Statement in relation to Canterbury City Council's "Call for Sites"

Site at Patrixbourne Road recreation ground and field to the east between the recreation ground and the A2

Goddard Planning Canterbury Kent

February 2022 Ref: 4066

Site at Bridge – Statement, CCC Call for Sites (submitted February 2022)

1 INTRODUCTION

- 1.1 I ask the council to consider the inclusion of both the village recreation ground and the adjacent field to the east as protected open space in the emerging Local Plan, supported by specific policies relating to protected open space and playing fields.
- 1.2 These areas, located on the eastern side of the village, are currently proposed by Cantley Estates for significant development involving 47 houses, a site for a new village hall and a car park for 84 vehicles. Vehicle access to the 47 houses would be direct from Patrixbourne Road at a point where it is a narrow, tree lined country lane. And vehicle access to the proposed village hall and car park would be from Conyngham Lane.
- 1.3 The site of this proposed development lies within a conservation area and the Kent Downs AONB. The land is widely visible from a number of public footpaths, bridleways, roads, the village school and from housing. The proposals are broadly supported by the parish council which appears to take the view that this development is necessary to secure the future of the recreation ground which otherwise might be lost.
- 1.4 I attach the representations which I previously made in respect of those proposals contained within SLAA217.
- 1.5 As you will be aware the current Local Plan provides some protection for this site in chapter 11. Policy LB1 provides protection of the Kent Downs Area of Outstanding Natural Beauty with priority given to the conservation and enhancement of natural beauty. Major development (which the Cantley proposals are) and which conflict with the objective to conserve and enhance the AONB will not be permitted other than in exceptional circumstances where it is demonstrated to be in the public interest, the need is demonstrated and any detrimental effect is moderated or mitigated. I have written previously to the council in respect of the Cantley proposals in which I set out my consideration of their landscape and visual impact, their adverse effects upon the protected AONB countryside and the harm which they would cause both to the character and the appearance of the conservation area.
- 1.6 I am also concerned that there has been no in depth assessment as to whether or not the village needs a new and large village hall to replace the existing village hall in the High Street, and whether the size of this new village hall is

tailored to the needs of the village. Where new large village hall facilities have been provided in other villages, I understand that a considerable proportion of hall bookings is for events which attract people from beyond the settlement. Consequently, these proposals would encourage unsustainable travel by private car. And the activities taking place within the building and outside, the traffic attracted, and the comings and goings of vehicles would significantly increase noise and disturbance for those residents living nearby, transforming the current quiet ambience. There are other considerations which I believe make the Cantley proposals unacceptable. But in view of the threat of that development, I believe that this land needs to have specific protection in the emerging Local Plan.

- 1.7 I recognise that the council's Playing Pitch Strategy currently protects the Patrixbourne Road Recreation Ground. But I suggest that there needs to be further notation within the emerging Local Plan. In the 2017 Local Plan, paragraph 11.18 through to paragraph 11.37, there is no reference to the need for protected open space in the rural areas. I suggest that this is addressed in the new Local Plan. There are new and more powerful pressures for new development which directly affect the rural settlements and which in my opinion necessitate appropriate open space protection in the emerging Local Plan for some tracts of land within the rural settlements.
- 1.8 I ask you to consider these suggestions very seriously in view of the significant threat of Cantley's proposals, the apparent parish council backing for them and the possibility that the site may be included within the draft Neighbourhood Plan. The proposals would have a very significant adverse impact upon the Kent Downs AONB, the character and appearance of the conservation area, the living conditions of the occupiers of several houses in Riverside Close and because they would encourage unsustainable travel by a significant proportion of users of the proposed village hall. The need for this development has not been demonstrated. In dealing with this you may consider that the recreation ground should be designated as protected open space / local green space under a policy similar to the current Policy OS1. The field to the east could be protected with a designation under a policy similar to current Policy OS9.

Subject: SLAA217

Dear Karen,

I am aware that you are considering various sites for inclusion within the next Draft Local Plan. One of those is SLAA217 which involves part of the land at Bridge Recreation Ground together with the open field to the east of it up to the A2 Bridge bypass. Those proposals have been put forward by land owners Cantley, the developers Woodchurch and architects OSG. I attach photos of the drawings which were made available at a meeting of Bridge Parish Council last week.

