

Planning Policy Department
Canterbury City Council
Council Offices
Military Road
Canterbury
CT1 1YW

Our ref: AL/17/04451

Date: 31st May 2024

Dear Sirs,

RE: REPRESENTATIONS FOR THE DRAFT CANTERBURY DISTRICT LOCAL PLAN TO 2040 CONSULTATION – LAND ADJACENT TO MILBOROUGHS - RESIDENTIAL ALLOCATION UNDER DRAFT POLICY R9 (LAND TO THE NORTH OF POPES LANE).

We act on behalf of Mr Paul Crayford and Mrs Angela Crayford, and write in respect on the above consultation. The site is currently undeveloped land located adjacent to the settlement of Broad Oak and near to the larger village of Sturry.

Canterbury City Council have allocated residential development land under draft Policy R9 (Land to the North of Popes Lane), which is adjacent to our client's site. However, to unlock this future residential development site, the transport considerations that were raised by the Inspector in the dismissed appeal ref: APP/J2210/W/18/3216104 will need to be addressed. Following the dismissed appeal, Gladmans Development Ltd submitted an outline planning application ref: CA/23/01743 for an outline application for up to 120 residential dwellings with all matters reserved except for access. This application is currently under determination; however Kent County Council (KCC) Highways department have raised a number of fundamental highways concerns relating to the junction data/modelling within the submitted Transport Statement. From discussions with KCC Highways we understand that they are in discussions directly with Gladmans Development Ltd to address the highways concerns. However, on review of the Council's planning register there is no formal response published from Gladmans Developments Ltd to directly address KCC Highways comments.

We maintain the position highlighted in previous local plan representation submissions, that widening the residential allocation to incorporate our client's site, will address the transport matters, unlock the Draft Policy R18 site for residential development and provide an opportunity for additional housing on our client site. This approach will maximise the residential quantum, further contributing to meeting Canterbury City Council's housing need targets. The Green Gap will also still be retained. Therefore, the revision we propose within these representations to draft Policy R18 should be reflected across future policies prepared by the Local Authority.

SITE AND SURROUNDINGS

The site is currently undeveloped and measures 1 ha and is located adjacent/near to the villages of Broad Oak and Sturry, the latter being a settlement where development is driven under the rural settlement hierarchy.

To the north of the site is Milborough House, beyond which are three Grade II listed structures (Sweech Farmhouse and the associated barn and stable). To the east is a field in agricultural use, which has recently been subject to a refused planning appeal. To the south is a strip of undeveloped land, beyond which is the development boundary of Sturry and residential development. To the west – on the other side of Herne Bay Road, is a strategic allocation (Broad Oak Farm) for 1,000 dwellings (alongside business, retail, and community development). The settlement of Broad Oak begins to the north west of the site, on the other side of Herne Bay Road. This includes some housing in the Green Gap near Herne Bay Road frontage.

The site is currently located outside the settlement boundary and within the Green Gap however, as discussed in more detail below, is in an area that is undergoing substantial redevelopment. Additionally, the site is located within the 7.2km area of the Thanet Coast and Sandwich Bay Special Area of Conservation (SAC). It is understood there are no other planning constraints which would prevent development from coming forward.

PLANNING HISTORY

A review of the Council's planning database suggests that there is no relevant planning history on the site. There is, however, relevant planning history on nearby sites:

- **Popes Lane (CA/23/01743)** – Outline application for up to 120 residential dwellings with all matters reserved except for access. – Currently under determination
- **Popes Lane (APP/J2210/W/18/3216104)** - The development proposed the erection of up to 140 Dwellings – appeal dismissed September 2019. The Inspector found that the Council were unable to demonstrate a five-year supply of deliverable sites. However, the sole reason for the appeal being dismissed appears to have been the anticipated impact on transport, which the Inspector regarded as significant and unacceptable.
- **Broad Oak (18/00868)** - The site is allocated within the Local Plan for 1,000 dwellings – with a live application to provide a total of 912 units along with retail and employment use.

LOCAL PLAN CONSULTATION HISTORY

The site was put forward as part of the Regulation 18 draft Canterbury District Local Plan in 2022 (**See Appendix 1**) Following the Regulation 18 submission, Canterbury City Council Policy Officers requested that the applicant sought pre-application advice with Kent County Council (KCC) Highways department (**See Appendix 2**). The applicant undertook the pre-application advice with KCC Highways. KCC were in support of the overall development and identified that the additional spur from the roundabout creating an additional access to draft allocated site R18 will be beneficial. KCC highlighted that further details to address development management matters will need to be provided in a future planning application submission. (**See Appendix 3**)

Our client's site was previously put forward to the Canterbury City Council Call for Sites consultation under ref: SLAA091 (**See Appendix 4**), which closed in June 2020. The call for sites submission promoted the site for residential development to contribute to the Councils housing need. Development on this site was envisaged to accommodate circa 40 units – of which affordable housing would be provided in accordance with policy, subject to viability and further detailed design work being undertaken. The Council reviewed the site and concluded that the site was technically suitable but conflicts with existing policy.

The site allocated under draft Policy R18 was promoted through the same Call for Sites consultation under ref: SLAA126 (Commercial) and SLAA011 (Housing). Site SLAA011 is now allocated under draft Policy R18 for potential housing development. The Council identified that site ref: SLAA011 to be suitable, available, and achievable. However, the reason raised by the Inspector in the dismissed appeal related to the anticipated impact on transport, which will still need to be addressed to unlock (make it achievable) this site for future housing development.

HOUSING REQUIREMENT & DELIVERY

The Council adopted Local Plan (2017) set a requirement of 16,000 units over the period 2011 to 2031. This is stepped as follows:

- 2011/12 to 2015/16 500 dwellings per annum (dpa);
- 2016/17 to 2030/31 900 dpa.

The Draft Local Plan evidence document, Canterbury City Council Housing Needs Assessment (Sept 2021) Outcomes and Methodology sets a requirement of 1,120 units per year over the Plan period (2020 -2040).

The below extracts of the Authority Monitoring Report 2021-2022 and Appendix F: Housing Land Supply Statement identifies the latest housing land supply trajectory and housing completions.

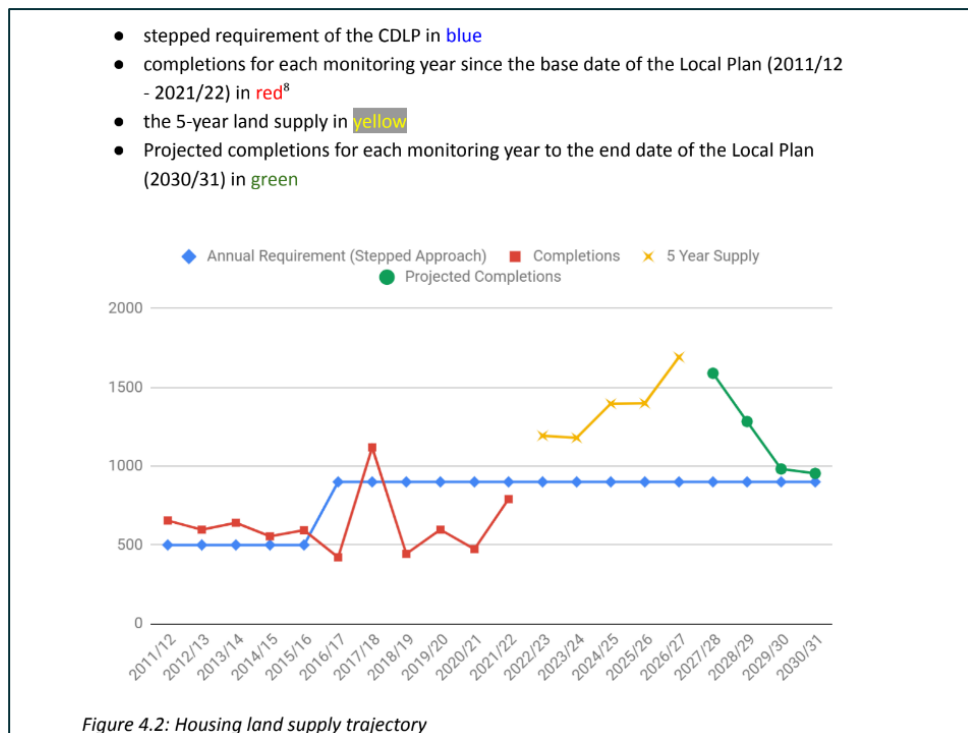


Figure 4.2 and Table B.1 identify that the Council have previously delivered above 500 units total completions in 2011/12 (655 units), 2012/13 (597 units), 2013/14 (641 units), 2014/15 (555 units) and 2015/16 (594 units), which is consistent with the stepped annual requirement established by the CDLP 2011.

