

Draft Canterbury District Local Plan to 2045 (Regulation 18) Representations – Brooklands Farm

Executive Summary

1. Hallam Land Management (“HLM”) is promoting the Land at Brooklands Farm (“the Site”) (SLAA ref: SLAA104) which is allocated for a residential-led mixed use development at Policy W5 of the draft Local Plan.
2. HLM support the Council’s development vision and delivery approach of delivering homes in line with the identified local need using the Government’s standard method, as well as transport infrastructure and economic growth.
3. HLM fully supports the Plan’s vision in focusing growth within Whitstable and in particular the draft allocation of the Strategic Development Area (“SDA”) within South Whitstable (Policy W4) and Brooklands Farm for a comprehensive mixed-use development (Policy W5). We agree that the Site can form a logical urban extension to the existing settlement and can make a significant contribution to meeting local housing and infrastructure needs.
4. These representations set out the ways in which Policy W5 can help to fulfil the Council Strategic Objectives through protecting existing assets, housing and infrastructure delivery; thus, securing significant benefits for existing and future residents of Whitstable and Canterbury City Council through the delivery of a highly sustainable development.
5. HLM do have a number of comments on specific topics and matters related to the allocation, including the quantum of development for particular proposed uses, as well as on and off-site infrastructure delivery and design / layout.
6. Whilst the draft Local Plan is supported by a range of technical work, HLM consider that further technical evidence is required to, in particular, inform infrastructure requirements, and HLM would be delighted to work with the Council and stakeholders in this regard to deliver a sustainable and well considered development.

Introduction

7. The representations have been prepared by Nexus Planning, on behalf of Hallam Land Management (“HLM”), in response to the consultation on the Canterbury City Council Draft District Local Plan 2020 to 2045.
8. HLM is promoting the Land at Brooklands Farm (“the Site”) (SLAA ref: SLAA104), which measures 79.13ha and is located to the south of Whitstable and to the east of Chestfield and comprises draft Policy W5 in the consultation Plan. The proposals at the Site will deliver a highly sustainable development on the edge of one of the most sustainable settlements in the District.
9. HLM are undertaking more detailed survey and masterplanning work, in order to support the development of the draft allocation.
10. Draft Policy W4 identifies land to the south of Whitstable as a Strategic Development Area (SDA), focusing on new sustainable communities, key infrastructure and environmental improvements. Together with Policies W5-W7, Draft Policy W4 requires the SDA to deliver 31.84ha of publicly accessible open space; 3.24ha of publicly accessible sports facilities; approximately 1,690 new homes (30% affordable homes); minimum of 4,000sqm of business floorspace; minimum of 130 units of older persons accommodation; a new local centre; three form entry primary school; a SEND school; new connectivity; new road junctions and highways improvements; park and bus facilities; and enhancement to biodiversity and habitat.

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11. Draft Policy W5 allocates the Site, which is being promoted by HLM, for a comprehensive mixed use development, to include:
 - a. Approximately 1300 new dwellings across circa 37.01ha
 - b. Minimum of 130 units of older person accommodation;
 - c. A community hub to include a local centre, business space and mobility hub;
 - d. New 3FE primary school;
 - e. SEND school;
 - f. Local shopping and community uses; and
 - g. On-site open space.
12. HLM supports the Plan's Draft allocation of the SDA, as outlined within Policy W5; as well as the development spatial strategy in so far as identifying Whitstable as the secondary focus for development in the District (SS3(3)) having regard to the important role the coastal settlements play in the District.
13. HLM acknowledge the prospective changes to the National Planning Policy Framework ("the Framework"), which is subject to consultation, closing 2nd March 2023. The draft Plan will need to take account of any changes within the Framework that come into force and to this end HLM reserve their right to comment at a later date on such matter. We would however comment that in the context of housing need, HLM does not consider there to be any 'exceptional circumstances' that would justify the calculation of housing need other than in accordance with the Government's standard method, which is indeed the approach the Council is currently taking.

Spatial Strategy

Housing Needs

14. As demonstrated in the Housing Needs Assessment Outcomes & Methodology, the Council identify a local housing need ("LHN") of 1,120 dwellings per year for Canterbury over the 2020-2040 plan period. This is based upon the Government's Standard Method, which seeks minimum housing figures, and we are therefore satisfied this is correct at this present point in time. This will however need to be kept under review as the emerging local plan progresses to ensure it is based upon the latest available data. The Planning Practice Guidance then notes that the standard method figure can be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination in public (ID: 2a-008-20190220). We support the Council's housing delivery approach, alongside the economic growth and additional investment in local transport infrastructure, which aligns with national policy and guidance.
15. The Council have a record of failing the Housing Delivery Test with recent scores of 65% in 2021, and 87% in 2020 and 2019, demonstrating not enough new homes are being delivered in the District. This is a similar position for several other Kent councils. In order for plans to be positively prepared, and therefore 'sound', the Framework requires unmet need from neighbouring areas to be accommodated where practical. The Council's Duty to Cooperate Compliance Statement 2022 indicates that each authority is working towards their own individual housing targets and to provide in full within their own administrative area.
16. The unmet need will need to be fully considered and reviewed through the Plan period.

Policy SS3 - Development Strategy for the District

17. Paragraph 35a) of the Framework requires plans to meet the area's objectively assessed needs, as a minimum and the PPG identifies that it might be appropriate to plan for a higher housing need figure and that the Government supports ambitious authorities who want to plan for growth (ID: 2a-010-20201216).
18. The Development strategy sets an average of 1,252 new dwellings per year, which is significantly greater than the 1,120 dwellings per year LHN calculated through the Government's standard method, this is confirmed within the Council's Development Topic Paper (2022), which identifies a higher figure of 1,252 dwellings per annum on that basis of no cap being applied. This approach aligns with national policy and guidance, and we fully support the Council's approach in the context of materially exceeding the standard method minimum and this will help to support economic growth and extra investment in local infrastructure, such as transport.
19. The consultation Plan sets out the LHN, however does not set out a housing target over the Plan period, which is required for transparency, certainty on supply/trajectory and planning supporting infrastructure. To this end, we suggest reference is made to the total housing requirement as a minimum, as required within paragraphs 35a and 61 of the Framework.
20. We support the development strategy in strategic terms in so far the Whitstable area is being a focus for new development. The Council recognise the importance of promoting and progressing its coastal towns.
21. This is evidenced through the Canterbury Economic Development and Tourism Study, 2020 (EDTS), which outlines that Whitstable has significant potential to unlock and stimulate culture-led economic growth and strengthen existing economic ties with other parts of the Thames Estuary Production Corridor. In view of this, it is clear that growth is required and justified at Whitstable in order to take advantage of the District's economic potential over the plan period.
22. The Indices of Multiple Deprivation (IoMD) (2019) also confirm there are pockets of deprivation within Whitstable and other coastal and rural areas that are amongst the 20% most deprived neighbourhoods in England. In view of this, growth to support regeneration should continue to be a focus at Whitstable. The overall measurement of deprivation and the nine sub-domains of deprivation shows a worsening trend from the 2015 Indices, particularly against the 'Crime Domain' and the 'Barriers to Housing and Services' Domain. The spatial strategy can help to prevent the settlements continued decline against the IoMD domain indicators.
23. Analysis of the Office for National Statistics (ONS) mid-year estimates between 2011 and 2019 indicate that Whitstable's population growth has been meaningfully lower than the District's other sub-areas – a level less than half of the other sub-areas over the same time period. A key reason why Whitstable's population growth has been lower than the District more generally, is likely to be associated to the low level of planned growth at the settlement within previous Local Plans.
24. In 2019, 65% of the District's population was aged 16 to 64 (working age), however, only 57% of Whitstable's population was aged 16-64. Between 2011 to 2019, the District's working age population has remained broadly constant (65% of the total population), whereas the proportion of working age population at Whitstable has declined from 59% in 2011 to 57% in 2019. Conversely, it noted that the proportion of Whitstable's population aged 65+ has started to steadily increase over the same period (24% in 2011 to 28% in 2019). At the District level the proportion of population aged 65+ has increased from 19% in 2011 to 21% in 2019. The demographic structure of Whitstable is therefore becoming increasingly older.
25. In view of this, additional growth will need to be focused at Whitstable over the Local Plan period to maintain the settlement's status within the hierarchy and to prevent negative socio-demographic issues including an aging population structure and declining working age / family households. Without additional housing growth at Whitstable over the plan period the demographic trends observed over much of the past decade are expected to continue. This has the potential to result in the settlement having a gradual spiral of socioeconomic decline over the Plan period. Additional growth at Whitstable will also provide both direct and indirect localised job creation, GVA and consumer spending during both the construction and operation phases.