I am particularly concerned that there have been extensive discussions between the parish council and the developers regarding these proposals and earlier versions. Those discussions appear to be founded on the basis that if the parish council does not agree to an appropriate quantum of development then it will lose its recreation ground. The lease for the recreation ground will expire soon. This matter is being led very strongly by the chairman of the Parish Council who firmly believes that the village will have to hand back the recreation ground to the land owners at the end of the lease unless we agree to development proposals which will secure the future continuation of the recreation ground in community use.

A number of people in the village believe that the parish council has misinterpreted its position in relation to the lease. As a result, the parish council is now seeking specialist legal advice regarding the lease.

Irrespective of the lease position, I and others have significant concerns about development on the recreation ground and field in whatever form. The current proposal involves a housing scheme of 47 homes with 12 affordable units, plus a site for a new village hall and a total of 84 car parking spaces (54 for the village hall and 30 for the school in two separate car parks). Access for the school car park and village hall would be via Conyngham Lane. The housing would be from Patrixbourne Road by the creation of a new access with bridge over the Nailbourne to the east of the health centre.

My purpose in writing is not only to raise my significant concerns about these proposals, but specifically to ask you to consider the inclusion of the recreation ground and the field between the recreation ground and the A2 bypass as an area designated in the draft Local Plan as "protected open space" or similar appropriate designation. This could either be by both areas being covered by a policy similar to the current 2017 Local Plan Policy OS9 or alternatively by differentiating between the two areas and applying something similar to Policy OS9 to the field adjacent to the A2 and the designation of the recreation ground as local green space under a policy similar to current Local Plan Policy OS1.

The current Local Plan provides some protection in chapter 11 for the areas I am referring to. Policy LB1 provides protection of the Kent Downs Area of Outstanding Natural Beauty with priority given to the conservation and enhancement of natural beauty. Major development (which the Cantley proposals are) and which conflict with the objective to conserve and enhance the AONB will not be permitted except in exceptional circumstances where it is demonstrated to be in the public interest, the need is demonstrated and any

detrimental effect is moderated or mitigated. I will deal with the issue of need later but beforehand briefly consider the impact of the proposals upon the protected AONB landscape, upon the setting of the village and its conservation area.

Character and appearance

If need is demonstrated, Policy LB1 requires it to be shown that other sites have been considered to meet that need which might have a less harmful impact upon the AONB. My concern is that need hasn't been demonstrated and even if it were, there has been no thorough identification of any other potential sites within the village which might meet that need and which would have a less harmful impact upon the AONB. But rather, these proposals are driven by the mistaken view that unless agreed to, the village will lose its recreation ground.

I won't go into great detail, but this is land well beyond the built confines of the village. It is widely visible from a number of public footpaths, bridleways and roads and dwellings. The proposals will transform both the recreation ground and the field from attractive open areas to areas of substantial built development and surface car parking. There will be a significant adverse impact not only upon the AONB landscape but also upon the setting of the village and its conservation area.

The impact is not limited to the areas proposed for built development. The proposed access to the 47 residential units from Patrixbourne Road will be in a part of that road which is narrow and has a rural character and appearance. Inevitably, mature trees on the southern boundary of that field, on the northern edge of the road, which provide for a silvan setting will need to be removed to provide visibility splays for the road to be widened and for a bridge over the watercourse. A rural lane will be suburbanised and the impact upon the character and appearance of this part of the conservation area and the AONB landscape will be significant and harmful.

At the moment the character of the road changes significantly to the east of the entrance to the Bridge Health Centre. The lane is tightly enclosed on the northern side adjacent to the proposed site by very mature trees which contribute significantly to the rural character of the lane, to the conservation area and in providing an attractive entrance to and departure point from this part of the village. The access is relatively close to the point at which the speed limit on this highway changes from the national speed limit – 60mph to 30mph. Vehicles travelling along this section are very often exceeding the 30mph speed limit as they leave the national speed limit area. And similarly when leaving the village drivers often accelerate above the 30mph. Consequently, there would be a need for substantial visibility splays in both directions, appropriate to the prevailing vehicle speeds. This will inevitably necessitate the removal of a substantial number of the mature trees. In addition, there would be the need for other highways related paraphernalia including, the widening of the road, the provision of a pedestrian footway, additional lighting, kerb stones and signage, all of which will transform, in a very harmful way, the character and appearance of this part of the lane, the AONB, the conservation area and the setting of the village.

In addition, the proposals incorporate an access road across what is now an open field. This will be the main vehicular and pedestrian access for the 47 houses proposed. It is very likely that street lighting will be required in addition to footpaths. Again, it will suburbanise and transform this part of the field.

