

# Canterbury Local Plan 2040 Representations

July 2021

- 1.1 These representations have been prepared by Nexus Planning, on behalf of Hallam Land Management (“HLM”), in respect of the Canterbury Local Plan (“CLP”) 2040 consultation. HLM control approximately 62 hectares of land at Brooklands Farm, Whitstable (“the Site”) that is available for a residential-led mixed use development. HLM has actively engagement in the local plan process to date, including responding to the previous Regulation 18 consultation on the emerging local plan and we would welcome the opportunity to directly engage with the Council regarding the opportunity presented by the Site.
- 1.2 A Vision Document has been prepared in support of these representations to outline our emerging concept for the Site. This includes the following key elements:
- delivery of approximately 1,300 market and affordable dwellings;
  - providing a full mix of housing sizes and types to respond to the Council’s latest needs (in particular 3 bedroom housing), including scope for self-build / custom build housing;
  - a two form entry primary school;
  - two local centres for flexible use, including scope to provide new community facilities and/or flexible workspaces;
  - Approximately 50% of the site dedicated as green infrastructure and targeting a 20% biodiversity net gain;
  - Exploring the potential to downgrade the western section of South Street and diverting the main route through the Site, enhancing the Crab and Winkle Way cycling network and amenity of existing residents in this location; and
  - Exploring the potential to upgrade the eastern section of South Street to improve traffic flows.
- 1.3 Overall, the proposals will deliver a highly sustainable development on the edge of the one of the most sustainable settlements in the District, as follows:

### Economic Objective

- A substantial capital investment of many millions of pounds during the build period including the creation of direct and indirect construction jobs
- Very significant additional population expenditure on local services and facilities
- The creation of new permanent on-site jobs through the delivery of the primary school and local centres
- A substantial CIL contribution

### Social Objective

- Delivering approximately 1,300 new homes, including policy compliant level of affordable housing
- Delivery of a two form entry primary school
- Delivery of new local centres including community facilities
- Provision of substantial new areas of open space and green infrastructure to the benefit of new and existing residents and promoting healthy communities
- Enhancing and connecting into the Crab and Winkle Way cycle network

### Environmental Objective

- Targeting a 20% biodiversity net gain
- Targeting a low/zero carbon development
- Retention and protection of existing key habitats
- All development located within Flood Zone 1
- No material impacts on archaeology or heritage assets

1.4 As mentioned earlier, we would welcome the opportunity to discuss our proposals with the Council following the conclusion of this current consultation.

1.5 The representations outlined below respond to the sections identified within the local plan consultation document.

## **1. Draft vision and growth options**

1.6 The CLP sets out a range of growth options, including a 'Preferred Option'. The Preferred Option and Canterbury Focus B do not have any obvious differences within the CLP document both in terms of the text and graphics. However, the Council's Sustainability Appraisal (SA) 2021 labels the Preferred Option as 'Canterbury C' despite this not being specifically referenced in the CLP, which includes more radical enhancements to movements within the City. The CLP is therefore presented in a somewhat unclear manner whereby the terminology in the evidence base doesn't fully align with the CLP itself. As such, these representations are based upon the assumption that the Preferred Option in the CLP is 'Canterbury C' in the SA and therefore different to 'Canterbury B'.

### Local Housing Need

- 1.7 We have reviewed the Canterbury Housing Needs Assessment (“the HNA”) and this confirms that the Standard Method minimum housing requirement for the District is 1,120 dwellings per annum, which we are satisfied is correct at the present point in time. This will however need to be kept under review as the emerging local plan progresses to ensure it is based upon the latest available data.
- 1.8 In this regard, as the existing local plan is less than five years old, the Council’s HNA caps housing need to 40% above the adopted housing requirement. However, by the time the emerging local plan is submitted for examination, the adopted local plan is likely to be more than five years old and therefore the cap should be the higher of the projected household growth for the area over the 10 year period or the adopted annual housing requirement figure. At present, that would mean the cap is applied against projected household growth, thus increasing local housing need to 1,128 per annum. As such, the Standard Method may be greater than is currently identified.
- 1.9 Notwithstanding the above, we are satisfied that 1,120 dwelling per annum is the correct figure to use for now and over the period covered by the Local Plan (2020 to 2040) this equates to a minimum housing figure of 22,400 dwellings.

