

23 September 2020

Canterbury City Council  
Military Road  
Canterbury  
Kent  
CT1 1YW

Dear Sir / Madam

## Canterbury City Council - New Local plan 2040: Issues Facing the District Representations on behalf of the Church Commissioners for England

We write on behalf of our client, the Church Commissioners for England ('the Church Commissioners'), which manages a well-diversified investment portfolio to support its work across the country. Deloitte Real Estate is instructed by the Church Commissioners to advise on planning matters in respect of its investment portfolio which includes a number of sites in the District of Canterbury. The Church Commissioners therefore has an interest in the formulation of planning policy at Canterbury City Council ('the Council') and welcomes the opportunity to respond to the New Local Plan 2040: Issues Facing the District consultation.

The consultation is part of the Council's preparation for the New Local Plan 2040 ('the Plan') which began in October 2019. The Plan will address the challenges of climate change and seek to improve the health and wellbeing of the community, including matters such as providing enough good quality and affordable housing; creating well-designed buildings and public spaces; and enhancing and preserving the historic and natural environment. Therefore, as part of this consultation, the Council is seeking views about these issues for the district from now to 2040.

### Background

The Church Commissioners previously responded to the Council's Call for Sites Consultation, which took place in June 2020. The Church Commissioners promoted a total of six sustainable sites ('the Sites') which are available and suitable for residential development. The table below sets out the Sites which were promoted and their approximate capacity.

Site Name	Site Capacity
Land at Drill Lane, Ickham	8 residential dwellings
Land at School Lane Paddock, Bekesbourne	8 residential dwellings
Land at Bossington Road, Adisham	6 residential dwellings

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Land at Wallend Farm, Upstreet	30 residential dwellings - 10 dwellings on the northern parcel and 20 dwellings on the southern parcel
Adisham Court Farm, Adisham	4 residential dwellings
Land at Hersden, Hersden	6 residential dwellings

## The Sites

### Land at Drill Lane, Ickham – Site 1

Site 1 is a greenfield site located to the rear of properties that front The Street (the main road through Ickham), measures 0.4ha and is accessed via Drill Lane to the north. To the south there is farmland and one residential property. Adjacent to Site 1, to the east and west, are residential properties. The land here is higher up than The Street. The village of Ickham lies to the south and is within a short walking distance. A bus stop is located approximately 170m south of Site 1. A Site Location Plan can be found at Appendix 1.

### Land at School Lane Paddock, Bekesbourne – Site 2

Site 2 is located within Bekesbourne, a small settlement with no defined centre. It is a greenfield site, comprising of undeveloped land and measures 0.33ha. School Lane forms the southern boundary and provides access. Site 2 forms part of a larger field which is currently used as a paddock. The western boundary abuts a row of 16 detached houses and a singular dwelling is located at the eastern boundary. The rest of the surrounding land is in agricultural use. It is within a short walking distance to Bekesbourne Train Station and the local village amenities. A Site Location Plan can be found at Appendix 2.

### Land at Bossington Road, Adisham – Site 3

Site 3 is a greenfield site forming part of a larger field and measures 0.28ha. It is located to the north of the village of Adisham, at the junction with Pond Hill and Bossington Road. The southern part of Site 3 is bounded by Pond Hill and Bossington Road, providing a strong boundary. To the east and south are residential properties and to the north is further fields. Site 3 is within a short walking distance to the local village amenities. A bus stop is located directly opposite of Site 3 and Adisham Train Station is located approximately 575m south. A Site Location Plan can be found at Appendix 3.

### Land at Wallend Farm, Upstreet – Site 4

Site 4 comprises two separate parcels of agricultural land. The northern parcel measures 0.7ha and the southern parcel measures 1.3ha, so approximately 2ha in total. Site 4 is located at the eastern extent of the village of Upstreet. Island Road / A28, which connects the Site 4 to Hersden and the wider Canterbury district, separates the northern and southern parcels.

