

Canterbury City Council Local Plan

Preferred Options Consultation

**Representations on behalf of Chartham Parish
Council**

2nd August 2021

Chartham Parish Council wishes to respond to the Preferred Options consultation published by Canterbury City Council in July 2021. Chartham Parish Council is committed to ensuring sustainable development in the Parish as well as protecting the countryside setting of its settlements. In a process of Localism we are developing a Neighbourhood Plan.

Growth Options

Chartham Parish Council does not agree with the Council's preferred growth option and instead supports Canterbury Focus A. Councillors do not consider that the increased number of housing (up to 17,000 compared to 9,000) is sustainable and feel the additional housing would negatively impact on rural parishes by changing the character and identity of rural communities through the removal of green gaps and other community spaces.

Whilst the Parish Council understands the thought process behind the proposal to make more radical changes to the transport network, have these changes been fully costed to ensure they are viable? The consultation infers that developer contributions will be put towards these upgrades but funding is also required to mitigate the impact of developments on the immediate local communities by requiring provision of doctor surgeries, community centres, schools, etc.

The A28 bypass for example will be very expensive. Is this project financially viable from developer contributions whilst ensuring funding from developments is also spent on community provision? If dependant on a certain portion from government or other third party funding to meet the final costs, what happens if this funding is not forthcoming? The improvements highlighted in the consultation will be crucial to better accommodate the massive increase in vehicle movements in the preferred option. Should the key projects such as the bypass not be financially viable, will the Council still be committed to providing up to 17,000 homes? If so, Canterbury is likely to be completely gridlocked during busy periods such as rush hour and school pick up/drop off times to the detriment of all local residents, both in the city centre and the rural parishes.

Issue HNC5. How should we make sure housing is provided for rural communities?

- 1.1. Chartham Parish Council are in the process of preparing a Neighbourhood Plan. The vision for the Plan is that *"In 2031 we will be known as a friendly, rural, sustainable community spread across our distinct settlements in a beautiful quiet countryside setting."*
- 1.2. The Neighbourhood Plan is looking to regenerate land and anticipates it will include an element of housing.

- 1.3. We request active collaboration, with CCC actively engaging with communities writing a Neighbourhood Plan as they are best placed to know where housing should be located.
- 1.4. We would be happy to enter a Memorandum of understanding to agree how housing can come forward between the emerging Local Plan and our Neighbourhood Plan.
- 1.5. Option HNC5C (preferred option) suggests “rural service centres” have capacity to accommodate more growth. Moreover, there are various other development options which rely to varying degrees on growth in rural areas, notably the Rural Focus option, which refers to growth in sustainable rural areas.
- 1.6. The Parish is concerned however that the settlement hierarchy in the district is in need of more substantial revision. In particular, the criteria used appears to be narrow, relating only to the functional role that each settlement plays.
- 1.7. Identifying a village as a service centre or hub has implications in terms of establishing its sustainability in planning policy terms. These areas are, by definition, considered more capable of accommodating growth. Whilst preferred option TCLF4B to “*designate village centres to protect and improve existing services and facilities in the rural settlements*” looks at the need to retain rural shops and services, Option HNC5C directs new growth to rural service centres.
- 1.8. It would appear inconsistent (given the consequences of the settlement hierarchy) to ignore the potential constraints on such growth when considering the criteria for establishing which settlements should fall within which category.
- 1.9. The Parish considers that it is important to consider the physical constraints of each settlement before categorising them. The City Council consider that local facilities and services contribute to local settlement identity (Rural Settlement Study (2020)): The Parish considers that their landscape setting and historic character do likewise, and should be considered alongside a review of services and facilities.
- 1.10. At Chartham village for example, the flood plain of the Stour presents a significant constraint on peripheral growth, in addition to the need to maintain its important landscape character.
- 1.11. The City Council refer to the service centres, rural hubs and villages as the “*more sustainable rural settlements*.” However, have the Council properly considered the consequences of these settlements being so regarded, if wider development constraints have not been factored in to the options? The spatial assessment of the district is at risk of being rather one-dimensional without acknowledgement of settlement sensitivity across the district.