### Summary of Growth Options

- 1.10 In light of the above, our understanding of the level of housing that each growth option will deliver is as follows:

Canterbury Local Plan Growth Option	Total minimum homes to be provided over 2020-2040	Annual minimum housing figure	Assumed net additional homes to be allocated in new Local Plan <sup>1</sup>
Canterbury Focus A	22,400 (meeting standard method in full)	1,120	9,000
Canterbury Focus B	27,400 – 30,400 (5,000 – 8,000 above standard method)	1,370 – 1,520	14,000 - 17,000
Canterbury Focus C – Preferred Option	27,400 – 30,400 (5,000 – 8,000 above standard method)	1,370 – 1,520	14,000 - 17,000
Coastal Focus	22,400 (meeting standard method in full)	1,120	9,000
Rural Focus	22,400 (meeting standard method in full)	1,120	9,000
New freestanding settlement	22,400 (meeting standard method in full)	1,120	9,000

<sup>1</sup> No information provided to confirm sources of supply and therefore assumed (but not agreed at this stage) that existing commitments/allocations are 13,400 dwellings noting that some spatial strategy options state that 9,000 additional dwellings are required to meet the Standard Method minimum requirement (22,400 – 9,000 = 13,400) 3

- 1.11 As set out in the table above, we understand (and base our representations upon this understanding), that all growth options seek to meet local housing need in full using the Government's standard method and that the Preferred Option (Canterbury C in the SA) and Canterbury B propose 14,000-17,000 additional homes (above existing commitments/allocations), which equates to between 5,000 and 8,000 additional dwellings above the standard method in order to support economic growth and extra investment in local transport infrastructure.
- 1.12 Paragraph 35a the NPPF details that plans should provide a strategy which, as a minimum, seeks to meet objectively assessed needs using the Government's standard method and the PPG identifies that it might be appropriate to plan for a higher housing need figure and that the Government supports ambitious authorities who want to plan for growth (ID: 2a-010-20201216). As such, we wholly support the principle of materially exceeding local housing need in the CLP.
- 1.13 As a general comment, the growth options section is heavily focused upon housing but the creation of jobs is also a critical aspect of any growth strategy and detail in this regard is somewhat lacking for each option. It is noted that the Economic Development and Tourism Study (EDTS) 2020 shows that 136,700sqm or 29.7ha of new business space is needed over the period of the CLP to 2040 but the report identifies major issues with existing supply and doesn't clarify what scale or type of new employment allocations might be required. Furthermore, there is no indication whether growth options Canterbury B and the Preferred Option that propose 14,000-17,000 extra homes include provision for comparatively higher levels of job creation to ensure a balanced growth strategy and sustainable patterns of growth that takes account of work travel patterns. This makes it challenging to comment in detail upon the appropriateness of the growth options.
- 1.14 Turning to the locational aspects of the growth options, very little detail is provided on the scale of growth envisaged at the key settlements both from a housing or employment perspective. This also makes it somewhat challenging to comment in detail against the growth options. Notwithstanding all of this, we comment as follows:

#### Preferred Option (Canterbury C in the SA)

##### Housing Growth

- 1.15 As set out earlier in these representations, we understand that the Preferred Option will deliver at least 27,400 – 30,400 homes over the plan period, of which 14,000 - 17,000 will be net additional homes over and above existing commitments / allocations.
- 1.16 We fully support the Council's preferred approach in the context of significant exceeding the Government's Standard Method minimum in order to support economic growth and extra investment in local transport infrastructure.
- 1.17 However, it is noted that the evidence within the HNA, or much of the emerging Local Plan evidence base generally, provides little or no detail associated with the spatial strategy for actually delivering between 27,400 and 30,400 dwellings and how this enables the maximum economic, environmental and social benefits from future growth to be secured. In view of this we would welcome greater clarity of Council's justification that the District's full economic potential and transport infrastructure can only be unlocked if growth is predominantly focused on Canterbury

City. For example, the use of CIL from development across the District could help to deliver transport infrastructure, such as the A28 upgrade. As such, we support the principle of this option significantly exceeding local housing need, although we do not support the scale of focus given to growth at Canterbury and consequential 'more limited' development at coastal towns.

