

# Sturry Parish Council Comments on Canterbury and District Draft Local Plan to 2045

Sturry Parish includes the villages of Sturry and Broad Oak. This response makes general comments about the draft Plan and the policies which have the greatest impact on the parish, this includes many district-wide policies and some policies for Canterbury. The parish council has received comments from residents and these are represented in this response.

Sturry Parish Council is a member of CPRE whose comments on the draft Plan closely reflect very many of the views held by the parish council and residents. We find the CPRE response to be comprehensive and perceptive in assessing the likely environmental, social and economic consequences of the draft Plan. Our response incorporates some specific comments by CPRE but we wish to endorse the whole of the CPRE response.

## General Comments

General comments on the draft plan are that:

- the indexing is poor, practically non-existent, and this makes the navigation of the draft Plan very difficult. We have prepared an index, which is appended and which we are sure others will find useful, however it shouldn't be necessary for respondents to do this.
- The draft Plan refers to many other documents some of these can be found easily, others cannot, and we are making this comment without having found some of the supporting documents. It would be helpful (as with central government consultation papers) for live links to supporting documents to be included in the text at the point where references are made.
- The consultation period coincides with other significant consultations and includes the Christmas/New Year holiday. Once again we find ourselves overloaded with the work involved in putting responses together and consider this to be poor practice on the part of the City Council and, notwithstanding statutory consultation periods, more time should have been allowed for people to respond.

## Sustainability of the Strategy

In view of the experience of poor delivery of the Current LP policies including the non-delivery of SB3 Site 2 (Land at Sturry) and Site 8 Land north of Hersden. It seems that without evidence that delivery rates will improve the draft Plan is setting itself up to fail and cannot be considered sound.

***CPRE comment p2. "The reason for this strategy simply seems to be a rush and desire to meet the unjustifiable housing target as set by the standard method, along with the completely ill-conceived and out-dated concept that building new houses is necessary to fund and improve existing infrastructure deficiencies. What this strategy will actually deliver is yet more unaffordable market homes to serve an external market demand, with any promised infrastructure either watered down or removed entirely by the time the draft allocations are constructed. This seems to be the experience from the current Local Plan and there is nothing within this draft plan to convince us this would not be the experience this draft plan. "***

***CPRE comment p2. "Canterbury City Council (CCC) will be well aware that DLUHC are currently consulting upon significant changes to the planning system. This includes significant and specific changes that they are proposing to immediately make to the NPPF (subject to and following consultation). The intention is for these specific changes to take effect Spring 2023. Amongst the purported aims of the changes are to:***

- *make clear how housing figures should be derived and applied so that communities can respond to local circumstances;*
- *address issues in the operation of the housing delivery and land supply tests;*
- *set clearer expectations around planning for older peoples' housing;*
- *promote more beautiful homes, including through gentle density;*
- *make sure that food security considerations are factored into planning decisions that affect farm land*

***In terms of the specific changes that they are proposing to immediately make to the NPPF, these include:***

***Revising NPPF paragraph 11 so that it effectively discourages "building at densities significantly out of character with the existing area".***

- *Changing the test of Soundness at Paragraph 35 in a manner which would give far greater scope for strategies which do not necessarily meet the standard method housing requirements.*
- *Inserting an entirely new paragraph confirms that "standard method is an advisory starting-point"*
- *Inserting an entirely new draft footnote 30 which puts the focus on brownfield sites where "density should be optimised..."*
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***CPRE comment P3 "In our view, it would be a complete dereliction of duty to the residents of Canterbury if CCC does actively choose to persist under the current system with the clearly undeliverable and unsustainable growth strategy as set out within this Regulation 18 draft plan. Rather, the plan making process should be either paused or adapted so as to take full advantage of these proposed changes. "***

The parish council strongly agrees that the draft Local Plan should be paused in view of forthcoming revision to the NPPF. Otherwise, the Plan will be non-compliant with the NPPF before it is even adopted.

## Reliance on greenfield sites

The Parish Council has concerns over the prioritisation of green field sites. This especially relevant to Sturry Parish which has already lost greenfield areas to two major developments allocated in the current Local plan. We are now looking at a further 194 dwellings being proposed for green field sites (R18, R19, R24 and R25) while City Council-owned derelict land at Hillbrow Avenue has not been allocated.

***CPRE comments p4 “Before any greenfield land is released, far more needs to be done to demonstrate that brownfield opportunities have been maximised. Currently, in making the case that there are insufficient brownfield sites, the plan is just relying on those very few sites that happened to be brownfield sites identified as part of the general call for sites exercise and those sites already identified within Canterbury’s Brownfield Register. This is simply not enough.***

***The Council know that those sites upon the brownfield register are simply a list of sites already known to it, either as a consequence of a planning application or an existing local plan allocation. These add nothing in terms of identifying future additional supply. It is also the case sites that very few brownfield sites will ever come forward as part of a call for site exercise as these are usually in locations where the principle of development is already acceptable, meaning there is very little point in a landowner going through the unnecessary expense of promoting their site through a local plan process. Instead, the real profits are to be made from the promotion of greenfield sites where the principle of development has not been agreed, hence why these naturally dominate any call for sites exercise.***

***Instead, a far more proactive approach needs to be undertaken. Whilst this may include a brownfield specific call for sites exercise, this needs to be undertaken alongside Council led assessments such as an urban capacity review. Local communities and the general public should also be encouraged to identify brownfield sites, with the Council working alongside to identify and overcome existing delivery constraints.***

***With respect to delivery, it is noted that some 53 brownfield or mixed brownfield sites put forward and assessed as part of the site selection process have not been taken forward on the that there were not deemed deliverable. For those sites in otherwise sustainable locations, we would expect to see evidence the Council has pursued all appropriate funding opportunities for brownfield regeneration which may arise from the Levelling Up and Regeneration Bill. We would also expect to see evidence of the Council having fully engaged with all possible delivery partners before determining any sustainably located brownfield site is not deliverable.”***

***CPRE comment p.5 “Likewise, it is not enough to simply list known brownfield locations and regeneration areas as “opportunity areas” in the manner draft policy C3, C23 and HB2 currently does. This is little more than the Council putting these sites on the too difficult to deal with pile, when in fact they are exactly the sites the Council needs to be dealing with before allocating yet more greenfield land. Unless they are properly master planned at this stage, we won’t know how many residential units they can truly accommodate if the density is being maximised in a manner which appropriate to that sites circumstances and setting. Likewise, these sites will never attract any regeneration funding they may need the whole time they are just sitting as some vague aspirational site within a plan. Funding partners need both detail and a firm commitment from the Council to bring a site forward. Only a clear plan allocation accompanied with a Council led masterplan provides this.***

***Overall, unless such proactive steps are undertaken, we are not going to accept the usual argument given to CPRE Kent that there are insufficient brownfield sites available for development leaving no option but to allocate further greenfield land.”***

## Housing targets

The parish council does not understand why the (compulsory) Standard Method must still be based on out of date ONS 2014 household projections (nine years old!) when more recent and more accurate projections are available. This makes the Standard Method unsound and all Local Plans using the Standard Method for assessment of housing needs will also be, intrinsically, unsound. We believe there is justification for the City Council to reject the Standard Method and revise its housing need based on up to date data.

