

## 1 1. Summary

### 2 1.1 Deliverability

This Local Plan (the Plan) is fundamentally flawed. It is based on misleading data and targets, resulting in the wrong type of housing being built in the wrong quantities in the wrong locations. These are the very points made by the Labour Councillors in their response to the previous consultation in 2022.

The Plan requires an increase in annual completions of homes from the current average of around 500 to 1149 – more than doubling the rate – without any explanation or consideration of how such a step change in construction rates is to be achieved.

As a result, it is almost certainly not deliverable. At the very least, deliverability – which is required to satisfy the Planning Inspector - has not been demonstrated or explained. Without such supporting data the Plan ought not to be put forward to Regulation 19 consultation.

The Council has failed to consider whether the target number of home completions should be amended in line with the December 2023 NPPF changes, and whether there are exceptional circumstances locally which might support amendments to the target number. That failure has been pointed out to officers repeatedly, and their rationale for it is so obviously flawed that the refusal to even countenance whether such circumstances may exist is on the cusp of maladministration.

The Transport Strategy on which the Plan relies to resolve issues around congestion and air quality has not been modelled nor has it been agreed with the responsible authority, Kent County Council. The funding basis of the Transport strategy is nowhere explained, and since the City Council is not responsible for buses, and as neither CIL nor s106 funds can be used for long term revenue funding of a bus service, there is no sound basis for the bus-led transport strategy.

### 1.2 Overall strategy

The Plan has not been risk assessed for:

- the significant possibility of homebuilding completions falling below 75% of the annual target over an extended period, which would create a presumption in favour of development under NPPF standard rules
- the concomitant risk of a shortfall in completions below the target, which would adversely affect the funding for the mitigations and gains proposed under the Plan.

Equally, there is no indication that the Council has made any assessment of what level of completions might be actually deliverable, and thus no consideration has been given to what mitigations and gains might actually be required or desirable. The Plan contains no indication of how or which mitigations would be prioritised overall or for specific developments.

The previous consultation draft ran to 2045 but included approximately the same quantum of annual homebuilding. That volume was necessary to provide, inter alia, £163 million of funding for a so-called Eastern movement corridor. The new Plan has no such major highways scheme yet seems to require the same amount of annual building. No explanation or justification of this has been provided.

There are significant problems with the proposed siting of major developments, in particular to the north of the University (policy C12) and around Sturry and east along the A28 corridor (policies R5, R6, R9, R10, R14, R15, R16 together with sites brought forward from the previous (2017) Local Plan). The Plan fails to consider these latter developments

as a strategic challenge which causes collective impacts on infrastructure, in particular roads, education and healthcare.

The allocation of sites has been wholly driven by developers and not by any genuine strategic consideration. That, in turn, is almost certain to create greater traffic problems, worse environmental impacts and a greater threat to the World Heritage Site (WHS) status of the City than any other option.

### 1.3 Precise Language

The document will be used as the basis for decisions by the Council, and specifically the Planning Committee. It is essential therefore that its language should be precise and clear, and legally meaningful and enforceable. Regrettably, the terminology used often falls short of these standards. There is therefore a serious concern that the resulting imprecision may mean that the Local Plan could be unenforceable, open to dispute and difficult for the Council to use.

For example, the following issues recur throughout the various policies:

- “Should” is used consistently when policies ought to say either “must” or “may”, depending on whether the Council considers the issue to be optional or not. If “should” means “must” then this ought to be made explicit at the start of the document.
- “High quality” is used repeatedly, and in different contexts, without any definition of what it means. Quality in this context is entirely subjective and effectively meaningless for decision making purposes.
- “Will be supported” is repeatedly used, when it would be better to say “will be considered”, since the former indicates a predetermined position rather than giving the planning officers and committee an opportunity to review a proposal
- There are several statements about applying “Garden City” principles but nowhere are these explained.
- There are a number of other highly subjective phrases used throughout the document, including: “vitality”, “viability”, “feasible”, “well designed”, “attractive”, “truly outstanding” and “closely aligned”. Again, these terms need either to be replaced with more clear phrases, or to be defined.

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## 4 2. Detailed response

### 5 2.1 Undeliverable Building Targets

The Plan proposes 22,980 homes to be built over a 20 year period to 2040. That target is unachievable on current building rates, which are roughly 50% of that number.