In line with the stepped requirement from 2016 - 2031 the housing land supply trajectory increases to 900 dpa. Year 2016/17 the Council completion rates was 422 units which is 478 units below the annual requirement. In 2017/18 the Council reported completion of 1,119 units which is the first year in which the housing requirement has been above the 900 dpa target. In years 2018/19 (444 units), 2019/20 (597 units), 2020/21 (474 units) and 2021/22 (791 units), demonstrates that the Council have delivered well below the target of 900 dpa.

HOUSING SUPPLY

The housing trajectory has been changed from the projections that were published in the Local Plan. The monitoring report published in April 2021 to March 2022 suggests that the bulk of the housing will be delivered later in the Plan period peaking in 2027/28 (1,361 units). However, based on previous completion rates being below the stepped annual requirement of 900dpa, it is considered unrealistic that such a completion rate will be achieved.

The bulk of the housing is to be delivered through 12 strategic sites which were allocated in the 2006 Local Plan, and which have been carried through in the 2017 Plan. These sites will collectively provide around 16,000 units. In the 2017 Local Plan, delivery of these sites was expected to have started on all of them by 2018/19. The 2021/22 monitoring report outlines work has started on site at eight of the strategic sites, with four granted outline permissions. Based on these findings, the housing market appears to be significantly pressurised within the Local Authority area, with a history of sustained under-provision.

DRAFT CANTEBURY DISTRICT LOCAL PLAN TO 2040 SITE ALLOCATION

The previous draft allocation R18 has been amended to Policy R9 (Land north of Popes Lane) within the Draft Canterbury District Local Plan to 2040 and still includes our client's site though wholly designated within the Green Gap element of this allocation.

This Policy has not provided a concept masterplan as previous iterations of the draft local plan. We would request that a concept masterplan is produced to accompany draft Policy R9. However, the policy does allocate the site for residential development and also introduces additional land uses and contributions, which are identified in the following development criteria:

1. Development mix

- a) *Approximately 110 new dwellings including affordable housing, accessible housing and an appropriate housing mix in line with Policy DS1 and DS2.*
- b) *Proportionate land and build contributions towards and early years primary, secondary and SEND education plus proportionate contributions for primary health care and other necessary off-site community infrastructure.*
- c) *Open space: new on-site space will be provided in line with Policy DS24.*

2. Design and layout

- a. *Provide a high-quality built environment, in line with Policy DS6, with an average net density of around 35 dph.*
- b. *Provide development focused in the southern section of the site, which relates to the existing pattern, scale, character and frontages of development in the area.*
- c. *Ensure the development does not contribute to coalescence of the settlements of Sturry and Broad Oak by providing open space on the area covered by the gas pressure pipeline buffer zone.*
- d. *Assess areas of Archaeological Potential and protect and enhance nearby assets including the Grade 2 Listed Stabel Block at Sweech Farm, Sweech Farmhouse, and the Barn at Sweech Farmhouse.*

3. Landscape and green infrastructure

The green and blue infrastructure strategy for the site should:

- a. *Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate.*
- b. *Provide 20% biodiversity net gain, in line with Policy DS21.*

- c. *Incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area F3: Hersden Ridge set out in Canterbury Landscape Character and Biodiversity Appraisal.*
- d. *Preserve and enhance any long-distance views towards the surrounding countryside from open space and PRowS crossing the site.*
- e. *Provide habitat, pollinator and ecological connectivity across the site and with the surrounding landscape, including with priority habitats.*
- f. *Provide a landscape buffer in the form of natural and semi natural open space to the north and east of the site adjacent to the countryside containing ancient woodland and local Wildlife Site.*

4. Access and transportation

The access and transport strategy for the site should:

- a. *Provide safe and convenient pedestrian and cycle connectivity including:*
 - (i) New and improved walking and cycling connections to local amenities and services.*
 - (ii) New and improved walking and cycling connections to Hersden and Canterbury; and*
 - (iii) Improvements to the PRow network crossing and around the site as required.*
- b. *Provide a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation, and measures to minimise the need for use of private cars.*
- c. *Provide proportionate contributions to highway improvements to enable delivery of the Sturry Relief Road.*

5. Phasing and delivery

- a. *The Sturry Relief Road must be fully operational prior to the occupation of any dwellings on the site.*

The residential allocation within draft Policy R9 is welcomed, however it is our view that the concept masterplan should be revised to ensure that the sites residential development potential is maximised for a sustainable development through allocating a proportion of housing on our client's land. The current proposed access along Popes Lane is inadequate and unsafe.

PROPOSED DEVELOPMENT MASTERPLAN REVISIONS

These representations seek amendments to the development masterplan under draft Policy R9 to incorporate our client's site. The revisions to the masterplan are as follows:

Transport & Highways

- New link access from the Broad Oak development proposed roundabout.

Housing Land

- Allocation of housing development land to the south of Milborough House.

Environmental

- Alteration and revision of the designated Green Gap.

PROPOSED REVISION TO MASTERPLAN ASSESSED AGAINST DRAFT POLICY R9

This approach is further examined in the following section and assesses how the revised masterplan can benefit draft Policy R9 and future housing development.

New link access from the proposed roundabout

New link access and improved access to future development site

A new link to the proposed roundabout on Herne Bay Road which will be implemented as part of redevelopment of the Broad Oak Farm site will facilitate a safe means of access to the site where vehicle speeds are controlled by the design of the roundabout which can also readily facilitate the small increase in traffic movements.

The proposed new link on the roundabout shown in drawing no. 31379/AC/002 complies with design standards in respect of the entry path curvature, the entry radius and entry angle, achieving appropriate forward visibility on the approach to the give way line and visibility to the right on the circulatory carriageway.

The proposed new link to the roundabout on Herne Bay Road provides the opportunity to extend the new link further east to connect to the site referred to as Land North of Popes Lane under Draft Policy R9. This site was the subject of a planning application ref: CA/18/01305 for housing that was refused at committee and a subsequent appeal dismissed ref: APP/J2210/W/18/3216104. The reason for the dismissal was due to several reasons, including the unacceptably severe cumulative impact on traffic flows, at various junctions including the A291 / Popes Lane junction which would operate very close to capacity.

Although the new link to the roundabout would not address the wider transport reasons for the appeal scheme being dismissed, it would address the capacity issues related to the A291 / Popes Lane junction. All development trips would be able to safely access the highway network via the new roundabout rather than the priority junction which are typically more prone to accidents than roundabouts where vehicle speeds are controlled by the nature of the roundabout geometry. It is expected that wider capacity issues at existing nearby junctions such as where the A28 crosses the railway line at a level crossing will be addressed in the future by the implementation of the Sturry Relief Road.

Furthermore, there is an existing Public Right of Way (PRoW) ref: CB58, which runs across our client's site. It is proposed that the existing PRoW is retained but diverted around the proposed housing development of Circa 20 units before linking back into its existing route and continuing its route to Popes Lane.

A Transport Note was previously prepared by TPP and further to the above, provides additional revisions including details of resiting the Bus Stop situated alongside the exit of the roundabout on Herne Bay Road, links to the Public Right of Way (PRoW) ref: CB58, and provision of footways to the newly proposed access road. The Transport Note is submitted again in support of these local plan representations to justify the revisions to draft Policy R9.