1.12. The existing Local Plan categorises rural settlements as follows:

Hamlets

Villages

Local Centres

Rural Service Centres

1.13. Currently, Chartham (including Shalmsford Street) is listed as a Local Centre and Chartham Hatch as a Hamlet. The housing area developed at St Augustine's is not identified in the settlement hierarchy.

1.14. The Rural Settlement Study (2020) is part of the evidence base for the Canterbury City Local Plan 2040. The Preferred Options Consultation presents the rural hubs and service centres as settlements offering a range of key facilities which allow residents to meet many of the day-to-day needs in these settlements. The Study says the facilities and services contribute to the identity of each settlement.

1.15. The hierarchy now proposed is as follows:

Hamlets

Villages

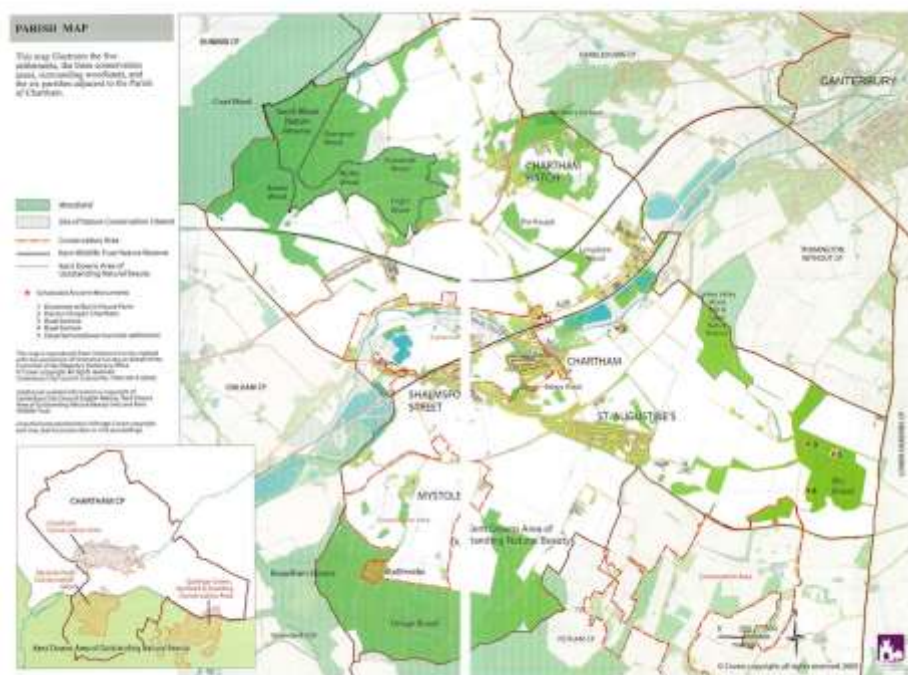
Local Centres

Rural Service Centres

Rural Hubs

1.16. It is noteworthy that most of the settlements previously regarded as "Local Centres" have now been re-designated as Rural Service Centres. This implies improved sustainability, with the settlements "moving up" the hierarchy. However, in practice (certainly in Chartham) the range of facilities has not improved. The re-designation is therefore misleading, implying improving sustainability. At the very least, this terminology should be changed.

- 1.17. In the Chartham Parish Design Statement's Parish Plan is identified as having 5 settlements: Chartham, Chartham Hatch, Shalmsford Street and St Augustine's.



- 1.18. The Parish Council ask that St Augustine's be recognised as a separate settlement. The implication at present is that this area falls to be considered as part of the settlement of Chartham. In fact, the housing here was approved on the basis of the redevelopment of the former hospital lands, rather than it being an extension of Chartham. It is therefore more properly regarded as separate, and ought to be categorised as a hamlet or small village.
- 1.19. Indeed, St Augustine's shares little characteristics with the main settlement of Chartham.
- 1.20. The Landscape Character and Biodiversity Appraisal (October 2020) is part of the Local Plan 2040 Evidence Base. The Appraisal identifies Chartham and Shalmsford Downland as a Landscape Character Area (see Figure 1). The Landscape Character Area includes St Augustine's but does not include Chartham village.
- 1.21. The Landscape Character and Biodiversity Appraisal (October 2020) notes the landscape of the Chartham and Shalmsford Downland as having important natural and cultural influences. It is clear from the appraisal that The Chartham and Shalmsford Downland Character Area is an important landscape for views across the Kent Downs AONB. In fact, the Downland character area is an extension from the Kent Downs AONB which lies directly south. Chartham is more properly associated with the base of the valley of the Great River Stour.