The Housing Needs Assessment 2021 admits that the target of 1252 new homes per year may be excessive but that the surplus can contribute to the funding needed to deliver infrastructure. The illogicality of building houses to fund infrastructure that wouldn’t be needed if housing development was to be kept in line with actual needs seems not to have been considered.

***CPRE comment p3 “The current Regulation 18 draft plan would be committing the District to meeting a clearly unsustainable and unjustifiable arbitrary housing target as set by the Standard Method. Canterbury currently delivers an average of 572 dwellings per year, yet the emerging plan is seeking to deliver 1252 dwellings per year. This is despite Canterbury district being a significantly constrained district with the Kent Downs AONB covering 27% of the district, ancient woodland covering 15.6% of the district, there being 2 National Nature Reserves and some 15 SSSIs, is constrained to the North by the coast (including attractive areas of undeveloped coast at Seasalter, Swalecliffe, Bishopstone and Reculver) and at its core the historic city of Canterbury with its world heritage sites. It is our view that these significant constraints already amount to the exceptional circumstance to divert from the standard methodology. For example, it is noted that 2018 based house-hold projections suggest a baseline need of 10,917 houses over the years 2023-2043, averaging 546 houses a year. This figure far closer reflects actual delivery within the district and therefore we would suggest a better reflection of actual need within the district. “***

***CPRE comment p4. "As it is, current ONS data shows that natural population change in Canterbury has been negative in 19 out of the last 20 years (i.e. more deaths than births) meaning population growth within the district has been driven almost entirely by net migration.<sup>1</sup> Compounding the issue, Canterbury has not been delivering the affordable housing the district clearly needs, delivering on average 69 affordable houses a year over the last 5 years, of which on average less than 9 a year have been social rent affordable houses. This is in a district where only 2% of residents can currently afford a house on the open market on their incomes alone<sup>1</sup>. Consequently, the housing that has been delivered and is already being planned for is predominantly to accommodate an external market demand rather than the existing populations housing need."***

## Sustainable Transport.

Sturry Parish Council entirely supports the CPRE comments, below, on the prioritisation of sustainable transport. Sturry and Broad Oak currently suffer high levels of traffic with rat running along the dangerous Shalloak Road and congestion at Sturry rail crossing. If the proposed Eastern Movement Corridor comes to fruition Sturry and Broad Oak will be the funnel through which the high levels of new traffic will access the eastern end of the corridor via the Sturry Link Road. The risk of heavy congestion westbound at the eastern end of the Link Road is very high and this will encourage traffic to continue to use Shalloak Road and Sturry rail crossing. There will clearly be increased traffic flows through the Link Road and associated increases in air pollution and congestion in Sturry as a result. There are no projections on how serious this will be. The environmental damage caused by road construction is therefore not confined to the loss of agricultural land or the adverse carbon balance resulting from road construction and more, longer and faster car journeys.

Delivery of proposed new roads - The Broad Oak section of Site 2 (LP Policy SP3) is currently under construction without any mitigation against the additional traffic. There is no start date for the Link Road or for the two other major developments needed to provide the necessary funding for this road. The risk of the Link Road not being completed increase as time goes on due to increasing construction costs. Failure to deliver the Link Road will render the Eastern Movement Corridor pointless. The bleeding of Site 2 for Link Road funding led directly to the waiving of existing policies intended to ensure that community needs are met and, indeed, community needs have not been met. This is especially unfair since the new roads will mostly be for the benefit of people living outside Sturry. We would object in the strongest terms to the draft Local plan permitting more funding from local development to be channelled into the construction of either the Sturry Link Road or the Eastern Movement Corridor to the detriment of local communities.

The latest proposal for the Eastern Movement Corridor avoiding the Old Park SSSI, will have serious social and economic consequences for Fordwich. There is, in fact, no satisfactory route for this road.

**CPRE comments p5** “CPRE Kent object to the extent of the new road building in the district proposed in this plan and in particular the South-West Canterbury link road as proposed within draft policy C7 and the Eastern Movement Corridor as proposed within draft Policy C11. It is our view any transport infrastructure funding should be being directed towards genuine and achievable sustainable transport measures which genuinely reduce as much as possible reliance on private cars.

**The benefits of new roads schemes are extremely over-stated and in reality, generate traffic above background trends by inducing traffic, which leads to permanent and significant environmental damage. Specifically, the CPRE report The end of the road? Challenging the road building consensus, March 2017 <https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus> reveals that road-building is failing to provide the congestion relief and economic boost promised, while devastating the environment. It directly challenges government claims that ‘the economic gains from road investment are beyond doubt’; that road-building will lead to ‘mile a minute’ journeys; and that the impact on the environment will be limited ‘as far as possible’. The report shows how road building over the past two decades has repeatedly failed to live up to similar aims”.**

**CPRE comment p6** “CCC’s own evidence base recognises the obvious negative impact that building more roads would have with respect to its climate change ambitions. The Climate change topic paper identifying, even with best case estimates regarding modal shift and the success of the Canterbury Circulation Plan, annual emissions from road traffic will increase from the current baseline of 230 ktCO<sub>2</sub>/y to 249 ktCO<sub>2</sub>/y. Unsurprisingly it concludes “continued growth in journeys projected by proposed development within the plan will continue to increase carbon emissions”. However, rather than seeking to limit the growth and building of roads, it seems that the plan is to offset with further renewable energy infrastructure, concerningly with reference made to both onshore wind generation and further solar farms. With such infrastructure likely to have significant negative impacts in their own right, such as landscape or loss of agricultural land, we believe that this is completely the wrong approach. Surely the demand and need to offset needs to be reduced before yet further destruction of the countryside is considered?

