

30 June 2021

Canterbury City Council
Military Road
Canterbury
Kent
CT1 1YW

Dear Sir / Madam,

Canterbury City Council – New Local Plan 2040: Draft District Vision and Local Plan Options Consultation 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 LLP 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 Draft District Vision and Local Plan Options Consultation ('the 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. As part of the consultation, the Council is seeking views on the preferred options for the District.

Background

The Church Commissioners initially responded to the Council's Call for Sites Consultation in June 2020 and promoted six sites, which were 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

In September 2020, the Church Commissioners responded to the Council's New Local Plan 2040: Issues Facing the District Consultation. The Church Commissioners continued to promote the above Sites and supported the key principles put forward in the consultation subject to a number of suggestions.

To confirm, the following sites (collectively known as the "Sites") are still available and suitable for residential development to support the Council's vision for the Plan:

- 1) **Land at Drill Lane, Ickham (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.
- 2) **Land at School Lane Paddock, Bekesbourne (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.
- 3) **Land at Bossington Road, Adisham (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.
- 4) **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.

- 5) **Adisham Court Farm (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.
- 6) **Land at Hersden, Hersden (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. A Site Location Plan can be found at Appendix 6.

Draft District Vision and Local Plan Options Consultation

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

- Draft Vision and Growth Options
- Town Centre Strategies
- Housing and New Communities
- Employment and the Local Economy
- Town Centres and Local Facilities
- Movement and Transport
- Historic and Natural Environment
- Sustainability Appraisal

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

Draft Vision and Growth Options

The Council has set out that the draft vision for the district will be focused on building a stronger and resilient economy; centring growth and investment in Canterbury; supporting good health and wellbeing in its communities; and improving connectivity with good public transport to the city and beyond.

The consultation sets out potential growth options for the district, with the preferred option focusing growth on Canterbury to take advantage of the economic potential found in its heritage and universities. This option also limits development in coastal towns and villages. Whilst the Church Commissioners support the growth of urban areas, an approach that concentrates development in such areas can restrict the variety of housing choice that is available to come forward due to the constraints often associated with urban locations. This could result in an under-delivery of housing choice to meet the needs of different communities, especially communities located within rural areas. As such, this would not accord with Paragraph 67 of the NPPF which requires planning policies to identify a sufficient supply and mix of sites.

The Church Commissioners requests that the Council recognises that living in urban areas is not for everyone and that people should have a choice in where they chose to live. Rural communities for example have their own housing needs which need to be recognised. Focusing development in urban areas has the potential to push a large proportion of people into living in an urban environment, which may not be sustainable. This can also lead to negative social and physical impacts on the urban environments themselves by contributing to unsustainable increases in property values and lifestyle costs, as well as pulling investment from more suburban/rural areas. Additionally, as a result of the COVID-19 pandemic, there has been an increasing trend of people moving away from urban locations as they look for home office and garden space, more commonly found in suburban and rural settings. So, fewer people are choosing to live in central urban locations. As such, the Church Commissioners suggest that, in the emerging Local Plan, the Council should make it clear that major developments are directed towards urban areas/edge of urban areas. However, the Council should not use this to prevent sustainable sites within settlement boundaries or adjacent to settlement boundaries from coming forward.

The Council does identify another growth option as focusing growth in sustainable rural areas, with some growth at villages and hamlets, and more limited growth at Canterbury, Whitstable and Herne Bay. The Church Commissioners considers that housing located in rural areas has an important role to play in delivering sustainable development. In rural communities, housing supply is often limited therefore an approach whereby Council's focuses on providing much needed housing in these rural communities is supported by the Church Commissioners, particularly given the rural setting of its Sites. As such, the Church Commissioners encourage the Council to promote sustainable sites in rural settings, such as the Sites, for residential development in accordance with Paragraph 78 of the NPPF. This will give the Council a variety of new sites and enable more sites to be developed to help it meet its housing need.

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 itself and the resulting new homes 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.

Housing need

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. Using the standard method (published 2020), Canterbury's housing requirements has increased to 1,120 dwellings per annum. As such, the Council will need to plan for this increase through more allocations. The Sites promoted by the Church Commissioners in response to the Council's previous consultation opportunities have a range of estimated capacities for accommodating residential dwellings.

The Sites are small with the capacity for between four and eight dwellings each. Combined, these provide a significant contribution towards meeting the Council's increased housing requirement target.

