

CHAPTER FOUR

4. OBJECTIONS TO THE CHAPTER ON BOOSTING OUR LOCAL ECONOMY

POLICY ED1 - SAFEGUARDING EXISTING EMPLOYMENT SITES AND CLUSTERS - AND PREAMBLE IN PARAGRAPHS 3.1- 3.25

Objections and Key Issues

Re: A3/001 – Our Objectives

RD103 Canterbury District Chamber of Commerce (20275)

RD133 Reeves & Neylan (20492)

RD137 MHP Partnership represented by Davies Arnold Cooper (20620)

- Reinstatement objective to increase average earnings: a retreat from concept of closing earnings gap between Canterbury and rest of Kent. Reduces need to attract private sector high skilled employment & commitment to knowledge based economy
- Add to last bullet point and seek to ensure a sustainable balance of homes & jobs, particularly where major employment clusters & proposals such as Lakesview business park are being promoted

Paragraph 3.1

RN348 Littlebourne Parish Council (2507)

- There should be a policy to safeguard Hospital in view of the size of population

Paragraph 3.6

RN207 Reeves and Neylan (748)

Re: A3/007 – Amended paragraph 3.6

- says 36% of workforce are knowledge workers and 3.7 states knowledge employment is concentrated in public sector organisations - this definition of knowledge workers falls outside DTI knowledge economic definition

RD137 MHP Partnership represented by Davies Arnold Cooper (20621)

- The District's manufacturing base should be protected & encouraged

Re: A3/008 – Amended paragraph 3.7

RD103 Canterbury District Chamber of Commerce (20276)

RD137 MHP Partnership represented by Davies Arnold Cooper (20622)

- Amendment deletes fact that local businesses need Improved Commercial Accommodation. Growth of local finance & hi tech sectors impeded by lack of modern accommodation. In 2002 Cluttons had enquiries for 100,000 sq ft of modern office accommodation
- The District's manufacturing base should be protected & encouraged

Paragraph 3.11

RN208 Thanet District Council (759)

- Makes no reference to Thanet business parks – Area Investment Framework notes that are too many sites & too few developers. Therefore no new sites should be promoted or carried forward

Paragraph 3.13

RN038 Girlings Solicitors (1849)

- The business community has been neglected in planning terms in respect of office development and new modern commercial development

Re: A3/010

RD103 Canterbury District Chamber of Commerce (20277)

RD133 Reeves & Neylan (20494)

- Need for legal agreements will impose burden on new business development, putting them at a competitive disadvantage compared to those in surrounding districts

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

Paragraph 3.14

RN038 Girlings Solicitors (1846)

RN207 Reeves and Neylan (744)

- Re part 2 - inadequate provision for knowledge based businesses & professional services & not enough employment or mixed-use allocations, which are needed to boost the economy
- Concerned there is no provision for new commercial business use and no provision for a Science, Technology or Business Park. There is a shortage of office space that is close to the City

Re: A3/011 – Amended paragraph 3.14

RD077 Hillreed Homes Ltd (20162)

- Hersden Regeneration Zone should be reinstated

Re: A3/013 – New paragraph 3.14b

RD004 Blean Parish Council (20212)

RD103 Canterbury District Chamber of Commerce (20278)

RD133 Reeves & Neylan (20495)

RD137 MHP Partnership represented by Davies Arnold Cooper (20623)

- Allocation of sites on proposals map still inadequate to meet needs of local economy and CCC's strategy
- Refer to housing & employment development in PAERs. Concept of homes & jobs in close proximity is fundamental to concept of sustainable development. Discourage loss of employment sites to housing
- Supports creation of Business Innovation Centre, provided no increase in traffic volumes through Blean
- Allocation of sites on Proposals Map inadequate to meet needs of local economy

Paragraph 3.24

RN285 Strategic Rail Authority (827)

- In view of improvement of rail freight, refer to development for employment uses of sites next to railway: good connection to rail network

Re: A3/017 – Amended paragraph 3.24

RD137 MHP Partnership represented by Davies Arnold Cooper (20624)

- Amend to read “employment land and mixed use allocations”

Re: PC3/004; new para 3.24a

APC044 Strutt & Parker (30050)

APC098 Amirage Properties (30126)

- Development excessive for a location of this nature, no prospect of a single occupier emerging from this complex
- Unsustainable, no study of employment rated demand in this area, businesses would not be attracted to this area.

Re: A3/018 – Amended paragraph 3.25

RD118 Kitewood Estates (20476)

RD126 Pelham Homes Ltd represented by Jennifer Owen & Associates (20370)

RD137 MHP Partnership represented by Davies Arnold Cooper (20625)

- Objects to deletion of Blacksole Farm as an employment cluster
- Protect all existing employment areas within non-car based access of existing and proposed residential areas, to ensure that jobs in sustainable locations are not lost. Extend list to include these sites.
- Protection of existing and recently used employment sites should be of wider application and not just 9 identified sites

Re: PC3/005; amended para 3.25(A3/018)

APC044 Strutt & Parker (30051)

APC098 Amirage Properties (30127)

- Do not consider that there is a likely market demand to meet this floorspace provision in this allocation
- Unsustainable, no study of employment rated demand in this area, businesses would not be attracted to this area

Re: PC3/006; amendment to Proposals Map re Breach Farm

APC124 Highways Agency (30159)

APC098 Amirage Properties (30128)

- Support is subject to concerns regarding the transport impacts on A2

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

- Unsustainable, no study of employment rated demand in this area, businesses would not be attracted to this area

Policy ED1

RN034 National Grid represented by Malcolm Judd & Partners (1605)

RN098 Ms P Gibb represented by David Hicken Associates Ltd (922)

RN156 BSF Planning Consultants (1871, 1872)

RN163 The Roger Wenn Partnership (930)

RN197 Cluttons (237)

RN201 South Street Residents (1547)

RN208 Thanet District Council (754)

RN227 B&Q Plc Represented By RPS (1667)

RN255 GOSE (2660)

- Too restrictive; allow for alternative employment generating development on allocated employment sites
- Criterion (b) should be deleted from policy or the particular objectives specified in more detail
- Inadequate provision for economic development
- The Joseph Wilson Estate should not be included as a cluster business site
- Other employment sites of greater importance to the local economy, accessible to their local communities, and should not be redeveloped for housing e.g. Sea Street, Herne Bay.
- Should be a further allocation close to the New Dover Road Park and Ride
- Allocate land to the south of the John Wilson Business Park for mixed use development, inc. employment
- To improve clarity, the word 'or' should be added before criterion (b) in policy ED1
- Talmead site should be allocated for business use within the urban area
- Need to consult National Grid re the employment allocation at Vauxhall Road, Canterbury (overhead transmission lines)
- Object to the allocation of employment sites and the protection of existing ones. Plan is also vague regarding quantity of employment land allocated & expansions at existing sites
- Object to expansion of Joseph Wilson Business Park, as it includes SLA, close to Brooklands Farm and housing, would need landscaping and infrastructure. Growth could be accommodated in Herne Bay.

Re: A3/019 – Amended Policy ED1

RD118 Kitewood Estates (20465)

- Reword to state that all or part redevelopment of other uses will be supported to trigger development on key employment sites such as Blacksole Farm
- Rural priority area should focus on brownfield land. Insufficient emphasis is given to opportunities at Hersden to achieve objectives for PAER strategy

Re: A3/020 – New paragraph 3.22a

RD020 Wilks (20047)

RD126 Pelham Homes Ltd represented by Jennifer Owen & Associates (20375)

RD146 BSF Planning Consultants (20701)

- Welcome recognition that additional employment land is allocated to accommodate the loss of sites to housing development etc. but submit that insufficient land has been allocated
- The sites allocated for housing or mixed use and currently in use as employment sites have not been subjected to any analysis to determine whether the proposed uses will cause unsustainable development due to loss of employment opportunities. Delete para and reassess
- Para 3.22a after “within urban areas ” add new second sentence "No incursion onto new land; reused land only"

Re: A3/021 – Amended paragraph 3.16

RD137 MHP Partnership represented by Davies Arnold Cooper (20626)

- Focus on brownfield land. Hersden can meet PAER opportunities

Reasoning and Conclusions

4.1 As with the Housing Chapter, this Employment Chapter has undergone significant alteration between its initial make-up in the First Deposit Draft and the version before me,

following the Inquiry. The Council has had a change of mind on the composition, nature and significance of its key office locations – “office nodes”, and this change of mind was crystallised only after the Inquiry started. I consider the bulk of this changed thinking below in paragraphs 4.30-4.60, discussing objections to Policies ED6 and ED7a. All the major objections concerning evolving Council policy to Hersden have been considered earlier in my report in my Chapter Three (paragraphs 3.3.104-3.3.137 and Section 3.4), as that appears to me the most appropriate place to look at this controversial location in the round. My consideration of Hersden matters in that chapter does not, of course, mean that I ignored the economic and employment context; my thinking on Hersden is informed by all the material in the emerging Local Plan, and all the evidence I heard or read that dealt with it, or alluded to it.