**As it is, the proposed Eastern Movement Corridor would not only destroy a significant area of countryside through the land take needed for the actual road, but also through the land take needed for the significant building of houses required to fund it. The road building alone would come with a significant negative ecological impact, with the intended route currently shown to run through ancient woodland at Trenley Park and through the buffer of the SSSI of Old Park &**

## **Loss of Best and Most Versatile agricultural land must be avoided.**

The loss of agricultural land for residential and commercial development could be quantified and a clear picture of the scale of the loss, compared with the use of brownfield sites could be given. The City Council has chosen not to give this information. The loss resulting from the construction of new roads cannot, as yet, be quantified as the plans remain indicative, but it will be significant and there is no commitment to minimising the impact on loss of the best and most versatile land. The construction of 1,100 houses in Site 2 will be on productive agricultural land as will the 194 dwellings

proposed in the policies for Sturry and Broad Oak. A realistic projection of housing needs would reduce the loss.

***CPRE comment p7. "This draft plan appears to be allocating significant development upon Best and Most Versatile land, yet nowhere is this even quantified, let alone any measures setting out what sequential measures have been undertaken so as to minimise its loss. We do not believe this significant constraint has been given the due regard necessary within the site selection process. As set out within CPRE's recent report "Building on our food security" in the past 12 years England has lost over 14,000 hectares of Grade 1 and 2 agricultural land to development, the equivalent to the productive loss of around 250,000 tonnes of vegetables. It also appears that this figure is increasing, with there being a 100-fold increase in 2022 from that built on in 2010. This loss cannot continue to be ignored which is why it remains our view the selection of this site is at odds with NPPF paragraph 174(b). This issue will need to be give significantly more genuine consideration with respect to the allocations which do make it to any submission version of the plan."***

## Policy SS1 Environmental Strategy for the District

Measures currently being taken to protect of the Stodmarsh Nature Reserve from pollution from sewage are in themselves unsustainable. The major developments in Sturry have been obliged to install package treatment plants on site. These are located within and taking up public open space and very close to homes. They need to be emptied regularly by lorry and the sludge transported by road. This has too many adverse environmental impacts to be considered an acceptable solution to pollution of the river Stour. In the long term the only solution is to curtail damaging development within the Stour catchment area.

We would also like to see the environmental benefits of tree planting extended to developments of less than 300 houses and believe this to be quite possible. Successful establishment of new trees can be difficult and, in itself, have a relatively high carbon footprint so we believe that this provision should be strengthened by creating better opportunities for natural regeneration and by insisting on the protection of soils and existing vegetation during construction phases in all areas destined for natural habitats and other green spaces within new development.

***CPRE comment p8. "We recognise and applaud the number of positive actions set out within this policy. This includes the provision of new open spaces, the protection of habitats and valued landscapes, the full recovery of the Stodmarsh Nature Reserve, the delivery of 20% biodiversity net gain and the 20% tree and hedgerow cover for new development across the district.***

***However, these positives are undermined through the promotion of a spatial strategy which focuses upon road building and unsustainably located garden settlements which will clearly be baking in car-dependency demonstrates what scant regard is really being given to the threat of climate change. Likewise, priority seems to be being given to mitigation measures over avoidance i.e. let's prioritise not losing existing trees and biodiversity ahead of setting out measures about how they are to be replaced. "***

## Policy SS2 Sustainable Design Strategy

Like CPRE we find this policy to be rather weak and are concerned that policies that are couched in the conditional (should, could etc.). This all too often results in them being waived at the slightest pressure from developers. Important policies need to be expressed in more imperative terms

***CPRE comment p10 "With respect to paragraph 5 and 8, we would again question as to how the arbitrary threshold of 300 homes has been reached. Will there not be instances under this threshold whereby such new facilities are required to make a proposed development truly sustainable? Likewise will there not be instances whereby development above this threshold will be needing to contribute to vitality of existing community hubs rather than creating entirely new hubs which will compete with existing?"***

***Whilst we welcome and applaud the commitment to all new development needing to be designed to achieve Net Zero operational carbon emissions, it is unclear how this would be achieved and monitored in practice? i.e. how would you ensure that a new petrol station is operationally net zero carbon emissions? "***

## Policy SS3: Development Strategy for the district

Sturry Parish Council completely agrees with all the CPRE below comments which cover all our own concerns.

***CPRE comment p11 “We strongly object to the proposed housing target of 1,252 dwellings a year. As set out in our overarching comments, CCC must update their Housing Needs Assessment, drawing the most up-to-date evidence. This includes the 2018 based household projections, 2020 based population projections and recent 2021 census releases (which now includes up-to date student and home ownership details). From this, they should be setting a realistic housing need figure based upon the most up-to-date household projections alone, focusing on a figure which is deliverable and sustainable, rather than blindly seeking to meet an arbitrary and artificial uplift.***

***We also call for the employment floorspace figures to be revisited as it is our view the plan is seeking to significantly over-allocate employment space. For starters, clearly it is the case that a refined housing target set in accordance to our above comments will naturally necessitate a similar reduction in employment space. As set out within Lichfields EDTS Focused Update, labour supply based upon actual population projections rather than the inflated local plan housing projections amount to an overall employment floorspace need of 81,410 sqm, yet this plan is seeking to allocate some 172,220 sqm (which is not including retail comparison space). More significantly however, there is already some 146,277 sqm of employment space currently available. This includes a recognised over-supply of land to accommodate growth needs in Canterbury City.***

***It is therefore our view much of the new employment space being allocated, including those significant allocations upon greenfield sites, simply have little to no realistic prospect of delivery. The consequence to go forward on this basis is the areas being allocated for employment uses upon the various greenfield allocations are more likely to be turned into yet more effectively unplanned windfall housing when it comes to the planning application stage. This will have a significant combined impact of firstly undermining any claim around levels of employment use self-containment within these large mixed-use allocations and then secondly a far higher than anticipated impact upon local infrastructure which must now accommodate higher than anticipated housing numbers and employment outward commuting levels.”***

## Policy SS3: Development Strategy for the district

Please see our comments on sustainable transport above. In addition, we wonder why the possibility of congestion charges for private cars in Canterbury have not been considered. This would reduce private car journeys instead of increasing them, encourage people to travel by public transport by making this more financially attractive compared with private cars, would raise money instead of costing a fortune and even encourage more people to take more exercise. It surely wouldn't be more difficult to enforce than the proposed zoning of Canterbury.