The northern parcel of Site 4 is surrounded by agricultural fields to the north and east, with residential dwellings located to the west. The southern parcel is surrounded by agricultural land to the south and east, although there is a singular residential dwelling and outbuildings located at the eastern boundary. Grove Ferry Hill bounds the southern parcel of Site 4 at the western extent, with residential dwellings located beyond.

The surrounding area is typified mainly by detached residential dwellings with some semi-detached and terraced dwellings. The centre of the village of Upstreet is located approximately 500m east of Site 4,

which features a number of amenities. The next village of Hersden is located approximately 2.5km west and the City of Canterbury is located approximately 9.5km west of Site 4. A bus stop is located approximately 170m west of Site 4 and Sturry Train Station is located approximately 6.4km to the west. A Site Location Plan can be found at Appendix 4.

## Adisham Court Farm – Site 5

Site 5 is a brownfield site and measures 0.16ha. It lies to the south of Pond Hall and Adisham Downs Road, and lies to the north of the village of Adisham. One large agricultural building is situated on Site 5, which is suitable for conversion into residential units. Site 5 has a strong boundary to the north east guided by the local highway network. To the north and west are agricultural fields, and to the east are residential properties. Site 5 is within a short walking distance to the local village amenities. A bus stop is located approximately 217m south of the Site and Adisham Train Station is located approximately 775m south of Site 5. A Site Location Plan can be found at Appendix 5.

## Land at Hersden, Hersden – Site 6

Site 6 comprises agricultural land and measures 1ha. It lies centrally within the Local Centre (as defined in the adopted Local Plan) of Hersden. Island Road / A28 is located at the southern boundary and provides connections to Hersden as well as the wider Canterbury District. Site 6 is bounded to the north by agricultural land and to the south by a coppice and houses on North View road, from which there is pedestrian access to site 6. There is an existing access vehicular access from Island Road / A28 to the south via a gate.

Further fields are located directly to the northern boundary of Site 6, which have been allocated as a strategic development site 'Land North of Hersden' within the Canterbury District Local Plan for 800 dwellings and 1 ha of new business space for local business. This allocation will contribute towards the Council's aim of 4,000 dwellings, 70,000 sqm of employment floor space, community uses and infrastructure improvements to be delivered across all strategic allocations.

The surrounding area is typified by semi-detached residential dwellings with a few detached and terraced dwellings. Further south of Site 6 lies the Lakes View Business Park which is host to a number of large warehouses. A bus stop is located 20m from Site 6 and Sturry Train Station is approximately 3.62km away. A Site Location Plan can be found at Appendix 6.

## New Local Plan 2040: Issues Facing the District Consultation

This stage of consultation in preparing the Plan focuses on the issues for the district, as identified by the Council under the following topic areas:

- Housing and new communities;
- Local economy and employment;
- Movement and transportation;
- Town centres and local facilities; and,
- Historic and natural environment.

The following section discusses the topic areas which are of relevance to the Church Commissioners and its Sites.

## Housing and new communities

The Church Commissioners considers housebuilding to play a significant role in both the local and national economy. The COVID-19 pandemic has demonstrated the need for high quality homes in suitable locations more than ever before. Combined with the national housing shortage and the Government's intention to deliver more houses housebuilding will be pivotal in driving economic recovery. As such, heavy importance should be placed on increasing the delivery of new housing within the emerging Plan.

The Council note that the Plan will need to provide the number and type of homes to meet everyone's needs which are well designed and integrated within existing communities, with access to open space and community facilities. The Church Commissioners considers that achieving the housing delivery targets is of upmost importance, as failure to meet housing needs exacerbates unaffordability of housing. It can also lead to housing coming forward in undesirable and unsustainable locations. The Church Commissioners therefore urges the Council to consider allocating sites, such as the Sites, which can positively contribute to the Council's housing target in a sustainable manner, for residential development in the emerging Plan.

The Council need to continue to allocate land for residential development to address its housing need as well as maintain its five year land supply. In terms of delivery, the latest Housing Delivery Test (HDT) results for Canterbury show that the Council's delivery is 87% when compared with its target. Consequently, the Council is required to prepare an action for how it is going to address the under delivery of homes.

