

6 August 2021

Delivered by email

Canterbury City Council
Military Road
Canterbury
Kent
CT1 1YW

Ref: BELR3006

Dear Sir / Madam

CANTERBURY DISTRICT LOCAL PLAN 2040 - REPRESENTATIONS ON BEHALF OF BELLWAY (JULY 2021)

We write on behalf of our client, Bellway, who are promoting land south of Staines Hill, Sturry for residential development to submit representations on the emerging Canterbury District Local Plan 2040.

These representations are structured to reflect the Council's online consultation.

We note that at this stage the Council has not presented policies, or provided detail as to the way in which the options and various approaches would be delivered. As such Bellway reserve the opportunity to comment in detail as evidence is published, and the wording of draft policies is clarified.

1. Draft vision and growth options

We note that the consultation sets out various options for the quantum and distribution of development. Whilst we do not offer a particular conclusion as to what the preferred solution should be, the Council should seek opportunities to locate development in sustainable places, and should seek to boost significantly the supply of housing.

We note that the Council's preferred option seeks to deliver an extra 14,000 – 17,000 homes on the premise that a more homes will provide further economic growth and extra investment in local transport. Bellway support that approach. We note that the standard method itself is intended to provide a minimum level of homes required and we support the Council's preference to support further growth.

In order to achieve this option and support growth, the Local Plan will need to support a range of site sizes and types in a range of locations and be based on evidence that the sites to be allocated will deliver as expected. A reliance on a handful of very large sites for example may indicate that the Plan does not include the necessary flexibility and certainty to ensure that its objectives are achieved.

The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830 turley.co.uk

As a consequence, the Council should not rely on allocations in one particular location, or at one settlement tier. A reliance on one location (for example Canterbury itself) may indicate that the delivery of the housing supply is overly reliant upon one small part of the Housing Market Area and does not deliver choice and flexibility.

7. Historic and natural environment

This part of the consultation relates to the issue of 'Making sure our approach to green gaps is still effective'.

The land promoted by Bellway at Sturry is located within the Sturry-Westbere Gap as defined in the current Local Plan.

It is of course worth noting that the current Local Plan Policy OS6 explains that development will be permitted within Gaps where it does not:

- Significantly affect the open character of the Green Gap, or lead to coalescence between existing settlements;
- Result in new isolated and obtrusive development within the Green Gap.

Bellway maintains that the land south of Staines Hill, Sturry can accommodate development without resulting in the two issues set out above.

We have seen the 'Green Gaps and Local Green Space Review' (April 2021) published alongside this consultation. This document purports to undertake a review of the Gap, and in the case of the Sturry-Westbere Gap, the conclusion is o "Retain existing green gap, but amend boundary to exclude the building to the east".

There is no analysis in the Review to demonstrate whether the Gaps are necessary, or that they should be retained in their current form, or whether they could accommodate development without conflicting with the aims set out in Policy OS6 of the Local Plan.

Summary

Bellway support the Council's approach of acknowledging that housing growth has the potential to support economic growth and wider improvements. However the Council must ensure that its strategy for delivering that approach is underpinned by a deliverable housing supply in a range of sustainable locations.

Bellway would be willing to engage with the Council in further detail to consider the contribution which the land south of Staines Hill, Sturry could make to achieving the expectations in the emerging Local Plan to 2040.

Yours sincerely



David Murray-Cox
Director

