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**Canterbury City Council Local Plan
Draft Vision and Options Consultation and Call for Sites Addendum**

**Land to the north of the Railway Line and to the south of Bekesbourne Lane,
Canterbury (SLAA105)**

On behalf of FC Stark (Billings Group)

August 2021 – DHA/15874



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Appendix 1: Illustrative Site Layout Plan

1 Introduction

1.1 Overview of this Representation

- 1.1.1 This representation has been prepared on behalf of FC Stark (Billings Group) in response to the Canterbury City Council Draft Vision and Options consultation, which runs until 9th August 2021.
- 1.1.2 FC Stark (Billings Group) controls 'Land to the north of the Railway Line and to the south of Bekesbourne Lane, Canterbury' and is promoting the site for residential allocation as a part of the Canterbury Local Plan Review process.
- 1.1.3 The site has already been submitted within the first Call for Sites (summer 2020) and assigned site reference SLAA105 ahead of the Strategic Land Availability Assessment, anticipated to be published later this year. However, since the call for sites process closed, our client has secured the option to promote a further piece of land to the north west of the SLAA105 site. As such, the land available now forms a larger proposed allocation.
- 1.1.4 Notwithstanding the boundary change, the purpose of this representation is to support the allocation of 'Land to the north of the Railway Line and to the south of Bekesbourne Lane, Canterbury' as part of the Council's preferred Canterbury focussed growth strategy, making use of existing and proposed infrastructure for sustainable travel and delivering connected strategic housing growth through expansion of the city, that will provide further economic growth and extra investment in local transport.
- 1.1.5 The land lies adjacent to a recognised strategic extension allocation within the current adopted Local Plan, Site 1 – South Canterbury (also within our client's control), which is designed to provide 4,000 dwellings, 70,000 sqm of employment space, local shopping facilities and other provisions including upgraded road, cycle, pedestrian and public transport infrastructure. A hybrid application was approved 3rd February 2021 following a legal challenge to the application being resolved by the Supreme Court, with a decision dated 1st July 2019 issued refusing to hear the appeal.
- 1.1.6 Following detailed assessment undertaken by the project team, it is apparent that the site has the potential to facilitate the provision of an eastern relief road to Canterbury, ultimately linking the A2 at Bridge with the A257 Littlebourne Road via the existing South Canterbury allocation.
- 1.1.7 We further note that the Council has declared a Climate Emergency, with a clear target to achieve net zero carbon emissions by 2030. This is reflected in the emerging vision which offers a forward thinking and bold approach to addressing climate change alongside an ambitious growth agenda. Achieving carbon neutrality alongside significant growth is an undoubtedly ambitious vision and one to which our client is equally committed, through the delivery of high-quality carbon-efficient schemes, that promote existing and deliver future sustainable transport options and are capable of securing economic, environmental, and social benefits.
- 1.1.8 For the reasons outlined in this document and based upon the current national and local planning policy context, including the adjacent Local Plan allocation, we

consider that there remains compelling justification for the site to be allocated for housing to help meet the growing need for new homes in the city in a location with good existing connections to the city and the A2, as well as helping to facilitate a potential eastern link road.

- 1.1.9 We also consider that the site continues to have a role to play in accommodating the wider overspill of housing need from London and elsewhere within the South East of England should this become necessary.
- 1.1.10 Accordingly, we include within this submission illustrative development proposals and the core evidence needed to demonstrate that the land is available and developable within the Plan period.

1.2 Document Structure

- 1.2.1 Within Section 2 of this Statement, we introduce the site and its surroundings and explain the characteristics that make it a suitable location for future growth before providing an overview of the type of development that could be delivered on the submission site.
- 1.2.2 Section 3 provides an overview of the Council's draft Vision and Options and the evidence currently being prepared to inform the new Local Plan.
- 1.2.3 Section 4 comments on the Council's identified growth options and considers the suitability of the site in context. It is further demonstrated the site is available and developable within the emerging Plan period.
- 1.2.4 Section 5 draws conclusions in respect of why the site is suitable for allocation and should be included within the emerging Plan.

2 The Site and Illustrative Proposals

2.1 Overview

- 2.1.1 The land within our clients' control, and which is being promoted for development, amounts to approximately 34.5 hectares situated to the south of the A257 and Bekesbourne Lane. The site is undeveloped and in agricultural use, primarily for arable purposes.



Figure 1: Illustrative Aerial Site Overview Map (courtesy of Google Earth)
Red = land previously promoted. Blue = additional land now within our client's control

- 2.1.2 There is sporadic tree planting along the southern boundary. To the west, the site borders existing development and to the south it is bound by the Canterbury East to Dover Priory railway line.
- 2.1.3 The site falls within an Area of High Landscape Value and adjacent to Little Barton Farm Conservation Area. No heritage assets are located within the site, albeit a number of Listed Building are located adjacent to the site boundaries, namely:
- To the north:*
- Orchard House (Grade II)
 - Highlands (Grade II)
 - The Manor House (Grade II)
- To the west:*
- Little Barton Farmhouse (Grade II)
- 2.1.4 In terms of topography, the site is relatively flat and according to the Environment Agency Flood Risk Map, the site does not fall within an area identified to be at risk of flooding.
- 2.1.5 With respect to connectivity, vehicular access currently exists to the northwest corner from Beckesbourne Lane. A range of Public Rights of Way (PRoW) are located within the vicinity of the site, including Public Footpath 0316/CC42/2,

which crosses the site from east to west and provides a connection with Spring Lane.