The Council's housing need, as identified in the adopted Local Plan (adopted 2017) was calculated based on a Housing Needs Review undertaken in 2015. The requirement was for 16,000 homes (800 dwellings per annum) to be delivered over the adopted Local Plan period (2011-2031). In accordance with the National Planning Policy Framework (NPPF 2019), the housing need should now be calculated using the standard method. Based on the current standard method, Canterbury's housing need requirement is approximately 1,120 dwellings per annum.

Since the publication of this consultation, the Government has published the Changes to the Planning System (August 2020) consultation which sets out a different approach to the standard method. The proposed new standard method calculates the housing need as 1,125 dwellings per annum. This demonstrates that current and proposed standard methods identify a housing need considerably higher than the figure set out in the adopted Local Plan 2017. As such, the Council will need to plan for this increase through more allocations.

The Sites promoted by the Church Commissioners to the previous Call for Sites consultation have a range of capacities for accommodating residential dwellings. The majority of the Sites are small with the capacity for between four and eight dwellings. The Church Commissioners suggest that when allocating sites for residential development in the emerging Plan, the Council should favourably view smaller sites in order to deliver a greater number of homes, as smaller sites are often built out relatively quickly. This is in accordance with Paragraph 67 of the NPPF, which requires planning policies to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. This includes identifying specific deliverable sites for years one to five of the plan period.

It was demonstrated in the submission to the Call for Sites consultation that the Sites are available and suitable to be delivered in the short-term. The Church Commissioners is the sole owner of the Sites and there are no physical constraints which cannot be appropriately mitigated. This will help the Council meet its housing delivery target as well as maintain its five year housing land supply.

Additionally, allocating smaller sites for residential development can positively contribute towards the NPPF's requirement that 10% of housing allocations in a Local Plan should be for smaller sites, less than 1 ha in size (Paragraph 68). Paragraph 78 of the NPPF also requires that small sites in sustainable, rural locations should be allocated whereby they contribute to promoting sustainable development in rural areas to enhance the viability of the community. As such, it is considered that five of the Sites can positively contribute to the Council's target of delivery on small, sustainably located, rural sites for housing, in accordance with the requirements of the NPPF.

The NPPF requires local policy to identify a sufficient supply and mix of sites for residential development. The supply of a large number of new homes should be supported by necessary infrastructure and facilities to meet identified need in a sustainable way (Paragraph 72). Site 4 is located within the village of Upstreet and it is bounded to the east and west by residential dwellings. As such, future development on Site 4 would act as a natural infill to the village. It is also relatively well connected with bus routes providing a sustainable means of travel and is located within close proximity to amenities and services within the village of Upstreet, including a post office, a public house and a car workshop. This demonstrates that Site 4 is situated in a sustainable location. Therefore, future development to provide a larger number of homes at Site 4 would accord with the NPPF's overarching objective of delivering sustainable development.

One of the Council's aims is to deliver a variety of different types of housing in the district to cater for the various communities. The Church Commissioners therefore, recommends that a flexible approach is adopted when determining the most suitable housing for each residential development site. The type of housing on each site should be determined on a case by case basis factoring in the surrounding context and the needs of the community. This allows for the most suitable type of housing to be delivered. This is in accordance with Paragraph 61 of the NPPF which states '*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*'.

In regards to the current context surrounding COVID-19, the Church Commissioners believes that demand for housing in rural settlements will increase as a result of remote working. It is evident that people are re-evaluating their living situations and opting for a greener environment with more space. The popularity of rural areas, migration from urban centres and second home ownership has increased the demand for rural housing and as such, has driven house prices up in rural locations. This can result in exclusion of local people who cannot compete therefore, a greater supply of housing in rural areas should be promoted. As such, the Church Commissioners considers that a more flexible approach should also be applied when applying the concept of a 'settlement hierarchy'. This would allow for a greater number of units to come forward in order to cater for the increased demand in rural houses.

