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Canterbury City Council Local Plan

Draft Vision and Options Consultation and Call for Sites Addendum

Land at Maypole Aerodrome, Maypole Road, Maypole Hoath.

On behalf of Mr K Whaid - August 2021 - DHA/15728.



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1 Introduction

1.1 Overview of this Representation

- 1.1.1 This representation has been prepared on behalf of Mr K Whaid in response to the Canterbury City Council Draft Vision and Options consultation, which runs until 9th August 2021.
- 1.1.2 Mr Whaid owns Land at Maypole Aerodrome, Maypole Hoath, and is promoting the site for a residential allocation as a part of the Canterbury Local Plan Review process.
- 1.1.3 The site has previously been submitted within the first Call for Sites (summer 2020) and more recently as part of the most recent Call for Sites. We attach the documentation that has been submitted for completeness in **Appendix 1**.
- 1.1.4 As Canterbury City Council will be aware the site was until quite recently in use and the permission remains in place. An area of the site also comprises a stable and sand school such that there are a range of buildings and an area of land that can be considered “previously developed”.
- 1.1.5 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 Council’s area, while making use of PDL in a way that can help sustain local services and enhance the setting of heritage assets.

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 some residential redevelopment in the short term, as redevelopment of a previously developed site that will benefit the nearby residential properties in terms of residential amenity and the character appearance and setting of the adjoining Conservation Areas. In addition, we consider that the site has longer term potential for future growth on the basis that there is an opportunity to expand the adjacent settlements to an extent that they can become more sustainable.
- 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 The Site

- 2.1.1 The land at Maypole Airfield covers approximately 18.65 hectares and has until very recently continued in use as an aerodrome. The site is bound by Maypole Road to the east, Hicks Forstal Road and residential properties to the south, and open fields to the west and north.
- 2.1.2 The site comprises a number of buildings, a large area of hardstanding and a 1no. runway, as well as a large complex of stables and riding area. The site is not situated within the Urban Area Boundary so is considered countryside in planning terms.
- 2.1.3 The attached site Plan shows the extent of the site in **Appendix 2**.
- 2.1.4 In terms of environmental and heritage designations, the site is situated in the Blean Woods Area of High Landscape Value which is considered a 'moderate' designation according to the Call for Sites 2021 Guidance document, published by Canterbury City Council.
- 2.1.5 The site is located in Flood Zone 1 (least likely to flood) and does not contain any Listed Buildings, although there are some Grade II Listed Buildings somewhat close to the site, including The Homestead to the south and Maypole House, Orchard House, Green Oak Farm, My Home and Pear Tree Cottage to the north.
- 2.1.6 In addition, the site is designated in a Strategic Access Management and Monitoring (SAMM) area and will therefore require a contribution to the Thanet Coast and Sandwich Bay Special Protection Area (SPA), which will be discussed in further detail within Section 4 of this report.
- 2.1.7 The site does not lie within the Green Belt nor within an Area of Outstanding Natural Beauty.



Figure 1: Approximate Site Location (Courtesy of Google Earth).

- 2.1.8 To the north of the site lies the Ford, Maypole and Oldtree (Hoath) Conservation Area, to the east of the site lies the Clay and Silt (Unlithified Deposits Coding Scheme), to the south of the site lies the Hoath, Rushbourne and Tile Lodge Conservation Area, and to the west of the site lies an unclassified Ancient Woodland, Blean Complex Special Area of Conservation, Blean Woods National Nature Reserve and East Blean Woods Site of Special Scientific Interest (SSSI).
- 2.1.9 We are advised that the area to the south of the site, adjacent to East Blean Woods (marked by a '1'), has been granted permission for residential development. Unfortunately, the specific details of this permission cannot be found on the Canterbury City Planning Portal and therefore, the proposed scale of development cannot be assessed against this proposal. However, it should be noted that the site is located close to the aforementioned environmental designations and therefore, represents a similar form of development.