It was demonstrated in the Church Commissioners response to the Call for Sites consultation that the Sites are available and suitable to be delivered in the short-medium 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.

Housing Type and Mix

In terms of the type and size of housing needed in the borough, the Church Commissioners is mostly supportive of Option HNC1A which proposes to allow some flexibility for developers to provide a mix of homes within a broad range. Local communities across Canterbury have different requirements when it comes to the type and size of housing needed. Therefore, adopting a flexible approach, as opposed to a blanket approach across the borough, will allow for a greater number of sites to come forward and a variation 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"*.

The Church Commissioners is strongly supportive of the Council's preferred option (Option HNC2C) which seeks to maximise opportunities for small and medium sites for the delivery of new housing. This objective is in accordance with Paragraph 67 of the NPPF, which includes identifying specific deliverable sites, such as the Sites, for years one to five of the Plan period. The Council should not discount the delivery of small sites as whilst larger sites can deliver more houses, smaller sites are often built out much more quickly.

In addition, 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). Additionally, allocating small sites in sustainable, rural locations can contribute to promoting sustainable development in rural areas to enhance the viability of rural communities, as required by Paragraph 78 of the NPPF. The Sites could positively contribute to the Council's target of housing delivery on small, sustainably located, rural sites.

Housing Densities

In making sure that the right densities are delivered in developments across the district, the Church Commissioners supports Option HNC4A which continues with the existing approach in the current Local Plan, where the capacity of a site is influenced through good design. In accordance with Paragraph 124 to 132 of the NPPF which sets out that good design is a key aspect of sustainable development, this option acknowledges the importance of design-based policies in determining the acceptable quantum of development to be delivered on a site. The Church Commissioners suggest that this approach is carried forward to the next Local Plan as this will allow for a continuation of a policy-led approach to design and

highlights the importance of making effective use of land. This is in accordance with the Paragraph 117 of the NPPF which states *“planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses”*.

The Council’s preferred option for identifying acceptable densities is Option HNC4C which sets out specific densities or a range of densities for areas of the district to make the best use of land i.e. higher density development would be required on sites at or close to town centres, than for sites in rural areas. Although the Church Commissioners is not opposed to the Council setting out appropriate density ranges, it suggests that the Council does not adopt an overly prescriptive approach and that sites are assessed on a case-by-case basis. Incorporating a degree of flexibility into any future policy can help increase the densities of sites through good design, as the Church Commissioners have had to do elsewhere. If densities are too prescriptive this can prevent new development coming forward where viability is a concern.

Rural Housing

When ensuring housing is provided for rural communities, the Church Commissioners generally supports the Council’s preferred option of supporting housing development at and next to rural services centres, local centres and villages. The Church Commissioners considers this option would provide much needed housing for rural communities as they look to expand as a result of the COVID-19 pandemic and the increased demand for housing in rural settlements. 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 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 supports an approach where more rural housing development, including infill development, can come forward and is supported on sustainably located sites, such as the Sites, to provide a valuable contribution towards the Council’s housing delivery target.

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 owned by the Church Commissioners are all located within or adjacent to existing settlements therefore, development would act as natural infill or an extension to these settlements.

Movement and Transport

The Church Commissioners supports the Council’s commitment to reducing greenhouse gas emissions as a result of transport and recognises the role that electric vehicles will play in reducing local air pollution. The Council’s preferred option (Option MT3B) for supporting the transition to zero emissions vehicles would result in all off-street parking spaces in all developments to have ‘active’ Electric Vehicle Charging Points (EVCP). The Church Commissioners asks the Council to consider that not every person/s who acquires a new residential property will require an electric vehicle charging point. As such, a requirement for infrastructure provision to allow for charging points to be installed by a future occupier would be much less restrictive and allow more development to be delivered. In addition, the infrastructure to deliver such a requirement can be costly and, although the use of electric vehicles is growing, the demand may change and switch to other forms of renewable energy such as hydrocarbon. This would directly impact the

provision of EVCPs in new development. Therefore, the Church Commissioners requests that emerging policy is flexible in its requirements for this type of infrastructure to be delivered to cater for changes in new technology coming forward.

