

Alexander Gunyon

From: C Brown [REDACTED]
Sent: 03 June 2024 16:35
To: Consultations
Subject: FW: Consultation : Draft Canterbury District Local Plan to 2040 Pt 1of 2

Categories: Green category

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From: [C Brown](#)
Sent: 03 June 2024 12:30
To: consultations@canterbury.gov.uk
Cc: [CCC Planning](#)
Subject: Consultation : Draft Canterbury District Local Plan to 2040 Pt 1of 2

Part 1 of 2

[REDACTED]

Dear Canterbury City Council

I have the following comments and observations on the above Draft Local Plan, using your headings which have been shown in bold.

1. Spatial strategy for the district (page 7)

1. Paragraph 1.12 of the above advises that “Wherever possible, the council will prioritise the redevelopment of previously developed land and this plan includes a range a brownfield allocations as part of a brownfield-first approach.” This is in line with para 123 of NPPF December 2023 which advises that “.... Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or “brownfield” land.”

2. However the following paragraph 1.13 of the above **Spatial strategy for the district** notes that “...., the availability of such land is limited and, to meet the level of development set by national policies, further development on agricultural land is necessary.”

3. In contrast, the NPPF December 2023, under paragraph 181 footnote 62, advises that “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.”

4. Given the above NPPF requirements, to what extent have the proposed “greenfield” strategic development sites in the Draft Plan (eg Policies W4 Brooklands Farm (page 81) and W6 Bodkin Farm (page 89) which I am aware have previously been cultivated) have been evaluated and prioritised for development?

Food Security (UK Food Security Index 2024 published May 2024)

5. With respect to the use of agricultural land for food production, the above government publication is its first release of a new annual UK Food Security Index.

6. Under the heading (page 6) “Overall assessment of UK food security” and sub heading “Strong production and trade” it advises that “.... The UK maintains domestic production of all food available in the UK at around 60% of consumption and indigenous food at 73% (2022 figures) and continues to see rising productivity,...”. Interestingly, under page 7, it advises that food security in fruit is 17% and for vegetables 55%.

7. In short, the principal use of agricultural land for food production seems a prudent approach in these uncertain times given the increasing effects of climate change combined with political turmoil abroad potentially affecting food imports.

Housing Need Assessment to 2040

Policy SS3 - Development Strategy for the district (page 17)

8. Under the above policy paragraph 1(a), I note that the Draft Plan calculates that an average of 1149 new dwellings per year are required to meet the housing need based on NPPF (Dec 2023 criteria para 61). Also that the council does not believe that an exceptional circumstance can be demonstrated (NPPF para 61 : footnote 25). Development Topic Paper (February 2024) paragraph 2.7 refers.

9. You will appreciate that the requirement to meet such a housing need requires a very large annual financial investment over many years including planning expertise, land availability, materials, house construction and its subsequent maintenance together with the provision of upgraded or new infrastructure including Public Utilities associated with such developments to mitigate any adverse environmental, educational, medical and traffic, plus other effects due to the lack of infrastructure capacity to meet the needs of new development. Additionally with climate change in mind it is also important to ensure that any such developments are not only sustainable but resilient to deal with future climate demands and also meet net zero emissions by 2050. It would seem that the council’s approach is to “predict and provide” and then to identify commensurate development within the Draft Plan to meet this target.

10. On this basis is not clear to what extent the Draft Plan is maximising the use of the existing housing stock within the district (including long term empty housing and the conversion of commercial premises to residential use where appropriate) thereby making best use of what we already have.

11. On a separate longer term point, it is not clear what the likely effects of the current Draft Plan development proposals could have on future Local Plan housing aspirations when they are considered again as part of the Local Plan process in about 5 years time and beyond. In short, to what extent are we constraining or creating disproportionate financial, environmental or other adverse effects on future development proposals in the Canterbury district, possibly (and unwittingly) establishing unwelcome precedents or legacies?

2. Density of Populations in Canterbury District and adjoining Districts + Kent, SE England & England

12. Below is a table which sets out the density of persons per kilometre squared for Canterbury District together with its 5 adjoining districts plus the figures for Kent, SE England and England, in ascending density order. The data is based on Kent County Council, Kent Analytics Statistical Bulletin December 2023 “2022 Mid-year estimates : Total population in Kent”.

