

Draft Canterbury District Local Plan (2042/43) (Regulation 19) Consultation

Herne & Broomfield Parish Council response

The parish council is deeply dismayed that despite its previous objections these two sites identified for development within the parish have remained included in the plan.

Canterbury City Council had previously made assurances that no further significant development would be proposed for Herne & Broomfield, following the two major developments of Herne Bay Golf Course and Strode Farm. The size of the parish has already increased considerably, and another potential 250 dwellings will only compound the impact that these developments are making. It will also do nothing to improve community cohesion and only exacerbate the continuing erosion of the parish's village identity.

Policy HB9 – Land at Home Farm, Strode Park (Questions 33 to 36)

Do you consider that Policy HB9: Land at Home Farm Strode Park is sound? Please indicate your view on each of the following soundness tests.

The policy is positively prepared: No

The policy is justified: No

The policy is effective: No

The policy is consistent with national policy: No

HB9 does not meet the criteria for soundness.

The parish council has vehemently opposed any development on this site.

NPPF 11 d) i: the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed.

NPPF 11 d) ii: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

This site is outside of the urban boundary, without any local facilities or public transport provision.

The proposed development would not meet the needs of local people as much of it would be unaffordable, especially for young people.

There are serious questions regarding the deliverability of this development. Given the current level of development within the Herne Bay district there is a very real danger that supply will exceed demand, leaving homes empty and developments unfinished. This would have a detrimental impact on the completion of vital infrastructure, for example the Herne Relief Road.

NPPF 96 a): promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.

Community facilities are not stated as being planned for this site. The existing community facilities, and those proposed within Phase C of the Strode Farm Development, would not be readily accessible as they are situated in the centre of Herne Village. This would be detrimental to the facilitation of social interaction and ultimately increase social isolation.

NPPF 111 b): should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.

Bullockstone Road is not on an existing bus route, with the nearest available services a considerable distance away along Canterbury Road. As is apparent from other developments, the provision of bus stops does not equate to the provision of a bus service. Under current planning policies there is no requirement for developers to engage with bus companies to facilitate the provision of bus services. Delivering a service is a purely business decision made at the sole discretion of the bus companies. This results in car reliance and isolation for those that do not drive or have access to a vehicle. This is particularly true for secondary school aged children who attend a school outside of Herne Bay. To be sustainable the bus company would need to agree to provide a bus service.

NPPF 193 c): development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

NPPF 196 a): a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation).

This site is outside the urban boundary, adjacent to Bullockstone Hill Wood. The woodland borders the site on two sides and has designated Ancient Woodland status. Development at Home Farm would destroy the rural aspect and create disturbance to Bullockstone Hill Wood, a remnant of Blean Woods. This is an important feature, especially as Hares Wood has been destroyed with the widening of Bullockstone Road for the construction of the Herne Relief Road. There is also the possibility that construction at the toe of the hill could cause instability of the slope given the notoriously unstable nature of the London Clay subsoil. Extreme caution is required not to exacerbate such issues.

Policy HB10 – Land to the west of Bullockstone Road (Questions 37 to 40)

**Do you consider that Policy HB10: Land to the west of Bullockstone Road is sound?
Please indicate your view on each of the following soundness tests.**

The policy is positively prepared: No

The policy is justified: No

The policy is effective: No

The policy is consistent with national policy: No

HB10 does not meet the criteria for soundness.

The parish council has vehemently opposed any development on this site.

NPPF 11 d) i: the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed.

NPPF 11 d) ii: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

This site is outside the urban boundary in a rural setting, without any local facilities or public transport provision. The proposed development would not meet the needs of local people as much of it is unaffordable, especially for young people.

NPPF 96 a): promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.

Community facilities are not stated as being planned for this site. The existing community facilities, and those proposed within Phase C of the Strode Farm Development, would not be readily accessible as they are situated in the centre of Herne Village. It would also

necessitate crossing Bullockstone Road, which will become a significantly busier route once the Herne Relief Road is completed. This would be detrimental to the facilitation of social interaction and ultimately increase social isolation.

NPPF 115 b): safe and suitable access to the site can be achieved for all users.

It is proposed that the vehicular access for the site would be shared with that for Herne Bay Crematorium. This is totally inappropriate. The number of vehicular movements that 50 dwellings could potentially generate would have an enormous detrimental impact on the use of the crematorium. In addition, the disruption created by vehicular movements and noise during both the construction period and occupation of the site would cause considerable intrusion on mourners. There would also be the impact of crematorium traffic on access to the development.

NPPF 193 c): development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

This site is in an area of High Landscape Value, implying an assumption against development. Inclusion of this site would also be contrary to DS 22.

NPPF 196 a): a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation).

The land to the west of Bullockstone Road has a history of flooding due to its low-lying nature and proximity to several streams serving the Plenty Brook catchment area.