

12 January 2023

Delivered by email

Canterbury City Council
Military Road
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Ref: BELR3006

Dear Sir / Madam

CANTERBURY DISTRICT LOCAL PLAN TO 2045 – REPRESENTATIONS ON BEHALF OF BELLWAY

We write on behalf of our client, Bellway, to submit representations on the draft Canterbury District Local Plan to 2045 which has been published for consultation. As the Council will be aware, Bellway has a longstanding interest in, and has previously promoted to the call for sites exercise and Local Plan consultations, land south of Staines Hill, Sturry for residential development.

This site has been identified by the Council under reference SLAA023 for the purposes of the Strategic Land Availability Assessment mapping (although the site does not appear to have been considered through that assessment). The site extends to approximately 15.75 hectares.

Accommodating around 150 dwellings would require around half of the site area and provide opportunities for extensive open space with the opportunities for formal foot/cycle links through to the existing PROWs surrounding the site.

In the Natural Environment and Open Space Topic Paper (October 2022), the conclusion is reached that the “Green gap is to be retained with the existing building to the east removed inline with the previous consultation”. We have seen the ‘Green Gaps and Local Green Space Review’ (April 2021) published in relation to the draft Local Plan. This document purports to undertake a review of the Gap, and in the case of the Sturry-Westbere Gap, the conclusion is to “Retain existing green gap, but amend boundary to exclude the building to the east”.

This site is located within the Green Gap between Sturry and Westbere, however Bellway’s position is that the site plays no role in maintaining the actual, physical or perceived separation of those settlements and therefore no role in the Gap. We note that paragraph 5.46 of the draft Local Plan states that “*Designated green gaps which prevent coalescence between settlements will be protected from development which would harm the openness of these areas.*”

It is of course worth noting that the current Local Plan Policy OS6 explains that development will be permitted within Gaps where it does not:

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- Significantly affect the open character of the Green Gap, or lead to coalescence between existing settlements;
- Result in new isolated and obtrusive development within the Green Gap.

Bellway maintains that the land south of Staines Hill, Sturry can accommodate development without resulting in the two issues set out above.

Representations

In relation to the housing requirement, Bellway strongly urges the LPA to treat this, and expressly define it in the Local Plan, as a minimum requirement. This change then ensures consistency with the NPPF. In addition, Bellway strongly urges the LPA to seek opportunities which would enable the affordable housing needs of the area to be addressed. In that regard we note that additional sources of supply, in sustainable locations such as the land promoted by Bellway provide such opportunities.

At this stage we note that the Council has not yet provided a detailed housing trajectory. However, we note that the Local Plan relies upon a number of large allocations. Whilst we await that trajectory in order to understand the degree of flexibility of supply against the requirement, we reiterate that that additional sources of supply, in sustainable locations such as the land promoted by Bellway provide such opportunities.

Bellway would be willing to engage with the LPA in order to discuss the relationship of this site to the emerging Local Plan.

Yours sincerely

Tim Burden
Director

