regulation 18) Local Plan to 2040/41.

The Council has now had the opportunity to review the draft Local Plan and supporting evidence; and wish to make the following comments and/or observations:

Development Requirements

The Council acknowledges and broadly supports Policy SS3 (*Development strategy for the district*) that sets out the development requirements and preferred spatial strategy, which aims to steer future development to the most sustainable settlements within the District with the principal focus being Canterbury and the urban areas of Whitstable and Herne Bay.

In particular, the Council supports and welcomes the fact that the draft Canterbury Local Plan intends to meet the minimum average housing requirement of 1,149 dwellings per year to 2040/41 (as calculated using the standard method); in full and within the District's administrative boundaries.

In terms of employment land, the Council notes that the draft Canterbury Local Plan allocates 141,100 sqm of new employment floorspace in line with the 'Labour Demand' scenario. Whilst no concerns are raised in principle with the proposed employment strategy at this time, the Council observes that there is an over-supply of the minimum requirement identified by the the Labour Demand Scenario in overall quantitative terms. The Council accepts the need to plan positively for growth and that this isn't unduly constrained by a lack of site capacity; however, it will continue to monitor the current position and give



consideration as to how this may fit into Ashford's employment strategy as part of the preparation of its own Local Plan to 2041.

The Council has no comments in regards to the identified retail needs and strategy.

Gypsy and Traveller Accommodation

The Council notes the update to Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) dated February 2024.

The GTAA provides an updated position, taking account of existing extant permissions and/or completions recorded between 2020/21 and 2022/23 concluding that there is an outstanding requirement of 54 pitches to 2040. This compares to a lower need figure of 26 pitches for the previously longer plan period to 2045, which was calculated in April 2022.

The Council notes that no Gypsy and Traveller allocations are being proposed as part of the draft Local Plan and that the final strategy for how the outstanding need is to be met is still to be determined as the plan evolves. It is understood that no G&T site submissions were received as part of previous 'Call for Sites' exercises and that the City Council propose to undertake a focused G&T 'Call for Sites' exercise alongside this Regulation 18 consultation and also assess what scope exists to regularise any sites within the district which are not permanently authorised; and whether any existing sites have capacity and/or are suitable for intensification.

It is noted that Canterbury City Council plan to present a five year supply of Gypsy and Traveller sites as part of the Regulation 19 draft. Regardless, windfall figures included in the supporting 'Development Topic Paper' demonstrate that there is evidence of a natural supply of non-allocated pitches, which if to continue, would be sufficient to meet the outstanding need in full. Windfall sites would continue to be supported subject to them being in accordance with the criteria in draft Policy DS5 - Specialist Housing Provision.

Ashford Borough Council are currently in the early stages of preparing a new Local Plan to 2041, and have recently undertaken a Call for Sites exercise. Ashford Borough Council are likely to face a difficult challenge in meeting our own G&T need going forward, in part due to the issues we face around dealing with nutrient neutrality. Evidence currently available suggests Ashford could not practically meet demand for any future unmet need arising within neighbouring authorities. Therefore Ashford Borough Council supports Canterbury City Council's proposed approach to developing a strategy to meet their own G&T requirement in full as part of the Canterbury Local Plan 2040. However, the Council wishes to reserve the right for future comment on any strategy when this becomes clearer at Regulation 19 stage.

Infrastructure

The Council notes draft Policy SS5 (*Infrastructure Strategy for the District*) and in particular criteria 2(e), which requires new development to make provision for, or appropriate contributions towards, any new or improved infrastructure including to a new a new or improved Kent and Canterbury Hospital. This is reflected in other policies such as Policy C5 (*South West Canterbury*), which states 'Four allocated sites (Policies C6 to C10) will together deliver: New hospital facilities at the Kent and Canterbury Hospital;'



However, elsewhere in the document it is acknowledged that this proposal is not confirmed:

‘1.27 .. and the delivery of a new or improved Kent and Canterbury Hospital which remains on the shortlist of options being considered by the NHS.’

‘2.8 The NHS is currently considering proposals for a new and improved Kent and Canterbury Hospital within this SDA, and these allocations would help to facilitate the hospital provision and a new direct access from the A2.’

This is reiterated in the draft Infrastructure Delivery Plan (Oct 2022), which has no entry in the accompanying schedules for a new or enhanced hospital.

This raises a concern in the sense that developer contributions are being sought for a piece of infrastructure that may not yet be forthcoming. Whilst appreciating that this matter might be resolved by the time the Regulation 19 consultation takes place, the uncertainty should be flagged up more clearly and there should be some additional text explaining what alternatives might have to be considered if the hospital facilities are not improved in this location.

Assuming the proposals do go ahead the Council would like to have greater clarity of the implications that a new hospital may have on the diversion of health services and resources away from the William Harvey Hospital; as well as any potential effects on the local highway network within Ashford Borough and with Canterbury District as a result.

Stodmarsh

Like Ashford Borough, a significant part of Canterbury district is situated within the River Stour catchment. Consequently, there is a requirement for the Local Plan to 2040 to address the issue of nutrient neutrality, to prevent further deterioration of the internationally important Stodmarsh Lakes.

Draft Local Plan Policy SS1 (Environmental strategy for the district) criteria 3, seeks to work with its partners to support and sustain the full recovery of the Stodmarsh Nature Reserve designated site and to meet its targets for water quality and improve biodiversity. The Council is keen to continue working actively with Canterbury City Council (and other affected Local Planning Authorities) to address the “Stodmarsh issue” through the delivery of a catchment wide strategy to respond to nutrient neutrality.

Additionally, Ashford is supportive of the proposed draft Canterbury District Mitigation Strategy (dated January 2024) which sets out the proposed approach to nutrient mitigation and supports draft Local Plan Policy DS17 (Habitats of international importance) and Policy C20 (Land to the south of Sturry Road). The approach is broadly consistent with Ashford’s own proposed strategic response, in that larger development sites are required to deliver on-site mitigation wherever possible. However, where an off-site solution is necessary, land has been allocated and/or safeguarded in the proposed Local Plan for the creation of strategic wetlands (at Sturry and along the river corridor) to provide opportunities for strategic mitigation with sufficient capacity to accommodate planned growth over the plan period.

Stour Valley Regional Park



The Council highlights draft Policy SS1 (*Environment strategy for the district*), criteria 8, which makes reference to the City Council working with partners to promote a 'Stour Valley Regional Park'.

The Council acknowledges that the scale and location of a new proposed regional park is yet to be determined, but would welcome the opportunity to be involved in any future discussions with the City Council in moving forward in order to help tackle any cross-boundary issues that may result as a consequence of any future Regional Park designation.

Broad Oak Reservoir

The council wishes to place on record its support for draft Local Plan Policy R17 (*Broad Oak Reservoir and Country Park*), proposes the creation of a new reservoir at Broad Oak.

The reservoir is supported through the South East Water's Water Resources Management Plan (August 2023); and will play a crucial role in helping to relieve issues related to water supply/scarcity within the East of Kent.

Yours sincerely,



Claire Marchant
Team Leader Plan Making and Infrastructure