The Plan does include existing commitments to developments from the 2017 Local Plan and before, such as Mountfield Park/South Canterbury. Nonetheless the aggregate proposed construction rate is 1149<sup>1</sup> per annum.

Building rates have been relatively consistent over the 10 years to 2021, even through Covid<sup>2</sup>:

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<sup>1</sup>Draft Local Plan page 17: Policy SS3, section 1 (a)

<sup>2</sup>Housing Information Audit, Kent Analytics, Kent County Council:

[https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0003/58287/Kent-local-authorities-dwelling-completions.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0003/58287/Kent-local-authorities-dwelling-completions.pdf)

- an annual average of just 430 completions, after adjustments for demolitions and repurposing of properties.
- excluding the Covid period 2020-21, the mean completions remain at 441 per year over the period from 2011/12.
- note that these figures pre-date the Stodmarsh water quality problems which have impacted the granting of new planning consents.
- completions for the years 2021/22 and 2022/23 are higher at 692 and 644 respectively<sup>3</sup>
- even from that base a 67% increase would be required to achieve the target set in the new Local Plan.

The Plan does not provide any indication of how a step change from this base to 1149 completions per year is to be achieved. There is no indication as to why developers would suddenly increase the build rate when the housing market is sluggish and they work on a “flow” sales/construction business model, in which houses are in effect built to order. The Council has no powers to deliver such a change.

Existing sites with planning permission from the previous Local Plan have not had significant rates of completion. Apart from Mountfield/South Canterbury, where not a single dwelling has yet been built, the seven major sites have constructed just 1299 homes from a total of 3328 – that is, just 39% of the permissions granted. (see Appendix A)

## 6 2.2 Exceptionally Low Population Growth

Population growth has been consistently and grossly over estimated. It is evident that not only was the 2014 initial population estimate from ONS wrong, but that all subsequent growth figures are also wrong. While it is understood that the Government methodology does not countenance inserting reality into these figures, it remains the case that the resulting LHN is still only a starting point for the Council in developing the Plan.

There is plentiful and compelling evidence that the local facts show a clear deviation from the standard calculations of growth and are therefore exceptional, and should have been considered by the Council when reviewing the LHN.

CCC commissioned a report on population growth estimates<sup>4</sup> as the basis for a standard Local Housing Need (LHN) calculation. The result is an estimated Housing Need of 1120 per annum. There is no basis for increasing this to 1149.

The Council’s local Plan (LP) evidence library also includes the Housing Needs Assessment (HNA) from September 2021<sup>5</sup>.

The proposed housebuilding target of 1149 suggests an annual population growth figure, at the standard of 2.4 residents per dwelling, of 2,757. That quantity of growth has only been achieved once in the past 20 years according to the Office for National Statistics (ONS)<sup>6</sup>.

<sup>3</sup>Library of the House of Commons: <https://commonslibrary.parliament.uk/local-authority-data-housing-supply/>

<sup>4</sup>Edge Analytics / Domus report:

<https://www.local.gov.uk/sites/default/files/documents/Housing%20Needs%20Assessment%20%28September%202021%29%20%281%29%20%281%29.pdf>

<sup>5</sup>Varbes, citing ONS data: <https://www.varbes.com/population/canterbury-population>

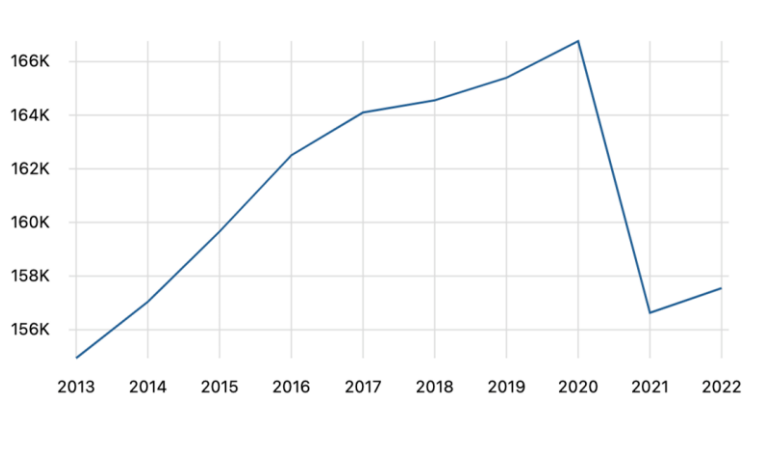
<sup>6</sup>Office for National Statistics

The target is based, according to the Government’s standard methodology, on population growth estimates from 2014, which estimated the population at that date to be 157,044. Edge Analytics report (ibid) claims the populations of Canterbury in 2018 was 165,400. It says that the

*“latest population projection from the Office for National Statistics (ONS), the 2018-based projection (ONS-18), estimates an 8% increase in Canterbury’s population to 2040. This is **lower** than the earlier 2014-based population projection (ONS-14), which projects a 15% increase.”*<sup>7</sup> (their emphasis).

