



Mr Andrew Thompson
Canterbury City Council

By email consultations@canterbury.gov.uk

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Councillor Trevor Bartlett
Leader of the Council

Our Ref: AT/TB/DJD
Your Ref:
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Dear Mr Thompson

Dover District Council representation to Canterbury City Council on the Draft Canterbury City Local Plan to 2045 Consultation

Dover District Council (DDC) welcomes the opportunity to comment on the Draft Canterbury City Local Plan to 2045 and provides comments below.

DDC would first of all highlight that under the Duty to Co-operate, we have a jointly signed Statement of Common Ground (SoCG), which sets out how Canterbury City Council (CCC) and DDC should work together on strategic matters that cross the administrative boundaries and it is therefore disappointing that there has been a lack of constructive engagement on two large proposed allocations adjoining the District boundary in advance of this consultation.

Nevertheless, going ahead, DDC looks forward to close working in respect of all relevant strategic and cross-boundary matters as the Plan progresses to examination. This will be critical to ensure that all growth results in is well connected, properly designed and supported communities, with all impacts properly mitigated.

Development Strategy for the District

DDC notes that CCC is seeking to meet its objectively assessed needs for housing and employment development within its District boundary. This approach is supported in principle and is consistent with the SoCG agreed between the authorities.

DDC does however have significant concerns regarding the location of two development allocations proposed in the draft Local Plan and the potential impacts upon Dover District, which do not appear to have been fully considered, and for which no constructive engagement has taken place with DDC.

DDC currently objects to the proposals for development at Cooting Farm, Adisham (Policy R1) and South Aylesham (Policy R20) for the reasons set out below.

Impact on local road network

As CCC is aware, the draft Dover Local Plan (Regulation 18 – published January 2021) included two housing sites for a total of 1120 houses to the north and south of Aylesham as part of an expansion to the existing settlement. Following consultation on the draft Plan, the site to the north (for 500 homes) is considered unsuitable for development and has been removed from the Plan. The full assessment behind this is set out in the supporting evidence base of the Regulation 19 Submission Version of the Plan, which was published on 21st October 2022 and is intended to be submitted for examination in early 2023. The main reason the site has been considered unsuitable is due to the cumulative impact upon the local road network - issues identified by KCC Highways - the most significant constraint being the junction in Wingham village (A257/B2046), which, due to its constrained geometry is unable to be improved to increase its capacity. Concerns have also been raised by KCC Highways about the cumulative impact upon other parts of the rural road network. DDC has therefore actively sought to reduce the amount of development proposed at Aylesham due to the cumulative impact upon the local road network.

DDC therefore has significant concerns that the capacity of the road network is not sufficient to accommodate the two proposed site allocations set out in Canterbury's draft Local Plan, which are proposing housing numbers vastly in excess of the number of houses originally proposed in Dover's emerging Plan. The transport modelling CCC has carried out fails to consider or assess the impacts of the proposals on this part of the road network.

Following a meeting that DDC officers attended with KCC and CCC, DDC is of the understanding that the site promoter of Cooting Farm is commencing transport assessment work and as part of the Duty to Cooperate, DDC would request to be kept fully up to date of this work.

In addition, the draft Canterbury Local Plan proposes strategic sites adjacent to the A257 at Hoath Farm, Canterbury for 1400 dwellings and Littlebourne for 300 dwellings. A new link road is also proposed in Littlebourne through the sites connecting the A257 to Bekesbourne Lane. Given the constraints at Wingham and Littlebourne and the increased capacity required, a strategic approach is needed to improve the A257 in both Districts.

Scale of development at Aylesham

Aylesham is identified in the rural service centre section of the Canterbury Local Plan (alongside other rural services centres in Canterbury District – Blean, Bridge, Chartham, Hersden, Littlebourne and Sturry). The Development Topic Paper refers to limited expansion at the most sustainable rural settlements, and the two proposals clearly conflict with this strategic approach.