- 4.2 This initial tranche of objections covers the initial statement of objectives, then contextual and descriptive paragraphs that give a factual picture of the Canterbury economy. After that there is an account of the Council's economic strategy, and then Policy ED1 and its supporting text.
- 4.3 In this section of objections, the Council has made a number of Proposed Changes during the Inquiry, a part of its radical change of view on appropriate locations for new employment outside urban areas. PC3/004, PC3/005, PC3/006 and PC3/012 revise the Council's previous view that Breach Farm should be an office node, adding a new paragraph 3.24a to say that employment floorspace there should be capped at its present level, and amending paragraph 3.25, Appendix 4 and the Proposals Map to identify it as an existing employment site/cluster.
- 4.4 The Employment Objectives have not attracted major criticism, and the Council has agreed to reinstate a part of the last specific objective through Proposed Change PC3/001: “to increase average earnings in the District” which seems uncontentious to me. The revised factual text on the Canterbury economy in the Revised Deposit Draft also appears to me quite satisfactory.
- 4.5 The re-drafting of the text on the Economic Strategy has not attracted fundamental opposition, neither as regards its relatively conventional sentiments about protecting and promoting the existing economy nor, perhaps more surprisingly, in its (non place-specific) sentiments about promoting the development and growth of high quality/high value-added growth enterprises. Revised Deposit Draft objectors press for more such locations, if anything. Again I see no need for further alteration of this text.
- 4.6 Although some objections made to them make other points, Policy ED1 and its supporting text are no more than a straightforward expression of support for the protection of existing significant employment sites in the various parts of the District. I consider those objections that make other points under more relevant policy headings elsewhere in my report.
- 4.7 I turn last to objections about the material in paragraphs 3.22 and new paragraph 3.22a, concerning the provision of additional employment opportunities. I do not find a need to reword these paragraphs; however, it is necessary for me to state that I have looked with a proper degree of critical scepticism at all those sites mentioned in the Plan where Council proposals would remove unglamorous but apparently viable employment uses. This has been especially necessary in the urban areas, where the Council has been seeking to maximise housing yield from sites now occupied wholly or partly by employment. It seems to me that a certain degree of scruffiness and diversity of uses can sometimes add to the life and vitality of places, and I have borne that factor in mind in my recommendations.

Recommendation

- 4.8 I recommend that the Local Plan be modified to incorporate Proposed Changes PC3/001, PC3/004, PC3/005, PC3/006 and PC3/012, 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.

POLICY ED2 – JOSEPH WILSON BUSINESS PARK EXTENSION – AND PARAGRAPH 3.26, PLUS NEW POLICY ED2a

Objections and Key Issues

Paragraph 3.23

RN257 Herne Bay & District Chamber of Commerce (2159)

- Object to loss of employment sites from the town centres. Employment land should be close to town centres

Paragraph 3.26

RN067 Whitstable Society (688)

Re: A3/033 – New paragraph 3.26a

RD118 Kitewood Estates (20466)

- Objects to extension of Joseph Wilson business park - it is in the wrong location

Policy ED2

RN003 Hollamby Estates represented by Kitewood Estates (391)

RN114 Williams (909)

RN182 Little (220)

RN201 South Street Residents (1548)

RN298 McLachlan (2255)

- Object to the proposed allocation of the extension to the Joseph Wilson Business Park
- The allocation should be located on existing brownfield/industrial estates that remain vacant/underused, object to loss of countryside, more traffic and pollution
- Object to the extension of the Joseph Wilson Estate. It will lead to loss of amenity, loss of greenfield land and result in a deterioration of the visual and landscaping amenity of the area
- Object to extending the Joseph Wilson Estate. Loss of Special Landscape Area, habitats, impact upon infrastructure, poor access, increased pollution, sustainability scores badly, not needed

Reasoning and Conclusions

- 4.9 My findings have to be read in concert with my conclusions earlier in my report on the omission site on land south of the John Wilson Business Park, Ridgeway, Chestfield (paragraph 3.3.16-3.3.26). I am in sympathy with the Council's aim to diversify the District economy and to expand its capacity to provide more, high paid jobs. I also accept the case that the Council both wants to exceed the quantitative guidelines for employment floorspace. It perceives a need to demonstrate that there is a good supply of accommodation available, both to businesses wanting to relocate from less suitable sites in the District's three main settlements, and to new enterprises or footloose businesses coming from elsewhere. The success of the Council's ambitions for new urban housing on areas identified by its Urban Housing Capacity Study, in this Plan period and beyond, will be helped by adequate, diverse and realistic allocations, well related to the potential workforce and public transport, with good links to the main highway network.

- 4.10 This extension to the Joseph Wilson Park is on a site within an established Special Landscape Area, on the southern edge of Whitstable. Special Landscape Areas are: "recognised as being of a landscape quality and sufficient in scale to be of scenic significance in the county context", in the words of the Structure Plan's Explanatory Memorandum". Its precise boundary hereabouts was devised by the District Council and fixed in the Adopted Local Plan. The Council's defence of the allocation is that a careful assessment has been made of the site and its surroundings, and that it is well screened from longer views by the topography of the area – behind the 30 m contour and masked to a significant extent by the lie of the land from open land stretching southwards – so that it is better than other completely new sites on the edge of Whitstable.
- 4.11 I do not agree with the Council's view that there would be a lack of adverse impact resulting from an allocation here. The extension intrudes southwards on to open agricultural land, with no real regard for the local topography. Its southern extent is delineated by a straight boundary unrelated to physical features, or even approximate land contours. Its western boundary marks another gap, of a geometrical rather than a natural looking kind, between the extension and the Golden Hill housing allocation. From walking the line of the Crab and Winkle footway/cycle network route southwards from the site, I find that the impact of such a large extension would be of a marked and adverse kind. This would be little improved by the sort of major screen planting acknowledged to be necessary, but which would take a number of years to mature. Some estimate of the much greater future impact on open countryside to the south can be gained from the fact that parts of existing buildings on the Industrial Estate are already visible to walkers on the Crab and Winkle Line, as it crosses the A299, and from further south.
- 4.12 I do not share the Council's view that the impact of this scale of urban extension would be small, and I cannot believe that such a sanguine attitude to impact would have been taken if this had been a housing proposal, rather than a problematic, large employment site.
- 4.13 It is true that the proposal would build on success, in the sense that the existing Joseph Wilson Estate is successful as a traditional industrial estate of indifferent appearance. Vacancies there were minimal at the time of my Inquiry. What I saw and heard on several visits suggests that the estate is not a good neighbour to the occupants on the housing along South Street. The new extension land would not, admittedly, have the same problem of many nearby houses, being in open countryside. However, this would be a very large extension, bigger in overall area than the existing estate. The Council is adamant that direct access would not be permitted off South Street, although this does not mean that there would not be more commercial traffic overall using South Street to access the existing vehicular entrance. In the absence of any detailed access plan, it is unarguable that an improved vehicle route through the existing estate will mean some demolition of existing buildings now in use. I do not doubt that access of this kind could be achieved, and nobody has suggested that there are technical or safety drawbacks that could rule out such an access. However, I find it hard to believe that this form of access would not add materially to the noise problems now experienced in nearby South Street houses.
- 4.14 The Council's evidence is that it has not been possible to find viable useable sites along Thanet Way. Undeveloped land at the St Augustine's site was looked at and rejected. I found the Council's evidence about its reasons for rejecting land south of the nearby John Wilson Estate at Chestfield less than convincing. This last site had been a candidate for new housing in the process that led to the Adopted Local Plan, but it did not feature as an omission site in Inspector O'Rourke's report. That Plan did include the Chestfield site

well within the Whitstable Urban Area Boundary, though the land is open, undeveloped, former agricultural land – albeit privately owned and used by the public for informal access and recreation merely because there is no physical boundary preventing such benign trespass. It seemed clear to me that (understandable) local opposition had been a major factor telling against putting development on the Chestfield site. However, my Inquiry showed that local residents hold equally strong views about the demerits of the Joseph Wilson extension, even more sensitively sited in open countryside with a Special Landscape Area designation.

- 4.15 Given the superior planning merits of the land south of the John Wilson Estate, Chestfield, which I detail in my earlier findings, I conclude that to retain the present proposed allocation would not accord with the Council's Strategic development Objective (b): "to retain and add to the existing allocated employment land across the District, while seeking to protect the environment".

Recommendation

- 4.16 I recommend that the Local Plan be modified to delete references to the extension of land to the Joseph Wilson Business Park in this Policy, and that the land south of the John Wilson Business Park, Ridgeway, Chestfield be substituted for it in this Policy, with necessary altered wording on the lines suggested in my paragraphs 3.3.16-3.3.26 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.

POLICY ED3 – LAND AT HIGHLAND COURT – AND PARAGRAPHS 3.27-3.29

Objections and Key Issues

Paragraph 3.28

RN322 English Heritage (1778)

- The explanatory text should make clear that the policy does not relate to Highland Court itself

Policy ED3 – Highland Court Allocation

RN036 Highland Investment Co. Ltd represented by Goddard Planning Consultancy (678-690)

RN098 Ms P Gibb represented by David Hicken Associates Ltd (923)

RN113 Miss A Harris-Dean (910)

RN209 PACE (779)

RN228 Kent County Council (1640)

RN268 Trustees of Mount Discretionary Settlement represented by Cluttons (2005)

RN306 Parish Council of Bekesbourne with Patrixbourne (2322, 2323)

RN311 Bridge Parish Council (2281, 2282)

RN401 Byott (1321)

RN406 A. Gomez Ltd. (2620)

- No explanation why the need cannot be met by recycling derelict land or sites within an urban area
- Objection to identification of Highland Court Farm as an employment cluster; allocate it as a larger business park
- Say that "existing buildings" in ED3 and para 3.28 and 3.29 means the old model farm buildings in the north east of the site
- Delete this allocation in AONB, SLA and conservation area. Poorly served by public transport and will not meet employment objectives

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

- Need for effective lorry signing is installed.
- Supported, provided that the scheme is planned to fit the AONB.
- No planning link between the site's refurbishment & development of open space. Connective wording should be removed
- Include brownfield land only for development at Highland Court Farm
- Concerned that the development of Highland Court Farm would have an adverse impact on Higham Park Estate and Conservation Area. The development should have due regard to the parkland conservation area