District	Persons / km2
Ashford.....	230
Folkestone and Hythe.....	310
Dover.....	370
Swale.....	410
England.....	440
Kent.....	450
SE England.....	490
Canterbury.....	510
Thanet.....	1,360

13. From the above density figures, Canterbury has the highest density, apart from Thanet where their density is some 2.6 times greater than Canterbury's. Ashford has the lowest density in Kent of 230 persons /km², which is about half that of Canterbury's.

14. The effect of the high density in Thanet District can be seen by the coalescence of the coastal towns of Margate, Broadstairs and Ramsgate which I suggest should be avoided between Herne Bay and Whitstable by maintenance of the Green Gap, "Policy DS 19 - Habitats, landscapes and sites of local importance" paragraph 5 (page 191) refers.

15. Canterbury district's population density is broadly similar to SE England's but apart from Thanet, it is greater than its adjoining neighbours, in particular, Ashford, Folkstone & Hythe, Dover and Swale. In addition, Canterbury is home to the University of Kent and Canterbury Christ Church University where I estimate the combined University student population to be about 30,000.* Although not continuously resident in Canterbury, they do consume resources when they are. The adjoining districts do not have similar higher educational establishments within their bailiwick which when coupled with the World Heritage Site of the Cathedral complex and its associated tourism, Canterbury District's future development needs to be handled with the greatest of care in order to retain its unique character. In short, it would seem that in population density terms, Canterbury District is bearing more than its fair share of meeting the NPPF housing quota compared with the majority of its adjoining Districts.

*Based on The Sunday Times "Good University Guide 2023" figures for undergraduates and post graduates"

The Council's Move from road building towards a Public Transport-led approach

Draft Canterbury District Local Plan 2040 : Introduction and consultation (page 3)

16. The final paragraph advises that "*The revised draft plan now responds to the concerns raised by our community by shifting the emphasis of the transport strategy away from road building and towards a public transport-led approach, advocated by national policy.*" The "**Vision for the district to 2040 : Improved connectivity (page 8)**" and the "**Strategic objectives for the district : Bullet point 7 (page 9)**" expand on this theme.

Movement and Transportation Strategy for the district (page 18)

17. Paragraph 1.50 advises that "*High numbers of short trips in the urban areas are currently taken by private car, and there has been widespread feedback that the existing infrastructure for sustainable transport, such as for buses, cycling and walking, is currently not adequate to provide realistic alternatives for many residents....*".

18. Paragraph 1.54 advises that "*For the city of Canterbury, the council's Draft Transport Strategy (2024) focuses on the incremental upgrade and improvement of public transport services and active travel routes which, alongside measures to moderate vehicular pressure on the city centre, will lead to a significant reduction in the proportion of journeys by private car.*"

Policy SS4 - Movement and Transportation Strategy for the district (page 20)

19. Paragraph 2. advises that "*A new bus-led transport strategy will ensure people have a high-quality sustainable transport options for travel that will reduce congestion, improve air quality and enhance the city centre environment and its heritage.*"

Key infrastructure requirements include:

Paragraph 2(a) improved public transport connectivity across the district, with additional bus services, bus priority measures and enhanced park and ride infrastructure, and upgrades at railway stations in the district:"

20. The above paragraphs 16 to 19 inclusive illustrate the council's proposal to shift the emphasis of the current Draft Plan from road building solutions towards a Public Transport-led (PT) approach with the benefits of lower traffic flows and improved air quality among other sustainable goals.

21. I feel that this is a very positive step which I agree with in principle but I am not fully convinced of its robustness and suggest that there are some issues which need to be addressed if it is to be a success, as discussed below:

The proposed Modal Shift from car to PT, cycling and walking.

(a)One issue would seem to be the difficulty of persuading the public in general to use sustainable modes of transport especially for short journeys after having so many years of having the convenience of using a car.