Allocation of housing development land located to the south of Milborough House

Given that the site is currently undeveloped and vacant, it has development potential in principle. In terms of land use, given Canterbury's housing need (outlined in these representations) and the character of the surrounding area, residential development would be most appropriate.

The proposed new link off the roundabout provides an opportunity for circa 20 no. residential dwellings to be sited on land to the south of Milborough House. A sketch masterplan ref: Site Plan has been produced by McConkey Architects (**See Appendices 5 – 7**). This residential layout plan has taken design cues from the recently completed Sweech Farm development which is adjacent to Milborough House. The development pattern is of a courtyard arrangement with dwellings

arrange in a barn cluster with a central courtyard and associated parking. This development pattern seeks to minimise the built footprint and maximise the green open spaces which will contribute to maintaining the Green Gap.

The proposed development will provide affordable housing in accordance with policy and subject to viability. The site is within a sustainable location as was previously outlined in the Call for Sites consultation representations (see Appendix 4).

Alteration and revision of the designated Green Gap

The site is in the designated Green Gap which exists between Sturry and Broad Oak. The Green Gap extends on both sides of Herne Bay Road. To the west on Herne Bay Road is the strategic housing allocation at Broad Oaks for 1,000 houses, which proposes an arm of development within the Green Gap. The proposals include open space and landscape buffering to provide suitable separation. This representation proposes a similar approach on our client's land.

It is clear that the areas of Broad Oak and Sturry are going to change over the coming years to accommodate some of the district's housing requirement – this approach is supported; the settlements are sustainable locations for housing growth. On this basis, sensitive schemes which provide a degree of landscape buffering and open space should be supported to assist in much needed housing supply (discussed above).

Our client's site would retain and enhance landscaping around its perimeter which would assist in contributing to a rural design which respects the surrounding landscape. Notwithstanding this, our client's site is some 60m from Sturry to the south and as such, there is currently good separation.

This local plan representation is supported by the following documents:

- Completed Local Plan Consultation Online Questionnaire.
- Local Plan Representations Cover Letter (This document).
- Previous Regulation 18 Draft Canterbury District Local Plan to 2045 Representation (Appendix 1)
- KCC Highways Pre-application Enquiry (Appendix 2)
- KCC Highways Pre-application Response (Appendix 3)
- Previous Call for Site Representation (Appendix 4)
- Transport Note prepared by TPA.
- Architectural Drawings Prepared by McConkey Architects.
 - o Location Plan (Appendix 5)
 - o Site Plan (Appendix 6)
 - o Sweech Farm Design Precedent (Appendix 7)

SUMMARY AND CONCLUSION

The foregoing commentary confirms that the revisions to the masterplan for the residential allocation under draft Policy R9, will assist in unlocking the adjoining site by addressing the transport considerations that were raised by the Inspector in the dismissed appeal ref: APP/J2210/W/18/3216104. Widening the residential allocation to incorporate our client's site, will provide an opportunity to provide a further 20 no. units to the land to the south of Milborough House and increase the provision of residential quantum which will further contribute to meeting Canterbury City Council's housing need.

We would be happy to discuss the site in further detail if it would assist. In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part of this Draft Canterbury District Local Plan 2020 to 2040 consultation exercise.

Yours faithfully,

Abraham Laker

Abraham Laker (May 31, 2024 12:15 GMT+1)

Abraham Laker

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Associate Partner

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APPENDIX 1: REGULATION 18 DRAFT CANTERBURY DISTRICT LOCAL PLAN 2045
REPRESENTATION

Planning Policy Department
Canterbury City Council
Council Offices
Military Road
Canterbury
CT1 1YW

Our ref: AL/17/04451

Date: 16 January 2023

Dear Sirs,

RE: REPRESENTATIONS FOR THE DRAFT CANTERBURY DISTRICT LOCAL PLAN TO 2045 CONSULTATION – LAND ADJACENT TO MILBOROUGHS – RESIDENTIAL ALLOCATION UNDER DRAFT POLICY R18 (LAND TO THE NORTH OF POPES LANE).

We act on behalf of Mr Paul Crayford and write in respect on the above consultation. The site is currently undeveloped land located adjacent to the settlement of Broad Oak and near to the larger village of Sturry.

Canterbury City Council have allocated residential development land under draft Policy R18 (Land to the North of Popes Lane), which is adjacent to our client's site. However, to unlock this future residential development site, the transport considerations that were raised by the Inspector in the dismissed appeal ref: APP/J2210/W/18/3216104 will need to be addressed. We believe that widening the residential allocation to incorporate our client's site, will address the transport matters, unlock the Draft Policy R18 site for residential development and provide an opportunity for additional housing on our client site. This approach will maximise the residential quantum, further contributing to meeting Canterbury City Council's housing need targets. The Green Gap will also still be retained. Therefore, the revision we propose within these representations to draft Policy R18 should be reflected across future policies prepared by the Local Authority.

SITE AND SURROUNDINGS

The site is currently undeveloped and measures 1 ha and is located adjacent/near to the villages of Broad Oak and Sturry, the latter being a settlement where development is driven under the rural settlement hierarchy.

To the north of the site is Milborough House, beyond which are three Grade II listed structures (Sweech Farmhouse and the associated barn and stable). To the east is a field in agricultural use, which has recently been subject to a refused planning appeal. To the south is a strip of undeveloped land, beyond which is the development boundary of Sturry and residential development. To the west – on the other side of Herne Bay Road, is a strategic allocation (Broad Oak Farm) for 1,000 dwellings (alongside business, retail, and community development). The settlement of Broad Oak begins to the north west of the site, on the other side of Herne Bay Road. This includes some housing in the Green Gap near Herne Bay Road Frontage.

The site is currently located outside the settlement boundary and within the Green Gap however, as discussed in more detail below, is in an area that is undergoing substantial redevelopment.

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Rapleys LLP is registered as a limited liability partnership in England and Wales. Registration No. OC306311
Registered Office: Unit 3a The Incubator The Boulevard, Enterprise Campus, Alconbury Woods, Huntingdon. PE28 4DA Registered by RICS

Additionally, the site is located within the 7.2km area of the Thanet Coast and Sandwich Bay Special Area of Conservation (SAC). It is understood there are no other planning constraints which would prevent development from coming forward.

PLANNING HISTORY

A review of the Council's planning database suggests that there is no relevant planning history on the site. There is, however, relevant planning history on nearby sites:

- Broad Oak - The site is allocated within the Local Plan for 1,000 dwellings – with a live application to provide a total of 912 units along with retail and employment use.
- Popes Lane - The development proposed the erection of up to 140 Dwellings – appeal dismissed September 2019. The Inspector found that the Council were unable to demonstrate a five-year supply of deliverable sites. However, the sole reason for the appeal being dismissed appears to have been the anticipated impact on transport, which the Inspector regarded as significant and unacceptable.

LOCAL PLAN CONSULTATION HISTORY

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HOUSING REQUIREMENT & DELIVERY

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- 2011/12 to 2015/16 500 dwellings per annum (dpa);
- 2016/17 to 2030/31 900 dpa.

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Table B.1 Net completions within Canterbury District

Monitoring Year	Residential Dwelling Completions	Student Accommodation Completions	Care home and other specialists Completions	Total Completions
2011/12	624	15	16	655
2012/13	524	105	-32	597
2013/14	475	156	10	641
2014/15	285	237	32	555
2015/16	296	275	23	594
2016/17	417	40	-35	422
2017/18	446	679	-6	1,119
2018/19	405	7	32	444
2019/20	528	22	47	597
2020/21	330	117	27	474
2021/22	553	248	-10	791

Figure 4.2 and Table B.1 identify that the Council have previously delivered above 500 units total completions in 2011/12 (655 units), 2012/13 (597 units), 2013/14 (641 units), 2014/15 (555 units) and

2015/16 (594 units), which is consistent with the stepped annual requirement established by the CDLP 2011.

