

Our Ref:
MG/JJC/5030

Your Ref:

Date:
16 January 2023

By Email

Canterbury City Council
Council Offices
Military Road
Canterbury
KENT CT1 1YW

Dear Sir or Madam

Representation on the Draft Canterbury District Local Plan Consultation in respect of SLAA230 : Land Adjacent to 30 Churchwood Close, Rough Common

1. This representation relates to our previous submission to include land adjacent to 30 Churchwood Close as a housing allocation in the draft Local Plan. It also deals with the council's SLAA assessment of July 2022 and the decision by the council not to include the site within the Local Plan as a result of concerns regarding landscape and ecology impact.
2. We attach with this representation the proposed site layout plan prepared by Clague Architects for the site, together with the supporting landscape and visual overview prepared by Aspect dated October 2021.
3. Rough Common is identified in the Draft Local Plan as a local service centre within the Canterbury District settlement hierarchy. This is in effect an upgrading from its previous status as a village in the adopted Local Plan 2017. There are no new housing allocations in the Draft Local Plan at Rough Common. This is in contrast to the current adopted Local Plan which includes housing allocations on land rear of 51 Rough Common Road, Rough Common and site CA559 Rough Common Road. This is surprising in light of the scale of Rough Common, its close proximity to the City and its good public transport and pedestrian connections to a wide range of facilities. In addition, the draft Local Plan incorporates proposals to upgrade Rough Common Road to include connectivity in this part of the city.
4. Paragraph 1.4 of the Draft Local Plan refers to a significant change in the level of growth within the District. It also comments upon the further increase in the rate of housebuilding which the government expects to see in the District. Paragraph 1.5 recognises that this level of growth will

Canterbury, Kent

[REDACTED]

[REDACTED]

necessitate further development on agricultural land. Our proposed allocation at Churchwood Close does not involve agricultural land. It is land which is within the curtilage of an existing dwelling house, preferable in sequential terms to the development of agricultural land.

5. Canterbury City Council's proposed spatial policy supports limited development within the identified local service centres which protects the rural character of these settlements. We have previously commissioned and submitted a landscape and visual overview which we attach. This demonstrates that the site is very well contained, screened and barely visible from any public vantage point. There would be no encroachment into adjoining woodland. The site would only be visible from the rear of some properties in Churchwood Close and from the end of the cul-de-sac and not from any public rights of way. And the pattern of development would reflect that immediately adjacent to the north west and would be similar to existing spurs of development which extend east from Rough Common Road including Ravenscourt Road and Lovell Road. The proposals would be seen as a logical and appropriate extension of development in Churchwood Close. The impact of these proposals on the character and appearance of the adjacent countryside would be very limited.
6. The proposals involve the development of residential garden land. The development of such land is preferable to encroachment into undeveloped agricultural land, for example. The proposals would, in our opinion, comply with Draft Policy DM2 – residential garden land – which permits the use of domestic garden land to create new dwellings subject to meeting specific criteria.
7. We are also surprised that our site is rejected when the draft Local Plan includes proposed allocations on sites on the edge of rural settlements beyond their built confines which are significantly more prominent, visible and therefore more harmful than this site at Churchwood Close. The council's decision not to include the site and the failure to make any new allocations over and above that in the current adopted Local Plan at Rough Common is inconsistent with the approach it has adopted with other local service centres including Adisham, Barham and Broad Oak where substantial allocations have been made.
8. Policy R21 – local service centres – allows development within the settlement boundaries of the designated local service centres such as Rough Common in certain circumstances. We consider that the wording of Policy R21 should be expanded to include a further category of housing development which will be supported as follows;

(1)d “minor development in appropriate locations immediately adjacent to the settlement boundaries”.

9. Policy DS21 requires the delivery of a minimum 20% biodiversity net gain. The proposed site incorporates substantial areas of undeveloped land which will be used to increase biodiversity net gain.
10. Our preliminary ecological appraisal concludes that the site is unlikely to contain any habitats of protected species. The appraisal considers that, with an appropriately sensitive ecological strategy, any impacts upon matters of ecological interest could be effectively mitigated and biodiversity net gain in excess of the policy requirement of 20% could be achieved.
11. We consider that any adverse impact upon the character and appearance of the surrounding landscape would be very limited, and there would be ecological benefits arising from the proposal.
12. There are also other benefits flowing from this proposed development in Rough Common, apart from the general benefits of housing. The intention is for the proposal to be for 12 serviced self or custom-build housing plots as shown on the attached layout plan.
13. Local authorities have a legal duty to deliver a sufficient number of such plots in order to meet identified need. The Draft Local Plan limits its allocation of self/custom build housing to the larger strategic sites. In other words, the draft local plan directs the District's self/custom housing provision to the larger housing sites of 300 or more new build homes. We question whether there is a real demand for self-build plots within the larger housing developments. We consider that the majority of those seeking a self or custom build site tend to favour smaller bespoke developments. There is a high and largely unmet demand for self-build plots across the District. We consider that it is necessary to allocate smaller sites to meet this particular need. We think this is a much better strategy than relying entirely upon delivery through the large strategic sites. Therefore, while the need for self-build plots across the district is high, we question whether providing for that need within larger housing schemes would be effective. Where lack of demand for self-builds is proven, the draft plan allows for reversion to market housing. Therefore, an over-reliance (or sole reliance) on self-build delivery through housing schemes of 300 units or more could be self-defeating.

Conclusion

14. We therefore ask the city council to reconsider our proposals for the allocation of this site. We consider that it meets the broad objectives of the draft spatial policies and would help to provide much needed sites for self/custom build plots to address the shortfall within the District.

15. In light of the draft spatial policies and in light of the emerging focus of self-build provision within larger strategic sites only, we invite Canterbury City Council to review the suitability of Land at 30 Churchwood Close for around 12 self / custom build plots to include it as a housing allocation and also to undertake the modifications to Policy R21 which we have suggested.

Yours sincerely


Mike Goddard BA DipTP DMS MRTPI

Enc : Landscape & Visual Overview by Aspect, October 2021
Site Layout Plan by Clague Architects

Canterbury, Kent

