

From: C Brown

Sent: 16 January 2023 13:49

To: CCC Planning

Subject: Local Plan Consultation : Draft Canterbury District Local Plan to2045 : Part 2 of 3

Dear Canterbury City Council

I have the following comments and observations on the above Draft Local Plan using your headings which have been shown in bold.

Policy W8 - Bodkin Farm (page 98)

1. The Draft development proposals include the construction of about 250 new homes, 10% of which are to be bungalows. In addition a new secondary school with a 6th form is included in the development. The site is wedged shaped and bounded on its northern side by the A2990, south western side, partly by Maydowns Road and eastern side by the Herne Bay -Whitstable Green Gap (HBWGGap). However the extreme western end of the wedge shape has not been included in the development proposals, I assume remaining as an isolated part of the HBWGGap.

2. At first sight the above proposals would seem to conflict with "**Policy DS19 Habitats, landscapes and sites of local importance**" (page 224) of the Draft on various points. In particular, paragraph 5 of the policy is relevant in this case as it deals with designated Green Gaps which were confirmed under "Canterbury and District Green Gaps Review (2022)" of which the HBWGGap was confirmed along with 10 other sites.

3. The HBWGGap is not only covered by the general restrictions of Green Gaps under Policy DS19 which include:

1. A limitation to sports and recreational uses;
2. Not significantly affecting the open character of the Green Gap or;
3. Affecting coalescence between existing settlements;
4. Does not result in isolated and obtrusive development.

But additionally include:

5. Education, outdoor leisure or allotments may be considered as suitable uses;
6. But any proposal must not result in a material expansion of the built confines of Herne Bay or Whitstable.

4. In my view the development proposed under W8, which includes 250 houses plus a school, sitting in isolation on higher ground at the eastern end of Maydowns Road, is at odds with all of the above requirements. In addition, if permission were granted it could lead to the development of the extreme western end of the wedge. This development has also to be seen in the context of the proposed adjacent development under "**Policy HB4 - Land to the west of Thornden Wood Road**" as discussed below.

Policy HB4 - Land to the west of Thornden Wood Road (page 109)

5. The Draft development proposals include the construction of about 150 new homes, 10% of which are to be bungalows. In addition a new secondary school with a 6th form is included in the development. The site is broadly anvil shaped, part of which borders the A2990 on its northern side, pointing towards the west where it faces the eastern site boundary of the Bodkin Farm site

(W8). At their closest point, I estimate that the two sites are about 100m apart. Like Bodkin Farm, this site also sits within the HBWGGap and falls to be considered in the same manner under Policy DS19 mentioned above.

6. In short, the development appears at odds with the Policy requirements of DS19. In terms of coalescence, this effect is amplified by the presence of the Bodkin Farm site, which if granted permission could potentially lead to pressure to develop the Green Gap between the two sites.

Planning Background to Land at Bodkin Farm

Land at Bodkin Farm Application Ref: CA/14/01319/OUT
Appeal Ref : APP/J2210/A/14/2227624

7. A public inquiry was held in connection with the above application in August 2015. The development proposed a mixed use development including 290 houses, primary school, 24 unit care home, convenience shop among other facilities, plus associated access, infrastructure, landscaping and cycle/footways. The proposed site is broadly similar to that proposed under Policy W8 but located slightly further to the west, and bounded on its south western side by Maydowns Road.

8. In the Inspector's decision letter dated the 16th October 2015, they noted under "Main Issue" paragraph 10, "Having regard to the Council's remaining reason for refusal, and concerns raised by others, I consider the single main issue in this appeal to be:

The effect that the proposal would have upon the character and appearance of the area, having regard to its location within a designated Green Gap."

9. The Inspector continued "The policy context" at paragraph 13 as follows:

"The Development Plan for the area consists of those policies of the Canterbury District Local Plan, adopted in July 2006, which have been saved from expiry by Direction of the Secretary of State. Of particular relevance to this appeal are saved Policies TC26 and R8. The Proposals Map identifies the extent of the Herne Bay and Whitstable Green Gap, and the entirety of the appeal site lies within it."

10. The Inspector's "Conclusions" at paragraph 50 include the following:

"I have found that the proposed development would conflict with Local Plan Policies TC26 and R8,....."

11. At paragraph 53 ".....However, it is also the case that the proposal would fail to preserve the setting of a listed building, and this is a consideration that must carry considerable weight. Weighing all of the relevant material considerations in the balance, I conclude that they are not sufficient to overcome the conflict with the Development Plan, and on that basis planning permission should not be granted."

12. At paragraph 54 "It is perhaps worth noting that had I concluded that Local Plan Policies TC26 and R8 should be out-of-date, In my judgement the adverse impacts would significantly and demonstrably outweigh the benefits, such that planning permission should not be granted."

13. At paragraph 55 the Inspector stated, "I conclude that the appeal should be dismissed."

14. As I understand the position, Bodkin Farm lies within the site boundary of Policy W8.

In Summary

15. The protection of the Green Gap between Herne Bay - Whitstable has been established for many years being confirmed in the adopted 2006 Canterbury District Local Plan (CDLP). The Inquiry Inspector at the Bodkin Farm planning appeal of 2015 confirmed that development at this site would be contrary to Green Gap Policies TC26 and R8 which were current at that

time. Subsequently Green Gap policy was maintained in the adopted July 2017 CDLP under "Policy OS7 Herne Bay and Whitstable Green Gap".

16. Accordingly, it is suggested that Draft Policies W8 Bodkin Farm and HB4 Land to the west of Thornden Wood Road should be revisited.

Policies W8 and HB4 - Miscellaneous Points

Bungalow Provision

17. Both policies require 10% of their total housing requirement to be constructed as bungalows: this requirement also applies to other strategic sites in the Draft plan eg W5, W6 and W7.

18. As I understand the position, Canterbury District's bungalows stock is the highest of the LAs in Kent, with Thanet DC being in second place with some 2700 less units. As far as I recall, the provision of bungalows was not a requirement in the adopted 2017 Local Plan and it seems that this target should be reviewed. In addition, bungalows, unless single bed and having reduced sizes of other rooms, are I suggest not the most efficient use of development land: NPPF 2021 "Section 11. Making efficient use of land" refers.

Proposed Vehicular Access to Proposed Development Sites and Toucan Crossings.

19. Both Policies, W8 and HB4, require the provision of vehicular accesses to the A2990 plus Toucan crossings. However only indicative details of the proposed junction locations are given, with no information on the Toucan locations.

20. The speed limit on the section of the A2990 where the proposed accesses are indicated is 60mph. There are very few existing accesses on the 60mph section and all are private apart the access to the solar farm, The Herne Bay Recycling Centre (commercial access only) and Johnsons garden centre. In general, vehicular use of these accesses is low.

21. The accesses under Policies W8 and HB4 would, I assume, introduce two at-grade junctions on the A2990 with potentially high volumes of turning traffic during school term times, especially during the morning traffic peak flow of 8am to 9am. The afternoon traffic flow peak of 5pm to 6pm is likely to be less affected, however both junctions would be sited on a high speed section of road and, depending on their configuration, could have road safety implications.

22. The proposed introduction of the Toucan crossings on this section of the A2990 is also, I suggest, a matter that needs careful consideration for road safety reasons.

Regards

C S Brown

Sent from [Mail](#) for Windows