In line with the stepped requirement from 2016 - 2031 the housing land supply trajectory increases to 900 dpa. Year 2016/17 the Council completion rates was 422 units which is 478 units below the annual requirement. In 2017/18 the Council reported completion of 1,119 units which is the first year in which the housing requirement has been above the 900 dpa target. In years 2018/19 (444 units), 2019/20 (597 units), 2020/21 (474 units) and 2021/22 (791 units), demonstrates that the Council have delivered well below the target of 900 dpa.

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The housing trajectory has been changed from the projections that were published in the Local Plan. The monitoring report published in April 2021 to March 2022 suggests that the bulk of the housing will be delivered later in the Plan period peaking in 2027/28 (1,361 units). However, based on previous completion rates being below the stepped annual requirement of 900dpa, it is considered unrealistic that such a completion rate will be achieved.

The bulk of the housing is to be delivered through 12 strategic sites which were allocated in the 2006 Local Plan, and which have been carried through in the 2017 Plan. These sites will collectively provide around 16,000 units. In the 2017 Local Plan, delivery of these sites was expected to have started on all of them by 2018/19. The 2021/22 monitoring report outlines work has started on site at eight of the strategic sites, with four granted outline permissions. Based on these findings, the housing market appears to be significantly pressurised within the Local Authority area, with a history of sustained under-provision.

DRAFT CANTEBURY DISTRICT LOCAL PLAN TO 2045 SITE ALLOCATION

Draft Policy R18 (Land north of Popes Lane) within the Draft Canterbury District Local Plan to 2045 includes our client's site though wholly designated within the Green Gap element of this allocation.



This Policy provides a concept masterplan and allocates the site for the residential development, subject to meeting the following development mix criteria:

Across the site, which measures 9.31 ha the development mix will include:

- a) Approximately 110 new dwellings across circa 3.12 ha;
 - i. 30% affordable housing in line with Policy DS1
 - ii. 10% bungalows
 - iii. 15% of new homes to be built to M4 (2) standards, and 5% to be built to M4 (3) standards
 - iv. An appropriate housing mix, in line with Policy DS2; and
 - v. Self and custom-built plots in line with Policy DS2.

The residential allocation within draft Policy R18 is welcomed, however it is our view that the concept masterplan should be revised to ensure that the sites residential development potential is maximised for a sustainable development through allocating a proportion of housing on our client's land. The current proposed access along Popes Lane is inadequate and unsafe.

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These representations seek amendments to the development masterplan under draft Policy R18 to incorporate our client's site. The revisions to the masterplan are as follows:

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The proposed new link on the roundabout shown in drawing no. 31379/AC/002 complies with design standards in respect of the entry path curvature, the entry radius and entry angle, achieving

appropriate forward visibility on the approach to the give way line and visibility to the right on the circulatory carriageway.

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Furthermore, there is an existing Public Right of Way (PRoW) ref: CB58, which runs across our client's site. It is proposed that the existing PRoW is retained but diverted around the proposed housing development of Circa 20 units before linking back into its existing route and continuing its route to Popes Lane.

A Transport Note has been prepared by TPP and further to the above, provides additional revisions including details of resiting the Bus Stop situated alongside the exit of the roundabout on Herne Bay Road, links to the Public Right of Way (PRoW) ref: CB58, and provision of footways to the newly proposed access road. The Transport Note is submitted in support of these local plan representations to justify the revisions of the concept masterplan under draft Policy R18.

Allocation of housing development land located to the south of Milborough House

Given that the site is currently undeveloped and vacant, it has development potential in principle. In terms of land use, given Canterbury's housing need (outlined in these representations) and the character of the surrounding area, residential development would be most appropriate.

The proposed new link off the roundabout provides an opportunity for circa 20 no. residential dwellings to be sited on land to the south of Milborough House. A sketch masterplan ref: Site Plan has been produced by McConkey Architects. This residential layout plan has taken design cues from the recently completed Sweech Farm development which is adjacent to Milborough House. The development pattern is of a courtyard arrangement with dwellings arranged in a barn cluster with a central courtyard and associated parking. This development pattern seeks to minimise the built footprint and maximise the green open spaces which will contribute to maintaining the Green Gap.

The proposed development will provide affordable housing in accordance with policy and subject to viability. The site is within a sustainable location as was previously outlined in the Call for Sites consultation representations (see Appendix 1)

Alteration and revision of the designated Green Gap

The site is in the designated Green Gap which exists between Sturry and Broad Oak. The Green Gap extends on both sides of Herne Bay Road. To the west on Herne Bay Road is the strategic housing allocation at Broad Oaks for 1,000 houses, which proposes an arm of development within

the Green Gap. The proposals include open space and landscape buffering to provide suitable separation. This representation proposes a similar approach on our client's land.

It is clear that the areas of Broad Oak and Sturry are going to change over the coming years to accommodate some of the district's housing requirement – this approach is supported; the settlements are sustainable locations for housing growth. On this basis, sensitive schemes which provide a degree of landscape buffering and open space should be supported to assist in much needed housing supply (discussed above).

Our client's site would retain and enhance landscaping around its perimeter which would assist in contributing to a rural design which respects the surrounding landscape. Notwithstanding this, our client's site is some 60m from Sturry to the south and as such, there is currently good separation.

This local plan representation is supported by the following documents:

- Completed Local Plan Consultation Online Questionnaire.
- Local Plan Representations Cover Letter (This document).
- Transport Note prepared by TPP.
- Architectural Drawings Prepared by McConkey Architects.
 - o Location Plan (Appendix 2)
 - o Site Plan (Appendix 3)
 - o Sweech Farm Design Precedent (Appendix 4)

SUMMARY AND CONCLUSION

The foregoing commentary confirms that the revisions to the masterplan for the residential allocation under draft Policy R18, will assist in unlocking the adjoining site by addressing the transport considerations that were raised by the Inspector in the dismissed appeal ref: APP/J2210/W/18/3216104. Widening the residential allocation to incorporate our client's site, will provide an opportunity to provide a further 20 no. units to the land to the south of Milborough House and increase the provision of residential quantum which will further contribute to meeting Canterbury City Council's housing need.

We would be happy to discuss the site in further detail if it would assist. In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part of this Draft Canterbury District Local Plan 2020 to 2045 consultation exercise.

Yours faithfully,

Abraham Laker

Abraham Laker (Jan 16, 2023 10:47 GMT)

Abraham Laker
BA (Hons) MA MRTPI FRSA
Senior Associate
abraham.laker@rapleys.com
07988 425449

RAPLEYS

Kent County Council
Highways Department
Kroner House
Eurogate Business Park
Ashford
TN24 8XU

Our ref: AL/17/04451
Date: 13 July 2023

Dear Sir/Madam,

RE: KENT COUNTY COUNCIL (KCC) HIGHWAYS PRE-APPLICATION ENQUIRY FOR LAND ADJACENT TO MILBOROUGH

I write to you on behalf of Mr Paul Crayford, to request highways pre-application advice from Kent County Council (KCC) Highways department regarding land adjacent to Milborough. This enquiry has come at the request of the Canterbury City Council Policy Officers following the recent submission of representations to the draft Canterbury District Local Plan to 2045 consultation.

The site is currently undeveloped land located adjacent to the settlement of Broad Oak and near to the larger village of Sturry.

Canterbury City Council have allocated residential development land under draft Policy R18 (Land to the North of Popes Lane), which is adjacent to our client's site. However, to unlock this future residential development site, the transport considerations that were raised by the Inspector in the dismissed appeal ref: APP/J2210/W/18/3216104 will need to be addressed.

We believe that widening the residential allocation to incorporate our client's site, will address the transport matters, unlock the Draft Policy R18 site for residential development and provide an opportunity for additional housing on our client site. This approach will maximise the residential quantum, further contributing to meeting Canterbury City Council's housing need targets. The Green Gap will also still be retained. Therefore, the revision we propose to draft Policy R18 should be reflected across future policies prepared by the Local Authority.