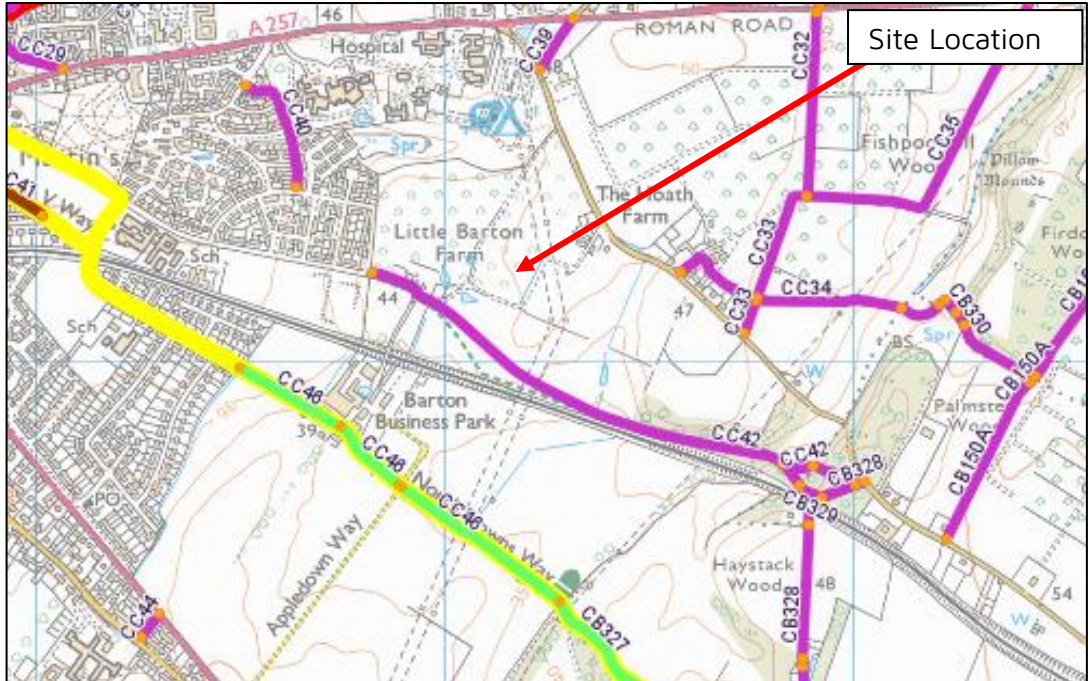


Figure 2: Public Right of Way Overview Map (courtesy of Kent County Council)

2.1.6 Regional Cycle Route 16 passes to the south and west of the site and provides a link between Canterbury and Dover. Additional local cycle routes within the surrounding area provide further connections to the city centre and are identified below. It is noted in this respect that a new cycle route between New Holmes Road and New Dover Road via Spring Lane and Pilgrims Way is proposed within the Canterbury District Transport Strategy.

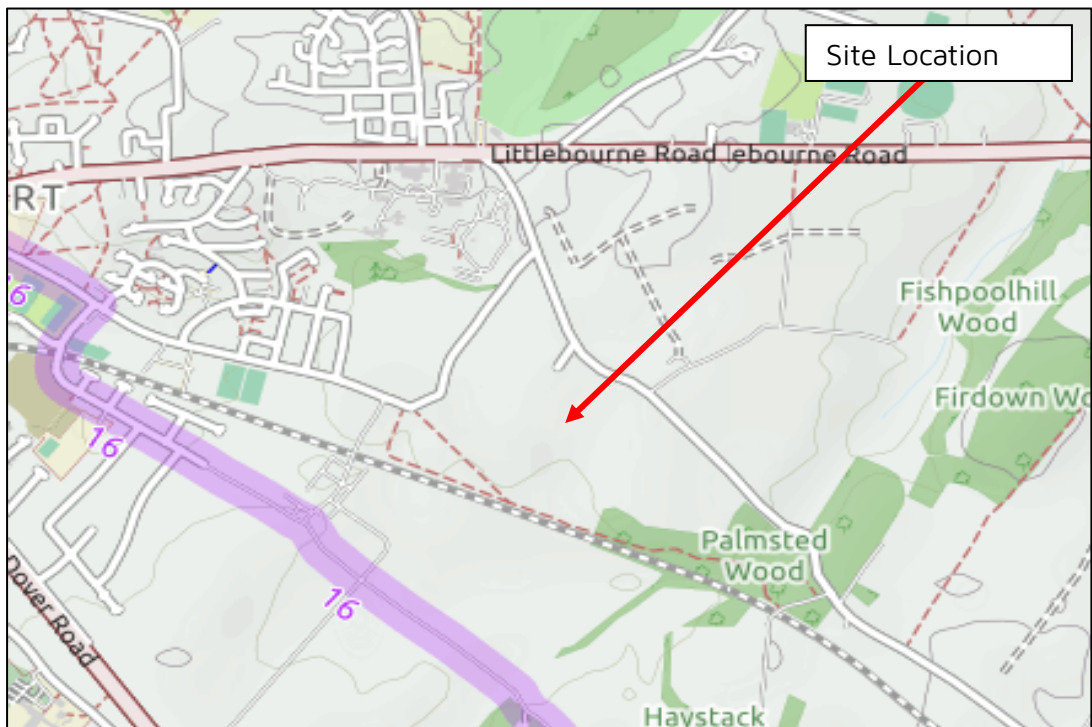


Figure 3: Local Cycle Routes (courtesy of Cycle Streets)

2.2 Site Surroundings

- 2.2.1 The site is located immediately to the east of the Canterbury urban area, in close proximity to a large range of services and facilities within the city, including employment, primary, secondary, and further education, health care, retail and leisure.
- 2.2.2 In terms of public transport, Canterbury East Railway Station is located approximately 2.5km to the west of the site, providing access to regular train services between Dover Priory and London Victoria via Faversham. Canterbury West Station is located approximately 3km to the north west of the site, providing access to higher-frequency services between Ramsgate, London Charing Cross and London St Pancras International via Ashford International.
- 2.2.3 Bus stops located on Spring Lane to the west of the site. A summary of the services that call at these stops is provided below in Table 2-1.

Service	Route	Weekday Frequency
23	City Centre – Spring Lane Estate	3 per hour
23A	City Centre – Barton Estate – Spring Lane Estate	Hourly
25A	City Centre – Hospital – Barton Estate – Spring Lane Estate	Hourly (evening)
956	Spring Lane Estate – City Centre – Sturry – Spires Academy	3 per day (Thu and Fri)

Table 2-1: Local Bus Services

2.3 Planning History

- 2.3.1 According to the online planning application records held by Canterbury City Council, there have been no previous applications relating to the site.
- 2.3.2 Nevertheless, given the inherent relationship with the aforementioned site allocation to the south in terms of ownership, use and relevant provision of transport infrastructure, details of the recently approved planning application are for completeness provided below.