In terms of parking standards, the Church Commissioners supports Option MT4B which would remove parking standards and adopt a more flexible approach to specific sites. This will allow the Council to consider a site's context and location, and based on this, assess its subsequent need for car parking provision. The Council's preferred option (Option MT4C) would amend the current parking standards to significantly reduce car parking in the most sustainable locations. The Sites are all located in rural settings, within close proximity to local services and facilities and public transport options. Therefore, the Sites are considered sustainable. Despite this, future residential development at the Sites would need to accommodate a degree of car parking provision as although the immediate area can provide several services and amenities, surrounding larger villages and towns provide a greater range of services and facilities. These areas might not be as accessible by public transport or walking / cycling so a car would still be required. Therefore, the Church Commissioners suggests that to identify acceptable parking standards for a development, this is done on a case-by-case basis at the planning application stage and takes into consideration the sustainability as well as surrounding characteristics of the site.

Historic and Natural Environment

In terms of policy within the emerging Plan, the Church Commissioners requests 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 Council's preferred option (Option NE3C) increases the requirement for new development to deliver biodiversity net gain from 10% to 20%. The Church Commissioners understands 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; and supports the Council's intent of delivering 20%, however this should not be at the expense of allowing sustainable sites that can only deliver 10%, as per government guidance, to come forward. The Church Commissioners has a track record of delivering biodiversity net gain on development sites in rural locations and therefore encourages the Council to ensure that there is flexibility for developers when delivering new development. An approach whereby a certain percentage of biodiversity net gain should be achieved through on-site provision may restrict otherwise sustainable development from coming forward, depending on the size of the site.

Two of the Sites (Adisham Court Farm and Land at Bossington Road) owned by the Church Commissioners are located in the in the North Downs Local Landscape Designation (LLD). It is noted that the Council's preferred option (Option NE4F) removes a large portion of the Area of High Landscape Value in the south of the district whilst Adisham is still included. The Church Commissioners suggest that a more flexible approach to these boundaries is considered as not all areas identified within the revised boundary will have the same level of contribution towards the landscape area. A more flexible approach whereby the impact of development of these landscape areas is assessed on a site-by-site basis, rather than blanket approach, would allow more sustainable development to come forward. Developments through good design can also enhance such settings.

Summary

The Church Commissioners is pleased to have the opportunity to provide comments in relation to the Canterbury City Council Draft District Vision and Local Plan Options Consultation. The Church Commissioners is broadly supportive of the key principles put forward 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.

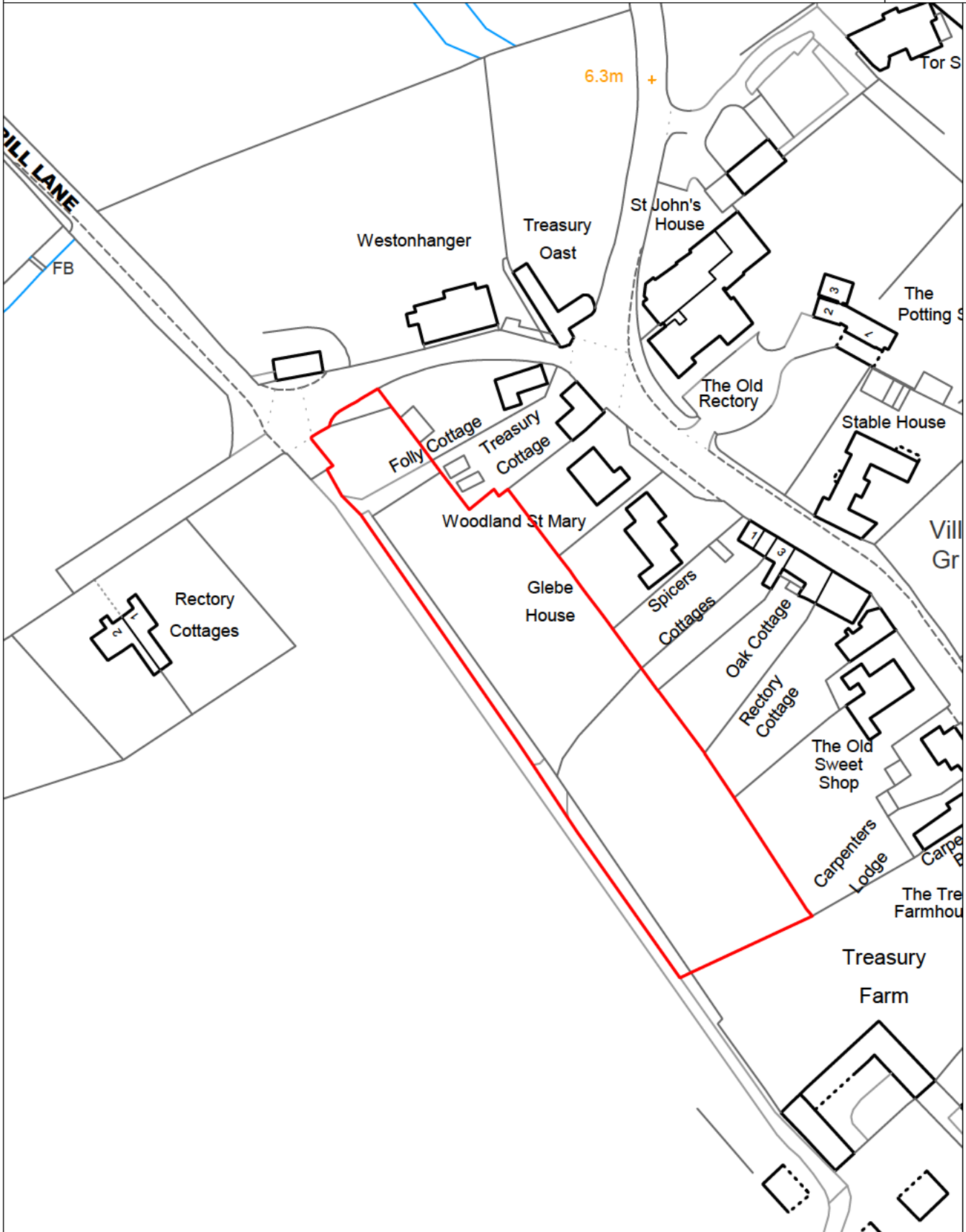
Should you have any queries on this correspondence, please contact Jonathan Hoban on [REDACTED] or [REDACTED].