### **Canterbury City Focus**

- 1.18 The adopted Canterbury District Local Plan ("CDLP") sets out at Policy SP4 that Canterbury, Herne Bay and Whitstable will be the "principal focus for development". However, we note that the preferred spatial strategy option proposes a material shift away from this strategy to focus the overwhelming majority of growth at Canterbury, with limited development at coastal towns (Whitstable and Herne Bay) and villages.
- 1.19 The Council's justification for this approach is suggested to be economically orientated although there is no reference to increasing job provision. Instead, it appears that this growth option is being driven by the design to deliver strategic infrastructure improvement, namely a substantial upgrade to the A28. Not only would this option require a step changing in housing delivery (not something we object to), but it would do so in a manner that is focussed around only one settlement in the District, which already has strategic allocations it must deliver through the CLP (including some that have not come forward as anticipated), at the cost of sustainable growth at the coastal settlements to ensure their long-term vitality.
- 1.20 This focussed and infrastructure heavy approach to growth raises deliverability challenges and uncertainty, as it is assumed that the deliverability and success of the strategy is somewhat reliant upon the provision of a new bypass around the City which is significant in scale. Such strategic infrastructure inevitability adds uncertainty and risks of delay or non-delivery. Due to the lack of information available, it is unclear at this stage whether the strategic infrastructure is deliverable in the plan period and we would recommend that very cautious assumptions are made in this regard. The recent examination into the North Essex Authorities Local Plan's proposals for three garden communities and subsequent recommendation by the Inspector that two are deleted, most notably due to infrastructure challenges, shows the substantial challenges that exists in this regard.
- 1.21 For this reason alone, it is suggested that a more balanced growth strategy is advanced to provide certainty on delivery and to ensure that the needs of all are met. However, there are further compelling reasons for such an approach.

### **Recognising the Importance of Coastal Towns**

- 1.22 The Canterbury Economic Development and Tourism Study, 2020 (EDTS) highlights the Thames Estuary Production Corridor (TEPC) is a 'significant new vision to unite East London, North Kent and South Essex to create a world class centre for production, leading global innovation, developing talent and cultivating world changing ideas'. Of particular note, the EDTS outlines that Whitstable as well as Canterbury has significant potential to unlock and stimulate culture-led economic growth and strengthen existing economic ties with other parts of the TEPC. In view of this, it is clear that more than 'limited' growth is required and justified at Whitstable in order to take advantage of the District's economic potential over the plan period.
- 1.23 In addition to this, it is also noted that the EDTS concludes that the lack of employment land space within Whitstable is likely to constrain economic and business activity at the settlement over much of the Plan period unless additional capacity can be identified. This again demonstrates the need

for more than 'limited' growth at Whitstable that is currently inferred within the information provided within the Preferred Option.

- 1.24 The Preferred Option refers to growth at Herne Bay to help support regeneration. We fully endorse the principle of development led regeneration. However, the Indices of Multiple Deprivation (IoMD) (2019) also confirm there are pockets deprivation within Whitstable and other coastal and rural areas that are amongst the 20% most deprived neighbourhoods in England. In view of this, growth to support regeneration should not only be focused at Herne Bay but other locations, such as Whitstable.
- 1.25 Specifically regarding Whitstable, the overall measurement of deprivation and the nine sub-domains of deprivation shows a worsening trend from the 2015 Indices, particularly against the 'Crime Domain' and the 'Barriers to Housing and Services' Domain. A spatial strategy that only delivers 'limited' growth at Whitstable over the plan period is therefore likely to result in the settlements continued decline against the IoMD domain indicators.
- 1.26 Overall, we support the Council's approach to deliver a higher level of housing growth (between 27,400 and 30,400 dwellings) than the Standard Method minimum (22,400 dwellings), to support economic growth and deliver local transport infrastructure. This general approach fully aligns with national policy and guidance. However, the District's economic growth potential is not only focused at Canterbury City, but also within the District other key settlements of Whitstable and Herne Bay. We therefore consider the growth strategy could continue to focus on Canterbury City, but with meaningful and proportionate growth at Whitstable and Herne Bay. The District's transport infrastructure priorities can then be delivered by all housing development across the District via CIL, delivering a strategic objective of the plan. Not only would this support transport infrastructure at Canterbury City, but also strategic enhancements at Whitstable, such as the identified Park and Ride facility.

#### Sub-Area Housing Needs

- 1.27 Canterbury District is characterised by three key settlements: Canterbury City, Whitstable and Hearn Bay. Whitstable and Hearn Bay collectively comprise the Whitstable and Herne Bay Coastal sub-area. The remainder of the District is referred to as 'Rural North' and 'Rural South' ("the Rural Areas"). The sub-geography profile analysis within the HNA does not apportion either the Preferred Options total housing requirement (27,400 to 30,400 dwellings) or the Standard Method minimum (22,400 dwellings) to settlements or sub-areas.
- 1.28 Analysis of the Office for National Statistics (ONS) mid-year estimates between 2011 and 2019 indicate that Whitstable's population growth has been meaningfully lower than the District's other sub-areas – a level less than half of the other sub-areas over the same time period. A key reason why Whitstable's population growth has been lower than the District more generally is likely to be associated to the low level of planned growth at the settlement within previous Local Plans – a negative trend the emerging local plan would simply serve to re-enforce.