SITE AND SURROUNDINGS

The site is currently undeveloped and measures 1 ha and is located adjacent/near to the villages of Broad Oak and Sturry, the latter being a settlement where development is driven under the rural settlement hierarchy.

To the north of the site is Milborough House, beyond which are three Grade II listed structures (Sweech Farmhouse and the associated barn and stable). To the east is a field in agricultural use, which has recently been subject to a refused planning appeal. To the south is a strip of undeveloped land, beyond which is the development boundary of Sturry and residential development. To the west – on the other side of Herne Bay Road, is a strategic allocation (Broad Oak Farm) for 1,000 dwellings (alongside business, retail, and community development). The settlement of Broad Oak begins to the north west of the site, on the other side of Herne Bay Road. This includes some housing in the Green Gap near Herne Bay Road Frontage.

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Registered Office: Unit 2a The Incubator The Boulevard, Enterprise Campus, Alconbury Wells, Huntingdon, PE29 4XA Regulated by RICS

The site is currently located outside the settlement boundary and within the Green Gap however, as discussed in more detail below, is in an area that is undergoing substantial redevelopment.

PLANNING HISTORY

A review of the Council's planning database suggests that there is no relevant planning history on the site. There is, however, relevant planning history on nearby sites:

- Broad Oak - The site is allocated within the Local Plan for 1,000 dwellings – with a live application to provide a total of 912 units along with retail and employment use.
- Popes Lane - The development proposed the erection of up to 140 Dwellings – appeal dismissed September 2019. The Inspector found that the Council were unable to demonstrate a five-year supply of deliverable sites. However, the sole reason for the appeal being dismissed appears to have been the anticipated impact on transport, which the Inspector regarded as significant and unacceptable.

LOCAL PLAN CONSULTATION HISTORY

More recently the applicant's site was put forward through written representations to the to the draft Canterbury District Local Plan to 2045 consultation (see appendix 1), with Canterbury City Council Policy Officers requesting that a pre-application enquiry is sent to KCC Highways (see appendix 2).

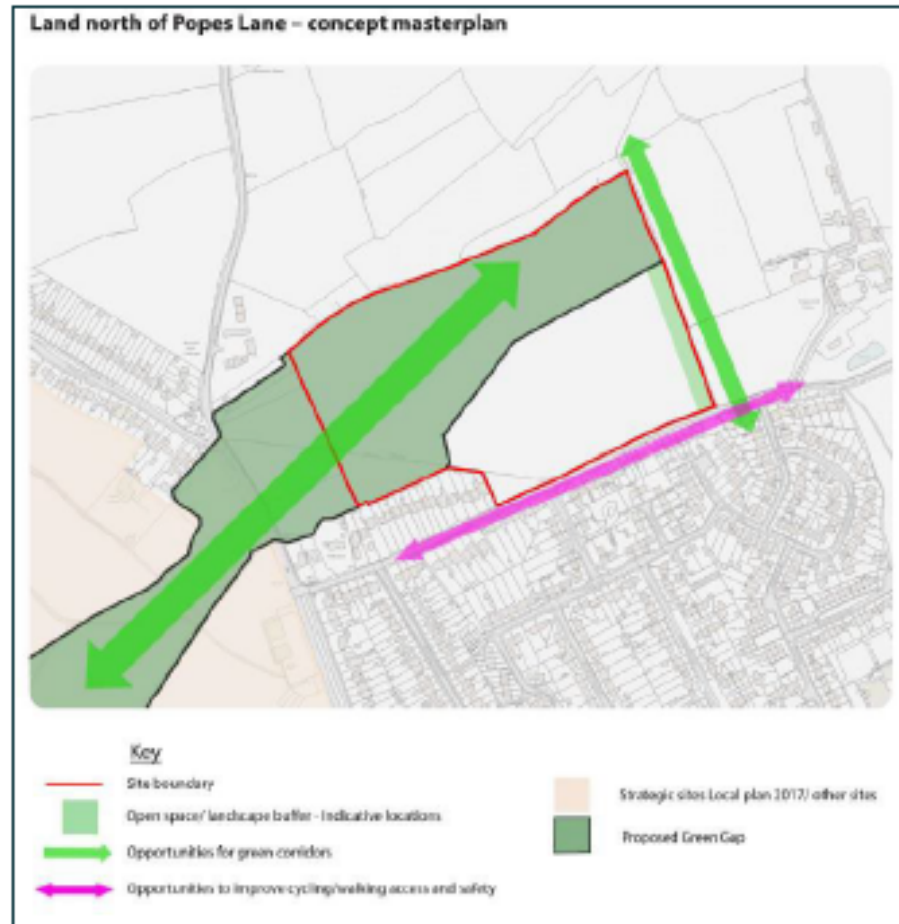
Our client's site was previously put forward to the Canterbury City Council Call for Sites consultation under ref: SLAA091 (see Appendix 3), which closed in June 2020. The call for sites submission promoted the site for residential development to contribute to the Councils housing need.

Development on this site was envisaged to accommodate circa 40 units – of which affordable housing would be provided in accordance with policy, subject to viability and further detailed design work being undertaken. The Council reviewed the site and concluded that the site was technically suitable but conflicts with existing policy.

The site allocated under draft Policy R18 was promoted through the same Call for Sites consultation under ref: SLAA126 (Commercial) and SLAA011 (Housing). Site SLAA011 is now allocated under draft Policy R18 for potential housing development. The Council identified that site ref: SLAA011 to be suitable, available, and achievable. However, the reason raised by the Inspector in the dismissed appeal related to the anticipated impact on transport, which will still need to be addressed to unlock (make it achievable) this site for future housing development.

DRAFT CANTEBURY DISTRICT LOCAL PLAN TO 2045 SITE ALLOCATION

Draft Policy R18 (Land north of Popes Lane) within the Draft Canterbury District Local Plan to 2045 includes our client's site though wholly designated within the Green Gap element of this allocation.



This Policy provides a concept masterplan and allocates the site for the residential development, subject to meeting the following development mix criteria:

Across the site, which measures 9.31 ha the development mix will include:

- a) Approximately 110 new dwellings across circa 3.12 ha.
 - i. 30% affordable housing in line with Policy DS1
 - ii. 10% bungalows
 - iii. 15% of new homes to be built to M4 (2) standards, and 5% to be built to M4 (3) standards
 - iv. An appropriate housing mix, in line with Policy DS2; and
 - v. Self and custom-built plots in line with Policy DS2.

The residential allocation within draft Policy R18 is welcomed, however it is our view that the concept masterplan should be revised to ensure that the sites residential development potential is

maximised for a sustainable development through allocating a proportion of housing on our client's land. The current proposed access along Popes Lane is inadequate and unsafe.

PROPOSED DEVELOPMENT MASTERPLAN REVISIONS

These proposed amendments to the development masterplan under draft Policy R18 to incorporate our client's site. The revisions to the masterplan are as follows:

Transport & Highways

- New link access from the Broad Oak development proposed roundabout.

Housing Land

- Allocation of housing development land to the south of Milborough House.

Environmental

- Alteration and revision of the designated Green Gap.

PROPOSED REVISION TO MASTERPLAN ASSESSED AGAINST DRAFT POLICY R18

This approach is further examined in the following section and assesses how the revised masterplan can benefit draft Policy R18 and future housing development.

New link access from the proposed roundabout

New link access and improved access to future development site

A new link to the proposed roundabout on Herne Bay Road which will be implemented as part of redevelopment of the Broad Oak Farm site will facilitate a safe means of access to the site where vehicle speeds are controlled by the design of the roundabout which can also readily facilitate the small increase in traffic movements.

The proposed new link on the roundabout shown in drawing no. 31379/AC/002 complies with design standards in respect of the entry path curvature, the entry radius and entry angle, achieving appropriate forward visibility on the approach to the give way line and visibility to the right on the circulatory carriageway.