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26. Given the above, it is demonstrable that in order to achieve a balanced approach to growth that secures a range of economic, social and environmental benefits across the District, significant additional allocations will need to be made at Whitstable as part of the Plan.
27. This position is supported through the paragraph 6.1.7 of the Sustainability Appraisal Report, which sets out the spatial strategy has a secondary focus within the Whitstable Urban Areas, and this preferred option would have significant positive effects on housing, and employment and economic effects.
28. Furthermore, such growth at Whitstable will need to include urban extensions on greenfield sites that have the capacity to accommodate meaningful growth, green infrastructure and importantly a range of services and facilities on site. Such sites would also provide greater opportunities to accommodate the specific housing needs of Whitstable, which the Council's Housing Need Assessment ("HNA") advises is for 3-bedroom homes (paragraph E.16), noting that brownfield sites are likely to be more suitable for higher density development and therefore smaller 1- and 2-bedroom units.
29. In this context, the land promoted by HLM at Brooklands Farm, Whitstable represents a wholly logical urban extension to the settlement that could accommodate approximately 1,300 dwellings, including a significant proportion of 3-bedroom family homes, substantial green infrastructure, inclusive of a primary school and local centres that include community facilities.
30. Overall, delivering appropriate levels of growth at the coastal settlements would:
 - a. Maintain and strengthen the District's longstanding settlement hierarchy, through growth that is focused on the three key settlements of Canterbury City, Whitstable and Herne Bay.
 - b. Support and unlock the District's economic growth potential, particularly culture-led and University based potential at Canterbury City and Whitstable.
 - c. Deliver Herne Bay regeneration priorities and address pockets of regeneration through the District.
 - d. Help to deliver local transport infrastructure, including an upgrade to the A28 road, a Park and Ride at Whitstable and other public transport and active travel measures through a mixture of CIL and other developer contributions.
 - e. Deliver improved biodiversity and open space and new and improved community infrastructure throughout the District.
31. As such, the growth in Whitstable and the development strategy for the District is strongly supported.

Cooting Farm – Policy SS3 (4) / R1

32. Point 4 of Policy SS3 indicates a new Garden Community location at Cooting Farm, Adisham Road (Policy R1) which forms a major strategic area of growth in the District.
33. The deliverability and developability of the site must be questioned given the landowner has not made the site available and as reported, has contacted Officers to confirm that they do not wish for the land to come forward for development. This would fail the developable and deliverable tests as set out in the Framework.
34. Notwithstanding the availability of the site, the significant scale of development (3,200 homes) raises question marks. There is a wealth of evidence demonstrating new settlements often require significant lead-in times due to a range of factors including complicated land assembly and the need to deliver critical on-site infrastructure. As a result, they typically carry greater risk (than smaller sites or urban extensions) in terms of delivery timescales.
35. As such, we do not consider there is a reasonable prospect of this site coming forward in the Plan period. On this basis, HLM would recommend the Council, in line with its evidence base, reviews opportunities at existing

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draft allocations to maximise dwelling output and find appropriate alternative sustainable locations to address the 3,200 dwelling shortfall from the removal of Cooting Farm as an allocation, in line with the spatial strategy outlined in the draft Local Plan.

Policy SS4 – Movement and Transportation Strategy for the District

36. Part (3) of the Policy requires improvements to connectivity and public realm at the coastal towns, including provision of a park and bus facility and new A299 access at Whitstable. This requirement for new strategic infrastructure is supported by HLM in principle, which will encourage modal shift, alleviate existing journey reliability issues and helps to unlock growth and unmet potential in the area.
37. Linked to this however, Policy W5 requires the delivery of highways and transport improvements, such as the completion of the Crab & Winkle Way. We would welcome engagement with the Council to understand what they envisage for the schemes, the benefits and costings in each case.

Policy SS5 – Infrastructure Strategy for the District

38. We strongly support the need to deliver appropriate infrastructure alongside development.
39. Clearly, as shown in paragraph 3.3 of the draft Plan, there has been underinvestment in local infrastructure in Whitstable. This has negative consequences on the existing stock and capacity.
40. We support the Council's position insofar that Whitstable has excellent connectivity and links, such as HS1 and the A299, which Policy W5 has the potential opportunity to further enhance.
41. It is evident that strategic sites, such as Brooklands Farm (Policy W5) provide the best opportunities to facilitate infrastructure via CIL, delivering a strategic objective of the plan. Brooklands Farm can deliver major improvements to the area, with the opportunity to include a primary and SEND school, new local centres, public open space, improved sports facilities, drainage measures, allotments, and the potential opportunity for the east-bound highways slips to the A299 Thanet Way.

Strategic Objectives

42. The Plan sets out the District's strategic objectives. As a draft allocation, Policy W5 clearly helps to fulfil these objectives, however for the avoidance of doubt this is outlined below:
 - a. Provide high-quality housing for everyone, including affordable housing, as part of mixed, sustainable communities.
 1. The allocation of the Site through Policy W5 has the potential to deliver approximately 1,300 dwellings, with a mixed range of dwelling types, sizes and tenure, as required within the Policy.
 2. Affordable housing will be provided at a policy complaint level.
 3. The Site is located on the edge of a highly sustainable settlement and, subject to evidence showing it is required, can deliver a range of on-site services and facilities, ensuring the creation of a new sustainable community.
 - b. Ensure housing is of high-quality design, is low carbon and energy and water efficient as part of healthy communities with access to community facilities and open space.
 1. The allocation of the Site through Policy W5 can deliver high-quality, low carbon, and energy and water efficient housing in line with the relevant policies, providing the evidence is demonstrated for its requirement. Community facilities and public open space is also a significant benefit of the housing allocation noting almost half of the Site area will be given over to green infrastructure.
 - c. Create a thriving economy with a wide range of jobs, including more highly paid roles, to support increased prosperity for all throughout the district.

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1. The Site allocation (Policy W5) could provide on-site commercial and employment space, with opportunity for a variety of jobs, providing the Council demonstrate there is a need in this location; as well as a significant and long-term investment into the construction process supporting a substantial number of jobs.
 2. It will of course also provide a substantial number and range of housing types to ensure skilled people have high quality homes to live in.
- d. Support the growth and development of our universities as a centre of innovation and learning excellence, which stimulates business start-ups and generates skilled jobs.
1. The Site has the potential to include on-site primary and SEND school provision and contributions towards secondary school improvements, ensuring children receive a high quality education and are best placed to succeed should they decide to pursue courses at universities in the District.
- e. Create a transport network with a focus on low-carbon travel to improve air quality and people's health while ensuring excellent access to city and town centres on foot, cycle and by public transport including through intelligent transport systems.
1. The development of the Site will be highly sustainable through close proximity to a variety of existing services, and the inclusion of new on-site facilities. Pedestrian and cycle routes can be enhanced, if demonstrated to be necessary, and suitable connections will be delivered through the Site, thus enhancing sustainable transport measures.
- f. Take advantage of and improve our links to/from London and the Continent, while creating a local transport network which enables most residents, particularly those in the urban areas, to access their day to day needs within 15 minutes through healthy, environmentally friendly journeys.
1. The development of the Site will be highly sustainable through close proximity to a variety of existing services, and the inclusion of new on-site facilities. Pedestrian and cycle routes can be enhanced, where evidence shows it is necessary, and suitable connections will be delivered through the Site, thus enhancing sustainable transport measures.
 2. As discussed in more detail below (as in at paragraph 98-101) the scheme benefits from multiple access points and there is exiting highway capacity headroom in the network to facilitate delivery of the Site, which can be further enhanced through localised junctions improvements. The provision of the new slip roads to the A299 to the southern end of the Site, would have a significant strategic benefit enhancing movement, trip distribution and reducing the pressure on several junctions for the wider Whitstable urban area, but it should be noted the Site is not predicated on the slips coming forward. The provision of new slip roads to the A299 to the southern end of the Site, will be a significant strategic benefit enhancing movement to the Site and wider Whitstable urban area.
- g. Support the sustainable growth of our rural communities through the provision of affordable housing, community facilities and transport infrastructure while taking advantage of opportunities to grow the rural economy.
1. By locating large scale strategic growth at the key towns and cities, this ensures that proportionate growth can be located at lower tier rural settlements.
- h. Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses.
1. Development will be attractive and desirable, through design code and consultation processes, ensuring development meets the needs of the community. The Site does not include any designated heritage assets and will be sensitively designed in regard to the impacts upon the setting of heritage assets.
- i. Positively exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses while ensuring critical infrastructure is delivered at the right time to support development.