Sub-Area	Population 2011	Population 2019	Actual Change (2011 to 2019)	% Change	CAGR
Herne Bay	38,502	41,235	2,733	7%	0.9%
Whitstable	32,811	34,134	1,323	4%	0.5%
Canterbury City	48,923	56,945	8,022	16%	1.9%

Canterbury Local Plan Representations continued

Rural Areas	30,364	33,080	2,716	9%	1.1%
Canterbury District	150,600	165,394	14,794	10%	1.2%
<i>Source: Census 2011 and LSOA Mid Year Estimates 2012 to 2019</i>					

1.29 In 2019 65% of the District’s population was aged 16 to 64 (working-age), however, only 57% of Whitstable’s population was aged 16-64. Between 2011 to 2019, the District’s working age population has remained broadly constant (65% of the total population), whereas the proportion of working age population at Whitstable has declined from 59% in 2011 to 57% in 2019. Conversely, it noted that the proportion of Whitstable’s population aged 65+ has started to steadily increase over the same period (24% in 2011 to 28% in 2019). At the District level the proportion of population aged 65+ has increased from 19% in 2011 to 21% in 2019. The demographic structure of Whitstable is therefore becoming increasing older.

1.30 In view of this, additional growth will need to be focused at Whitstable over the Local Plan period to maintain the settlement’s status within the hierarchy and to prevent negative socio-demographic issues including an aging population structure and declining working age / family households. Without additional housing growth at Whitstable over the plan period the demographic trends observed over much of the past decade are expected to continue. This has the potential to result in the settlement having a gradual spiral of socioeconomic decline over the Plan period. Indeed, the Council’s current preferred strategy of focusing the majority of growth at Canterbury would only serve to exacerbate the existing trend and socio-economic problems identified above. Additional growth at Whitstable will also provide both direct and indirect localised job creation, GVA and consumer spending during both the construction and operation phases.

1.31 For the District’s longstanding settlement hierarchy to be broadly maintained over the plan period, the total planned housing figure (between 27,400 and 30,400 dwellings) would need to be apportioned by around the current (2019) proportion of sub-area population. As outlined below, this approach would indicate Whitstable’s housing apportionment over the period 2020 to 2040 being between c. 5,754 and 6,384 dwellings:

Sub-Area	2019 Population <sup>1</sup>	2019 Proportion	Apportioned Housing Figure	
Herne Bay	41,235	25%	6,850	7,600
Whitstable	34,134	21%	5,754	6,384
Canterbury	56,945	34%	9,316	10,336
Rural Areas	33,080	20%	5,480	6,080
Canterbury District	165,394		27,400	30,400
<sup>1</sup> ONS MYE’s				

1.32 As set out below, to deliver between 5,754 and 6,384 dwellings at Whitstable over the plan period, we calculate that once existing commitments and allocations have been taken into account (c. 760 dwellings) that land to deliver between c. 5,000 and 5,625 dwellings will need to be allocated within the emerging Local Plan:

Canterbury Local Plan Representations continued

Sub Area	Existing Commitments / Allocations <sup>1</sup>	27,400 Dwellings		30,400 Dwellings	
		New Local Plan Allocations	Total Housing Figure	New Local Plan Allocations	Total Housing Figure
Herne Bay	3462	3,388	6,850	4,138	7,600
Whitstable	760	4,994	5,754	5,624	6,384
Canterbury	6436	2,880	9,316	3,900	10,336
Rural	1970	3,510	5,480	4,110	6,080
Total	12628	14,772	27,400	17,772	30,400

<sup>1</sup>Canterbury Local Plan 2017, Appendix 2

- 1.33 Given the above, it is demonstrable that in order to achieve a balanced approach to growth that secures a range of economic, social and environmental benefits across the District, significant additional allocations will need to be made at Whitstable as part of any growth option.
- 1.34 Furthermore, such growth at Whitstable will need to include urban extensions on greenfield sites that have the capacity to accommodate meaningful growth, green infrastructure and importantly a range of services and facilities on site. Such sites would also provide greater opportunities to accommodate the specific housing needs of Whitstable, which the Council's HNA advises is for 3 bedroom homes, noting that brownfield sites are likely to be more suitable for higher density development and therefore smaller 1 and 2 bedroom units.
- 1.35 In this context, land controlled by HLM at Brooklands Farm, Whitstable represents a wholly logical urban extension to the settlement that could accommodate 1,300 dwellings, including a significant proportion of 3 bedroom family homes, substantial green infrastructure, a 2 form entry primary school and local centres that include community facilities.
- 1.36 Overall, delivering appropriate levels of growth at the coastal settlements would:
- Maintain and strengthen the District's longstanding settlement hierarchy, through growth that is focused on the three key settlements of Canterbury City, Whitstable and Herne Bay
  - Support and unlock the District's economic growth potential, particularly culture-led and University based potential at Canterbury City and Whitstable
  - Deliver Herne Bay regeneration priorities and address pockets of regeneration through the District
  - Help to deliver local transport infrastructure, including an upgrade to the A28 road, a Park and Ride at Whitstable and other public transport and active travel measures through a mixture of CIL and other developer contributions.
  - Deliver improved biodiversity and open space and new and improved community infrastructure throughout the District.
- 1.37 Importantly, this approach would deliver the Council's draft strategic objectives for the CLP.

