

REPRESENTATIONS

Client: Trustees of the Lord FitzWalter 1988 Settlement

Property: Aylesham South

Date: January 2023

CANTERBURY LOCAL PLAN REGULATION 18 REPRESENTATIONS POLICY R20 – AYLESHAM SOUTH

The principle of draft Policy R20 'Aylesham South' is supported by the landowners of the site, Trustees of the Lord FitzWalter 1988 Settlement. Although the existing settlement of Aylesham is located within the administrative area of Dover District Council, 'Aylesham South' as part of draft Policy R20 sits adjacent to the south and west of the settlement within Canterbury City Council administrative area.

Aylesham is identified within the Regulation 19 Dover District Local Plan as a rural service centre where there are a range of community facilities including a post office, pharmacy, health centre, primary school, rail station and shops selling convenience goods. Additionally, the Regulation 19 Dover District Local Plan includes an allocation at the site known as 'Land to the South of Aylesham' (Draft Policy SAP24) for approximately 640 new dwellings, with development to be focused in the northern part of the site, complementing the adjoining draft allocation which is the subject of these representations.

Clearly the draft allocation for Aylesham South as part of Policy R20 represents a sustainable and logical location and opportunity for housing delivery in Canterbury District. Aylesham South is a large site which adjoins the existing settlement boundary and allocation at Dover District, with the elements of the site which are proposed for residential development benefitting from few constraints in terms of topography, the Kent Downs Area of Outstanding Natural Beauty (AONB), ecology and views.

The Government's objective to significantly boost the supply of new homes is supported by the National Planning Policy Framework (NPPF). The NPPF notes that a sufficient amount and variety of land should come forward where it is needed and that this should be underpinned by the local housing need assessment. An allocation for 420 new homes on this site would significantly contribute to the District's need for 1,252 dwellings per annum over the new Local Plan period to 2045.

Overall, we are supportive of the concept masterplan shown on page 164 of the Draft Plan. These representations are supported by a Vision Document, also prepared by Carter Jonas. This document presents the Trust's vision for a sustainable extension to Aylesham. It sets out the broad design principles and introduces a high level concept masterplan for the site. We suggest that the Vision Document is read alongside these representations.

In terms of the detailed requirements of the draft policy:

1. Development mix

- a) Whilst the site is able to achieve 420 new dwellings, a larger developable area to that shown in white on the concept masterplan on page 164 of the Draft Canterbury District Local Plan would be required to deliver what the policy envisages in terms of housing delivery. The Vision Document submitted in support of these representations demonstrates how the other detailed requirements of the policy are able to be delivered alongside the slightly larger developable area to accommodate 420 dwellings.
 - i. The requirement for 30% affordable housing in line with draft Policy DS1 is supported and is deliverable
 - ii. The requirement for 10% bungalows is supported and is deliverable
 - iii. The requirement for 15% of new homes to be built to M4(2) standards and 5% to be built to M4(3) standards is supported and is deliverable
 - iv. The requirement for an appropriate housing mix, in line with draft Policy DS2 is supported and is deliverable
 - v. The requirement for self and custom-built plots in line with draft Policy DS2 is supported and is deliverable

- b) Subject to the details of the Masterplan, we would seek to include older persons accommodation on site as part of future housing delivery on site. However, clarification from the Council is needed as to whether the 42 units would be included within the overall delivery of 420 dwellings across the site.

- c) Non-residential development:
 - i. We support the contributions towards education subject to viability. Given the requirement for a minimum of 420 dwellings as well as a 50ha country park on site, it is not possible to provide educational facilities on site. However, any future development will contribute towards off-site provision subject to viability. We suggest that this is clarified within the policy.

