

The parish council has the following concerns/questions in no particular order:

Item/proposal:	Summary feeling:	Comments:
<p>Housing numbers proposed. There is a requirement to provide 1252 new dwellings per year – this figure is set by the government’s ‘standard methodology’ in use since 2019.</p>	<p>CONCERN We do not believe the plan to 2045 does allocate enough housing to meet the government’s housing numbers.</p>	<p>This draft Local Plan requires successes on its planned infrastructure delivery – and will still need massive housing provision to give the developer contributions amounts needed to meet this infrastructure cost. Point 6.23 and the Table in 6.4 of CCC’s Development Topic Paper (October 2022) gives a residual housing need requirement for 30,709 units – and demonstrates a figure of 30,746 over the plan period as a whole. This is a surplus of just 37 units. And this calculation already includes windfall numbers. Is this enough ‘wriggle room’ to meet housing number requirements to 2045? Despite the recent announcement that housing numbers are no longer mandatory but advisory, our understanding is that it is not as simple as it sounds – Housing numbers are set using a standard methodology – and whilst local authorities can challenge housing numbers set, they need to demonstrate non-deliverability of the targets set – for example if a council has no available land – eg if it’s already fully built up, and/or any land remaining has designations such as green gap or SSSI. This is not the case for the Canterbury district and the Inspector would challenge as CCC does have suitable and deliverable sites being put forward by landowners / agents / developers.</p>
<p>In Autumn 2023 the final draft goes to a government inspector to determine whether it is ‘sound’.</p>	<p>CONCERN The inspector may find the plan ‘unsound’ in terms of housing numbers</p>	<p>There is a concern regarding availability and deliverability of the largest strategic site allocation – Policy R1 Land at Cooting Farm, Adisham for 3,200 new homes, where the major landowner has said their land is not, and will not be made available, although CCC’s response is that there is a reasonable prospect that this will change during the lifetime of the plan. This combined with the surplus of just 37 units to meet the Local Housing Need to 2045 and the concerns about the deliverability and availability of the Cooting Farm, Adisham site we feel it is highly likely the Inspector will find the plan unsound – and advise CCC to allocate more sites for housing. The inspector could signpost/choose other sites for CCC if he/she deems necessary. CCC may also review and allocate other sites for housing in the Regulation 19 draft to the Inspector. Such sites could be chosen in haste and be unsuitable. Does CCC have a back up plan for reserve sites? Has enough work already been done?</p>
<p>Costings in the CCC Draft Infrastructure Delivery Plan (October 2022)</p>	<p>CONCERN about costs given current High inflation etc</p>	<p>The fear is that thousands of houses will get built but without the planned road infrastructure getting built, as the build costs will always be exponentially out of reach. And that it isn’t just about road infrastructure costs and viability – but the knock on effects on the amount of actual provision of affordable housing, recreation and open space facilities, etc.</p>

		With an uncertain housing market, there may well be very long delays before the new roads are operational – all the time with major new build development being built with ever-increasing congestion impacts.
Insufficient Foul drainage capacity - Southern Water only review requirements after a permission is in place, and have a five-year programme of work	MAJOR CONCERN	A Grampian condition, to phase builds to align with available Foul drainage capacity, <i>must</i> be imposed on <i>all</i> outline planning permissions, in order to phase occupancy of development to align with the delivery by Southern Water of any sewerage network reinforced required to serve that development.
High quality housing design	Statement SUPPORTED	We appreciate and welcome that water usage in new developments is tougher than the national requirements. Plus carbon-neutral elements and sustainability are key components. In terms of High quality design - How will this be achieved in reality? How do we get away from the bog standard Red Row/ Barretts stock housing design? How can we make architects/developers design new dwellings taking their architectural cues from the local and surrounding vernacular? How can local people have more of a say over this?
Low density housing	Statement broadly SUPPORTED	This varies between 18-34 dwellings per hectare. BUT with really effective design there could be less of a land grab.
Affordable Housing – builds of 10 or more units to provide 30% affordable housing	SUPPORTED	The parish council has concerns that developers may seek to reduce this on arguments of viability such as the Sturry development example CA17/01383/OUT which has 0% affordable housing.
Proposal to dispose of inner Canterbury car parks	CONCERN	The parish council understands this links to the proposed Canterbury Circulation Plan with the aim of reducing inner ring road congestion by people driving to inner car parks – but there are valid journeys and reasons for requiring short-term inner city parking, for example, for less physically-able people to do their banking or dentist visit requirements etc. Relocation/Loss of car parking in the city centre will affect shops/businesses – who will relocate elsewhere.
The Canterbury Circulation and zoning plan	CONCERN	This is radical and aspirational. It may get tremendous adverse comment from the public and be politically undeliverable. It remains a notional design until the bypass roads are built – for which there are costing and funding concerns. To work it is dependent on the expensive Eastern Movement Corridor (EMC) – costed at £163m – is this really deliverable? The EMC needs its route precisely defined now. Policy C26 Land North of the University has no strategic housing allocation yet, but could help to fund the Northern movement corridor? Without the complete bypass, other roads would take the strain.

