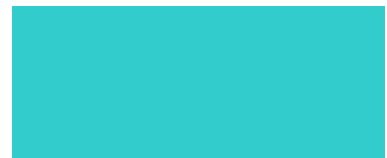
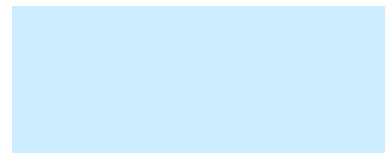


Canterbury District Local Plan

Publication Draft

SUMMARY OF MAIN ISSUES ARISING



November 2014

1. INTRODUCTION

- 1.1 The **Canterbury District Local Plan Publication Draft 2014** (referred to in this Report as the Publication Draft) was published by Canterbury City Council on **5th June 2014**. It sets out, in twelve chapters, 149 planning policies and 10 strategic site allocations to guide the development of Canterbury District over the next 17 years to 2031.
- 1.2 A period of six weeks was made available for comments. This Report provides a **summary of the Main Issues** arising from this consultation process, in compliance with Regulation 22 (c) (v) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 A total of **2,489 comments** in **440 representations** were received from **407** respondents. This represents a reduction in the level of response from that of the Preferred Option Consultation Draft when 6,996 comments were received. The Publication Draft incorporates a number of changes arising from these previous representations, including the removal of a safeguarded Park and Ride site at Harbledown, the retention of the existing level crossing at Sturry for local traffic and buses and the designation of Chaucer Fields and part of Kingsmead Field as Protected Open Space, each of which had received significant levels of comment. In addition, as part of the Preferred Options stage the Council had received a number of new proposals for site allocations, three of which, the Kent and Canterbury Hospital, land south of the Joseph Wilson Business Park, Whitstable and land at Sturry Road, Canterbury, have been incorporated in the Publication Draft.
- 1.4 Comments were received in a variety of formats. Respondents were encouraged to submit comments online at the Council's consultation portal. However, only 12.5% of representations were made in this way. Instead, comments were predominantly received by email and letter. In the case of those representations not submitted online, the content of each was subsequently uploaded onto the online database by Council Officers to produce a complete, and publically accessible online database. Where specific paragraphs or policies were not included in the comment, efforts were made to attach that comment to the most appropriate policy or paragraph.

1.5 Of the comments received, **30%** are in response to the **Strategy Chapter** (including the **Strategic Site Allocations**) while **20%** concern **transport** issues as set out in the policies and paragraphs of Chapter Five of the Publication Draft.

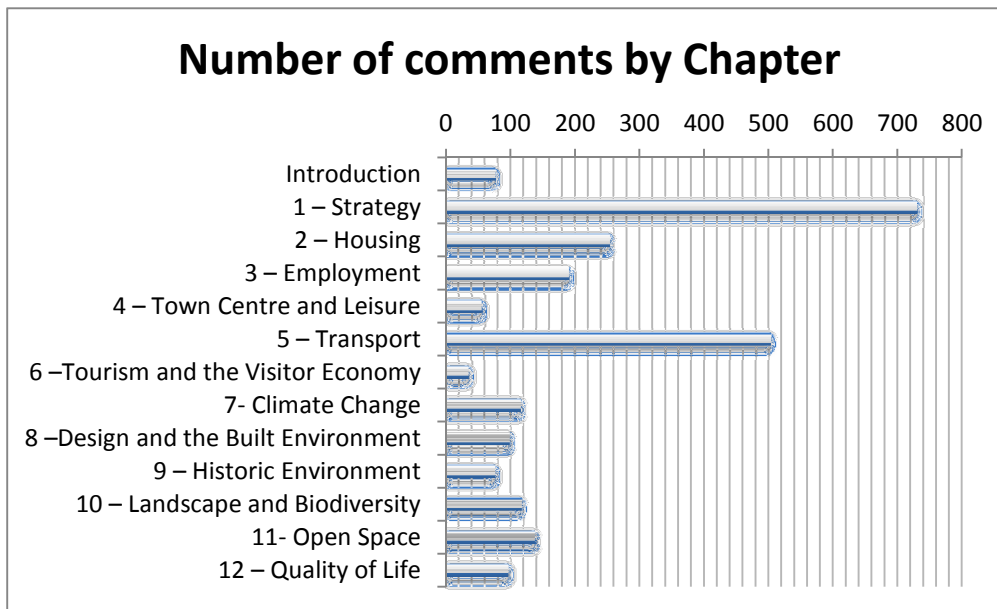


Figure 1: Total number of comments by Chapter

1.6 As is to be expected at this stage in the preparation of the Local Plan, the majority of comments are seeking changes to the Plan prior to its adoption. However, a number of policies received no comments or objections, namely

