

LTR/9192a/RL

Canterbury City Council

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## REPRESENTATIONS TO CANTERBURY CITY COUNCIL LOCAL PLAN (REGULATION 18)

### LAND AT MILL FIELD, BLEAN (SITE REF. R4)

Lee Evans Partnership LLP is instructed by Rubix Estates Ltd. (hereafter, the Promoter) who are promoting the land on behalf of the, the Landowner to submit representations to the Regulation 18 Draft of the Canterbury City Council Local Plan 2045.

On behalf of the Promoter and Landowner, this response advocates for the continued inclusion of Policy R4, and provides reassurance of the availability, suitability, and deliverability of the site for residential development of circa 36 dwellings. Below we provide commentary in support of the policy wording as currently drafted, recognising the Site's capacity to promptly deliver circa 36 dwellings in this sustainable location directly adjoining the settlement of Blean.

To aid clarity, a red line plan of the Site is included as part of this response as follows:



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## CANTERBURY CITY COUNCIL LOCAL PLAN 2045

The Local Plan at this Regulation 18 Draft stage identifies a clear vision for the District in promoting aspirations for residential growth achieved through a range of homes which will meet the needs of the district, improving affordability and supporting growth. It seeks the implementation of this vision over a period up to 2045, with growth focused at the urban cores of Canterbury, Whitstable, Herne Bay, with proportionate growth across the villages.

The overall ambition of the Plan is supported, specifically with recognition of the aspirational level of growth in providing at least 1,252 dwellings per annum to meet housing needs as identified in the evidence base, with a total of circa 22,400 new homes over the plan period. To ensure the flexibility of the plan in its implementation, such figures should not be viewed as a 'cap' to sustainable development, but rather a minimum target for housing delivery. The allocation of a number of Sites at various scales across the District is a sound approach in maximising the efficiencies of the Plan in achieving this level of growth in a sustainable manner across the length of the plan period some 20 years into the future. The allocation of sites is therefore fully supported by the Promoter and Landowner.

Policy SS3 deals with the overall development strategy for the District, specifically the strategy for delivering these ambitions and positively prepared housing numbers. The overall approach to sustainable growth at settlements consistent with their range of services and facilities is supported, in line with the settlement hierarchy. In particular, it is noted that Blean is identified towards the top end of the hierarchy as a Rural Service Centre. It clarifies that the Rural Service Centres – including Blean – play a key role in achieving sustainable development over the plan period. The specific direction of a good level of growth to Blean is agreed, reflecting its high degree of connectivity, range of local facilities, and its proximity to the District's central urban core of Canterbury.

**The allocation of land at Mill Field, Blean at Policy R4 is wholly supported, alongside a related extension of the settlement boundary for the village. Further commentary on the content of Policy R4 is provided later in this correspondence.**

A number of detailed policies are proposed, centred on matters of design, transport, amenity, biodiversity, landscape, and other such disciplines. Whilst detailed commentary is not provided at this stage on the Plan as a whole, it is evident that such policies are necessary to guide development over the plan period. The thrust of such policies in meeting the vision for the District is wholly supported, and the wording of such appears consistent with the objectives of the Plan in responding to local needs over the years up to 2045. Whilst an interim evidence base has been prepared to support the proposed draft wording of such policies at this stage, commentary on such is reserved until the Regulation 19 consultation process.

At the current stage of preparation, it would be premature to consider whether the Draft Plan is legally compliant, is sound, and whether it has met the duty to cooperate. That said, the evidence base as prepared – alongside the reported direction of travel – appears to show positive progress towards planning for sustainable development in the District over the period to 2045, based on an expanding and robust evidence base. We reserve detailed judgement on this until such a time that the Regulation 19 Submission Plan is available for consultation, alongside the Sustainability Appraisal and wider evidence base, later in 2023.

