



Canterbury District Local Plan Preferred Option Draft Consultation 2013

Event Name	Canterbury District Local Plan Preferred Option Draft Consultation 2013
Comment by	Cantley Limited
Comment ID	PO5123
Response Date	29/08/13 09:18
Consultation Point	Policy HD1 (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	734 Stuart Garnett for Cantley Ltd 3.pdf

Question 1

Are you supporting or objecting to this Policy, Paragraph or Appendix? Objecting

Question 2: Detailed comments

Please state fully and clearly the reasons for your support or objection to this Policy, Paragraph or Appendix.

The Rural Settlement Hierarchy Study (RSHC) of Canterbury District (October 2011) sought to identify the hierarchy of settlements in the District. Cantley Limited supports the principle of establishing a settlement hierarchy to focus development sequentially upon the principal urban areas first. However, it is essential for policy to support and maintain rural communities and their services by providing adequate levels of development over the plan period, as acknowledged in the National Planning Policy Framework (NPPF) paragraph 55, which states housing should be located where it will enhance or maintain the vitality of rural communities. Bridge is served by a good range of services, facilities and public transport and it is vital that appropriate levels of new development (housing, employment, community facilities, etc) are provided to meet local needs and sustain the community over the 20 year plan period.

At paragraphs 5.2 and 5.3 of the RSHC, it states the City Council remains committed to a hierarchy of rural settlements and which updated the hierarchy in the Core Strategy Options Report (January 2010). Paragraph 5.4 identifies Sturry as having a wider service centre role than Barham, Blean, Bridge, Chartham, Hersden and Littlebourne and therefore, may be appropriate for additional housing in excess of 'minor development'. It is not clear why the smaller villages, such as Bridge, are only deemed suitable for 'minor development' as no evidence base is presented to support this contention. Their position is supplemented in the Study at paragraph 5.5, which states *"these villages are thus rural settlements where small scale additional housing development may be appropriate commensurate with their size and village character and subject to environmental and other factors"*.

Bridge is designated in the Canterbury District Local Plan (CDLP) Preferred Option Draft Consultation in the table below paragraph 1.71 as a 'Local Centre' alongside five other small settlements but below Sturry, which is designated as a 'Rural Service Centre'.

The Canterbury District Local Plan (CDLP) Policies SP3a to SP3i identify strategic allocations for 9,000 dwellings with a further 916 dwellings to be allocated on other sites (CDLP paragraph 2.24). A strategic allocation is proposed in the Rural Service Centre of Sturry and also the Local Centre of Hersden, as well as a further allocation at Hersden and another at Barham (also a Local Centre). There are no further proposed allocations in the other Rural Settlements, including Bridge.

Whilst Bridge is one of the smaller Local Centres in comparison to Hersden, Chartham and Blean, it is larger than Barham which is proposed to have an allocation of 25 dwellings (CDLP table below paragraph 2.24). Furthermore, the RSHC identifies Bridge as having a Rural Settlement Ranking of 27 to Barham's 21 (Table 3, page 29) and a slightly larger population (see page 6).

Through discussions with Bridge Parish Council (BPC) we are aware of the emergence of their Neighbourhood Plan, and at the early stages they identified the potential to allocate up to 18 dwellings in the village, of which a maximum of 10 dwellings could be accommodated on land owned by Cantley Limited (part of the land identified in the SHLAA, reference SHLAA/201). Subsequent discussions have been held by Savills on behalf of Cantley Limited's with CCC and the Parish Council (most recently on the 18 and 19 March 2013) and an illustrative layout (enclosed) has been produced and circulated for discussion. The drafting of Policy SP4(2) as currently worded would conflict with the provision of 10 dwellings through the Bridge Neighbourhood Plan.

Cantley Limited is concerned with the 'Canterbury City Council Sustainability Appraisal of SHLAA Sites Rural (south) Worksheets' which has scored the potential for development on the entire SHLAA/201 site. It has become clear through the discussions with the Parish Council that only a small area of this site to accommodate 10 dwellings would have local support, and CCC is aware of these discussions – the plans from the Parish Council and Savills have been issued to CCC Policy team. The following areas in the Sustainability Appraisal should therefore, be revised, and in doing so would significantly reduce potential adverse sustainability impacts:

- 1 Water Quality (3.1) – scores a 'Significant Negative Impact' as it assumes development would be within 10m of a surface water body. The draft layout currently produced for development shows development would be approximately 25m from the stream (exact distance can be firmed up once detailed plans are produced). As such its score should be revised to 'No Impact'.
- 2 Countryside and Historic Environment (5.6) – clarification is required why 'Significant Negative Impact' is attributed to the site as there are no historic features on the site. Score should be revised to 'Uncertain'.
- 3 Ecology and Biodiversity (6.1 & 6.2) – clarification is required why the score is 'Minor Negative' when under the discussion and assumptions it merely states 'there is a possibility of protected species on the periphery of the site. There are also groups and lines of trees within the site'. The proposed development siting would not affect the periphery of the site or existing trees. Scores should be revised to 'No Impact'.
- 4 Climate change (7.1) & Flood Risk (8.1) – the proposed siting of the development would be outside of Flood Zone 3. Scores should be revised to 'No Impact'.

Having regard to the above, and based on a development of only approximately 10 dwellings on land towards Patribourne Road but away from the stream, overall, the Sustainability Impacts would be positive. As such the SHLAA Summary of Methodology and Assessment of Sites (June 2013) could revise its decision for the smaller area of land on SHLAA/201 to include it as a potential site for development and the site should be considered as a potential site allocation. It is noted that the SHLAA (June 2013) excludes all 3 potential residential sites in Bridge.

Summary of comment

Please provide a summary of your comment that is no more than 500 characters long (approximately 100 words). We need to provide this in our final reports.

Raise concerns about the scoring of the Sustainability Appraisal (SA) for SHLAA/201. The following areas of the SA should be revised based on the developable area rather than the entire site, and in doing so this would significantly reduce the perceived adverse sustainability impact: Water Quality,

Countryside and Historic Environment, Ecology and Biodiversity and Climate Change. As such, the decision not to include the site as potential site for development should be revised.

Question 3: Changes sought

If objecting, please state what change you are seeking, which could resolve your objection.

Land at Bridge (SHLAA/201) should be identified in the CDLP table below paragraph 2.24 for an allocation of 10 dwellings.