

3rd June 2024

[REDACTED]

We agree with the following elements of the draft LP 2024

- BUS FIRST STRATEGY
- REMOVAL of EASTERN BYPASS
- We welcome the support for an extension of the platforms at Sturry Station
 - BIODIVERSITY Net GAIN in principle but am not convinced of claims that BNG can be created in many proposed sites

We are not in agreement with the calculation of an annual new housing supply target for the years 2025 – 2040 reported in the Local Plan. We think there is a need for re-assessment of the figures.

- ◆ The current 2017 Local Plan committed Canterbury to building an additional 16000 houses
- ◆ The new 2040 Draft Local Plan commits Canterbury to building an ADDITIONAL 9000 PLUS houses by 2040

As ACRA states:

- Consider the scope for the Council to invoke exceptional circumstances, both demographic and non-demographic, pursuant to revised paragraph 61 of the NPPF, to justify a non-standard methodology for calculating an appropriate annual new housing supply target.
- Analyse the exceptional circumstances which are relevant in Canterbury District and assemble arguments as to why these circumstances would justify a non-standard approach.
- Having analysed the exceptional circumstances which could be argued, re-run the 2021 calculations and assessment, using the most recently available demographic statistics and trend analysis available for Canterbury District, and making proper allowance for the protection inter alia of ancient woodland, land of high agricultural value, the AONB, SSSIs, river water quality, chalk aquifers and the setting of the World Heritage Site within the District.

Housing Overview

The 2018 Census says the Canterbury district's population will grow by 9,886 people to 170,000 by 2040 in 8,281 households (at 1.2 people per household), but the Draft Plan is for 22,400 houses at the CCC occupancy rate of 2.37 per dwelling, equating to 53,000 people. In summary, the Draft Plan adds up to 40,000 more people than indicated by ONS 2018, we are building houses for people outside of the area. which is not sustainable. The

consequences of the imported population on emissions, traffic and resource use are not mitigated within either the infrastructure or transport plans. In particular, sewage provision is unfunded, uncosted and unplanned, and it is assumed somewhat hopefully that it will be delivered by others.

The Plan is silent concerning whether development will be permitted if nutrient neutrality is breached.

The Plan does not deliver carbon neutral development. While it seeks to add 30% to the population (160k to 210k) it does not calculate the carbon consequences of such a large increase, in particular the emissions consequences of the additional private vehicles on the roads. We are already at emissions limits for NOx and particulates and these require a 78% reduction, not an increase.

THE ISSUES: ♦

DELIVERY Canterbury delivers currently approx. 600 dwellings per annum (dwp) in the current 2017 plan and is behind target

- ♦ This is based on the 800 Dwellings per annum delivery target in the current 2017 Local Plan
- ♦ How are they proposing to deliver 1200dwp in the 2040 Plan? If they do not do this then Canterbury will lose Control of its planning, with control then from Westminster and local issues virtually ignored

As the Association of Canterbury Residents Associations have stated, "Canterbury City Council has taken a favourable view of redevelopment of a few brownfield sites in the district for partial residential use, Kingsmead being a recent example. However, there was no sign in 2019 or 2020 of the council thoroughly evaluating brownfield potential and revisiting housing supply site allocations on greenfield land accordingly, in order to comply with the revised NPPF. That should have been done, even if it would require a recasting of part of the Local Plan." This should be a principle of all new developments and to go with the "easy option" for developers represents a dereliction of duty on behalf of CCC>

RURAL STRATEGY

Village character

Although defined by the LP as a 'Service Centre', both Sturry and Broad Oak are villages with a long history. Sturry has a large number of ancient, listed buildings and the centre is registered as a Conservation Area. Extending the settled area with developments that owe more to developer's desires rather than reflecting the local vernacular will diminish the built character and, as a consequence, the quality of life for its community

Why is Sturry no longer classified as a village? .

In January 2021, Robert Jenrick, proposed [changes to the National Planning Policy Framework](#) to place greater emphasis on beauty and place-making, and to ensure that all new streets are lined with trees.