Yours sincerely

[REDACTED]

Deloitte LLP

Appendix 1 – Land at Drill Lane, Ickham

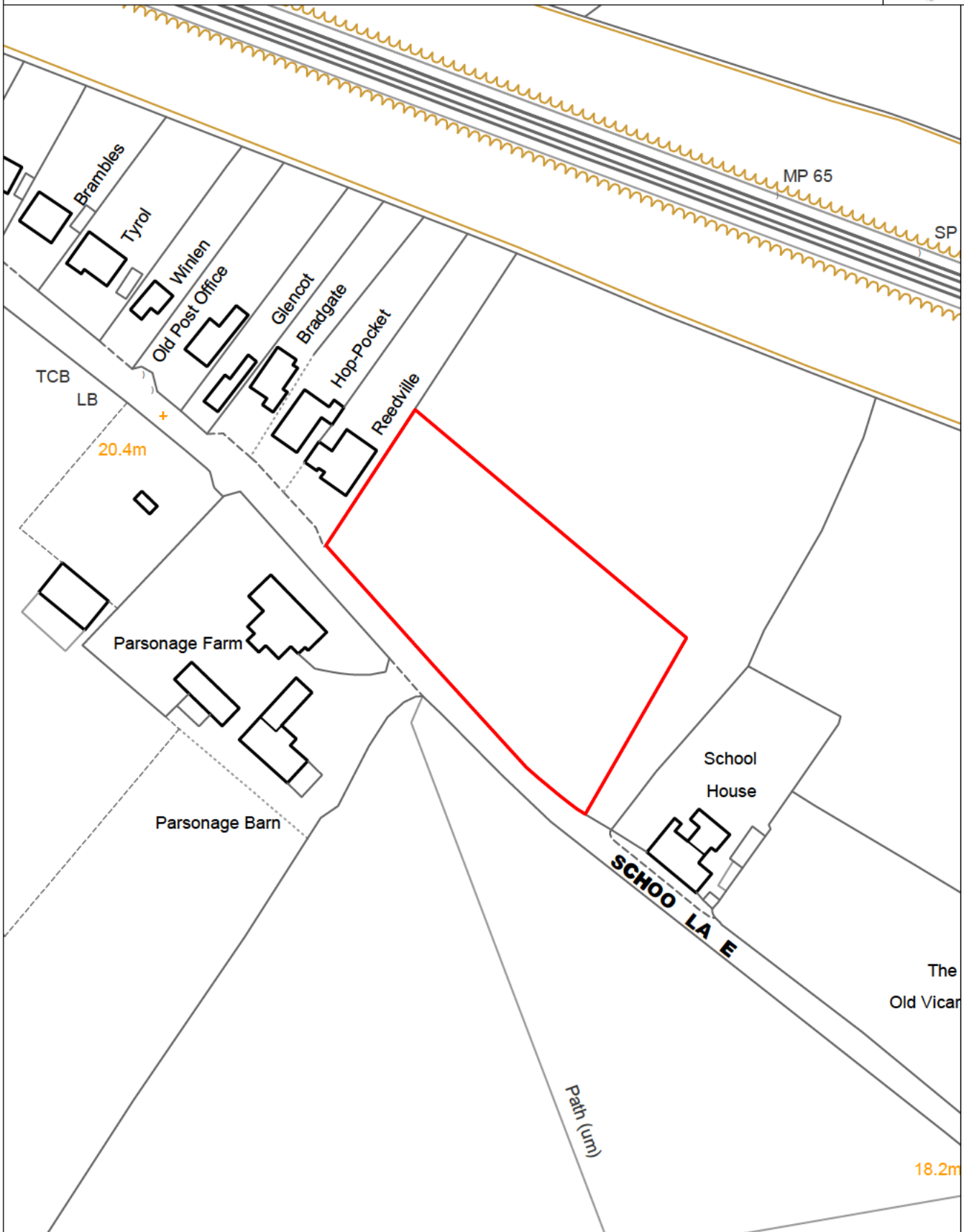


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Appendix 