CA//16/00600 – Land North And South Of New Dover Road Canterbury Extending North To Canterbury-Dover Railway Line West To Nackington Road And South To A2.

Planning application for the proposed South Canterbury urban extension, for up to 4,000 dwellings comprising:

- A) *Detailed proposals for 140 dwellings with access via New Dover Road, internal vehicular/cycle/pedestrian routes and public open space.*
- B) *Outline application for up to 3,860 additional dwellings with all matters reserved except access (excluding internal circulation) also including;*
- *Two primary schools*

- *A Community Hub comprising uses including: shops, financial and professional services, food and drink outlets business hotel residential institutions, including care accommodation dwellings non-residential institutions, including medical and health services, creches, conference centre, community centres and places of worship assembly and leisure uses, including indoor sports facilities petrol filling station*
- *An additional Local Centre accommodating any of the above uses except hotel, residential institutions, conference centre and petrol filling station*
- *Land reserved for a potential relocation of the Kent & Canterbury Hospital including associated medical and health services and an energy centre; or, if not required for the hospital and associated uses, business, hotel, conference centre and/or petrol filling station*
- *Park and Ride facility to accommodate 1,000 car parking spaces and bus interchange*
- *Public open space, including parks and gardens, green corridors, amenity green space, play areas, semi-natural / natural open space, outdoor sports pitches including pavilions, allotments/community orchards including storage buildings, and civic spaces - Vehicular access via the A2 by means of a replacement junction near Bridge and link road to New Dover Road*
- *Vehicular, cycle and pedestrian access via New Dover Road, Nackington Road and Pilgrims Way with separate bus-only access via Nackington Road*
- *Cycle and pedestrian access via the North Downs Way*
- *Internal vehicular, cycle and pedestrian routes, including a green bridge over New Dover Road*
- *Drainage and utilities infrastructure*
- *Diversion of the 132kV overhead electricity transmission lines and removal of seven pairs of pylons.*

2.3.3 The approval of the above application provides a clear direction of travel for the future growth of the area to the south and southeast of Canterbury as a broad location capable of delivering significant and sustainable growth. Both the approved site and land subject of this representation will make substantial use of existing and proposed public transport and active travel infrastructure and are capable of providing continuing infrastructure improvements to develop a highly connected growth area, that supports the economic prosperity of Canterbury city centre.

2.4 Illustrative Proposals

Overview

2.4.1 An allocation for up to 800 homes is sought.

2.4.2 Detailed proposals have not been advanced, and any future scheme would be subject to early and meaningful engagement with the local community and key stakeholders, including the Council. Nevertheless, for reference, a high level opportunities and constraints plan is provided below (**Appendix 1**) which provides an early indication of potential layout, access and pedestrian networks in context to the allocated (and approved) site to the south.

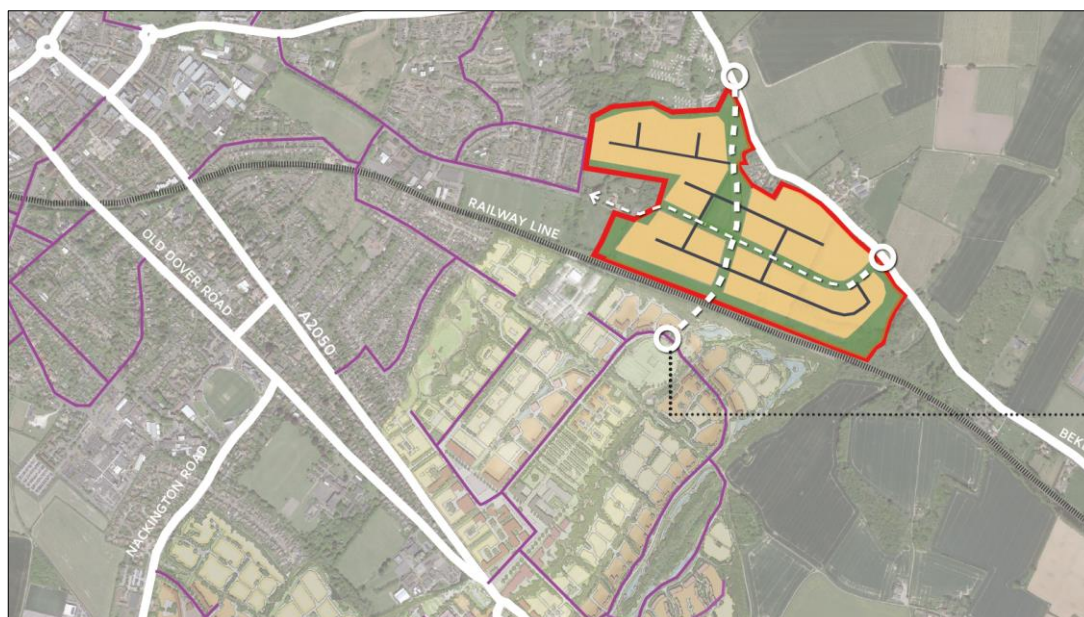


Figure 4: Extract of Illustrative Site Layout Plan (Appendix 1)

Access, Local Highway Impact and A2 Link Road

- 2.4.3 In terms of accessibility, the site is well-situated within close proximity to a range of existing local services and facilities within the Canterbury urban area where further public transportation investment is proposed. These can be accessed within a short walking distance via Public Footpath 0316/CC42/2 and Spring Lane to the west, where access to local bus services is also available.
- 2.4.4 Following an initial appraisal by DHA Transport, it is considered that there is the potential for vehicular access to the site to be achieved from Spring Lane and/or Bekesbourne Lane; the latter by way of a priority junction on the north western boundary and localised widening to the junction with the A257 Littlebourne Road. This junction is also capable of enhancement within highway land to provide a more conventional priority junction layout.
- 2.4.5 As has been noted, the site has the potential to facilitate the provision of an eastern relief road to Canterbury, ultimately linking the A2 at Bridge with the A257 Littlebourne Road via the existing South Canterbury allocation. This would assist in relieving existing and future traffic congestion and related air quality issues in the city centre and facilitate the rebalancing of this area in favour of non-car modes.