## **LAND AT MILL FIELD, BLEAN (POLICY R4)**

### ***Site Context***

Blean is classified as a rural service centre in the District Settlement Hierarchy with good access to community facilities and services such as a primary school, GP surgery, local shops and community hall. The settlement is located within close proximity to Canterbury and is predominantly linear in form, built along the main route between Canterbury and Whitstable.

The Site at Mill Field measures circa 2.29 ha in total with direct road frontage to Tyler Hill Road on its southern extent. The Site sits closely related to existing residential development due west, beyond which falls the wider settlement of Blean. The Site is undeveloped in its current configuration, and retains an established boundary line to its northern and eastern demise. A group of established, largely mature trees are located within the Site's core nearest to Tyler Hill Road.

Services and facilities within Blean are readily accessible via Tyler Hill Road which provides connectivity beyond the Site's immediate context.

It is also recognised that the Site falls within the designated Blean Conservation Area. Despite this, there are no statutorily listed buildings within the immediate setting of the Site. The Grade II\* Church of St Cosmus and St Damian (List Entry: 1085522) falls to a south-westerly direction, with the remains of a Roman settlement beyond (List Entry: 1018785). Neither is considered to fall in the immediate context of the Site.

The Site falls within Flood Zone 1, an area of low probability flood risk.

The Site falls within the SAMMS Thames, Medway & Swale Estuaries 6 Km Zone of Influence, and the SAMMS Thanet Coast and Sandwich Bay 7.2 Km Zone of Influence. In landscape terms, it falls within the E3: Amery Court Farmland Landscape Character Area.

The Site is otherwise free of onerous planning constraints, as recognised in its assessment by the Council to date.

### ***Commentary In Support Of Emerging Policy R4***

Policy R4 specifically identifies a criteria-based approach to delivery of the Site, fixed around 4 headline topics: Development Mix, Design and Layout, Landscape and Green Infrastructure, and Access and Transportation. The thrust of these development criteria are supported at this stage, in line with the Council's aspirations to maximise site efficiencies and the deliverability of residential development in this sustainable location. The allocation seeks to provide a small extension to the settlement to deliver on housing needs locally, with improved connectivity between the settlement and the Crab and Winkle Way.

As noted elsewhere, the Promoter and Landowner lend full support to the proposed allocation of Mill Field, Blean for residential development of circa 36 dwellings.

Full support is given to the findings of the Strategic Land Availability Assessment findings for the Site and those reported in the Development Topic Paper (October 2022), wherein the Site (under reference SLAA036) was described by the Council as being:

- located within the Blean Conservation Area;
- located on the edge of the settlement where a modest amount of development could be sensitively designed to mitigate adverse landscape impacts;
- located near to existing facilities in the village;

- presenting opportunities for improved walking and cycling connections to the Crab and Winkle Way; and
- presenting opportunities to address local housing needs.

Commentary against these headline topics – derived from the published criteria to Policy R4 – are made as follows:

### **1. Development Mix**

The Promoter & Landowner fully support aspirations to deliver approximately 36 new dwellings in this location, across a development area of circa 1.79 ha. This will include for 30% affordable housing, and 15% of homes at M4 (2) standard, with 5% at M4 (3) standard. It is agreed that housing mix will reflect the provisions of Policy DS2. It is further agreed that – in line with criterion b – proportionate land build contributions will be made towards social and community infrastructure, with details of such to be refined during the application(s) process(es). In line with criterion c, open space will be provided in line with emerging Policy DS24.

### **2. Design and Layout**

In keeping with the provisions of Policy R4 as drafted, there is a commitment to a high-quality built environment. It is expected that an average net density of 20dph can be achieved site wide, with localised variance in such relative to site opportunities and constraints. Development of the Site will – in line with criterion b – correspond to the existing scale, character and form of development locally, including with due regard to the Blean Conservation Area and nearby Grade II\* St Cusmus and St Damian Church.

In line with the findings of the SLAA, it is wholly expected that a scheme of circa 36 dwellings can be sensitively accommodated on-site without causing any undue harm to the setting of these heritage assets.

