



CCC Consultations <consultations@canterbury.gov.uk>

Re: Protected Open Space Bridge Village

1 message

Andrew Thompson

17 January 2023 at 14:51

To: Nick Cramer

Cc: CCC Consultations <consultations@canterbury.gov.uk>

Hi Nick

Thanks for this. We will process this as a representation on the draft Local Plan. Consultation closed yesterday, but I am happy to accept this as a valid comment in the circumstances.

Andrew

On Tue, 17 Jan 2023 at 14:35, Nick Cramer wrote:

Andrew,

Many thanks for your very helpful phone call in response to my previous question (as attached email).

On our call we also discussed the Draft Local Plan 'neighbourhood plan housing requirement figure' in the section for the Rural Service Centres in polices R3 to R14 being:

- R3 Blean - no figure given
- R5 Bridge - 75 dwellings
- R7 Chartham - 50 dwellings
- R11 Hersden - no figure given
- R14 Littlebourne - no figure given

We spoke of my concern over the clarity and definition of the terminology 'neighbourhood plan housing requirement figure' and how divisive this can be if not clearly / fully defined.

This problem is demonstrated by the attached exchange between Myself, Karen Britton, {Planning Manager (Development and Engagement) Canterbury City Council}, Alan Atkinson (Chair Bridge Parish Council and Chair of the Neighbourhood Planning Group). Alan Atkinson and a local landowner were looking to use the indicative / requirement figure to justify a house building proposal on AONB that is being proposed in the Bridge Neighbourhood Plan. It is clear that the lack of clarity and definition of this 'requirement figure' could cause significant confusion or be purposely misused in the creation of a Neighbourhood Plan and then to inappropriately drive support for housing development proposals in areas that the Local Plan is attempting to protect.

In summary; Karen Britton stated:

***'Indicative figures are not binding on the neighbourhood planning group to provide, as neighbourhood plan groups are not required to plan for housing.
So in short the group are not required to provide for 168 homes.'***

My understanding of the 'neighbourhood plan housing requirement figure' is that it represents the type of organic housing growth that may naturally occur within the settlement boundary over the period of the Local Plan. If this is the case, the definition and purpose of this figure should be much more clearly defined.

The use of the term 'neighbourhood plan' to define the requirement figure is misleading, since although the neighbourhood plan can calculate its own figure or restate the one you supply in the Draft Local Plan, the neighbourhood plan has no ability to influence or drive its achievement. This makes the 'neighbourhood plan housing requirement figure' both divisive and misleading.

My understanding is that the proposed housing growth as defined by the 'neighbourhood plan housing requirement figure' comes from small developments under Local Plan Policy R2 b) and c) and is simply a statement of the 'windfall' housing developed through these policies. Policy R2 a) is clearly in addition to this organic growth figure and it is this type of development that is appropriate in a neighborhood plan as they are defining and controlling it based on realistic review of the need in the area.

I would suggest that the words '**expected levels of organic housing growth through Policy R2 b) and R2 c)**' should replace the words '**neighbourhood plan housing requirement**' for the reasons that; this is not a requirement of the neighbourhood plan and the Parish Council do not have control over it, this can only be controlled by the approval or not of the minor development planning proposals by the CCC Planning as they arise, not by any Parish Council or Neighbourhood Planning Process.

If however you are simply putting out there a target that the Neighbourhood Plan must achieve in addition to the organic windfall growth over this period, these would have to be based on realistically achievable goals within the planning constraints set by the new Local Plan. Since this the opportunities have already been reviewed it is very unclear how this figure could be a realistic target. For the trouble it will cause for such a minimal gain I would respectfully request these targets should be removed from the Local Plan and allow the natural windfall development process to continue.

I hope this clarifies my thoughts on this as input to the Draft Local Plan. Feel free to respond or contact me to clarify.

Best regards
Nick Cramer

On Mon, Oct 31, 2022 at 6:34 PM Nick Cramer [REDACTED] wrote:

Andrew,

Hi, I am supporting the application made by Mike Goddard who applied for Open Green Space in Bridge Village to protect our Recreation Ground and fields to the east up to the A2.

This application appears on the Draft Local Plan Call for Sites map as SLAA271 and is identified for 'Community Use'.

I recognise that the consultations for the Local Plan and then the final approval process may take until 2024.

These timescales would mean that we could well be too late to protect this important village local green space / open space with impending building proposals in the proposed Neighbourhood Plan (Housing proposal in call for sites was SLAA217).

What must we do to proceed with this Local Green Space / Protected Open Space application, separately to the Draft Local Plan process, so we can accelerate this to final review and hopefully approval, much earlier?

Many thanks
Nick Cramer

--
Andrew Thompson
Corporate Policy and Strategy Manager
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[REDACTED]