Landscape, Ecology and Land Contamination Input

- 2.4.6 The site is presently in the countryside in planning terms but borders built development on its western boundary.
- 2.4.7 The site is within the Canterbury Area of High Landscape Value, which will be considered in detail in any subsequent planning application. It is also noted that the site falls adjacent to the Little Barton Farm Conservation Area.
- 2.4.8 The site also has a low degree of tranquillity – the A257 to the north is a busy road, and although not visible from the site, traffic will be heard from within the

site, and there is a general awareness of its presence. The railway line immediately to the south is a further noise generator.

- 2.4.9 Vegetation around the site boundaries would be retained and enhanced as part of any development.
- 2.4.10 There would be some adverse visual effects for nearby residents and also for users of the PRoW which passes through the site, but such effects are likely to occur with any medium sized residential development on the edge of a settlement, and most of the views which would be affected already include other residential areas.
- 2.4.11 Any adverse landscape or visual effects arising from development of the site would be at a relatively low level, would affect a limited area only, and would decline over time as a result of the extensive areas of open space that can be provided within the site.
- 2.4.12 An Extended Phase 1 Ecological Survey will be prepared for submission as part of any application. Due to the undeveloped nature of the site, it is not anticipated that contamination will be present.
- 2.4.13 In summary, whilst there would be some low-level harm in landscape and visual impact terms from the redevelopment of the site, there would be minimal risk in terms of contamination and ecological impacts. Any such harm is a largely inevitable consequence of the development of a greenfield site, and for this particular site the harm would be well contained by the edge of the settlement.

Flood Risk and Drainage

- 2.4.14 The site is located in Flood Zone 1, which is defined as having a low risk of flooding from rivers and sea. There is also a low risk of flooding from other sources (sewer, ground water, artificial sources, and surface water).

Affordable Housing Provision

- 2.4.15 The adopted Local Plan requires affordable housing at a rate of 30%. Assuming the new Local Plan retains this threshold, an opportunity exists to deliver circa 225 affordable homes on this site.

Open Space

- 2.4.16 In line with current Policy DBE8, forthcoming development proposals will make provision for a substantial element of public open space.

Amenity Considerations

- 2.4.17 Although the detailed site layout is a matter that would be addressed at the planning application stage, it is accepted that any development would involve a loss of view over this undeveloped agricultural site. However, this is characteristic of all greenfield site options on the edge of existing settlements.

- 2.4.18 Nonetheless, through appropriate landscaping and design, it can be ensured that development does not have a significant detrimental effect on the residential amenity enjoyed by residents of the neighbouring dwellings.

Summary and Conclusion

- 2.4.19 As set out above, there are a number of planning matters that will be required to be addressed as part of the redevelopment of this site. However, none of these are matters that could not be adequately mitigated by high quality master planning.

3 Canterbury City Council Draft Vision & Options

3.1 Consultation Background

3.1.1 Canterbury City Council are currently working on a review of the adopted Local Plan which is required by the National Planning Policy Framework (NPPF), which will set out the blueprint for Canterbury until 2040 as well as identify sites for specific uses including homes, jobs and open space.

3.1.2 Following the 'Key Issues' consultation which closed 30th September 2020, the Council are currently consulting on the draft 'Vision and Growth Options' which will inform the new Local Plan for the district. The consultation invites views on the overarching vision and growth strategy for the district as well as more specific strategies focussing on the future of town centre strategy, housing and new communities, employment and the local economy, town centres and local facilities, movement and transport and historic and natural environment. A sustainability appraisal is provided to support the consultation and assesses the Local Plan options to help understand the economic, social and environmental implications of each option.

3.2 Policy Framework

3.2.1 The Early Review of the Local Plan will be examined by an Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a Development Plan document a local planning authority must have regard to several matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and is summarised below. This states that Plans must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

3.2.2 In addition, to the above, the NPPF states that:

"Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- (a) *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- (b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:*
 - I. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - 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.*

3.2.3 It is important to note that the NPPF requires strategic policies to set out an overall strategy for the pattern, scale, and quality of development, and make sufficient provision for:

- (a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- (c) community facilities (such as health, education and cultural infrastructure); and
- (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.2.4 It is clear from the above, that any Local Plan should set out a comprehensive and cohesive approach to future development.

3.2.5 This representations seek to secure what we consider a suitable and deliverable site for allocation within the new Local Plan that is consistent with the most appropriate growth strategies.

3.3 Duty to Cooperate and Implications of London Plan Growth

3.3.1 In addition to the district's own housing pressures, the Government requires constructive and active engagement with relevant bodies and neighbouring authorities to maximise effective working on strategic matters. This 'duty to cooperate' is the mechanism by which strategic planning takes place and is taken into account at the local level.

3.3.2 Part of the duty to cooperate involves considering whether or not neighbouring authorities' unmet housing need can be accommodated. In this respect, consideration of recent amendments to the London Plan have identified that the

City's housing need is increasingly difficult to deliver and therefore areas outside of London will be faced with having to absorb additional housing.

- 3.3.3 Consequently, the Council has a duty to explore whether it can accommodate this overspill of London's unmet need.

4 Assessment of Suitability

4.1 Overview

4.1.1 The preferred options consultation is informed by the previous key issues consultation which closed in September 2020. The consultation sets out the draft vision and growth options and a range of wider development strategy options that seek to respond to the identified key issues and will go on to define the nature of development in Canterbury district during the new Local Plan period to 2040.

4.1.2 This chapter considers the each of the relevant option categories in turn and against the accompanying Sustainability Appraisal (May 2021) prepared by Wood Group UK Ltd, with particular focus on the suitability of the Council's preferred option. For completeness, the full list of sections for public consideration are summarised below:

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

4.2 Draft Vision and Growth Options

Vision Summary

4.2.1 The Council sets out an ambitious draft vision supported by strategic objectives for the new Local Plan period, with growth and investment centred on Canterbury, that enhances the historic, natural and cultural environment for residents and visitors alike, with a clear focus on developing a strong and resilient economy in the district that offers high skilled jobs in science and technology sectors, harnessing the growth and development of universities and a strong medical sector and making use of the excellent connections to London and the continent.

4.2.2 The Council's vision sees investment in digital infrastructure and walking and cycling routes to improve air quality, health and wellbeing and seeks to improve connectivity to existing communities and create new healthy communities of high quality, low carbon design with good public transport links to the city and beyond with a range of new homes, public spaces and community facilities to meet the needs of the district.