In addition to highways concerns, the removal of the North Aylesham site responds to concerns received from the local community about further large-scale development in Aylesham and the suitability of the settlement to accommodate further significant development, given the range of services and facilities on offer. No consideration appears to have been given within the CCC Local Plan consultation to the overall scale of development proposed in Aylesham and no discussions have taken place with DDC about potential cumulative impacts of the proposed allocations.

Impact on Strategic Road Network

DDC has agreed mitigation schemes for Whitfield roundabout and Duke of York Roundabout, which have been designed to mitigate growth in Dover. This is set out as a requirement in the Regulation 19 Local Plan and supporting Infrastructure Delivery Plan. DDC will want to ensure that the significant development proposals being proposed to come

forward in Canterbury's draft Plan do not undermine or take up any of the capacity that is being created by these schemes.

As set out in the draft SoCG, DDC will continue to work with CCC, KCC and National Highways on the potential impact of the development in the area on the strategic road network.

Land at Cooting Farm (Policy R1)

The following comments relate to the proposed policy for Land at Cooting Farm specifically.

The proposal at Cooting Farm is identified in the draft Local Plan as a new garden community, which is anchored on the existing railway station at Adisham. The indicative masterplan for the site includes a significant landscape buffer between the development area for the site and the existing village of Adisham. The policy at f) i) specially requires this to avoid coalescence with Adisham village, to maintain openness, where consideration should be given to the designation of a new Green Gap.

The development area also extends along the eastern boundary of the site along the length of Adisham Road, with the main accesses being provided off this road, without any policy consideration being given to the need for a similar buffer between the proposed new settlement and the existing settlement of Aylesham. The development as currently proposed would visually and functionally amount to an extension to Aylesham, rather than a freestanding new settlement. To protect the character of Aylesham village and avoid coalescence, a landscape buffer should be provided between the new settlement and Aylesham. This could be provided as a linear park/recreational area for residents of both settlements. Even if a landscape buffer is provided the two settlements will still be very close together and provide services and amenities for residents of both. The masterplan should therefore consider this and how the development can be planned strategically in relation to Aylesham for active travel, infrastructure, and access to services. In the absence of proper consideration of how the proposal can avoid coalescence with Aylesham village to its detriment and how it can be planned strategically in relation to Aylesham, DDC objects to the proposal.

Aylesham currently has no secondary school provision and at present, pupils must travel significant distances to Canterbury, Sandwich or Dover to access secondary provision. It is noted that Policy R1 requires land to be safeguarded for a secondary school. It will be essential for a secondary school to be provided within this development, given the scale of growth proposed in the area.

In addition to these overarching concerns, the following technical comments are made in respects of proposed Policy R1 and its supporting text:

- Paragraph 5.2 of the draft Plan states that phasing will be co-ordinated alongside the current and planned expansion of Aylesham. It is not clear what this means and no discussions have taken place with DDC about the phasing of the current and planned expansion of Aylesham.
- Criteria k) of Policy R1 refers to the use of Snowdown Colliery to provide an open water source heat loop. Snowdown Colliery is located within Dover District and further information and clarification is required in relation to this proposal before DDC can provide detailed comments on it.
- Part 4 of Policy R1 sets out the access and transportation requirements for the development. Notwithstanding the fundamental concerns raised

regarding the impacts on the local road network, the following points need to be addressed within the policy:

- Impacts on the surrounding rural road network, which should include an assessment of potential rat running on unsuitable rural roads and this should be done in consultation with KCC Highways.
 - Due to the scale of development, the capacity of Adisham Road (B2046) needs to be assessed and improvements may be required.
 - The indicative masterplan suggests improvements to cycling and walking and safety along Adisham Road and this should be included within the policy.
- Criteria 5g) of Policy R1 requires the second primary school to be provided upon 15,000 occupations. Should this be 1,500?
 - Key diagram – the location and size of the proposed new settlement (and its location in relation to Adisham village) appears to be incorrect on the Key Diagram.

