

Draft Canterbury District Local Plan to 2040 Consultation

Herne & Broomfield Parish Council response

The plan period being reduced from 2045 to 2040/41.

The parish council welcomes the plan period reduction.

A fall in the number of new homes proposed by a total of 4,149 – from 13,495 to 9,346 over the life of this plan compared to the previous draft plan.

The parish council welcomes the reduction to the number of properties proposed.

There has already been significant development across the district over several years.

Removal of the proposal for an Eastern Movement Corridor, better known as the Eastern Bypass, in Canterbury.

The parish council welcomes the removal of the proposed Eastern Movement Corridor.

The proposed bypass would have been inadequate, being a single carriageway local distributor road rather than a strategic link.

In addition, the proposed bypass was planned to pass through areas of natural importance, which would have had a detrimental effect on the wildlife in these areas.

Removal of the proposed Canterbury Circulation Plan which contained the suggestion that the city should be zoned to remove ‘rat runs’ and force active travel opportunities.

The parish council welcomes the removal of the proposed Canterbury Circulation Plan.

The proposed sectoring strategy was unsustainable given that it would have involved much longer car journeys to get from sector to sector than to travel directly. This is particularly relevant when supermarkets, leisure facilities and medical services are often in a different sector to housing.

Removal of the proposed strategic sites to the east of Canterbury which provided land for a part of the Eastern Movement Corridor and funding.

The parish council welcomes the removal of the proposed strategic sites to the east of Canterbury.

Tackling climate change and boosting biodiversity put even more firmly at the heart of the plan.

National Planning Policy Framework (NPPF) 2021 Policy 14 Meeting the challenge of climate change, flooding and coastal change:

Paragraph 152: “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas

emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

Canterbury City Council (CCC) Planning Policy LB9 Protection, Mitigation, Enhancement and Increased Connectivity for Species and Habitats of Principal Importance states:

“All development should avoid a net loss of biodiversity/nature conservation value and actively pursue opportunities to achieve a net gain, particularly where: 1. There are wildlife habitats/species identified as Species or Habitats of Principal Importance; 2. There are habitats/species that are protected under wildlife legislation; 3. The site forms a link between or buffer to designated wildlife sites.”

CCC Planning Policy LB10 Trees, Hedgerows and Woodland states:

“Development should be designed to retain trees, hedgerows and woodland that make an important contribution to the amenity of the site and the surrounding area, and which are important to wild flora and fauna. New development should incorporate trees in areas of appropriate landscape character, to help restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, help mitigate climate change and contribute to floodplain management. The value and character of woodland and hedgerow networks should be maintained and enhanced, particularly where this would improve the landscape, biodiversity or link existing woodland habitats.”

The parish council welcomes tackling climate change and boosting biodiversity.

Much of the recent development across the district has been built on greenfield sites, with the resulting damage that this has had to the natural environment. The impact on biodiversity and climate change is immeasurable. The City Council must ensure that appropriate mechanisms to ensure any mitigation or compensation measures are secured and delivered.

The parish council would further like to see added to this policy, that not only are the measures secured and delivered but that they are safeguarded into the future. Any mitigation or compensation measures are likely to take years to become established.

Supportive policies for Blean Woodland and Old Park.

NPPF 2021 Policy15 Conserving and enhancing the natural environment:

Paragraph 174 (b): “recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

CCC Policy LB11 The Blean Complex states:

“The City Council will support projects that restore, enhance and connect the valued woodland habitat complex of the Blean. The Council will give particular support to projects

that benefit the landscape through sensitive and traditional woodland practices, and which support the timber market and wider local economy. The City Council will refuse proposals for development that would result in the loss, deterioration or damages the character and integrity of the Blean Complex. Development should provide opportunities for biodiversity improvement within the identified Biodiversity Improvement Areas.”

The parish council welcomes supportive policies for the Blean Complex and Old Park. These are valuable woodland habitats that must be protected from the detrimental effects of development.

A transport strategy that now focuses on better bus services as well as the promotion of walking and cycling to help to persuade people to leave their cars at home, rather than building additional road capacity.