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1. Development will contribute towards the delivery of both on-site and off-site infrastructure via planning obligations. New schools, open space including new cricket ground, shops and road infrastructure (A299 slips) can be delivered, where evidenced by the Council.
- j. Create accessible vibrant town centres, maximising digital connectivity for residents, visitors and businesses to shop, stay and enjoy their leisure time.
 1. The development proposals will provide public realm and local shopping facilities, as well as significant open space for recreation and leisure. The occupants of Policy W5 will generate significant additional spend in the local area, supporting the viability of Whitstable town centre.
- k. Protect and enhance our rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities.
 1. Green Infrastructure will be provided to enhance and maintain the natural environment, whilst contributing towards Biodiversity Net Gain.
 2. Open space will be provided on-site, promoting healthy environments for play and exercise.
- l. Reduce the causes of climate change and adapt to ensure that all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.
 1. The Site will be designed, subject to urban design constraints, from the outset with masterplanning that maximises solar gain, ensuring designs to take advantage of natural daylight and careful consideration of building orientation, fenestration and alignment. Mixed-uses and green infrastructure provision through landscaping to provide active and passive heating and cooling effects, which will also create pleasant relaxation and community spaces.
 2. The Site will have a fabric-first approach to ensure construction of housing has substantial insulation, minimising air permeability and thermal bridging, and optimising the U-Values of the external fabric to enable a reduction in energy loss and minimise heating requirements. Coupled with modern technology for heating, such as Air Source Heat Pumps, this will ensure all buildings comply with Building Regulations and Future Homes Standards at the time, which at present stipulate a 75% reduction in carbon emissions than baseline. Decarbonisation of the National Grid is planned by Government, which will create further emissions reductions. Carbon sequestering strategies can also potentially be implemented across the Site to contribute to offsetting any remaining carbon emissions, which will also enhance Biodiversity Net Gain.
 3. To encourage the uptake of Electric Vehicles, all homes will have fast-smart Electric Vehicle Charging Points to comply with Building Regulations.
 4. Construction and operational waste will be managed, and the proportion sent to landfill minimised through efficient design, waste segregation, reuse, and recycling – secured through a Waste Management Plan. Sustainably sourced and managed materials will be used where possible and appropriate.
 5. The quality of groundwater and / or water courses will be protected from contaminated run-off.
 6. The Travel Plan will aim to embed sustainable travel practices into the heart of the new community and to promote and encourage travel by sustainable means of transport, such as walking, cycling and public transport, for all journey purposes. A modal shift will promote a sustainable move from travel by private car to other modes and encourage a sustainable lifestyle.
 7. Measures will be introduced to restrict water consumption to comply with Building Regulations. This can be achieved using water efficient fittings, such as delayed inlet valves and flow restrictors, and water efficient appliances, such as low flush WC's. In addition, rainwater butts fitted to appropriate roof gutter downpipes will be installed at all properties to allow for watering of garden plants without a hosepipe. To prevent easy hosepipe use, an external tap will not be fitted.
 8. The site wide strategy for Sustainable Drainage Systems (SuDS) will reduce the volume and rate of surface water run-off from the Site. The drainage strategy will employ the most appropriate storage methods, such as ponds, to attenuate flow, remove pollutants, and ensure that runoff to existing watercourses is restricted according to the existing hydrology of the Site. All SuDS elements will be sized to accommodate increased flows from potential future climate change. SuDS features will be

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designed to accommodate for multifunctional spaces, which, where appropriate, will allow for POS and Biodiversity Net Gain.

9. To assist with minimizing journeys, high speed broadband will be provided to each dwelling. This will enable residents to access online shopping/delivery services and allow them to work from home.

Whitstable

Policy W3 – Whitstable Urban Area

43. Policy W3 sets out the overarching Policy position for the Whitstable urban area. HLM support the general need to make effective use of brownfield land in sustainable locations.
44. Part 9 of the Policy stipulates – *sports and leisure facilities, including those provided alongside education provision, will be protected and enhanced. New sports facilities at Brooklands Farm strategic site will be co-located, where appropriate, to create an accessible sports hub which will be sustainably designed to combat climate change and provide social benefits.*
45. HLM accept this in principle, however, consider that there would be logic in locating the sports facility in close proximity to the existing Chestfield Cricket Club Sports facility to the north-eastern part of the Site, which is an existing and well-ran Club and is well supported by the local community. Improved sports facilities in this location could be catered for and offer the most holistic approach to sports provision.

Policy W4 – South Whitstable

46. Land to the south of Whitstable is identified as a strategic development area for the delivery of new sustainable communities, key infrastructure and environmental improvements. HLM support this Policy, as Whitstable and South Whitstable in particular is suitable for this scale of growth.
47. As set out above, the Council recognise the importance of promoting and progressing its coastal towns, and the EDTS identifies the significant potential Whitstable has to unlock and stimulate economic growth. Development and housing allocation can therefore make significant steps towards facilitating economic growth.
48. Furthermore, Whitstable’s growth has been meaningfully reduced in recent times, compared to Canterbury and Herne Bay. This is due to the low levels of planned growth in the settlement within previous Local Plans. As a result, the demographic structure of Whitstable is becoming increasingly older and socio-demographic issues increase. Therefore, the draft Local Plan has an opportunity to rebalance this trend and to maintain the settlement’s status as an urban area within the hierarchy.
49. Given the above, it is demonstrable that in order to achieve a balanced approach to growth that secures a range of economic, social and environmental benefits across the District, significant additional allocations will need to be made at Whitstable as part of any Plan.
50. Furthermore, urban extensions on greenfield sites are required at Whitstable that have the capacity to accommodate meaningful growth, green infrastructure and importantly a range of services and facilities on site. These sites would also provide greater opportunities to accommodate the specific housing needs of Whitstable, noting that brownfield sites are likely to be more suitable for higher density development and therefore smaller 1 and 2 bedroom units.
51. Taking this into account, the land being promoted by HLM at Brooklands Farm, Whitstable represents a wholly logical urban extension to the settlement that could accommodate approximately 1,300 dwellings, including a significant proportion of 3 bedroom family homes, substantial green infrastructure, a primary school, SEND and local centres that include community facilities.
52. Overall, delivering appropriate levels of growth at the coastal settlements would:

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- a. Maintain and strengthen the District’s longstanding settlement hierarchy, through growth that is focused on the three key settlements of Canterbury City, Whitstable and Herne Bay.
- b. Support and unlock the District’s economic growth potential, particularly culture-led and University based potential at Canterbury City and Whitstable.
- c. Help to deliver local transport infrastructure, including an upgrade to the A28 road, slips to the east bound A299, a Park and Ride at Whitstable and other public transport and active travel measures through a mixture of CIL and other developer contributions.
- d. Deliver improved biodiversity and open space and new and improved community infrastructure throughout the District.

53. As such, the growth in Whitstable and development strategy for the District is strongly supported.
54. The Policy W4 focuses the 4,000sqm business floorspace, with flexible workspace; the older persons accommodation; new local centre; and 3FE school and the SEND, solely on the Brooklands Farm allocation. Policy W5 will play a key role and makes a significant contribution in meeting Policy W4. As well as the delivery of this on-site infrastructure, HLM are required through Policy W5 to make contributions towards early years, primary, secondary and SEND education, plus contributions for primary healthcare and all other off-site community infrastructure. HLM consider that the financial costs and infrastructure costs should be fairly apportioned to Brooklands Farm where infrastructure is to serve a wider need.
55. The Policy requires the provision of a new east facing only junction to the A299 New Thanet Way and local highways improvement. This new junction would be delivered solely on HLMs site, with Policy W6 and W7 providing proportionate contributions to the east facing A299 junctions contained within Site W5. HLM would be keen to understand how the Council propose this contribution will be calculated.
56. HLM also seek clarity on whether development at Bodkin Farm has been factored into these calculations given that the draft IDP at paragraph 10.13 identifies that the slips unlock additional development at Bodkin Farm, as below:

10.13. Whitstable has seen more limited growth compared with Canterbury and Herne Bay under the Canterbury District Local Plan 2017, however this has also meant more limited investment in infrastructure. New Local Plan growth in Whitstable is focused where it can unlock opportunities for significant infrastructure investment, this is principally in the new strategic development area at South Whitstable. A new eastbound only on/off slip at A299 Thanet Way will be provided as part of the proposed Brooklands Farm development (Policy W5), as well as a proposed realignment to South Street. This will improve queuing and congestion at the A299/ Long Reach interchange and will provide direct access to the development. The new slip roads will also improve congestion at the Thanet Way/ Chestfield Road roundabouts, which helps unlock land at Bodkin Farm for the delivery of a new secondary school for the district (discussed in Section 11), although this site will still need to consider its impact on the highway network through a Transport Assessment and provide additional mitigation as required.