Reasoning and Conclusions

- 4.17 The Council has put forward three relevant Further Amendments. FA3/001 adds a new last sentence to paragraph 3.27 to mention that the Highland Court land lies in an AONB and conservation area. FA3/002 adds a new last sentence to paragraph 3.29, requiring a landscaping strategy and comprehensive vehicle parking arrangements in any development brief. FA3/003 includes those last factors in a new criterion (c) in Policy ED3.
- 4.18 Highland Court already houses a significant amount of employment floorspace in existing buildings; these buildings appear to have grown from an origin in a former model farm near to, but quite separate from the II* listed building of Highland Court (formerly known as Higham Park), which stands in a parkland setting to the north-west. The Highland Court complex now comprises essentially two areas of building; the 3.17 ha of additional Grade 2 agricultural land identified for employment would link the two areas, but would not spread the developed area outside its broad confines into the open countryside beyond.
- 4.19 Clearly, this isolated but significant and well-established employment area will not disappear, and it is a very useful source of work in the wider rural area south of Canterbury, near to a number of small settlements and on a bus route. There is no obvious previously developed land opportunity for equivalent employment in the A2 or B2068 corridors. The Council sees B8 uses as the preponderant desirable activity on site, which seems reasonable, given the present scale and apparent success of the existing Gomez business there. Traffic is also routed away from the listed building at present, and there is good access to the A2 and the wider road network.
- 4.20 The physical context of the local area is highly sensitive, and but for the fact that a complex already exists, countryside and conservation policy considerations would be weighted heavily against more development. However, this particular part of the AONB designation is surprisingly well secluded, with heavy tree planting all around it, and a wider local topography that counteracts its location on a ridge. The site itself is inconspicuous to the general public travelling through the area, existing landscaping around the complex hiding much of it from the immediate area of the listed building. All things considered, I find that the amended Policy and supporting text result from a balancing exercise that respects the location, but increases its usefulness to the District economy. Given assiduous development control by the Council the net result could even enhance the setting of the listed building, and the surroundings of existing buildings at Highland Court. The price paid is a loss of relatively inconspicuous but unspoiled open land. In this instance I find the loss justified.

Recommendation

- 4.21 I recommend that the Local Plan be modified to incorporate Further Amendment Nos. FA3/001, FA3/002 and FA3/003, 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.

POLICY ED4 - LAND AT ST AUGUSTINE'S HOSPITAL - AND PARAGRAPHS 3.30-3.31

Objections and Key Issues

Paragraph 3.30

RN318 Mrs C Swire (2307, 2308)

- Restrictions on development at site 'C' St. Augustine's in para. 6.55 of adopted plan are not included in the deposit draft. These restrictions should be reinstated
- Mixed use development on site C, St. Augustine's is contrary to para 4.13 of the draft plan in terms of accessibility. Development of Site C should be abandoned, due to implications for the SLA and AONB

Policy ED4 – St Augustine's Hospital Chartham

RN255 GOSE (2661)

A3/023 – Amended policy ED4

RD079 GOSE (20182)

RD121 Mrs C Swire (20477)

- Adopted plan was more restrictive towards development of this site. Current plan places no height restrictions and other conditions. Any more buildings will seriously have detrimental effect on the Downs AONB. Ribbon development breaching the skyline
- Remove word "safeguarded"; suggest allocated

Reasoning and Conclusions

4.22 The objectors are not opposing development in principle on this eastern remnant of the former St Augustine's Hospital complex. The Council has put forward Further Amendment FA3/004, adding text to paragraph 3.31. Looking at the amendment, I consider it could be further improved if it read: "Any proposal on the site shall either re-use the existing buildings, or replace them with no net gain in building footprint. Given the site's location within the Special Landscape Area and at the edge of the Kent Downs Area of Outstanding Natural Beauty, any proposal will be subject to an agreed Development Brief. The aim should be to achieve respect for the intrinsic landscape value of the site and surrounding land through conscious design, minimising the visual impact of all new construction seen from nearby or far viewpoints."

4.23 A second Further Amendment, FA3/005, adds an uncontroversial new criterion (d) to Policy ED4, requiring a Development Brief for the site. I see no strong planning reason to change the word "safeguarded" to "allocated" in the second line of the Policy.

Recommendation

4.24 I recommend that the Local Plan be modified to incorporate Further Amendment No. FA3/005 as set out in Core Documents CD1.14, CD1.19 and CD1.21, and the altered wording I suggest in my paragraph 4.21 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.

NEW POLICY ED5a – AREA WEST OF CANTERBURY EAST STATION

Objections and Key Issues

RD056 Thanet District Council (20109)

RD116 Kent Messenger Group represented by BTF Lister (20438)

RD149 Network Rail (20726)

- Objects to additional employment land allocations at Canterbury East Station
- Objects to office allocation at KM building St Georges Place as inappropriate. Redevelopment for offices would not be viable unless supplemented by residential development. Allocation is significant burden on land; will inhibit future development & not achieve CCC objective of regeneration of area
- Objects to allocation of land to the south of Canterbury East Station for employment/office purposes. Should be allocated for housing in accordance with the Government's commitment to minimise Greenfield development. The FPD Savills study is flawed.

Reasoning and Conclusions

4.25 The First Deposit Draft allocated this land for housing. The Revised Deposit Draft changed the allocation to employment/office use along a strip of land south of the rail line, leaving existing land uses to the south of this new allocation without any specific allocation. There is little site-specific evidence from either Council or objectors on the matter. I understand why the latter should be disappointed by the prospect of an allocation that is almost certain to bring less development profit than housing. Given the physical character of the surroundings so close to a rail line, and the established industrial/employment land-use character, I am not minded to challenge the Council's conclusions that its action here is part of a thought-through process to provide new office accommodation and protect existing employment use in what it considers appropriate places.

Recommendation

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

NEW POLICIES: ED2a – EDDINGTON LANE, & ED2b – PROTECTION OF EXISTING TOURING SITES

Objections and Key Issues

Re: A3/036 – New policy ED2a

RD056 Thanet District Council (20108)

- Objects to additional employment land at Eddington Lane, Herne Bay

Re: A3/038 – New paragraph 3.54b

RD146 BSF Planning Consultants (20695)

- Full comments cannot be made on this change without the publication of the amendment to the UHCS

Re: A3/039 – New policy ED2b

RD079 GOSE (20183)

RD132 Whitstable Beach Campaign (20446)

- In Para 3.54a, after “located along the coast” add “inside the sea defences”, to prevent any assumption they can be located in high risk locations
- Word “resist” should be replaced with more definitive words such as “will not permit”

Reasoning and Conclusions

- 4.27 In the matter of the additional employment land at the former coal yard at Eddington Lane, I can find no reason to question the Council's judgement that the action should help to improve local job opportunities.
- 4.28 As to the matter of new touring sites, the suggested rewording of paragraph 3.45a would serve no useful planning purpose. However, the wording of Policy ED2b would be slightly improved if the second sentence began: "The Council will not permit the loss of existing sites unless...".

Recommendation

- 4.29 I recommend that the Local Plan be modified to incorporate altered wording as suggested in my paragraph 4.27 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.

POLICY ED7 – BUSINESS INNOVATION CENTRE AT UNIVERSITY OF KENT CAMPUS – AND PARAGRAPHS 3.42-3.47

Objections and Key Issues

Paragraph 3.42

RN061 PACE (31)

- PACE supports the idea of a small innovation centre at Beverly Farm, but is concerned about expanding this idea into a business park. Such development would require consultation with neighbouring districts. (Thanet an option?)

Paragraph 3.45

RN207 Reeves and Neylan (751)

- Definition of knowledge/research park unclear, although inference is would be a bias to innovation, research & incubation. This wouldn't assist the development of a wider knowledge-driven economy.

Paragraph 3.47

RN061 PACE (32)

- PACE supports a small innovation centre at Beverly Farm, but is concerned about expanding this idea into a business park. Such development would require consultation with neighbouring districts

Policy ED7 - Business Innovation Centre

RN038 Girlings Solicitors (1847)

RN152 University of Kent at Canterbury (943)

RN184 Kent Maritime Chamber of Commerce (146)

RN185 Lowe (157)

RN207 Reeves and Neylan (750)

RN255 GOSE (2662)

- The Innovation Centre allocation is on open land and in an AHLV and should be retained as such
- Confusion as to where innovation operations will locate once past that stage; there are no knowledge based business parks in the area. Wealth creation would therefore be lost
- No provision has been made to relocate businesses that outgrow the innovation centre at the University of Kent
- The terms "business innovation centre" & knowledge/research park" are not defined & don't make clear the proposed activity on the safeguarded land at University of Kent
- Amend ED7 to allow for conference centre/hotel as well as business innovation centre

Reasoning and Conclusions

4.30 The essential area of the Beverley Farm allocation exists in the Adopted Local Plan, shown on the Proposals Map. The University no longer seeks to include an hotel/conference centre within the Innovation Centre, and work on a Development Brief was underway at the time of my Inquiry. Other objections are really centred on the question of need for a larger business node than the Draft Plan envisaged. That is a matter which I discuss immediately in the following set of Policy objections. This Policy and its supporting text do not need verbal alteration.