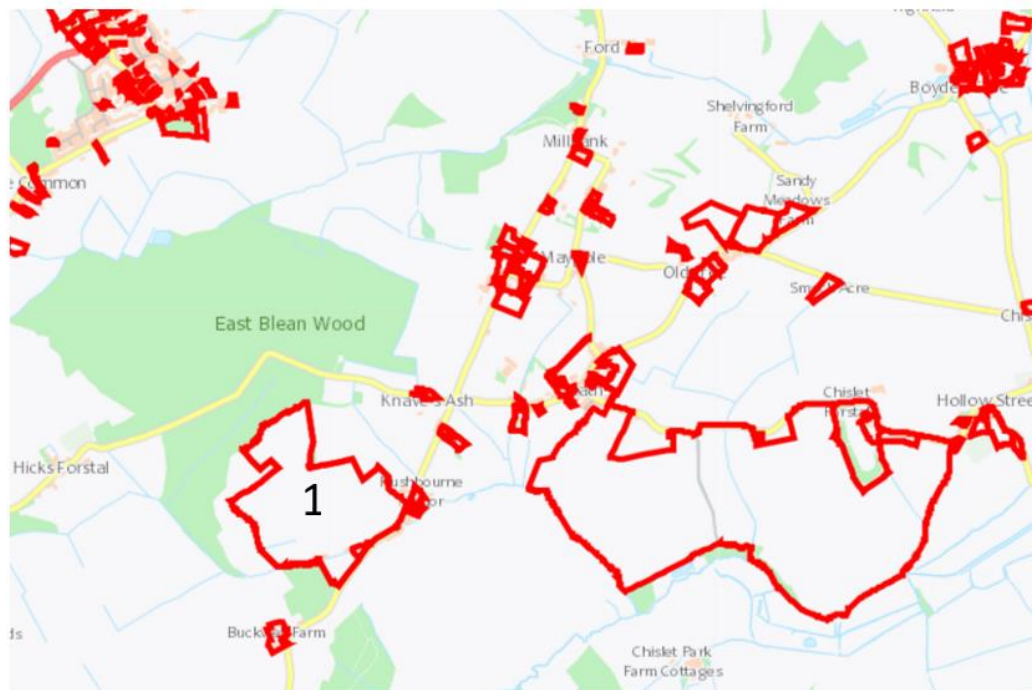


Figure 2: Planning Applications within the immediate locality (Courtesy of Canterbury City Council).

- 2.1.10 Hoath is designated as a 'Village' within the Rural Settlement Hierarchy, which is contained within the Canterbury District Local Plan (2017).
- 2.1.11 Whilst considered countryside and located within the Blean Woods Area of High Landscape Value, the site itself accommodates no ecological constraints and is located in Flood Zone 1. In addition, the site itself is not located within a Conservation Area and contains no Listed Buildings, albeit we acknowledge that there are Conservation Areas and heritage assets adjacent.
- 2.1.12 The site benefits from being in close proximity to a number of local services, including but not limited to:

Services:	Distance:
The Prince of Wales at Hoath	95 metres
Garage Coffee, Roastery	225 metres
Mount Pleasant Stables	400 metres
Holy Cross Church	520 metres
Hoath Primary School	550 metres
Hadlow G R & Sons	2 kilometres
Canterbury Garden Centre at Herne Common	2.5 kilometres

- 2.1.13 In terms of accessibility, the site benefits from being located 120 metres from the nearest bus stop, with an additional 5no. stops located within a 540 metres radius. These stops offer daily services to Canterbury and Herne Bay. In addition, the site is approximately 4 kilometres from Herne Bay Train Station and 4.25 kilometres from Sturry Train Station, which provide regular services to London Victoria, Ramsgate, London St Pancras (International), Ashford International and Maidstone East.
- 2.1.14 With regard to road networks, the site is located adjacent to Maypole Road which provides a northerly route to Ford Hill and the A299, which links east Kent with west Kent and the M2 more broadly, as well as a southerly route to Babs Oak Hill and the A28, which provides a direct route to Canterbury.
- 2.1.15 As aforementioned, the site is also located close to the Blean Woods National Nature Reserve which provides access to open space which is essential for potential future residents.
- 2.1.16 Given the above, the site is considered a sustainable location close to amenities, services and open recreational spaces.

2.2 Planning History

- 2.2.1 The online planning application records held by Canterbury City Council show the site has been subject to a number of applications which are of importance to these representations. These applications are outlined below:

Reference	Subject of Application	Description	Outcome
CA//03/01710	Maypole Farm, Maypole Road, Hoath.	Variation of condition to allow up to 18 take-offs daily.	Refused (06-Apr-2005)/ Appeal Withdrawn.
CA//02/00219	Maypole Farm, Maypole Road, Hoath.	Removal of condition (i) and variation of condition (ii) of planning permission CA/84/0266/HOA to allow additional aircraft movements on three specific dates in 2002 (or up to 21 days from those dates).	Granted (01-May-2002).
CA//01/00513	Maypole Farm, Maypole Road, Hoath.	Removal of condition (i) and variation of condition (ii) of planning permission CA/84/226/HBA to allow additional aircraft movements on two specific dates in 2001.	Granted (27 Jun 2001).
CA//97/00178	Maypole Farm, Maypole Road, Hoath.	Variation of condition (ii) of planning permission CA/84/226/HOA to allow 10 extra aircraft take-offs per week.	Refused (25-Jun-1997).

CA//95/00536	Land At Maypole Farm, Maypole Road, Hoath.	Change of use of building 1 from agricultural use to a mixed use for the storage, maintenance and restoration of aircraft and agriculture together with the retention of building 3 for use for the same purposes and provision of septic tank drainage system and closet.	Granted (06-Dec-1995).
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2.2.2 We calculate that at present the site accommodates some 2030 sq. m. of floorspace, with a number of large buildings and substantial areas of hard-surfacing. In simple terms the floor-space equates to perhaps 20+ family dwellings, a scale of development highly suited to a Small or Medium sized Enterprise (SME).

2.3 Initial proposals

2.3.1 Detailed proposals have not been advanced, and any future scheme would be subject to early and meaningful engagement with the Council and Local Community. However, we consider that an initial phase of housing of perhaps 20-25 units would act to help sustain the existing facilities as identified.

