

Planning Policy
Canterbury District Council
BY EMAIL

16 January 2023
Ref: HJ/Let/999

Dear Sir / Madam,

Canterbury District Local Plan to 2045 (Regulation 18 Consultation) ‘Land West of Bodkin Farm, Thanet Way, Chestfield’

Introduction

These representations have been prepared by ECE Planning on behalf of **FPC Income & Growth PLC** in response to Canterbury District Local Plan to 2045 (Regulation 18 Consultation) (referred to hereon in as the ‘Draft Local Plan’).

The representations relate to a potential site for residential development and C2 care home that can be delivered in a highly sustainable location. The site known as **‘Land West of Bodkin Farm, Thanet Way, Chestfield’** is some 11.28 acres (4.56 ha) in extent and is available and achievable in terms of delivering an 80-bed care home and around 75 new market and affordable dwellings.

The Site

The 4.56ha site lies immediately adjacent to the built-up area of Whitstable. It is currently laid to grass over a series of paddocks with some areas in use for equestrian uses and much of the land unused. The topography is generally flat, and the boundaries well established with a mixture of trees and hedgerows, particularly to the south beyond which is the residential area of Chestfield and properties fronting Maydowns Road, the rear gardens of which, back on to the site.

The A2990 Thanet Way runs immediately to the north of the site with views across the flat site from the roadside. The Chestfield & Swalecliffe railway line runs east/west to the north of the A2990, with a mixture of commercial uses alongside including Johnsons Garden Centre.

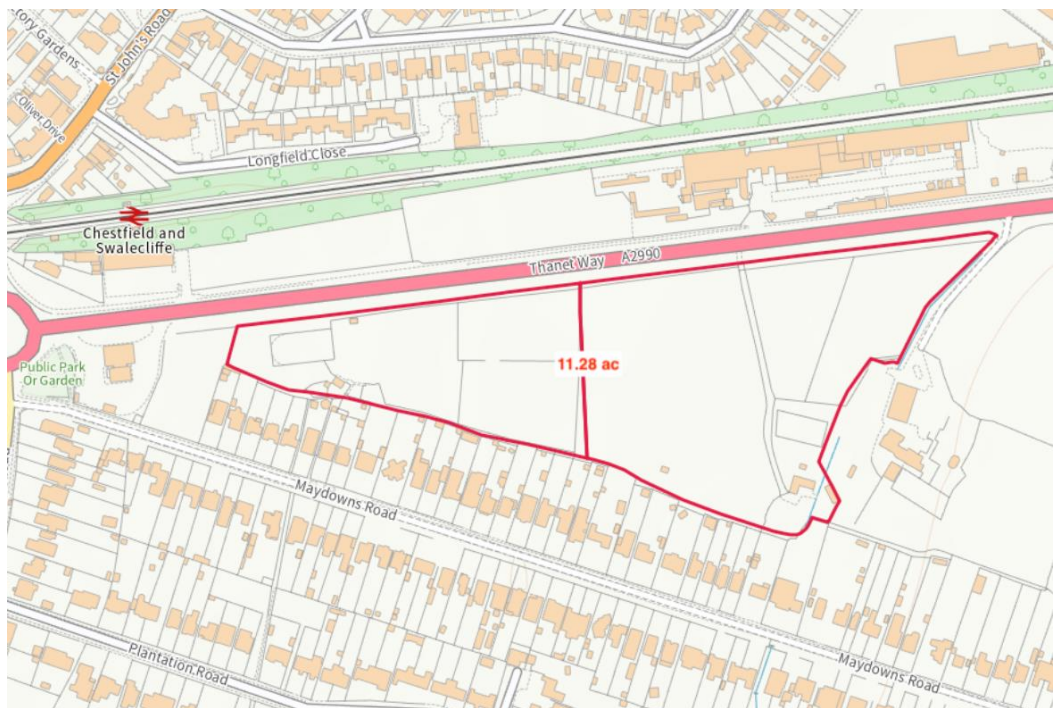


Figure 1 Site Location

The site is located within a sustainable location being in close proximity to a number of local services including Swalecliffe Post office, retail supermarkets, public houses, schools and all the services and facilities that would be expected within the built-up area of Chestfield and around the A2990. The site is also located within close walking distance to a number of bus stops

Bodkin Farmhouse, a Grade II Listed Building, lies to the east of the site which has vehicular access to the A2990 via a track immediately to the east of the Kite Farm Ditch.