Growth Options

4.2.3 The Council have at this stage set out six growth options for consultation, one of which has been highlighted as 'the preferred option'. The options are outlined immediately below before being considered in more detail in the following:

- Canterbury Focus C – Greatest Canterbury led growth and investment (preferred option)

- Canterbury Focus A – Canterbury led development
- Canterbury Focus B – High growth Canterbury led development
- Coastal Focus – development led at Herne Bay and Whitstable
- Rural Focus – development led by sustainable rural areas
- New Freestanding Settlement – development led by a new settlement

Assessment of Suitability

4.2.4 The six growth options can be broadly categorised into three Canterbury-led options differentiated by the target number of new homes and the degree of transport infrastructure and public realm improvements. Two other alternative strategies focus development towards to the two major coastal settlements or the rural villages with less emphasis on Canterbury and finally an ambitious sixth option proposed a new freestanding settlement with less growth at the existing settlements.

4.2.5 The Council have set out their preferred option as Canterbury Focus C which proposes a firm Canterbury-led strategy that takes advantage of the city’s potential with ambitions for significant improvements to public spaces and community infrastructure, significant investment in Park and Ride and bus infrastructure such as new bus lanes and upgrades of the A28 to allow traffic to bypass the city centre to the east and link public transport hubs. This will be supported by ambitious targets of 14,000-17,000 new homes by 2040.

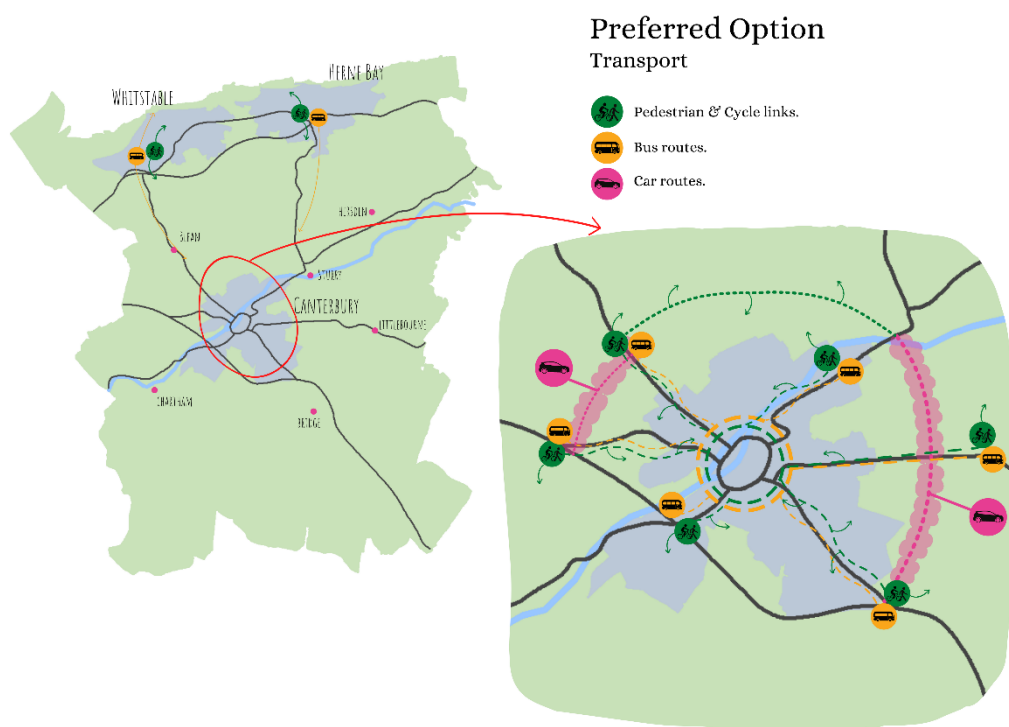


Figure 5: Indicative Preferred Option Canterbury C Transport Map

- 4.2.6 To this effect, we support the Council's preferred option that recognises the substantial sustainable credentials of the city in the context of an ambitious net zero carbon by 2030 vision and the economic and social potential afforded by the city's business, education and cultural/heritage assets. As the principal settlement in the district, Canterbury in our view is a logical location for significant growth further owing to its excellent connections to the capital and the continent as well as other major Kent towns.
- 4.2.7 The benefits of an ambitious housing target are as the Council highlight, the ability to deliver substantial and genuine improvements to the city's road network, public transport infrastructure and public realm and community facilities which, crucially were identified as the top three most pressing issues by members of the public in the Autumn 2020 'key issues' consultation.
- 4.2.8 Accordingly, an ambitious plan-led strategy, that seeks to tackle these complex and large-scale challenges is wholly supported and, in our view, can only be fully realised by an equally ambitious housing target that sets out well-connected strategic housing growth through expansion of the city.
- 4.2.9 Clearly such a quantum of growth cannot be solely realised through development within the built-confines of Canterbury and other settlements where suitable brownfield sites have largely been depleted and accordingly, a strategy for the expansion of the city, led by key public transport and road infrastructure improvements will be necessary to accommodate such growth and further, it is emphasised the capabilities of greenfield city expansion, by virtue of its less constrained nature is more capable of mitigating its own impacts and achieving greater delivery of travel infrastructure, affordable housing and community facilities with lesser restrictions due to viability.
- 4.2.10 In particular we express support on the indicative proposals for an eastern link road (figure 5) that will both ease traffic congestion and associated emissions into the city centre and provide links to proposed new and upgraded public transport hubs to the east of the city, with a view to creating public transport and active travel corridors that connect the peripheries of Canterbury quickly and efficiently to the centre. Accordingly, we would highlight the east of Canterbury has clear potential to accommodate significant growth and can form a natural continuation to the broad strategic growth of south Canterbury, which formed the basis of the current Local Plan and has recently secured consent.
- 4.2.11 Moreover, we point to the results of the Sustainability Appraisal (SA) which considers the impacts of each growth options in detail and confirms that Canterbury Focus C and Canterbury Focus B performed similarly, with significant positive effects on the economy, transport and health in recognition of the focus on Canterbury, higher growth levels and investment in transport infrastructure. However, it is recognised that Canterbury Focus B may not deliver the public realm and open space improvements and the redesign of movement within the city so full benefits may not be realised. A mix of minor positive and significant negative effects have been identified for biodiversity, landscape and land use. Importantly the SA emphasises that the high growth options present an opportunity to meet the identified needs of particular groups and address the poor levels of affordability in the district.

