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Representations to the Draft Canterbury Local Plan 2045

Milton Manor, Milton Manor Road, Chartham,
CT4 7PH

Iceni Projects Limited on behalf of
CCH Build Solutions Ltd

January 2023

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**Representations to the Draft
Canterbury Local Plan 2045**
MILTON MANOR, MILTON MANOR ROAD, CHARTHAM,
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1. INTRODUCTION

1.1 This representation has been prepared by Icen Projects on behalf of CCH Build Solutions Ltd (CCH) in response to the consultation on the Draft Canterbury Local Plan 2045 Regulation 18. CCH are promoting land at Milton Manor House, CT4 7PH, southeast of the Milton Manor Roundabout of the A28, which comprises an area of land of approximately 7.92 ha (the Site).

1.2 CCH are delighted that the Site is allocated under Policy C8 (Milton Manor House) of the Draft Local Plan and generally support the policy direction and intentions of the Plan and the proposed allocation. However, whilst they agree that a suitable scheme can come forward on the Site, CCH wish to raise concerns regarding some part of the allocation and policy direction, as well as seek an amendment to the allocation boundary to incorporate the Ancient Woodland that is on the Site and falls within the responsibility of the landowner. For Policy C8, we would like to highlight the following areas of concern that we would like to see amended:

- The inclusion the Ancient Woodland within the allocation boundary.
- The scope to provide a linear pathway and ecological enhancements in the northern section of the Ancient Woodland designation.
- The 20% Biodiversity Net Gain (BNG) requirement.
- The location of the primary access to the Site.

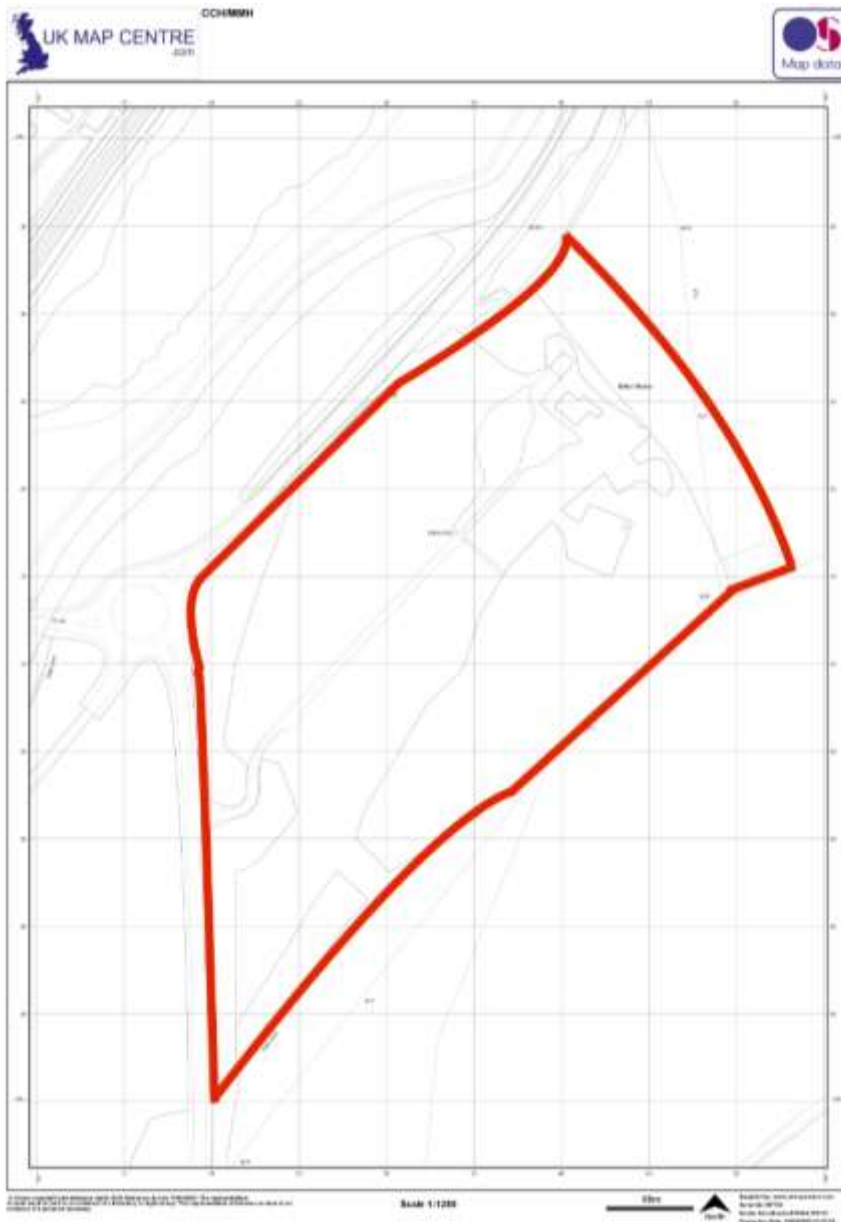
1.3 The Milton Manor House Site represents an opportunity for new residential dwellings in the area, to assist in meeting the District's housing needs which has been severely disrupted by Nutrient Neutrality issues, and is capable of delivering approximately 95 homes in a sustainable location.