In addition, the 190-page '[Living with Beauty](#)' report published in January 2020 proposed a new development and planning framework, with 3 principle goals – to ask for beauty, refuse ugliness and promote stewardship -ones to which the LP should aim to achieve.

<https://www.gov.uk/government/news/all-new-developments-must-meet-local-standards-of-beauty-quality-and-design-under-new-rules>

- There are 224 new houses proposed for Sturry and Broad Oak (and 150 on the Westbere/Sturry border, R5, the Bread and Cheese Field) which are in addition to the already approved plans for 1050 in the 2017 plan.
- All but 12 are on greenfield sites around the edge of the village. This is in direct contradiction of the new administration's stated preference for building on brownfield sites.

The largest of these sites in Sturry and Broad Oak, R 9, in Popes Lane, proposes building on grade 2/3 arable land, and is a repeat of a proposal that has been turned down twice in the past. The LP states that building cannot take place until the Sturry Link Road is completed. This ever-increasing costly project has been delayed for some years and there is no sign of commencement (and essentially funding being available) from the yet to be built 630 homes adjacent to the Link Road. It seems pointless to add this project to the local plan at this stage.

NON- EFFECTIVE STURRY LINK ROAD

AS CPRE state, .

We are particularly concerned with respect to the cumulative impact of all proposed developments across the villages of Sturry, Broad Oak, Westbere, Hersden, and Fordwich. Many of the proposed developments appear to be driven by the need to fund the Sturry relief road, a project estimated to cost £41.6 million. There is widespread scepticism about the effectiveness of this road, as it will ultimately feed back into the bottleneck of the A28. This could render the relief road ineffective in alleviating traffic congestion, thereby failing to justify the substantial investment – and with it all the sacrifices and breaches of planning policies imposed on this parish in order to deliver it.

AS KCC struggle to provide much-needed essential services to the population, this ineffective White elephant is a total waste of much needed funds in a practically bankrupt county council!

Wastewater

It is also the case that the Sturry Road water treatment centre is currently at capacity, with no planned expansion until 2030. This raises serious concerns about the ability to manage increased wastewater from the new developments, leading to potential pollution increases in our already over-burdened rivers. We should accept no further developments until this basic right to clean water and efficient wastewater treatment has been resolved!

R5 -BREAD and CHEESE FIELD- OBJECT

This site is at the S.W. side of Hersden and is proposed to contain 150 new dwellings. The footprint of Hersden as existing and recently extended demonstrates low quality planning, as it is dispersed along the A28, which carries over 20,000 vehicles per day. The community amenities are also not focused clearly on a centre. At 1 (b) "consideration of need for additional local shopping and community facilities" is proposed which will further disperse facilities and compete with those existing and separately proposed. There continues to be no attempt to create a nucleated community, quite contrary to 2(b) and (c). In addition R5 destroys an important green gap between Hersden and Westbere but the Plan is silent on this.

R9 -LAND NORTH of POPES LANE-OBJECT

1998, 2018 and now 2023; the third application to build on our precious open space used by so many to walk their dogs, recharge their batteries and connect with nature. We are exceedingly short of public open spaces for the Sturry and Broad Oak community. Whilst official figures may count Thornden Wood this is not within easy walking distance and we have precious little in our large village in the way of communal "open spaces.

This Land North of Popes Lane (R9) is a 9.31 hectare field which may be grade 3 agricultural land but it has still usefully contributed to the food chain for many years. I have been a resident of the area for 29 years and there has always been either a cereal crop or a cover crop (a crop which is not taken to harvest but helps protect and feed the soil).



The CCC policy in the Draft Plan acknowledges the importance of **safeguarding the best and most versatile land in Policy DS12**. This is echoed by Natural England's guidance on assessing development proposals on agricultural land, which states that the best and most versatile agricultural land should be protected from significant, inappropriate or unsustainable development proposals. This objective is also captured in the National Planning Policy Framework which states that planning policies and decisions should contribute to and enhance the natural and local environment by recognising 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.