***CPRE comment p13 "As set out within our overarching comments, whilst we recognise the intentions of the Canterbury Circulation plan, we share the concerns of many others that this is an ill-conceived solution for the circumstances of Canterbury. Amongst the most significant concern is that it is intrinsically linked and therefore reliant upon delivery of the Eastern Movement Corridor. To us therefore, the Canterbury Circulation Plan is doing little more than attempting to solve the problem of city congestion by sending it elsewhere, creating longer and unnecessary journeys in the process whilst in so doing creating further environmental impact and yet further loss of countryside. We are therefore concerned that no alternative options other than road building for reducing city traffic have been presented or properly appraised within the sustainability appraisal.***

***That is not to say many of the interventions set out with the Transport Topic paper intended to go alongside the Circulation plan are not without merit. It is therefore our view the plan needs to move away from the gimmick that is the zoning plan and be entirely refocused upon maximising and funding the active and sustainable transport measures currently set out to go alongside the Circulation plan. This includes redirecting any developer contribution funding which would be otherwise going towards the Eastern Movement Bypass. Policy SS4 or its equivalent within the submission plan would need to be entirely re-written to reflect and secure such measures."***

## Policy SS5: Infrastructure Strategy for the district

Please also see comments by Sturry Parish Council on public open space – policy DS24, below.

***CPRE comment p14 “The current version of the plan has insufficient clarity regarding the infrastructure needed to deliver the development being proposed and in particular detailed costings.***

***A stark example is the current uncertainty with respect to a new hospital being delivered or what will happen with the two separate sites where land is being safeguarded for this.***

***This lack of basic detail regarding infrastructure is of particular concern for a spatial strategy for which the need to deliver real modal shift is vital. New development should be underpinned by active travel and public transport links that are available from the start to provide the opportunity for residents to use non-car modes of transport from the start. This includes ensuring that funding for public transport and active travel is fully costed and with delivery dates established. The recent Transport for new homes report which looked at Garden Villages and Garden Towns found that they were car dependent resulting in more traffic on roads and the need for massive investment in road capacity; that whilst public transport was very popular it was underfunded as was cycling.”***

## 2 Canterbury

Sturry Parish Council wishes to comment on the following policies for Canterbury:

**C16** The Eastern Movement Corridor please see our comments on Sustainable Transport p5 above.

**C24** Land South of Sturry Road – Strategic Wetland site. It isn't clear how the ambitions for this site will sit with the proposed Eastern Movement corridor. From the various plans we have seen the new road will either run adjacent to or run through the wetland site. Noise and light pollution will therefore have an adverse impact on wildlife and upon the amenity value of the site. It isn't clear how the wetland will be achieved. The land lies within the River Stour flood plain but is only occasionally flooded and most of the site would more correctly be described as wet meadow. The policy doesn't give any detail of how a wetland will be created without massive and damaging earth moving or how it will assist in nutrient mitigation. Is it's intended purpose to mitigate against pollution from the new road?

## 5. Rural Areas

We object most strongly to Sturry and Broad being described, respectively, as a Rural Service Centre and a Local Service Centre. The names invoke images of those places on motorways where motorists stop to relieve themselves and top up with coffee and fuel. The parish has two **villages** and we would like this acknowledged and see policies that help to consolidate our individual identities and communities!

There is nothing in the policies R2 and R21 that protects the rural character or integrity of our villages. It is not clear what is meant by minor development and there is no protection against sequential ad hoc minor development which over time amounts to significant development without any co-ordinated facilities provision or cumulative traffic assessment. The aspiration in this policy to provide community facilities goes no further than not standing in anyone's way and provides no assurance that facilities will catch up and keep up with our needs.

**R18** Land North of Popes Lane. The Strategic Housing Land Availability Assessment records this site as SHLAA11 and SHLAA126. The assessment is for both is similar but erroneous for 126 in saying that the submission was for a cemetery and commercial use. This submission was by the parish council for a cemetery and community use with a very small floor space as offices to help with viability. R18 ignores this submission and allocates the site for housing without any community use. The assessment for SHLAA11 claims that a football pitch will be provided, in fact this is only the size of a five-a-side pitch. We note that both submissions are considered dependent on the provision of the Sturry Link Road but we don't see why this would be necessary for the provision of playing fields, community centre and cemetery as these would generate much less daily traffic than the 110 houses proposed in SHLAA11

There is considerable local opposition to allocation of this site for housing due to the increase in traffic along Popes Lane, which would not, in any case, be alleviated by the Link Road. The proposed location of housing on the site would completely destroy the rural northern edge of Sturry village. The failure of the City Council to ensure that Site 2 complied with existing policies on the delivery community facilities and sports provision has left the parish with an even greater deficit than before. We would therefore expect that the draft policies R2, R21 and R18 to support the use of this site for community use.

We note that the Open Spaces Assessment fails to recognise that there is a considerable shortfall in accessible public open space of all kinds in Sturry Parish. This is despite Sturry having less accessible space per 1,000 population than any of the six areas which are considered, by the Open Space Assessment, to be deficient in open space. The appropriate setting of policies regarding future land use depends on the available background information being reliable. As correct information regarding the provision of public open space has now been given to the City Council in Sturry Parish Council's response to the Draft open Space Strategy we ask for this policy to be reviewed and changed in favour of the submission for SHLAA126. See also our comment on DS24 Public Open Space and sports.

**R19** Land at The paddocks Shalloak Road.

This site was formerly included in Site 2 – Land at Sturry and we are not surprised to see it appear again. We note that access will be from the proposed development in Site 2 Sturry and that there will be no access should the development at Sturry not go ahead. We would oppose vehicular access for 50 dwellings from Shalloak Road at this location.

**RR24** Land at Goose Farm and R25 Land fronting Mayton Lane.

Both these are examples of minor developments which cumulatively add to the local needs for facilities but which contribute nothing towards providing them. See our comments below on DS24. We object to the concept masterplans as these predispose to the provision of 'back of garden fence'

open space and slavishly follow the fashion for insisting on landscape buffer zones. In the past, on the basis of policy compliance, the City Council has permitted, even insisted on, the provision of 'landscape' buffer zones which are difficult to access for maintenance, and soon become, at best, unmaintained, neglected dumping grounds for household and garden rubbish and, at worst, criminal rat runs. Development needs to be properly and positively integrated into the existing landscape and this must start with good and better-informed planning policies.