Whilst at an early stage, this is also recognised within the Planning for the Future White Paper which proposes that land should be classed within one of three zones, being "*Growth*" areas, "*Renewal*" areas and "*Protected*" areas. For the Growth category specifically, it is proposed that this would include land suitable for comprehensive development, including new settlements and urban extension sites, as well as land at the edge of existing settlements. The Sites are all located within or adjacent to existing settlements therefore, development would act as natural infill or an extension to these settlements.

It is noted that the Council are aiming to create attractive, well-designed places in the emerging Plan. This is in accordance with Paragraph 124 to 132 of the NPPF which sets out that good design is a key aspect of sustainable development. Whilst the Church Commissioners support the Council's aim of creating well-designed places, the Church Commissioners urge the Council to appreciate that design is subjective and a

blanket approach should not be adopted. It is recommended that policy should recognise this and as such, the design of residential proposals should be considered on a site-by-site basis to not restrict development coming forward.

For housing and communities, the issue of climate change is of global importance and is essential in contributing to both local and national objectives for reducing carbon emissions. The Government has committed to reduce carbon emissions to net zero by 2050 and the Council has stated that the emerging Local Plan will need to reflect this. The Church Commissioners consider that the most appropriate way to prepare climate change policies is to allow for a degree of flexibility to ensure these policies are not too prescriptive. For example, it is often the case that small scale residential development can present constraints to implementing sustainable construction and renewable energy technologies in its design. Developing policies that recognise these constraints and allow for a more flexible approach to delivering climate change mitigation, will still allow sustainable development to come forward. As such, the Church Commissioners recommends that Council takes into consideration the scale and type of development when preparing more detailed policies to address climate change.

## **Movement and transportation**

It is noted that the Council is playing a proactive role in the delivery of electric vehicle charging point (EVCP) infrastructure across the district, and EVCPs are also being secured as part of new developments. The Church Commissioners consider that a flexible approach should be adopted when for EVCP provision in new developments. An EVCP will not be desired by each individual that occupies a residential development.

## **Historic and natural environment**

The Council recognise that new development will raise challenges for their historic and natural environment. It is stated that heritage is at the heart of the district's character and distinctiveness, and plays an essential role in delivering economic growth and prosperity. This is in accordance with Chapter 16 '*Conserving and enhancing the historic environment*' of the NPPF. The Church Commissioners support this aim and has delivered a number of developments in heritage sensitive areas. Therefore, the Church Commissioners has the experience to deliver residential development on sites within historic environments, such as a number of the Sites, whilst respecting the surrounding heritage.

In terms of policy within the new Plan, the Church Commissioners recommend that development is not prohibited in historic environments as development can often be designed to reflect the historic nature of a site's surroundings and enhance historic assets. Policy should recognise this and therefore allow an independent assessment of proposals on such sites, to establish the impact on the surrounding historic environment, ensuring key aspects of heritage assets are conserved and enhanced by the proposed development. This will maintain the historic environment, as well as allowing new development to come forward in accordance with Paragraph 190 of the NPPF which states '*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.*'

In terms of the natural environment, it is noted that the emerging Plan will provide opportunities to secure improvements to the natural environment, so that new developments leave the environment in a measurably better state through a mechanism known as "biodiversity net gain". The Church

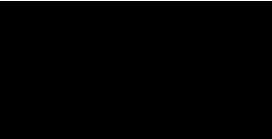
Commissioners understand the importance of conserving ecological networks in order to safeguard them in accordance with Chapter 15 '*Conserving and Enhancing the Natural Environment*' of the NPPF. This is evidenced by the Church Commissioners work across the country which has delivered a number of schemes in rural settings. It is suggested that a non-prescriptive approach to biodiversity net gain is accommodated within emerging policy.

## Conclusion

The Church Commissioners is pleased to have the opportunity to provide comments in relation to the Canterbury City Council New Local Plan 2040: Issues Facing the District consultation. The Church Commissioners is supportive of the key principles put forward and request that the Sites are considered for residential development in the emerging Local Plan. The Sites would make a valuable contribution to the housing supply in Canterbury and will aid the Council in meeting its housing target.