Public footpath CW68 runs for part of its length alongside the rear garden boundaries of the properties in Maydowns Road and the south of the site.

Our comments on the draft Local Plan are set out below:

Spatial strategy for the district

We **tend to disagree** with the Vision and Objectives as expressed in this chapter.

It is considered that the ‘Vision’ within the spatial strategy should provide more emphasis on the need to boost housing provision to meet the needs of the District’s population and provide housing for the young, the elderly and those in need. The Vision only refers to a ‘range of housing’ which does not meet the requirements of the NPPF which requires local authorities to meet the Government’s ‘...objective of significantly boosting the supply of homes’. The need to boost the supply of homes should be more explicit in the Council’s Vision for the next 15 years.

This would also better reflect the Council’s own preamble at 1.4 which refers to a,

‘...step-change in the levels of growth the district is expected to deliver, and the Canterbury District Local Plan (2017) identified a series of strategic development sites, predominantly around Canterbury, Herne Bay and Sturry to deliver the required levels of growth to 2031. This plan responds to more recent changes to the NPPF, which further increase the rate of housebuilding the government expects to see in the district and sets out a long term plan for growth and development to 2045.’

Similarly, the **Strategic objectives for the district** should more positively refer to the need to significantly boost new housing provision as well as providing high quality housing, design etc.

Policy SS3 – Development strategy for the district

We **tend to agree** with the overall development strategy for the District.

The reference in *Policy SS3 – Development strategy for the district* to meeting an average of 1,252 new dwellings per year including affordable and older person provision is supported. The average housing figure is an acceptable approach in place of setting a specific housing target as it can be more flexible in helping to boost housing supply now, at a time of significant housing need.

Sub section 3 of this policy is also supported in that, *Whitstable urban area and Herne Bay urban area will be the secondary focus for development in the district. New development will be supported on suitable sites within these urban areas.* Whitstable is well placed to accommodate additional development and to boost the supply of new housing.

3. Whitstable

We **strongly object** to Chapter 3. Whitstable as the proposed allocations do not currently include ‘Land West of Bodkin Farm, Thanet Way, Chestfield’.

It is clear that Whitstable has been identified as an area of growth for new development and infrastructure to best meet the needs of the District. The supporting text at Whitstable clearly identifies that Whitstable has seen limited growth against centres such as Canterbury and Herne Bay and that it is *‘...well placed to deliver some growth during the period of the Local Plan, building on its excellent connectivity with HS1 and the A299.’*

Paragraph 3.4 continues,

‘The strategy for Whitstable is to focus development where it can unlock opportunities for significant infrastructure investment; namely a new secondary school to the north of Chestfield, new A299 slips to the south of Chestfield to relieve congestion and a new park and bus to the south of Duncan Down to serve the town centre.’

In this regard the proposed strategy is flawed in that the Land West of Bodkin Farm is not allocated for housing and elderly care development, alongside the proposed Policy W8 Bodkin Farm allocation for a new secondary school and 250 new dwellings. There is a synergy between the sites and should the Council wish to unlock the full potential of this land for significant infrastructure investment, then including the full extent of land adjacent to Bodkin Farm would create a more sustainable development and make the best use of resources. By excluding the land west of Bodkin Farm the Council is not optimising development and investment in infrastructure in this particular location, therefore failing to create a sustainable site. This piecemeal approach of ignoring Land West of Bodkin Farm would require allocation of land elsewhere to meet local needs rather than concentrating resource on a larger more sustainable site.

This is considered incompatible with the NPPF, and the Council's own strategy as articulated in the draft Local Plan.