In fact, the 2021 census data<sup>8</sup> released after the Edge Analytics report was written, shows the population to be just 156,631. That is LOWER than the 2014 base (see Figure Four). Even if the 2014 base figure is correct, the actual population growth from 2013 to 2021 averaged just 290 people per year.

Nonetheless, population growth estimates underpinning the requirements for the Local Plan to 2040 continue to be based on the 2014 figure<sup>9</sup>.



**The effect of the drop in population shown by the 2021 census is not confined to illustrating the errors in the 2014 base and growth estimates up to 2021.**

As Table Five shows, the LHN growth estimates to 2040<sup>10</sup> are still based on the 2014 figure – as stipulated by the standard Government methodology – but because there is no means to adjust them for the 2021 census they continue to amplify the flaws evident in the 2014 base. But if the City Council were to apply the 2021 census as the starting point for the 2040 forecast, with the same growth percentages as the LHN, the results are as shown in the fourth column of Table Five<sup>11</sup>.

That is around 8,000 below the LHN estimate. At the “residents per dwelling” ratio of 2.4/1 that suggests a total homebuilding target 3,333 lower than the current LP target, which is a mean of 222 per year less, giving a net building target of 927. That’s still well in excess of actual historic building delivery, but crucially within the range needed to stave off presumption in favour of development (see below). This demonstrates an “exceptional

<sup>7</sup>Edge Analytics / Domus report p ii, sE4

<sup>8</sup>Office for National Statistics

<sup>9</sup>Varbes / ONS

<sup>10</sup>ONS / Varbes

<sup>11</sup> This assumes the average growth continues between 2022-2024, for which estimates are not available

circumstance” which ought to be used when adjusting the LHN to reflect actual local housing need.

**Table Five:** adjusted Population growth forecasts

Year	Growth	LHN Estimate Population	Revised Estimate from 2021
2021	-6.08%	156,631	
2022	0.59%	157,550	157,550
2023	1.06%	N/A	159,216
2024	1.06%	N/A	160,903
2025	8.00%	170,151	162,609
2026	0.61%	171,184	163,596
2027	0.62%	172,249	164,614
2028	0.55%	173,191	165,514
2029	0.51%	174,069	166,353
2030	0.48%	174,906	167,153
2031	0.47%	175,725	167,936
2032	0.37%	176,369	168,551
2033	0.27%	176,849	169,010
2034	0.24%	177,273	169,415
2035	0.26%	177,734	169,856
2036	0.23%	178,138	170,242
2037	0.17%	178,434	170,525
2038	0.10%	178,609	170,692
2039	0.12%	178,831	170,904
2040	0.16%	179,122	171,182

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## 8 2.2 Excessive Scale of Development

The result of this over-provision for housebuilding is that the Local Plan proposes too many sites for development.

As a result the Plan includes sites scattered around the District with no obvious sense of priority or importance to the overall aims of the Plan. Too often, the detailed site policies make no reference to the stated objectives of the Plan itself.

Approving fewer sites would also minimise the infrastructure requirements in total, and thus speed up planning approval and construction.

There therefore needs to be a revision of the sites proposed to match the actual ability to deliver development at an appropriate scale. Sites which are excluded at this stage could still be reviewed when the next iteration of the Plan takes place in around 5 years’ times.

Without arguing the case for one site over another, it seems clear that a genuinely “strategic” Local Plan would, when prioritising sites offered for development through the

'call for sites" phase of the process, consider a range of issues. These should include, as a minimum:

- impact on traffic movements
- environmental impacts
- demands placed on education and health services
- water supply and sewage treatment requirements
- ability to provide adequate open space of various types within the site
- impacts on World Heritage sites, SSSIs, AONBs, locally designated areas (e.g Country Parks)
- associated benefits delivered to existing residential areas
- employment impacts

Such considerations ought to be transparent and the basis for decisions should be publicly available.

