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**Canterbury Draft District Local Plan – Regulation 18 Consultation
Response**

**REPRESENTATIONS TO CANTERBURY CITY COUNCIL REGULATION 18 LOCAL
PLAN**

On behalf of Mitcham Building Supplies.

January 2023



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1 Introduction

1.1 Purpose of this Representation

1.1.1 This representation has been prepared by DHA Planning on behalf of Mitcham Building Supplies MBS in response to Canterbury City Council's Local Plan (Regulation 18) consultation.

1.1.2 MBC controls "land north of Eddington Lane, Herne Bay". The land is "protected" for employment use by Draft Policy DS8, and we consider that this is likely to unduly limit the potential of the site to deliver other development needs, specifically in respect of the potential the site has for higher density mixed employment and residential use in what is a highly sustainable location. We make this statement in a context where neighbouring land is identified for potentially mixed use residential and employment development.

1.1.3 The following representations have been duly made, with regards to the tests of "Soundness" (NPPF, para, 35) and identify what changes are necessary to make the Plan "Sound".

Policy	Comment
SS3: Development Strategy for the District	Support
HB3: Herne Bay Urban Area	Object
HB10: Eddington Business Park	Object
DS8: Business and Employment Areas.	Object

2 Overarching Comments

2.1.1 The following overarching comments are made in respect of the Draft Local Plan:

- It is considered that a number of the policies are excessively long. The Plan is therefore not very accessible, especially for those outside the Planning profession and will be burdensome for Planning Officers to effectively implement. Where possible the Plan must be streamlined.
- There appears to be a lot of repetition across policies, which adds to its unnecessary length. It also increases the risk for contradiction between policies, which could impact its effectiveness.
- As set out in these representations, the Plan includes policies that could act against each other, or more particularly in respect of my clients land at Eddington Lane, do not look to maximise the potential of land in the most sustainable locations.

2.2.2 The following representations seek to address some of these points. However, the Draft Local Plan needs to be thoroughly reviewed by Officers with respect to the above.

3 Individual Representations on Draft Policies

3.1.1 The following section provides comments on strategic policy as well as site specific policy.

3.2 Policy SS3: Development Strategy for the District

3.2.1 The Strategy for growth in the District is strongly supported in as much as the Council seeks to meet its objectively assessed housing need. The role that Herne Bay plays as a major urban area is also very much supported albeit you will note that we consider that the role that Herne Bay should play in meeting development need is underplayed, and that if the policy wording is not amended the Local Plan will not provide enough flexibility with site development such as to respond to inevitable cyclical market activity.

3.2.2 We note that there are a raft of policies that place “space” and other requirements on developments, and it is our view that the density of development in the most sustainable locations will need to be increased compared to that set out in the plan, if the overall strategy is to deliver the jobs and homes required.

3.3 Policy HB3 Herne Bay Urban Area

3.3.1 We object to the wording of the policy as it currently stands as it fails to recognise the sustainability credentials of Herne Bay and as a consequence fails to make the most of opportunities that could be delivered by a more positively worded policy. In this respect we consider for example that our clients site could be redeveloped as part of Policy HB10 to deliver a high density mixed use scheme in close proximity to a main line railway station.

3.3.2 At present we are concerned that by leaving our clients site out of Policy HB10, and in a context of Policy DS8 as set out below (which unlike HB10 does not specifically support mixed use development), there is a potential conflict and contradiction between policies. In this respect we consider it would be better if Policy HB10 and DS8 were reconsidered to overcome this potential issue.

3.4 Policy HB10 Eddington Business Park Masterplan

3.4.1 We note that our clients land is not included within this policy. We consider that it should be in order to enable a more efficient and higher quality development in overall terms.

3.4.2 As we have stated above, we have a concern that if the policy does not include our clients land it may be there use gives rise to concerns from intended residential users if there is interest for a multi-layered mixed use scheme.

3.4.3 The sustainability of the site is such that we consider the density in this location should be maximised with an opportunity to provide residential uses above and alongside commercial uses.

3.5 Policy DS8 – Business and Employment Areas

- 3.5.1 While we fully understand the desire to maintain business and employment floorspace in the Eddington Lane Employment Area, we have a general concern that the policy could be considered to conflict with and perhaps be contradictory to HB10. As a consequence we consider there is potential for the contradiction between policies, and the lack of consistency of approach resulting in underutilisation of the land in question.
- 3.5.2 We consider this would be a missed opportunity so close to the mainline railway station and urge CCC to review these related Policies, (SS3, HB3, HB10 and DS8) to seek to ensure the most is made of sites that are highly sustainably located in order to build more flexibility into the opportunities for mixed use and multi-layered proposals within The Local Plan.

4 Conclusion

- 4.1.1 We have made specific representations in respect of our clients land at Eddington Lane, Herne Bay.
- 4.1.2 While we generally support the identification of Herne Bay as a major Urban Area, we are concerned that the above policies as currently worded do not make the most of Land within the existing employment area, or indeed that identified under HB3, HB10 and DS8.
- 4.1.3 The plan as drafted places great reliance on the delivery of development within Canterbury and we consider that in order to be found sound, the Plan will need to ensure sites within Herne Bay are maximised to their potential.
- 4.1.4 For the Plan to proceed to Reg19 and to be found "Sound", we consider that the site specific objections raised in this representation must be addressed.