- 1.22. St Augustine's has a limited provision of services; there is a convenience store, hairdressers and a pub/restaurant. The Rural Settlement Study (2020) identifies five key services: primary school; convenience store; community hall; GP Surgery; and nursery or pre-school. One of five key services is located at St Augustine's. The Rural Settlement Study says locations with at least one service (either key service or other service) should be identified as villages.
- 1.23. The Parish is characterised by distinct settlements. An effective settlement hierarchy will ensure that they should remain distinct.

I3: Chartham and Shalmsford Downland

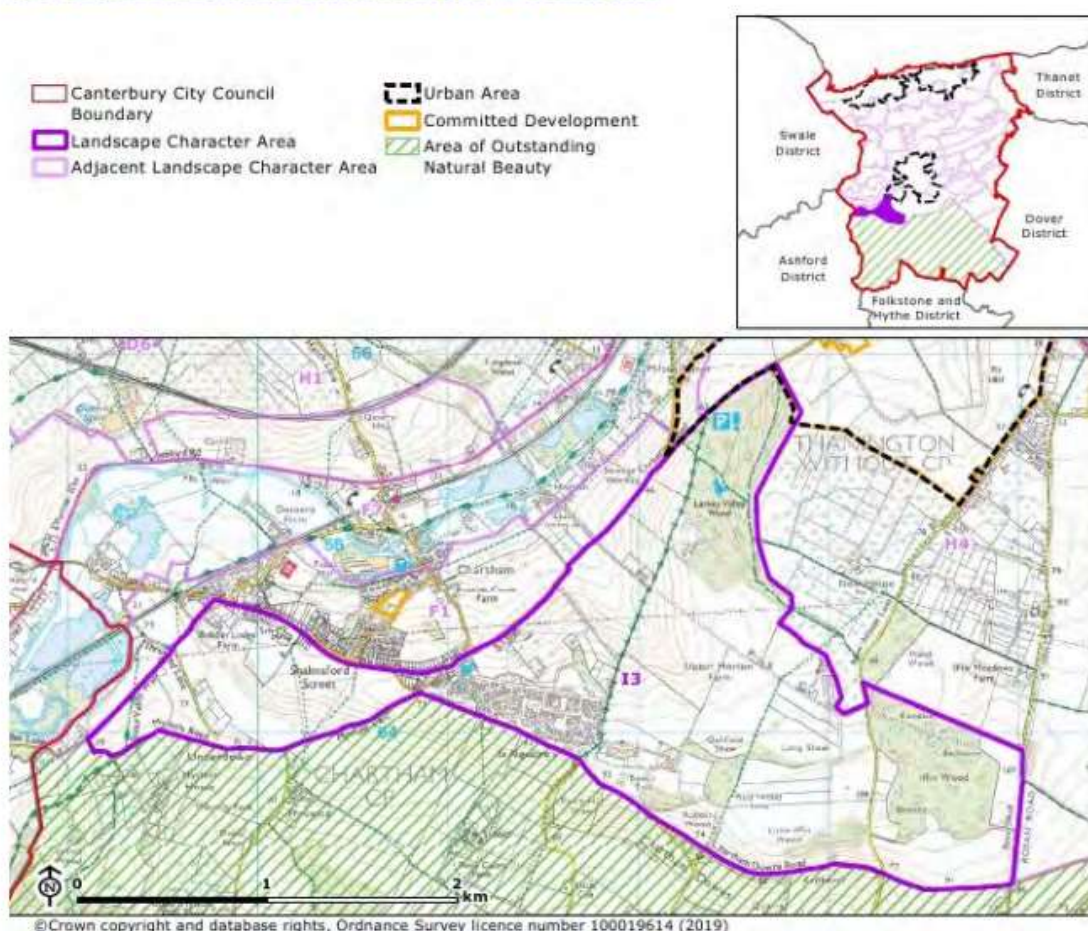


Figure 1: Chartham and Shalmsford Downland. Source: Canterbury Landscape Character Assessment and Biodiversity Appraisal (October 2020)

