

Canterbury New Local Plan (2040)

Issues Survey Consultation- Autumn 2020



September 2020

CONTENTS

1	Introduction	4
1.1	Context	4
1.2	Plan Making	5
2	Legal Compliance	6
2.1	Duty to Cooperate.....	6
2.2	Sustainability Appraisal	6
3	National Planning Policy	8
3.1	National Planning Policy Framework.....	8
3.2	Planning Practice Guidance	10
3.3	Planning for the Future – White Paper.....	12
4	Issues Survey	13
4.1	Background.....	13
4.2	Housing and New Communities	13
4.3	Local Economy and Employment	17
4.4	Movement and Transportation.....	17
4.5	Town Centres and Local Facilities.....	18
4.6	Historic and Natural Environment	18
5	Conclusions	19

1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman welcome the opportunity to comment on the Canterbury New Local Plan 2040 Issues Survey 2020 Consultation and request to be updated on future consultations and progress of the Local Plan going forwards.
- 1.1.2 Gladman Developments specialise in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in the development industry. From that experience, we understand the need for the planning system to provide the homes and jobs that are required to meet Central Government's objectives and the needs of local communities.
- 1.1.3 Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Examinations in Public, including the Canterbury District Local Plan that was adopted in 2017.
- 1.1.4 Gladman has land interests in Canterbury City that are available, suitable and deliverable for residential development. Further details of those sites have been submitted to the Council separately in response to the Call for Sites exercise, which closed on 30th June 2020.
- 1.1.5 The Issues consultation provides an early opportunity to submit comments on key issues and areas to be addressed through the new Local Plan. This response includes comments on some of the key themes of the Issues document, including the need to address the issues of climate change and the need to provide enough good quality and affordable housing.
- 1.1.6 Gladman submit that the Council will need to carefully consider its policy choices and ensure that its proposed approach positively responds to the revised National Planning Policy Framework (2019). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system, as set out in the Ministry for Housing, Communities and Local Government (MHCLG) consultations on "Changes to the Current Planning System, August 2020" and "Planning for the Future, August 2020".
- 1.1.7 Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Canterbury City Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

2.1.3 The revised Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The revised Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

2.2 Sustainability Appraisal

2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process

¹ PPG Reference ID: 61-001-20180913

that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

- 2.2.2 The Canterbury New Local Plan 2040 should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Canterbury City Plan's decision-making and scoring should be robust, justified and transparent.

3 NATIONAL PLANNING POLICY

3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

3.1.2 The revised Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 16 of the Revised Framework (2019) states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

3.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

3.1.4 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.

- 3.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. It states:

"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period; and

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

- 3.1.6 Annex 2 of the Framework (2019) provides updated definitions for the terms "deliverable" and "developable". These are defined as:

'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'

'To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'

- 3.1.7 Once a local planning authority has identified its housing needs, these needs should be met as a **minimum**, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to AONB and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of

housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2019).

3.2 Planning Practice Guidance

5.1.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

5.1.2 The Standard Method was introduced by the Government to simplify the process of defining housing need, and avoid significant delay and debate experienced in plan preparation and at planning appeals.

5.1.3 The Standard Method is currently derived utilising a three-step process defined in PPG². This establishes that local authorities are to use nationally published household projections to determine the basis of their housing requirement, applying an upward adjustment (where necessary) in accordance with a predetermined formula to account for affordability problems. Where this approach results in a significant uplift over and above the previous housing requirement (an uplift of 40% or more on the existing OAN), a local planning authority is permitted to apply a cap to the housing requirement to that limit rather than adopt the total implied by the Standard Method.