57. Land at Bodkin Farm is included as an urban area allocation (Policy W8), outside of the South Whitstable Strategic Development Area, for a mixed use development comprising a 6FE Secondary school, local shopping and community facilities, 250 dwellings and open space. HLM recommend that Bodkin Farm is incorporated into the Strategic Development Area, due to its location and intrinsically linked infrastructure, such as the fact it is reliant upon the A299 slip roads to come forward.

Land at Brooklands Farm

Policy W5 - Land at Brooklands Farm

58. We wholly support Policy W5 in general through the allocation for a comprehensive mixed use development, but make the following key observations, which we would welcome the opportunity to discuss with officers in due course prior to the publication of the next version of the Local Plan.

1. Development Mix

1(a)(ii) - Bungalows

59. HLM note the 10% requirement for bungalows, as set out in 1(a)(ii). The South Whitstable allocations will result in an addition 169 bungalows on top of the requirement to provide 130 specialist elderly persons accommodation. Bungalows are land hungry and whilst the need for DDA units is recognised, HLM question whether sufficient evidence is available to require this quantum of bungalows. It would be preferable for 5% bungalows (65 dwellings) across the Site. This will help facilitate the rebalance of the housing mix in the local area, attracting more families to Whitstable assisting the observe demographic imbalance and economic decline in recent years.
60. This is further reflected within Policy DS2, which requires proposals for more than 300 or more homes to provide a minimum of 10% of homes as older persons housing, and DS2 5.(b) requiring 10% of bungalows in schemes of more than 100 units and to be designed to prevent upwards extension or creation of loft rooms.
61. The evidence base through the Housing Needs Assessment (HNA) 2021 shows older persons housing is identified as a key issue. The HNA indicates substantial growth in Canterbury's older population is inevitable and projected to be between 14,000 and 16,850. Based on the Housing for Older People Supply Recommendations toolkit – the minimum levels of need over the plan period have identified:
- Age exclusive housing stock – 576 (max 731)
 - Specialist units – 1,732 (max 2,200)
 - Care home bed spaces 1,150 (max 1,460) – 26% with nursing.
62. The LHN separately considers the need for bungalows, due to a high level of demand (19% of the existing stock are bungalows), however demand for existing stock does not mean there is future demand or actual demand for particular products given the shortage of dwellings in the District. HLM question whether the existing stock is the most appropriate indicator of need for bungalows.

1(a)(v) - Self-Build Plots

63. Policy W5(1(a)(v) requires self and custom plots in line with Policy DS2. HLM have previously discussed this with the Council and note the legal duty to provide plots sufficient to meet needs, however the 2020-21 AMR indicates the self-build register had 22 entries on Part 1 of the register and 8 entries on Part 2 of the register in March 2020. The HNA indicates 25 individuals and 3 groups on the self-build register with a requirement for 19 additional plots.
64. The evidence therefore shows a limited number of people signed up to the self-build register and therefore there is not considered to be a need to supply self-build plots on the Site, and this is negligible compared to the local housing need.

1(b) – Older Persons Accommodation

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65. Notwithstanding the above in respect of bungalows, HLM are content with delivery of circa 130 units of older persons accommodation. However, further clarity is sought on what type of accommodation is specifically required by the Council and where it should be located. For example, would this include assisted living or care homes and could this be split into two separate hub areas? We would welcome the opportunity to discuss this further with the Council and accommodate it within our masterplanning work.

1(c) – Non-residential development

66. Policy W5(1)(c) sets out the non-residential development to be brought forward on the allocation. HLM are content in principle with the requirements, however have queries regarding the scale and form of elements, as considered below, and would like to discuss with the Council in further detail.
67. The allocation requires approximately 5.17ha of land to accommodate a community hub on the western part of the Site to contain a mix of units. At present, there is no evidence demonstrating the need for this area or how it has been calculated. HLM therefore request an opportunity to discuss this further with the Council, to better understand how it has been derived and can be sensitively designed as part of the scheme to deliver an appropriate mix of uses in a sustainable manner.
68. The allocation should deliver a local centre including commercial, local shopping and community uses. The Local Centre Survey Report (2021) indicates for designation, it must have a minimum of three units – at least one convenience store; with takeaway plus one retail unit or at least two other retail units. HLM would like to further discuss what the Council (inclusive of local engagement) expect this to look like and where it would be located on Site, given the concept masterplan proposes two locations.
69. A minimum of 4,000sqm of business space including flexible working space is to be provided. The SA confirms that the provision of employment space would meet the evidenced figure for Labour Demand in the District. However, this alone does not necessarily provide an indicator for the need, as existing Sites could be repurposed or improved to increase capacity and meet the need. The EDTS Update (2021) sets out at paragraph 4.4 that equivalent to 172,220sqm of employment space should be planned for over the Plan period to 2045, to ensure that business growth potential is not constrained by lack of supply. At paragraph 13.14 of the EDTS (2020), the report confirms that in quantitative terms, there would be more than sufficient employment space supply to accommodate additional requirements under the three future growth scenarios, as considered. Paragraph 13.17 shows that the Council will be heavily dependent on progress of key strategic sites.
70. HLM recognise the significant economic benefits that can arise from allocations, which can help to unlock underperforming business space in the Whitstable area, as well as improving connectivity. However, HLM does not consider sufficient evidence has been provided by the Council at this stage to demonstrate the requirement to deliver the scale of commercial development identified. HLM would therefore request further evidence and discussions with the Council with reference to the need for this business space to be included within the site, noting there are two large existing employment areas (John Wilson and Joseph Wilson Industrial Estates) within close proximity to the Site, that adequately provide for the local need.
71. Part (c)(ii) of the Policy W5, requires the provision of an on-site new 3 Form Entry (“FE”) primary school (3ha in size).
72. The draft Infrastructure Delivery Plan (October 2022) (“IDP”) at item IB4 Schedule B – Education also requires a new 3FE Primary School within the Site allocation (W5). The IDP indicates this is justified through the KCC School Commissioning Plan 2022-2026 and the KCC Reg 18 Representation on the Draft Plan, due to the development in the area generating the need for a new primary school and evidence showing that additional capacity will be required.
73. Previous evidence undertaken by Nexus Research has been supplied by HLM to Canterbury City Council regarding the requirement to provide the primary school (Appendix 1). This evidence outlined that based on birth rates within the District being notably lower than Kent and nationally, due to the large student population, there is no obvious capacity issue or requirement for the 3FE primary school, noting there is some surplus capacity within existing schools.

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74. Appendix 1 demonstrates that the Kent County Council Commissioning Plan (2022-2026) outlines the forecasted surplus (for the Whitstable planning group area) of between 2.5FE (c. 525 places) and 3.5FE (c. 735 places) Year R places across the Plan period and KCC are working with primary schools to manage said surplus and ensure all schools within the Whitstable planning group area remain viable.
75. Based on the KCC 'A Guide to Developer Contributions and Provision of Community Infrastructure' (2007), the evidence demonstrates the proposed development at Brooklands Farm (1,300 dwellings) would only generate 1.7FE of children (360 pupils). This quantum could be accommodated within the existing Whitstable planning group area, as there is a surplus, as confirmed in the Commissioning Plan, but HLM is content to provide an on-site primary school, if required. However, HLM would welcome the opportunity to discuss the size of the primary school and evidence associated with this, noting KCC's own guidance indicates a two form entry school to be more than appropriate to support the allocation even if capacity did not exist elsewhere.
76. HLM therefore question how the requirement for a 3FE primary school on the Site has been calculated and would request further information in this regard. Notwithstanding our own evidence, HLM is willing in principle to provide a 2FE primary school on site, however, if the need cannot be demonstrated then HLM would welcome flexibility for this land to be reconsidered for other uses such as residential, noting the necessary deletion of the Cooting Farm allocation and subsequent shortfall in housing against the local plan requirement.
77. In regard to the SEND school provision, HLM confirms it is content to provide land for the school. However, the IDP at paragraph 11.5 indicates the provision of a new SEND school is required for the regional area of Kent and not just the District, with students travelling from further afield to attend. Given this would be a significant regional benefit and infrastructure item, HLM would welcome continued discussions with Kent County Council and CCC to establish how this will be funded and delivered.
78. Part 1 (c)(v) of the Policy, also requires the developer to make proportionate land and build contributions towards early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure. HLM assume that providing land and / or on-site provision offsets the requirement for off-site contributions. HLM welcome opportunities to discuss this and how the contributions differ from the Community Infrastructure Levy with the Council.