Recommendation

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

POLICY ED6 - NEW ECONOMIC ACTIVITIES/KNOWLEDGE-BASED INDUSTRIES - AND PARAGRAPHS 3.38-3.41, TOGETHER WITH: NEW POLICY ED7a – OFFICE NODES, POLICY ED7b – RESISTANCE TO THE LOSS OF OFFICE ACCOMMODATION, & PARAGRAPHS 3.47 ONWARDS TO THE END OF CHAPTER

Objections and Key Issues

Paragraph 3.38

RN209 PACE (777)

RN207 Reeves and Neylan (747)

- Site the small knowledge activities in small dispersed clusters around the District
- DTI defines knowledge economy as research and innovation and more effective use of knowledge in all economic activities ; this includes professional services, but Plan separates these from knowledge economy definition

Policy ED6 Inward Investment

RN003 Hollamby Estates represented by Kitewood Estates (392, 393)

RN103 McCabe (547)

RN125 Snook (106)

RN131 Clarke Cooper & Co. (110)

RN184 Kent Maritime Chamber of Commerce (145)

RN208 Thanet District Council (769)

- Land resources earmarked in the Plan to encourage high quality knowledge-based economy inadequate and insufficient
- Plan should seek to re-address the employment imbalances between the coastal towns and Canterbury
- Not enough employment land allocated
- Although supported as an objective, this is not a land use planning policy and should not be expressed so
- Make it clear that Policy ED6 should not be interpreted as grounds for additional employment land release
- Not enough employment land has been allocated to achieve the objectives of this policy

Re: A3/067 – Amended policy ED6

RD071 Canterbury District Economic Partnership (20146)

RD079 GOSE (20186)

RD103 Canterbury District Chamber of Commerce (20274)

RD133 Reeves & Neylan (20490)

- Amended wording puts existing businesses wishing to reinvest & expand in District at a disadvantage. Reword Policy to encourage expansion of existing businesses

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

- Policy no longer supports reinvestment & in-situ expansion by existing employers. Key theme in economic strategy. This should be incorporated into local plan Policy in ED chapter
- Drafting gives more support to incoming businesses rather than those wishing to expand through deletion of reinvestment
- Objects to words "a positive approach/will seek to encourage"; should be replaced with more definitive words

Paragraphs 3.47 and 3.50

RN208 Thanet District Council (756)

RN207 Reeves and Neylan (752)

RN030 ADM Computing (674)

RN036 Highland Investment Co. Ltd represented by Goddard Planning Consultancy (681)

- Whilst supporting the innovation centre at UKC, object to allocation of extra land for employment in Canterbury District to support innovation centre.
- "Business Park" not defined in relation to knowledge-driven economy & needs clarifying in paras 3.47 & 3.50
- Activities such as retailing, wholesaling & distribution should not occur on Business Park
- Include a high quality business park allocation in Canterbury.
- Put a new high quality business park at Highland Court

Re: A3/045 – New Heading

RD110 PACE (20405)

Re: A3/046 – New paragraph 3.50a

RD110 PACE (20406)

RD118 Kitewood Estates (20467)

- LP makes no references to Structure Plan employment floorspace requirements which are net figures

Re: A3/047 – New paragraph 3.50b

RD110 PACE (20407)

Re: A3/048-A3/052 – New paragraphs 3.50c-3.50g inc.

RD103 Canterbury District Chamber of Commerce (20279-20283)

RD110 PACE (20408-20412)

RD139 Quadrant Estates represented by Goddard Planning Consultancy (20535-20537)

RD103 Canterbury District Chamber of Commerce (20280)

RD133 Reeves & Neylan (20496-20500)

RD143 South Canterbury Consortium represented by BSF Planning Consultants (20674-20676)

- Savills report only considered extent of demand from existing businesses; did not test wider market. There is broader demand for inward investment in Canterbury as an attractive location
- Savills survey is flawed; edge of town is not adequately defined. Office space take-up is misleading; only achieved because of lack of available high quality office accommodation
- Savills report was flawed; encouraged ideal choice of location & rent leading to edge of town preferences against acknowledged view of hi tech businesses clustering together. Flaw in annual take up figures & to whom the survey was sent

Re: PC3/007; replacement for para 3.50g

APC066 Canterbury South East Liberal Democrats (30081)

APC094 Thanet District Council (30120)

APC061 Thanet District Council (30067)

APC084 Dover District Council (30108)

- Is it intended that there will be little or no physical communication between the Business Innovation Centre, because of the 5 km of road between the sites?
- Proposal will undermine the efforts of PAER to attract investment elsewhere in the sub region
- A single office node will serve to undermine the efforts of the PAER
- Allocation beyond Canterbury's strategic requirements, development not appropriate within Plan period, other potential locations, impact on surrounding area.

Re: A3/053 – New paragraph 3.50h

RD103 Canterbury District Chamber of Commerce (20284)

RD110 PACE (20413)

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

RD133 Reeves & Neylan (20501)

RD143 South Canterbury Consortium represented by BSF Planning Consultants (20679)

- Strict adherence to Policy for allocation of site will not meet needs of business. Certain sites will not be available. Station Road West needed for high speed link. Police Station not available, nor Clarkson House because of certain leases
- Policy will not meet needs of business, as they require relocation to what would be unacceptable locations
- Specific office proposals inappropriate to meet the identified need for employment land. The site at New Dover Road/ A2 Canterbury Bypass would be the most appropriate form of provision for such need

Re: A3/054 – New paragraph 3.50i

RD020 Wilks (20049)

RD024 Wratten (20056)

RD056 Thanet District Council (20110)

RD059 Baker (20125)

RD103 Canterbury District Chamber of Commerce (20285)

RD110 PACE (20414)

RD116 Kent Messenger Group represented by BTF Lister (20437)

RD117 KCC Land Use & Transport Policy (20439)

RD118 Kitewood Estates (20468)

RD124 Stansfield (20342, 20346)

RD127 Telereal Development Ltd Represented By RPS (20368)

RD133 Reeves & Neylan (20502)

RD143 South Canterbury Consortium represented by BSF Planning Consultants (20680)

RD146 BSF Planning Consultants (20714)

RD149 Network Rail (20727)

- Objects to office accommodation Whitstable Harbour. Not an active working harbour feature, not a good environment for offices: noise & smell. If replacing former office at West Gate it will reduce car parking. More suitable site is Regent/High Street, which should be mixed use not housing
- Station Road West car part should not be allocated for anything other than car parking, until the potential for West Station high speed link to London is clarified
- Use of Canterbury Road West Car Park for offices will result in insufficient car parking provision once Canterbury is served by fast trains
- Para 3.50i: re John Wilson Business Park Add "No crossing the Ridgeway to take place"
- Objects to additional office allocations
- At least some of land allocated for office accommodation should be reserved for car parking for Canterbury West Station
- Whilst office use may be appropriate on Telephone House site, it should not be an absolute prerequisite of any redevelopment of the site. Other appropriate redevelopments would be contrary to this Policy - Delete ref to BT House / Bingley Centre
- No office allocation at Hawthorn Corner. More sustainable locations nearer Herne Bay. Allocation contrary to criteria set out in paragraph 3.50h
- Strict adherence to Policy for allocation of site will not meet needs of business. Certain sites will not be available. Station Road West needed for high speed link, Police Station not available, Clarkson house because of certain leases
- Objects to office allocation at Kent Messenger building. St George's Place inappropriate. Redevelopment for offices not viable unless supplemented by residential development. Allocations is significant burden on land; will inhibit future development & not achieve CCC objective of regeneration of area
- Object to Hawthorn Corner; greenfield site outside defined urban area; conflicts with RS5 and RS4, not needed in quantitative terms. There are other sites available at Blacksole Farm & Eddington, new slip road is not practicable with design of existing junction
- Object to specific office proposals as these are not considered to be appropriate to meet the identified need for employment land. The site at New Dover Road/ A2 Canterbury Bypass would be the most appropriate form of provision for such need

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

- Objects to allocation of land to the south of Canterbury East Station for employment/office purposes. Not available within plan period; Should be allocated for housing in accordance with the Governments commitment to minimise Greenfield development. The FPD Savills study is flawed

Re: A3/055 – New paragraph 3.50j

RD110 PACE (20415)

RD117 KCC Land Use & Transport Policy (20440)

RD143 South Canterbury Consortium represented by BSF Planning Consultants (20681)

- Specific office proposals not appropriate to meet the identified need for employment land. The site at New Dover Road/ A2 Canterbury Bypass would be the most appropriate form of provision for such need
- Para 3.50j has no foundation in existing or emerging SP Policy for scale of additional land identified at proposed office nodes beyond existing urban areas on greenfield land. City Centre more sustainable & would aid regeneration

Re: A3/056 – New paragraph 3.50k

RD004 Blean Parish Council (20213)

RD020 Wilks (20048)

RD056 Thanet District Council (20111)

RD066 Parkinson (20137)

RD090 Bekesbourne with Patricxbourne Parish Council (20197)

RD100 Maltby (20269)

RD103 Canterbury District Chamber of Commerce (20286)

RD110 PACE (20404, 20416)

RD112 Canterbury Conservation Advisory Committee (20429)

RD117 KCC Land Use & Transport Policy (20441)

RD125 Crystal Childcare Ltd (20348)

RD133 Reeves & Neylan (20503)

RD137 MHP Partnership represented by Davies Arnold Cooper (20661)

RD140 Maylam (20530)

RD143 South Canterbury Consortium represented by BSF Planning Consultants (20682)

- Sites allocated are too small to enable a business park to be established, likely to isolate any knowledge based business relocating; would act as deterrent to 1st occupier
- Breach Farm is too remote and away from major centre of population, with poor access to grade separated junction with A2 & A260
- Para 3.50k: after development principles add "Without taking any new land". No greenfield development at Wraik Hill or Highland Court
- Object to Highland Court; inadequate infrastructure, services roads, main services. Narrow country lanes unsuitable and already carry a dangerous level of traffic around A2 junction greenfield site. Conflict with County and District countryside policies
- No objection to overall strategy, but sites suggested are badly equipped, not enough research has been carried out for the sites
- Supports expansion of Wraik Hill employment area, provided no extra traffic is generated through Blean
- Specific office proposals inappropriate to meet the identified need for employment land. The site at New Dover Road/A2 Canterbury Bypass the most appropriate form of provision
- Offices to be in proposed regeneration zones before out of town office nodes. Concerned scale & form development at Barton Business Park & Brett's HQ at Milton; should be carefully planned as over-development will have a major impact on landscape
- Para 3.50j has no foundation in existing or emerging SP policies for proposed office nodes beyond ex-urban areas on greenfield land. City Centre more sustainable & would aid regeneration. Could agree to Wraik Hill & Breach Farm with floorspace restrictions to agreed max
- Part of the allocated land at Wraik Hill should be designated as an area for childcare provision.
- Do not support office nodes locations: car dependent and would increase travel demand in conflict with amendment A7/010 in particular Barton BP, Highland Court & Breach farm
- Milton Manor - objection to allocation of open land as office node