2 – Land at School Lane Paddock, Bekesbourne



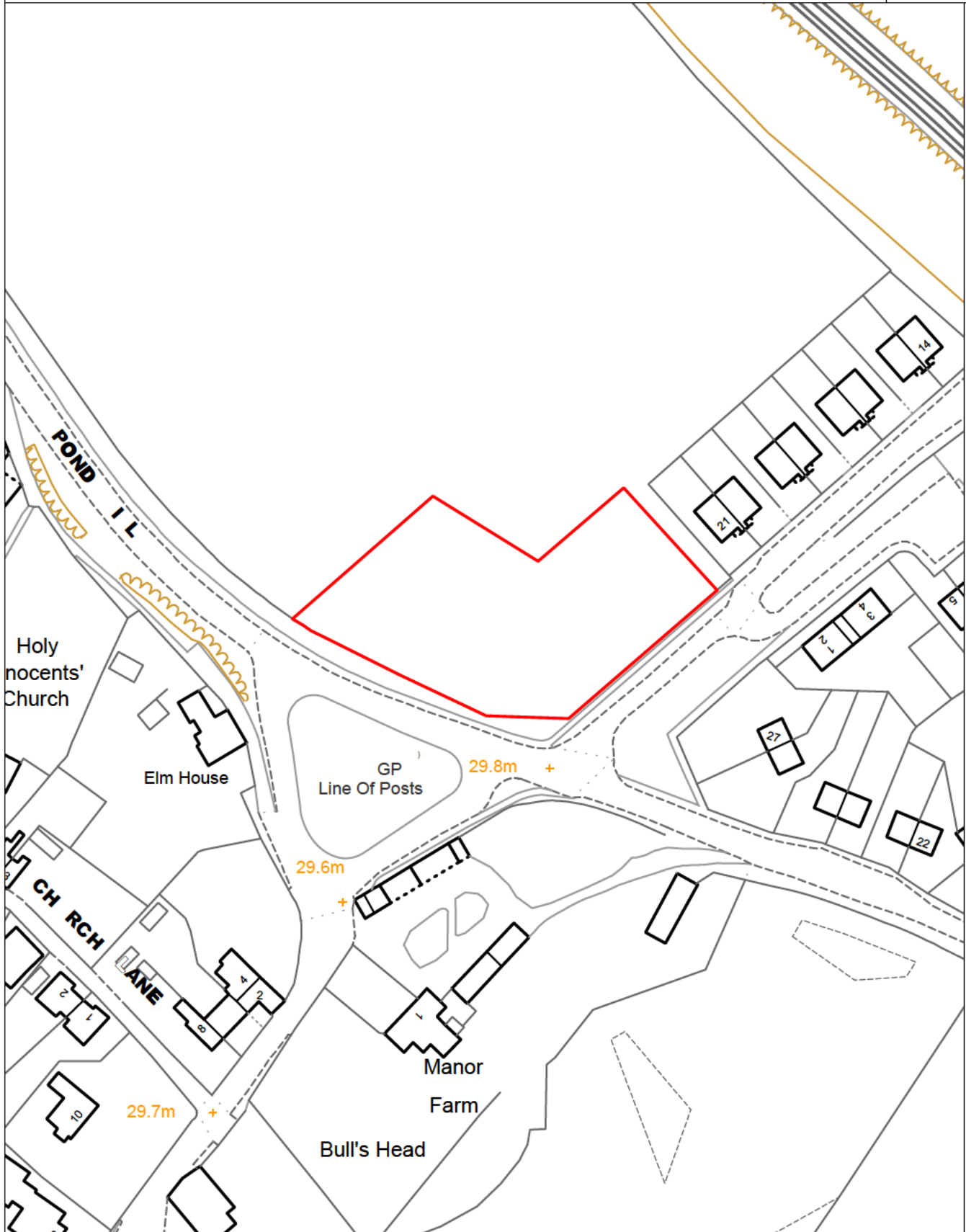
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Appendix 3 - Land at Bossington Road, Adisham