		<p>Not everyone wants to use Park and Ride and park and ride is not always a solution for every need people have to visit inner Canterbury. To cycle or walk everywhere is just not practical for everyone, to achieve the needs for their journeys. You cannot do a weekly food shop on a bike.</p> <p>Oxford council is proposing to divide its city into six zones where residents may use their cars as much as they like within their district and given free permits allowing them to drive to other districts on 100 days a year. If they exceed this limit they will be fined, possibly £70 a journey or a day. (Source The Sunday Times October 23, 2022). A scheme of this sort may work better? The current proposed zoning models on Ghent which is a much larger city than Canterbury.</p>
<p>Lengthening of the Sturry train station platforms</p>	<p>SUGGESTION to ease traffic congestion on the A28</p>	<p>The level crossing at Sturry is closed for 17 minutes in every hour. The regular traffic congestion frequently backs up for over a mile from the crossing. The level crossing 'down time' is made worse as the Sturry station platforms are too short, causing any train of more than four carriages to experience "train overhang", so the barriers cannot be raised. The arrangement of the platforms is such that both up trains and down trains overlap the crossing. This issue is only going to get worse because of the housing developments for more than 2,500 homes at Sturry, Broad Oak and Hersden, and further afield at Herne and Greenhill. Lengthening the platforms at Sturry will give immediate and long-lasting benefit to a great deal of residents and road users, not just in the local area but from the wider towns around. It would be better for the environment, climate change and air quality.</p> <p>The Part B – Schedules of the draft Infrastructure Delivery Plan (October 2022) has Ref IA22 and IA23 for improvements to Canterbury West Station: - "lengthen and widen the platforms from 8 car to 12 car" IA22 and - "A new turnback facility or a Bay platform at Canterbury West to reduce the down time of the crossing at St Dunstan's Crossing" IA23. Both cite the funding mechanism as CIL and S106.</p> <p>The parish council would like to see inclusion of the lengthening of the Sturry station platforms with associated signalling, software, etc requirements included in both the Infrastructure Delivery Plan and as a priority on the CCC's Community Infrastructure Levy (CIL) infrastructure projects list to ensure that this has a programmed outcome for achievement.</p> <p>Would a cheaper alternative be to move the station westward (and lengthen the platform) so that both platforms are parallel to each other and reduce the barrier time? Can we all, and Parliament, push for inclusion of improvements as part of the Network Rail objective of completing the East Kent Resignalling Scheme to include the proposed re-siting of signals in the vicinity of Sturry? If this could be combined with a change to the Selective Door Opening (SDO)</p>

		arrangements, whereby passengers were enabled to board and alight from the rear 6 coaches only in both directions (as the newly located signals further along the route on the Up side would permit this), then the platform lengths could remain as they are and the level crossing would be clear of the rear stopping trains at all times.
Draft Open Space Strategy 2022 and Open Space Assessment report 2022	SUPPORTED	<p>The Vision and the Aims in the draft Open Space Strategy (to protect, enhance, promote and secure open space and new provision) are wholly supported by the parish council.</p> <p>Both the percentage provision thresholds in new developments for each typology, and the reductions to the distance standard thresholds to travel are wholly welcomed. There is a concern that a developer may play 'the viability card' and seek to reduce open space/all typology requirements – although we recognise that CCC has set the bar high.</p> <p>The parish council fully supports and applauds that: Proposals for development for more than 300 homes will be required, for the total on site open space provision, to:</p> <ol style="list-style-type: none"> <li>Obtain the relevant designation (either Village Green, Fields in Trust or Local Nature Reserve designation) for the open space from the relevant body; and</li> <li>Transfer the freehold ownership of the open space to the council (or to the Parish Council); and</li> <li>Establish an endowment fund to cover the on-going management and maintenance of the open space in perpetuity.</li> </ol>
W6 - The Park and Bus at Whitstable	SUPPORTED	<p>NOTED planning application w/c 12/12/2022 <b>CA/22/02586 – Land At Thanet Way, Whitstable (Policy W6 allocation in draft CDLP)</b></p> <p>EIA screening opinion request in relation to development of the land for the erection of up to 270 dwellings inclusive of associated infrastructure <i>including land for up to a 300 parking space park and bus facility</i>, a 500sqm local shopping and community facility with associated parking, open space (including natural and semi-natural space, amenity green space, parks and gardens, play facilities (including: fixed play areas with LAP and LEAP facilities), NEAPs and destination play facilities, outdoor sports facilities and allotments), network of new roads, surface water drainage features, car and cycle parking and associated works.</p>
Buses and Canterbury Bus Station capacity	GENERAL COMMENT	Canterbury Bus station is at or nearing capacity. To support development across the district an improvement is required. It is noted that The Part B – Schedules of the draft Infrastructure Delivery Plan (October 2022) has Ref IA19 to increase its capacity. This is supported but there is no indicative cost or timescale for delivery given.
R26 – 440ha Broad Oak reservoir and Country Park	SUPPORTED	Planning for sufficient fresh water supply is essential.
S106 Agreements	GENERAL COMMENT	<p>Section 106 Agreements need to be robust and watertight to ensure that enforcement action may be taken for any non-compliance.</p> <p>Parish council input before such agreements are finalised would be welcomed.</p>