Historic and Natural Environment

Issue NE3: How should we protect and enhance biodiversity and green and blue infrastructure?

- 2.1. The City Council has noted several types of green infrastructure, which is helpful. However, the important existing (and potential future) contribution of hedgerows has been overlooked. The Council has emphasised the importance of biodiversity net gain (“BNG”), but in order to achieve the net gain, the Council should look for opportunities across all types of green infrastructure (particularly existing green infrastructure capable of enhancement and further growth).
- 2.2. The interconnectivity of hedgerows helps to deliver important and widely-acknowledged benefits for wildlife, as well as the wider landscape. The Parish Council is alarmed at the loss of trees and hedgerows as a result of development at Thanington. The Landscape Character and Biodiversity Appraisal (October 2020) comments on the importance of hedgerows in the Chartham and Shalmsford Downland Landscape Character Area, highlighting that, “*the woodland blocks and hedgerows provide a sense of enclosure and a strong landscape framework.*” However, the Appraisal acknowledges that “*post wire fencing has replaced some hedgerows resulting in a loss of the historic field pattern.*” This is an obvious opportunity for achieving BNG in the future, and an approach which has the potential for achieving positive landscape benefits as well as ecological ones.
- 2.3. The approach promoted above is entirely consistent with the Landscape Character and Biodiversity Appraisal (October 2020), which includes a number of landscape guidelines and key habitat opportunities, one of which is the establishment and maintenance of hedgerows along roadsides and along historic field boundaries. It is important that the Council acknowledge the importance of the hedgerows as a method of increasing biodiversity interest. This is important to our Parish as part of its countryside setting that is so valued locally.

Issue NE4: How should we make sure that the local landscape designations (Areas of High Landscape Value) continue to protect our valued landscapes?

- 3.1. Existing Local Plan Policy LB2 aims to preserve and enhance the distinctive landscape identified in the Canterbury District Landscape and Biodiversity Appraisal and the Kent Landscape Assessment. The rationale for doing so is based on the important archaeological, historical, and ecological associations that stem from these landscapes.
- 3.2. The existing Local Plan Proposals Map defines five Areas of High Landscape Value (AHLV).
- 3.3. One of the existing AHLVs covers land between Chartham and Thanington (see Figure 1 below).