Should you have any queries on this correspondence, please contact myself or Jonathan Hoban   


Yours sincerely



**Caroline McDade**  
For Deloitte LLP

Appendix 1 - Land at Drill Lane, Ickham

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Appendix 2 Land at School Lane Paddock, Bekesbourne

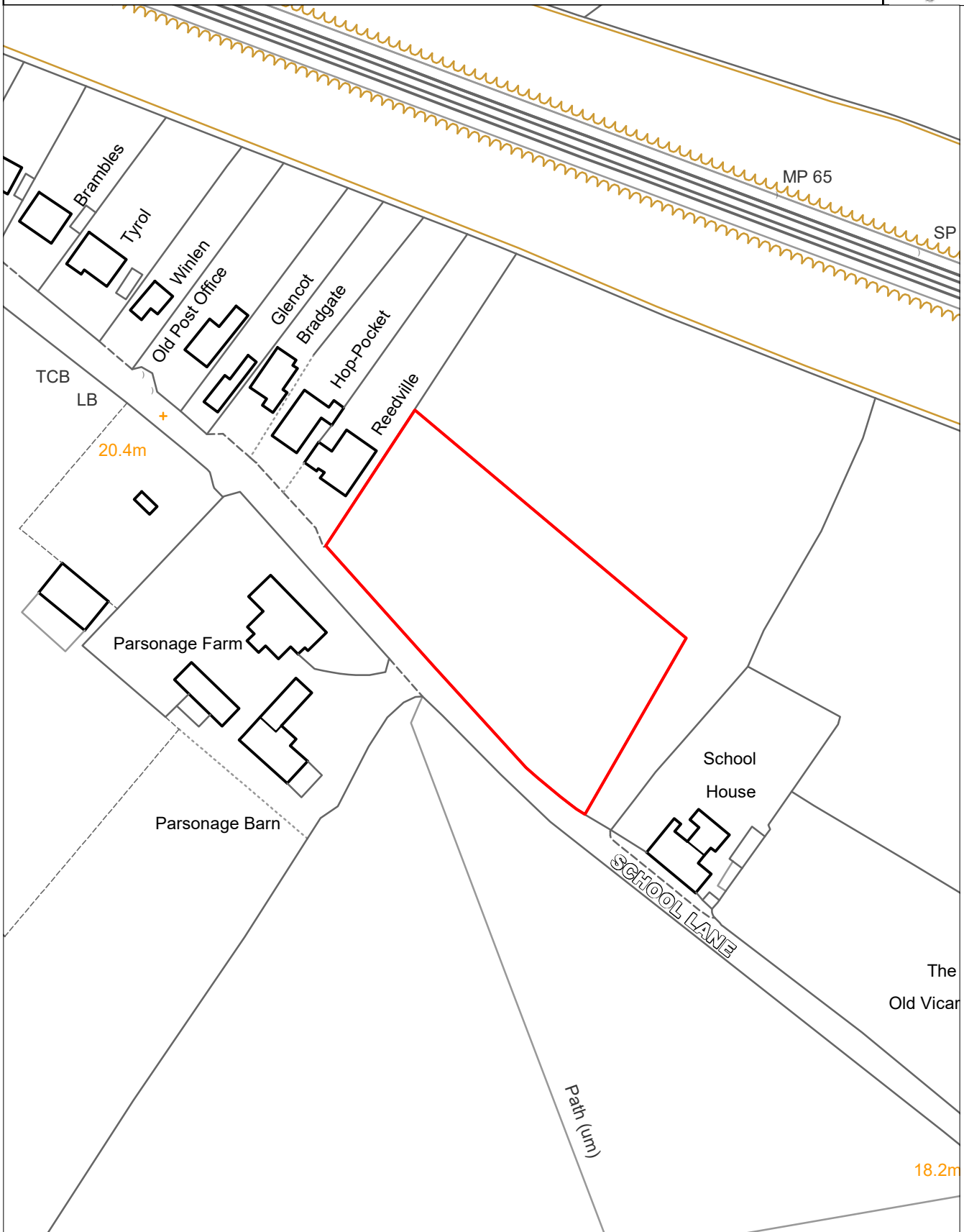
Date : 03 June 2020

Printed By : Charlotte Hall (CC Mapping)