1(d) – Open Space

79. The Policy requires specific quantum of open space in various typologies. Clearly such standards are directly linked to the overall quantum of housing that is provided on the Site, which won't be fully determined until the planning application stage. As such, it is considered that specifying the area of open space that should be provided is unnecessarily prescriptive and could result in unintended internal conflicts with policies later down the line if compliance with relevant standards is met but then the specific figure in Policy W5 isn't achieved. Accordingly, it is recommended that the policy requires open space provision in line with Policy DS24, which sets out a standard based on the population.
80. Notwithstanding the above, HLM are satisfied with the quantum of the open space against currently identified providing it is in line with Policy DS24, but as outlined earlier consider it necessary to reconsider the location of the outdoor sports facilities, focusing the sports hub around the well supported Chestfield Cricket Club, where new sports facilities can be fully investigated. This co-locating of facilities could provide the most efficient and effective offer, ensuring ease of use and long term viability, for example enabling management by a single organisation/company.

2. Design and Layout

2(d) – Community Hub

81. The Policy indicates a new mixed use community hub containing flexible outdoor space for community events. As detailed above, HLM seek for this area to be incorporated into a singular sport/community hub, which can be centred between the existing community in Whitstable and the proposed development, providing suitable access for residents to utilise this space, and the community hub park.

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2(e) – Built Environment

82. This Policy is linked to Policy DS6, in order to provide a high quality built environment.
83. Policy DS6 sets out that development not achieving lifetime net zero operational emissions will pay S106 contributions to Canterbury District Carbon Regeneration Fund. HLM would welcome further information as to the status of this fund and how the contribution is calculated.
84. DS6 also seeks to achieve a home design achieving a per capita consumption of 90 litres per person per day. HLM appreciate the issues being faced in terms of the scarcity of water during certain periods of the year but would note the low nature of this figure and would welcome information that the Council has to support the feasibility of achieving this level of usage.

2(f) - Assess Areas of Archaeological Potential and mitigate any adverse impacts on nearby heritage assets

85. The Policy requires a landscape buffer to be provided to the Grade II listed buildings and any curtilage listed buildings at Brooklands Farm to the west of the site and Rayham Farm & Barn to the north of the site. HLM has carefully considered impacts upon heritage assets in the masterplanning work carried out to date and is content that green buffers can be appropriately designed and incorporated into a scheme to avoid material impacts upon the setting of such assets.

2(g) - Mitigate any visual and landscape impacts to the countryside to the south

86. The Council's Local Landscape Designations Review and Recommendations (2021) report sets the Site within the Coastal Hinterland (C2: Chestfield Farmland Landscape Character Area) and Blean Woods Area of High Landscape Value. The Report recommends the boundary to be redrawn southwards along the New Thanet Way (A299), noting that the area (i.e. the Site) to the north of the New Thanet Way is *"of value as the rural setting to Whitstable, but is open arable farmland and does not have the same qualities as setting to the Blean Woods"*.
87. HLM support the change to the landscape boundary extent in this location. Notwithstanding this, HLM consider that this aspect of the policy would benefit from adjustment to the wording associated with mitigating visual and landscape impacts on the countryside to the south, as this should be in the context of not fettering the delivery of the allocation expressed at Policy W5.

2(h) - Mitigate any adverse noise impacts from the nearby A299

88. Whilst a detailed masterplan is yet to be prepared, HLM proposes to incorporate new woodland areas, bunding or fencing to mitigate the noise impacts on the development. The NPPF recognises that some impact is accepted, but this will need to be appropriately tested, managed and mitigated. Therefore, HLM suggests the policy in this context and refers to adopted standards or other relevant residential amenity policies.

2(j) - Provide a minerals assessment

89. This is noted by HLM. However, the Council will be aware the only minerals identified across the site as per the Canterbury City Mineral Safeguarding Areas Map relates to 'Brickearth (Other Areas) - Ashford, Canterbury, Dover, Shepway' but this is solely along and beneath the Swalecliffe Brook, Ancient Woodland and Local Wildlife Site.
90. It is demonstrable that mineral extraction would not be achieved without the complete loss of the above assets which would raise substantial ecological and arboricultural impacts. Accordingly, it is considered that the draft Local Plan policy should remove such a requirement on the basis mineral extraction would not comply with other policies contained within the plan.

3.Landscape and Green Infrastructure

3(b) – Provide 20% biodiversity net gain

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91. Policy W5, alongside Policy SS1 (Environmental strategy for the district) (4) requires development across the District to incorporate measures to deliver a minimum 20% biodiversity net gain, which shall be in line with Policy DS21 (Supporting biodiversity recovery).
92. We support the principle and sentiment of Policy W5, SS1 and DS21 seeking to improve biodiversity improvements in developments and creating sustainable and more efficient places is acknowledged. However, this far exceeds the 10% requirement of the Environment Act 2021, which is expected to come into force later in 2023. In proposing the 10% requirement the Government considered evidence and discounted proposing, amongst other things, a 20% net gain requirement. In view of this, compelling local evidence must therefore be presented to justify a 20% net gain.
93. Nevertheless, as the Environment Act 2021 is due to come into effect, we would also question the need for any net gain target within the Policy, given the provisions within the Act are a legal requirement.
94. As such, further clarity is required through the submission Plan.

3(i) Preserve and enhance long distance views including towards Blean Woods and the countryside to the south

95. The Council's Local Landscape Designations Review and Recommendations (2021) has recommended the boundary is redrawn southwards to align with the New Thanet Way (A299), which is an urban influence on the area. As above, HLM support the change to the landscape boundary extent as it is clear that it is no longer appropriate to retain the Blean Woods local landscape designation as it is currently drawn, and local designations are required to be informed by up to date evidence.
96. Whilst there would be some change, the impact on the landscape is not considered to be significant beyond the unavoidable loss of greenfield land, noting it will no longer be a locally designated landscape. HLM consider that change to the long distance views towards Blean Woods and the countryside is unavoidable. Therefore, this aspect of the policy would benefit from adjustment to the wording associated with mitigating visual and landscape impacts on the countryside to the south, as this should be in the context of not fettering the delivery of the allocation expressed at Policy W5.
97. HLM welcome opportunities to discuss the wording of the Policy with the Council.

4. Access and transportation

98. This Policy sets out a number of on and off-site items to be delivered as part of the SDA, including pedestrian and cycle connectivity; public transport facilities; east facing junctions / vehicle slips on the A299 Thanet Way.
99. Specifically in regard to the highways slips, HLM have been liaising with KCC Highways, which has included commissioning a traffic modelling exercise utilising the KCC Strategic Traffic Model, whereby we have established there is existing highway capacity within the network and the Site would be deliverable via some localised highway/junction improvements. The modelling included a review of the 'Level of Service' (which is an indication of capacity headroom), finding that the Level of Service remains largely unchanged following the inclusion of the slips. This demonstrates that any existing issues are due to the existing highway capacity rather than new vehicular movements specifically generated by the development at Brooklands Farm, as demonstrated within the modelling reports produced by Jacobs to support the emerging draft Local Plan. The Level of Service at junctions throughout the surrounding area would not be significantly impacted by vehicular movements from Brooklands Farm. Modelling undertaken by HLM's Transport Consultants show that there is some benefit to Brooklands Farm (following the delivery of the slips), however there is no evidence to demonstrate that the development is predicated on the slips and junction improvements. Therefore, development of the Site could be acceptable without the slips being delivered. The provision of the new east bound slips is therefore a wider Whitstable piece of strategic infrastructure that can be a strategic benefit, enhancing movement, trip distribution and reducing the pressure on several junctions (such as the existing east bound off-slip at Whitstable and Clapham Hill / Borstal Hill roundabouts) for the wider Whitstable urban area. Whilst HLM is content to work with the Council and facilitate the delivery of the slips, we would seek to discuss the above with the Highway Authority and funding mechanisms.

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100. In addition, HLM note that a range of pedestrian / cycle improvements are identified for the allocation to provide but that a number of schemes appear to offer wider benefits for new and existing communities in the general Whitstable area and are not directly or solely related to Policy W5 allocation.
101. Overall, HLM would welcome engagement with the Council to understand what they envisage for the various schemes, the benefits, potential land ownership constraints, costings in each case and to confirm which other developments will make contributions, where appropriate.