<p>Proposed new green gap at Radfall, Chestfield</p> <p><b>The Natural Environment and Open Spaces Topic Paper 2022.</b> Page 28:</p>	<p>NOT SUPPORTED</p>	<p>The parish council feel that this proposal appears to be reactionary to the inclusion of W5 Brooklands Farm allocation rather than as a result of assessment or analysis. The parish council does not support it.</p> <p>If designated as green gap this would alienate Radfall from the main Chestfield village. It may also preclude deliverability of two more future slip roads on to the A299: The two new Eastern slip roads proposed to help mitigate Policy W5 Land at Brooklands Farm for 1,300 homes are welcomed. It would be good to go further and extend this site with additional homes in order to build a further two slip roads to completely future-proof this junction/development. It is a missed opportunity not to have both East and West access and egress.</p> <p>Is there any scope for negotiating further land and providing a further two more West-bound slip roads – realising this would need to be funded by further additional homes – but would bring benefits:</p> <ul style="list-style-type: none"> <li>i) to ‘future-proof’ the whole development</li> <li>ii) benefit the existing Chestfield village and wider region</li> <li>iii) bring cost economies of scale in both the planning and build process and disruption rather than add on at a later date, and</li> <li>iv) increase CCC’s housing numbers.</li> </ul> <p>Chestfield Parish Council will write directly to Cllr Fitter-Harding as the ward councillor and Leader of Canterbury City Council with a specific request to remove this proposal from the Regulation 19 draft to be presented to the Inspector.</p>
<p>W8 - Bodkin Farm, Chestfield</p>	<p>Generally SUPPORTED provided a school goes ahead</p>	<p>Proposal for one of two New coastal secondary school for the Coastal towns. This is a good location for a secondary school, between Whitstable and Herne Bay, with good access routes and nearby train station, although the train station is not DDA compliant.</p> <p>Allocation for Development of this site overrides the green gap designation – which is only acceptable if the secondary school happens – the site should not be allowed for development of dwellings only – refusal of CA/14/01319 for housing refers – the inspector upheld the refusal at Appeal primarily on green gap grounds.</p> <p>There is some concern about integration of this plot into the village of Chestfield – a single vehicular access onto the old Thanet Way makes this an ‘island’ layout – the only two-way connectivity is via pedestrian/cycle paths.</p> <p>There is concern that traffic modelling vehicle counts include modelling for the school – we think it does not:</p> <p>The most recent and directly relevant report is the Canterbury Local Plan Canterbury Local Plan – Preferred Strategic Growth Local Plan Option 11 October 2022 (revision 3). The model’s predicted traffic flows are shown on the maps on p45 and p46 of the October report. The westbound flow on Old</p>