2.3.2 This would need to be sympathetic to the form of the existing settlements and the nearby and surrounding designations. We therefore advocate this initial smaller scale proposal of 20-25 dwellings with a view to then reaching a critical mass that can sustain the school, church and pub. We would hope that a sympathetic expansion of the settlement would eventually support other facilities such as a small scale shop, albeit the advent of home delivery means this is perhaps no longer essential for sustainable settlements.

2.3.3 Looking toward delivery in the latter stages of the Local Plan, it would seem likely that the Council's preferred Option will have resulted in some South Westwards expansion of Herne Bay toward Maypole Hoath. At that latter stage we consider the somewhat improved connections to further services may well justify a larger scale of development and potentially the expansion of the Maypole settlement up to the size necessary for the location to be considered highly sustainable.

Landscape, Ecology and Land Contamination Input

2.3.4 The site is presently in the countryside in planning terms but is in part brownfield. We do not expect significant contamination but a redevelopment will allow for remediation as necessary.

2.3.5 Vegetation around the site boundaries would be retained and enhanced as part of any development.

2.3.6 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 and very significant opportunities to improve on landscaping, woodland and ecological enhancement.

- 2.3.7 An Extended Phase 1 Ecological Survey will be prepared for submission as part of any application.
- 2.3.8 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.

Flood Risk and Drainage

- 2.3.9 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

- 2.3.10 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 local needs affordable housing and potentially self build provision, subject to a carefully crafted design code.

Open Space

- 2.3.11 In line with current Policy DBE8, forthcoming development proposals will make provision for a substantial element of public open space.
- 2.3.12 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

- 2.3.13 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) *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. *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. *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 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

4.3 Assessment of Suitability

4.3.1 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 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.

4.3.2 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.

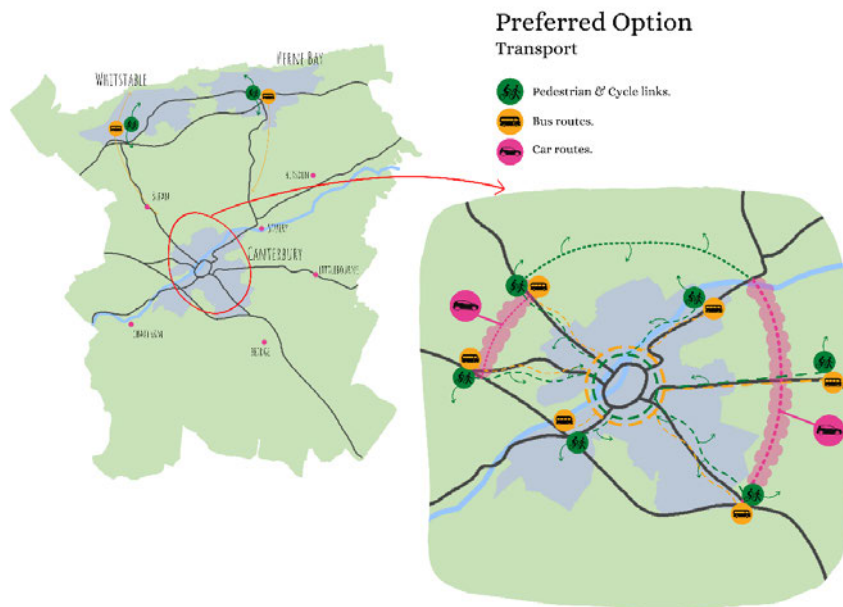


Figure 3: Indicative Preferred Option Canterbury C Transport Map

- 4.3.3 To this effect, we generally support the Council in its strategy to expand Canterbury as much as sensible. In this respect we recognise the substantial sustainability credentials of the city and the economic and social potential afforded by the city's business, education and cultural/heritage assets. However, for the Council's plan to be effective we consider it likely that some of the larger scale proposals will have a longer time-line for delivery and require other options to deliver the housing numbers and growth over the first 5 years or so.
- 4.3.4 In this respect the Council will be aware of the Government support for SME's in the delivery of smaller scale sites. We consider the Options should allow for delivery of 10% small scale sites in accordance to ensure delivery in the early years of the plan.
- 4.3.5 As the principal settlement in the district, we do fully acknowledge that Canterbury is a logical location for significant further growth owing to its excellent connections to the capital and the continent as well as other major Kent towns.
- 4.3.6 However, in pursuing this strategy, we consider it essential to recognise the likely time-lag in delivery of major strategic sites such that Council must in parallel pursue in part elements of the other growth options, and in particular we encourage the promotion of sites suitable for SME's.
- 4.3.7 In this respect CCC must not to lose sight of the fact that the Council's area contains a number of areas of potential growth where there are opportunities to make use of existing services and infrastructure and to help sustain those areas and services by a proportionate level of growth.
- 4.3.8 New development can also help maintain the sustainability and indeed increase the sustainability of existing settlements that do have the benefit of some services.
- 4.3.9 Accordingly, while supporting the aim to make the most of Canterbury as a growth zone, we do submit that the Council should also provide for growth at other settlements, especially where there is capacity in infrastructure, and where there is a need to help maintain existing facilities and services. This parallel strategy will help deliver units in the early years of the plan and help to ensure the Council's housing trajectory remains on track.