#### **R26 Broad Oak Reservoir**

The debate over whether this is necessary has not concluded and many residents have serious misgivings over both the need for and effectiveness of the reservoir. We understand from Southern Water that the current water supply cannot sustain new development without significant reduction in water usage by existing customers. New development, including both residential and for employment, must depend on the prior solution of all the problems it will create. Water shortage is a key issue and there seems to be no assurance that the plans for waste water recycling and new reservoirs by Southern Water and South East Water will be sufficient or can be delivered in time for the city council to meet the hosing targets in the Draft Plan.

***CPRE comment p27. "We retain significant concerns over the principle of siting a reservoir at this location. The preamble to R26 acknowledges that there is opportunity to deliver recreational benefits on top of the proposed functional water infrastructure provision, but we remain to be convinced of the case for any reservoir at all at Broad Oak – in which case the policy intention of delivering a recreational facility at the site becomes redundant. We are also responding to the current consultations on Water Resources South East's regional plan and the individual water company Water Resource Management Plans (including of course South East Water, promoter of the Broad Oak Reservoir) and our concerns will be made clear to those organisations.***

***That said, should the reservoir be demonstrated as necessary, and being functionally capable of delivering the water infrastructure output expected of it, we welcome the policy's commitment to improving the green infrastructure. While the Policy refers to a long-overdue safe cycle route between Herne Bay and Canterbury, it carefully avoids making any clear commitment to its provision: Policy R26 must actively commit to the delivery of such a route should the reservoir"***

We would welcome the intention to deliver the associated wildlife and recreational benefits but have concerns over their long-term governance and viability. We are not convinced that water sports will be a realistic option in a situation where the annual fluctuations in water levels could be dramatic and where due to the shallowness of the reservoir the shoreline will retreat considerable in summer. Shallow, warm water bodies with little flow are prone to algal blooms which will be worse if fishing is introduced without strict controls on baiting. Much more modelling of water levels and water quality will be needed to test the feasibility of water-based activities.

*CPRE comments p28 “Environmental concerns: the site safeguarded for the reservoir has developed into a particularly diverse local habitat. While we recognise and applaud the intended commitment to improving green infrastructure, delivering a genuine net gain in biodiversity will be an extraordinarily challenging task.*

*Infrastructure planning concerns: the reservoir is proposed in both the WRSE and South East Water plans, currently under consultation, to help meet the requirements for the projected household growth of the southeasternmost area of the region. We will maintain, in our consultations to both organisations, that the projections of the numbers of households whose needs they are intending to meet are over-stated. Current targets for household growth are known to be flawed, as our representations explain elsewhere (CROSS REF WITHIN CCC RESPONSE) and, aggregated across the wider southeast region, the regional and individual water company projections of need are vastly in excess of the homes likely to be delivered.*

*Hydrological concerns: we understand that the reservoir, situated in the Sarre Penn valley, will need to be supplemented by water pumped from the Stour. It is common local knowledge that the Sarre Penn stream frequently dries to a series of disconnected pools in summer, and that the winter flow of the Stour (to which the Sarre Penn is a tributary) is in long term decline, limiting the options for filling any reservoir at this spot. CCC could find itself left with the worst of all options: high housing targets based on the assurance of water supply from a reservoir that may never fully function, lacking the available water to fill it and failing to deliver the recreational and biodiversity gains that were promised.”*

#### **DS1 Affordable Housing**

We see that the council will accept viability arguments for reducing the required amount of affordable housing. In Sturry we have found to our cost that viability can effectively be used to avoid the responsibility to provide affordable housing. The problem stems from the, now, accepted practice of allowing affordable housing provision to be dependant on residual profit whilst predetermined land values are factored into costs. This is the wrong way round. All policy requirements should be compulsorily added to costs and land values determined by the residual profit. This will help to set sensible prices for development land and where this shows the development to be non-viable then it is indeed non-viable and shouldn't be taken forward.

**DS3 to DS5** The Parish Council is happy with these policies

#### **DS6 Sustainable Design**

For the most part we are happy with this policy but there needs to be more thought given to the trade-off between density, open space provision and saving agricultural land. Higher density should not be equated with poor quality housing and higher densities can mean more open space, shorter walking distances to local facilities and improved viability for local shops. (The first supermarkets were built in high-density housing areas for this reason)

#### **DS7 to DS23**

We are broadly happy with these policies

#### **DS24 Publicly Accessible Open Space**

We have considered this policy in conjunction with the Open Space Strategy and the open Space Assessment. We are pleased to see that the assessment attempts to cover land not owned by the City Council but some of the data recorded by the open Space Assessment is misleading, confusing, and recommendations are overly influenced by a variety of un co-ordinated organisations and poorly thought through relationships between the various open space typologies. Possibly the best section of the open Space Strategy which sets design considerations has not been carried forward into policy. This indicates a negation of commitment to quality on the part of the Draft Plan even though the Open Space Strategy makes a good attempt to define this and make it measurable.

These problems have a considerable adverse impact on Sturry Parish and, if unresolved, will leave existing deficiencies unacknowledged and unresolved. To avoid repetition we have appended our response to the open Space Strategy.

## Appendix 1

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# Appendix 2

## Sturry Parish Council

### Comments on the Canterbury Draft Open Space Strategy 2022

#### General Comments

We note that the Sturry Assessment Area corresponds to the parish of Sturry and therefore includes Broad Oak in all data given for Sturry.

These comments focus on the implications of the Strategy for the Parish of Sturry but consider its wider context and its role in informing the Draft Local Plan

The Strategy is a relatively short document which draws its information and recommendations from other documents including the detailed Open Space Assessment and Canterbury Playing Pitch Strategy as well as sources of guidance from other organisations. These are essential to understanding the Strategy but some are not easy to find, The playing Pitch Strategy, in particular, could not be found. **Electronic links to all supporting documents need to be included in, or appended to, the Strategy.**

A lot of work has been done in cataloguing and assessing public open spaces and the strategy has included public open spaces owned by parish councils as well as the city council. This is to be welcomed and is an improvement on the last open space strategy (unless this information is in the appendices – these are not available on the City Council’s website). Sturry Parish Council has concerns over parts of the Strategy and these are principally:

and the and the exact arrangements for adoption of open space and endowments.

A small point but page numbering would be very useful in navigating the document and needs to be added.