Living Conditions

The proposals will also have a significant impact upon the living conditions of nearby residents in Riverside Close, particularly those whose properties abut or are close to the area identified for two car parks and a village hall. This area is currently part of the recreation ground. A large village hall proposal here will generate substantial vehicle movements close to residential properties, late night events, light pollution and inevitable noise and disturbance, particularly at times when residents could reasonably expect tranquility. This would transform this part of the recreation ground and have a significant and harmful impact upon the living conditions of these residents.

I am also conscious that in dealing with the need for open space in paragraphs 11.18 through to paragraph 11.37 there is no reference to the rural areas which seems to me to be an omission which should be addressed in the replacement Local Plan. With the need to meet future housing requirements, villages are likely to be the target for housing proposals and I think it would be appropriate to consider using these open space policies to protect important areas of open space within and adjacent to the rural settlements.

Flood Risk

I am also concerned that the lower part of the site adjacent to the Nailbourne and Patrixbourne Road is liable to flood risk. This may amount to a fundamental objection to the proposals. But if not, in order to overcome any flood risk, this would necessitate some elevated road and bridge over the Nailbourne and over the area at risk of flooding. This would increase the visual intrusion, adding to my concerns about the impact upon the protected landscape, the setting of the village and the conservation area.

Other Considerations

There may also be additional concerns relating to the sustainability of these proposals, the likelihood of a substantial new hall encouraging additional car-bound traffic. And with the access for 47 houses from Patrixbourne Road there would be an intensification of the use of the junction of Patrixbourne Road with the High Street with relatively poor visibility from that junction in a northerly direction. The proposals would also increase traffic flows through an already congested High Street.

Need

The proposals for affordable housing within the 47 unit scheme appear to be loosely based upon the Housing Needs Survey which was undertaken in July 2017. I note that there was only a 33% response rate. The report identified a total need for 11 affordable homes ; 5 for older households.

I attach below a link to this survey.

https://thebridgeplan.co.uk/wp-content/uploads/2019/11/Housing-Needs-Survey-Report-2017.pdf

In relation to question 7, only 12 of the total respondents said they would return if more suitable accommodation were to be available. However, bearing in mind the majority of those leaving left to attend university / college, it is likely that a very small proportion of those 12 would return to the village, but rather would likely work and live elsewhere.

Question 8 indicates strong support for a small development of affordable housing if there were a proven need for people with a genuine local connection to Bridge.

I consider that not a great deal of weight should be attached to this survey as the response rate was very low and the report is now some 4 years old. Circumstances now may be very different.

Any need for a small development of affordable housing to meet local needs could be delivered by means of a small "exception site" which could be located in a less intrusive, less harmful location.

There has been no assessment of the need for a new village hall. Even if there were a need, there has been no consideration as to whether that could be met by dual use of the existing school facilities. There is no analysis of what is required and what space is necessary. A village hall is something which should meet the needs of the village and rural community within which it is located, not to serve some wider geographical area. It is widely known that the larger village halls in the rural settlements are very often booked for parties and events by people outside the local community within which they are situated. The current village hall is small but well located in the heart of the village. It is around 150m2 in floor area. The proposals involve a village hall around four times bigger. By way of example to demonstrate how existing facilities on the recreation ground are used, I understand that the tennis club has a very small number of members who live in the village. The recreation ground itself is booked primarily by football clubs from outside the village. Cricket has not been played on the recreation ground for around 20 years. In my opinion, there is no demonstrable need for a new village hall of this size and in this location.

Conclusion

In my opinion, the proposals currently being put forward are unacceptable. The need for the proposals has not been demonstrated. There has not been a thorough identification of alternative and potentially more acceptable sites to meet any demonstrable need. The result would be a substantial development well beyond the built confines of the village, highly prominent and intrusive, which would cause significant and unacceptable impact upon the character and appearance of the conservation area, the setting of the village and upon the wider protected AONB landscape. The parish council appears to be wedded to these proposals because of concerns that unless agreed to they will lose the recreation ground. There is a very real prospect that they will be incorporated in a Neighbourhood Plan. Consequently, the threat to these areas is significant. There is therefore a strong justification for the designation of the entire recreation ground and the adjacent field to the east up to the A2 as protected open space and / or local green space subject to policies similar to current LP Policy OS9 and Policy OS1.

I look forward to your response.

Best wishes.

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