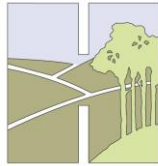


**Canterbury District Local Plan 2040
Preferred Options Representation
August 2021**

1. Introduction

- 1.1 This representation has been prepared by Hallam Land Management (HLM) and our interest in land to the west of Whitstable Road, Canterbury (see site plan at Appendix A) to provide approximately 120 new homes. It is submitted in response to Canterbury City Council's draft Local Plan 2040, the Preferred Options consultation which ends on 09 August 2021.
- 1.2 This representation confirms that a residential-led development at the site could provide approximately 120 new homes and should form part of the District's spatial strategy for accommodating its future growth requirements through a proposed allocation for residential development.
- 1.3 The proposal would represent a natural extension at the north west of Canterbury city in a sustainable location close to public transport services and local facilities. The scheme has the potential to deliver several significant social, economic and environmental benefits for the local community.
- 1.4 The site is considered suitable for the provision of residential development and that there are no overriding environmental or technical constraints.
- 1.5 The structure of this representation is as follows:
 - Section 2: Draft vision and growth options
 - Section 3: Meeting Housing Needs
 - Section 4: Movement and Transport
 - Section 5: Historic and Natural Environment



2. Draft vision and growth options

- 2.1 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. Should the existing Local Plan become more than five years old prior to the adoption of the emerging Local Plan the Standard Method may be greater than is currently indentified. 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.
- 2.2 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, being some 9,000 additional dwellings on top of existing commitments/allocations in the existing Local Plan.
- 2.3 The proposal would help deliver the strategic aspiration to centre growth and investment at Canterbury city by providing high quality new homes, including affordable, meeting a range of local housing needs. The proposal would help the District provide an extra 14,000 to 17,000 new homes by 2040 and contribute directly towards maximising Canterbury’s economic potential as well as providing investment towards improving local transport infrastructure and services. We fully support the Council’s preferred approach in the context of significantly exceeding the Government’s Standard Method minimum in order to support economic growth and extra investment in local transport infrastructure.
- 2.4 The site is in a highly accessible and sustainable location within easy walking distance of the Blean Primary School and Kent College, as well as bus services on Whitstable Road. It also sits at a potential key nodal point where proposed pedestrian, cycle, bus and car routes meet providing opportunities for multi modal shift to encourage journeys to be made by non-car modes (see Figure 1 below).
- 2.5 The proposal can make an important contribution to meeting the District’s growth needs under all of the scenario options and should form part of the proposed spatial strategy, which ever option or version of it is taken forwards.

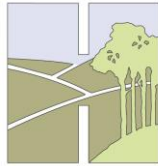
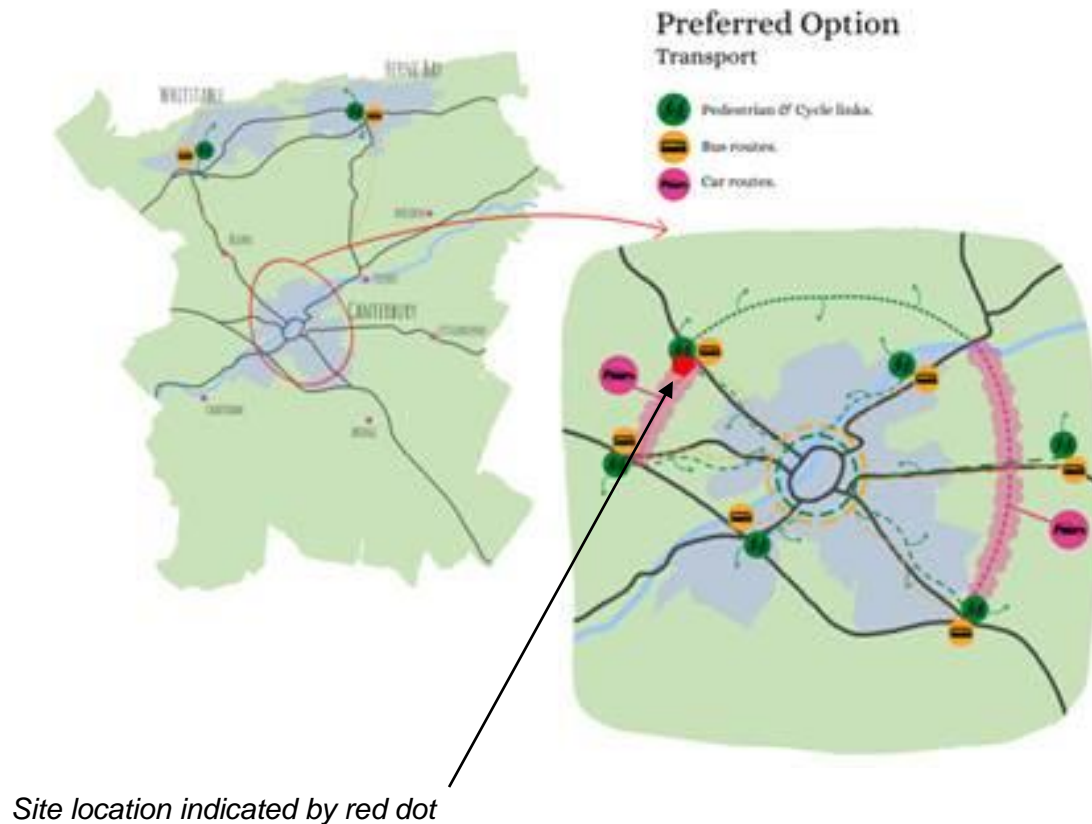
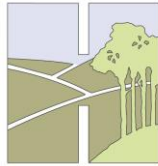


Figure 1: Site's location at proposed transport nodal point



3. Meeting housing needs

- 3.1 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.
- 3.2 Whilst the strategic sites that are allocated in the local plan are not currently delivering at the rate that was anticipated, they still have an important role to play in helping meet the District's future growth needs in the new Local Plan and will continue to be an important part for housing delivery across the next 20 years of the plan (2020 – 2040). That said, the proposal at this medium sized has an important role to play in helping to ensure a robust and deliverable supply of land for the provision of new homes, as well as promoting choice and competition in the market.