The site known as 'Land West of Bodkin Farm, Thanet Way, Chestfield' is some 11.28 acres (4.56 ha) in extent and is available and achievable to deliver an 80-bed care home and around 75 new market and affordable dwellings.

The proposal would represent a logical and sustainable addition to the proposed Bodkin Farm W8 allocation.

In terms of housing provision, the proposals will better meet current needs in supplying a high quality 80-bedroom care home. The need is pronounced in Canterbury District and within Whitstable itself, with supply failing to meet demands of an ageing population. The NPPF states clearly at para. 60 the,

'...objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.'

The NPPF clearly identifies the requirement to meet the needs of the population with specific reference to meeting the needs of older people in Chapter 5. The draft Local Plan is deficient in this regard and the opportunity to plan positively for and allocate a specific care home opportunity, utilising the infrastructure and investment required to support a new secondary school and homes (Policy W8) should be taken immediately.

The requirement for additional new homes is also acute and the site can deliver 50 to 75 new homes alongside a care home in this sustainable location. The requirement for additional homes is unarguable and at this level, can provide additional choice and flexibility for delivery and fit with the approach proposed in *Policy SS3 – Development strategy for the district* to meeting an average of 1,252 new dwellings per year.

The 'Land West of Bodkin Farm, Thanet Way, Chestfield' comprises some 4.56ha of land and the proposals would accommodate:

- 0.5 ha for a new 80-bedroom care home;
- 1.7 ha for 50 new homes and associated infrastructure;
- 2.56 ha for Biodiversity Net Gain (BNG), landscaping, open space and recreation, access and infrastructure.

In housing terms, the site would provide 30% affordable housing in line with Policy DS1 and can accommodate other objectives including, 10% bungalows, 15% of new homes to be built to M4 (2) standards, and 5% to be built to M4 (3) standards and an appropriate housing mix, in line with Policy DS2.

The site has been excluded from the proposed allocation with issues such as flood risk and gap issues highlighted in the Strategic land availability assessment (SLAA) but the issues identified are not absolute constraints by any means – these simply require appropriate assessment and mitigation as addressed below.

The site is subject to some **Flood** constraints, with approximately half of the site within Flood Zones 2 and 3 although these areas of the site would be dedicated to open space, BNG, landscaping and associated infrastructure such as parking and access. The developable areas are considered to be within Flood Zone 1 where residential development is acceptable in line with current policy. Parts of Flood Zone 2 are developable subject to appropriate FRA and mitigation.

Any proposal carried forward would be subject to Flood Risk Assessment (FRA) and detailed mitigation which could include significant environmental benefits not just for the subject site but for the benefit of the adjacent W8 Bodkin Farm developments.