5.1.4 PPG confirms the NPPF 2019 position that the Standard Method forms only the **minimum** level of housing need for a local authority area³. PPG also sets out that there will be circumstances where the housing requirement could be increased to a level which is higher than that identified through the application of the Standard Method⁴. These circumstances include (but are not limited to):

- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. housing deals);
- Where strategic infrastructure improvements are planned that would support new homes;
- Where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground;
- Previous delivery levels, where these have exceeded the minimum figure identified; and

² See PPG Ref ID: 2a-004-20190220

³ See PPG Ref ID: 2a-002-20190220

⁴ See PPG Ref ID: 2a-010-20190220

- Recent assessments of need, such as a SHMA, where these suggest higher levels of need.
- 5.1.5 Whilst the Standard Method provides the Government's preferred approach to defining the minimum level of housing need for each local planning authority, alternative approaches may be applied where justified by exceptional circumstances⁵.
- 5.1.6 Following the publication of the 2016-household projections by ONS in September 2018, the Government sought to review the Standard Method⁶. The review highlighted the Government's concerns with the 2016-projections, and in particular its failure to support the Government ambition to deliver 300,000 dwellings per year. The consultation culminated with updates to the Standard Method as introduced through revisions to PPG made on the 20th February 2019. Most significant of these updates is the confirmation of the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method⁷.
- 5.1.7 The Government is currently consulting on a new Standard Method in the document 'Changes to the Current System'. The Government proposes a Standard Method equivalent to 337,000 homes per year across Local Planning Authorities instead of the current 270,000. This way, the Government argues, the ambition of 300,000 homes per year is more likely to be met.
- 5.1.8 At this stage, Canterbury City should be planning to deliver at least 1,120 homes per year to fulfil the requirements of national policy. The Council should however keep this minimum requirement under review until such a time that the plan is submitted for examination.
- 3.2.1 It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. In this way, Gladman encourage Canterbury to fully consider the merits of planning for a housing figure beyond the minimum requirement of 1,120 per annum. For instance, an increased housing figure would enable Canterbury to capture a larger proportion of the £7 billion yearly housebuilder contributions⁸. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25⁹, it is also imperative that Canterbury's Local Plan identifies sufficient land to fully support the delivery of at least 1,120 dwellings per year.

⁵ See PPG Ref ID: 2a-003-20190220

⁶ See Technical Consultation on Updates to National Planning Policy and Guidance October 2018

⁷ See PPG Ref ID: 2a-004-20190220 and 2a-005-20190220

⁸ MHCLG (2020). 'Planning for the Future'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

⁹ Shelter & Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: https://england.shelter.org.uk/media/press_releases/articles/over_80,000_new_homes_will_be_lost_in_one_year_to_covid_chaos

- 3.2.2 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation's recommendation that local plan should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

3.3 Planning for the Future – White Paper

- 3.3.1 On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 3.3.2 Consultation is currently underway on these proposals and it will be important that the Council keeps abreast with the implementation of these changes to determine any potential implications for the Local Plan 2040.
- 3.3.3 Timescales remain uncertain however subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.
- 3.3.4 A further consultation is also underway on immediate changes to the current planning system¹⁰. Of significant note is a proposed revised standard method for calculating local housing need, which proposes to incorporate a percentage of existing stock as the baseline of the calculation. Once implemented, this will be used as the basis for plans created prior to any changes outlined in the White Paper. Under the proposed changes, Canterbury's minimum housing need would adjust to 1,125 dwellings per annum. It is noted that the housing need figure produced by the new methodology is relatively consistent with the existing standard methodology, and in either scenario the annual need exceeds the current adopted housing requirement by **at least 320 dwellings per annum**. This will require a step change in the amount of land identified for development when compared with the current plan.

¹⁰ Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

4 ISSUES SURVEY

4.1 Background

4.1.1 The Canterbury District Local Plan was adopted in July 2017, however national policy is clear that local planning authorities should review their plans at least every five years to ensure that they remain robust and up-to-date. The Council correctly accept that there is a need to undertake a review of the local plan due to changes in national policy- in particular the increased housing need compared to the adopted housing requirement. Gladman supports the Council's commitment to commence work on the new local plan and the timescales outlined in the Local Development Scheme 2019.

4.1.2 Gladman broadly supports the objectives for the new local plan set out within the consultation. It is considered that the need to provide enough good quality and affordable housing is of paramount importance, as well as the need to recognise the challenges of climate change and health and wellbeing which cut across all of the objectives identified.

4.1.3 The sections that follow below include specific comments from Gladman on the Council's Issues papers, covering a range of the topics and questions that have been posed.