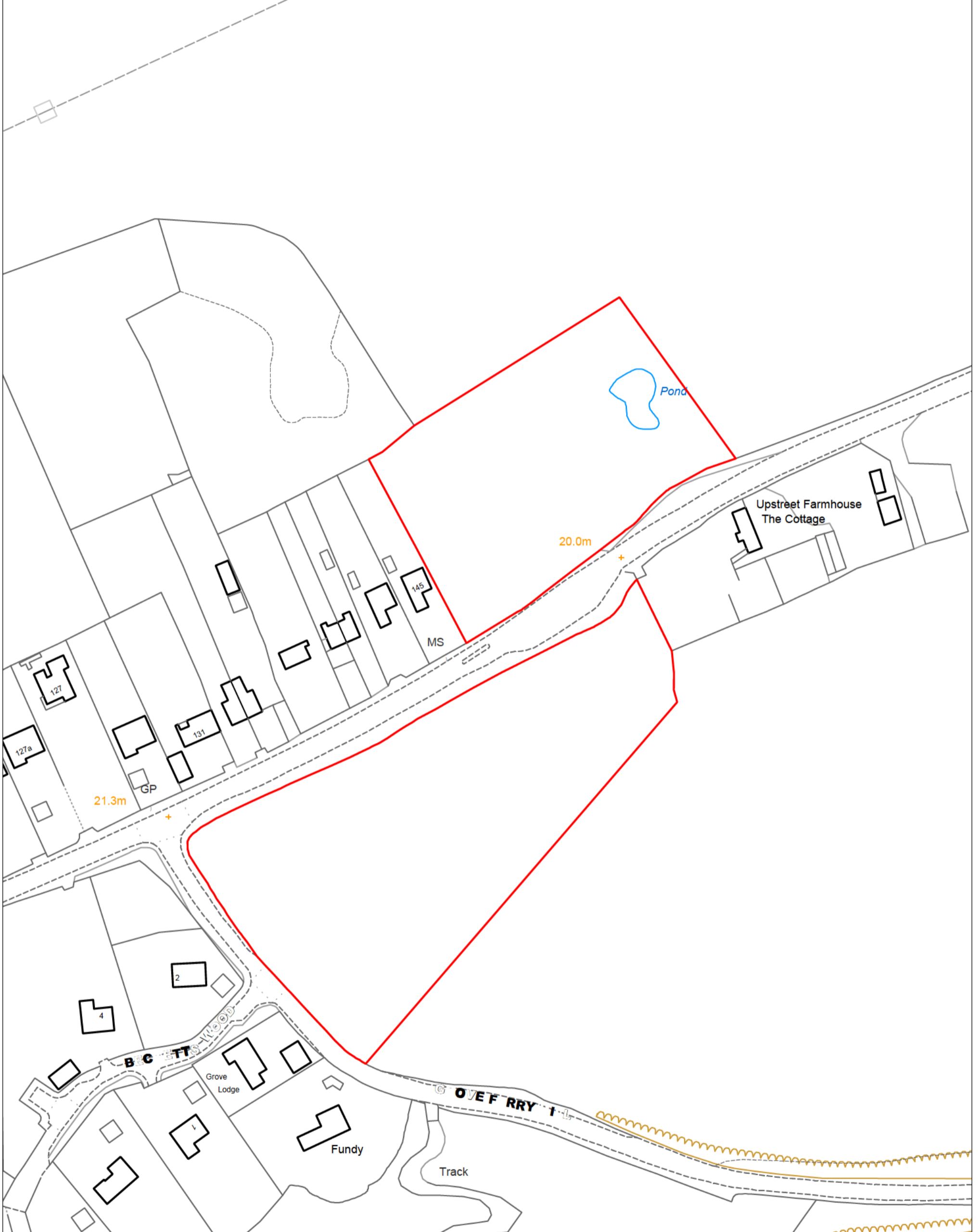
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Appendix 4 – Land at Wallend Farm, Upstreet