1.4 CCH would hope that the next iteration of the Local Plan can strengthen the allocation to support the delivery of a sufficient quantum of housing and assist in meeting the Council's housing targets.

2. ALLOCATION BOUNDARY

2.1 As identified in the Call for Sites submission, the red line boundary of the Site encompasses a rhomboid shape, as identified in Figure 2.1 below.

Figure 2.1 – Site Boundary



2.2 However, the allocation itself in the Draft Local Plan, does not follow the Site boundary, as shown in Figure 2.2 below.

Figure 2.2 - Milton Manor House Allocation – Draft Local Plan

Milton Manor House – concept masterplan



- 2.3 This is somewhat misleading, as any scheme to come forward must take into consideration the existing landscape features of the Site and have due consideration to the Ancient Woodland. It appears that the Allocation boundary, excludes any buffer to the Ancient Woodland itself. However, any scheme coming forward would need to deliver this.

Recommended Amendments

- 2.4 The Ancient Woodland and existing landscaping on the peripheries of the allocation will be and should be factored into the design of the proposals and would contribute to meeting and supporting the open space and biodiversity outcomes for the Site. We therefore recommend the Allocation boundary is extended to encompass the Ancient Woodland and natural features on the periphery of the Site, and to reflect the red line boundary submitted with the Call for Sites (as per Figure 2.1).

3. LINEAR PATHWAY OPPORTUNITY

- 3.1 Initial investigations into the existing site have revealed that some areas in the north of the Ancient Woodland designation are identified to be in poor condition having suffered from *Hymenoscyphus fraxineus* (Ash Die Back). A letter prepared by Chartwell Tree Consultants is provided at Appendix 1 of this Representation which confirms this.

Figure 2.3 – Exposed Area of Ancient Woodland



Above picture courtesy of Google Earth (scrub area shown in red)

- 3.2 In light of these concerns, the letter prepared by Chartwell Tree Consultants (Appendix 1) states that the current position on the ground creates scope to provide a linear pathway through this section of the land, along with the planting of additional tree species which are representative of the local area, leading to a positive change overall.
- 3.3 It is considered that providing a linear pathway in this area is highly beneficial for the layout and would be far more direct and logical, whilst also alleviating pressure elsewhere to achieve the projected quantum of 95 dwellings.

Recommended Amendments

- 3.4 Draft Policy C8 should recognise the opportunity to provide a linear pathway and ecological enhancements through the area of ancient woodland identified to be in poor condition by adding text which requires the applicant to retain those areas of existing ancient woodland and enhance areas that have been depleted.