The Promoter will prepare a concept masterplan that will meet the objectives of the policy wording. The parameters of this concept masterplan will seek support from the Council. The Promoter will also engage with the local community and Blean Parish Council with devising a sustainable and attractive scheme that will be welcomed into the community.

### **3. Landscape and Green Infrastructure**

Five criteria (a-e) are proposed under this heading for the Site; each of which is supported by the Promoter and the Landowner. The aspirational qualities of these criteria in providing quality biodiversity and landscape opportunities are agreed, with the scope for meaningful improvements to the site's condition noted. Opportunities to satisfy these criteria would be reflected in a site-wide design scheme, recognising the design and layout criteria above and the concept masterplan, each reflected a generous landscape buffer.

### **4. Access and Transportation**

The transport strategy for the Site will be informed by site specific technical assessment in due course, though it is wholly agreed that the development of the Site should provide for safe and convenient pedestrian and cycle connectivity, with new and improved connections to Blean.

The SLAA findings note that access is likely achievable from Tyler Hill Road, albeit the impact(s) of new development will need to be reviewed. This is agreed – as with any development proposal – and it is acknowledged that refinement of the Site access and transportation strategy will take place over the course of the next few months.

**Figure 1** below identifies a concept masterplan for the Site as prepared by the Council to support Policy R4. The concept masterplan is supported by the Promoter and Landowner as representing a logical approach to the development of the Site. It identifies opportunities for improving connectivity to/from the Site, as well as the indicative scope for a quality landscape buffer to help best assimilate the development envelope with its wider

surroundings. The concept masterplan will form the basis of onwards site-assessment, though it is noted that technical site assessment may in due course identify additional opportunities to help refine the site's development potential, ensuring its efficiency and deliverability.

Overall, the provisions of Policy R4 are wholly supported in principle.



**Figure 1.** Concept Masterplan, per Policy R4 of the Regulation 18 Local Plan Draft

## SITE DELIVERABILITY

The Promoter and Landowner further wish to confirm the following information to assist in the progression of the Plan towards the Regulation 19 stage, following this consultation period:

### 1. *Current planning status*

The Promoter will be engaging with the local community and Blean Parish Council with development of their proposals for this land. The reports, surveys and studies to confirm that the site is technically deliverable has commenced and the Promoter will build on this throughout their promotion of the site. The intention will be to prepare and submit an Outline Planning Application in line with the aspirations on the Plan (Plan as drafted under Policy R4) which will be done when all technical studies have been completed. As mentioned before, engaging with the local community and Blean Parish Council is at the forefront of the Promoters objectives with this land.

**2. Firm progress with site assessment work;**

As above, an Outline Planning Application is as soon as reasonably possible, with a suite of technical work to support such being instructed. It is anticipated that an Outline Planning Application informed by site assessment work could be prepared to coincide with the Regulation 19 consultation. The Promoter will be engaging and working with Blean Parish Council with their proposals to ensure the site has local support throughout the Promotion of the land.

**3. Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects:**

The Promoter is engaged in a Promotion Agreement with the Landowners; both parties are engaged in the submission of these representations to the Regulation 18 consultation. The Site is held in single ownership and will be delivered to ensure that the homes make a positive contribution for the local community.

The Site is considered available, suitable and deliverable.

## **SUMMARY**

Overall, these representations conclude that the Site subject of emerging Policy R4 is available, achievable and deliverable for the purposes of residential development of circa 36 dwellings.

The provisions of Policy R4 as currently drafted are supported, and suggestions for refinement are made above where appropriate.

The Promoter and Landowner confirm their collective commitment to the delivery of residential development as part of these Regulation 18 representations, and look forward to progressing a scheme in accordance with refined policy directives as the course of the Local Plan process advances in the coming months.

We look forward to onwards participation in the Local Plan consultation, and to working with officers at the appropriate time in the preparation of a planning application.

Yours sincerely

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For Lee Evans Planning