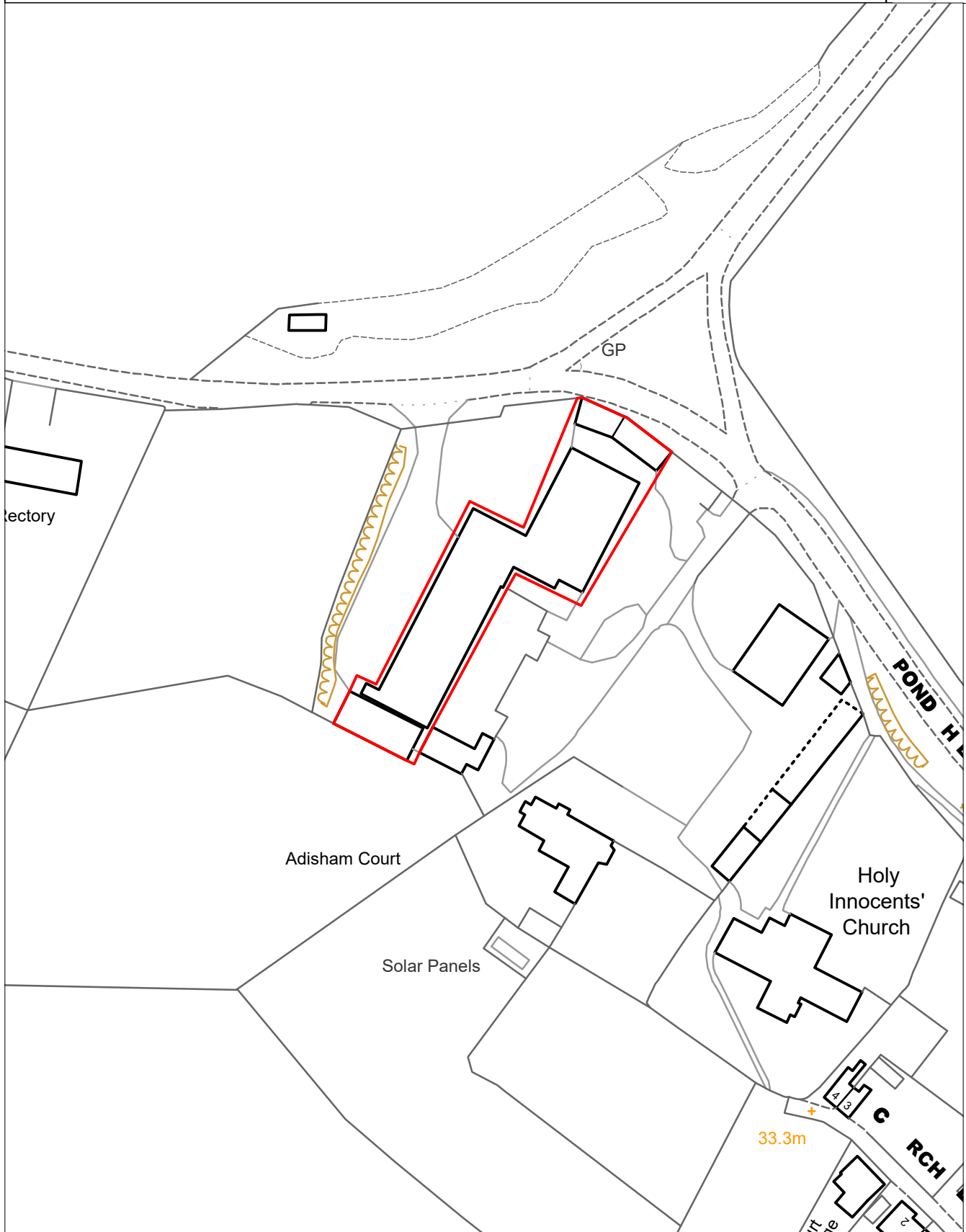


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Appendix 5 – Adisham Court Farm