		<p>Thanet Way at Bodkin Farm is 634 vehicles per hour between 8am and 9am (and 613 on the approach to Bodkin Farm). The eastbound flow isn't shown - we would expect the flow to be marked on the north side of the road and written parallel to it.</p> <p>The base flows (without the Plan developments) aren't shown.</p> <p>Subject to confirmation by CCC/KCC/Jacobs the earlier May 2021 report gives base flows (i.e. traffic levels in 2019) on the first two maps in Appendix E.</p> <p>Looking at the AM base flow map, the westbound flow on Old Thanet Way at Bodkin Farm is 608 vehicles per hour 8am – 9am, and the eastbound 455.</p> <p>Comparing the 613/634 vehicles in 2045 with the 608 in 2019 raises a question about whether they have modelled the school at Bodkin. Apart from the approximately 2000 pupils there would be 100-200 staff in a 6FE school and about 70% of these might be expected to drive to work.</p> <p>Additionally, the modelled output effectively shows an average of flows over an hour; any brief periods of High congestion within the hour may not be visible. We know that the peak hour for traffic is during school term times covering the afternoon pick up time – not early evening.</p>
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<p><b>W5 - Brooklands Farm, Chestfield</b></p> <p>Although only part of this site falls within Chestfield Parish, the parish council will make a representation at the next Local Boundary Review to extend the parish boundary to have the whole site in the parish.</p>	<p>Two new Eastern slip roads are welcomed. It would be good to go further and extend this site with additional homes in order to build a further two slip roads to completely future-proof this junction/development. It is a missed opportunity not to have both East and West access and egress.</p> <p>Is there any scope for negotiating further land and providing a further two more West-bound slip roads – realising this would need to be funded by further additional homes – but would bring benefits:</p> <ul style="list-style-type: none"> <li>i) to 'future-proof' the whole development</li> <li>ii) benefit the existing Chestfield village and wider region</li> <li>iii) bring cost economies of scale in both the planning and build process and disruption rather than add on at a later date, and</li> <li>iv) increase CCC's housing numbers.</li> </ul> <p>The proposal to have a green gap designation (<b>The Natural Environment and Open Spaces Topic Paper 2022</b>. Page 28) that would preclude the provision of two further slip roads is NOT supported. The parish council feel that this proposal appears to be reactionary to the inclusion of W5 Brooklands Farm allocation rather than as a result of assessment or analysis.</p> <p>Provision of the slip roads gives an opportunity to address flooding issues that occur at the bottom of Radfall Hill under the underpass.</p> <p>The draft CDLP states the slip roads should be delivered at an early stage of the development and in any case prior to occupation of 50% of the total dwellings. The parish council would like early/earlier delivery – we don't want construction vehicles through the village – which is essentially one road.</p> <p>A new primary school and SEND school are welcomed.</p> <p>Policy W5 states handover of the land to KCC for both schools prior to the occupation of 100 dwellings. KCC will likely outsource the build. The parish council would like more cohesion in the development of the schools alongside the housing – and don't want the land sat there in a key location – and with extra construction traffic. A school is surely a selling point for house sales.</p>
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10% of provision to be bungalows – This is welcomed by the parish council given Chestfield’s demographic and existing bungalow stock.

Self and custom built plots - Policy DS2 refers. Is there any detailed information on either of these yet? CCC has only a handful of people on the CCC self-built register. The people would buy a plot of land only. Chestfield Parish Council don’t want unkempt plots. This arrangement could compromise the development design. Self-build seems to work better where there is a bespoke development purely for that purpose.

There is tidal, fluvial and surface water outfall to contend with – dual events have caused previous issues in 2019 and 2020. The impact of the Brooklands Farm development on the rest of the village will be important to mitigate – development will create more surface water – this will be built in to surface water attenuation basins and outfalls and velocity scheme details and possibly require underground attenuation basins too. Other reinforcement works may also be required.

Chestfield Parish Council has grave concerns re Foul drainage capacity – Chestfield Parish Council will ask CCC to impose a Grampian condition in the outline application permission, that phasing/occupancy of the new dwellings must align to capacity in Southern Water’s network. The Grampian condition should mean that the potential risk of flooding to properties and/or environmental pollution can be mitigated in a timely manner. (As per some key points in Southern Water’s Briefing Note for LPAs on infrastructure provision [briefing-note-for-lpas-on-infrastructure-provision.pdf \(southernwater.co.uk\)](https://www.southernwater.co.uk/infrastructure/briefing-note-for-lpas-on-infrastructure-provision.pdf) The recommended Southern Water condition should read: *“Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development.”* )

The parish council urges CCC planning to impose a Grampian condition like this on all outline applications for larger sites in order to protect all of the existing district’s residents.

Policy clause 4. (a) (v) “New and improved walking and cycling connections to Herne Bay via A2990 Thanet Way and including the investigation of downgrading Molehill Road to a green lane;” – what is a ‘Green lane’?

NB. In CCC’s Walking and Cycling current consultation (<https://news.canterbury.gov.uk/wp-content/uploads/Local-Cycling-and-Walking-Implementation-Plan.pdf> ) there is proposal W12 - Chestfield Parish Council fully supports the scheme Reference W12 – Crab and Winkle cycle route at South Street to Greenhill via Brooklands development site, Grasmere Road and Molehill Road. The parish council would like to see this a priority to connect Chestfield residents with the Crab and Winkle. However, there are concerns about the current condition and status of Molehill Road – to link into the new developments at Greenhill – Molehill Road is narrow, has blind spots, and uneven camber – and there are national speed limit concerns on a stretch of it. Can it be improved with extra lighting, and a lowering of the speed limit in parts? Additionally, a toucan crossing may be required on Chestfield Road within this scheme? It is noted that the potential funding source is given as £500k of developer contributions – what does this extend to? i.e. is this the whole of the W12 route, or just the onsite development bit of the route?