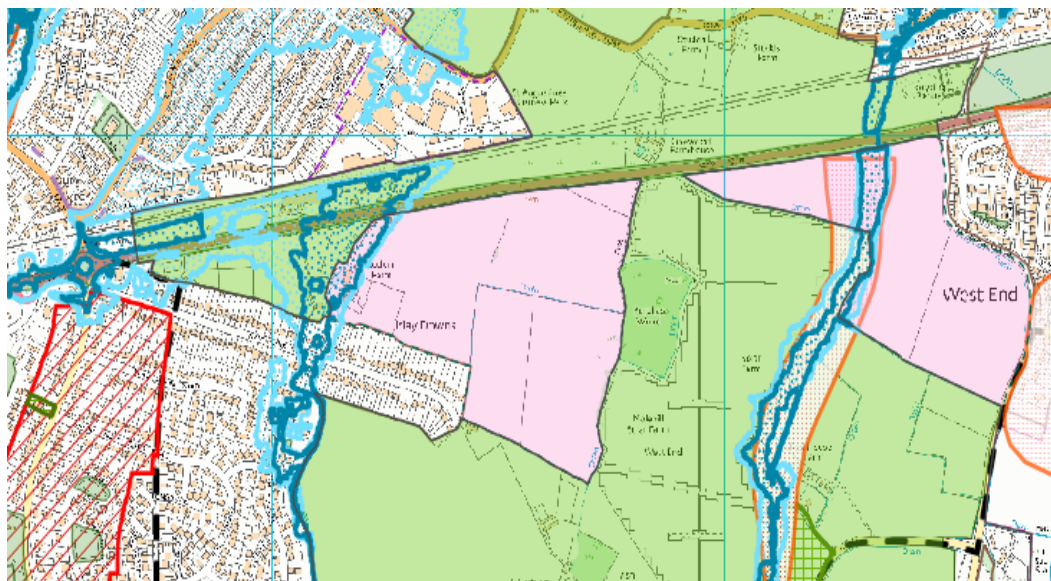


Figure 2 Draft Proposals Map

Whilst the Bodkin Farm W8 allocation proposes to accommodate some open space and landscaping, the inclusion of additional landscaping, open space, pedestrian and cycle improvements and BNG within the subject site to the west would help create a more sustainable and synergistic development, with a more integrated approach to drainage/flood risk, landscaping, impact on the Green Gap and connectivity, with the main footpath links passing along this site.

The current draft Local Plan proposes that the site is excluded from the W8 Bodkin Farm allocation and retained in the **Green Gap** between Herne Bay and Whitstable. This is objected to and the rationale for retaining the 'Land West of Bodkin Farm, Thanet Way, Chestfield' within the Green Gap (and rendering it undevelopable) is neither justified nor logical in this instance.

The supporting Natural Environment and Open Space Topic Paper (October 2022) addresses the appropriateness of the Green Gap between Herne Bay and Whitstable, and express the majority opinion from previous consultations that the green gap be retained (Option NE5H (preferred option)).

The rationale for additional allocations, in this case to support schools and housing in Whitstable and Herne Bay are understood, but the justification for the proposed boundaries is flawed, simply stating that the schools must be accommodated and at paragraph 3.12 that, '*...both sites have been encouraged to have landscape buffers and greenery adjacent to the green gap to prevent settlement coalescence.*'

It is clear from the draft allocations map and the diagram below at Figure 3 that the approach is flawed and as a result of the Bodkin Farm W8 and the Policy HB4 – Land to the west of Thornden Wood Road allocations, there are significant incursions into the green gap which will be significantly compromised in its role and function.

This approach significantly undermines the rationale and justification for **excluding** Land West of Bodkin Farm as the integrity of the green gap in the location of the subject site is compromised overall.

The green gap in the area to the south of the A2990 and between Herne Bay and Whitstable (and to the north of the A2990 and the railway line) creates a significant open gap between the settlements which will be eroded due to these large urbanising developments.

