

16 January 2023

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

Dear Sir / Madam,

**SUBMISSION OF REPRESENTATIONS TO DRAFT CANTERBURY DISTRICT LOCAL PLAN TO 2045
(OCTOBER 2022) (REGULATION 18 CONSULTATION)
LAND AT THANET WAY, HERNE BAY**

We are instructed by our clients, Charles Knowles Ltd, to respond to the Canterbury District Local Plan to 2045 Regulation 18 consultation. Charles Knowles Ltd supports the Council's decision to bring forward the Draft Local Plan which will set out the framework for how the district is expected to grow up to 2045.

This representation has regard to the published Draft Canterbury District Local Plan (October 2022) and specifically set out details of Land at Thanet Way, Herne Bay, which is a site that is currently available and located within a sustainable location. These representations are also set out in the context of national and local planning policy, in particular, the tests of soundness as set out at paragraph 35 within the National Planning Policy Framework (NPPF, July 2021).

We welcome the opportunity to continue to engage and work proactively with the Council to make best use of this site and to support the Council's aims in supporting sustainable development within Herne Bay.

Land at Thanet Way, Herne Bay

The land at Thanet Way, Herne Bay, as shown within Appendix 1, is being promoted by Charles Knowles Ltd as part of these representations. The site is approximately 3.3 hectares (8.17 acres) in size and is considered to be in a suitable and sustainable location for development. The site is located within the settlement boundary of Herne Bay and is readily available for development.

The site currently comprises greenfield land and is located approximately 1.3km west of Herne Bay railway station. The site is within close proximity to the built-up residential area of Herne Bay, separated by Thanet Way (A2990) to the south and the railway line to the north. There is a household waste recycling centre to the west and a static caravan park to the east. The site

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therefore forms a logical location for development due to its proximity to the existing facilities and the surrounding built-up area.

The site is currently allocated as protected existing open space and is part-designated as a Local Wildlife Site within the adopted Local Plan; and is also located within the Thanet Coast and Sandwich Bay 7.2km Zone of Influence and the Thames, Medway & Swale Estuaries 6km Zone of Influence.

The site was previously considered as part of the Strategic Housing Land Availability Assessment (SHLAA) (published July 2022) for mixed use (housing – market, affordable & older persons, commercial and industrial uses) however was assessed as being not suitable. This was on the basis that the site partly comprises a Local Wildlife Site and it is unknown if there are any protected species within it, and that further details would be needed to inform the access onto Thanet Way. The required survey and assessment work would be required to be undertaken to assess the site in respect of ecology and highway access, with sufficient mitigation proposed for any future development proposals. Notably, an area of Open Space could be retained through the detailed design should this be assessed as necessary. In addition, it was concluded that the site is located near incompatible uses, including the waste recycling centre to the west. However, it is anticipated that this can be overcome during the detail design stage through appropriate layout and mitigation.

The site is readily available, suitable, and achievable and would make a valuable contribution towards meeting the Council's identified development needs for the next Local Plan period to 2045. It is anticipated that the site is deliverable within the early part of the plan (1–5 years) and the landowner is therefore keen to work proactively with the Council to bring forward appropriate and sustainable development in this location.

Chapter 1 – Spatial Strategy for the District

The Council's vision for the development strategy for the district, as set out within Draft Policy SS3 (Development Strategy for the District) is supported and it is appropriate that Herne Bay is considered high in the hierarchy for areas of development focus given its sustainability credentials.

It is welcomed that improvements to connectivity, including to the A229 are proposed within Draft Policy SS4 (Movement and Transportation Strategy for the District).

Chapter 4 – Herne Bay

The overall vision for Herne Bay to be a thriving town with a diverse economy is supported.

It is noted that Draft Policy HB3 (Herne Bay Urban Area) sets out that within the urban area, and outside of the town centre boundary, new developments and proposals for regeneration will be supported where they accord with the other policies within the Local Plan. The Council should acknowledge the site at Thanet Way and its associated positive potential to assist with the delivery of development within the Herne Bay area. This should be reflected within the



subsequent policies which set out the proposed urban area allocations (Draft Policies HB4 – HB10). An opportunities and constraints plan can be provided to inform any draft allocation should this be beneficial to the Council.

Chapter 6 – District Wide Strategic Policies

Draft Policy DS2 (Housing Mix) sets out that development proposals which include new housing will need to provide sustainable mixed communities including a mix of housing types and sizes to meet the needs of the community and sets out the housing mix requirements for all new market housing. It should be noted that whilst the Council have specific aspirations for housing mix, and it is encouraging that the Council have set out 'buffers' for the provision, new development sites can experience additional viability issues and therefore the provision of the housing mix requirement should be subject to viability considerations.

Similarly, the requirement for new or improved infrastructure, or appropriate contribution, being provided by developers as part of Draft Policy DC7 (Infrastructure Delivery), is acknowledged. The cost of any such works should be taken into consideration in respect of any other mitigation required as well as the density and scale of any proposed development.

As above in respect of the proposed urban area allocations, the Council should acknowledge the site at Thanet Way and its associated potential to assist with development in respect of business and employment areas. This should be reflected within the sites set out within Draft Policy DS8.

The need for proposals for development likely to have an adverse effect, either directly or indirectly, on Local wildlife sites, only being permitted where the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site is generally supported. However, it should be acknowledged that any cost for mitigation measures should be taken into consideration and all development proposals should be supported with appropriate assessments which demonstrates the biodiversity value within the site.