The comments below are intended to represent the interests of Sturry Parish but are also to assist the City Council in securing and protecting sustainable public open space. Criticisms are intended to be helpful and balanced and are accompanied as far as possible with practical advice

#### Section 2 Context Review

**See comment above on links to supporting documentation**

#### Section 3 Summary of Open Space Assessment.

A link to the Canterbury Open Space Assessment needs to be included.

The Open space standards given by the City Council for the purposes of the Open space Assessment are given in the Assessment:

Table 1 Open Space typology definitions. p2

Existing Canterbury Adopted Catchments p11

Canterbury Qualitative criteria pps 9 to 11.

### **3..2 Quality and Value**

**The quality assessments of existing open spaces.** Firstly, only a sample of sites has been used in order to reach district-wide conclusions about quality of existing sites. We are not told how representative the selected site are in terms of typology, size or ownership. Secondly Quality is a many faceted measurement and the criteria for different types of space will, in reality, vary greatly. For instance, it is not appropriate to state, as the Assessment does in many cases, that the value of an area of semi natural space is high when the first defining criterion of value is public use – which will be very limited – and indeed a high level of recreational pressure is unacceptable.

### **3.3 Accessibility**

**The assessment of semi-natural open space and the associated accessibility standards.** - The ANGST standard has been used for the categorisation of semi natural space. As a guide to any ambition to provide accessible semi-natural space the ANGST Standard never was and never will be widely achievable. The standard does not correlate the biodiversity value of sites in assessing their value and the relationship between this and the amount and type of visitor pressure that can be accommodated without risk to biodiversity. Further, the ANGST Standard has been misapplied so that in the Assessment of Open Space, accessibility is considered to increase with the size of the site and, as a consequence, unrealistically high distance thresholds have been applied. This confusion is carried through to the Draft Local plan which gives distance thresholds for semi natural open space of both 750m and 2km without any explanation.

**Accessibility of outdoor sports areas.** The future accessibility standards for sport have been abandoned in the Open Space Assessment in favour of the playing Pitch Strategy and guidance from Sport England. Neither of which appear to be available to members of the public. It cannot reasonable be claimed that residents have been consulted on this aspect of open space provision. The Strategy retains the current distance threshold and quantitative standard. The inconsistency needs to be addressed.

**Play areas.** The accessibility standards are taken from Fields in Trust (formerly National Playing Fields Association). They are ancient and while they were a great step forward in 1925 in post WWI Britain, when the Association was founded, they are not appropriate today in the relatively low density suburban residential areas which make up most residential areas in the Canterbury District and most of its proposed residential development. In medium to low density development the LAP and LEAP distance thresholds are not achievable with total space requirement per 1,000 residents of 0.25 ha unless play spaces are cramped and the activity areas too close to residential curtilages.

The same applies for NEAPS and destination play areas at 0.3ha per 1,000 residents. The recommendation for buffer zones between activity areas and residences is to be welcomed with the caveat must be that the buffer is spatial and not visual so that informal supervision of spaces is not impaired. This is not explicitly stated. The requirement for buffer zones makes the relationship

between the FiT quantity and accessibility standards even less tenable. The possible solution is for the Strategy, and Local Plan policies to insist:

1. that play areas are integral with other types of open space and will not be stand-alone facilities.
2. The distance threshold for green corridors and amenity spaces to be reduced (to 300m?) where these provide green routes to play areas.

### **Sources of open space accessibility and quantitative standards.**

For play, sports and semi-natural space the Assessment and Strategy relies on standards set by other organisations. (ANGST, FiT and Sport England). Each of these organisations has a single focus, an agenda and ambitions of its own all of which mitigate against an integrated approach to open space provision. Reliance on these standards runs the risk of reduced sustainability, and deliverability of open space provision through taking focus away from the many benefits of multifunctionality and the recognition of the importance of a favourable cost/benefit balance – both in delivery and future management of open space. This also needs to be addressed in the Strategy and at in the Local Plan policies.

## **3.4 Quantity**

### **Substitution of one typology for another**

The Strategy comments that gaps in some types of provision occur but that other sites of a different main typology can serve to make up the shortfall where it has secondary roles and functions. This is an acceptable approach to take where open space has significant secondary and tertiary functions and there is genuinely multifunctionality of spaces.

It is deeply worrying that the strategy and the identification of gaps in provision is being informed by misleading data.

Classification of open space as one type or another can be problematical and sometimes appear arbitrary especially where the spaces (often the most valuable spaces) are multifunctional. For instance, In the current quantity standards the amounts of amenity space and green corridor appear to be, to a degree, interchangeable. However, this being accepted, the Strategy needs to set out where typologies are functionally not interchangeable so that false compensation on paper does not occur.

In the case of Sturry semi natural open space over 2km away and of low recreational value has been substituted for all other types of spaces. As a consequence the acute shortfall in open space has been hidden. The Strategy therefore needs to make it clear where one type of open space cannot substitute for another

### **Assessment of Semi-natural open space**

The way this has been subdivided is confusing and unnecessary and the associated diagrams very difficult to interpret as there are no landmarks shown such as roads or rivers. The inclusion of semi-natural space further than a reasonable walking distance from population centres of assessment areas (1,000m) is massively misleading when it comes to assessing the total accessible open space for each area. Likewise, assessment of semi-natural open space as being of high value in the context

of accessible open space is also misleading. These sites may have a very high value for biodiversity and for the wider landscape quality but, compared with amenity space, play areas etc., have a very low value when it come to level of use by members of the public. We would expect a degree of common sense to be applied and we should be able to expect that the statement on accessibility in 2.3 of the Assessment p9 means what it says:

***Distance thresholds aimed at improving accessibility factors (ie. So people can find and get to open spaces without undue reliance on using a car) and helping to identify potential areas with gaps in provision. Shown via maps.***

We see that the West Blean and Thornden Woods have been included in the open space for Sturry. The nearest entrance to the woodland, on foot along the A291, is 2km from the centre of the village. Safer, off -road pedestrian routes are much longer. The nearest car park is 7km away.

It isn't clear whether the travelling distances/times have been measured between existing semi-natural space and the perimeter the Sturry area or to the centre of population. The population is concentrated in the centre of the SE boundary of the parish. Measurements to the northern, eastern and western boundaries of the parish from the major areas of semi-natural space in the Blean complex will therefore give very misleading measurements with regard to accessibility.