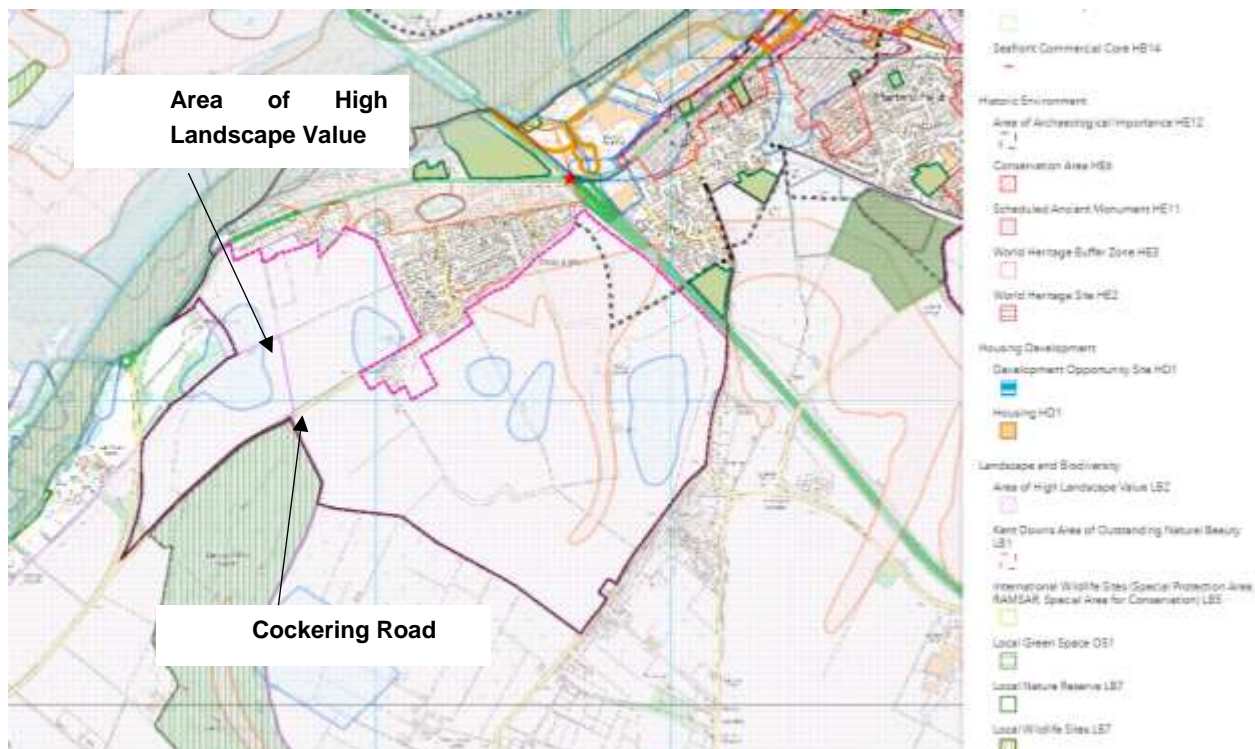


Figure 1: Extract from the Canterbury City Local Plan Proposals Map 2017. Policy LB2 (Area of High Landscape Value) shown dotted purple. Our annotations.