Map Scale : 1:1250

Estate : Canterbury

Property : Land at School Lane Paddock, Bekesbourne



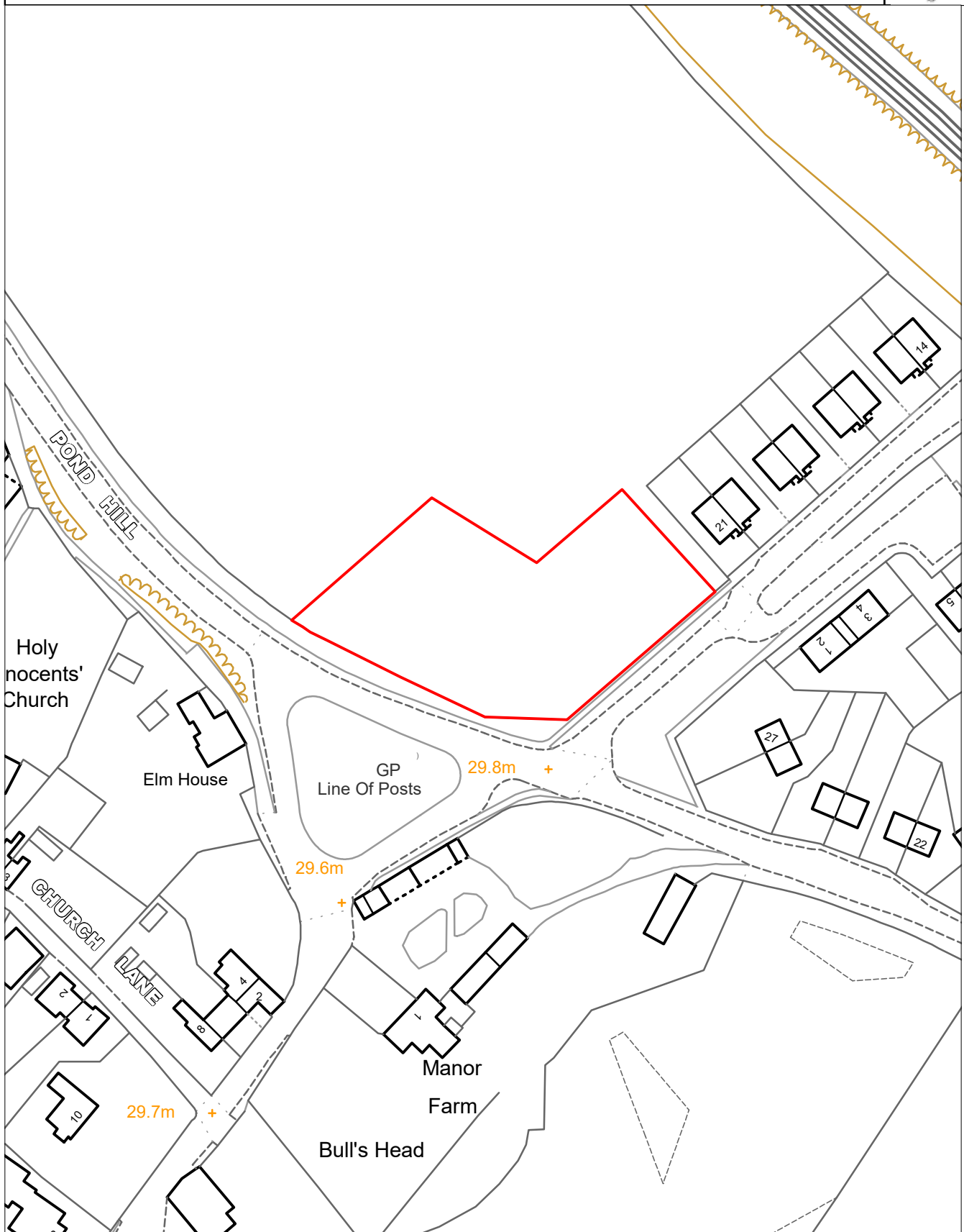
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Appendix 3 - Land at Bossington Road, Adisham;