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

Re: Appendix 4 - Aa4/002 – Office Nodes

RD066	Parkinson (20141)
RD090	Bekesbourne with Patricxbourne Parish Council (20198)
RD100	Maltby (20270)
RD112	Canterbury Conservation Advisory Committee (20430)
RD125	Crystal Childcare Ltd (20349)
RD137	MHP Partnership represented by Davies Arnold Cooper (20662)

- Part of allocated land at Wraik Hill should be designated as area for childcare provision
- Against car dependent office node locations increasing traffic demand: Barton Business Park, Highland Court and Breach Farm
- Against loss of open land at Barton and Wraik Hill locations; former a prominent, undeveloped and important part of the Stour Valley corridor
- Highland Court highly visible, contra R3, inappropriate for rural location; detrimental to flora and fauna, increasing traffic on country lanes; poor access
- Priority should be offices in proposed regeneration zones; fears for adverse landscape impact in rural locations
- Sites inadequately researched and badly equipped

Re: PC3/008; replacement for para 3.50k

APC010	JWT Wise (30014)
APC080	CPRE (30095)
APC081	LANRA (30097)
APC023	AR Blake (30027)
APC082	Mrs P Robinson (30098)
APC002	Bekesbourne with Patricxbourne Parish Council (30004)
APC003	Mr & Mrs Kennelly (30005)
APC004	AG Mitchell (30006)
APC005	Mr J Kerr (30007)
APC006	JEE Hanson (30008)
APC007	Old & New Dover Roads Residents Association (30009)
APC008	RG Page (30012)
APC024	TA Frier & Miss D Smith (30028)
APC012	A Williamson Powell (30016)
APC021	Mr & Mrs PF Cooling (30025)
APC017	Canterbury Conservation Advisory Committee (30021)
APC011	EM Darrington (30015)
APC020	Mr & Mrs BR Bray (30024)
APC019	Miss J Charlton (30023)
APC022	Mrs S Ingall (30026)
APC013	Mr & Mrs S & J Wilson (30017)
APC018	Mrs J Sutton (30022)
APC041	KH Filmer (30047)
APC025	M Northey (30029)
APC073	MR Stevenson (30088)
APC014	Mrs J Fox (30018)
APC015	M Crux (30019)
APC016	K Young (30020)
APC009	MP Sims (30013)
APC052	Mr & Mrs P Sims (30058)
APC059	G Reilly (30065)
APC058	S Reilly (30064)
APC057	Ms M Reilly (30063)
APC056	Mrs S Reilly (30062)
APC055	D Buckley (30061)
APC076	C Mills (30091)
APC053	Mr & Mrs MC Deal (30059)
APC050	TR Jones (30056)
APC049	M & P Kielty (30055)
APC047	J Clarke (30053)
APC054	A Jeffers (30060)

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

APC077	Mrs L Hope (30092)
APC079	E Parkinson (30094)
APC026	J Corfield (30030)
APC074	TJ Lynch (30089)
APC027	Mr & Mrs M Lang (30031)
APC072	NS & JP Jones (30087)
APC060	Mr & Mrs Godden (30066)
APC070	GRD Manley (30085)
APC061	Thanet District Council (30068)
APC067	D Linfoot (30082)
APC066	Canterbury South East Liberal Democrats (30080)
APC063	E Kent Green Party (30072)
APC045	PACE (30096)
APC071	Mr & Mrs T Mansfield (30086)
APC034	PJR Evans (30038)
APC122	Mr & Mrs Sutton (30157)
APC039	HM Russell (30044)
APC038	Ms C de Caires (30042)
APC037	Mr & Mrs J Bailey (30041)
APC042	Ms G Armstrong (30046)
APC035	Ms M Connelly (30039)
APC043	S Sloffham (30048)
APC031	East Kent Green Party (30035)
APC030	Mrs A Garside (30034)
APC115	DA Fawke (30150)
APC036	Mr & Mrs G & P Ward (30040)
APC090	M Esdale (30116)
APC113	M Steed (30149)
APC112	Ms M Smith (30148)
APC111	A Jeffers (30147)
APC110	H Macdonald (30146)
APC109	Ms D Laven (30145)
APC105	NA McDavid (30140)
APC094	Thanet District Council (30121)
APC095	SPOKES (30123)
APC096	R Townsend (30124)
APC099	B Walshaw (30130)
APC100	Robert Brett & Sons (30133)
APC101	Oaten Hill and District Society (30136)
APC102	Ms L Gibson (30137)
APC104	Ms A Wood (30139)
APC108	Ms C Mather (30144)
APC116	Mrs J Munns (30151)
APC118	Ms J Horsley (30153)
APC119	RJ Smith (30154)
APC120	Mr & Mrs Bell (30155)
APC103	Ms D Gillespie (30138)
APC097	Ms P Morgan (30113)
APC085	Mr K Sellwood (30111)
APC040	The Barton Association (320045)
APC084	Dover District Council (30109)
APC102	Ms L Gibson (30137)
APC092	Ms D Esdaile (30118)
APC091	Ms A-M Marriott (30117)

- Lack of consultation
- Erodes the green gap between Canterbury & Bridge; AHLV, Conservation area, greenfield site
- Lack of public information, pollution, contra character of the area, adverse local landscape impact
- There must be no access from Barton Estate
- Little Barton Farm, increased traffic on A2/A2050. Support proposal if slip roads at A2 junction; suggest woodland is available for public, a separated cycle route & cycle parking provided, future expansion restricted
- Sensitive area, loss of amenity, harmful to habitat, noise, pollution, traffic congestion, pedestrian safety

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

- Sets a precedent for more development, area is predominantly residential
- Adverse impact on local properties
- Need for a passageway between the residential and proposed business area, farmland with no permitted development. Wrap the community woodland belt all the way around the development, correctly designed and landscaped
- Loss of prime farmland, possibility for future infilling
- Brownfield land should be developed first, no infrastructure
- Will degrade the living environment of South Canterbury
- No need for business park
- A single office node will serve to undermine the efforts of the PAER.
- 40ha commercial development should not be considered until a study is carried out covering all the implications and requirements
- More appropriate locations should be looked for
- Far in excess of demand, unsustainable
- Loss of invaluable heritage for future generations
- Contrary to Policy E8 of RPG9 & Policies E1, E3 & E11 of Kent Structure Plan
- Loss of horse-riding land
- Need for further housing, no need for more business parks
- Loss of attractive approach into Canterbury
- If proposal goes ahead, close North Downs cycle way entirely to cars
- Preserve Pilgrims Way for future generations
- Needs currently outstretch the supply at Milton Manor Farm, suitable environment for office/high tech related development, site well located, well screened, no landscape designation
- Would prefer park to be allocated at Little Barton Farm rather than site behind Park & Ride, however objects in principle
- Where will all the employees live? Could expand into haulage business

Re: PC3/009; deleted office node notations for Breach Farm, Highland Court and Milton Manor from the Proposals Map (Policy ED7a)

APC088	Highland Investment Company (30114)
APC064	Reeves & Neylan (30075)
APC065	Canterbury District Chamber of Commerce (30078)
APC123	Jennifer Owen and Associates Ltd (30158)
APC126	Kent County Council (30165)
APC007	Old & New Dover Roads Residents Association (30010)
APC124	Highways Agency (30160)
APC100	Robert Brett & Sons (30131)

- Retain Highland Court as an office node, no local demand to support development of a major business park
- Businesses will be prejudiced by the existence of policy ED7a
- Possible concerns regarding the transport impacts on A2
- Objection to deletion of Milton Manor Farm as an office node and the substitution of an extended area of land at Little Barton Farm
- Needs currently outstretch the supply at Milton Manor Farm, suitable environment for office/high tech related development, site well located, well screened, no landscape designation
- Deletion of 3 small sites with one large one means more traffic, local impact, and detriment to the locality

Re: PC3/010; identification on Proposals Map of extended "Office Node" at Little Barton Farm

APC094	Thanet District Council (30122)
APC061	Thanet District Council (30069)
APC084	Dover District Council (30110)

- Proposal will undermine the efforts of PAER to attract investment elsewhere in the sub region
- A single office node will serve to undermine the efforts of the PAER
- Allocation beyond Canterbury's strategic requirements and needs, development not appropriate within Plan period, other potential locations, impact on surrounding area

Re: PC3/011; amendment of Appendix 4 (Aa002) to delete Breach Farm, Highland Court and Milton Manor from the list of "Office Nodes"

APC100	Robert Brett & Sons (30132)
APC007	Old & New Dover Roads Residents Association (30011)

- Needs currently outstretch the supply at Milton Manor Farm, suitable environment for office/high tech related development, site well located, well screened, no landscape designation
- Should be small development; brings problems of traffic, local impact, detriment to character of the locality

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

Re: PC3/012; Amendment of Appendix 4 (Aa003) to add Breach Far, Barham to the list under Canterbury APC098 Amirage Properties (30129)

- Unsustainable, no study of employment rated demand in this area, businesses would not be attracted to this area

Re: A3/057 – New Policy ED7a

RD056 Thanet District Council (20112)
RD103 Canterbury District Chamber of Commerce (20271)
RD108 South East Estates represented by BSF Planning Consultants (20299)
RD110 PACE (20417)
RD117 KCC Land Use & Transport Policy (20442)
RD133 Reeves & Neylan (20488)
RD143 South Canterbury Consortium represented by BSF Planning Consultants (20683)
RD102 Highways Agency (20262)