### 9 2.3 Exceptional Local Circumstances

The Council has failed to consider whether local circumstances require changes to the formally calculated LHN assessment.

The revised NPPF clearly and repeatedly states that the LHN and HNA are "starting points" for calculating required homebuilding, which can be amended by showing, among other things, that "exceptional circumstances" apply to a district.

The Council has refused to adequately explain why it has not considered, let alone argued, that "exceptional circumstances" might be justified to adjust the homebuilding target, specifically to reduce it. The sole justification given, interpreting the footnote to the NPPF s60 as definitive, is risible.

Councillors seem to firmly believe that the target is mandatory and will not listen to evidence that says it is not.

Edge Analytics report<sup>12</sup> quotes s60 of the previous version of the NPPF. Despite clearly setting out the mandatory need to use the 2014 base population figure, this says:

*"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – **unless exceptional circumstances justify an alternative approach** which also reflects **current and future demographic trends and market signals.**"* (My emphasis).

The NPPF update of December 2023 adds significantly more discretion to this by replacing the text after "national planning guidance" with

*"The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area... There may be exceptional circumstances, including relating to the particular demographic characteristics of an area".*

There is then a new explanatory footnote which states:

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<sup>12</sup>Edge Analytics *ibid*, p1 s13



*“Such particular demographic characteristics **could, for example,** include areas that are islands with no land bridge that have a significant proportion of elderly residents” (again, my emphasis).*

This is obviously no more than an illustrative example, not a definitive (restrictive) statement, because it uses the conditional form and specifically states it is “for example”. That couldn’t be clearer. In fact, the example is both specific and unique and therefore cannot be the defining condition for exception. It is, rather, illustrative of a general rule and is not intended to be definitive, as evidenced by the Research Briefing on the NPPF in the House of Commons Library<sup>13</sup>:

### **9.1.1 “Is the figure a binding housing target or requirement?”**

*The figure produced by the standard method is intended to be a starting point to determine the number of homes an LPA should plan for; it is not a binding target or a requirement. LPAs can weigh the figure against local constraints (such as green belt land).*

*The government updated the NPPF in December 2023 to state that the standard method provides “an advisory starting-point”, not a target.”*

Nonetheless, the previous NPPF also gave limited discretion to argue for exceptional circumstances.

To support that change to the NPPF, a housing debate<sup>14</sup> in Parliament was held on January 23<sup>rd</sup>. In that, the Minister for Housing, Planning and Building Safety, Lee Rowley, repeatedly stated that *“we have been consistently clear that **the standard method is a starting point** for local authorities in assessing what to plan for and that **it does not set a mandatory target**. ... Again, for the avoidance of doubt, that means that local authorities can put forward their own approach to assessing needs where certain exceptional circumstances exist.”* (again, my emphasis).

Factors which might, individually or collectively, support the case for applying “exceptional circumstances” to the homebuilding targets for Canterbury District include:

- demographic factors: evidenced by the 2021 census, the population of the District has not grown as the 2014 baseline and growth estimates underpinning the LHN assessment suggested it would, and such growth as there has been has been minor (discussed above)
- regardless of that, the current evidence of annual population growth (rather than the total estimate) suggests that the 1149 new homes target is broadly double what the demographic trends justify
- the rate of housebuilding of the past 10 years, which has been entirely determined by the market, suggests that developers also do not believe there is the demand for the volume of new homes building which the LHN calculations propose
- the status of the City’s World Heritage site (WHS), a status which must be protected so as to sustain the tourism elements of the local economy

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<sup>13</sup>Research Briefing, House of Commons: <https://commonslibrary.parliament.uk/research-briefings/cbp-9268/>

<sup>14</sup>Hansard: <https://hansard.parliament.uk/commons/2024-01-23/debates/AD440671-52A7-4FD0-9F85-3C40B88BF776/RevisedNationalPlanningFramework>

- local geographic features include significant Areas of Outstanding Natural Beauty, SSSI's, local landscape designations, and important agricultural land, which taken together and separately severely constrain sites suitable for development. As a result, the proposed 5 year housing supply contains several locations which are sub-optimal in various ways.
- Canterbury district also currently has:
  - inadequate road networks, especially around the WHS, the A257 and A28 routes running through the City, and the arterial coast road the A2990, which are in effect impossible to expand;
  - inadequate NHS provision at both primary care and hospital levels
  - wholly inadequate water supply and sewage treatment provision. The latter threatens to damage the coast (and again would have the knock-on effect of damaging the tourism economy), the “irreplaceable” chalk rivers, the SSSIs, and the local economy, as well as rendering some smaller development sites unsuitable because they are unable to effectively treat site-generated effluent.