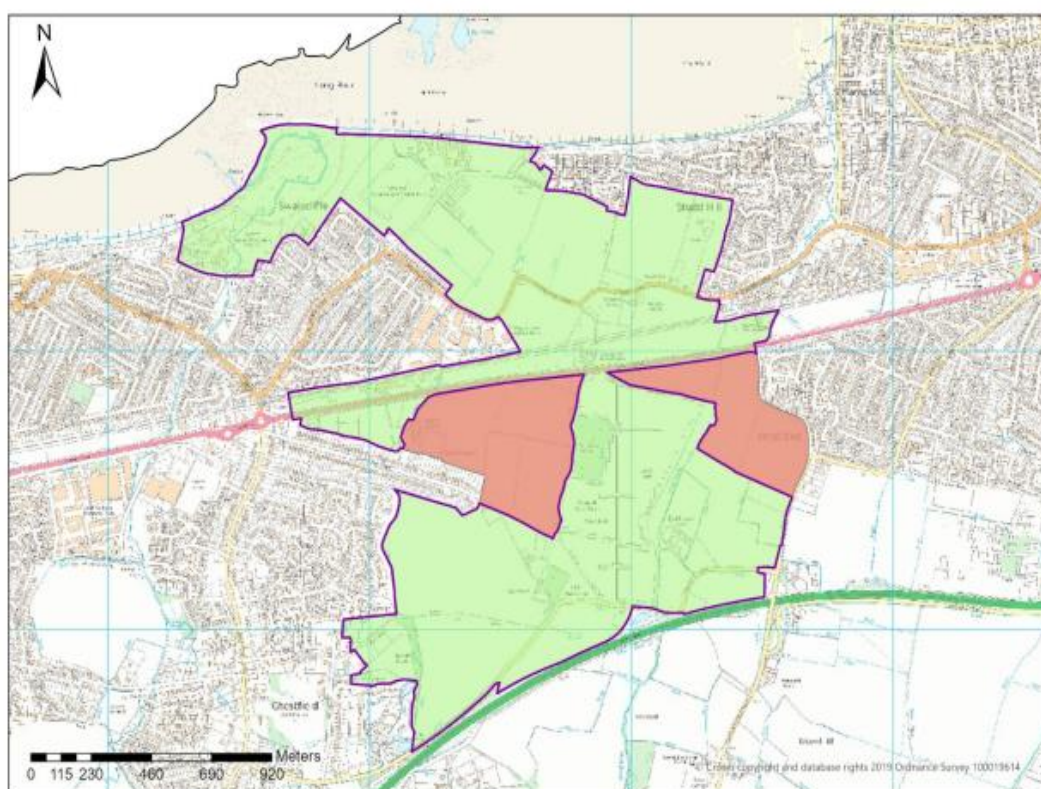


Figure 3.2: Proposed Green Gap between Sturry and Broad Oak (purple outline). The green area is the 2017 Local Plan extent and the red area is proposed for removal.

Figure 3 Natural Environment and Open Space Topic Paper

The contribution that the Land West of Bodkin Farm makes to the green gap currently is notable but is now compromised by the W8 allocation in particular. Following allocation and development of the Bodkin Farm site, the subject site will appear as a ‘missing tooth’ from the more comprehensive urbanising development along this south side of the A2990.

In itself, the Land West of Bodkin Farm will no longer contribute to the wider green gap as it currently does and in this respect the proposed revised Green Gap boundary as proposed in the draft Local Plan is neither appropriate or justified and currently unfairly prevents the sustainable development of land at the Land West of Bodkin Farm, to help meet local needs.

In **landscape** terms, there are significant opportunities within the site and along the site boundaries to retain the sense of openness alongside the A2990 and to create large open natural spaces and additional landscape buffers to the road. This would in itself help to retain a sense of space when leaving Whitstable and contribute to Green Gap objectives.

The site incorporates around 2.56ha for open space, BNG enhancements and landscape buffering, which in relation to the views into the site from the north/A2990 would see the urban development both screened and set back from the road, retaining the green gap objectives, albeit within this smaller site.

The W8 Bodkin Farm development sets similar objectives of landscape buffers and natural screening to help address the landscape impacts of the larger site, an approach that would be integrated across both sites.

In summary, in landscape terms the draft Local Plan must be amended to include 'Land West of Bodkin Farm, Thanet Way, Chestfield'. The site comprises some 4.56ha of land and the proposals would accommodate:

- 0.5 ha for a new 80 bedroom care home;
- 1.7 ha for 50 new homes and associated infrastructure;
- 2.56 ha for Biodiversity Net Gain (BNG), landscaping, open space and recreation, access and infrastructure.

In terms of **Highways and Access**, the site adjoins the A2990 and access from the main road would be both achievable and safe, with good visibility in either direction and sufficient space to accommodate a junction in this location. Should there be opportunities to share primary vehicle access with the W8 Bodkin Farm development then this could be investigated and agreed at the appropriate time.

The proximity to the main transport route and the urban area of Chestfield and Whitstable more widely means that the current site is inherently sustainable in terms of access. It is closer to the urban edge than the proposed school and 250 homes of the W8 Bodkin Farm allocation and closer to the road network and pedestrian and cycle access opportunities.