- Policy Ed7a add new criterion (iii). Effect of the development on the highway network not to be detrimental in term of congestion or road safety. This would be to safeguard operation of highway network & facilitate provision of offsite developer funded highway improvements where appropriate
- Policy unduly restrictive; will not enable District to have modern Business park during plan period. Similar businesses like to locate near each other - no opportunity e.g. knowledge based businesses
- Wraik Hill should be specifically referred to in Policy ED7a; other sites for employment development are identified by a specific Policy number. Delete final clause of proposed Policy ED7a
- Object to specific office proposals as these are not considered to be appropriate to meet the identified need for employment land. The site at New Dover Road/ A2 Canterbury Bypass would be the most appropriate form of provision for such need
- Will not enable District to have opportunity of developing a material pool of knowledge based businesses
- Against additional office employment and office node allocations
- Delete Policy; no quantitative need for office nodes; existing office function has been exaggerated; existing office use is insignificant; largely greenfield allocations

Re: A3/058 – New heading

RD110 PACE (20418)

Re: A3/059 – New paragraph 3.50l

RD110 PACE (20419)

Re: A3/060 – New paragraph 3.50m

RD110 PACE (20420)

Re: A3/061 – New paragraph 3.50n

RD110 PACE (20421)

Re: A3/062 – New policy ED7b

RD103 Canterbury District Chamber of Commerce (20272)

RD110 PACE (20422)

RD128 Unite represented by Turley Associates (20352)

RD133 Reeves & Neylan (20489)

RD079 GOSE (20184)

- Objects to word “safeguard” in Policy; should be replaced with more definitive words such as “allocated”
- ED7b will operate unduly against existing professional services sector in unsuitable town centre premises. They need maximum value to relocate and expand. Existing office accommodation not easily upgraded to meet modern standards. Retain existing office, if fit for purpose
- Policy will increase unlet office accommodation
- ED7b inflexible in terms of exceptions, and does not reflect the range of office space available, making some units more appropriate than others for protection. Amend by referring to a more flexible approach for older buildings and 100% affordable housing

Re: A3/063 – New heading

RD110 PACE (20423)

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

Re: A3/064 – New paragraph 3.50p

RD110 PACE (20424)

Re: A3/065 – New paragraph 3.50p

RD110 PACE (20425)

Re: A3/066 – New Heading

RD103 Canterbury District Chamber of Commerce (20273)

- By deleting reinvestment and introduction of new heading, CCC is giving more support to incoming businesses rather than those wishing to expand

Reasoning and Conclusions

- 4.32 The Revised Deposit Draft had already produced a significant amount of altered and repositioned text in this Plan Chapter. By the end of my Inquiry, the Council had also put forward a number of Proposed Changes to the final draft text which reflect further significantly revised thinking on its part.
- 4.33 Proposed Change PC3/002 amends the new heading preceding paragraph 3.41, deleting “inward”. PC3/003 reinstates mention of “re-investment and in-situ expansion by existing employers” to Policy ED6.
- 4.34 A number of Proposed Changes – PC3/007, PC3/008, PC3/009, PC3/010 and PC3/011 – bring forward the new concept of a 20 hectare site at Little Barton Farm as one of two new District Office Nodes, alongside Wraik Hill, Whitstable. At the same time, Milton Manor, Highland Court and Breach Farm lose the status of office nodes.
- 4.35 During my Inquiry, the County Council’s proposed pre-EIP Changes (June 2004) to the emerging Kent and Medway Structure Plan became available. Identified in Draft Policy FP1 – Employment Land Provision was a new provision of “up to 20 hectares for office accommodation and business development at the City” (i.e. Canterbury). This stance is explained in the officer-produced “Joint Statement on Economic Need” (CD3.15). The City and County Council view is that, though a large proportion of Canterbury employees work within what is termed broadly the “knowledge economy”, the “District has yet to develop a strong knowledge-based business sector that provides high earnings and productivity, and leads to strong business formation in the area”. The Joint Statement’s final paragraph contains a view that “it is appropriate to increase the size of the business and technology sectors in Canterbury District”, and that “this diversification, on the scale proposed, will complement and not supplant the existing economic roles of the District”.
- 4.36 Throughout the Inquiry, it has been the Council’s stance that the Structure Plan guidelines on employment floorspace for the period to 2011 are no more than guidelines, and certainly not ceilings. The Explanatory Memorandum itself says that they are not precise quantities, and that minor variations from them may be warranted. At the end of my Inquiry the only employment allocation in the emerging Local Plan seriously opposed by the County Council was that within the AONB at Highland Court, which I discussed above.
- 4.37 City Council evidence shows, in what appears to me a factually correct manner, the effects of its end-of-Inquiry position on the employment land supply, if its final proposed employment allocations were carried into an adopted Local Plan. It was put in to the Inquiry on 5 October 2004 in Council Appearance Statement CCC/PR/82, expanded by a Table produced at the proceedings. That position is calculated on the basis of:
- a) only two Office Nodes in the District, at Barton Farm, Canterbury, and Wraik Hill, Whitstable; plus

b) calculation of the area of existing employment land lost to new housing as a result of the Council's proposed housing allocations; plus

c) the Council's final calculation of all other employment allocations.

- 4.38 The result is that the initial calculation of 47% oversupply of employment land in the emerging Local Plan over the Structure Plan Guidelines at the start of my Inquiry (CD 3.1 – Economy Core Proof), is reduced to 28% in the final figure over those same Guidelines. One significant way of looking at the 20 ha Barton Farm site is that its removal would bring about a shortfall of 3% in the employment land supply to 2011.
- 4.39 I have no reason to doubt the dependability of that calculation. Of the elements within it, the Wraik Hill location is not the subject of significant opposition from objectors. Element (b) is significant, even though I have not found it possible to endorse all the new housing allocations put forward by the Council. I have not opposed those proposed allocations in principle; rather, I have concluded that a number of them cannot be relied on to come about in this Plan period, although they may be achieved over a somewhat longer period. Barton Farm and the remainder of the employment allocations I discuss below.
- 4.40 It is thus true to say that the County Council as Structure Plan Authority does not object to the overall scale of employment allocations proposed at the Inquiry, despite specific opposition to a particular site.
- 4.41 I turn to the matter of the Office Nodes. Other than Wraik Hill and the original 7.5 ha Barton Farm site, the remaining three identified in the Revised Deposit Draft, and officially supported by the Council at the start of my Inquiry, always gave me the impression of being “penny packets” in rural surroundings, chosen for geographical variety rather than likely market appeal. Consequently, the Council's Proposed Changes to remove Breach Farm, Highland Court and Milton Manor seems to me no more than common sense planning.
- 4.42 The Breach Farm site is a former Pfizer site in an isolated position. It has proved hard to find a follow-on employment activity here, and there are some who hope that the site may be given planning permission for housing eventually. Given its isolated rural position, this is a site with virtually no positive planning credentials as a housing site. The Council's summation of the most desirable outcome – employment on an unexpanded site – in Proposed Change PC3/004 seems to me clearly correct.
- 4.43 I gave my opinion earlier in this chapter that the Highland Court site, on balance, merited some relatively inconspicuous expansion on to green land lying between two existing employment areas. There seemed little logic, but considerable harm in a wider take-up of c.4.5 ha of agricultural land around this isolated site in an AONB, for office-type uses. I fully support the Proposed Changes withdrawing this allocation.
- 4.44 The Milton Manor node site contained a large amount of attractive rural land, north-east of the area occupied by the premises of Robert Brett & Sons Ltd. Its location between Thanington and Chartham never seemed to me an obvious site for offices, so I also support the Proposed Changes withdrawing this allocation.
- 4.45 The enlarged Barton Farm allocation is perceived by the Council as viable, given its ability to re-accommodate: (i) existing office users in Canterbury unable to grow or rationalise their property in a tight knit, small historic city, (ii) “grow-on” space for business from the University Business Innovation Centre, and (iii) other related “high-tech” business development attracted to the city, perhaps linked to the development of businesses from

Canterbury's educational establishments. These are forms of development that fall within Use Classes A2 (financial and professional services), B1(a) (offices), and B1(b) (research and development, studios, laboratories and high tech).

- 4.46 Barton Farm's recognition as a key location for specialised employment came about late. Thus, though the procedures for advertising, consulting the public, and making the relevant Proposed Changes followed to the letter the procedures laid down in the Departmental "Green Book" (A Guide to Procedures, DETR, 1999), I find it easy to see why many counter-objectors were concerned and cynical as to the Council's motives. However, since the counter-objectors were in fact given reasonable opportunities and time to gather their thoughts, write objections and appear at my Inquiry, well briefed with background information about the Council's changed thinking, I see nothing wrong with the Council's actions. It is much better that the Office Nodes matter is before me in its most developed form, than that I should be writing a report without being privy to the Council's fully considered final views.
- 4.47 I accept the Council's stance that the change of mind for this significant new allocation sprang from at least two directions. The first was the objections from the County Council and others about the undesirable nature of scattered rural locations, taking up green field sites which did not have very good public transport links. The second was a series of objections, associated with more personal approaches to the Council from local firms and business organisations, backed by those taking forward the 7 ha Kent University Enterprise Hub, from its project stage to start-up. The stance which the Council and the latter faction now take favours consolidating provision for Canterbury-related enterprises on a green field site. That site is immediately south-east of the substantial but utilitarian Barton Business Park which, despite its name, is no more than a conventional industrial estate.
- 4.48 As to the opportunities elsewhere in Canterbury to site an allocation of this scope, able to grow over a period of years, I find the Council's analysis of deficiencies of the City Centre and the various Regeneration Zones to be realistic and convincing as regards available space, development potential, and market realities (CD3.14, paragraphs 3.9-3.11). I agree with the Council that the easiest possible accessibility to the A2 trunk road – the key connector to the strongpoints of the regional economy – is necessary for success. CD3.14's analysis of possible alternative sites around the city edge shows no easy alternative without substantial planning drawbacks. This close analysis has not been able to identify a feasible site close to the University Enterprise Hub, or with better connections to the labour markets of Whitstable and Herne Bay.
- 4.49 The site chosen develops the concept of the former Barton Park node in the Revised Deposit Draft, extending the allocated business use area southwards, and providing for a significant landscaped screen along the New Dover Road frontage. While the designation on the Proposals Map would leave a permanent green gap between the existing urban fringe and the western edge of the allocation, possibilities for extension of a successful area are available on other open land to the south and east. I regard this as no more than sensible longer-term planning to accommodate organic growth, if the initial concept proves successful. However, I can also see, though I do not agree, that this stance will suggest to those opposed to the whole idea that development could or will sprawl significantly in coming years. It will be vital to maximise the quality of the structural landscaping, and ensure the most sensitive master-planning of built development, in order to minimise impact on the green surroundings of the City hereabouts.
- 4.50 The location chosen will obviously result in far more traffic activity than hitherto. Even so, the opportunities are there for getting a high proportion of the resultant trips partially