Consideration of other Growth Options

- 4.3.10 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. It is less ambitious in its plans to deliver public realm and open space improvements and the redesign of movement within the city. 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 Canterbury to a lesser extent. Importantly however it does promote sustainable growth of other settlements.
- 4.3.11 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.

- 4.3.12 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 possibly only be met by the more ambitious preferred growth option C. However, due to the inevitable time lag of delivery of major sites it will be essential that the Council makes the most of other opportunities as referenced above.
- 4.3.13 We therefore advocate a somewhat "hybrid" approach.
- 4.3.14 This will ensure existing infrastructure capacity is utilised to enable early delivery of a good level of housing for the first 5 years or so of the plan period. This will be required due to the inevitable longer timescales involved in the delivery of a combination with making the most of brownfield sites in areas where development will help to sustain and enhance the sustainability credentials of settlements to which they relate.
- 4.3.15 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 part of a hybrid approach in order to ensure areas of the district are not disadvantaged by disproportionately low levels of investment, or settlements allowed to become less sustainable by the loss of facilities due to population decline or stagnation.
- 4.3.16 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.
- 4.3.17 In this respect we consider expansion of Whitstable and Herne Bay should be achieved in a south westerly direction to make the most of the better road connections.
- 4.3.18 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.
- 4.3.19 As stated previously, we very much support delivery of sensibly scaled development in settlements that either have capacity and potentially excess capacity in existing infrastructure, or in settlements where some growth would help to sustain existing services. We reiterate that we consider Maypole Hoath such a settlement and the existence of a large area of PDL provides an opportunity to ensure a critical mass exists for the existing services to be maintained.

Summary

- 4.3.20 Given the above, we consider a hybrid strategy, which makes the most of opportunities at existing large scale settlements should be coupled with proportionate growth across other settlements.
- 4.3.21 Development that makes good use of Previously Developed Land while also improving the sustainability credentials of existing settlements, as can very much be the case with Maypole Hoath should in our submission be supported.

Housing and New Communities

- 4.3.22 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.
- 4.3.23 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) and can help with delivery in the early years of the plan period.
- 4.3.24 Accordingly, we are supportive of a balance being struck in the scale of sites.
- 4.3.25 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, albeit we reiterate that proportionate growth of settlements with schools and other facilities in villages should also be supported.

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 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 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.
- 4.4.6 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 fact there are opportunities to enhance the local environment and potentially expand local access, including to ecology are matters that warrant support.

5 Conclusion

5.1 Summary

- 5.1.1 This representation has been prepared on behalf of Mr Karl Whaid in respect of an area of brownfield land that lies adjacent to a village with school and other local facilities.
- 5.1.2 The land could make an initial contribution of perhaps 20-25 units based on existing floorspace and in due course, could provide for a greater level of development.
- 5.1.3 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 Council's area as part of a "Hybrid" options approach that focuses on ensuring settlements remain sustainable. It also presents a particular opportunity for a high quality scheme suitable for an SME or for self build units that would also provide an opportunity for occupiers to enjoy a rural lifestyle, while also providing for local needs housing.

APPENDIX

1



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Canterbury City Council- Call for Sites 2021.

Land at Maypole Airfield.

On behalf of Mitcham Building Supplies Ltd.

July 2021 – DHA/15728.



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1 Introduction

1.1 Purpose of this Report

- 1.1.1 These representations have been prepared on behalf of Mitcham Building Supplies Ltd in respect of the Canterbury City Council 'Call for Sites 2021' which runs until Friday 09th July 2021.
- 1.1.2 Mitcham Building Supplies Ltd controls 'Land at Maypole Airfield' (or 'the site').
- 1.1.3 These representations seek the inclusion of this strategic expansion of Hoath which is recognised as sustainable, viable and deliverable.
- 1.1.4 The proposal would deliver a minimum of 20-25no. dwellings on land that lies to the north of Hoath village centre in Maypole. Overall, an indicative housing capacity of 50no. dwellings is considered achievable at the site in the longer term.
- 1.1.5 Any future scheme would be subject to early and meaningful engagement with the local community and key stakeholders, including the City Council.
- 1.1.6 Importantly, the proposal has been informed by a suitable evidence base and is subject to consideration of a number of specialist technical matters by reference to online resources across a range of specialisms. In addition, the proposal has followed the 'Call for Sites 2021 Guidance' document published by Canterbury City Council.
- 1.1.7 In terms of structure, these representations firstly set out the background to the Local Plan and our proposal and finally, summarise why the inclusion of Maypole Airfield would represent part of the most appropriate, sustainable strategy for the City Council.

1.2 Background

- 1.2.1 Canterbury City Council are currently working on a review of the adopted Local Plan which is required by Paragraph 33 of the National Planning Policy Framework (NPPF).
- 1.2.2 This review will inform the new Local Plan for the district, which will set out the blueprint for Canterbury until 2040 as well as earmark sites for specific uses including homes, jobs and open space.
- 1.2.3 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.

1.2.4 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) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- (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 areas, unless:
 - (i) the application of policies in this Framework that protect areas of 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.”

1.2.5 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.