3.3 Importantly, the provision of new homes at the site provides the following benefits:

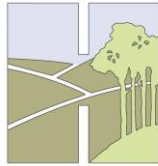
- The provision of 120 new homes, including market and affordable, assisting the District in meeting or exceeding its local housing need (LHN);
- Contribute towards demonstrating a deliverable supply of new homes in the first five years of the plan-period;
- Meeting the LHN entirely within the District;
- Providing an appropriate mix, type and tenure of homes, including three beds that the Housing Needs Assessment (HNA) (2021) reveals a particularly acute need for, ensuring a more balanced supply in housing provision; and
- Providing family homes on greenfield land at the edge of Canterbury.
- Opportunity to deliver local community benefits to support Blean School specifically, with parking provision for the current school or additional parking for a potential new nursery.

3.4 It is important that the emerging Local Plan allocates medium sites like this to provide certainty that a supply of new homes can be maintained throughout the plan period rather than relying on smaller or medium sites coming forwards speculatively as windfall development. A reliance on windfall would undermine the ability to properly plan for the infrastructure that would be required to support growth in the most sustainable locations.

3.5 The proposal could provide 120 new homes at a density of 35 dph. Not only would this enable the full development potential of the site to be realised in line with NPPF Para 125, whilst ensuring a suitable design response that is appropriate for its suburban setting, it would encourage more trips to be made by non-car modes given its location near the proposed multi modal nodal point.

4. Movement and transport

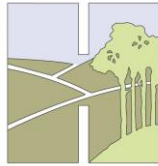
4.1 The site is in a highly sustainable location and the proposal supports the aspiration to promote great use of public transport given its location close to existing bus services and potential future pedestrian, cycle bus routes to the north of Canterbury.



- 4.2 Given the sites location adjacent the key nodal point for proposed pedestrian, cycle, bus and car routes, the land use should be maximised to take advantage of the highly sustainable location and HLM are of the opinion a minimum density of 35 dwellings per hectare would be suitable in this location.

5. Historic and Natural Environment

- 5.1 The proposal can provide a suitable response to the site's partial location within the Blean Woods area of high landscape value (AHLV) through a landscape led approach to the masterplan. This will help to ensure an attractive environment that retains and strengthens, where necessary, existing landscape features on site. This approach will provide opportunities to secure a number of environmental and social benefits, including biodiversity net gain, habitat and species enhancement, opportunities for recreation and promotion of health and wellbeing.
- 5.2 It should also be noted the site is not adjacent to the Blean Woods National Nature Reserve and is separated by a tree belt as well as intervening fields / paddocks to the north west. Notwithstanding this gap, the landscape led approach to the masterplan will help to ensure that the setting of the woodlands is maintained.
- 5.3 The proposed local landscape designation of the western part of the site (NE4H – Blean Woods) is not supported. The site's character is heavily influenced by its suburban location that comprises surrounding urban and built development, including houses, roads, sports facilities and a large telecommunications mast to the west. Whilst the site is greenfield it is not open or attractive countryside noting its deteriorated condition resulting from heavy use as a paddock, advertising boards located close to the road and hard surfaced path that runs through it. Given the site's suburban setting, condition and proliferation of built development in the area it is considered to have a low landscape value.
- 5.4 Although within the Green Gaps and Local Green Spaces Review (2021) it didn't recommend any changes to the boundary of the Blean and Rough Common Green Gap, it was identified that *'some of the areas at the edge of the designation are not open countryside'* and HLM would be of the opinion that this Green Gap is weak in function and on the ground (as the Inspector acknowledge in the Adopted Local Plan 2017 *'includes land that is not easily seen from Whitstable Road'*). For the following reasons below, HLM are of the opinion this Green Gap should be further reviewed, revised, and potentially removed altogether.



- 5.5 The proposed Green Gap designation of the eastern part of the site (NE4H – Blean Woods) is not supported. Whilst there is a physical gap on the western side of Whitstable Road between Blean and Rough Common this does not effectively provide a sense of separation between the two settlements. In considering the gap, it is important to note that the experience of moving between Blean and Rough Common along Whitstable Road is heavily influenced by the row of houses on the eastern side of Whitstable Road directly opposite the site. These houses effectively run opposite the full length of the ‘physical gap’ on the western side. The effect of this is that when one travels along Whitstable Road there is always built form on at least one side of the road for its entire length. There is no sense of leaving or arriving at entirely and clearly separated settlements.
- 5.6 Further, the site’s suburban / peri urban character, as outlined above, does not create a sense of moving through a countryside setting when the site is viewed from Whitstable road or along the public footpath through the site. However, there are opportunities for the masterplan to enhance the relationships between the site, and the footpath and Whitstable Road through providing strong frontages and incorporating attractive landscape features. This will help to ensure that journeys along these routes are through an attractive environment.
- 5.7 The masterplan could also carefully consider the siting and layout of new homes and open space to ensure an appropriate response to the southern edge of Blean and northern edge of Rough Common, whilst helping to maintain their individual identities as far as possible. The appearance of buildings in these locations could also respond to the specific vernaculars found in each of these locations.