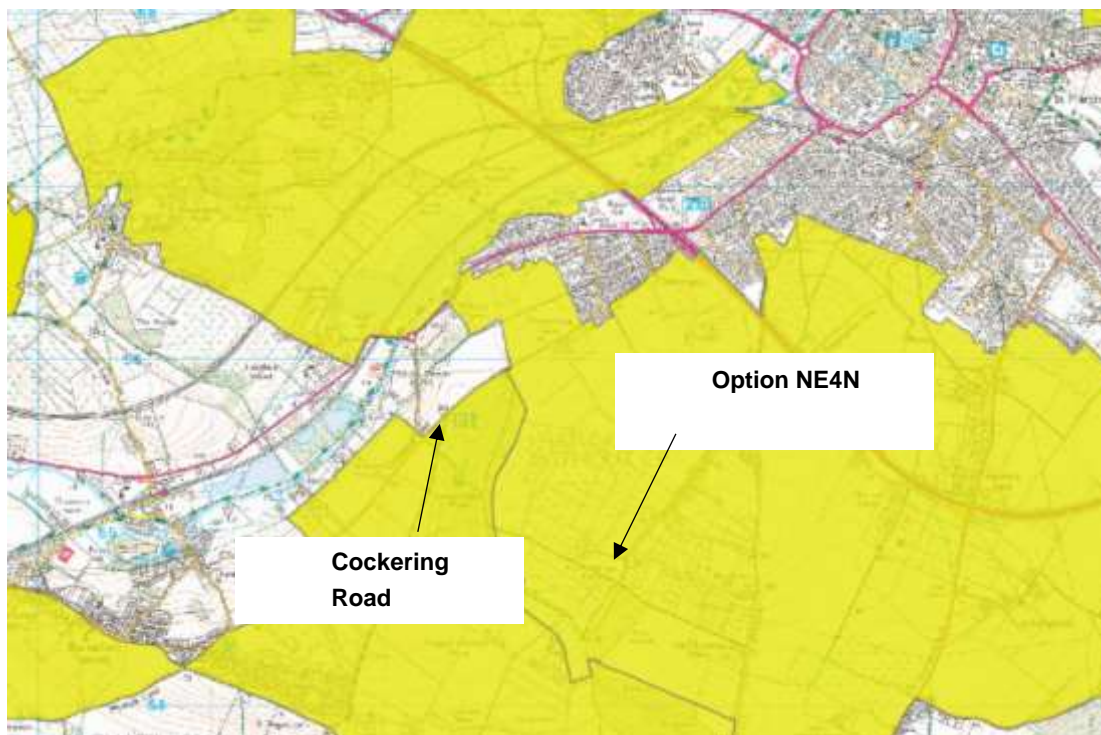


Figure 2: Extract from the Preferred Options Map. This figure demonstrates the Option NE4N for Landscape currently protected under Canterbury AHLV. Our annotations.

- 3.4. The Canterbury City AHLV Review for Local Landscape Designation Report (January 2021) identifies concerns with the Canterbury AHLV. The Preferred Option (NE4O) is to delete it and introduce a softened “*criteria based approach setting out considerations like views.*”
- 3.5. The other option contemplated (NE4N) is to downgrade the AHLV as “*a new and different type of landscape designation*”. Under this option, there would be no landscape or heritage recognition, rather it would be an “*area valued for the role that the landscape plays in views and the setting of the city*”. The area so regarded would extend over the lands coloured yellow in Figure 2 above.
- 3.6. The AHLA is an important buffer for Chartham Parish, working in combination with the adjacent North Downs AHLV.
- 3.7. The Preferred Option (NE4F) would recast the North Downs AHLV as the North Downs Local Landscape Designation (LDD), but excluding areas covered by the existing AONB.
- 3.8. The Landscape Character Assessment and Biodiversity Appraisal (October 2020) defines various Landscape Character Areas. A new LCA known as F7: Stour Valley West has been defined, merging the two flat river valley areas at Chartham and Wincheap/Thanington. The F7 LCA runs along the river valley. The appraisal includes a number of positive comments in relation to glimpsed views to the Cathedral, as well as a sense of enclosure in a small scale landscape.
- 3.9. The report makes development management recommendations, including that new building proposals within adjacent urban and suburban areas should “*ensure that an attractive and integrated edge is formed with this rural and open recreational landscape. This is important for existing edges as well as the new strategic allocations at Cockering Farm. Design of this development on the adjacent slopes should consider views from the valley and views to and from the city. Physical access into the Larkey Valley Woods SSSI (within I3) should be minimised to avoid an increase in visitor numbers*”. These guidelines are welcomed.
- 3.10. The Parish Council remains concerned however at both the Preferred Option (NE4O) proposing the deletion of the Canterbury AHLV, and Option NE4N proposing a downgrading. The Preferred Option is not supported. Option NE4N is preferred, although no change (thus retaining the Canterbury AHLVA as a LDD) would still be the Parish’s preference.

- 3.11. The rolling-back of a local landscape designation of this kind seems completely out-of-kilter with the direction of travel nationally. Our population is engaging now more than ever with the landscape on their doorsteps. To downgrade the level of protection afforded to such areas is to reverse a long-established trend in planning towards the protection of locally-valued landscapes.
- 3.12. This proposal sets an altogether unwelcome precedent. To de-designate areas developed within AHLVs gives precisely the wrong message – that the valued landscape must inevitably be subsumed and ultimately lost. However, if development projects are carried out sensitively and with due regard to the quality of the landscape, then there is no reason why it should not continue to be locally-valued for its landscape characteristics.

Issue NE5: How should we make sure our approach to green gaps is still effective?