The proposed new link to the roundabout on Herne Bay Road provides the opportunity to extend the new link further east to connect to the site referred to as Land North of Popes Lane under Draft Policy R18. This site was the subject of a planning application ref: CA/18/01305 for housing that was refused at committee and a subsequent appeal dismissed ref: APP/J2210/W/18/3216104. The reason for the dismissal was due to several reasons, including the unacceptably severe cumulative impact on traffic flows, at various junctions including the A291 / Popes Lane junction which would operate very close to capacity.

Although the new link to the roundabout would not address the wider transport reasons for the appeal scheme being dismissed, it would address the capacity issues related to the A291 / Popes Lane junction. All development trips would be able to safely access the highway network via the new roundabout rather than the priority junction which are typically more prone to accidents than roundabouts where vehicle speeds are controlled by the nature of the roundabout geometry.

It is expected that wider capacity issues at existing nearby junctions such as where the A28 crosses the railway line at a level crossing will be addressed in the future by the implementation of the Sturry Relief Road.

Furthermore, there is an existing Public Right of Way (PRoW) ref: CB58, which runs across our client's site. It is proposed that the existing PRoW is retained but diverted around the proposed

housing development of Circa 20 units before linking back into its existing route and continuing its route to Popes Lane.

A Transport Note has been prepared by TPP and further to the above, provides additional revisions including details of resiting the Bus Stop situated alongside the exit of the roundabout on Herne Bay Road, links to the Public Right of Way (PRoW) ref: CB58, and provision of footways to the newly proposed access road. The Transport Note was submitted in support of these local plan representations to justify the revisions of the concept masterplan under draft Policy R18 and is also provided as part of this KCC Highways pre-application enquiry.

Allocation of housing development land located to the south of Milborough House

Given that the site is currently undeveloped and vacant, it has development potential in principle. In terms of land use, given Canterbury's housing need (outlined in these representations) and the character of the surrounding area, residential development would be most appropriate. The proposed new link off the roundabout provides an opportunity for circa 20 no. residential dwellings to be sited on land to the south of Milborough House. A sketch masterplan ref: Site Plan has been produced by McConkey Architects. This residential layout plan has taken design cues from the recently completed Sweech Farm development which is adjacent to Milborough House.

The development pattern is of a courtyard arrangement with dwellings arranged in a barn cluster with a central courtyard and associated parking. This development pattern seeks to minimise the built footprint and maximise the green open spaces which will contribute to maintaining the Green Gap.

The proposed development will provide affordable housing in accordance with policy and subject to viability.

Alteration and revision of the designated Green Gap

The site is in the designated Green Gap which exists between Sturry and Broad Oak. The Green Gap extends on both sides of Herne Bay Road. To the west on Herne Bay Road is the strategic housing allocation at Broad Oaks for 1,000 houses, which proposes an arm of development within the Green Gap. The proposals include open space and landscape buffering to provide suitable separation.

This residential development proposes a similar approach on our client's land.

It is clear that the areas of Broad Oak and Sturry are going to change over the coming years to accommodate some of the district's housing requirement – this approach is supported; the settlements are sustainable locations for housing growth. On this basis, sensitive schemes which provide a degree of landscape buffering and open space should be supported to assist in much needed housing supply (discussed above).

Our client's site would retain and enhance landscaping around its perimeter which would assist in contributing to a rural design which respects the surrounding landscape. Notwithstanding this, our client's site is some 60m from Sturry to the south and as such, there is currently good separation.

CONTENT OF SUBMISSION

This KCC Highways Pre-application enquiry is supported by the following document:

- Pre-application Cover Letter
- Transport Note prepared by TPP
- Architectural Drawings Prepared by McConkey Architects

- Canterbury City Council Officers request for KOC Highways Pre-application enquiry (Appendix 1)
- Representations for the draft Canterbury District Local Plan to 2045 Consultation (Appendix 2)
- Location Plan (Appendix 3)
- Site Plan (Appendix 4)

- Sweech Farm Design Precedent (Appendix 5)

- Pre-application fee of £850.00 plus VAT

SUMMARY AND CONCLUSION

The foregoing commentary confirms that the revisions to the masterplan for the residential allocation under draft Policy R18, will assist in unlocking the adjoining site by addressing the transport considerations that were raised by the Inspector in the dismissed appeal ref: APP/J2210/W/18/3216104. Widening the residential allocation to incorporate our client's site, will provide an opportunity to provide a further circa 20 no. units to the land to the south of Milborough House and increase the provision of residential quantum which will further contribute to meeting Canterbury City Council's housing need.

We would be happy to discuss the site in further detail if it would assist. If you require any further information regarding the proposals, please do not hesitate to contact myself or Abraham Laker.

Yours faithfully,

Abraham Laker

Abraham Laker (Jul 14, 2023 08:49 GMT+1)

Abraham Laker
BA (Hons) MA FRTPI FRSA
Associate Partner
Abraham.Laker@rapleys.com
07988425449

Appendix 1: Canterbury City Council Officers request for KCC Highways Pre-application enquiry

Re: Land adjacent to Milboroughs

Milene Wojda milene.wojda@canterbury.gov.uk
To: [Sharon Laker](#)
Cc: [Simon Parr](#)

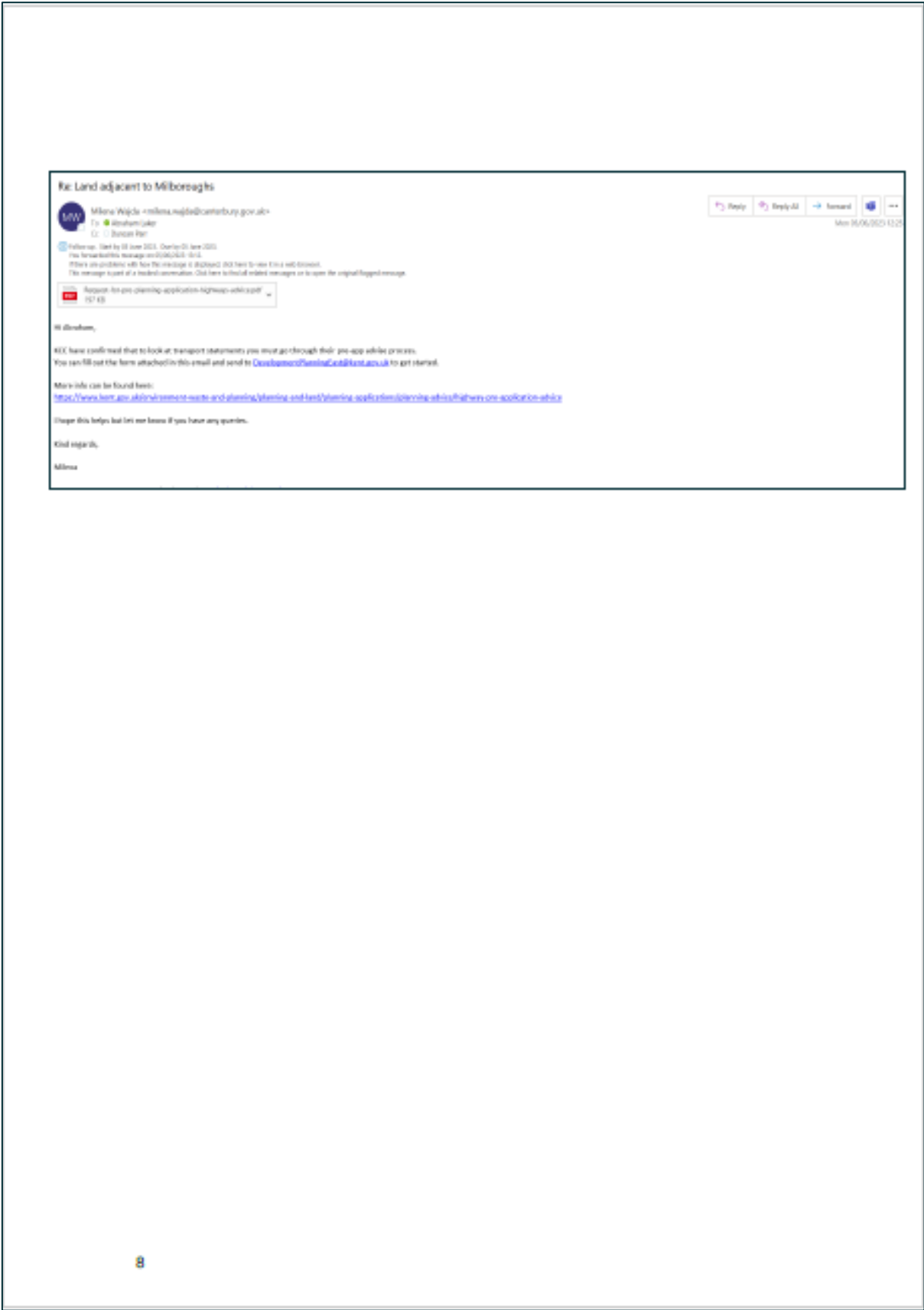
11:46 AM
View source | Report problem | Download pictures | Print | Unsubscribe | Help

Hi Sharon,

I am writing in response to the representations you submitted to the Canterbury City Council's draft Local Plan consultation regarding site Land adjacent to Milboroughs.