4.2 Housing and New Communities

4.2.1 Gladman support the premise that it is important that everyone living in the district has a place to call home. We note that in 2019, the average house price in the district was more than 10 times average local earnings and that affordability is a key issue for many of the city's residents. This is reflective of the wider national housing crisis and the failure over several decades to deliver the requisite amount of housing to meet local needs. There is therefore an opportunity for the Council to grasp the nettle through this local plan, ensuring that sufficient housing is planned for in order to meet the needs of everyone in Canterbury. As outlined previously, it is therefore imperative that the Council, in bringing forward its draft plan, seeks to plan for **at least** the number of homes identified in the government's standard methodology. Gladman would further recommend that the Council include a 20% buffer in line with the recommendations of the HBF to ensure flexibility is provided for in the deliverable supply.

4.2.2 Gladman have been closely involved in the plan-making process in Canterbury for a number of years. Consistent with other national housebuilders and promoters with interests in the district, Gladman argued at the examination in public of the current Local Plan that an over-reliance on large scale strategic scale sites coming forward within the plan period would lead to issues with deliverability and potential market saturation. These fears have been well founded as several of the Council's large-scale allocations continue to be held up by issues relating to infrastructure and viability. Gladman recognise the role that strategic sites play in meeting the housing requirement, however it is absolutely crucial that the Council does not put all its eggs in one basket. In order to deliver choice

and competition in the market, significantly boost the supply of housing and ensure the deliverability of the plan as a whole, it is vital that the Council plans for a wide range of site sizes and locations to be allocated for residential development, including sites within the smaller sustainable settlements in the district. By distributing the proposed development in a more dispersed manner across the district, the Council will not only help to maintain and enhance the vitality and viability of settlements across the hierarchy, but they will help to relieve some of the pressure on the infrastructure of the larger settlements which has been evident for many years and has been, to some extent, exacerbated by the spatial strategy employed in the current plan. Smaller sites inevitably come with fewer infrastructure requirements. Furthermore, the Covid-19 epidemic has shown that with increased remote working, accessibility to main centres of employment will not necessarily be as important as building sustainable communities which people genuinely want to live in. Given the reduction in the need to commute, more people will undoubtedly wish to live in villages, with access to open spaces, for the purpose of their own health and wellbeing. The Council should recognise this shift in social attitudes in their emerging spatial strategy.

- 4.2.3 Gladman would also encourage the Council to consider the inclusion of flexible policies in their new local plan, which allow sustainable development to come forward outside of defined built up areas. While the Council's current local plan contains such flexible policies, they are not in our experience typically applied in such a flexible manner. A policy which explicitly allows development to come forward outside of allocated sites and built up areas would allow the Council to address short term supply shortfalls without the need to depart from the provisions of the development plan. However, it would still give the Council the flexibility to refuse development if they were to consider it was not sustainable.
- 4.2.4 Gladman agree with the assertion that housebuilding contributes significantly to the local economy, and the industry's role in aiding economic recovery from the effects of the Covid-19 epidemic cannot be underplayed. This further underlines the need to ensure that a sufficient quantum and breadth of sites are allocated to ensure that the economic opportunities are fully realised. Gladman would once again emphasise the need to ensure that the Council's spatial strategy for development ensures that the vitality and viability of all sustainable settlements is maintained and enhanced through planning for an appropriate amount of development in those settlements.
- 4.2.5 At this point, Gladman would like to draw attention to two specific strategic issues which have restricted housing development from coming forward in Canterbury in recent years and which have had specific effects on the sites which Gladman are promoting in the district. It is crucial that CCC work closely with their partners to ensure that these issues are resolved in order to allow the new local plan to be deliverable in the way that the current plan has proved not to be:

Sturry Relief Road

- 4.2.6 The Sturry Relief Road is a key piece of local infrastructure which was identified at the previous local plan examination as crucial to unlock strategic development sites at Hersden, Sturry and Broadoak. The intention was that the road scheme would be match funded by developer contributions, along with LEP funding and county council funding. At that examination, Gladman argued that the Council needed to be more realistic in its assumptions as to when infrastructure interventions were required and when they would come forward. The Council however were optimistic as to how quickly the relief road would come forward and with regard to the number of houses that could be delivered in advance of the road. In reality, the planning permissions for allocations required to fund the Relief Road have not yet been granted; as such, delivery on allocations which were anticipated to commence in 2018-19 is some way off, and the funding for the relief road is yet to be put in place. This is preventing other sustainable development from coming forward in addition to the allocations. As such, it is crucial that in planning for development in the new local plan, the Council is realistic about the need for infrastructure to support delivery of new homes, the viability of developer funding for such infrastructure, and the timescales for implementing it. This further underlines why the Council should also allocate additional smaller sites, which are not as impacted by infrastructure constraints, to allow for a contingency should larger scale sites not come forward as anticipated.

Nitrates and Phosphates

- 4.2.7 Natural England is currently objecting to a large number of planning applications in the Canterbury City Council area as a result of the potential for a cumulative likely significant effect on the integrity of the Stour Estuary SPA/SAC. The reason for this is that the Stodmarsh SSSI, which forms part of the wider European protected site, is currently experiencing a high level of nitrates and phosphates which has the potential to impact the integrity of qualifying species at this location. The Environment Agency is currently undertaking an investigation to establish the extent to which concentrations of nitrates and phosphates from effluent treated at the Canterbury Waste Water Treatment Works, which discharges into the Stodmarsh, are having an effect on these increasing nitrate and phosphate levels in the river. However, this investigation is not due to report until 2022, and if works are required at the treatment works to reduce the amount of nitrates and phosphates discharged from effluent, these works may not be completed until 2030 as a result of Southern Water's funding mechanism. In the interim, Natural England's position is that, applying a precautionary principle, all residential development may have a likely significant impact on the Stodmarsh, hence the blanket. This is affecting the Council's own allocations in the extant plan, alongside other development, and is preventing the Council from being able to meet the housing need in the area.
- 4.2.8 It is completely unacceptable that development is subject to an effective moratorium as a result of such an issue. In other parts of England where nitrates and phosphates have been an issue, such as the Solent, local planning authorities have worked closely with Natural England, the Environment Agency and sewage undertakers to ensure that a strategic solution is identified. For example in the

Solent, a scheme is being put in place where developers can pay into a strategic pot for agricultural land to be taken out of nitrate/phosphate intensive uses, effectively allowing the development's impact to be 'offsetted'.

- 4.2.9 Given the high bar of acceptability of likely adverse impacts associated with the Habitats Regulations, the impact of this issue on Canterbury's ability to meet its housing needs cannot be understated. It is therefore crucial that at this early stage in the plan process, the Council engages effectively with its partners in other public and private sector agencies, along with developers and promoters, to develop an effective, strategic solution which will allow the new local plan to be deliverable without having potentially significant environmental impacts. Gladman are keen to engage with the Council further on this issue and would invite the Council to arrange to meet with us to discuss our experience of this issue, and potential solutions which have been utilised in other parts of the country.

Meeting the needs of our communities

- 4.2.10 Gladman agree with the Council that it is important that the new Local Plan makes provision for different sizes and types of homes to meet the needs of all communities. It is important that in working up the draft plan, the Council has regard to current national policy in relation to meeting the need for different types of housing, and that any such requirements in the plan are supported by a robust evidence base in the form of a Housing Needs Assessment identifying the local need for all types and tenures of housing.
- 4.2.11 Similarly, Gladman agrees that the District Plan is a key mechanism for securing new affordable housing, particularly when delivered alongside large-scale market housing-led development. Again, it is important that in formulating policies to bring forward affordable housing, regard is had to a robust Housing Needs Assessment detailing both the need for affordable housing and the level at which it can be viably provided in the context of the local housing market.
- 4.2.12 Gladman agree that it is important the need for student housing is taken into account as additional to other types of housing, given it meets a specialist need. Care should be taken to ensure meeting this need does not reduce the level of open market and affordable housing.

Well designed places

- 4.2.13 Gladman fully supports the ambition of the Council to ensure that housing which is brought forward is well-designed, which reflects a key ambit of current national policy. It also reflects many of the initiatives being brought forward in the current Planning White Paper, stemming from the *Building Better, Building Beautiful* report. Gladman agree that well-designed development can have a positive

impact on health and wellbeing. It can help to ensure that new development, which is required to meet local housing need, is nevertheless a positive addition to communities which can be supported by the local population.