- 4.2.12 The SA does highlight a degree of uncertainty about delivery about the higher levels of growth in the Preferred Option (Canterbury Focus C) and Canterbury Focus B although notes that this could be mitigated by backloading delivery to later in the plan period.

Remaining Growth Options

- 4.2.13 Considering the remaining five growth options in more detail, as mentioned above Canterbury Focus B performs similarly to the preferred option in terms of the SA objectives. Nevertheless, it is less ambitious in its plans to deliver public realm and open space improvements and the redesign of movement within the city and accordingly, whilst certainly not an inappropriate growth strategy, it realises the vision objectives with respect to healthy communities and quality of life for residents and visitors to a lesser extent.
- 4.2.14 Canterbury Focus A is in essence a more conservative growth strategy to either B or C with a housing growth target of minimum 9,000 homes. As a result more modest infrastructure improvements are proposed. This is reflected in the SA which confirms that Canterbury Focus A was found not to deliver the housing growth required to support substantial investment in infrastructure, particularly transport infrastructure within Canterbury. Therefore, the benefits associated with the Preferred Option and Canterbury Focus B for transport will be lessened. Given the complex nature and significant spatial extent of the issues identified by the public during the autumn key issues consultation. In our view the most appropriate strategy is one that seeks to deliver genuine and tangible benefits in the forms of substantial infrastructure and community benefits that will make a real and lasting change to residents and visitor's experiences of Canterbury. This can only be met by the more ambitious preferred growth option C.
- 4.2.15 Turning to the alternative growth options, which seek to direct development to either the coastal towns or rural settlements. Both options perform well in terms of meeting housing need and we submit that the growth of coastal towns and rural settlements in the district should remain a priority in order to ensure areas of the district are not disadvantaged by disproportionately low levels of investment. Nevertheless, growth strategies should equally respond to the sustainability credentials of the settlement hierarchy and accordingly a focus on the inherently less sustainable coastal towns or rural settlements of Canterbury district would not lend itself well to national objectives to increase low-carbon journeys. Equally, a focus too far from Canterbury risks a decline in the economic productivity of the city which is undoubtedly the business, education and tourism core of the district and home to the greatest proportion of the district population. Accordingly, the benefits of investment elsewhere in the district away from Canterbury will be felt by a lesser number of the population.
- 4.2.16 As set out within the conclusions of the SA, the Coastal Focus could increase pressure on the coastal nature designated sites including those internationally recognised (Thanet Coast and Sandwich SPA/Ramsar and Thames, Medway & Swale SPA/Ramsar) with regards to recreational pressures. However, development could drive investment in these and other sites of biodiversity value in the coastal area. The coastal focus would also not support enhanced transport provision within Canterbury city or elsewhere and could lead to increase private car use.

- 4.2.17 With respect to the Rural Focus, it was acknowledged that this would assist in meeting the housing needs across the district including affordability in rural areas. However, it would lead to a dispersed pattern of development that may exacerbate unsustainable travel patterns and increased reliance on the private car. Dispersed development could also have the potential for indirect effects on designated sites, through the piecemeal and pervasive loss (across the district) of sites important for connectivity, biodiversity network and foraging by designated species. Overall, the Option would have some positive impacts across a range of SA Objectives but there would be fewer positive effects than the other Options assessed. We would further point to the difficulty in delivering infrastructure improvements to a dispersed settlement patterns where benefits would be less far reaching and again, highlight the risks of a significant reduction investment in the principal settlement of the district.
- 4.2.18 Finally, the new freestanding settlement focus is in our view an inappropriate strategy at this particular time. While the SA confirms that this strategy would meet the housing need identified we would question the feasibility and deliverability of such a proposal within the plan period given no location has yet been identified and the inherent difficulties in delivering the scale of development and associated infrastructure when starting from scratch in the relatively short time scale of a single plan period. This would represent an even greater risk as the focus of new development and would represent a significant gamble on delivery late on in the plan period with a likely substantial undersupply in the early and middle periods. The SA goes on to conclude that the strategy would see substantial encroachment into the countryside with associate negative effects on biodiversity, land use and landscape albeit there would be potential for planned mitigation. Nevertheless, while there would be capability of sustainable transport measures within the settlement itself, it is likely that travel between settlements would be less well-connected and result in an overall increase in private car use.

Summary

- 4.2.19 Given the above, it is clear that the preferred option Canterbury Focus C represents the most logical growth strategy that best addresses the identified key issues and performs the joint highest in the SA. The option avoids the need for a wholesale change in growth direction and instead seeks to further harness the potential of the most sustainable and economically productive settlement in the district, to deliver significant infrastructure led development that brings about genuine and tangible benefits to the greatest number of district residents and visitors and will make the greatest contribution housing need. The strategy is also compatible with the current adopted Local Plan strategy and builds on the benefits delivered by existing allocations.

Accordance with Proposed Allocation

- 4.2.20 The proposed allocation site is considered to wholly accord with the preferred option Canterbury Focus C which represent the most appropriate growth strategy for the district going forward to 2040.
- 4.2.21 The proposed allocation site is located on the periphery of Canterbury to the edge of the indicative area of search (figure 5) albeit the site would strongly relate as a natural extension to the South Canterbury allocation (since approved). Given the current greenfield nature of the site, the proposed allocation would be capable

of making a significant contribution to the ambitious housing targets proposed by Canterbury C and would assist in the much-needed delivery of affordable housing in the district. Further, the allocation of larger scale sites is key in both the delivery of substantial infrastructure improvement, carbon efficiency and the ability to mitigate own impacts not always possible in small/medium scale sites, particularly in more constrained urban areas where issues of viability are commonplace. Equally we acknowledge the recent difficulties faced by very large sites (e.g South Canterbury) in the current Local Plan and emphasis the need for the pragmatic allocation of more traditional large sites that are capable of delivering the greater numbers of new homes needed to meet the ambitious targets, particularly in the medium term of the plan period, more so than small sites or indeed very large settlement extensions.