I would like to know if you have sent your Transport Note and proposed access plans to KCC Highways for their review and comment?

Kind regards,
--
Milene Wojda
Policy Officer (Planning)
Canterbury City Council



APPENDIX 3: KCC HIGHWAYS PRE-APPLICATION RESPONSE



Highways and Transportation
Kroner House

Eurogate Business Park
Ashford

TN24 8XU

Tel: 03000 418181

Date: 14 September 2023

Our Ref: FW

Abraham Laker

Abraham.Laker@rapleys.com

Application - PAP/2023/54

Location - Land adjacent to Milborough, Herne Bay Road, - Broad Oak

Proposal - Proposal for 20 units

Dear Abraham

Thank you for your request for pre-planning application advice and our subsequent meeting on Thursday 7th September.

A Scoping Note has been submitted, and having reviewed this I have the following comments to make.

The proposals are for 20 dwellings to be accessed off a fourth arm on the newly constructed roundabout on the A291 Herne Bay Road, to the immediate south of the junction with Sweechgate.

There is also the potential for this new access to serve site R18 within Canterbury City Councils emerging local plan. We note that this proposed access is something that may be beneficial.

Access

This would initially appear acceptable, with 3m wide footway/cycle path along with a 1m verge. A Stage 1 Road Safety Audit would be required along with Designers Response should a planning application be made.

Plans demonstrating the swept path for an 11.4m long refuse vehicle will be required, showing both the roundabout and the access into the site. There must be sufficient provision of turning space, to ensure this size vehicle can enter and exit in a forward gear.

The bus stop is proposed to be moved to utilise a layby layout. I have forwarded your indicative drawing to our Bus Stop team, but am still awaiting their response, I will come back to you in due course with their views on this part of the proposal.

I concur with the TRICS data, please ensure full data is submitted as part of any planning application submission.

Internal site layout

Parking allocation should follow that set out in Canterbury City Councils Local Plan - Appendix 4

Local Parking Standards.

Visitor parking spaces should also be provided at the ratio of 0.2 spaces per dwelling.

Car parking spaces should measure 2.5m x 5m, if they abut a fence/hedge then a width of 2.7m should be provided. In addition there must be the provision of 6m reversing space behind each car parking space.

Each dwelling is required to have an Electric Vehicle charging point. If a communal car park is to be provided and the spaces unallocated, then we require 10% active provision and 90% passive provision for the total number of parking spaces.

Secure, enclosed bicycle storage is required for each dwelling at the ratio of one space per bedroom. This could be in the form of a shed in the rear garden, but there must be the provision of direct access to the highway from any rear garden space.

A communal storage area can be provided, but it should be well overlooked.

Public Right of Way

The proposed plans will result in the diversion of PROW CB59. You will need to consult with our PROW team, who can be contacted at the following address: eastprow@kent.gov.uk

Highway works

We would expect the developer to implement the proposed highway works under a S38/S278 Agreement.

We would not seek to take financial contributions towards for these works.

Financial Contributions

Whilst I stated in our meeting that I would not expect this development to make any financial contributions, having checked with a colleague, other developments within this location have been expected to make contributions towards walking/cycling improvements and the Sturry Link Road, and this is on a pro-rata basis on the number of dwellings.

As such it would be expected for this development to make appropriate financial contributions.

All new developments are expected to focus on Active Travel and sustainable transport. All applications should demonstrate how they meet this, and include details on they can enhance the existing provisions within the locality.

I hope the above proves useful, if you have any further questions then please do not hesitate to contact me.

Yours Faithfully

Fiona Wiles

Senior Transport & Development Planner

Important Notes

Any advice given by Council officers for pre-application enquiries does not indicate a formal decision by the Council as the Highway Authority. Any views or opinions are given in good faith, and to the best of ability, without prejudice to the formal consideration of any planning application.

The final decision on any application that you may then make can only be taken after the Planning Authority has consulted local people, statutory consultees and any other interested parties. The final decision on an application will then be made by senior officers or by the respective Local Planning Authority and will be based on all of the information available at that

time.

You should therefore be aware that officers cannot guarantee the final formal decision that will be made on your application(s).

Any pre-application advice that has been provided will be carefully considered in reaching a decision or recommendation on an application; subject to the proviso that circumstances and information may change or come to light that could alter that position.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. To assist developers and designers, KCC offer a free outline technical review of proposals affecting highway assets. This is separate from the planning process but will help ensure that your proposals will be acceptable to the highway authority at the implementation stage. To find out more and request an application form, email: assetmanagement@kent.gov.uk

It should be noted that the weight given to pre-application advice will decline over time.

MJB/

29 June 2020

Planning Policy Department
Canterbury City Council
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Canterbury
CT1 1YW

33 Jermyn Street
London SW1Y 6DN

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info@rapleys.com
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LONDON
BIRMINGHAM
BRISTOL
CAMBRIDGE
EDINBURGH
HUNTINGDON
MANCHESTER

Dear Sir/Madam,

Re: CALL FOR SITES CONSULTATION – CANTERBURY CITY COUNCIL - LAND ADJACENT TO MILBOROUGHS

We act on behalf of John and Paul Crayford and write in respect of the above consultation. The site (location plan attached) is currently undeveloped land located adjacent to the settlement of Broad Oak and near to the larger village of Sturry.

These representations confirm that the site is suitable, available and achievable. Therefore, the site should be confirmed as being deliverable within the emerging evidence base and capable of contributing to meeting Canterbury's need for housing. Beyond this, the site should be allocated for residential use in any future policies prepared by the Local Authority.

SITE AND SURROUNDINGS

The site is currently undeveloped and measures 1 ha and is located adjacent/near to the villages of Broad Oak and Sturry, the latter being a settlement where development is driven under the rural settlement hierarchy.

To the north of the site is Milborough House, beyond which are three Grade II listed structures (Sweech Farmhouse and the associated barn and stable). To the east is a field in agricultural use, which has recently been subject to a refused planning appeal. To the south is a strip of undeveloped land, beyond which is the development boundary of Sturry and residential development. To the west – on the other side of Herne Bay Road, is a strategic allocation (Broad Oak Farm) for 1,000 dwellings (alongside business, retail, and community development). The settlement of Broad Oak begins to the north west of the site, on the other side of Herne Bay Road.

The site is currently located outside the settlement boundary and within the Green Gap however, as discussed in more detail below, is in an area that is undergoing substantial redevelopment. Additionally, the site is located within the 7.2km area of the Thanet Coast and Sandwich Bay Special Area of Conservation (SAC).

It is understood there are no other planning constraints which would prevent development from coming forward.

