

CHAPTER TWO

2. OBJECTIONS TO THE CHAPTER ON THE KEY VISION AND STRATEGIC DEVELOPMENT OBJECTIVES

OUR DEVELOPMENT OBJECTIVES

Objections and Key Issues

RN322 English Heritage (1773)

RN139 Pelham Homes Ltd Represented by Jennifer Owen Associates (1569)

RN306 Parish Council of Bekesbourne with Patrixbourne (2320)

RN120 English Nature (464)

RN208 Thanet District Council (760)

- The addition of the Strategic Development Objectives to the decision-making process is of questionable merit and may confuse the plan
- Concern because Plan indicates that its strategic development objectives will carry more weight than other Local Plan policies
- Delete Paragraph 1.4; not clear that the objectives are actual policies, as they are not named as such
- Strategic development objectives should not take precedence over other policy objectives.
- English Nature objects to a number of the strategic objectives taking precedence over other policies in their current form.

Re: A1/002

RD020 Mrs A Wilks (20039)

RD090 Parish Council of Bekesbourne with Patrixbourne (20209)

- Delete "Strategic development.... to Local Plan"; nothing must take precedence over environmental or open space Policy
- Not agreed that strategic development objectives should take precedence over other objectives of Plan

Reasoning and Conclusions

2.1 In paragraphs 2.1 to 2.5 the principle of Strategic Development Objectives is set out. I believe that this is a useful device in an age of detailed development plans; development control decisions often cite a number of plan policies that can be quoted and compared by disappointed developers to show how they contain elements of mutual contradiction. A demonstration of the Council's over-arching concept and its priorities is a vital counter-weight in these circumstances, and there is no proscription I am aware of against the use of such a device.

2.2 Nevertheless, the wording used needs to be considered very carefully, not least because it will be frequently quoted back at the Council in the control of development by applicants, appellants and their advocates. I consider that the removal of the words "take precedence over" from paragraph 1.4 would be worthwhile, as it could not then be plausibly argued that there is some hidden agenda favouring development over non-development. This could be achieved if the second sentence of paragraph 1.4 were re-drafted to read: "The Strategic Development Objectives briefly set out fundamental development principles for the implementation of the vision and key objectives. Consequently, the particular objectives of all other policies in the Local Plan are to be interpreted as having been formulated not to contradict or undermine the Strategic Development Objectives." That redrafting should remove any plausible argument that the existence of the Objectives fetters the discretion of

the Council to give appropriate weight to any policy in its consideration of a particular planning proposal.

- 2.3 The text of paragraph 1.7 will need amendment, in view of the inadequacies I have found in the allocated sites to meet the strategic housing requirement. Likewise the Strategic Development Initiative (a) might start: “..To maximise the delivery of sustainable housing development ...”, because this would retain the purpose of the objective, if anything strengthening it, but also implicitly acknowledge that other sites must be brought into play.

Recommendation

- 2.4 I recommend that the Local Plan be modified to incorporate altered wording as suggested in my paragraphs 2.2-2.3 above, but that no other modification be made to the text of the Revised Deposit Draft of the Local Plan in respect of this objection.

HOUSING

Objections and Key Issues

RN198 MHP Partnership represented by Davies Arnold Cooper (253, 254)

- In 1.6 insert "and the Regeneration Zones/Study Areas" after "urban areas"
- In 1.7 insert " and Regeneration Zones/Study Areas" after "urban areas"; and at the end of the sentence, refer to safeguarding employment/community/environmental benefits and uses

Reasoning and Conclusions

- 2.5 These objections are made with the aim of furthering major development at Hersden, but the Plan text, on which I have already commented on above, is not related to the objector's concerns and does not need to be.

Recommendation

- 2.6 I recommend that no modification be made to the Revised Deposit Draft Local Plan in respect of these objections.

ECONOMIC GROWTH

Objections and Key Issues

RN320 JTS Partnership (1996)

RN104 Relf (916)

RN115 Gardner & Croft (906)

RN124 Lee Evans de Moubray (902)

RN260 Peter Jackson Architects (2181)

RN207 Reeves and Neylan (745)

RN198 MHP Partnership represented by Davies Arnold Cooper (256, 257)

- Unclear definition in paras. 1.9 to 1.11
- In 1.9 Amend text to be more precise and clear re reducing economic disparities in the District and East Kent

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- Low average wage levels and high house prices could be targeted but are ignored. The statement 'the plan proposes to address this' is meaningless. Recognition is required that quality and quantity of housing is essential
- After "colleges" insert reference to housing demand from the growing City student population of the City, also requiring additional housing over and above any new proposals for new campuses
- Add, "and make provision for the accommodation of the growing student population
- Should address need for science and business park with an allocation

ReA1/003

RD137

MHP Partnership represented by Davies Arnold Cooper (20591)

- Para 1.8 after New Thanet Way add "and the A28 corridor"

Reasoning and Conclusions

2.7 The Council has put forward Proposed Change PC1/001, to add mention of the A28 corridor to the last sentence of amended paragraph 1.8. The other objections are generally seeking expansion of the text to address or expand on particular matters covered elsewhere in specific Plan chapters. That is neither necessary nor desirable in a short crisp chapter like this.