5. Phasing and delivery

5(b) The local centre including commercial and community space, must be delivered prior to occupation of 25% of the total dwellings

102. The Allocation concept masterplan envisages two community hubs that are likely to be delivered in two separate phases. HLM would therefore welcome clarity as to which local centre is required to be delivered by this trigger and whilst the phasing strategy is yet to be developed, it is likely that the second hub would come at a later date noting the concept masterplan in the Draft Local Plan requires in each half of the allocation.
103. Noting the above, it may be prudent for the policy wording to simply relate to the 'first' hub.

5(c) The business space should be provided as fully serviced land prior to the occupation of 50% of the total dwellings together with a robust delivery strategy

104. As referred to under 1(c) – Non-residential development, above, HLM consider it is presently unclear what the Council's expectation is for the proposed the business space and whether this need is required. HLM would welcome conversations with the Council on whether the Site is the most logical and viable location for the provision of 4,000sqm of employment space and whether this quantum is required.

5(d) To transfer the primary school and SEND school sites to KCC at 'nil consideration', prior to the occupation of 100 dwellings

105. HLM are satisfied with transferring the primary school site to KCC for education at a 'nil' provision, but it is noted that the land comes with a significant value which HLM would request is considered in the context of the overall infrastructure package. In regard to the SEND School provision, as this is a significant regional infrastructure item, HLM consider that appropriate funding should be given by the relevant authorities and a value prescribed to the land too.
106. We would also welcome the opportunity to discuss with the Council timescales for any return of land, should it no longer be required, so that other development requirements can be met

Strategic Land Availability Assessment (SLAA)

107. The Site was assessed through the Council's Strategic Land Availability Assessment (July 2022) following the Call for Sites submission. The Site's SLAA reference is SLAA104.
108. HLM generally support the methodology and criteria of the SLAA and it is in line with general good practice. We support the general conclusions of the SLAA in reference to SLAA104, which further demonstrate and conclude that the Site is located in a sustainable location within the District, with excellent access to key services; strategic services; and additional services. The Site has been rightfully allocated in the Plan accordingly. Notwithstanding this, when considering the facilities within a 15 minute walking time, the SLAA does not consider a number of facilities that HLM consider are closer than perceived by the Council. For example, the Tesco Extra Superstore, the Crab and Winkle Way, the Joseph Wilson Industrial Estate, Chestfield Cricket Club, Chestfield Golf Club and existing recreation grounds, to name a few, are all within 15 minute walk from the Site.

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109. The SLAA considers the proposed use of the Site to be mixed, with market, affordable and older persons housing; commercial; community facilities; and sports and leisure. These are significant benefits for inclusion of the Site as an allocation.
110. The SLAA identifies the Site is within the following designations - Flood Zone 2, Flood Zone 3, Ancient Woodland, Natural Habitat, all covering small sections through the centre of the Site, and the Convicts Wood Local Wildlife Site running north-south to the centre.
111. The SLAA states that Convicts Wood LWS runs through the centre of the Site, from north-south. The DEFRA Magic Maps confirms this to be true but this area would be protected through the redevelopment and would be retained amongst the open space, as a natural feature, and therefore does not form a constraint to development.
112. HLM agrees with the SLAA in respect of the Agricultural Land Classification Grade and confirm that the Site is classified within Grade 3 / 4, but also partially Urban, as confirmed in the DEFRA Spatial Map.
113. The SLAA identifies that Brooklands Farm is within a Minerals Area, with a small central section covered by KCC Minerals Safeguarding as Brickearth Other Areas. As set out above, this is solely along and beneath the Swalecliffe Brook, Ancient Woodland and Local Wildlife Site, which makes it unviable to obtain.
114. The SLAA indicates that the Site is likely to achieve access from South Street / Chestfield Road. HLM confirm the Site is not landlocked and HLM has control over the land and there are no third-party restrictions on access.
115. HLM accept that new highway/footway/cycleway improvements would be required as part of the development and should be proportionate to the scheme. Further highways comments are discussed above.
116. In respect of heritage, the Chestfield Conservation Area is located to the north-east of the Site and there are Grade II Listed Buildings in close proximity to the Site (Brooklands Cottage / Brooklands Farmhouse to the south-east and Barn to the Northeast of Rayham Farm and Rayham Farm to the north). HLM agree with the SLAA conclusions that the Site could be sympathetically designed to ensure the heritage assets are preserved.
117. The SLAA identifies the Site is characterised by a Townscape *'to the western part of the site is surrounded by residential development and neighbours with the business park and is of more urban character'*. In terms of landscape, *'the eastern part of the site is a rural character with countryside lanes bounding the site. The stream and LWS naturally divide the site in two parts - western and eastern. Given the size of the site it's considered that there would be opportunity to provide open space and landscape buffers to mitigate some of the impact on the landscape.'*
118. The SLAA confirms the Site is located within the Landscape Character Area C2: Chestfield Farmland. However, the Local Landscape Designations Review and Recommendations (2021) report sets the Site within the Coastal Hinterland (C2: Chestfield Farmland Landscape Character Area) and Blean Woods Area of High Landscape Value. The Report recommends the boundary to be redrawn southwards along the New Thanet Way (A299), noting that the area (i.e. the Site) to the north of the New Thanet Way is *"of value as the rural setting to Whitstable, but is open arable farmland and does not have the same qualities as setting to the Blean Woods"*.
119. We support this change and approach, as it is clear that it is no longer appropriate to retain the Blean Woods local landscape designation as it is currently drawn, and local designations are required to be informed by up to date evidence.
120. HLM agree that a small part of the Site is covered by Ancient Woodland, Priority Habitat and Local Wildlife Site (these are grouped together and broadly defined as Convicts Wood). The emerging masterplan we have prepared has taken these constraints into account and ensures that the policy development requirement can be met, whilst protecting valuable features. Full ecology considerations, including protected species, would be dealt with at the application stage, however HLM will prepare detailed survey work in the run up to the Local Plan examination in order to support the soundness of the allocation.

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121. HLM agree with the SLAA that the design of the scheme could address residential amenities of neighbouring occupiers, indeed the emerging masterplan ensures suitable buffers to existing residential development.
122. The SLAA states the Site is within close proximity to the A299 Thanet Way and therefore a noise assessment would be required. This is linked to Policy W5 2.(h) requiring mitigation of any noise impacts from the A299. This is discussed further below.
123. Based on the above, HLM consider, in line with the SLAA, that the Site is technically suitable for development. Any constraints can be suitably designed into the masterplan and managed.
124. The SLAA also confirms the Site is suitable from a policy perspective, is available and is achievable. HLM fully support this position. The SLAA indicates that the Site is within multiple ownerships. However, HLM confirm this is not the case and it is within a single ownership.
125. HLM maintain the Site could yield 1,400+ dwellings. Further discussion can be found below regarding the level of education provision, and the additional 1ha. of land could be utilised for increased housing delivery.
126. The SLAA estimates the housing yield at 1,392 dwellings based on a developable area of 54% having regard to the site constraints and necessary infrastructure, and an average density of 35dph across the Site. However, the Plan identifies an allocation through Policy W5 for 1,300 dwellings, thus below the SLAA identified yield albeit we note that 130 units of old accommodation is also expected to be delivered, which we support in general terms. HLM does however consider that further potential land could be available for housing once proportionate on-site infrastructure provision is agreed.

Sustainability Appraisal

127. The Sustainability Appraisal (“SA”) at Appendix G identifies the Site alongside SLAA132 and SLAA172 as part of the South Whitstable strategic development area. HLM accept that any impacts of the scheme can be designed and mitigated, as demonstrated in the SA.
128. HLM has considered the overall scoring for the Site and whilst full regard is had to Appendix M – Definitions of Significance, it is considered that it should be scored more favourably. HLM agree with the scores for SAO 1 (Air Quality), SAO10 (Dwellings), SAO 11 (Land Use) and SAO 12 (Employment). Where we disagree, this is outlined below.