An educated guess would be that fewer than 20% of Sturry residents have ever been to these woodlands let alone use them regularly. Why have they been included in our accessible open space? The same question could be raised for Chartham with regard to Hunstead Wood and for Thaninton with regard to Larkey Valley Wood.

Except for a small area near Blean the West Blean and Thornden Woods are privately owned and could be fenced off. This has already happened in the 360 hectares of the woodland covered by the Wilding Project. Here access is confined to the public rights of way running through the woodland. This area could not be considered to be either public or open and is no more public open space than ordinary farmland.

### **Deficiency in Sturry**

Sturry Parish is very deficient in all ty[es of public open space provision. Using the current open space standards this perfectly clear. Sturry Parish Council also produced its own facilities audit in 2019 which paints a realistic picture of the lack of public open space. In the Open Space Assessment six areas area identified as being the most deficient in public open space. For two of these, Chartham and Thanington, large areas of ancient woodland over 1.5km away from the villages have been included. Large areas of semi-natural space at more than walking distance from the centres of village need to be accounted for differently and not considered part of any parishes public open space for the purposes of assessing the degree to which quantitative standards are met. Further, areas of semi-natural space are sensitive areas and unsuitable for high levels of recreational activity.

The table 1 below excludes areas of semi-natural space more than 1,000m away from village centre and provides a realistic comparison of total open space between Sturry and the six areas considered to be deficient in open space.

Table 1 Comparison of Open Space provision in Sturry and the six areas identified as most deficient in open space

Quantitative Open Space comparison Data taken from the Canterbury City Council Open Space Assessment 2022												
Assesment area	Parks and Gardens ha	Parks and Gardens ha/1000	Amenity space ha	Amenity space ha/1000	Play and young people ha	Play and young people ha/1000	outdoor sport ha	outdoor sport ha/1000	Accessible Semi-natural ha*	Accessible Semi-natural ha/1000	Total	Total ha/1000
Bekesbourne	0	0	0.21	0.27	1.96	2.12	2.17	2.35	0	0	4.34	4.74
Chartham	0	0	1.35	0.27	0.4	0.08	6.19	1.25	3.36	0.67	11.3	2.27
Hersden	0	0	0.06	0.03	0.75	0.44	2.77	1.62	0	0	3.58	2.09
Ickham and Well	0	0	0.27	0.54	0	0	0	0	0	0	0.27	0.54
<b>Sturry</b>	<b>0</b>	<b>0</b>	<b>1.33</b>	<b>0.24</b>	<b>0.32</b>	<b>0.06</b>	<b>0</b>	<b>0</b>	<b>0.88</b>	<b>0.156</b>	<b>2.53</b>	<b>0.46</b>
Thaninton	0	0	0	0	0.3	0.11	3.72	1.35	0	0	4.02	1.46
Upper Hardes	0	0	0	0	0.29	0.8	0	0	0	0	0.29	0.8
* Excludes	Larkey Valley Wood		43.93 ha		Thanington							
	Hunstead Wood		16.79 ha		Chartham							
	West Blean and Thornden Wood		566.67 ha		Sturry							

To a degree parks and gardens, amenity space/green corridors, and play areas can substitute for each other. We can compare the provision in Sturry with other deficient areas on this basis as shown in Table 2

Table 2 Comparison of Recreational Open Space provision in Sturry and the six areas identified as most deficient in open space

Parks, Amenity and Play Spaces		
Assessment Area	Total hectares	Total ha/1,000 pop
Bekesbourne	4.34	4.74
Chartham	7.94	1.6
Hersden	3.58	2.09
Ickham and Well	0.27	0.54
<b>Sturry</b>	<b>1.65</b>	<b>0.3</b>
Thaninton	4.02	1.46
Upper Hardes	0.29	0.8

Note; Table 2 includes the open space typologies where recreation is considered to be the primary function namely:

- Parks and Gardens
- Amenity Space/Green Corridors
- Provision for children and young people

The comparisons in Tables 1 and Table both show Sturry to be deficient in open space provision. In terms of area per 1,000 population Sturry has less public open space than any of the areas which have been identified by Canterbury City Council as being deficient.

**How can the residents of Sturry Parish have any confidence that the Open Space Strategy or the Local Plan it informs will deal with local deficiencies if the methods of assessment are manipulated so as to deny that any deficiencies exist?**

This misrepresentation comes on top of the inadequacy of provision of open space accepted by the City Council from the two major sites covered by existing policy SB3 (Site 2) This inadequacy is both quantitative especially with regard to policy requirements for sports provision, and qualitative with large areas failing to meet the basic policy requirement for informal surveillance, security of private residences and recreational value.

## Part 4 vision and Aims

The vision together with the aims should be the driver of any strategy. Why is this section relegated to Section 4 and not at the head of the document.

The Parish Council notes that Aim 3 states “ **To promote and secure new provision and facilities where the current or future demand requires it**”. The first step in fulfilling this aim is the recognition of existing shortfalls which, in Sturry, the Strategy has failed to do. The Parish Council identified the shortfall in provision some years ago and in the Call for Sites submitted an area suitable for meeting all requirements for playing pitches, amenity space, green corridor and a community building. Please would the city Council explain why this site was allocated for housing with the minimum provision of all open space typologies except semi-natural space, which has relatively low amenity value.

## Part 5 Objectives

**Objective 1** *“Open space provision should be protected I recognition of its contribution to communities. Any potential loss of provision needs to be in line with Policy D24S of the Local Plan.”*

It is generally the case that the Open Space Strategy informs policy not the other way round ie Policy DS24 will refer to the provisions of the Open Space Strategy – not the other way round – or what is the point of the Strategy?

The text under this heading deals almost entirely with new open space provision. The small amount that actually refers to protection of existing open space should be left under this objective. For the rest a new Objective 2 for creation of new open space in proposed residential areas needs to be created. Existing Objectives 2 to 9 need to be renumbered accordingly.

**Objective 1.2.** “As a minimum,” etc. All this isn’t very clear. Is it the case that all developments must provide the standards in full but, depending on the size of the development some can be provided off-site. Or, is it the case that site of between 3.5ha and 7.4 ha don’t need to provided for sports and allotments at and sites of under3.4ha only have to provide green corridors and amenity space.

**Objective 1.3.** Please see the comment above p2 on the flexibility of typologies,” the Strategy needs to set out where typologies are functionally not interchangeable so that false compensation on paper does not occur”.