Chapter 2: HD4, HD7, HD8 and HD9

Chapter 3: EMP5, EMP6 and EMP10

Chapter 4: TCL4

Chapter 5: T9

Chapter 6: TV2, TV6 and TV7

Chapter 8: DBE13

Chapter 9: HE3, HE7 and HE13

Chapter 10: LB8, LB10, LB11, LB12 and LB13

Chapter 11: OS3, OS4, OS12, OS13 and OS14

Chapter 12: QL1, QL2 and QL7

2. SUMMARY OF MAIN ISSUES

- 2.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 require Local Planning Authorities to prepare “**a summary of the main issues raised by the representations**”. Although a Main Issue is not defined in legislation or guidance it is generally accepted to mean an issue that goes to the heart of the soundness of the Plan.
- 2.2 Guidance from the Planning Inspectorate¹ confirms this, defining ‘issues’ in this context as “*the key points on which decisions about the soundness of the document will depend*”² and ‘main issues’ as “*issues upon which the soundness of the plan depends*”³.
- 2.3 The Main Issues to arise from representations across all Chapters of the Publication Draft can be broadly grouped under the following headings:
- **Housing Numbers**
 - **Infrastructure and Deliverability**
 - **Duty to Co-operate**
 - **Environmental Issues**

¹ *Examining Local Plans Procedural Practice*, The Planning Inspectorate, December 2013

² *Examining Local Plans Procedural Practice*, The Planning Inspectorate, December 2013, paragraph 2.5

³ *Examining Local Plans Procedural Practice*, The Planning Inspectorate, December 2013, paragraph 5.4

- 2.4 The soundness of the **evidence base** for an objectively assessed housing need for Canterbury District and the resultant proposed scale of new development are the subject of significant comment. Such soundness concerns include, in particular
- the use of the Canterbury Development Requirements Study of 2012⁴ as an evidence base for housing numbers;
 - the conclusions of that Study and the justification for the selection of Development Scenario E;
 - the relationship between the Canterbury Development Requirements Study and the Canterbury Futures Study⁵ (2006, updated 2011);
 - the reliance of the Housing Strategy on the East Kent SHMA which dates from 2009, and whether the housing targets meet the housing needs for the District as identified in the SHMA;
 - and the failure of the Publication Draft to take account of the revised ONS projections of May 2014.
- 2.5 Consultees also raise concerns about the response of the Publication Draft to the potential implications of the **unmet housing needs** at the neighbouring authority of Swale. The House Builders Federation amongst others makes reference to the apparent non-regard in the Publication Draft for the **London overspill housing** issue. The soundness of the Publication Draft given the lack of a Gypsy and Travellers Accommodation Assessment, together with the failure of the Plan to identify sites or broad locations for **Gypsy and Traveller sites**, is also raised.
- 2.6 The soundness of the proposed strategic allocation at **South Canterbury**, in particular, the proposed scale of development, the loss of Grade 1 agricultural land, the relationship with the proposed new A2 interchange and the location of this allocation on the opposite side of the City to its high speed rail station, are frequently cited areas of concern. The proposed

⁴ *Canterbury Development Requirements Study*, commissioned by Canterbury City Council from Nathaniel Lichfield & Partners (also referred to in representations as the NLP Study), (2012)

⁵ *Canterbury Futures Study: at a Crossroad*, commissioned by Canterbury City Council from Experian Business Strategies, the Future Foundation and GVA Grimley, (2006, updated 2011)

allocations at **Strode Farm**, and **Sturry /Broad Oak** also give rise to significant levels of representations, principally centred on the traffic implications of allocations of this scale in these locations.

- 2.7 The approach to the **strategic location** of new development across the District is considered unsound by a number of consultees and there is frequently voiced concern about the impact of strategic allocations and infrastructure on the **villages of Herne, Broad Oak and Bridge**.
- 2.8 There is one new major proposal for an urban extension at Stuppington, and multiple instances of support for an alternative strategic allocation at Thanington.

RELEVANT KEY POLICIES/PARAGRAPHS	SP2, SP3, SP4, paragraph 2.24, HD1, HD10
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INFRASTRUCTURE AND DELIVERABILITY

- 2.9 With regard to the delivery of the selected levels of development, concern is expressed widely in the representations received at the dependence of the proposed strategic allocations on the **delivery of significant strategic infrastructure**, in particular new highway infrastructure, including the proposed new A2 interchange near Bridge and a relief road at Sturry. As a result the soundness and the NPPF compliance of the Publication Draft is questioned.
- 2.10 With regard to new highway infrastructure, concern is raised at the resultant **viability** of the allocations, and that the deliverability of affordable housing and other community facilities and landscaping could be compromised by the high infrastructure costs associated with all of the strategic housing allocations, and in the case of the strategic sites in Herne Bay, the locking of these together to deliver the necessary highway upgrading. Many responses highlight that the existing local infrastructure in the District, particularly health and education provision, is significantly overloaded at present .
- 2.11 Southern Water make representations on the proposed wording of all the strategic site allocations in relation to the capacity of the local sewerage network, while the National Grid raises concern that the Sturry/Broad Oak allocation and the new Sturry relief road have the potential to interact with the proposed route of the new Richborough Connection Project High Voltage electricity line.
- 2.12 The **lack of an Infrastructure Delivery Plan** at this stage in the preparation of the Local Plan, and the perceived consequent impact on the deliverability of strategic sites, is a main issue in many representations, including that made by Dover District Council. Furthermore, the soundness of the Publication Draft is questioned given that it has proceeded in advance of core elements of the evidence base, including the transport strategy (including VISUM modelling results), the open space strategy and the economic strategy. This is viewed by many as undermining the Publication Draft as well as making it difficult for consultees to adequately examine the background for the policies and allocations proposed.