	SAO 1: Air Quality	SAO 3: Biodiversity	SAO 4: Geology	SAO 5: Landscape	SAO 6: Water	SAO 7: Flood Zone	SAO 9: Heritage	SAO10: Dwellings	SAO 11: Land use	SAO 12: Employment	SAO 13: Transport	SAO14: Sustainable communities
CCC SA Score	0	-	-	-	-	-	-	++	-	++/?	++/-	++/-
HLM SA Score	0	0	0	0	0	0	0	++	-	++	+++	+++

SAO 3: Biodiversity

129. The SA sets out significant negative effects on biodiversity, geology, landscape, water, historic environment (likely impact on the assets and their setting) and land use. At this stage of the process, the effect on biodiversity

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cannot be determined, and HLM disagree that there would be significant negative effects, given that the design and mitigation could address the biodiversity and historic environment issues, with the SLAA confirming this. The definitions for significance scores within the SA are set out from Appendix M and in respect of biodiversity, a negative score is given if a biodiversity net loss is delivered. However, this is not the case here. Indeed, Policies SS1(5) and DS21 of the draft Local Plan requires a 20% net gain in biodiversity and 20% tree canopy across the Site. As such, HLM recommend this the SA score is revised to Neutral, but has the potential to become positive.

SAO 4: Geology

130. The Council have not commented upon the reason for scoring geology as significant negative. As set out above, the recognised minerals on Site are solely along and beneath the Swalecliffe Brook, Ancient Woodland and Local Wildlife Site, which makes it unviable to obtain. As such, HLM recommend this is revised to Neutral impacts.

SAO 5: Landscape

131. In regard to landscape, the Local Landscape Designations Review and Recommendations (2021) report sets the Site within the Coastal Hinterland (C2: Chestfield Farmland Landscape Character Area) and Blean Woods Area of High Landscape Value. The Report recommends the boundary to be redrawn southwards along the New Thanet Way (A299), noting that the area (i.e. the Site) to the north of the New Thanet Way is *“of value as the rural setting to Whitstable, but is open arable farmland and does not have the same qualities as setting to the Blean Woods”*. As such, whilst there would be some change, the impact on the landscape is not considered to be significant beyond the unavoidable loss of greenfield land, noting it will no longer be a locally designated landscape and that part of the District are covered by an Area of Outstanding Natural Beauty. Therefore, this Site is of much lower environmental value compared to reasonable alternatives.
132. As such HLM consider the landscape effects should be revised to Neutral.

SAO 6: Water

133. The Council have not commented upon the reason for scoring water as significant negative. Without any evidence it is not possible to compare, however, whilst there would be an increase in water consumption, the developer will make provisions to secure sustainable water measures and SuDS through the development, thus protecting and enhancing ground and surface water quality and promoting the sustainable and efficient use of water resources. This would align with the SAO. As such, HLM consider the water effect to be Neutral at worst.

SAO 7: Flood Zone

134. The Council have not commented upon the reason for scoring geology, landscape, water and flood zone as significant negative. Part of the Site is located within the flood zones 2 & 3, however development can easily and will need to be accommodated away from the flood risk areas to ensure residents are safe and in respect of good design. These areas can be retained as public open space. Whilst there are risks of flooding on the Site, the Council have overestimated the perceived effect, and it is suggested this is changed to neutral.

SAO8: Heritage

135. In regard to heritage, there are no heritage assets on the Site. To score significant adverse, Appendix M states the policy would – lead to deterioration of a World Heritage Site; lead to deterioration of the sites, areas and features of historic, cultural archaeological, and architectural interest with national designation or result in the destruction of heritage assets (national or local); permanently restrict access to historical/cultural/archaeological/architectural buildings/spaces/places; or would result in an asset being placed on the At Risk Register.
136. There are adjacent historic assets, and a suitable design response will be required. Brooklands Cottage and Farm (Grade II) to the south of the Site, has limited visual connection due screening afforded by existing agricultural buildings in the immediate vicinity. In respect of Rayham Farm and Barn (Grade II), to the north, there are

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limited views to and from the Site due to existing tall, hedged boundaries. As per the draft Policy W5 (2)(f), the Masterplan recommends keeping views open and set back from boundaries to avoid conflict with these heritage assets. The Chestfield Conservation Area lies to the east of the Site, but has limited intervisibility with the Site and there would be no material impacts on archaeology or heritage assets. As such, this clearly would not result in significant negative effects and HLM recommend is revised to Neutral.

SAO10: Dwellings

137. The SA identifies significant positive effects for housing and employment. It should be recognised that housing benefits would be in respect of market and affordable at a policy compliant level.

SAO 13: Transport

138. The SA identifies the importance of these sites (that make up Policy W4) for delivering opportunities for strategic level benefits, such as, new and improved connectivity with the A299, a new Park and Bus service for Whitstable, and enhancements and extension to the Crab and Winkle Way walking / cycling route. This position and attribution of significance is supported, and further consideration is given to these off-site highways, cycle and pedestrian works above.
139. The SA scores mixed impacts on transport – with significant positive effects on access to public transport and significant negative effects on transport highway. However, this negative fails to consider the potential significant positive transport improvements forthcoming as part of the scheme, such as the A299 slips, which can benefit the Site and the wider Whitstable area in terms of easier access and connectivity to the strategic highway network, alleviating the highway capacity at other junctions within the Whitstable area and improving journey reliability. This would be above the level of significant negative, as defined in Appendix M of the SA which sets out the definitions of significance.

SAO14: Sustainable communities

140. Mixed impacts are also found for sustainable communities, with significant positive effects on provision / loss of facilities, minor positive effects on access to GP / open space and access to education, and minor negative effects on neighbouring uses (A299). As required within Policy W5, the development of the SDA will provide onsite community facilities, such as schools, local shopping and community uses, sports facilities, play areas and open space, and contributes to healthcare infrastructure; whilst on-site mitigation can address any negative effects of the close proximity to the A299. HLM therefore dispute that this would score mixed, given the positive aspects fully outweigh the minor negative matter (i.e. close proximity to the A299). Based upon the allocation requirements of Policy W5, HLM consider that the inclusion of the primary and SEND schools would result in significant positive impacts of the development, not just locally but across the District and Kent as a whole, as the new SEND school is a key strategic infrastructure recognised within the Plan and IDP. The IDP states at paragraph 11.5 that many pupils travel considerable distances out of the District to access education, with all existing capacity within KCC's SEND provision exceeded for the District and further afield.
141. Clearly owing to the identified need, HLM consider that a greater weighted benefit than 'minor positive' should be scored for access to education. HLM therefore suggest the effect here should be significant positive.

Summary

142. In light of this revised scoring, HLM request the Council review these matters and align the scoring with HLMs assessment. In this scenario the Site would score even better, reinforcing its appropriateness as an allocation in the draft Local Plan.

Other Relevant Policy

SS2(8) - Masterplan and Design Codes

143. Policy SS2(8) requires developers of more than 300 dwellings to require a masterplan to be prepared in collaboration with the local community and subject to a design review process. Whilst Design Codes are required by way of condition for multi-phased developments.
144. HLM support this in principle to ensure coordinated and high quality design being achieved on allocated sites.
145. HLM however seek further clarity on whether the concept masterplan shown in Policies are therefore necessary, as this could be overly prescriptive and restrictive to the future masterplanning exercises.

DS21 – Supporting Biodiversity Recovery

146. HLM support the sentiment regarding Policy DS21, which requires development of over 300 dwellings to provide a minimum tree coverage of 20%. However, HLM wish to see whether the Council have identified how this will be achieved, and the knock on impacts for density, layout, usable public and private open space. Furthermore, the policy wording is unclear and lacks evidence, with the Canterbury Tree and Woodland Strategy Consultation document lacking a definitive stance on this requirement, moreover the viability appraisal does not show evidence to show this is feasible. One essential area missing clarity is how the tree coverage is calculated, such as whether existing trees can be included and at what point the tree canopy is measured.
147. Furthermore, we welcome discussions with the Council on how the tree coverage is calculated, such as whether existing trees can be included.

Infrastructure Delivery Programme

148. HLM welcome further opportunities to discuss the items in the IDP with the Council, such as the evidence base and how the Council anticipate the associated infrastructure to be designed, financed and delivered.

Summary

149. HLM support the allocation of Policy W5 within the draft Local Plan and would welcome further discussions with the Council to discuss the details of allocation following the conclusion of the Regulation 18 consultation period.