4. BIODIVERSITY NET GAIN ('BNG')

- 4.1 Following initial investigations into the Site and the viability of the scheme, CCH raises concern in respect to the requirement for Milton Manor to achieve a 20% Biodiversity Net Gain, in line with Policy DS21 of the Draft Local Plan. CCH consider that this is not a sound approach and should be amended to reflect the national requirement of 10%.
- 4.2 Whilst CCH supports the Council's aspirations in seeking environmental improvements across the District, it is felt that doubling the national target of 10% is not justified by the Plan's evidence base. Whilst the achievement of 20% Net Gain would be feasible on some sites, the cost and viability of delivering BNG inevitably depends upon its existing ecological baseline. In the case of Milton Manor, the Site accommodates Ancient Woodland, which sets a high baseline from which to achieve a 20% Biodiversity Gain. Initial investigations into the feasibility suggests that offsite mitigation would be required to achieve this.
- 4.3 The national BNG target of 10%, set by the National Government, is wholly sufficient to achieve the objectives set out within Paragraph 174(d) of the NPPF and the Goals of the Environment Act. As set out within NPPF, the new Local Plan must balance a number of objectives broadly relating to the three pillars of sustainability, and it is considered that placing a requirement on Developers to provide 20% BNG would lead the Plan to prejudice environmental sustainability over the equally important social and economic objectives by impacting on housing delivery and social infrastructure provision.

Recommended Amendments

- 4.4 Rather than requiring the achievement of 20% BNG on all development sites, including Milton Manor, the Council should instead work with developers to achieve the national minimum, and it is where viable to do so, help and encourage them to go above and beyond to foster additional planning benefits and weight afforded to the scheme. The full benefits of this approach may not be captured in the metric nor helped by setting arbitrary minimums for BNG and tree cover. Accordingly, the BNG requirements for Policy DS21 and Policy C8 should be amended to reflect the National Government's target of 10%.

5. HIGHWAYS ACCESS

- 5.1 The subject Site benefits from existing high-quality road, cycle and walking infrastructure that connects the Site to the wider city. There is an existing vehicular access to the Site onto Milton Manor Road which is expected to be used as an access as part of a new development, shown in the concept masterplan for Policy C8 allocation Milton Manor House below.

Figure 4.1 – Milton Manor House concept masterplan



- 5.2 An access on the northern boundary of the Site directly onto the A28 Ashford Road has been agreed in principle with KCC Highways, acknowledged by Canterbury City Council and highlighted in the pre-application response dated 18 November 2019 (LPA ref: PRE19/00262).
- 5.3 Discussion with KCC Highways has established that having a northern access onto the A28 Ashford Road would be beneficial for the scheme in establishing improved vehicular movements onto the wider highway network and into Canterbury on the A28. This would be in keeping with draft Policy DS14 on Active and Sustainable Travel of the Draft Local Plan which asks for proposals to maximise connectivity within the Site and to local facilities, open spaces and public transport networks including bus and rail.
- 5.4 A secondary access will also help to distribute traffic more evenly across the whole development, and therefore would improve the amenity and safety of residents overall. In addition, the implementation of a new access in this location would not result in the significant loss of vegetation, as some sections of this boundary currently comprise weak or no landscape buffering.

Recommended Amendments

- 5.5 It is recommended that the Concept Masterplan for the Allocation is updated to show the northern site access on to the A28 Ashford Road.

6. CONCLUSIONS

- 6.1 On behalf of CCH Building Solutions Ltd, Icen Project thank Canterbury for the opportunity to provide representations on the Draft Local Plan to 2045. The Milton Manor House Site represents an opportunity for new residential dwellings in the area, to assist in meeting the District's housing needs which has been severely disrupted by Nutrient Neutrality issues, and is capable of delivering approximately 95 homes in a sustainable location.
- 6.2 Whilst Policy C8 of the Draft Plan is supported overall, a number of amendments are suggested that would improve the deliverability of the scheme. These relate to:
- The inclusion the Ancient Woodland within the allocation boundary.
 - The opportunity to provide a linear pathway and ecological enhancements in the northern section of the Ancient Woodland designation.
 - The 20% Biodiversity Net Gain (BNG) requirement.
 - The location of the primary access to the Site.
- 6.3 It is thought that with these amendments to the next iteration of the Local Plan, an appropriately designed scheme can be prepared and submitted to the Council that aligns with the proposed allocation, which would ensure that the site would be able to make an important, valuable and early contribution to the Council's housing targets.