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

1.2.7 To conclude, these representations seek to earmark what we consider a suitable and deliverable site for allocation within the new Local Plan.

2 Site and Surroundings

2.1 Site Location

- 2.1.1 The land at Maypole Airfield covers approximately 18.65 hectares and has until very recently continued in use as an aerodrome. The site is bound by Maypole Road to the east, Hicks Forstal Road and residential properties to the south, and open fields to the west and north.
- 2.1.2 The site comprises a number of buildings, a large area of hardstanding and a 1no. runway, as well as a large complex of stables and riding area. The site is not situated within the Urban Area Boundary so is considered countryside in planning terms.
- 2.1.3 In terms of environmental and heritage designations, the site is situated in the Blean Woods Area of High Landscape Value which is considered a 'moderate' designation according to the Call for Sites 2021 Guidance document, published by Canterbury City Council. The site is also located in Flood Zone 1 (least likely to flood) and does not contain any Listed Buildings, although the site is surrounded by a number of Grade II Listed Buildings including The Homestead to the south and Maypole House, Orchard House, Green Oak Farm, My Home and Pear Tree Cottage to the north.
- 2.1.4 In addition, the site is designated in a Strategic Access Management and Monitoring (SAMM) area and will therefore require a contribution to the Thanet Coast and Sandwich Bay Special Protection Area (SPA), which will be discussed in further detail within Section 4 of this report.
- 2.1.5 The site does not lie within the Green Belt nor within an Area of Outstanding Natural Beauty.



Figure 1: Approximate Site Location (Courtesy of Google Earth).

- 2.1.6 To the north of the site lies the Ford, Maypole and Oldtree (Hoath) Conservation Area, to the east of the site lies the Clay and Silt (Unlithified Deposits Coding Scheme), to the south of the site lies the Hoath, Rushbourne and Tile Lodge Conservation Area, and to the west of the site lies an unclassified Ancient

Woodland, Blean Complex Special Area of Conservation, Blean Woods National Nature Reserve and East Blean Woods Site of Special Scientific Interest (SSSI).

- 2.1.7 We are advised that the area to the south of the site, adjacent to East Blean Woods (marked by a '1'), has been granted permission for residential development. Unfortunately, the specific details of this permission cannot be found on the Canterbury City Planning Portal and therefore, the proposed scale of development cannot be assessed against this proposal. However, it should be noted that the site is located close to the aforementioned environmental designations and therefore, represents a similar form of development.

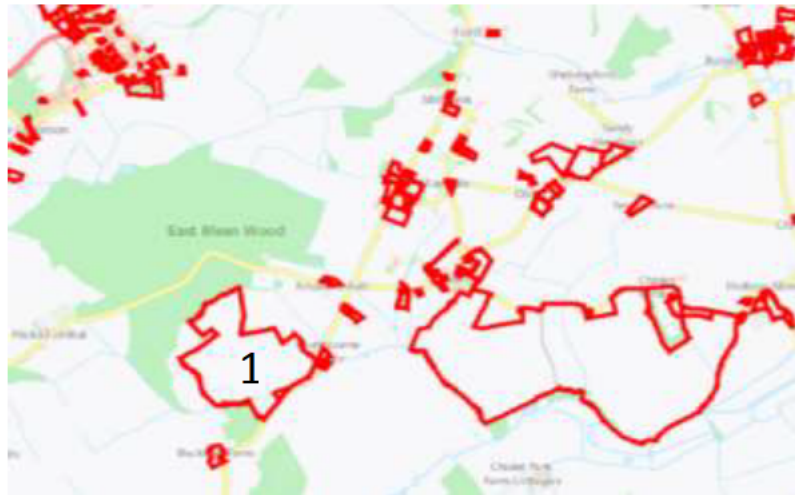


Figure 2: Planning Applications within the Locality (Courtesy of Canterbury City Council).

2.2 Site Surroundings

- 2.2.1 Hoath is designated as a 'Village' within the Rural Settlement Hierarchy, which is contained within the Canterbury District Local Plan (2017).
- 2.2.2 Whilst considered countryside and located within the Blean Woods Area of High Landscape Value, the site itself accommodates no ecological constraints and is located in Flood Zone 1. In addition, the site itself is not located within a Conservation Area and contains no Listed Buildings, albeit we acknowledge that there are Conservation Areas and heritage assets adjacent.
- 2.2.3 The site benefits from being in close proximity to a number of local services, including but not limited to:

Services:	Distance:
The Prince of Wales at Hoath	95 metres
Garage Coffee, Roastery	225 metres
Mount Pleasant Stables	400 metres
Holy Cross Church	520 metres
Hoath Primary School	550 metres
Hadlow G R & Sons	2 kilometres
Canterbury Garden Centre at Herne Common	2.5 kilometres

- 2.2.4 In terms of accessibility, the site benefits from being located 120 metres from the nearest bus stop, with an additional 5 no. stops located within a 540 metres radius.

These stops offer daily services to Canterbury and Herne Bay. In addition, the site is approximately 4 kilometres from Herne Bay Train Station and 4.25 kilometres from Sturry Train Station, which provide regular services to London Victoria, Ramsgate, London St Pancras (International), Ashford International and Maidstone East.