### Canterbury Focus A

- 1.38 Further to the above, we do not support this option as it would unduly focus growth at Canterbury but would do so without seeking to deliver any meaningful benefits over focussing growth at alternative locations, such as Whitstable. Accordingly, such an approach is wholly unjustified.

### Canterbury Focus B

- 1.39 This growth option appears to be the same at the Preferred Option, save for delivering reduced enhancements within the City centre. Please therefore see our comments in relation to the Preferred Option.

### Coastal Focus

- 1.40 We support this growth option. However, whilst it suggests that growth is focused at the coast and more limited development in Canterbury, the diagram would appear to suggest a fairly balanced level of growth at each of the three key settlements in the District.
- 1.41 As explained earlier in these representations in response to the Council's Preferred Option, the Coastal Focus could, amongst other things, help to ensure that sufficient housing is delivered to enable Whitstable and other coastal settlements to maintain their position in the settlement hierarchy and offer greater potential for maximising the scope for sustainable travel by co-locating jobs and homes, having regard to the Council's acknowledged shortage in employment floorspace in the area which must be addressed, particularly noting issues with employment allocations at Canterbury City, as outlined by the Council.
- 1.42 Indeed, the Council's EDTS outlines that the coastal towns of Herne Bay and Whitstable operate in a relatively self-contained manner as a property market sub-area in the District and include a more varied portfolio of employment floorspace relative to Canterbury City, with low levels of vacancy and room for expansion as some existing sites. Accordingly, the delivery of additional employment floorspace at the coastal towns plus meaningful growth through sustainable urban extensions, such as at Brooklands Farm, Whitstable, could help foster a highly sustainable and balanced growth strategy.
- 1.43 Furthermore, we note that this option would unlock the delivery of a new Park and Ride for Whitstable and enhanced bus services, further maximising scope for sustainable travel.
- 1.44 Finally, we note that the Council's Transport Modelling Report (TMR) 2021 concludes that this growth option would ensure that traffic remains in capacity on the network due to the benefits of the Park and Ride and that in terms of addressing congestion hotspots, it is one of the best performing options.
- 1.45 Overall, we support the Coast Focus growth option as this could deliver proportionate growth to Whitstable and other coastal settlements to maintain their position in the settlement hierarchy, support much needed additional employment floorspace and importantly offer greater potential for maximising the scope for sustainable travel by co-locating jobs and homes (noting the level of self-containment that exists) but also unlocking the ability to deliver a Park and Ride plus other enhancements for Whitstable. Land controlled by HLM at Brooklands Farm, Whitstable could play an important role in fulfilling/realising this.

### Rural Focus

- 1.46 This option would result in a dispersed approach to development that is unlikely to support any meaningful infrastructure delivery and instead put strains on existing services and facilities. Furthermore, and as the Council's Sustainability Appraisal notes, this growth option could exacerbate unsustainable travel patterns.

1.47 Given the above, we do not support this growth option.

### New Freestanding Settlement

1.48 There is a wealth of evidence demonstrating new settlements often require significant lead-in times due to a range of factors including complicated land assembly and the need to deliver critical on-site infrastructure. As a result, they typically carry greater risk (than smaller sites or urban extensions) in terms of delivery timescales.

1.49 Given the above, we do not support this option and would suggest that the Council adopt a more balanced approach to growth, including sustainable mixed use urban extensions.

### Summary

1.50 In summary, we support the Council's approach to deliver a higher level of housing growth than the Standard Method minimum to support economic growth and deliver local transport infrastructure. However, the District's economic growth potential is not only focused at Canterbury City, but also within the District other key settlements of Whitstable and Herne Bay. Furthermore, there is presently insufficient evidence to demonstrate that such high levels of growth and infrastructure provision at Canterbury City can be delivered within the Plan period.

1.51 We therefore consider that the growth strategy could continue to allocate growth to Canterbury City, as the principal settlement in the District, but with meaningful and proportionate growth at Whitstable and Herne Bay.