RELEVANT KEY POLICIES/PARAGRAPHS	SP3 (1 and 2), paragraph 1.79, SP6
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DUTY TO CO-OPERATE

- 2.13 The compliance of the Publication Draft with the duty on the Planning Authority to co-operate with adjacent areas is questioned across many representations received. In particular, the lack of evidence demonstrating that the Publication Draft is based on **constructive, active and ongoing strategic discussions with adjacent areas** is a main issue for a number of consultees, including Dover District Council.
- 2.14 In this regard, Swale Borough Council raises its earlier request that the City Council consider providing a proportion of Swale’s unmet housing need. That the Transport Strategy had not been agreed by Kent County Council is also raised in representations as evidence of non-cooperation at county level, although not by the County Council itself. In addition, the House Builders Federation and others assert that, in addition to deficiencies in analysing cross boundary pressures, the Publication Draft has not had regard to the London housing overspill issue.
- 2.15 The Campaign for the Protection of Rural England (Kent) and a number of rural parishes raise concern over the extent of consultation with rural communities, including on assessments of housing need, while the representation of the Ipsos MORI public opinion research results and the level of consultation with parish councils and other key local stakeholders is questioned.

RELEVANT KEY POLICIES/PARAGRAPHS	Paragraphs xvi, 1.18 – 1.28
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- 2.16 The **impact on European and protected sites** in the District of the overall scale of development proposed is raised as a subject of concern. In particular, Natural England consider that there is a lack of policy detail on **protection of internationally designated sites** and **mitigation**. It seeks further information on the Habitat Regulations Assessment, which it is concerned does not assess adequately the potential impacts that may arise from the development proposed in the Publication Draft, in order to be satisfied that there is no likely significant effect on internationally designated sites and therefore that the Plan is sound. It advises that air and water quality impacts need further consideration for all sites and it is not appropriate for these to be assessed at project level via Policy SP7.
- 2.17 Concern is expressed over the potential recreational pressure on the Thanet Coast and Sandwich Bay SPA/Ramsar site, the Blean Complex SAC and the SSSIs of the District including West Blean and Thornden Woods SSSI and Local Wildlife Sites including Duncan Downs from the strategic sites allocations, both individually and collectively.
- 2.18 The loss of Grade 1 and 2/3 agricultural land resulting from the proposed strategic site allocations, in particular at South Canterbury and Strode Farm, was also a main issue emerging from the consultation.

RELEVANT KEY POLICIES/PARAGRAPHS	SP3 (1,5), SP7, paragraph 10.33, LB5
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Other key issues

2.19 An overview of the distribution of comments reveals the impact of three campaigns involving multiple, often identical, submissions. These concern

- the proposed extension of the **Joseph Wilson Business Park, Whitstable**
- the proposed development of the **Canterbury West Station Car Park**
- the reliance on the future development of the Wincheap Industrial Estate to deliver the fourth **A2 slip road at Wincheap**.

These issues influence the numerical profile of comments received. The Policy to receive the highest number of comments was EMP1 (which, inter alia, allocates land at the Joseph Wilson Business Park and Canterbury West for employment uses), with Policies T11 and HD1 and paragraphs 5.38, 5.41 and 5.49, cited in the representations on Canterbury West Car Park and the Wincheap slip road, also figuring strongly.

POLICY / PARAGRAPH	SUBJECT	NUMBER OF COMMENTS
EMP1	Employment land allocations	109
SP3 (1)	South Canterbury Site Allocation	90
T11	Wincheap Traffic Management Scheme	71
HD1	Housing allocations	62
5.38	Park and ride (supporting text)	61
5.41	Wincheap park and ride (supporting text)	58
5.49	Wincheap traffic infrastructure (supporting text)	56
SP2	Development Requirements	51
SP3 (5)	Strode Farm Site Allocation	36
SP4	Strategic approach to location of development	32
SP3 (2)	Sturry/Broad Oak Site Allocation	30
T4	Rail improvement measures	28
2.24	Strategic Site allocations (supporting text)	28
OS6	Green Gaps	26

Figure 2: Areas of the Publication Draft receiving the greatest number of comments.