There are significant opportunities to improve cycling/walking access and safety from the site and it is clear that with further assessment and mitigation that the Land West of Bodkin Farm can meet local plan objectives of provide safe and convenient pedestrian and cycle connectivity, including new and improved walking and cycling routes to Chestfield, Whitstable, Swalecliffe and Herne Bay, safe crossing on A2990 Thanet Way; new and improved walking and cycling connections to Chestfield & Swalecliffe Railway Station; and improvements to the PRoW network crossing and around the site as required.

Policy DS17 – Habitats of international importance

We **tend to agree** with this policy as it comprehensively addresses the need to avoid impacts on the protected habitats. The allocation of 'Land West of Bodkin Farm, Thanet Way, Chestfield' would ensure that development could be accommodated paying full attention to the current constraints across the District and be delivered without harm or undue impact to protected habitats.

Policy DS19 – Habitats, landscapes and sites of local importance

We **strongly object** to draft Policy DS19 in terms of the inclusion of 'Land West of Bodkin Farm, Thanet Way, Chestfield' within the proposed revised green gap boundary. There is insufficient justification for the retention of this particular site in the green gap, in the current circumstances.

Two significant amendments to the Green Gap are proposed which is drawn around the Bodkin Farm W8 and the Policy HB4 – Land to the west of Thornden Wood Road allocations, creating significant incursions into the green gap which will be significantly compromised in its role and function.

The retention of the 'Land West of Bodkin Farm, Thanet Way, Chestfield' site within the green gap is neither justified nor reasonable. The contribution that the Land West of Bodkin Farm makes to the green gap currently is notable but is now compromised by the W8 allocation in particular. Following allocation and development of the Bodkin Farm site, the subject site will appear as a 'missing tooth' from the more comprehensive urbanising development along this south side of the A2990.

In itself, the Land West of Bodkin Farm will no longer contribute to the wider green gap as it currently does and the revised Green Gap boundary as proposed in the draft Local Plan is neither appropriate or justified and currently unfairly prevents the sustainable development of land at the Land West of Bodkin Farm, to help meet local needs.

Policy DS19 and the proposed revised boundary of the settlements and the Green Gap must be revised and redrawn to exclude the Land West of Bodkin Farm.

Policy DS20 – Flood risk and sustainable drainage

We **tend to agree** with this policy which provides comprehensive guidance relating to flood risk. The Land West of Bodkin Farm would be subject to site-specific flood risk assessment, which includes flood risk management measures in accordance with Policies DM14 and DM15, and the NPPF. The site is capable of delivery in this regard with a comprehensive range mitigation that would provide an appropriate and sustainable development.

Conclusion

The allocation of 'Land West of Bodkin Farm, Thanet Way, Chestfield' will deliver significant benefits to the District including the sustainable redevelopment of the wider area alongside W8 Bodkin Farm.

The draft Local Plan must be amended to include the Land West of Bodkin Farm as a specific site allocation for development and associated benefits as follows:

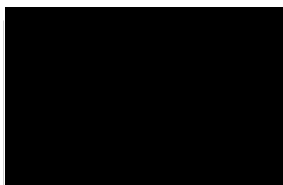
- 0.5 ha for a new 80-bedroom care home;
- 1.7 ha for 50 new homes and associated infrastructure;
- 2.56 ha for 20% Biodiversity Net Gain (BNG), landscaping, open space and recreation, access and infrastructure;
- Significant opportunities within the site and along the site boundaries to retain the sense of openness alongside the A2990 and to create large open natural spaces and additional landscape buffers to the road;

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- Comprehensive flood risk mitigation and management enhancements;
- Safe and convenient pedestrian and cycle connectivity;
- New and improved walking and cycling routes to Chestfield, Whitstable, Swalecliffe and Herne Bay;
- Safe crossing on A2990 Thanet Way;
- New and improved walking and cycling connections to Chestfield & Swalecliffe Railway Station; and improvements to the PRow network crossing.

We look forward to hearing from you. If you have any further queries or require further information, please contact me on [REDACTED].

Yours sincerely
ECE Planning



Huw James MRTPI
Director