However in some cases, walking or cycling may not be feasible options for various reasons including advanced age, those with disabilities or other factors. In this situation taxis or possibly use of an autonomous vehicle could be an option in the future.

(b) I note that the council under Policy SS4 paragraph 5, will promote the use of Park and Ride sites as transport hubs but feel that the promotion of such sustainable options needs to be given very wide coverage and done in parallel with other authorities including KCC, bus operators and the like plus the media in all its forms in order to get your message across.

(c) A further difficulty could be in the programming and delivery of the PT-led approach in that it relies to some extent on the local bus company to provide additional bus services and Southeastern rail to arrange the upgrading of railway stations in the district. They are private companies who have their own operational requirements: as such their cooperation in the phasing and delivery of their elements of the PT-led proposals would seem crucial to its success.

(d) In the event of the introduction of the PT-led proposals such as the reduction of car parking spaces or the reallocation of road space plus other capacity restraints proving too onerous for some drivers, they may then decide to divert to the Westwood Cross Shopping Centre where there is free car parking space for 1500 cars or to some other retail centre instead of heading for Canterbury.

The Development of a New Town

22. Perhaps this is a matter for future Draft Local Plans, but it is, I suggest, something that should at least be considered as a possible option to the rather ad hoc approach to housing development allocations in Herne Bay and Whitstable being focussed generally on the corridor between the A2990 and A299: Duncan Down, Strode Farm and Hillborough being exceptions, although these sites are located adjacent to either the A2990 or A299.

23. The development of such sites potentially puts pressure on the existing infrastructure, including drainage systems (surface water and sewage), educational facilities, hospital and dental services, plus raising highway capacity issues and the like which have either to be upgraded or new systems installed causing disruption to existing residents during the construction phase or phases for larger sites. The provision of any necessary educational or medical facilities plus their staffing does not always occur in parallel with the progress of development, which can be another concern for existing residents.

24. The concept of new towns has been established for many years, Crawley being an example in West Sussex and Milton Keynes in Buckinghamshire. However, emerging new town sites are in progress: examples in Kent being Ebbsfleet Valley and Otterpool Park, near Hythe, the latter receiving outline planning permission in April 2023.

Regards

C Brown

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Alexander Gunyon

From: C Brown [REDACTED]
Sent: 03 June 2024 16:05
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Part 2 of 2

[REDACTED]

Dear Canterbury City Council

I have the following comments and observations on the above Draft Local Plan using your headings which have been shown in bold.

Policy W6 - Bodkin Farm (page 89)

As you will be aware, this strategic development site is the subject of planning application No CA/24/00224 where consultations closed on the 22 March 2024. I commented on this application in my two emails of the same date. My abbreviated comments follow:

1. The Draft Plan proposals include the construction of about 250 new homes: in addition a new secondary school with a 6th form is included in the development. The site is wedged shaped and bounded on its northern side by the A2990, south western side, partly by Maydowns Road and eastern side by the Herne Bay -Whitstable Green Gap (HBWGGap). However the extreme western end of the wedge shape has not been included in the Draft W6 proposals, I assume remaining as an isolated part of the HBWGGap.

2. At first sight the above proposals would seem to conflict with "**Policy DS19 Habitats, landscapes and sites of local importance**" (page 191) of the Draft Plan on various points. In particular, paragraph 5 of the policy is relevant in this case as it deals with designated Green Gaps which were confirmed under the "Canterbury District Green Gaps Review (2022)" of which the HBWGGap was confirmed along with 10 other sites.

3. The HBWGGap is not only covered by the general restrictions of Green Gaps under Policy DS19 which in summary include:

1. A limitation to sports and recreational uses;
2. Not significantly affecting the open character of the Green Gap or;
3. Affecting coalescence between existing settlements;
4. Does not result in isolated and obtrusive development.

But additionally include:

5. Education, outdoor leisure or allotments may be considered as suitable uses;
6. But any proposal must not result in a material expansion of the built confines of Herne Bay or Whitstable.