Recommendation

2.8 I recommend that the Local Plan be modified to incorporate Proposed Change No. PC1/001, as set out in Core Documents CD1.14, CD1.19 and CD1.21, but that no other modification be made to the text of the Revised Deposit Draft of the Local Plan in respect of these objections.

RURAL AREAS

Objections and Key Issues

RN311 Bridge Parish Council (2288)

RN270 The Church Commissioners for England represented by Cluttons (1965)

RN198 MHP Partnership represented by Davies Arnold Cooper (258)

RN260 Peter Jackson Architects (2183)

- Village and rural area sustainability has suffered due to policies stopping organic growth. The key objective is meaningless as almost all policies prevent vitality, viability and sustainability.
- Unclear what paragraph means. Further information should be included.
- If objectives for rural areas are to be fulfilled, the strategy needs to provide greater flexibility for residential development in villages. Needed for enhancing vitality and viability

Reasoning and Conclusions

2.9 Having read this paragraph through several times I am still not really sure whether it says anything of real significance. A short definition of "Rural Areas" would help me, at least. If it means everywhere outside the three Urban Area Boundaries, perhaps that could be said. A mention of the need and aim to protect the open countryside for its own sake would be appropriate, lest "thriving" is interpreted as some sort of excuse for avoidable incursions on to undeveloped land.

Recommendation

2.10 I recommend that the Local Plan be modified to incorporate altered wording as suggested in my paragraph 2.9 above, but that no other modification be made to the text of the Revised Deposit Draft of the Local Plan in respect of this objection.

CULTURAL DEVELOPMENT

Objections and Key Issues

RN229 Property Review & Development (2608)

- In 1.13, a failure to address adequately the provision of Community and Cultural Services. Development contributions should be sought for these in the town centres

Reasoning and Conclusions

2.11 The Council points out that the matter objected to is addressed in Local Plan Chapter 4. I find there is no need to go into detail here.

Recommendation

2.12 I recommend that no modification be made to the text of the Revised Deposit Draft of the Local Plan in respect of this objection.

REGENERATION ZONES

Objections and Key Issues

RN198 MHP Partnership represented by Davies Arnold Cooper (259)

RN348 Littlebourne Parish Council (2496)

RN328 Westbere Parish Council (2410)

RN139 Pelham Homes Ltd Represented by Jennifer Owen Associates (1567)

RN198 MHP Partnership represented by Davies Arnold Cooper (260, 261)

- Add support for new development which adds to the vitality and viability of the Regeneration Zones/ Study Areas
- Any development at Lakeview should only be granted to give employment opportunities to the Hersden community. The development should be high quality
- The regeneration zone notation should apply to the former colliery land at Hersden
- This statement is acceptable if Hersden is planned so that people live and work there and do not need to travel, as the A28 is already congested
- There is a failure to recognise Hersden's isolation in terms of public transport links and access to services. It should also pass the PPG3 sequential test for future development.
- Add to the text by identifying the Former Colliery Land at Hersden as a location for mixed use development
- Add, "In addition the Council will actively support proposals for the reopening of the former railway station at Hersden."

Re A1/004

RD077 Hillreed Developments Limited (20155)

RD137 MHP Partnership represented by Davies Arnold Cooper (20592)

- Object to the deletion of paras. on Hersden. Extensive formal & informal public consultation has identified need for additional housing, social & environmental improvements at Hersden. Reinstate and include additional text

Reasoning and Conclusions

2.13 Between the Deposit and the Revised Deposit Draft versions of the Local Plan, the Council thought better of its earlier decision to create a "Regeneration Zone Area of Study" on a large area of land around Hersden Village, enclosed by a boundary line on the Proposals Map. In the Revised Deposit Draft, the Proposals Map shows no demarcated Zone around Hersden Village, and the Plan text is altered radically about future action at Hersden, envisaging a "Community Plan", and deleting previous reference to a Development Brief. The Community Plan process would produce a non-statutory document that would not usurp the functions of a future Local Development Framework about planning decisions. It is seen more as a vehicle for identifying new regeneration needs, to be produced by or before mid-2007.

2.14 I have considered the whole matter of Hersden in my Chapter Three, at paragraphs 3.3.104-3.3.137. I explain there my reasons for agreeing with the Council's change of heart. Consequently, there is no need for a special mention of Hersden in the present Plan Chapter.