While it's understandable that the current draft was already so far developed when the new NPPF was issued that undoing the work at that point was not viable, the failure to consider or actively seek views on grounds for amending the LHN assessment is of concern, and the repeated denial that the option to adjust the figures exists indicates a pre-judgement of the consultation.

### 103. Effects:

#### 3.1 Overall viability

Funding for associated strategies and policies from developments may not be adequate if there is a shortfall in building below the target numbers.

Although this is nowhere stated, homebuilding numbers in the LP are required to fund the changes in related plans, including the Transport Strategy and the Air Quality Strategy. That is a significant omission which again undermines the value of the consultation process.

The Transport Strategy in particular is likely to be expensive both to set up and to operate, and the related evidence papers provide only high level ranges of costing and no specific indication of funding sources, especially for revenue subsidy in the long term.

The Plan seems to have merely replaced one unaffordable option, the Eastern Movement Corridor, with another – the “bus first” transport strategy.

In both cases it may be argued that the transport solution is driving the housebuilding targets rather than the other way round. That is neither sensible nor deliverable.

#### 3.2 Reductions to s106 Benefits

The new draft reduces many of the community benefits proposed by the previous (2022) draft.

In part, this is because the Plan period has also been reduced, and thus the total number of dwellings has been reduced.



In total, the previous plan to 2045 proposed 31,300 new homes, and the new draft to 2040 proposes 22,980, a reduction of 27%, in line with the 25% reduction in the period covered. Policy SS1 sets out the new proposed allocations for public spaces. These cut the allocation of land for amenity spaces by a minimum of 30%:

- reduced natural and semi natural open space from 105.93 ha to 75ha (30% reduction)
- reduced amenity open space from 69ha to 46ha (33%)
- reduced parks and gardens from 21.5 ha to 15 ha (30%)
- reduced play facilities from 14.79 ha to 10 ha (32%)
- reduced allotments from 393 to 279 (30%)
- reduced sports space from 22.8ha to 16ha (30%)
- cut Womenswold Country Park (50ha) entirely

In addition:

- Policy SS5 cuts the number of primary schools from 6 to 4 (again, more than 33%)
- Policy W4 reduces a 3 form entry primary school to 2 form entry (33% cut)
- Policy W4 reduces the land allocated for the SEND secondary school by 32%

This consistent pattern of reducing amenities by more than the reduction in housing numbers is not explained anywhere in the Plan. In the case of schools provision, for example, it may be that these cuts are not reversible, in that they cannot be added back without significant additional future expenditure or will be inhibited by an absence of land.

### **3.2 “Presumption” is a significant risk**

One concern that flows from the wide variance between historic home construction completions and the new target is the risk that developers will not build the numbers required, for example because they want to sustain high house prices (which would be undermined by excess building), or because they simply can't obtain the skilled labour needed, or because there isn't the demand in the first place.

If homebuilding delivery falls below 75% percentage of the target of 1,149 per year, the Government may step in to suspend the LP and replace all of it with the basic NPPF standards through a presumption in favour of development. That would mean that applications for housebuilding, regardless of location, have to be approved by the Council unless they can be shown to be “unsustainable” under the NPPF, which does not recognise any of the local issues that affect Canterbury district. The Council has only just emerged from such a position, following Covid and the constraints on building created by the Stour/Stodmarsh nutrient pollution problems.

To avoid presumption, the Plan will have to deliver 862 (approx) new homes on average every year. That is double the average achieved over the past 10 years (discussed previously). Since the Council cannot control the rate at which commercial developers build or indeed sell homes, the only mechanism that would seem likely to deliver the additional homes would be for the Council to build them, which it cannot financially afford, and has not said it intends to do. If the target figure was 927 (as calculated above) then

“presumption” would only be triggered if the homebuilding achieved fell below 695 per annum – much closer to the number actually delivered recently.