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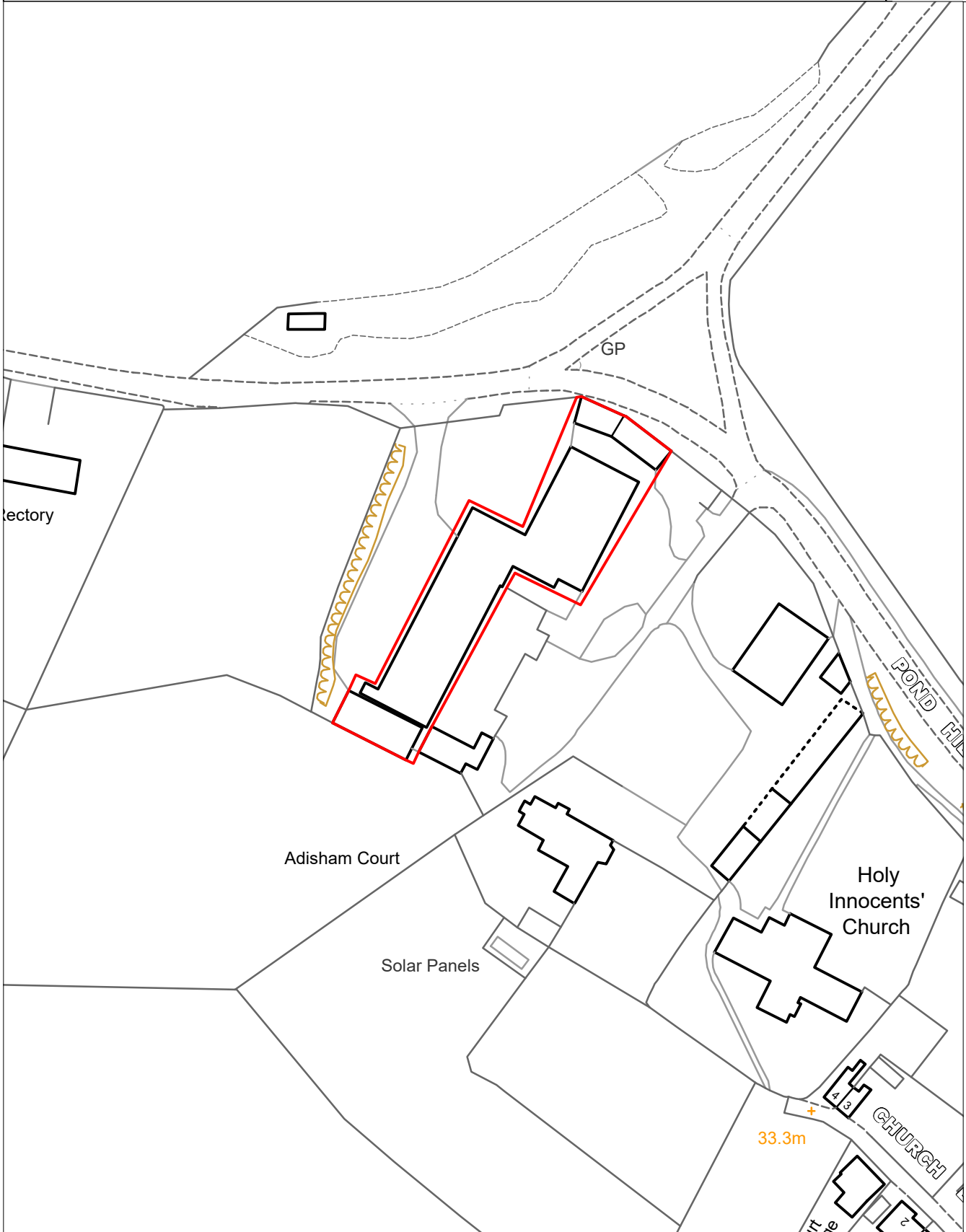
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Appendix 4 - Land at Wallend Farm, Upstreet