- 4.2.22 In line with an infrastructure led strategy, highlighted as a key area of concern by the public and identified as having particular relevance to the east of Canterbury, the site has the potential to facilitate the provision of an eastern relief road to Canterbury, ultimately linking the A2 at Bridge with the A257 Littlebourne Road via the existing South Canterbury allocation. This would assist in relieving existing and future traffic congestion and related air quality issues in the city centre and facilitate the rebalancing of this area in favour of non-car modes.
- 4.2.23 Accordingly, given the above context, the proposed allocation site is not only compatible with the proposed growth strategy, but integral in its successful delivery and should be allocated accordingly as part of an infrastructure led development strategy to the east of Canterbury.

4.3 Wider Preferred Options

Town Centre Strategies

- 4.3.1 The draft vision for Canterbury city centre is to build on the existing assets of the city as a key visitor and shopping destination in Kent and diversify and improve its offer, encouraging investment in the city to stimulate activity and contribute to the vibrancy and vitality of the centre.
- 4.3.2 Canterbury will experience significantly reduced traffic congestion through a decisive switch towards active travel which will improve health, quality of life and the environment with a high-quality public realm and reinforcement of heritage and ecological assets.
- 4.3.3 In this respect we support the clear strategy for Canterbury and consider the role of residential development extensions, sustainably located on the outskirts of Canterbury and well-connected by high-quality public transport and active travel corridors to be key to driving the footfall in the city centre and facilitating the economic and cultural growth of Canterbury. Large scale allocations are capable of significant mitigation and assist in developing green spaces, community facilities and ecological corridors within the urban area and crucially are capable of delivering the scale of transport infrastructure improvements needed to alleviate the wide-scale issues of congestion, parking and air quality, not only in Canterbury but also in other settlements within the district, by providing better access to regional transport hubs.

Housing and New Communities

- 4.3.4 The current Local Plan focuses on large strategic sites, often in excess of 800 homes. The preferred option (HNC2C) sets out a desire for the maximisation of opportunities for the delivery of small and medium sites to deliver new homes with additional policy support for windfall and organic growth within urban areas. Whilst we are supportive of a range of sites coming forward, particularly to ensure delivery across the plan period (in our experience, small sites tend to get built out relatively quickly) we would urge caution and stress the crucial role that large scale sites play in delivery significant growth, not just in terms of pure housing numbers but in delivering the associated infrastructure, community facilities and ecological enhancements needed to sustain growth. Large scale sites are often much better placed to mitigate their own impacts and are capable of delivery wider plan-led infrastructure improvements simply not possible by smaller sites.
- 4.3.5 Accordingly, we are supportive of a balance being struck in the scale of sites, albeit we stress the need for the allocation of larger sites, particular around Canterbury if both the ambitious growth objectives in terms of the number of new homes and associated road network and public transport improvements are to be delivered. This is of even greater relevance given the Council's preferred option (HNC16C) to promote an 'infrastructure first' or infrastructure-led approach to the delivery of critical infrastructure.
- 4.3.6 Equally, the delivery of homes to meet specialist housing needs is best achieved by large scale site allocations where issues of viability generally are less constrained. In particular it is highlighted the need for around 464 affordable units per year in the new Local Plan period by the Housing Need Assessment (2021). Such a quantum of units will most likely be delivered in the majority by larger scale allocations that are more capable of substantial affordable housing contributions and other forms of specialist housing.
- 4.3.7 Finally, with reference to brownfield and regeneration development we are similarly generally supportive of the Council's preferred option (HNC3B) to maximise opportunities for delivery of suitable brownfield and regeneration developments. Nevertheless, whilst such sites are helpful in the delivery of often sustainably located urban centre development, we would urge the Council to strike an appropriate balance in the allocation of brownfield and large scale greenfield sites given that brownfield and regeneration sites are often limited in size, surrounding infrastructure and their ability to mitigate their own impacts. Further such sites are not always able to provide significant affordable housing numbers or assist in the delivery of significant infrastructure and transport improvements owing to physical and/or financial viability constraints and can often be delayed due the degree of remediation works or other unknowns that are an inherent constraint to previously developed sites.

Employment and the Local Economy

- 4.3.8 Option EMP4C (preferred option) seeks to maximise the connectivity and accessibility of employment developments by ensuring that all strategic development sites incorporate some business and commercial space and enhance the sustainability of new communities and to reduce the need to travel. Whilst we are supportive of the preferred option, we emphasise the need to substantiate an objective for well-connected employment opportunities and new communities, by investing in public transport infrastructure improvements and supporting the larger scale allocations that can contribute to their delivery.

Movement and Travel

- 4.3.9 The Council vision, in accordance with net zero carbon goals, seeks to rebalance the transport network towards more walking, cycling and public transport and supporting low-emission vehicles. Addressing congestion and improving air quality were clear messages from the consultation last year, and people suggested that improving street environments to make walking and cycling safer and more attractive, and providing more better-quality public transport services were all important elements to achieve this.
- 4.3.10 Accordingly we are supportive of preferred options MT1B (maximising opportunities for walking and cycling) and MT2B/MTD (maximising access to the bus / train network). In this respect, while we are generally of the view that smaller sites should be directed towards and make use of existing infrastructure, such is the ambitious level of growth required by the preferred growth strategy (in the region of 14,000 -17,000 new homes), inevitably not all new development will be conventionally located to existing infrastructure.
- 4.3.11 Accordingly, large scale allocations, part of key strategic development areas will be crucial in delivering the necessary public transport and active travel infrastructure improvements necessary to accommodate the level of desired growth and bring about the changes needs to achieve net zero carbon. In particular we highlight the Council's desire to improve connectivity to the east of Canterbury through new and improved public transport hubs, active travel routes and an eastern link road to bypass the city centre. Such significant improvements will realistically only be deliverable through large scale strategic allocations that build on that already allocated in the current Local Plan and must be plan-led as part of a clear and defined integrated wider strategy, if the Council are keen to pursue infrastructure-led development without delaying the delivery of new homes.