- d) A new country park of approximately 50ha to include:
 - i. We support the provision of increased and enhanced connections between existing areas of woodland
 - ii. We support the provision of increased and enhanced pollinator and other ecological connections across the site and with the surrounding area
 - iii. We support the provision of new and enhanced pedestrian and cycle routes including family friendly, wheelchair accessible and activity trails
 - iv. We support the provision of viewing locations and hides for birdwatching
 - v. We support the provision of small scale visitor facilities, play areas and parking. The supporting Vision Document show two sports pitches and a pavilion, including café facilities to the west of the country park.
 - vi. Open space provision:
 - 1. The supporting Vision Document demonstrates 21.83 ha of natural and semi-natural space is able to be provided which is well above the draft policy requirement
 - 2. The supporting Vision Document demonstrates that 26.64 ha of new amenity green space, including green corridors, is able to be provided which is well above the draft policy requirement
 - 3. The supporting vision Document demonstrates that 3.13 ha of new parks and gardens is able to be provided which is well in excess of the draft policy requirement
 - 4. The supporting Vision Document demonstrates that 0.6ha of new play facilities, including 0.22 ha of LEAP and 0.38 ha of NEAP is able to be provided across the site, in line with the draft policy

5. The supporting Vision Document demonstrates that 0.91ha of new outdoor sports facilities is able to be provided, in line with the draft allocation
6. The supporting Vision Document demonstrates that 0.76ha of allotment plots is able to be provided, in line with the draft allocation
- vii. We support the consideration of opportunities for parts of the country park to be promoted and managed as farmed landscape. The supporting Vision Document shows three arable fields to the south of the woodland infill.

Overall, whilst we support the principle of a country park in this location, the details would need to be agreed with the landowner. The landowner's expectation is that the country park would be managed by the Council. If that is indeed the Council's intention, then the provision of a country park on this site is fully supported. As part of these representations, we request that the Council provide clarification on the matter of the management of the country park.

2. Design and layout

- a) The use of garden city principles to guide the design and layout of the site is supported, as is the development of the site in accordance with a masterplan. The supporting vision document introduces an emerging concept masterplan for the site which incorporates garden city principles and is considerate of the adjacent draft allocation within Dover District.
- b) We note that this policy part of Policy R20 refers to development being focused in the north-west of the site to maximise connectivity with the adjacent allocation within Dover District but this is an error and as shown on the concept masterplan, development will in fact be located to the north-east of the site. This part of the policy should be updated accordingly. The supporting Vision Document confirms an average net density of 37.5dph can be supported on this site, on the basis of a developable area of 11.2ha. This is roughly in line with what is envisaged in the draft policy (as the density is net).
- c) The mitigation of any adverse impacts on heritage assets, including Womenswold Conservation Area is supported. As shown in the supporting Vision Document, the developable area is situated in the northeast of the site which is the further point from the Conservation Area. A series of proposed landscaping solutions would also help to protect any heritage assets within the Conservation Area from harm.

3. Landscape and green infrastructure

The requirements of parts a-h of this part of draft Policy R20 are generally supported however the more detailed elements will be reviewed in more detail at a later stage when the landowner is at the pre-application stage.

4. Access and transportation

- a) Provide safe and convenient pedestrian and cycle connectivity including:
 - i. We consider the provision of a continuous footway along Spinney Lane between Adisham Road and Aylesham Road is excessive, particularly when it would not tie-in with any existing infrastructure to the west. Alternatively, we believe that this is only required up to the junction with Cooting Road to the west. We suggest that the draft policy is updated accordingly to reflect this. Notwithstanding this, the proposed Vision Document shows a proposed footpath inside the side boundary along Spinney Lane to Pond Lane which will link with the access to the country park along Pond Lane.

The requirements of ii-iii of part a are generally supported, as are parts b-c.

- d) The Eastern Movement Corridor is a new bypass connecting the A2 at Bridge to Sturry. One of its primary objectives is to provide relief to the heavily congested Canterbury ring Road (A28) in conjunction with the plan to create distinct traffic zones within Canterbury itself. It is unclear how the site at Aylesham South would benefit from or generate impacts which would be relieved by the Eastern Movement

Corridor. As part of these representations, we request that further information is required as to how this would be proportionate to the site.

5. Phasing and delivery

- a) The provision of the country park and associated facilities prior to the occupation of 75% of dwellings is supported.

The site is considered a clear opportunity to make a meaningful contribution towards housing need in the District. It has limited constraints associated with it and detailed work with Kent County Council highways is ongoing to assess what measures will be required to mitigate any potential impact that the development could have on the existing highways network. Only part of the wider site is being promoted for residential development with the remainder of the site being retained as open space, in the form of a country park. This will benefit future residents as well as existing residents by providing a useable form of open space. Overall, we are supportive of the above draft allocation subject to the above suggestions and clarifications relating to the specific detailed requirements of this policy being incorporated.