1.52 Importantly, this would deliver a more balanced, deliverable and sustainable growth option, which would fulfil the strategic objectives identified in the CLP.

## 2. Town centre strategies

### Whitstable issues and opportunities

1.53 The Retail and Leisure Study (RLS) 2020 outlines that there are weaknesses that need addressing to maintain Whitstable centre's healthy status and to further strengthen its position in the wider hierarchy. In this regard, the RLS identifies that the key issues are high levels of congestion in the High Street and Oxford Street which disrupts the bus services that serve the town. It also notes that there is a lack of cycle routes linking the centre to surrounding areas.

1.54 Accordingly, the CLP identifies that a key aspiration will be to lower traffic levels through the centre, to significantly improve the pedestrian environment and air quality. However, based upon the Preferred growth option it is unclear how this will be achieved, in particular reducing traffic levels as the CLP suggested that a new Park and Ride would only be delivered through the Coastal Focus option. Changing the growth option to Coastal Focus or modifying the Preferred option to include a hybrid approach with greater growth at Whitstable (and other coastal settlements) could then support the Park and Ride (plus other local sustainable travel enhancements) unlocking a more extensive and balanced array of benefits for the District.

1.55 In this context, land at Brooklands Farm, Whitstable could deliver a significant quantum of new homes which in turn would generate the associated financial expenditure to help sustain or enhance existing retail and leisure facilities in the area, including further complementing the retail

offer. It could also offer proportionate financial contributions to unlock the strategic highway infrastructure improvements that are necessary in Whitstable to address weaknesses in the existing town centre, as identified by the Council's RLS.

### 3. Housing and new communities

#### Making sure the right types and tenures of housing are provided

- 1.56 We understand the logic for Option HNC1C being preferred by the Council, however we are concerned that it could result in a plan that is too detailed and rigid, noting that specific housing needs continually change. In order to strike an appropriate balance, it is recommended that Option HNC1A i.e. the current approach is maintained to keep flexibility but potentially that categories of certain sites (such as higher density urban sites) are provided with a broad expectation of mix, such as providing a greater proportion of smaller units but equally that greenfield sites, such as Brooklands Farm, Whitstable can accommodate a broader range of housing sizes and types, in particular family homes that are in highest demand at Whitstable.

#### Providing opportunities for small and medium sized housing developments

- 1.57 Paragraph 69a of the NPPF requires that at least 10% the housing requirement should be delivered on sites of no more than 1ha. Any option pursued would therefore clearly have to comply with this requirement. The CLP proposes to prioritise the delivery of smaller sites but smaller sites (even including those with capacity to accommodate a few hundred homes) do not typically provide much if any on-site infrastructure.
- 1.58 Whilst we fully support the provision of sites to increase opportunities for SMEs, it must also be remembered that larger scale growth, for example urban extensions, offers the clear sustainability benefits associated with being close to the existing built up area and sufficient critical mass such that they can deliver on-site infrastructure, but generally reduced deliverability concerns when compared to new settlements.
- 1.59 Such sites could also deliver a substantial quantum of market and affordable homes in a range of sizes and types to respond to the needs of specific groups, plus extensive access to high quality green spaces and recreational areas, promoting health and well-being. Visions can then be established that sets out how a high-quality place for people to live can be delivered, that is well-designed, integrated with the existing community and importantly providing convenient access to a range of services and facilities, including new infrastructure, as required
- 1.60 Overall, it is clear that small deliverable sites will have to form part of the overall strategy to help deliver the housing requirement and align with national policy. However, to maximise the delivery of sustainable and high quality development, these must be complemented by larger sized sites as well, such as land controlled by HLM at Brooklands Farm, Whitstable, which could support multiple developer outlets, including smaller and medium sized housebuilders alongside large housebuilders.

### Making sure that the right densities are delivered in developments across the District

- 1.61 We would support in principle the approach of identifying densities areas and/or allocations to provide certainty however this must be balanced against the fact that a local plan process cannot and is not required to scrutinise the appropriateness of density in the same level of detail as can be achieved through a planning application and the development management process. Accordingly, any references to density should be a guide and maintain flexibility.

### Supporting sustainable living in new communities

- 1.62 We would support and fully agree that strategic scale development has the potential to support new social and community infrastructure and that this should be required of such sites. Indeed, land controlled by HLM at Brooklands Farm, Whitstable could accommodate a range of such facilities including a primary school, local centres and community facilities.
- 1.63 We also agree that proximity to new and existing key services is an important consideration and that they should be accessible by a 15 minute walking or cycling time, however clearly such a requirement must be applied and assessed in a holistic and pragmatic manner.