NPPF Policy 9 Promoting sustainable transport:

Paragraph 104 (c): “Opportunities to promote walking, cycling and public transport use are identified and pursued.”

Paragraph 106 (b): “Planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.”

CCC Planning Policy T3 Bus Improvement Measures states: “Planning permission will not be granted for proposals that prejudice the effective implementation of bus improvement measures and fast bus links.”

CCC Planning Policy T2 Pedestrian and Cycle Routes states: “That land will be safeguarded for proposed pedestrian and cycle routes.”

The parish council welcomes a transport strategy that focuses on improved public transport and an increase in active travel.

For this strategy to be effective public transport needs to be accessible, affordable and reliable.

The City Council must lobby the public transport providers to provide and protect these services. It is not sufficient for planning approval to simply state that dwellings need to be within 400 metres of a bus stop, and not require developers to work with the bus service providers to put a bus service in place. To build large scale developments without any access to affordable and reliable public transport disenfranchises the residents that will move there. The inclusion of bus stops within a development creates a presumption that a bus service will exist.

The parish council understands how vital access to affordable and reliable public transport is for the many residents that use it. Until the recent adoption of the new 600, 601 and 602 services, the parish had been well served by the 6 and Triangle routes. The

changes have disenfranchised many residents, especially those that are unable to access the bus service in the centre of Herne Village and are reliant on the bus service to access shops and services. There are many areas that are without a bus service.

The only effective way to reduce the current reliance on cars is to provide effective access to affordable and reliable alternatives. Provision of public transport should be at the forefront of all planning decisions, with the infrastructure and services put in place first. This has not been the case, leaving residents on many large developments without any recourse other than to use their cars to access basic services, such as schools, shops and medical facilities.

Brownfield development sites such as Wincheap now prioritised.

NPPF 2021 Policy 13 Protecting Green Belt land:

Paragraph 141(a): “make as much use as possible of suitable brownfield sites and underutilised land.”

CCC Planning Policy HD9 Empty Residential Property states: “One of the City Council’s aims is for homes that have been empty for more than six months or properties that have remained vacant for a significant period, to be brought back into use. This includes vacant floors suitable for residential use above other uses.”

The parish council welcomes the prioritising of brownfield development sites and underutilised land.

Extensive areas of greenfield land have already been lost to development, with further greenfield sites identified for future development. Safeguarding greenfield sites is vital for preventing urban sprawl and ensuring that rural districts maintain their individual identities.

The parish council would further like to see this extended to cover the increasing problem of abandoned and derelict residential property that exists. The City Council must use the legal powers available to it to tackle landlords and landowners, taking enforcement action if necessary, to bring these properties back into residential use.

A new freestanding settlement on land to the north of the University of Kent in Canterbury.

NPPF 2021 Policy 5 Delivering a sufficient supply of homes:

Paragraph 73: “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).”

CCC Planning Policy R19 Countryside states: “Outside of urban or rural settlement boundaries, as defined on the policies map, within the countryside, new housing

development will only be supported where it protects the rural character and appearance of the countryside.” “The development protects the rural character of the area, including in terms of any cumulative impacts of similar developments, and any adverse impacts on the landscape and heritage are appropriately mitigated.” “The development can be accommodated by the local highway network, has appropriate vehicular access is appropriately accessible by public transport and walking and cycling.” “The development would not undermine the viability of existing provision within the area.”

The parish council raises concerns regarding the impact a development of this scale will have on the existing infrastructure: schools, utilities, roads. It is noted that provision will be made for a new primary school, however children of secondary school age will still be required to travel into Canterbury for their schooling. The main routes through Blean and Tyler Hill are already well used by residents in the coastal towns when transporting their children to school in Canterbury, and this development will only exacerbate the traffic problems that this causes.

The proposed development will close the green gap between Blean and Tyler Hill, creating urban sprawl from Canterbury city centre out to the neighbouring villages. This will have a substantial impact on the rural identities of Blean and Tyler Hill.

A renewed emphasis on monitoring, compliance and enforcement.

NPPF 2021 Policy 4 Decision-making:

Paragraph 59: “Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate.”

The parish council welcomes a renewed emphasis on monitoring, compliance and enforcement.