### 3.3 Funding for ongoing activity

The Plan nowhere addresses how future operational (revenue) expenditure is to be provided for some of the strategies.

There are many admirable aims within the Local Plan, especially around transport, air quality and the environment. Many of these have one off (capital) costs and require little or no further activity to deliver the benefits.

In the cases of, for example, schools and medical facilities, funding is generally sourced (de facto) from Government, according to the numbers of service users. But in the case of the transport policy in particular this is not the case.

Bus services require subsidies. The Plan does not address at all how this is to be achieved.

It is unclear what the sources of revenue and capital are to be. KCC is the relevant authority for this and it is not evident from the consultation documents that they have yet validated the City Council’s proposals. There is a risk that KCC may not provide funding or not guarantee it for the long term needed to deliver the beneficial effects of the strategy.

## 4. Supported policies

The following policies are positive improvements which, if achieved, will enhance the lives of residents:

WPC supports the Vision and Strategic Objectives for the District

WPC supports the following policy statements:

SS1 - Environmental Strategy

SS2 - Sustainable design

C20 - Land south of Sturry Road

R17 – Broad Oak Reservoir

R19 – Countryside

DS4 – Rural housing

DS5 – Specialist housing provision

DS6 – Sustainable design

DS7 – Infrastructure delivery

DS9 – Education and associated development

DS11 – Tourism (in particular s. 2)

DS12 – Rural economy (in particular s. 3)

DS15 – Highways and parking

DS16 – Air quality

DS17 - Habitats of international importance

DS18 – Habitats and landscape of national importance

DS20 – Flood risk and sustainable drainage

DS21 – Supporting biodiversity recovery

DS22 – Landscape character

DS23 – The Blean Woodland Complex  
DS24 – Publicly accessible open space and sports  
DS26 - Historic environment and archaeology  
DM1 – conversion of existing rural buildings  
DM4 – Reducing waste  
DM5 – Parking design  
DM6 – Extensions and alterations  
DM7 – Health and crime impact assessments  
DM8 – Shopfronts  
DM9 – Advertisement  
DM11 – Residential design  
DM14 – Flood risk  
DM15 – Sustainable drainage  
DM16 – Water pollution  
DM17 – Noise, odour and dust pollution  
DM18 – Light pollution and dark skies

The following policies are positive but I do not believe they are deliverable, since there is no information on costing or funding for them, as discussed above:

SS4 - Movement and transportation  
SS5 – Infrastructure  
DS13 – Movement hierarchy  
DS14 – Active and sustainable travel

## 4. Comments on other policies

### 4.1 Need amendment

SS3 Development Strategy:

1. the proposed provision for housing is excessive and undeliverable, as set out previously
2. the strategy says that the focus for development will be Canterbury Urban area, with a second focus around Whitstable and Herne Bay urban areas. In fact there are substantial developments outside these urban boundaries, especially north of the University of Kent (although the Plan wrongly describes it as being within Canterbury urban area, it is not) and around Sturry, Hersden, Broad Oak and Westbere which total 2628 additional dwellings.
5. there is no explanation of how, in designated “Local Service Centres” the “existing community facilities and services will be protected and enhanced”. Without that detail the statement is meaningless.

DS1 – Affordable housing: this provision fails to adequately address the urgent need for social housing in the District.

DS25 – Renewable energy and carbon sequestration – it would be a major improvement if all new developments were required to include rooftop solar PV power generation as a matter of course, rather than being merely “encouraged”

C4 and C21 – these are vague and far too weak for such critical locations near or within the historic City centre and risk damage to the World Heritage Site status

DS3 – this policy as drafted and taking into account other policies will have the effect of causing a reduction in the quantum of social housing and its replacement with “affordable” housing which is de facto at a higher cost

DS10 – Town centre and community facilities: in this list, Hersden and Westbere are both noted as “village centres”. This seems to contradict policy SS3 (5)

## 4.2 Around Westbere

As set out in the section on Habitats, landscape and sites of local importance, paragraph 6.58 refers to green gaps between rural communities as shown on “the policies map”. It is unclear what the “policies map” is. This shows three “green gaps” around Westbere, described as:

- Between Sturry and Westbere
- Between Sturry and Hersden
- Between Westbere and Hersden

This latter is actually within the Parish boundary of Westbere. The land between Westbere and Hersden is actually the Bread and Cheese Field (policy R5, see below), and any genuine review of the Plan would support the idea that this ought to form the Green Gap.