### Making sure all design is high quality

- 1.64 We support Council Preferred Option HNC7C and HLM would welcome the opportunity to develop a masterplan for land it controls with the Council and wider stakeholders.

### Delivering low carbon and energy efficient housing

- 1.65 HLM wholly support the need to tackle climate change and that reducing carbon emissions of development is a critical aspect of this. We note that the Council's preferred option HNC8C requires all homes to be delivered to net zero and in this context we are aware that the Council has declared a Climate Emergency with a target to get to net zero carbon emissions by 2030.
- 1.66 HLM would seek to support the Council as far as is reasonably practicable in this regard, but given the ambitious nature of the policy, it would be important to understand what work the Council has undertaken to establish that this is realistic and deliverable and also provide details relating to how the 'District Decarbonisation Fund' would operate before we can comment further.

### Incorporating renewable energy within new developments

- 1.67 Preferred Option HNC8K proposes to require all large or strategic development to provide decentralised energy supply and maximising use of renewables.
- 1.68 As outlined earlier, HLM fully support the need to move to low or zero carbon energy solutions but would question whether a traditional decentralised energy approach is the best strategy to achieve this, particularly for low/medium density urban extension schemes for which decentralised schemes seldom prove feasible. In particular, it should be considered that the requirement for all-electric solutions for heating and cooling within homes can help with decarbonisation, particularly with energy being supplied from the grid via sustainable sources. We also consider that emphasis should be on reducing energy consumption through building design and then focusing upon the potential for some energy from renewable sources, such as solar panels or ground / air source heat pumps.

- 1.69 Accordingly, HLM wholly supports the Council's general objectives in respect of renewable energy provision but would suggest some modifications to the approach would be appropriate.

#### Providing housing for older people

- 1.70 We support preferred option HNC9C and agree that large or strategic sites provide the best opportunity to accommodate a range of housing needs, ensuring balanced and sustainable communities are created. Indeed, land controlled by HLM at Brooklands Farm, Whitstable has the potential to accommodate the complete spectrum of housing tenure and mix to meet a variety of needs.

#### Supporting opportunities for self and custom-build housing

- 1.71 We support preferred option HNC13C and agree that large or strategic sites provide the best opportunity to accommodate a range of housing needs such as for self-build and custom-build housing where feasible and need exists, ensuring balanced and sustainable communities are created.

#### Maximising the benefits of strategic infrastructure investment

- 1.72 We support preferred option HNC14B and consider that strategic sites in particular provide the best opportunity to ensure that the necessary strategic infrastructure for the District is provided, whether that be on-site or off-site through financial contributions. In this context, strategic sites such as Brooklands Farm, Whitstable can offer a greater ability to support the delivery of strategic infrastructure when compared to a large number of smaller sites, in particular brownfield sites that can suffer significant abnormal costs through remediation of contaminated land, for example.

#### Making sure that infrastructure is delivered at the right time to support development

- 1.73 We support preferred option HNC16C and consider that strategic sites provide the best opportunity to ensure that the right infrastructure is provided at the right time. As outlined in the Vision Document submitted in support of these representations, land controlled by HLM at Brooklands Farm, Whitstable is of a scale that could accommodate an extensive range of infrastructure to support the residential development but also unlock benefits for existing residents.

### **4. Employment and the local economy**

#### Ensuring that enough business space is provided in the right locations to support growth

- 1.74 We consider that there is a significant lack of clarity at this stage regarding the proposed approach to employment and economic growth, including how this aligns with the various housing growth options.
- 1.75 Notwithstanding the above, we would generally support preferred option EMP1C but would go further as to say that a full review of the employment floorspace strategy is required. It is demonstrable through the Council's EDTS that the existing strategy is out of date and no longer fit for purpose, for example with allocated sites facing major deliverability issues and other sites failing to align with market requirements. The NPPF is clear that in such circumstances, planning

policies should reallocate the land for more deliverable uses (paragraph 123a) and therefore new sites will need to be identified.

- 1.76 In this context, the EDTS identifies the strong position of Whitstable in terms of the take up of existing employment provision and consequent shortage of industrial space.
- 1.77 Overall, the CLP must fundamentally review the approach to employment land provision and develop a strategy that positively and proactively encourages sustainable economic growth (paragraph 82a of the NPPF). Furthermore, the strategy should seek to minimise the number and length of journeys needed for employment (paragraph 106a of the NPPF) for example through the location of housing-led development in areas where employment land demand prevails, such as Whitstable and thus Brooklands Farm, Whitstable is clearly well placed in this regard.