This Land North of Popes Lane (R9) is a 9.31 hectare field of grade 2/3 agricultural land but it has still usefully contributed to the food chain for many years. I have been a resident of the area for 29 years and there has always been either a cereal crop or a cover crop (a crop which is not taken to harvest but helps protect and feed the soil).



We have recently lost open space with the development in Broad Oak of 456 houses commencing which closed a popular footpath and we have the prospect of another 650 houses lower down Sturry Hill which were given outline planning permission in 2021. Whilst the footpath on the eastern edge of the Popes Lane field would remain, it would be much changed in character running alongside houses and the rear of the water treatment plant! another removal of easily accessible spaces for our residents.

With respect to landscape impact, development of this land could result in the coalescence of Sturry and Broad Oak, as the site extends the village envelope to next to the very small green gap. The site is close to areas known for newts with locals stating it to be a habitat for species such as slow worms, bats, newts, and nightingales. There is Ancient Woodland adjacent to the site.

SARRE PENN

In addition, the hydrological connectivity of the site via the Sarre Penn could lead to increased downstream flooding through the loss of permeability and introduction of significant new hard standing and non-permeable surfaces due to a conversion from countryside to urban settlement. Furthermore, given the existing capacity issues of the sewage treatment works, leading to increased untreated sewage discharges during periods of heavy rain, the extent to which adding 110 homes to the system will exacerbate the situation is not discussed. This is particularly pertinent as the site is in direct hydrological connectivity via the Sarre Penn to the Stour.

TRAFFIC/POLLUTION

NPPF

2.15 More specifically on air quality, Paragraph 186 makes clear that: "Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean **Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.** So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan". THERE HAS BEEN **NO AIR QUALITY ASSESSMENT SINCE 2019! THEREFORE NO ACCOUNT TAKEN OF ALL NEW DEVELOPMENTS IN STURRY and BROAD OAK and OTHER AREAS AFFECTING STURRY (HERNE, HERSDEN, BROOMFIELD)**

AIR POLLUTION ref R9

120 houses -288 residents, 1.3-1.5 cars per house (ONS survey 2021), 7 vehicle movements per day

The main road connecting the proposed site for c110 homes to Canterbury is the A291 and the A28 which runs through the Sturry level crossing, which is known to be a source of engine idling and poor air quality, and then onto Military Road, an AQMA. In terms of road safety the A291 has one of the worst road traffic accident records in the country. Congestion is particularly bad on Sturry Hill, and Popes Lane is a rat run avoiding the crossing area, with particular problems at school times and rush hour, due to its narrow width past parked vehicles.

Assessment of walking times (in the Gladman application) from the proposed development to and from the rail station do not take into account the steep hill which must be walked along narrow pavements as times given are for the walk down the hill not coming up it, (a struggle for many and certainly significantly slower). The pavement is also very narrow for pushchairs or wheelchairs

The cumulative effects should also be considered here -1100 houses have already been given planning permission in the vicinity and changing the nature of the village.

NHS RESPONSE to LAND NORTH of POPES LANE APPLICATION

Justification for infrastructure development contributions request. This proposal will generate approximately **288 new patient registrations** in general practice based on the dwelling mix provided in Appendix 1.

The proposed development falls within the current practice boundaries of Sturry Surgery, Northgate Medical Practice, Canterbury Health Centre, New Dover Road, The Heron Medical Practice, Canterbury Medical Practice, University Medical Centre. The proposal will also increase demand on other healthcare services provided to the local population and will be considered as part of the integrated models of care that will be developed along with the infrastructure strategy for the East Kent Health and care partnership area. There is currently limited capacity within existing healthcare premises to accommodate growth in this area. The need from this development, along with other new developments, will therefore need to be met through the creation of additional capacity in general practice and other healthcare premises. Whilst it is not possible at this time to set out a specific premises project for this contribution we can confirm that based on the current coverage of health care services and location of this application, we would expect the contribution to be utilised as set out above.

it is extremely concerning that a number of districts smaller villages have seemingly been prompted to Local Service Centre status. On closer review, it appears that this has been on the basis that whereas the provision of a bus service was previously recorded, this time it has not. Consequently, a number of small villages promoted to Local Service Centre status do not even have a conveniently located regular bus service. This includes Broad Oak.