4.2.14 It is recognised that the district, like many areas of the country, has an ageing population and it is therefore important to ensure that the need for speciality housing for older people is assessed and planned for. Gladman looks forward to contributing further when specific proposals are brought forward.

4.2.15 Gladman agrees that the provision of open space is an important part of development. It is also recognised that proportionate financial contributions towards infrastructure provision are often a requirement of new development; the Council's recent adoption of CIL provides an opportunity for the Council to generate funding for infrastructure and this will need to be reviewed to take into account the new plan.

Adapting to climate change

4.2.16 Gladman agree that new development plays a key role in addressing climate change issues and we recognise that development which comes forward must take these issues into account and must be resilient to future change.

4.2.17 Gladman look forward to engaging further with the Council on these issues when specific proposals are brought forward.

4.3 Local Economy and Employment

4.3.1 Gladman agrees with the Council as to the strength of the local economy. It is important that to maintain this strength going forward, the Council plans to provide enough housing to support the economic aspirations of the district and Gladman look forward to working with the Council on this as further detail is brought forward.

4.4 Movement and Transportation

4.4.1 Gladman agrees with the Council that it is important that transport infrastructure issues are addressed to ensure that development can be brought forward in a sustainable manner. However, it is important for the Council to recognise that in line with national policy, sustainable transport opportunities vary from urban to rural areas. This must be recognised alongside the need to ensure the continued vitality and viability of rural settlements. The Covid-19 epidemic has shed light on the opportunity for more employees to adapt to home-working, as highlighted by the Council, and it is important that this is also taken into account in formulating the strategy for development in the period to 2040.

4.5 Town Centres and Local Facilities

- 4.5.1 Gladman support the concept that rural settlements often act as hubs, providing facilities to a network of smaller settlements nearby. We agree that the new local plan should provide a strategy to support these networks and the services within them, particularly by planning for new development at these locations to ensure that there continue to be opportunities for local young people and families to live in these areas.

4.6 Historic and Natural Environment

- 4.6.1 Gladman support the general assertions made in the Issues document regarding the protection and enhancement of the historic and natural environment. It is important that in formulating more detailed policies, the Council has regard to the provisions of national policy and Gladman look forward to commenting further at the next stage of the plan process.

5 CONCLUSIONS

- 5.1.1 Gladman welcomes the opportunity to comment on the issues and options that are currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2019) and the associated updates that were made to Planning Practice Guidance. It should however be noted that since the start of this consultation, the Government has published its own consultation on 'Proposed changes to the current planning system, August 2020' as well as on wider proposals for planning reform, through the 'Planning for the Future White Paper, August 2020'. The Council will need to explore the extent to which the proposed changes may impact on the timing and content of the new Local Plan in due course.
- 5.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 5.1.3 The Council should be planning to meet the local housing needs calculated using the Government's standard method as a minimum. It will also be necessary to fully explore whether there any unmet needs arising from neighbouring authorities. Cross boundary issues should be fully explored, and Statements of Common Ground produced, maintained and updated throughout the plan making process in order to ensure that wider than local matters are fully explored and considered through the new Local Plan.
- 5.1.4 The spatial strategy for the Local Plan Review should further embrace the opportunity to support the sustainable growth of settlements across the hierarchy, to complement the identification of further large-scale strategic growth areas in addition to those already planned for. It is vital that the Plan enables sustained and consistent delivery throughout the plan period. The Council should also take on board the Home Builders Federation's recommendation to provide a 20% buffer of deliverable sites above the requirement in order to provide flexibility and maximise delivery against housing needs over the plan period.
- 5.1.5 Gladman are promoting a number of sites in sustainable development locations within Canterbury City, that are available and deliverable. Specific details of those sites have been provided through the call for sites exercise that closed on 30th June 2020.
- 5.1.6 Gladman look forward to being provided the opportunity to engage further with the Council regarding our land interests as the new Local Plan further progresses.