The City Council must ensure that all development complies to the planning permission granted. This can only be achieved with regular monitoring, particularly on large development sites, and adequate checks being undertaken at completion. Early intervention provides for better outcomes and less reliance on enforcement action once non-compliance has occurred.

South Whitstable - strategic development area

NPPF 2021 Policy 5 Delivering a sufficient supply of homes:

Paragraph 73: “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).”

CCC Planning Policy R19 Countryside states: “Outside of urban or rural settlement boundaries, as defined on the policies map, within the countryside, new housing development will only be supported where it protects the rural character and appearance of the countryside.” “The development protects the rural character of the area, including in terms of any cumulative impacts of similar developments, and any adverse impacts on the landscape and heritage are appropriately mitigated.” “The development can be accommodated by the local highway network, has appropriate vehicular access is appropriately accessible by public transport and walking and cycling.” “The development would not undermine the viability of existing provision within the area.”

The parish council raises concerns regarding the impact a development of this scale will have on the existing infrastructure: schools, utilities, roads.

The proposed development will close the green gap between Whitstable and Chestfield, creating urban sprawl from Whitstable town centre out to Chestfield. This will have a huge impact on the rural identity of Chestfield, as it will effectively become swallowed up within urban Whitstable. Chestfield has already been impacted by recent development sites.

The proposal for an additional access to the A299 at Chestfield will be costly and difficult to achieve to suitable standards due to the level differences, topography, land purchase requirements and the proximity of the Chestfield Tunnel. It is unlikely to be cost effective considering it is only proposed to deal with eastbound traffic. Westbound traffic will still have to travel through Chestfield or South Street to access the A299 or to access the proposed development.

Sustainable design (DS6)

NPPF 2021 Policy 14 Meeting the challenge of climate change, flooding and coastal change:

Paragraph 152: “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

CCC Planning Policy CC2 Reducing Carbon Emissions From New Development states: Development in the Canterbury District should include proportionate measures to reduce

carbon and greenhouse gas emissions. As well as incorporating measures to reduce carbon emissions development proposals shall show how they have taken account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”

The parish council welcomes the need to support as much renewable and low carbon energy as possible. Developers must be required to have the necessary infrastructure in place to facilitate the use of renewable and low carbon energy.

All large buildings should be oriented in such a way as to take advantage of solar gain. There should also be incentives to encourage owners of large commercial and farm buildings to install solar panels.

Infrastructure delivery (DS7)

NPPF 2021 Policy 5 Delivering a sufficient supply of homes:

Paragraph 73: “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.”

CCC Planning Policy SP5 Infrastructure Delivery Plan states: “The Council will prepare an Infrastructure Delivery Plan for the allocations set out in the plan, and will also set out its proposals for the use of s106 agreements and similar mechanisms, and Community Infrastructure Levy. The Infrastructure Delivery Plan will identify the scope of infrastructure to be provided; the phasing of such infrastructure linked to development; and the mechanisms by which the Council considers that the infrastructure would be best delivered.”

The parish council raises concerns that large scale developments have the infrastructure in place before any dwellings are occupied. Too often dwellings are occupied long before the necessary infrastructure is in place, with incomplete roads and no services or provisions available for the new residents. There are times when expected services and provisions are not completed at all.

Tourism development (DS11)

CCC Planning Policy TV2 New Tourism Development states: “Planning permission will be granted in or on the edge of town centres for proposals to provide new tourism

development including hotels, guesthouses, bed and breakfast, self-catering accommodation and new visitor attractions.”

The parish council raises concerns regarding the inadequate level of visitor accommodation in the Herne Bay district. More investment is needed to provide sustainable visitor accommodation, which will in turn provide employment opportunities for local people.

Much of the visitor accommodation provided is supplied by Airbnbs, which can have a detrimental effect on the local area. Of particular concern is the impact it is having on the long-term rental housing market. This has resulted in a serious shortage of rental property available, with many landlords preferring to switch to short-term holiday lets instead. In addition, property for sale is being purchased with the sole intention of being used for short-term holiday lets, further reducing the available housing stock. Robust legislation needs to be put in place to prevent areas becoming ghettos of second homes, pushing out local people.