R10 PADDOCKS -OBJECT

CPRE Kent consider this site to be particularly constrained and therefore unlikely to be suitable for development. Specifically the south-eastern corner contains a section of Natural England Priority Habitat: Deciduous Woodland. Natural England Ancient Woodland abuts the site to the east. The entire site is covered by Canterbury AHLV. The site is Grade 2 and 3 Site contains a parcel of Priority Habitat and is within an orange area for Great Crested Newts.

R14 -OBJECT

This is yet another development at Broad Oak which has already taken a huge amount of housing. Unlike the main Broad Oak site already approved, which is between two already built up areas, by contrast site R14 extends destructively into open countryside and is not acceptable.

R16 LAND FRONTING MAYTON LANE BROAD OAK -OBJECT

Comments as above apply

RESERVOIR (R17) -OBJECT

There are significant concerns over the principle of siting a reservoir at this location. The preamble to R26 acknowledges that there is opportunity to deliver recreational benefits on top of the proposed functional water infrastructure provision, but the case still has to be made for any reservoir at all at Broad Oak – in which case the policy intention of delivering a recreational facility at the site becomes redundant.

While the policy refers to a long-overdue safe cycle route between Herne Bay and Canterbury, it carefully avoids making any clear commitment to its provision: Policy R26 must actively commit to the delivery of such a route should the reservoir go ahead.

Environmental concerns: the site safeguarded for the reservoir has developed into a particularly diverse local habitat. While we recognise and applaud the intended commitment to improving green infrastructure, delivering a genuine net gain in biodiversity will be an extraordinarily challenging task.

Infrastructure planning concerns: the reservoir is proposed in both the WRSE and South East Water plans, currently under consultation, to help meet the requirements for the projected household growth of the southeasternmost area of the region. **However, the projections of**

the numbers of households whose needs they are intending to meet are over-stated. Current targets for household growth are known to be flawed, the regional and individual water company projections of need are vastly in excess of the homes likely to be delivered.

Hydrological concerns: we were informed that the reservoir, situated in the Sarre Penn valley, will need to be supplemented by water pumped from the Stour. It is common local knowledge that the Sarre Penn stream frequently dries to a series of disconnected pools in summer, and that the winter flow of the Stour (to which the Sarre Penn is a tributary) is in long term decline, limiting the options for filling any reservoir at this spot. CCC could find itself left with the worst of all options: high housing targets based on the assurance of water supply from a reservoir that may never fully function, lacking the available water to fill it and failing to deliver the recreational and biodiversity gains that were promised.

COMMUNITY FACILITIES

Please see SABORA response re the severe lack of community facilities despite the overburdening of the area with developments, primarily due to the need to fund the budget busting, ineffective planned Sturry relief road.

LACK of PUBLIC OPEN SPACE -Sturry and Broad Oak are already severely deprived of sufficient public open space and the removal of greenfield sites, even if retaining footpaths, changes the nature of highly utilised footpath from their current, wellbeing inducing routes into poor corridors with limited views and alongside built-up areas. R9 proposes an emergency access route to the wastewater treatment plant alongside the current well-used footpath!

MONITORING –

Our local experience of developer adherence to compliance has been extremely poor. It seems to us that the power of developers over the right of residents to a reasonable standard of amenities (lights, pavements, safe crossings, mental health)has been prioritised . Numerous complaints to KCC and developers have been met with no response :

EXAMPLES:

Poor and unsafe repair of pavements after works

Water leaks (repeated)

Run-off from site onto woodland

NO street lights above the David Wilson site at Broad Oak and Broad Oak turning for 9 months creating a dark and dangerous route for pedestrians

Sturry and Broad Oak has not only had 1 100 houses approved already but is affected by the thousands of new houses in Herne, Hersden, Broomfield and Thanet as so much traffic from these passes through the area.

In return, Sturry and Broad Oak are gaining no increase in open space, community facilities or medical facilities. ENOUGH is ENOUGH!