- 2.2.5 With regard to road networks, the site is located adjacent to Maypole Road which provides a northerly route to Ford Hill and the A299, which links east Kent with west Kent and the M2 more broadly, as well as a southerly route to Babs Oak Hill and the A28, which provides a direct route to Canterbury.
- 2.2.6 As aforementioned, the site is also located close to the Blean Woods National Nature Reserve which provides access to open space which is essential for potential future residents.
- 2.2.7 Given the above, the site is considered a sustainable location close to amenities, services and open recreational spaces.

2.3 Planning History

- 2.3.1 The online planning application records held by Canterbury City Council show the site has been subject to a number of applications which are of importance to these representations. These applications are outlined below:

Reference	Subject of Application	Description	Outcome
CA//03/01710	Maypole Farm, Maypole Road, Hoath.	Variation of condition to allow up to 18 take-offs daily.	Refused (06-Apr-2005)/ Appeal Withdrawn.
CA//02/00219	Maypole Farm, Maypole Road, Hoath.	Removal of condition (i) and variation of condition (ii) of planning permission CA/84/0266/HOA to allow additional aircraft movements on three specific dates in 2002 (or up to 21 days from those dates).	Granted (01-May-2002).
CA//01/00513	Maypole Farm, Maypole Road, Hoath.	Removal of condition (i) and variation of condition (ii) of planning permission CA/84/226/HBA to allow additional aircraft movements on two specific dates in 2001.	Granted (27 Jun 2001).
CA//97/00178	Maypole Farm, Maypole Road, Hoath.	Variation of condition (ii) of planning permission CA/84/226/HOA to allow 10 extra aircraft take-offs per week.	Refused (25-Jun-1997).
CA//95/00536	Land At Maypole Farm, Maypole Road, Hoath.	Change of use of building 1 from agricultural use to a mixed use for the storage, maintenance and restoration of aircraft and agriculture together with the retention of building 3 for use for the same purposes and provision of septic tank drainage system and closet.	Granted (06-Dec-1995).

3 Overview of Development Sought

3.1 Introduction

- 3.1.1 The purpose of the Call for Sites is to gain information about potential sites for allocation in the new Local Plan.
- 3.1.2 According to the Canterbury Call for Sites 2021 Guidance document, future sites for housing should comprise an area greater than 0.15 hectares and over 5no. dwellings.

3.2 Proposal

- 3.2.1 Explicitly, the site at Maypole Airfield covers approximately 18.65 hectares and will be submitted for housing, which could comprise general housing (including affordable), self-build and custom build housing, or specialist housing for less ambulant persons.
- 3.2.2 According to the 'Net Developable Area Tool' outlined in the Canterbury Call for Sites 2021 Guidance document, the site comprises an estimated 55-75% development capacity. When considering this in context of the 'Housing Density Multiplier Tool' which suggests 30-35no. dwellings per hectare in rural areas, the site could provide an indicative housing capacity of between 308-489no. dwellings.
- 3.2.3 However, when deploying a proactive approach to identifying possible barriers to the successful development of the site, it is important to note the adjacent 'high level' environmental designations. These include an unclassified Ancient Woodland, Blean Complex Special Area of Conservation, Blean Woods National Nature Reserve, and East Blean Woods (SSSI), as well as Conservation Areas and Listed Buildings.
- 3.2.4 The Canterbury Call for Sites 2021 Guidance document states that if the site itself was designated within any of these high-level designations, development would be fundamentally unacceptable or only justified by exceptional circumstances.
- 3.2.5 Therefore, to mitigate the potential impact of development upon these adjacent designations, it is important to consider a lower development capacity at the site as well as a phased approach to future development. We set out below alternative scenarios which we ask the Council to consider.

3.3 Larger Scale Option

- 3.3.1 The built area at the site comprises approximately 15% of the total site area. It is therefore considered that this represents a more appropriate, localised, and short-term development capacity, which pays specific regard to the adjacent environmental designations. Accordingly, a more appropriate indicative housing capacity on the site, in the short-term, equates to perhaps up to 50no. dwellings- if built form is allowed to extend across existing buildings as well as the sand school, stables and aviation areas.

3.3.2 With regard to the potential long-term prospect at the site, in order to uphold the adjacent environmental designations, the site would need to maintain a visual and physical buffer comprising significant landscaping to encourage biodiversity and mitigate any impacts arising. This will also ensure future occupiers have access to open space, which is essential to their well-being and the biodiversity of the area. Therefore, an additional development capacity of 30% is advised. Accordingly, an appropriate indicative housing capacity on the site in the long-term equates to approximately 50no. dwellings, albeit we acknowledge this may require highway capacity improvements.

3.4 Smaller Scale Option

3.4.1 Should the Council not consider the above acceptable, an alternative small-scale redevelopment of the existing buildings at the site is proposed. Based on utilising just the area of existing buildings, we consider the 'built' envelope as exists could accommodate up to around 20-25no. dwellings.