Recommendation

2.15 I recommend that no modification be made to the Revised Deposit Draft Local Plan in respect of these objections.

PARAGRAPH 1.24 – THE STRATEGIC DEVELOPMENT OBJECTIVES

Objections and Key Issues

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|-------|--|
| RN156 | BSF Planning Consultants (1882, 1889, 1890, 1891) |
| RN198 | MHP Partnership represented by Davies Arnold Cooper (262, 265, 266, 267, 268, 269) |
| RN322 | English Heritage (1774) |
| RN139 | Pelham Homes Ltd Represented by Jennifer Owen Associates (1566) |
| RN260 | Peter Jackson Architects (2186, 2187, 2188, 2189) |
| RN229 | Property Review & Development (2601) |
| RN284 | RSPB (981) |
| RN086 | Thomas (443) |
| RN120 | English Nature (465, 466, 467) |
| RN209 | PACE (774,775) |
| RN061 | PACE (30) |
| RN212 | Canterbury Christ Church University College (804) |
- Re 1.23, the Council's Strategic Development Objectives will carry more weight than other policies in the Plan - allows Council to always argue economic development comes first
 - Paragraphs seem unlikely to provide outcomes which release new land or produce significant growth opportunity for the core business of Canterbury Christ Church University College
 - Insert into objective (a) "and Regeneration Zones/Study Areas" after "urban areas"
 - Re (a) - This is a short term and entirely unsustainable objective with no proper analysis and scant justification
 - Re (a) - English Nature objects because brown field land can have a higher nature conservation value than many green field sites
 - Re (b) -There is no mention of sustainability in this objective

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- Re (b) - conflict of policy. The effect of employment land on the environment is more negative than the effect of well designed housing. Quality housing is needed to go with employment land
- Re (c) - add "particularly on brown-field land within the Regeneration Zones/Study Areas."
- Re (d) - add "particularly on brown-field land within the Regeneration Zones/Study Areas."
- Re (e) - Sustainable rural economies need some organic growth, which the plan wholly prevents
- Re (g)- insert "including new housing on brownfield land" after "encourage investment"
- Re (h) - English Nature objects to the wording of this objective as it would seem to override the Habitats Regulations
- Add new (j) to give priority to development projects in areas of deprivation within the East Kent Coalfield area including the Former Colliery Land at Hersden
- Add new paragraph, to select new housing from derelict sites, including the former colliery site at Hersden and not those in existing employment use
- Add new paragraph. In selecting new sites for housing avoid land currently or recently in employment use, avoid land at risk of flooding and in recreational use
- Policies and proposals of plan fail to meet strategic development objectives, with particular reference to: insufficient opportunities for business growth or land for business innovation
- There should be a sustainable rural policy and explanation of how sustainable development will be achieved. It should also clarify how community infrastructure will be met through housing development
- Protection and maintenance of heritage and distinctiveness are worthy of investment support
- Policies and proposals of plan fail to meet strategic development objectives, with particular reference to: insufficient employment land, important employment sites allocated to inappropriate uses
- Policies and proposals of plan fail to examine the needs of rural communities for housing and employment
- Object to statement that the listed strategic development objectives will carry more weight than other policies - as this would endanger Canterbury's environment
- Objectives in paragraph 1.24 won't bring about aims in paragraph 1.23: too biased to promoting business – (b) doesn't say will safeguard environment, (c) sets out no geographical limit, (d) only looks at business, (e,f,g,h) all promote business development
- The Strategic Development Objectives are so broad based that they are capable of overriding every policy in the Local Plan. It is not clear that the objectives are actual policies
- Objectives should be more holistic, with a focus on conserving the natural environment
- The well being of people, environment and local economy should be paramount strategic objectives. The policies as presently drafted would be counter productive in all these areas
- Achieving a better spatial balance of retail provision between Canterbury, Whitstable and Herne Bay would be beneficial and should be a strategic objective
- Additional objective required: A strong policy on the quality of materials and design is essential, particularly if village repair by controlled growth is considered

Re A1/005

RD077	Hillreed Developments Limited (20164)
RD097	English Nature (20257)
RD135	KCC Education and Libraries (20547)
RD020	Mrs A Wilks (20041)

- Object to deletion of Hersden Regeneration Zone in para 1.24 criterion g) – reinstate
- Objects to part a) and part h). Suggests additional text for each criterion
- Maintain objection as amendments does not address KCC's concerns. How will sustainable development pattern be achieved within urban areas & accommodate new community facilities
- Delete "and the wider East Kent Area"

Reasoning and Conclusions

2.16 The Council has put forward Proposed Change PC1/002 to refine and strengthen part (a), to reinstate part (b), and to add to part (h) mention of protecting wildlife in adjacent internationally important sites.

2.17 I have given careful consideration to all these representations, but other than the specific textual amendments made by the Council in the Revised Deposit Draft and the Proposed Change, nothing suggests to me an obvious need for further text or changes. Often the points made are covered more appropriately and in greater detail in a particular subject chapter or, if not, are simply not what the Council itself wants to stress. I consider that

some very brief mention of the need and aim to protect the open countryside for its own sake, while pursuing this aim, would be appropriate within the text of Objective (e). Otherwise I find that the Objectives achieve pithy expression without losing meaning or effect.

Recommendation

2.18 I recommend that the Local Plan be modified to incorporate Proposed Change No. PC1/002, as set out in Core Documents CD1.14, CD1.19 and CD1.21, and the altered wording I suggest in my paragraph 2.17 above, but that no other modification be made to the text of the Revised Deposit Draft of the Local Plan in respect of these objections.