Aylesham South (Policy R20)

The follow specific comments are provided in relation to the policy for the proposed allocation for 420 dwellings and a new country park on land to the South of Aylesham.

Paragraph 5.30 of Canterbury's draft Local Plan refers to the development being "complementary and coherent with the adjacent allocation within the Dover District". However, the indicative development strategy and Policy SAP24 of the Dover District Local Plan Regulation 19 Submission Version require a landscape buffer to be provided to the eastern boundary of the development to ensure an appropriate transition to the countryside beyond and mitigate the impact upon the setting of the Kent Downs AONB. So, to achieve coherence, modifications would clearly be required to the Dover District Local Plan, which is at an advanced stage now. DDC is aware that CCC has made representations in response to Dover's Regulation 19 consultation to request such amendments be made. Given that DDC intends to submit the Plan for examination without further amendments, consideration would need to be given to whether these issues can be addressed through main modifications as part of the examination of the Plan, which would be up to the Planning Inspectorate to determine.

At present, DDC objects to the proposal on the ground that there is no indication of how the site would be integrated with the adjacent allocation in Dover's emerging Local Plan, or indeed the wider settlement. It would result in poor placemaking and would be isolated from the services, facilities, and transport connections in Aylesham.

Canterbury Business Park (Policy R21)

Given the location of this site with direct access to the strategic road network, DDC needs to understand the impact of the proposal for 51,000 sqm B8 employment floorspace to ensure it does not undermine or impact upon the agreed mitigation solutions for Whitfield and Duke of York Roundabouts on the M2/A2 corridor.

Canterbury Circulation Plan

The proposed Canterbury Circulation Plan would result in changes in traffic patterns for those wishing to access the Canterbury City. DDC does not object in principle to the

proposal, but will need to understand and consider the potential impact the change in traffic patterns will have for those accessing Canterbury City from Dover District and how this will impact upon the road network within Dover District.

Infrastructure Strategy for the District (Policy SS5)

DDC supports the proposals for a new reservoir at Broad Oak, which is understood is needed to maintain adequate water supply over the long term for the region.

Duty to Co-operate and Statement of Common Ground

DDC has two signed SoCGs with CCC. The first SoCG was agreed in April 2021 and identifies the strategic matters on which the authorities have agreed to co-operate. The second SoCG is being prepared with CCC, Swale Borough Council, KCC Highways and National Highways and covers specifically the issue on the M2/A2 corridor (at the time of writing, National Highways is yet to agree to the statement).

Both SoCGs were drafted in advance of DDC being made aware of the significant development proposals on the boundary between the two Districts (R1 and R20). Due to the scale of the proposals and their proximity to the Dover District boundary, these proposals have significant site-specific cross boundary impacts that should be identified and addressed through the SoCGs.

The emerging Dover Local Plan identifies land in close proximity to the District boundary. DDC advised CCC of the potential proposals well in advance of the draft Dover District Local Plan being agreed for consultation, to understand if there were any cross-boundary impacts that needed to be considered. Whilst no significant concerns were raised by CCC at the time, the potential cross-boundary impacts have been identified within the agreed SoCG (secondary education and highways impacts).

It is therefore with disappointment that DDC reads (in the Development Topic Paper at paragraph 3.7) that potential options for the location of new settlements were under consideration as early as May 2021 and yet there was no engagement with DDC earlier in the plan making process in relation to these proposals. This has prevented the cross-boundary issues being considered appropriately.

Notwithstanding the concerns raised regarding the principle of proposals set out in the draft Canterbury City Local Plan, DCC requests more constructive engagement moving forwards between Regulation 18 and Regulation 19 consultations on the above proposals should they progress further, in order that that all matters associated with design, layout, connectivity, local and strategic highway impact and the need for additional services and facilities within the developments are properly considered, impacts are understood and can be mitigated.

Yours sincerely



Trevor Bartlett
Leader of the Council
Responsible for Investment, Growth & Tourism