

--Email From External Account--

Dear Sir or Madam,

I write to request the council to reconsider its definition of rural business in Appendix 1 : Glossary of the draft Canterbury District Local Plan 2040. I am conscious that others have made representations on this. I request that the term 'rural business' and its definition be deleted in their entirety from page 251 of the Glossary.

The inclusion of this narrow definition of a rural business limits it to agriculture, agri-environmental schemes, equestrian, horticulture or viticulture businesses. This narrow limitation is not consistent with paragraph 88a) of the National Planning Policy Framework (NPPF) which states that: *"Planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas."*

Paragraph 89 of the NPPF further states that: *"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport."*

The excessively narrow definition in the Glossary is also reflected in paragraph 6.34 of the draft Local Plan which again is out of step with paragraphs 88a) and 89 of the NPPF. The wording of paragraph 6.34 should be amended to closely reflect the wording of these two paragraphs in the NPPF.

In conclusion, we invite the council to modify the wording of paragraph 6.34 and to delete in its entirety the reference to rural business in the Glossary of the draft Local Plan.

Yours faithfully,

Mike Goddard BA DipTP DMS MRTPI

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--Email From External Account--

Dear Sir or Madam,

I write to draw attention to what I consider to be a significant omission in draft Policy DS10 in the draft Local Plan and which I strongly recommend should be amended in your Regulation 19 draft Local Plan to be published early next year.

Policy DS10 – Town Centres and Community Facilities

Sub-paragraph 6 of Policy DS10 grants planning permission for the loss of a community facility where:

- a) the proposed use does not threaten the vitality and viability of the centre.
- b) the proposed use is not detrimental to residential amenity.
- c) the proposed use does not jeopardise the variety of services available in the centre to meet the needs of the local community; and
- d) the use of the premises for commercial or community use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least two years.

My concern is that this policy does not contain the sub-clause in Policy QL3b of the 2017 adopted Local Plan which supports the loss if it can be demonstrated that there is alternative provision for a similar type of use within an acceptable working distance of the facility which is proposed to be lost. This was an important requirement of the current Development Plan policy and reflects other similar policies elsewhere within local plans adopted by other local planning authorities. The absence of such a criterion would omit a very important assessment of the availability of other facilities within an acceptable walking distance. The presence of those facilities is significant for two particular reasons. Firstly, because their existence may have had an adverse impact upon the viability of another pub within an acceptable walking distance and; secondly, because it involves the necessary evaluation of whether there is any other suitable similar community facility nearby which can provide the services which will be lost as a result of the demise of the community use. Those two considerations are a vital part of the necessary assessment when considering the loss of community facilities.

I therefore recommend that Policy DS10 be amended to include similar wording to that which is contained within adopted Local Plan Policy QL3b.

Yours faithfully,

Mike Goddard BA DipTP DMS MRTPI

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