The need to provide biodiversity net gain and to retain trees where possible is acknowledged and generally supported as set out within Draft Policy DS21 (Supporting Biodiversity Recovery), however, the option to require biodiversity net gain above the 10% requirement as set out in the Environment Act is questioned. This requirement needs to be considered in respect of greenfield sites and taken into consideration when assessing the Council's other proposed sites for allocation. Any requirement above 10% would need to be evidenced and viably tested to ensure it would not lead to issues for future delivery and meeting the Council's assessed needs.

Conclusion

Overall, the land at Thanet Way is a suitable, available, and achievable site for development and can make a contribution towards meeting the development needs for the Council within the Plan period up to 2045. The emerging Plan should identify the site for development and consider the appropriate mitigation that could be undertaken to facilitate the development of the site.



We welcome the opportunity to comment on the Draft Canterbury District Local Plan to 2045 (October 2022) and hope that our comments are of assistance as the Council progresses this document. We look forward to future opportunities to provide comments as the Local Plan progresses. The owner of the site is also keen to work proactively with the Council to assist with delivering their development needs within the Plan period.

We trust the above and enclosed is sufficient however should you require any further information or have any queries, please do not hesitate to get in touch using the details below.

Yours faithfully,

Pegasus Group

**Beth Lambourne
Principal Planner**

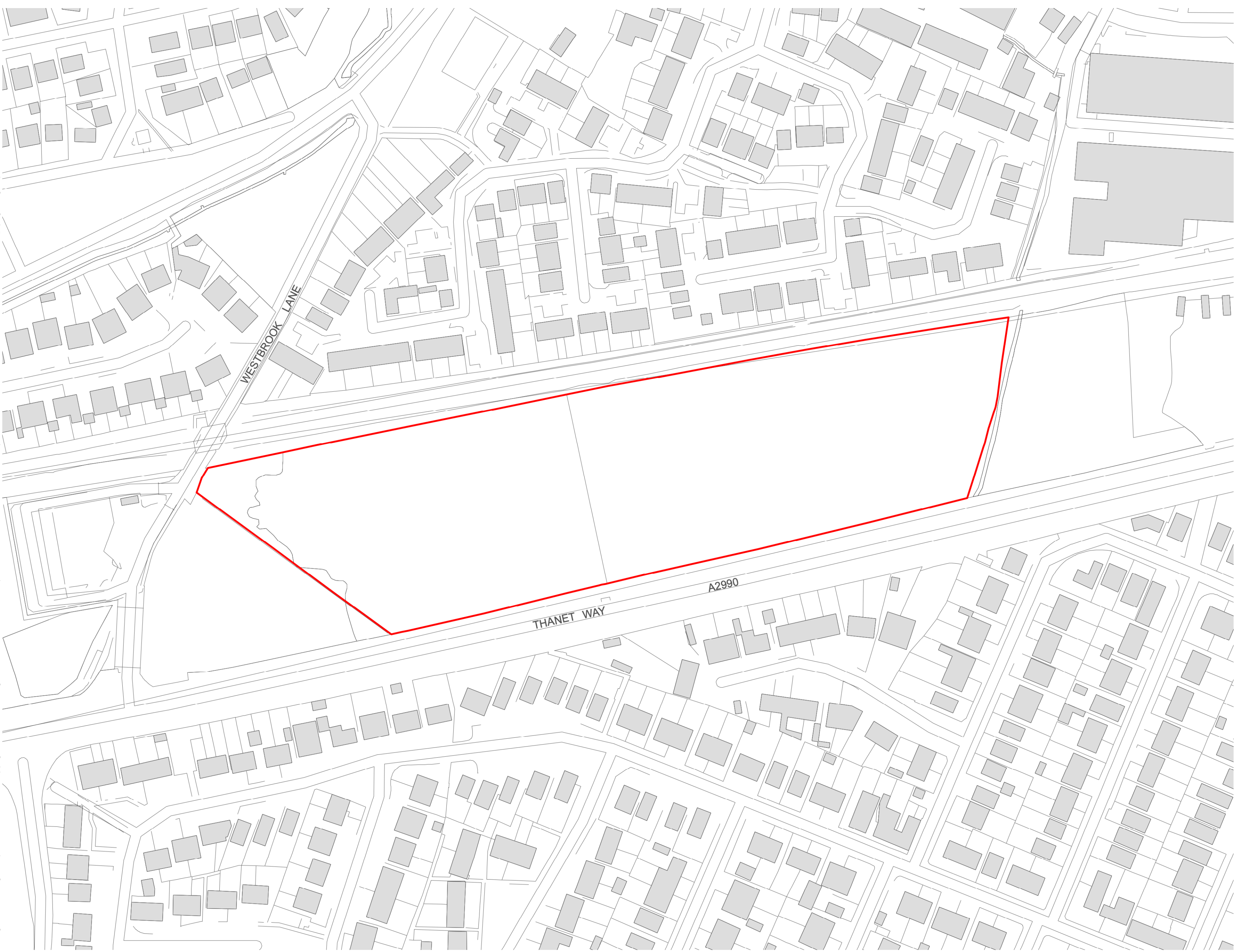


Enc. Site Plan – Land at Thanet Way

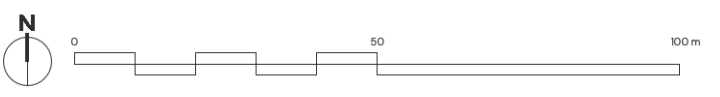


Appendix 1 – Land at Thanet Way Site Location Plan

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KEY
SITE LOCATION
3.3 HECTARES / 8.17 ACRES



THENET WAY, KENT - SITE LOCATION

| PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: JT | APPROVED BY: BT | DATE: 16.01.23 | SCALE: 1:1250@A2 | DRWG: P22-3284_DE_001-1 | REV: - | CLIENT: THE TP GROUP

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