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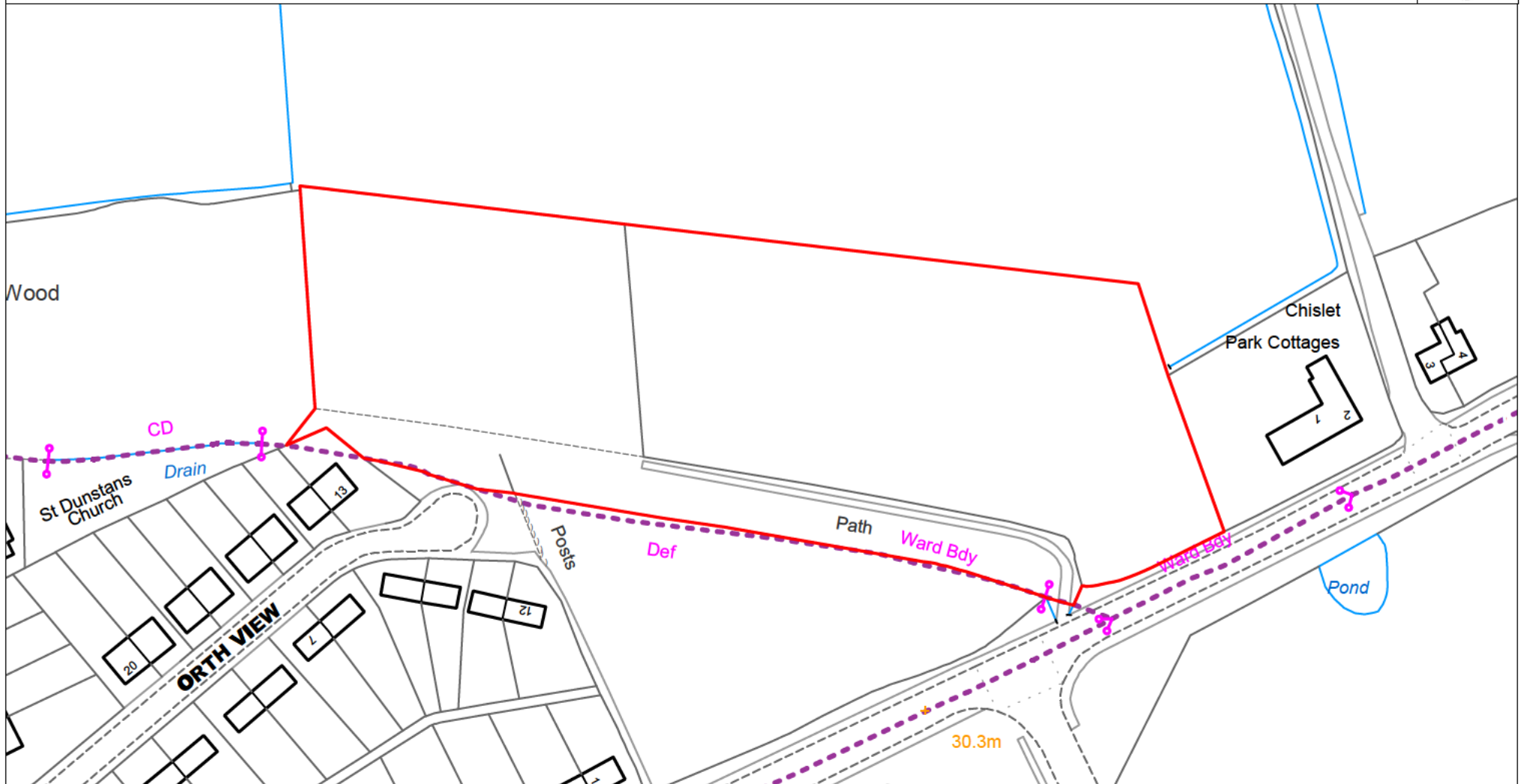
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Appendix 6 – Land at Hersden

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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