4. In my view the development proposed under W6, which includes a new secondary school plus 6th form, sitting in isolation on higher ground at the eastern end of Maydowns Road, is at odds with all of the above requirements. In addition, if permission were granted it could lead to the development of the extreme western end of the wedge. This development has also to be seen in the context of the proposed adjacent strategic development site under “Policy HB4 - Land to the west of Thornden Wood Road” as discussed below.

Policy HB4 - Land to the west of Thornden Wood Road (page 98)

5. The Draft Plan proposals include the construction of about 150 new dwellings, a new secondary school plus 6th form is included in the development. The site is broadly anvil shaped, part of which borders the A2990 on its northern side, pointing towards the west where it faces the eastern site boundary of the Bodkin Farm site (W6). At their closest point, I estimate that the two site boundaries are about 100m apart. Like W6 (Bodkin Farm), this site also sits within the HBWGGap and falls to be considered in the same manner under Policy DS19 mentioned above.

6. In short, the development appears at odds with the Policy requirements of DS19. In terms of coalescence, this effect would be amplified by the presence of the Bodkin Farm site, which if granted permission could potentially lead to pressure to develop the Green Gap between the two sites and beyond, which I suggest, would create an unwelcome precedent.

Green Gap Policy Background : Land at Bodkin Farm

Planning Inquiry into Application Ref: CA/14/01319/OUT
Land at Bodkin Farm
Appeal Ref : APP/J2210/A/14/2227624

7. Following the Public Inquiry in August 2015, the Inspector issued their dismissal decision letter on the 16th October 2015.

8. The Inspector’s policy assessment of the Herne Bay and Whitstable Green Gap is set out in paragraphs 13 to 34 of their decision letter together with their conclusions at paragraph 50 are, I suggest, relevant to the DCDLP 2040. I appreciate that the PI took place before the adoption of the CDLP 2017, however there are long standing commitments to the Green Gap stemming from the Local Plan Inquiry of 1997 (para 15) and the importance of the Green Gap lies in its separating function (para 26).

9. For reasons of space I have not reproduced the above paragraphs from the Inspector’s decision letter or included a copy of the Inspector’s letter in this submission on the basis that you will no doubt already have a copy of their letter as the City Council were represented at the PI. The Planning Inspectorate’s Appeal Ref is: APP/J2210/A/14/2227624.

10. In summary, the protection of the Green Gap between Herne Bay - Whitstable has been established for many years being confirmed in the adopted 2006 Canterbury District Local Plan (CDLP). The Inquiry Inspector at the Bodkin Farm planning appeal of 2015 confirmed that development at this site would be contrary to Green Gap Policies TC26 and R8 which were current at that time. Subsequently Green Gap policy was maintained in the adopted July 2017 CDLP under “Policy OS6 Green Gaps and Policy OS7 Herne Bay and Whitstable Green Gap”.

11. Accordingly, it is suggested that Draft Policies W6 (Bodkin Farm) and HB4 (Land to the west of Thornden Wood Road) should be revisited.

Policies W6 and HB4 - Travel / Traffic Implications

Proposed Vehicular Access to Proposed Development Sites and Toucan Crossings.

12. Both Policies, W6 and HB4, require the provision of at-grade vehicular accesses to the A2990 plus Toucan crossings. However only indicative details of the proposed junction locations are given, with no information on the Toucan locations. However, the W6 planning application does provide more information on these points.

13. The current speed limit on the section of the A2990 where the proposed accesses are indicated is 60mph however I understand that the applicant for the W6 Bodkin Farm site proposes to introduce a 30mph speed limit in the vicinity of their proposed access, I assume through a Traffic Regulation Order promoted by Kent CCC as Highway Authority for the A2990. There are very few

existing accesses on the 60mph section and all are private apart the access to the Herne Bay Recycling Centre (commercial access only) and Johnsons garden centre. In general, vehicular use of these accesses is low.

14. The proposed accesses under Policies W6 and HB4 would, if implemented, introduce two at-grade junctions on the A2990 with potentially high volumes of turning traffic during school term times, especially during the morning traffic peak flow of 8am to 9am. The afternoon traffic flow peak of 5pm to 6pm is likely to be less affected, however both junctions would be sited on a currently high speed section of road and, depending on their configuration, could have road safety implications. The proposed introduction of the Toucan crossings on this section of the A2990 is also, I suggest, a matter that needs careful consideration for road safety reasons.