- 4.1. The issue of potential coalescence is proposed to be addressed through a “green gaps” policy.
- 4.2. The need to retain the gaps between settlements is an important policy tool to prevent settlements merging.
- 4.3. The Local Plan Evidence Base includes the Green Gaps and Local Green Space Review (April 2021). The review highlights the “*gradual erosion of the open countryside and coalesce between built up areas due to development.*” The Review states the loss of green gaps between settlements “*can not only harm the character of the open countryside, but can also adversely impact the setting and special character of villages.*”
- 4.4. There were 8 green gaps established in the current Local Plan. The preferred option is to retain the same 8 green gaps, with two minor adjustments.
- 4.5. However, the threat of coalescence has increased with the developments established in the current local plan. It follows that the candidates for green gap designation ought to have increased.
- 4.6. There is currently less than 3km between Chartham and Thanington. The new development committed at Cockering Farm will add a significant amount of built development at Thanington, thus reducing the existing gap between Chartham and Thanington, not to mention impact views towards the World Heritage Site.
- 4.7. This is of importance to the Parish, both in terms of protecting a sense of place and community, as well as for wider strategic landscape reasons.

- 4.8. The Green Gaps and Local Green Space Review (April 2021) notes that a green gap in this location has been under consideration. However, it notes that “parts of the area are already protected under other existing designations”.
- 4.9. The new Local Plan should recognise that coalescence can occur just as much through a series of decisions on small schemes as it can through strategic development such as at Cockering Farm. The fact that some parts of a gap may have other policy protections is not a credible reason in the Parish’s view for not designating as a green gap.
- 4.10. When reviewing existing and potential green gaps across the district, it is important to consider the Green Gaps and Local Green Space Review (April 2021) alongside the Landscape Character and Biodiversity Appraisal (October 2020).
- 4.11. The Stour Valley West landscape character area extends from the settlement edge of Canterbury City at Thanington to the district boundary in the west. The land between Chartham and Thanington is encompassed by this landscape character area, the northern boundary of which is defined by the A28.
- 4.12. The landscape is characterised by the flat alluvial floodplain. Some commercial uses have established along the A28. There are distinctive features such as the Paper Mill at Chartham (a key feature noted in the Chartham Conservation Area Appraisal). There are also the important intermittent views available along the valley floor of the City and the Cathedral, views that would have been available to pilgrims following the river towards their destination in the City.
- 4.13. The Landscape Character Appraisal also highlights the important role of the pasture and water bodies in lending a coherent rural character to the landscape.
- 4.14. These key features are at threat of being lost if development continues along the A28 and coalescence between Chartham and Thanington would further compromise this important landscape.
- 4.15. Alternatively, Canterbury City Council should consider identifying a series of “local gaps”, in circumstances where smaller settlements are at risk from potentially harmful coalescence. These gaps should be used where valued landscapes are potentially under threat and where existing distinct settlements may be overwhelmed by developments of disproportionate scale. If not considered suitable for green gap status, such a “local gap” should be identified between Chartham and Thanington, although there will no doubt be other strong candidates for similar policy protection.

Summary

- 5.1. Chartham Parish Council welcomes the opportunity to respond to the preferred options consultation.
- 5.2. The Parish Council's preferred option is Canterbury Focus A for the minimum 9,000 homes as it has concerns the higher number of housing will be unsustainable and transport improvements financially unviable.
- 5.3. The Parish Council considers that the settlement hierarchy, whilst performing a useful planning function, should be recast. The re-categorisation of a number of former Local Centres as Rural Service Centres is misleading. It implies that the sustainability of these has in some way improved, when the reverse is nearer the truth.
- 5.4. There is concern that the settlement hierarchy is used as a proxy for the suitability of settlements to accommodate more growth, yet the capacity for doing so is not part of the rationale for their identification.
- 5.5. The Parish is also concerned that St Augustine's appears to be regarded as part of the main settlement of Chartham. If anything it ought to be regarded as a settlement in its own right.
- 5.6. The focus on green infrastructure and targeting BNG improvements is welcomed. However, the importance of hedgerows in this regard have been overlooked.
- 5.7. The proposed deletion of the Canterbury AHLV as set out in Preferred Option NE40 is not supported. Alternative Option NE4N is preferred, although no change would be the Parish's preference.
- 5.8. The Parish considers that a green gap should be established between Thanington and Chartham. The green gaps do not appear to have been added to, despite more areas now being under threat. At the very least, a new category of "local gaps" should be introduced to reflect that additional pressure and the need for enhanced protections.