3.5 Additional Information

3.5.1 As future development will comprise 11 or more dwellings, the following standards outlined in the current Local Plan and National Planning Policy Framework (NPPF) will be adhered to:

- 30% Affordable Housing comprising 70% rented (affordable or social) and 30% Intermediate Housing ;
- A minimum of 10% of the homes to be available for affordable home ownership (shared ownership or other intermediate housing product);
- Approximately 25% of new general needs housing and 10% to 15% of Affordable Housing will be provided to accessible and adaptable standards; and
- 20% of homes will meet M4(2) of the Building Regulations.

3.5.2 Whilst detailed proposals have not yet been advanced, any future scheme would be subject to early and meaningful engagement with the local community and key stakeholders, including the City Council.

4 Justification of Proposed Allocation

4.1 Introduction.

4.1.1 To accompany the plans and documentation, we consider it prudent to explain the rationale for promoting the site and why we consider it appropriate for allocation.

4.1.2 The site currently comprises a number of buildings, a large area of hardstanding, stables and sand school as well as 1no. runway. Importantly, the buildings at the site are considered structurally sound and are no longer being used by virtue of the closure of the airfield in May 2021; these include a range of hangar buildings and other structures of typical commercial or farm appearance. The site area currently built on equates to approximately 2 acres such that, 20-25 units seems readily achievable.

4.1.3 Initial analysis of existing built form and vegetation demonstrates that the site can accommodate new residential development without substantial harm arising to the area. The buildings represent a brownfield site, and the built area could be effectively redeveloped.

4.2 Design

4.2.1 The Conceptual Site Layout Plan, cited below for ease of reference, demonstrates how residential development could be provided at the site and how the adjacent environmental designations would be protected.

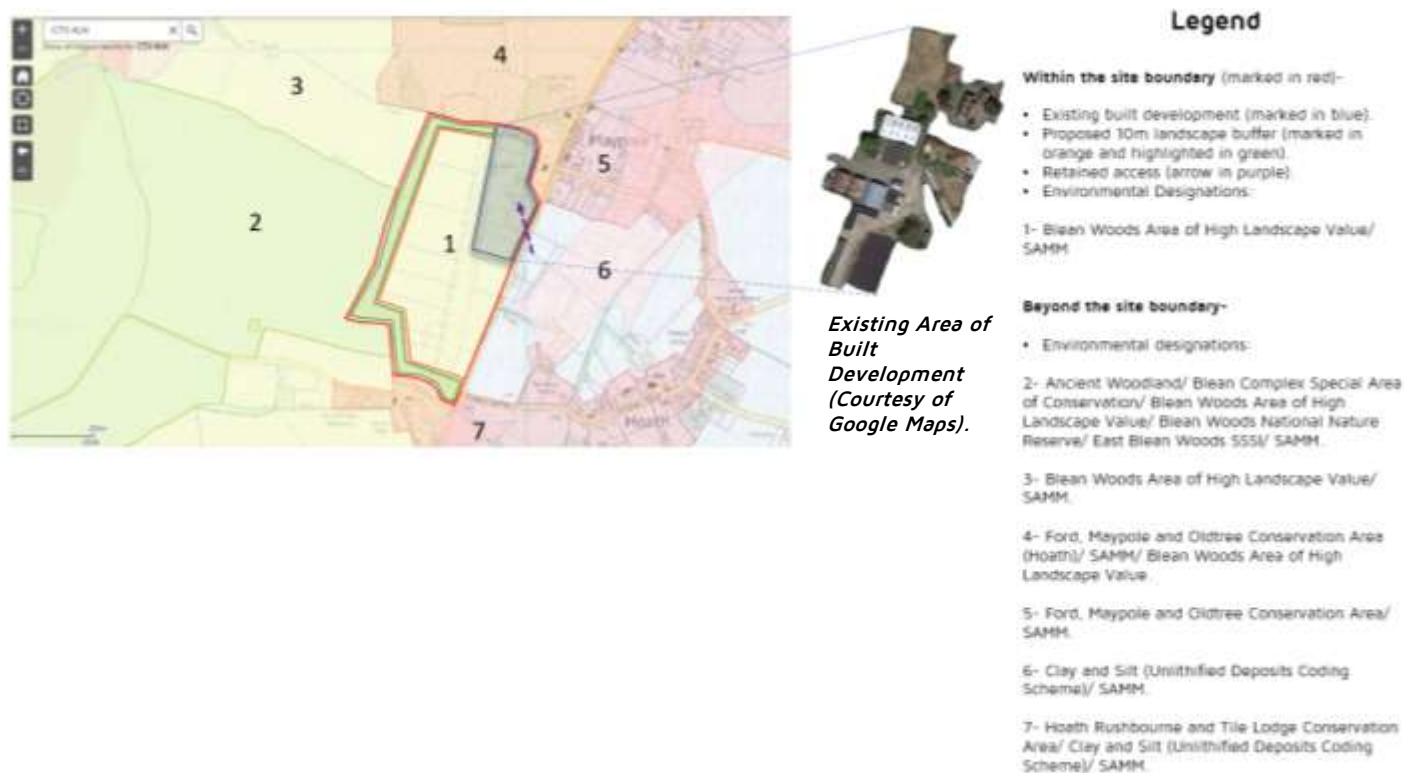


Figure 3: Conceptual Site Layout Plan (Courtesy of DHA Planning).