PLANNING HISTORY

A review of the council's planning database suggests that there is no relevant planning history on the site. There is, however, relevant planning history on nearby sites:

- Broad Oak - The site is allocated within the Local Plan for 1,000 dwellings – with a live application to provide a total of 912 units along with retail and employment use.
- Popes Lane - The development proposed the erection of up to 140 Dwellings – appeal dismissed September 2019. The Inspector found that the Council were unable to demonstrate a five-year supply of deliverable sites. However, the sole reason for the appeal being dismissed appears to have been the anticipated impact on transport, which the Inspector regarded as significant and unacceptable.

HOUSING REQUIREMENT

The Local Plan (2017) sets a requirement of 11,700 units over the Plan period (2011-2031). This is stepped:

- 2011-2016 - 500 dwellings per annum (dpa);
- 2016-2031 - 900 dpa.

HOUSING DELIVERY

The council delivered 500 units in 2011/12, 2012/13 and 2013/14. However, in 2014/15 the completion rate fell to 333, dropping further to 296 in 2015/16. In 2016/17 the council reported a net addition of 413 units (the first year in which the housing requirement rose to 900 dpa). Over the most recent two years the council delivered (1,119 & 444) an average of 782, well below the target of 900 dpa.

HOUSING SUPPLY

The housing trajectory has been changed from the projections that were published in the Local Plan. The monitoring report published in April 2018 suggests that the bulk of the housing will be delivered later in the Plan period (peaking in 2023/24 as opposed to 2019/20). The overall delivery over the period 2018/19 to 2030/31 has also been reduced from 14,403 to 14,012.

The bulk of the housing is to be delivered through 12 strategic sites which were allocated in the 2006 Local Plan, and which have been carried through in the 2017 Plan. These sites will collectively provide around 11,500 units. In the 2017 Local Plan, delivery of these sites was expected to have started on all of them by 2018/19. The 2017/18 monitoring report pushes many of these back to 2021. 2018/19 monitoring report outlines work has started on site at three and three more have been granted outline permissions.

Based on these findings, the housing market appears to be significantly pressurised within the Local Authority area, with a history of sustained under-provision.

SITE ASSESSMENT

National Planning Practice Guidance (NPPG) confirms that land availability assessments / call for sites should:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (and therefore, in terms of the latter, a site's availability and achievability).

Identification and Development Potential

The site's location is outlined on the attached site location plan. The site is circa 1ha and located in a sustainable location near to the existing settlements of Broad Oak and Sturry.

Given that the site is currently undeveloped and vacant, the site evidently has development potential in principle. In terms of land use, given Canterbury's housing need (outlined above) and the character of the surrounding area, residential development would be most appropriate.

The sites development potential, in terms of quantum will be subject to further design work. However, it is envisaged that the site can accommodate circa 40 units – of which affordable housing would be provided in accordance with policy, subject to viability

Availability

The site is currently a vacant greenfield and the landowners have agreed to promote the site for redevelopment. Subject to gaining planning permission there are no restrictions which would prevent development starting straight away. We are not aware of any covenants or legal restrictions which would prevent development. On this basis, the site is available.

Achievability

As previously indicated, the site is currently vacant and unoccupied. As such, the site is unencumbered by current uses that would need to be relocated. Further, the landowners are not aware of any issues that might affect the viability of the site and prevent it from being brought forward – it is, therefore "achievable".

Suitability

Principle

Within the four-tier settlement hierarchy, Sturry is designated a rural service centre (the highest tier, and the only settlement within the category). Broad Oak classified is a village (the third in the hierarchy).

Planning policy notes, the provision of new housing that is of a size, design, scale, character and location appropriate to the character and built form of the rural service centres (Sturry) will be supported provided that such proposals are not in conflict with other Local Plan policies. In villages (e.g. Broad Oak) priority will be given to protecting the rural character of the district and infill development of an amount appropriate to the size of the

settlement (or development to meet an identified local need for affordable housing), in a location appropriate to the form of the settlement and of a design and scale that respects and enhances the character of the village.

Considering the above, the site is located in a sustainable location near to the settlement of Sturry, a category 1 rural settlement. The site is located circa 10 minutes' walk from Sturry train station which provides direct access to London St Pancras. Further, there are substantial services and facilities located within Broad Oak and Sturry (including schools, retail and leisure) which are all located within 1km – the majority of which are a lot closer. Additionally, Canterbury City Centre is accessible in circa 15/20min using regular public transport which provides a greater variety of services for residents.

While currently outside the settlement boundaries, this sustainable site should be included in the settlement, in future iterations of the Local Plan, to help delivery housing within the district. The site is of a suitable size and complies with the Council's preference of an increase in small size sites of less than 1ha. This allocation will help alleviate pressure for development on less sustainable sites which aren't located in close proximity to services and facilities.

Green Gap

The site is located in the designated Green Gap which exists between Sturry and Broad Oak. The Green Gap extends on both sides of Herne Bay Road. To the west on Herne Bay Road is the strategic housing allocation at Broad Oaks for 1,000 houses, which proposes an arm of development within the Green Gap. The proposals include open space and landscape buffering to provide suitable separation.

It is clear that the areas of Broad Oak and Sturry are going to change over the coming years to accommodate some of the district's housing requirement – this approach is supported; the settlements are sustainable locations for housing growth. On this basis, sensitive schemes which provide a degree of landscape buffering and open space should be supported to assist in much needed housing supply (discussed above). Our client's site would retain and enhance landscaping around its perimeter which would assist in contributing to a rural design which respects the surrounding landscape. Notwithstanding this, our client's site is some 60m from Sturry to the south and as such, there is currently good separation.

7.2km Thanet Coast and Sandwich Bay area

It is understood that any development proposals could mitigate such impacts through the financial contributions. The recent planning appeal at Popes Lane agreed S106 contributions to mitigate against such effects and as such, it is understood a similar approach could be adopted here.

Other matters

In terms of other matters relating to suitability, the following matters are relevant:

- The site is not subject to any ecological/environmental constraints by way of policy or other designation;
- The owner is not aware of any contamination on the site that might hinder development;
- It lies in Flood Risk Zone 1, and is therefore the preferred location for development in flood risk terms;
- The proposals will incorporate landscape buffering which will protect the listed buildings at Sweech Farm – located circa 75m from the boundary.
- Although matters of transport will be considered at a later date, the site can be accessed directly from Herne Bay Road unlike the Popes Lane proposals which were recently dismissed at appeal.

- The site is ideally located near to existing services and facilities which promote sustainable living activities such as, reducing the need to use a private car.

SUMMARY

The foregoing commentary confirms that the site is suitable, immediately available and achievable in terms of bringing forward residential development. The site is therefore deliverable and should be confirmed as part of the Local Authority's housing allocations in future iterations of the Local Plan.

We would be happy to discuss the site in further detail if it would assist. The client is progressing landscape and transport studies which will be completed and available for submission at the next consultation. In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part this 'Call for Sites' consultation exercise.

Yours sincerely,

Michael Birch
BSc (Hons) MSc
Planner
michael.birch@rapleys.com
07964558708



APPENDIX 6: SITE PLAN



APPENDIX 7: SWEECH FARM DESIGN PRECEDENTS

RAPLEYS

REPRESENTATIONS FOR THE DRAFT CANTERBURY DISTRICT LOCAL PLAN TO 2045
CONSULTATION – LAND ADJACENT TO MILBOROUGHS - RESIDENTIAL ALLOCATION UNDER
DRAFT POLICY R18 (LAND TO THE NORTH OF POPES LAND).

SWEECH FARM DESIGN PRECEDENTS



Site location	
Land adjacent to Milborough House Farm, Biggleswade, Bedfordshire	
Site name	
Sweech Farm - Precedent	
Site ref	1000
Site ref	1000 PM
Site ref	1000 PM OR A-01-100
https://www.rapleys.com	

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Registered office: 88 St. James's Street, London, SW1A 1NE, England. Registered in England. Registered by 1000



Project: 000000000000
Land adjacent to Milborough
House Home Bay Road Sturry
000000000000
Sweech Farm - Precedent
DATE TAKEN: 18/1/23 PM
PROJECT: 000000000000
4:00 PM DR A-01-100
ricoconk@architects