or wholly made using public transport. A rigorous Transport Assessment would be a prerequisite, and the evidence makes me confident that the Council can ensure that all the ramifications of changed road use and necessary road works will be identified, so that change can be brought about in phase with development on the site. The New Dover Road park and ride area is close by; the other park and ride facilities could be made to provide enhanced public transport connections to this site. Travel Plans, influencing the travel choices of workers in each new enterprise on site, could be brought about through the planning application system, and monitored and updated over time.

- 4.51 The establishment of development principles through mechanisms like development briefs is mentioned in the text of Proposed Change PC3/008. Such action would be able to minimise the intrusive effects of development on local residents, to maintain and enhance access through the site for pedestrians and cyclists, and to keep all undeveloped parts of the site green and un-blighted until needed for development.
- 4.52 Nobody, not I nor the Council, nor those favouring the Barton Farm allocation, can be sure that this office node on the edge of the City will have the effect the Council hopes for. The Council took recent advice from Messrs FDP Savills, and the latter gave a view in 2002 that the unsatisfied demand for office space in the District was not likely to possess the scale and value to support a major, modern, low-density, out of town business park. The Council has pondered that advice, and come to a different view. It is confident that there is a valuable Canterbury "brand" that is inherently attractive to existing and potential enterprises in the outside world. It wishes to make the ambitions behind the University Enterprise Hub credible by providing a permanent home for newly generated enterprise. It also desires to provide a new home for existing City businesses unable to expand, and thereby tempted to move to another part of Kent with unfettered development land.
- 4.53 The new node could provide a site now lacking in the District: part of the City, yet able to house a large number of modern businesses spaciouly but close to each other; a home to innovative, productive enterprises benefiting from the prestigious Canterbury image and capable of sparking further activities and attracting successor activities. I do not think it necessary that the Council should pretend to know precisely what the make-up of future occupiers of an office node here might look like. I find that the Council's final stance on this matter has been reached on the basis of rigorous thinking and is worth support. The Council is charged with looking to Canterbury's long-term interests, and like any large business it has to plan and provide a strategy for survival, adaptation and sustainable growth before foreseeable problems become acute and decline sets in.
- 4.54 In my opinion, the Barton Farm allocation is not the first step towards sprawl around Canterbury, but the meeting of one defined need. I see no good planning reason why the Council has to show evidence of actual economic decline to justify aspiring towards, and providing, a location for high quality development that will attract high quality enterprises. It does lack such a site close to the City at present. The historic City is small, tightly knit and utterly unsuited to major physical change of this kind. The existing Business Parks around Canterbury, Whitstable and Herne Bay, and certainly the existing Barton Business Park, are essentially older-type conventional industrial estates of utilitarian character and design, none in the first flush of youth. None is a suitable candidate for an add-on enclave of the kind proposed at Little Barton Farm.
- 4.55 If either Barton Farm or Wraik Hill is to attain the high quality of development aspired for, I consider that it would be wise to state clearly in the Plan that only new buildings that fall within Use Classes A2 (financial and professional services), B1(a) (offices), and B1(b) (research and development, studios, laboratories and high tech) will be given planning

permission there. I consider it would be prudent to expand on the reasons for that restriction, preferably in Policy ED7a. The sentiment I would like to see conveyed is that the allocations have been made on good quality open land for a specific purpose, and the Council will not give planning permission for other development there, if development of the kind aspired to is slow to appear, merely to get some form of activity started. The implication for Barton Farm, with its possibilities for future enlargement beyond a 20 ha confine, would be that if the policy failed to meet the Council's aspirations, the allocation would be removed and the site would revert to its former status in some future Local Development Framework.

- 4.56 I turn to the objections that the magnitude or location of Canterbury's final list of employment allocations offends overtly against the letter or spirit of RPG9, the Regional Planning Guidance for the South-East. It is the argument of some objectors that seeking to encourage substantial development in the District, to develop and grow knowledge-based and other employment enterprises, runs against RPG9's emphasis on development in the Thames Gateway and the PAERs in the former coal fields and coastal towns of East Kent.
- 4.57 The Council's evidence is that it wishes to diversify the District economy, and move away from what it sees as an over-dependence on employment biased towards the public sector, retail and leisure, with the attendant problems of low wages and seasonality. Its evidence shows a number of indices in which the District economy lags behind regional and county averages. It is not disputed that other Kent Districts fare worse in many respects, notably Thanet and Dover. Objectors have queried the seriousness of the Council's demonstrations of relative under-performance, with the inference that matters are acceptable, others areas fare worse, and that a drive to upgrade the District's economy is an unfair poaching of opportunities that poorer Districts should profit from – in other words, why does Canterbury need to improve a reasonable present position, and take green land to do it?
- 4.58 I see it as inevitable that Districts in Kent will compete for investment. Canterbury can legitimately defend its interests, rather than merely observe an overwhelming proportion of new investment go to West Kent. Canterbury District will not cease to be a nationally peripheral location, in a geographical sense, but its present activities must have suitable sites to diversify and change, and there must be sites where activities of the future, inherently unguessable in detail and exact kind at present, will be induced to locate. An attractive and diverse site portfolio appears to me to be essential. It may seem harsh, but I think that recommending against the Barton Farm office node would not mean that less favoured East Kent authorities would be the beneficiaries; it is more likely that West Kent/Ashford would get even more investment by default, Canterbury District being judged as a location without a single dedicated site capable of attracting new or relocated knowledge-based enterprises on any scale. Dover and Thanet Districts would receive tangible benefits from proximity to a stronger Canterbury economy, and the existence of the latter would tend to make the other two Districts somewhat less marginal and thereby more attractive than hitherto to new investment. I simply do not see those two Districts as natural recipients of the kind of Canterbury-related development aimed at on the Barton Farm site. Nothing in the development plan or regional planning guidance recommends that ring-fencing in Dover or Thanet's favour should obtain, or even be considered as a planning factor of real significance here. Moreover, I see no good reason to view the development of the economy in Kent as a zero sum game with a finite "pot".
- 4.59 Concerning the sites considered suitable for office locations in new paragraph 3.50i, none of the objections is of sufficient substance to convince me that the locations are unsuitable for this purpose.

- 4.60 Policy ED7a contains certain defined hurdles that a potential occupier of the two office nodes would have to overcome. This sequential test appears to me to accord well with national policy guidance, and the requirements should not prove so onerous as to act as real disincentives to a serious potential occupier. Policy ED7b does seem to me weakly worded at present. I see no reason why the second line of the Policy should not be reworded as: "...urban areas, planning permission will not be granted for development involving the loss of such accommodation, unless...".
- 4.61 Policy ED6 expresses sentiments that are quite appropriate, taking account of the needs of local employers as well as desired incomers. However, I share the GOSE opinion that its general welcoming tone falls short of what is required in a specific policy. I consider that the Council could well add it to paragraph 3.41 as more supporting text. Alternatively, it could be recast it to be more development control oriented, by saying that planning permission for the various activities will be granted, but adding a minimum number of criteria. Those criteria could focus on the general acceptability of a development in its physical context, and the Council is perfectly capable of formulating them itself, without specific prompting from me.

Recommendation

- 4.62 I recommend that the Local Plan be modified to incorporate Proposed Changes Nos. PC3/002, /003, /007, /008, /009, /010, and /011, as set out in Core Documents CD1.14, CD1.19 and CD1.21, and the altered wording I suggest in my paragraphs 4.53, 4.48 and 4.59 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.

OMISSION SITE: LAND SOUTH OF THE A257 LITTLEBOURNE ROAD, CANTERBURY

Objections and Key Issues

RN192 PJ & JE Holdstock (184)

- Allocate site for a range of uses such as: hotel, and/or fitness centre; sports/leisure/recreational facilities; roadside services facilities, possibly in conjunction with a park and ride site

Reasoning and Conclusions

- 4.63 This is an almost rectangular parcel of agricultural land (13.81 ha) beyond the Canterbury Urban Area Boundary, subject to open countryside policies. It has a long northern frontage to the A257, on the other side of which is a scattered pattern of housing along the road edge. The site and its surroundings are unquestionably rural in appearance and function, despite the closeness of the City to the west.
- 4.64 The objectors' proposals are put only in the barest outline. As the Council says in CD1.16, the site is unrelated in form or function to the wider urban area, it is not well served by public transport, and it is unrelated to other employment uses. I consider the proposals have no significant obvious planning merits.