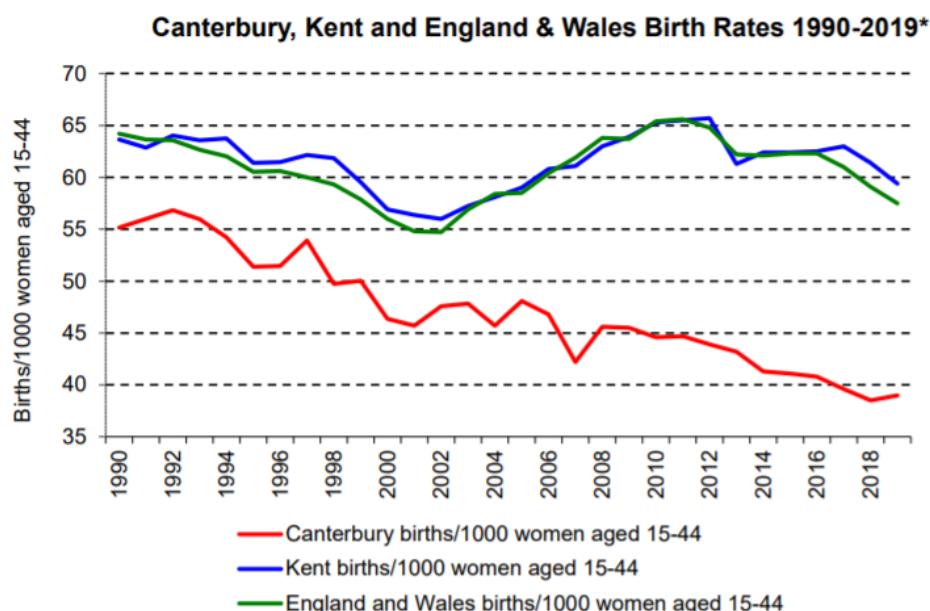
Appendices

Appendix 1 - Whitstable Education Capacity Review

Whitstable, Canterbury

Education Capacity

1. The Kent County Council (KCC) Commissioning Plan for Education Provision in Kent 2022-2026 (“the Commissioning Plan”) sets out the Education Authorities five-year rolling plan on the need for, and delivery of, new school places in Kent.
2. With regard to Canterbury District, the Commissioning Plan notes that birth rates within the district are notably lower than Kent and nationally, principally reflecting the large student population. This is illustrated within the graphic below taken from the Commissioning Plan:



Primary School Provision

3. KCC forecasts surplus primary school places across Canterbury District over the next five years, and throughout the adopted Canterbury Local Plan period up to 2031 (based on delivery of 16,000 new homes in the Plan period (925 dwellings per annum)). In 2025/26 there is forecast primary school place capacity of c. 1,598 places (equivalent to 7.6 Forms of Entry (FE)).
4. Within the Whitstable planning group area (one of the seven primary school planning group areas within Canterbury District), the Commissioning Plan outlines that there is a forecast surplus of between 2.5FE (c. 525 places) and 3.5FE (c. 735 places) Year R places across the Plan period (up to 2031). KCC are working with the respective primary schools on managing this surplus to ensure all schools within the Whitstable Planning Group area remain viable.

Secondary School Provision

5. There are three secondary school planning group areas relevant to Canterbury District. Two planning groups are Non-Selective (Canterbury City and Canterbury Coastal), one Selective (Canterbury and Faversham Selective). Selective representing the Grammar School system within Kent County.
6. Within Canterbury District, KCC forecast surplus capacity for Non-Selective secondary school places, but pressures for Selective places throughout the period up to 2031.
7. Whitstable is located within both the Canterbury Coastal Non-Selective planning group area and also the wider Canterbury and Faversham Selective planning group area. Within the Canterbury Coastal area there is expected to be a Year 7 deficit of 31 places within the 2023/24 academic year. However, by the 2027/28 academic year there is forecast to be a surplus of 53 places. This is broadly attributed to the District's declining birth rate trend. It is also noted that feasibility work is also underway to explore the future expansion of Herne Bay High by 1.5FE towards the end of the Plan period (2029+).
8. In addition to the Canterbury Coastal surplus, KCC also forecasts there to be c. 108 surplus secondary school places within the Canterbury City Non-Selective area in 2022/23 academic year; with broadly the same surplus (c. 106 places) in 2027/28 academic year. Overall, within the District there is existing and forecast secondary school capacity for Non-Selective places.
9. Whilst there is a district surplus of Non-Selective secondary school places, the Commissioning Plan forecasts pressure for Selective places of between -9 and -50 places over the Plan period (up to 2031). However, feasibility work is being undertaken to explore expanding Queen Elizabeth Grammar school or through temporary places across a number of Selective schools within the planning area.
10. Although there is an existing and forecast deficit for Selective secondary school places there remains to be overall secondary school place surplus (current and forecast) within Canterbury District to ensure that KCC meets its statutory duty of ensuring there is sufficient secondary school places.

Proposed Development Arising Needs

11. Based on the KCC 'A Guide to Developer Contributions and Provision of Community Infrastructure' (2007) a development comprising c. 1,300 dwellings would generate the following pupils:

Education Facility	Pupils	FE
Early Years (3-4 years old)	117	N/A
Primary (5-11 years old)	364	1.73
Secondary (12-18 years old)	260	1.73

Pre-School / Nursery Provision

12. The Commissioning Plan does not provide any analysis of early years (pre-school / nursery) capacity within Canterbury District, but does confirm that with the exception of Gravesham, there is sufficient headroom across the County.
13. As outlined above, a development comprising c. 1,300 dwellings would generate needs for c. 117 early years places. Although there is likely to be sufficient capacity within the local area, should an on-site

solution be ultimately required to meet this need (in full or in part) then such a need could potentially be accommodated within any local centre community building provided or as a standalone pre-school facility.

Primary School Provision

14. With regards to primary school provision, the 1.7FE of needs arising from a development comprising 1,300 dwellings could potentially be accommodated within the existing Whitstable planning group area headroom, as the Commissioning Plan states there is forecast surplus of between 2.5 and 3.5FE. This being the case, a new on-site primary school would not be required. However, we would recommend engaging with KCC's education team early in the masterplanning process to confirm position.

Secondary School Provision

15. Similarly, there is also likely to be sufficient secondary school capacity to meet the needs arising from a development comprising c. 1,300 dwellings. A development of this scale is expected to generate a total of 260 pupils (52 per year group i.e. the development would generate need for 52 Y7 places).
16. If a planning application for such as development was submitted now, first completions could potentially be achieved in the 2025/26 academic year, by which time KCC forecast there to be c. 48 surplus Year 7 Non-Selective secondary school places. Within the following academic year (2027/28), KCC forecast 53 surplus Year 7 Non-Selective places within the Canterbury Coastal planning area. In view of this, the build-out rate of any proposed development will potentially align with the quantum of surplus Non-Selective secondary school places within the planning area.
17. However this would assume that there are no other housing commitments within the planning area that would also utilise any surplus secondary school places within Canterbury Coastal planning area. However, the Commissioning Plan confirms that feasibility work is being undertaken to expand Herne Bay High by 1.5FE (225 places or 45 Y7 places). Furthermore there is meaningful existing and forecast surplus Non-Selective secondary school places within the Canterbury City planning area that could potentially be drawn upon.
18. Whilst the Commissioning Plan indicates that there is likely to be sufficient secondary school capacity to accommodate a development comprising c. 1,300 dwellings we would also recommend engaging with KCC's education team to discuss and confirm this position.

Further Education Provision

19. There is no developer requirement to meet or support the provision of further education provision as these are private-sector institutions. However, with an increasing number of Further Education students choosing to 'live at home', Whitstable is well located to the University of Kent and other commutable universities within Kent, London and the South East.

Post-Pandemic Demographics

20. There has been much speculation within the press that the Covid-19 pandemic has led to a demographic shift away from urban locations, such as London, to more suburban and rural locations. However, much of the analysis within the media has been based on house sale / rental transactions and property search engine hit data for properties by location. Our interpretation of this analysis suggests

that whilst demand increased in rural and suburban location during the early months of the pandemic, this has not necessarily continued. Indeed rental prices within urban locations has now largely rebounded to pre-pandemic levels.

21. Unfortunately, robust data on demographic change over the pandemic period will not be available until the autumn 2022 and will then only cover the first year of the pandemic (2020/21). Over the course of the months and years ahead, we will continue to monitor how the pandemic has influenced demographic change and the housing market.

Summary

22. Overall, KCC's Commissioning Plan for Education Provision in Kent covering the period 2022 to 2026 outlines that there is an existing and forecast surplus of primary school places. Indeed, within the Whitstable area, the Education Authority is working with the respective schools to ensure they remain viable.
23. Whilst there is a forecast deficit for both Non-Selective and Selective secondary school places within the 2022/23 academic year, the forecast shifts to a 141 Year 7 place surplus in the 2027/28 academic year.
24. Based on KCC's pupil product ratio's the education needs arising from a development comprising 1,300 dwellings are likely to be accommodated without the need for new on-site provision. However, we would recommend engaging with KCC's education team at an early stage of the masterplanning and planning process to confirm this position.