#### Improving the accessibility and connectivity of employment areas

- 1.78 We generally support preferred option EMP4C in so far as requiring strategic sites to accommodate a sustainable mix of uses, including some commercial floorspace. This does however need to reflect market demand and ensure it is flexible enough to cater for different scenarios, for example where new commercial floorspace could undermine an existing employment park in close proximity to a site.

### 5. Town centres and local facilities

- 1.79 The CDLP identifies at paragraph 4.9 that the Whitstable and Herne Bay District Centres fulfil a complementary role to Canterbury City Centre in the established retail hierarchy. It goes on to state that "*They serve the local population and ensure a sustainable focus and pattern for development and their position within retail hierarchy will continue to ensure they have opportunities to enhance and strengthen this function.*"
- 1.80 The RLS outlines that Whitstable's town centre is in good health but that it does have some weaknesses for which a tailored strategy can be developed.
- 1.81 However, a critical element to any strategy will be to ensure that sufficient housing growth of the right type is planned in and around locations such as Whitstable to ensure that existing communities can remain in the area and that new residents can move in. This will ensure that settlements retain a diverse range of households, retain existing services and facilities (or add to them through development) and therefore maintain their position in the settlement hierarchy.
- 1.82 Allocating increased growth at Whitstable, for example through a sustainable urban extension at sites such as Brooklands Farm, would offer sufficient critical mass to deliver a meaningful benefit to the existing town.

### 6. Movement and transport

#### Maximising active travel in the District

- 1.83 HLM support preferred option MT1B.

- 1.84 Strategic sites, such as land controlled by HLM Brooklands Farm, Whitstable, can provide opportunities to deliver significant housing on the edge of the most sustainable settlements in the District.
- 1.85 This Site is located within walking and/or cycling distance of a range of services and facilities, including retail, convenience and employment facilities as well as recreational facilities, primary and secondary schools and a range of healthcare services. However, and as set out in our submitted Vision Document, large scale sites such as Brooklands Farm, Whitstable, offer scope to deliver new local centres, primary school or other services on-site. They can also offer substantial green infrastructure to the benefit of existing and new residents, promoting healthy communities and sustainable travel.

#### Supporting greater use of public transport in the District

- 1.86 We support the preferred options identified.

#### Supporting the rapid transition to zero emissions vehicles

- 1.87 HLM fully support the transition to zero emissions vehicles as a vital tool to tackle climate change. We note the Council's preferred option (MT3B) which would require all off-street parking spaces to have active charging points. Whilst HLM has no objection in principle to this approach, any policy would need to cater for the capacity of the grid to accommodate this strategy and confirmation of feasibility.

## 7. Historic and natural environment

#### Protecting and enhancing biodiversity and green and blue infrastructure (parks, rivers and other spaces)

- 1.88 HLM fully support the need to protect and enhance biodiversity and consider that strategic sites, in particular, offer the potential to deliver significant biodiversity gain. Nevertheless, the transition to an impending legal requirement for 10% net gain via the Environment Bill will already represent a step change which will, in some cases, create challenges.
- 1.89 Accordingly, whilst HLM support the notion of seeking to maximise biodiversity net gain, we would simply question whether the Council has evidence that requiring a 20% enhancement on sites is deliverable, taking into account viability considerations.

#### Making sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscape

- 1.90 HLM fully support preferred option NE4K.
- 1.91 The Council Local Landscape Designations: Review and Recommendations Report (2021) is clear that it is no longer appropriate to retain the Blean Woods LLD boundary as it is currently drawn and instead the boundary should be drawn southwards along New Thanet Way (A299) which essentially marks the valley floor. As local designations need to be informed by up to date evidence, we support this conclusion and proposed approach, with further commentary outlined in the submitted Vision Document.

### Nutrient Neutrality - Stodmarsh Designated Sites

- 1.92 Whilst not specifically referenced in the CLP, a very significant part of Canterbury District, including the whole of Canterbury City itself, is within the drainage catchment of the Stodmarsh European Sites that have the highest level of ecological protection as a 'Special Protection Area', 'Special Area of Conservation' and 'Ramsar'.
- 1.93 Natural England is raising objection to all new residential development in this extensive area unless nutrient neutrality can be demonstrated, because of the in combination effect that increased levels of nutrients from such development (arising from additional foul water from population growth) is having on the Stodmarsh European Sites' favourable conservation status.
- 1.94 However, this issue does not affect Brooklands Farm, Whitstable as it is part of a different surface water catchment, as confirmed in Natural England guidance (Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites - For Local Planning Authorities July 2020). Accordingly, the Council may require greater reliance on sites in sustainable locations that are outside the sensitive drainage catchment area than the preferred strategy currently assumes.