Recommendation

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

OMISSION SITE: LAND NORTH OF STURRY ROAD, CANTERBURY

Objections and Key Issues

RN150 Mr A J Pierce represented by BSF Planning Consultants (956, 957, 958, 959, 960)

- Land should be allocated for industrial, commercial and retail purposes under ED1
- Objects to inclusion in Green Gap, under R7, of site east of Sturry Road Sewage Works
- Objection to inclusion of land within the area at risk from fluvial flooding, under C28 and C29
- Objects to inclusion in AHLV, under R6, of site east of Sturry Road Sewage Works

Reasoning and Conclusions

4.66 This is a broad L-shaped piece of land (just over 2 ha in area), used for keeping horses. In an edge-of-town area of scrappy visual character, this appears to me to be land of unquestionably rural character. It is sited to the east of, and immediately outside, the Urban Area Boundary in the Adopted and emerging Local Plans. In the emerging Local Plan, it is designated within the Area of High Landscape Value. It is also a significant part of a Green Gap, the pinch point designation intended to keep the separate identities of Canterbury and Sturry by preventing development that would lead to coalescence. Although the land east of the objection site contains a number of houses, greenhouses and polytunnels, I find that the predominant characteristic of the designated Green Gap on the north side of Sturry Road is openness, a quality which is highly vulnerable to any greater degree of physical development. The long, open site frontage here comprises about one fifth of the entire gap on the north side of Sturry Road. The value of physical separation between the City and Sturry seems to me self-evident. The case against development is unarguably increased by the location of the omission site within a river floodplain, in which Revised Deposit Draft Policy C28 states that no development will be permitted unless an exceptional justification can be demonstrated. There could be some building on this site, but it would need to be constructed in a non-standard way.

4.67 A main part of the objector's case is that the land would be of great value in accommodating displaced general employment uses from the draft housing allocations on previously developed land in the City, and from the four Regeneration Zones as these change their present character. The nearby Kingsmead Zone is considered particularly relevant to this site. However, the Council is allocating employment land measurably in excess of the Structure Plan floorspace guidelines, and other recommendations in my report do not remove that surplus. I conclude that the site is rightly located outside a well defined Urban Area Boundary, and that is an essential part of a worthwhile Green Gap designation.

Recommendation

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

OMISSION SITE: LAND ADJOINING THE JOSEPH WILSON ESTATE, SOUTH STREET, WHITSTABLE

Objections and Key Issues

RN200 The DC Bartlett Partnership (1543)

- Add a further area of extension to the Estate on 3B agricultural land, and remove it from the Special Landscape Area designation

Reasoning and Conclusions

4.69 This blade-shaped area of open agricultural land lies immediately south of the land allocated as an employment site in the Revised Deposit Draft. That allocation extends the Joseph Wilson Estate southwards, and I have recommended against the extension earlier in this chapter in paragraphs 4.9-4.15. If my recommendation is accepted this omission site would be seen as a totally isolated area, on part of a ridge that is highly visible over long distances to the south. That would obviously be unacceptable. The Council itself distinguishes between its own allocation, which it holds to be of greatly less impact viewed from the south, and this land, which it regards as a site that could not be screened. Apart from the overwhelming visual deficiencies of this site in open countryside, I also no strong employment need argument that could be deployed in support of the proposal.

Recommendation

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

OMISSION SITE: LAND NORTH OF ASHFORD ROAD, CHARTHAM

Objections and Key Issues

RN191 Newmafruit Farms Ltd (183)

- allocate as commercial/business on a site well related to the residential expansion of Chartham

Reasoning and Conclusions

4.71 This is orchard land north of the A28. Though there is an irregular pattern of houses and employment premises south and east of the site, this is indisputably a large, visually exposed site in open countryside. It is partly within the River Stour floodplain and thus additionally constrained, with inherent development problems. The local area is not far from either Canterbury City or the main settlement at Chartham, both of which are already sources of employment. Nor is there any overall shortage of existing or allocated employment sites in the District as a whole.

Recommendation

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

OMISSION SITES: (1) LAND OFF THE OLD DOVER ROAD, CANTERBURY, & (2) LAND SOUTH OF PONDS COTTAGES, DOVER ROAD, CANTERBURY

Objections and Key Issues

- RN154 South Canterbury Consortium represented by BSF Planning Consultants (938, 939)
- RN268 Trustees of Mount Discretionary Settlement represented by Cluttons (2006)
- Allocate c. 66 ha site as an excellent location for a new combined knowledge-based business park: well related to educational allocations, the urban area and with good transport and strategic road links
 - Remove the land from the AHLV designation
- RN353 Accor Hotels (2468, 2471)
- Dedicate the site by the proposed slip road from the A2 for roadside services, including an hotel, and remove it from the Area of High Landscape Value

Reasoning and Conclusions

- 4.73 Both of these sites are indisputably in open countryside, extending well beyond the limits of linear development running along the southern side of the Old Dover Road, and outside the Urban Area Boundary. Any development on Site (1) would significantly expand the built form of the City to the line of the A2 trunk road. If developed, I believe that the precedent set would create a number of unrealistic development expectations in its wake. There would be a ready-made planning argument for any developer to plead in pursuit of more building towards the line of the A2, filling open land between the western edge of this site, as far north as the Wincheap area.
- 4.74 The development sought at Site (1) is of the same kind as the Council now intends should occupy an extension of the Barton Farm allocation in the Revised Deposit Draft. I have, earlier in this Chapter, supported the Barton Farm concept, which has far less damaging consequences for edge-of-City land than the present site. I therefore see no real planning case of any merit to be made for an allocation here.
- 4.75 The proposal for roadside services, including an hotel, at Site (2) would fill in the much smaller (1.173 ha) triangular site at the south-east tip of Site (1). This site adjoins an area identified for improvement of the A2 slip road. Though the Council gave planning permission for an hotel on this site in the late 1980's, a later application for renewal was refused in 1996. The present objections are not supported by a convincing body of evidence to show real need for either the hotel or the roadside services in this rural area. Moreover, the Council's point that the mechanisms for slip road improvements are not yet established is not refuted or argued against.

Recommendation

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

OMISSION SITE: LAND SOUTH OF A2 HARBLEDOWN JUNCTION & CHINA FARM, HARBLEDOWN, CANTERBURY

Objections and Key Issues

- RN126 TG Redsell Ltd represented by BTF Lister Ltd (114, 115)
- Allocate the land for new commercial development: knowledge-based and high value added users (e.g.

INSPECTOR'S REPORT ON THE CANTERBURY DISTRICT LOCAL PLAN

incubator units and high spec office developments)

- Achieve objectives behind policy C5 – improvement of A2(T) junction and Wincheap traffic relief – through the allocation of the site for a business park

Reasoning and Conclusions

4.77 This is a very large wedge-shaped site of 85.81 ha, south of the A2 trunk road and well outside the Urban Area Boundary of Canterbury City in open countryside. It is a prominent, open site in agricultural use.

4.78 The development sought is of the same kind as the Council now intends should occupy an extension of the Barton Farm allocation in the Revised Deposit Draft. I have, earlier in this Chapter, supported the Barton Farm concept, which has far less damaging consequences for edge-of-City land than the present site, where the adverse planning consequences of large-scale physical development are difficult to over-state. I therefore find no real planning case of any merit for an allocation here.

Recommendation

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

OMISSION SITE: LAND AT WRAIK HILL, WHITSTABLE

Objections and Key Issues

RN147 SE Estates Ltd represented by BSF Planning Consultants (2019, 2020)

- Object to the non-allocation of land at Wraik Hill for residential development

RN119 George Wilson Developments Ltd (936)

- Allocate office village on 6.5 acres at Wraik Hill, close to the Chaucer Business Park, for 75,000-100,000 sq ft

Reasoning and Conclusions

4.80 The George Williams objection has been met in the Revised Deposit Draft by the allocation of the Wraik Hill office node, which also covers the whole site sought for housing by SE Estates Ltd. I have found no planning difficulty in agreeing with the Council about the merits of the Wraik Hill office node, which lies just south of the Whitstable Urban Area Boundary, well positioned on a crucial main road corridor within the District. The SE Estates Ltd objection has not been pursued in any detail since the publication of the Revised Deposit Draft, so I am presuming that this is no more than a technical objection left on the record.

Recommendation

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

OMISSION SITE: LAND AT HAWTHORNE CORNER, HERNE BAY

Objections and Key Issues

RN320 JTS Partnership (1991-1996, 2000, 2002)

- Allocate this previously developed land for employment and tourism development

Reasoning and Conclusions

- 4.82 The Revised Deposit Draft Local Plan complies with the desires of the objector by inserting a new Paragraph 3.50i, which confirms the designation on the Proposals Map of Hawthorne Corner, as a new employment allocation on 3 ha, stating this would be for office use and associated storage for FDS. The site was occupied by the local company FDS, but buildings on site were abandoned after a fire and consequent disrepair, with the company occupying other accommodation in the District. The allocation is regarded by the Council as commonsense, after grants of (as yet unimplemented) planning permission in 1998 and 2000 for a replacement building with offices, storage, production, and ancillary residential space. I find no flaw in the Council's thinking on the matter.
- 4.83 The objectors have not made any detailed or convincing case for the siting of an hotel here, some distance from the centre of Herne Bay. There is already an hotel allocation on a site at Eddington, closer to the town centre. The Council explains factually in CD1.16, pages 74-75, the reasons why no hotel all was included in the Adopted Local Plan, despite what transpired at Inspector O'Rourke's Inquiry. I have no evidence before me to suggest that market realities could sustain more new hotel accommodation in the Herne Bay area. Indeed, the Council has stated in evidence that a private sector study in 2003, prepared for the County Council and East Kent District Councils, concluded that likely future demand and lack of developer interest suggested no case for pursuing hotel accommodation at Herne Bay.

Recommendation

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