**Objective 1.4. Sports pitches** – there is nothing in the Draft Open Space Strategy about the quantities or locations for outdoor sports of different types. We can’t find the Playing Pitch Strategy and cannot comment on tis provisions.

**Objective 1.5. Quality Standards** - All of this should be in its own section in which the differences in quality criteria and priorities for different typologies are properly identified. The points raised are all generally good but there is no one ‘size’ that fits all.

**Objective 1.6.** The designations are totally unworkable for many sites unless the open space provision is given first priority in the design process with these designations in mind. The history of open space planning in Canterbury doesn’t give us much hope.

Freehold ownership. What about the ownership of sites below 300 homes and

Can we assume that if a parish council takes ownership it will get the endowment? Who takes the endowment for sites of less than 300 homes. Does the endowment mean that there will no longer be services charges by management companies etc. for open space maintenance? If not why not?

**Objective 1.7. Accessibility standards** It is normally the role of an open Space Strategy to determine what these standards should be and inform the local Plan.

**Objective 1.8. Loss of public open space.**

a. needs to refer to the full functionality of the site and not just to recreational amenity and appearances.

b. This is usually the 'public interest' card played when public open space gets in the way of the Council's agenda. Too often open space is the soft target when looking for sites and only very rarely can sites be found that are comparable in their size, accessibility or value. We worry because this is coming from a council that would have built a road through the Old Park SSSI. Open spaces are becoming evermore precious and most existing residential areas are undersupplied. The strategy should insist that the removal of or encroachment into open space can only be done in exceptional circumstances where public health and safety or essential public services would otherwise be at risk – and must further be subject to a sites appraisal which makes at least a spirited attempt to find an alternative site.

The Draft Local Plan claims, based on the playing Pitch Strategy that there is an over provision of sports fields. Why can't we find this Strategy, as far as we know none of the outdoor sports clubs in Sturry were consulted on the Playing Pitch Strategy.

**Objective 1.9. Good**

## **Objective 2 Existing Sites**

We generally support this objective but why on earth has Ince Road Play Area been identified as a priority for enhancement for biodiversity? It is minute with no connectivity with sites with biodiversity value or potential. It would make far more sense to prioritise the Park View recreation ground in Sturry which has more potential and connectivity with adjacent woodland.

## **Objective 3. The provision of open space by new development**

This is a real rag bag of loosely related ideas.

It refers to provision standards which are not either set out or justified in the Strategy and this need to be addressed.

The second paragraph partly conflicts, partly repeats 5.1.2.a

The third paragraph digresses into requirements for future ownership and financial sustainability. There are lots of unanswered questions here:

1. If parish councils take on the freehold of new open space will they receive the endowment?
2. What forms can the endowment take – capital, property?
3. Who will own the sites of fewer than 300 houses and who gets the endowment for these?
4. Does the payment of an endowment mean that residents will not have to pay service charges for open space maintenance?

5. What will the knock on effect be on developers' ability to meet other planning requirement? Fourth paragraph refers to the CCC open space calculator which doesn't seem to be available anywhere.

The fifth paragraph begins "In such instances" – in what instances? The rest of the fifth and the sixth paragraphs are almost incomprehensible and need rewriting.

## **Objective 4**

Why have the provision of this objective and Appendix 2 not been developed into proper policy recommendations. There a good deal of excellent material here – better than currently used by the City Council. It needs to be taken out of conditional language, put into the imperative and given more weight. We would like to see more emphasis on cost benefit analysis for open space to ensure that the highest possible level of benefit is achieved for the cost of both providing and maintaining open space. The key to this is multifunctionality wherever possible and guidance on how this can be achieved should be part of this strategy. Though we can see some improvements here on earlier qualitative provisions it could be taken further. For example (but not exclusively):

- moving away from the idea that children only play in play areas. (Related to this would be abandoning the LAP designation for play areas. Some authorities have done this already. The LAP spatial requirements are not implementable and makes no sense except in very high density and flatted developments especially, now, with the requirement for buffer zones around activity areas. The LAP function can easily and beneficially be incorporated into the Parks, Amenity Space and Green Corridor typologies.
- that there is safety in numbers and
- green space should form part of pedestrian routes between key destinations.

## **Objectives 5,6,7,8 and 9**

We agree with all these.

## **Appendix 2**

**Allotments-** must be situated away from the shade of tall trees (otherwise there is no point in having them) and if screened by vigorously growing hedges additional space must be allowed as a buffer between the hedges and the plots.

### **Amenity Green Space**

Should also be central forming a focus for residential areas and be co-located with supporting facilities such as toilets local shops, schools and play areas.

### **Natural Green Space**

Can be more peripheral to residential areas than amenity space but still within walking distance.

### **Parks and Gardens**

Every opportunity should be taken to use this typology to support the viability of local retail and hospitality and cultural enterprises. So should allow overspill of activities such as café seating areas,

exhibitions, street music even occasional private receptions and keep fit sessions (this has been made to work in some places and is a source of revenue).

### **Provision for children and young people**

Generally really good but please comments on the LAP designation. Very glad to see the inclusion of the buffer zones, the availability of kick about, running about space generally improves behaviour and mitigates against nuisance. Given the quantity standards and accessibility thresholds for play areas they will need to be incorporated into other open space types to make the buffer zones possible. This is not a bad thing.

## **Omissions from the objectives**

### **Public rights of Way**

Not mentioned at all in the Strategy. This is a significant oversight as the PROW network opens up routes through huge areas of open space. No open space strategy can be complete without inclusion of serious consideration of the contribution public rights of way make to recreational opportunity and health. Management of public rights of way is the province of Kent County Council but it is within the remit of local planning authorities for new housing development to ensure that:

- within new residential development new public open space of all kinds but especially green corridors should connect directly to the public right of way network wherever there is an opportunity to do so and this connection should be safe, attractive and fit for purpose as a recreational route and, more importantly, a convenient route between key daily destinations.
- Secondly the strategy should provide for developer contributions towards the improvement of existing off-site rights of way wherever these are out under increased pressure from development and serve the interests of new residents.

### **Green Gaps**

These have not been mentioned but are considered essential by many residents who wish to retain socially and visually distinct a settlements especially where a rural edge is considered an essential part of the settlement character. Please can we have a commitment to retain and protect these.

## **Section 5 Action Plan**

It is understood that this might need amending following consultation – as might any part of the Strategy. However, a draft Action Plan showing at least the priorities, and proposed implementation timetable should be included.