The land to the north of Westbere Lane, to the east of the convent along the A28, should be a designated Green Gap as there is already housing in Sturry opposite this area.

## 5. Opposed

C18 – Land east of Shelford Landfill – this development places excess pressure of heavy goods vehicle traffic on to Broad Oak Road and the surrounding streets and access routes with no indication of an upgrade to either the road system or the rail crossing nearby. This is potentially dangerous, and the roads are already in a seriously degraded condition due to traffic to the landfill site.

R1 – Rural service centres, in as much as it treats Hersden as a rural centre when it is not. Hersden ought to be designated as a Local Service Centre as it has just one shop, one community centre and one church. As a result the proposed allocation of land for housing development will stress the amenities of Hersden which cannot support such large scale developments. Westbere, which has no shops and may be about to lose its only pub, should be designated as a hamlet.

R5 – Bread and Cheese Field: 150 dwellings. As noted above, this field ought to form the Green Gap between Westbere and Hersden. The plan treats this area as if it were exclusively within Hersden whereas in fact it is the geographic border between Westbere and Hersden, and its allocation within the Parish of Hersden is currently the subject of a Community Governance Review.

R6- Land at Hersden: 18 dwellings which will add yet another point of access to the A28 in less than 400 metres..

R9 – Land at Popes Lane: 110 dwellings which will overload adjoining roads and junctions, especially those at Hawe Lane / Babs Oak Hill, the junctions at Fox Lane, Sweechgate and Herne Bay Road, and at Popes Lane / Herne Bay Road. With development currently under construction on Herne Bay Road the likely impacts are significant. Popes Lane is already too narrow for traffic flows at peak times, and Hawe Lane is rapidly deteriorating to the state of a cart track.

R10 – Land at the Paddocks 50 dwellings: This will add more traffic onto Broad Oak Road and Sweechgate and the associated junctions which are already overloaded.

R14, R15, R16 (all Broad Oak) 46 dwellings and significant commercial / business space. As for R10 above.

Taken together with the carried forward policies from 2017, allocations for development in the Hersden / Westbere / Broad oak and Sturry area total 2628 new dwellings. This is a significant collective impact on the area and in particular on the transport network. Rather than sites around these villages being considered piecemeal, for the purpose of amenities and transport they should be considered as a whole with an overriding masterplan and enhancements to roads, cycling and walking routes, as well as enhancements to bus services, which address the total impact. The proposed (so called) Sturry Relief Road (policy CF8) does nothing to address this impact, and is merely a sticking plaster solution to existing traffic congestion caused by the Sturry railway crossing. It is vital that the Plan should ensure that the collective impact on infrastructure is considered and that opportunities to enhance (for example) walking and cycling routes across the area are maximised and delivered. This has not been one in this area.

R11 s1(c) The blanket proposal to allow infilling in Local service centres (villages) is utterly misguided, as well as being unnecessary it has the potential to significantly change the character and nature of these settlements. Such development can only be to the detriment of village character and will place additional burden on amenities, including roads and other public services without providing any enhancements.

DS19 - Habitats, landscape and sites of local importance. This section is weak and offers scope for development in important and sensitive habitat areas. This should not be permitted under any circumstances.

DM2 – Residential garden land: this is essentially a green light for infilling gardens, with a significantly detrimental loss of green space and habitat .

DM13 – Biomass technology: This is not consistent with the carbon neutrality proposed elsewhere in the plan, and there should be a compulsory installation of air source or ground source heating with PV power generation if required.

**Dave Wilson**

May 2024

## Appendix A:

Major sites construction completions 2017 – 2023

(source: Canterbury City Council Planning team, April 2024)

Entire site	Net on planning application(s)	Completions					
		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Site 2: Broad Oak (Northern)	455					-1	31
Site 4 Land at Herne Bay Golf Course, Herne Bay	673	92	73	104	73	114	115
Site 7 Land North of Thanet Way	400					18	56
Site 9 Land at Howe Barracks, Canterbury	500		13	85	47	61	106
Site 11 A Land at Cockerling Farm, Thanington	750			19	17	71	41
Site 12: Grasmere	300						4
Hoplands	250			21	14	69	56
	3328	92	86	229	151	332	409
						<b>Total</b>	<b>1299</b>
						<b>%</b>	<b>39.03%</b>