4.4 Deliverability / Availability

- 4.4.1 The NPPF states that 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.
- 4.4.2 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."*

- 4.4.3 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.
- 4.4.4 Having regard to the above context, we can confirm that, subject to reasonable Section 106 contributions being sought, there are no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the Plan period.
- 4.4.5 The site has the potential to facilitate the provision of an eastern relief road to Canterbury, ultimately linking the A2 at Bridge with the A257 Littlebourne Road via the existing South Canterbury allocation (also within our client’s control). This would assist in relieving existing and future traffic congestion and related air quality issues in the city centre and facilitate the rebalancing of this area in favour of non-car modes.
- 4.4.6 For reasons set out elsewhere in this representation, the site is considered suitable for development. Likewise, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution, or contamination.
- 4.4.7 Finally, the site is entirely within our clients’ control and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the Plan period. The location of the site adjacent to the recently permitted major South Canterbury allocation, further demonstrates our client’s firm commitment to the area as a location for strategic plan-led growth both in the current and upcoming plan period.

5 Conclusion

5.1 Summary

- 5.1.1 This representation has been prepared on behalf of FC Stark (Billings Group) in response to the Canterbury City Council Draft Vision and Options consultation, which runs until 9th August 2021.
- 5.1.2 FC Stark (Billings Group) controls 'Land to the north of the Railway Line and to the south of Bekesbourne Lane, Canterbury' and is promoting the site for residential allocation as a part of the Canterbury Local Plan Review process.
- 5.1.3 The land is seen as a logical extension to the existing Site 1 allocation in the existing Local Plan and is both consistent with and will assist in the realisation of the Council preferred growth strategy for significant Canterbury focussed growth in the context of an ambitious net zero carbon vision by 2030. Further, it is apparent that the site has the potential to facilitate the provision of an eastern relief road to Canterbury, ultimately linking the A2 at Bridge with the A257 Littlebourne Road via the existing South Canterbury allocation.
- 5.1.4 For the reasons outlined in this document and based upon the current national and local planning policy context, including the adjacent Local Plan allocation, we consider that there remains compelling justification for the site to be allocated for housing to help meet the growing need for new homes in the city as well as helping to facilitate a potential link road.

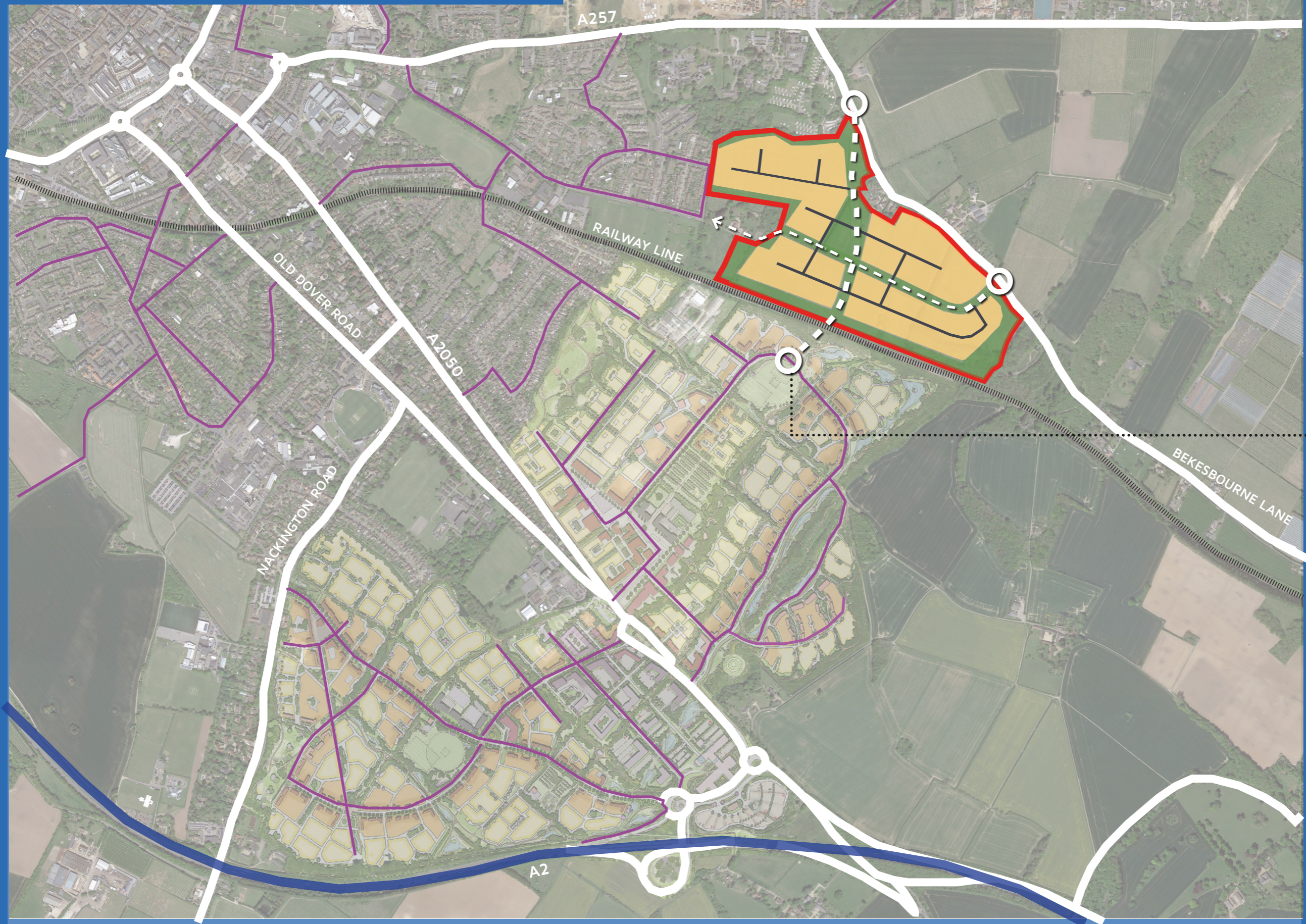
APPENDIX

1



Land to the north of the Railway Line and to the south of Bekesbourne Lane, Canterbury

CCC Local Plan Consultation July 2021



KEY

- Red line area
40.5 ha
- Residential development
- Green Space
- Future link road
- New internal road network
- Existing primary road network
- Existing secondary road network
- Railway line
- A2

Potential connection to A2 Interchange