- 4.2.2 We consider that any submitted design could take a similar approach to existing adjacent built form to seamlessly fit into the surrounding area, and would provide additional natural surveillance for the area. The Conceptual Site Layout Plan also shows access and a significant landscape buffer to proactively account for the adjacent environmental designations. Moreover, the existing access from Maypole Road will be retained to ensure a safe and suitable access to the development.
- 4.2.3 It is therefore submitted that the proposal would create a high-quality environment and we strongly advocate the allocation of the site, either for a small scale development of 20-25no. units or if considered appropriate, a larger scale proposal of up to 50 units.

4.3 Sustainability

- 4.3.1 On the issue of sustainability, provision of housing would perform an economic role by contributing to local construction employment, would generate an increase in gross value for the site, would provide investment in the new build fabric and would provide the opportunity for the use of local materials. Furthermore, household expenditure generated by future residents will support local economic activity and the development would enable the Council and local community to benefit from revenue linked to Section 106 contributions.
- 4.3.2 From a social perspective, residential development would help support existing services and has the potential to provide a range of dwelling types that would meet the Council's needs. This could involve self-build units or specialist housing suitable for less ambulant persons.
- 4.3.3 Finally, from an environmental perspective, consideration has been given to the environmental value of the site in terms of landscape quality, agricultural potential, ecology, historical assets and archaeology, residential amenity, land contamination, air quality, noise impact and locational sustainability.
- 4.3.4 The site is considered of relatively good visual quality and the current buildings are structurally sound. Therefore, the development would help encourage the re-use of land which has previously been developed. This is a favoured concept outlined by the NPPF.

4.4 Deliverability

- 4.4.1 In respect of deliverability, there are not considered to be any impediments to the site being phased for potential development commencing within the 0-5 year period, nor do we envisage any unexpected 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. We consider there is an opportunity to deliver a high-quality residential development scheme in an efficient and timely manner.

4.5 SAMM Contribution

- 4.5.1 As detailed proposals have yet to be advanced, it is unclear how much will need to be contributed to the Thanet Coast and Sandwich Bay SPA. However, we do acknowledge that any future development will be liable to this payment and look

forward to working with the Council to mitigate the impact of the proposed development.

5 Conclusion

5.1 Summary

- 5.1.1 The proposal would deliver a minimum of 20-25no. dwellings on land that lies to the north of Hoath village centre in Maypole. Overall, an indicative housing capacity of 50no. dwellings is considered achievable at the site in the longer term.
- 5.1.2 In terms of environmental designations, throughout these representations it has been demonstrated how development at the site could be managed to ensure the adjacent high level environmental designations are upheld. Specifically, by building or re-developing the existing built development as well as utilising landscape buffers to provide visual and physical screening of the development. The existing access will also be retained to ensure a safe and suitable access to the development which importantly, can be used in the short term.
- 5.1.3 It should also be noted that the site has a long history of operating as an airfield, which could be considered to negatively impact the adjacent environmental designations more than the proposal outlined by these representations.
- 5.1.4 On the issue of sustainability, provision of housing would perform an economic role by contributing to local construction employment, would generate an increase in gross value for the site, would provide investment in the new build fabric and would provide the opportunity for the use of local materials.
- 5.1.5 From a social perspective, residential development would help support existing services and has the potential to provide a range of dwelling types that would meet the Council's needs. This could involve self-build units or specialist housing suitable for less ambulant persons.
- 5.1.6 Finally, from an environmental perspective, consideration has been given to the environmental value of the site in terms of landscape quality, agricultural potential, ecology, historical assets and archaeology, residential amenity, land contamination, air quality, noise impact and locational sustainability.
- 5.1.7 Importantly, the site is considered of relatively good visual quality and the current buildings are structurally sound. Therefore, the development would help encourage the re-use of land which has previously been developed. This is a favoured concept outlined by the NPPF.
- 5.1.8 In respect of deliverability, there are not considered to be any impediments to the site being phased for potential development commencing within the 0-5 year period, nor do we envisage any unexpected 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. We consider there is an opportunity to deliver a high-quality residential development scheme in an efficient and timely manner.

5.2 Conclusion

- 5.2.1 Taking all the above into account, we respectfully request that the site is considered for allocation within the new Local Plan.

5.2.2 In addition, if there are any updates regarding the Strategic Land Availability Assessment or any queries regarding the submission, please do contact [REDACTED] or [REDACTED]

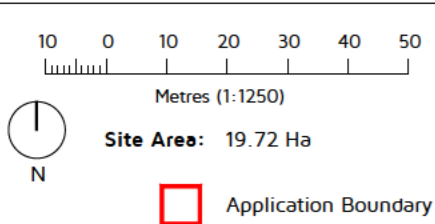
APPENDIX

2





Title
SCALE @ A1



Rev Reason Date

Client:
MITCHAM BUILDING SUPPLIES

Project:
MAYPOLE AIRFIELD, MAYPOLE ROAD
CANTERBURY CT3 4LN

Title:
SITE LOCATION PLAN

Drawing No: Rev: Scale: Date:
DHA/15728/01 1:1250 JULY 2021



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