15. Both Policies W6 and HB4 propose secondary schools with 6th forms some of whose students are likely to make use of the existing nearby Chestfield and Swalecliffe (C&S) railway station. However I understand that the station is not DDA access compliant and would also mention that unfortunately the connecting highway beneath the railway tracks is narrow, as is its single footway located on the eastern side which makes two-way pedestrian passing movements difficult. This raises safety concerns for its greater use by school students especially during term times.

16. While accepting the need for the greater provision of secondary education in the District, the need for two such schools in Greenhill Ward, in close proximity to each other on the A2990 under Policies W6 and HB4 is not at first sight clear to me for the following reasons;

(a) There is already a secondary school with a 6th form in Greenhill ie Herne Bay High School in Bullockstone Road which is approximately 2km from the mid point between proposed school sites W6 and HB4;

(b) If it is decided that the proposed A2990 site is the most appropriate location, then it is not clear why two schools are being proposed in close proximity, when one school site of equivalent student capacity would seem to be more economic to construct, maintain and operate or is there a countervailing factor that I have missed?

17. The C&S railway station does not have any dedicated car parking unlike that provided at Herne Bay and Whitstable railway stations.

18. In traffic terms, both Policies W6 and HB4, if implemented, would increase traffic flows on the A2990 particularly during term times with consequent adverse traffic effects on the existing closely spaced roundabouts at Chestfield Road and Reeves Way, the former road connecting with the highway under the railway tracks at C&S station. See also paragraph 21 below.

Whitstable urban area (page 77)

19. Para 3.7 advises that *“The strategy for Whitstable is to focus development where it can unlock opportunities for significant infrastructure investment; namely a new secondary school to the north of Chestfield, new A299 slip roads to the south of Chestfield to relieve congestion and a new park and bus facility to the south of Duncan Down to serve the town centre.”*

Policy W3 - Whitstable urban area (page 78)

20. Paragraph 2 advises that *“New slip roads on the A299, together with a new park and bus facility at Land to the South of Thanet Way, with a fast bus link to the town centre, will be provided, with the aim to reduce traffic in and around the town centre.”*

21. What is being proposed under policy W3, is that eastbound A299 traffic destined for Whitstable town centre is diverted to leave the A299 beyond the existing Whitstable grade-separated junction between the A299 - A290 at Clapham Hill, to connect with the existing Chestfield Road (C classified) which passes north-south through Chestfield village.

22. After leaving the A299, diverted traffic would have to pass northwards through Chestfield and then filter through the local Whitstable highway network in order to get to the high street and harbour areas. Such a diversion would cause adverse environmental, planning and traffic issues on Chestfield. Given that only east facing slips are being proposed at this time, returning London bound traffic to the A299 would need to use the existing A299 / A290 junction at Clapham

Hill. However should such eastbound slips be approved then it is likely that west facing slip roads would follow at some point in the future, all unwelcome precedents.

South Whitstable - strategic development area (page 79)

23. Paragraphs 3.9 to 3.18 set out in more detail the strategic development proposals with a concept masterplan at page 80. In my view it is unfortunate that the masterplan does not show the A299 / A290 junction at Clapham Hill, Whitstable which is part of the existing local highway network.

Policy W4 - Land at Brooklands Farm (page 81)

24. Paragraph 4 (c) advises that *“Provide primary vehicular access from new east facing junctions on/off the A299 New Thanet Way;”*

25. As discussed above under Policy W3, the introduction of the east facing slip roads would seem to me to create an unwelcome precedent and have very wide environmental, planning and traffic implications for Chestfield village. However, I note that the new grade-separated junction is being conditioned on a single development under Policy W4 - paragraph 4 (c), to connect with Chestfield Road (C Classified). If implemented it would appear that the proposed eastbound off slip road would be in close proximity (less than 2 km) to the existing grade-separated junction between the A299 - A290 at Clapham Hill, Whitstable which I assume will need to be approved by Kent CC as Highway Authority for the A299.

Regards

C Brown

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