Appendix 5 - Adisham Court Farm, Adisham



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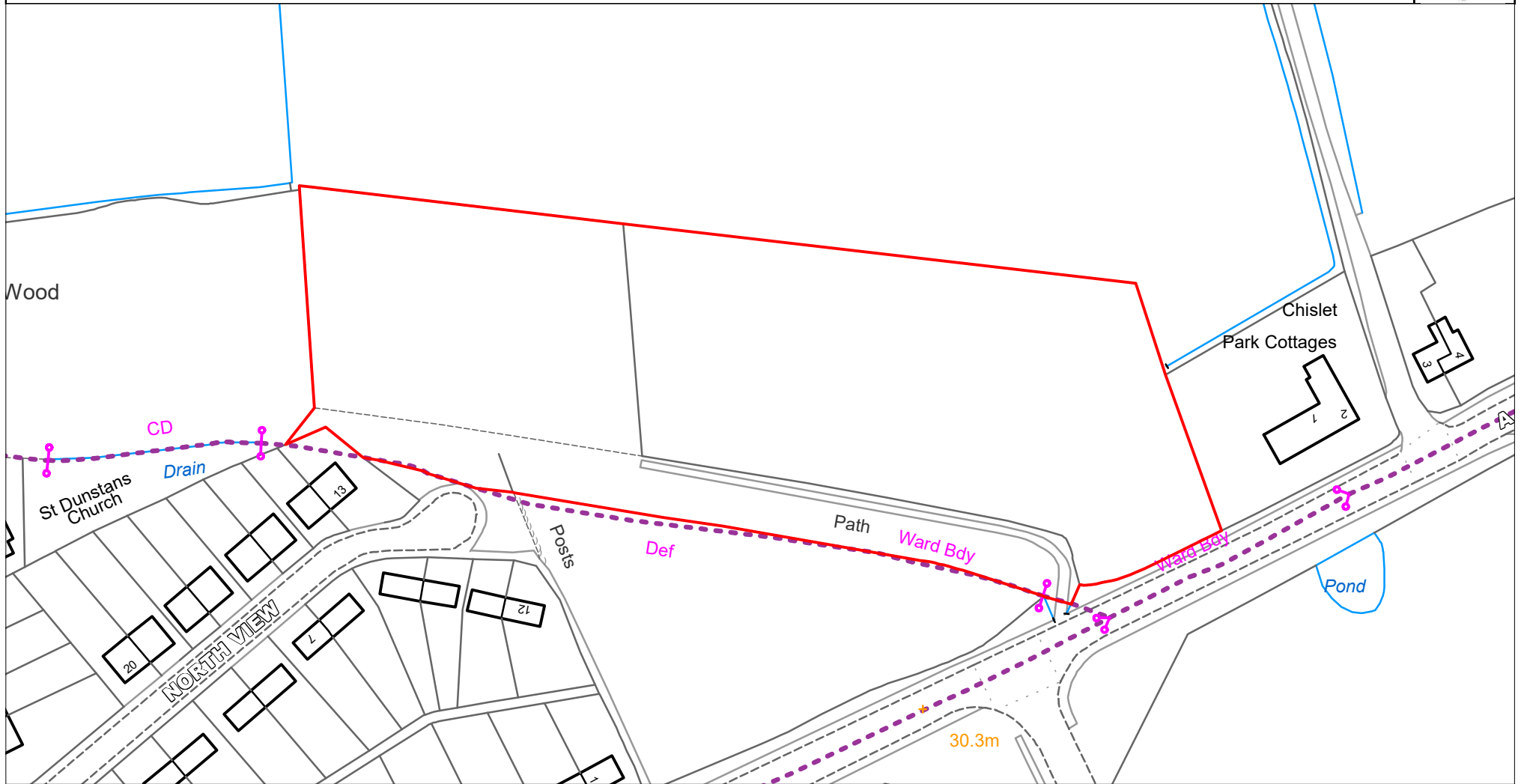
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Appendix 6 - Land at Hersden, Hersden

Date : 04 June 2020  
Map Scale : 1:1250  
Property : Land at Hersden

Printed By : Geraldine O'Donnell (CC Mapping)  
Estate : Canterbury



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