

These are the objections to planning application CA/23/01743 Popes Lane by Sturry Parish Council.

Sturry Parish Council are not in favour of this development taking place. Sturry is a village not a town or city and over the past five years there has been enough developments passed for the area and we are of the opinion that the area is being over developed.

## Planning Background

This site is not allocated for housing development in the current 2017 Local Plan and is not needed to deliver the housing targets set out in the Plan.

The 2017 Canterbury Local Plan, as stipulated in the then current NPPF, stipulates use of the ONS growth predictions for 2014. For Canterbury this produces a housing target which is far higher than that of current predictions. Policies relating to housing targets in the 2017 Canterbury Local Plan are therefore out of date in relation to ONS predictions of need and should be reduced. As the current Local Plan was not adopted until 2017, questions need to be asked over whether the current Local Plan target average of 800 homes per year would already produce an over- supply and this needs to be considered in assessing future needs.

In addition, the Housing Needs Assessment of 2021 puts forward a baseline target, which cannot be justified in terms of ONS data and predictions. If the emerging Local Plan uses the current HNA as its basis for housing targets it will set housing targets which will be undeliverable in terms of market demand.

Data from HNA 2021 and ONS			
Population of the Canterbury District 2019 was 165400 according to the HNA but was only 157400 in 2021 according the ONS Census data 2021????			
Population increase to 2040	Population increase pa to 2040 (8%)	CCC Base line housing number needed pa to 2040	Therefore occpanty rate of new housing
12,817	641	806	0.78 persons/dwelling
Add adjsrsted housing needs			
Population increase to 2024	Population increase pa to 2042 8%	CCC Uncapped housing need calculated pa to 2040	Therefore occpanty rate of new housing
12,817	641	1168	0.54 persons/dwelling

The pursuit of unrealistic targets and a surplus of allocated sites would result in:

- High levels of unoccupancy- avoided only by many developers delaying development.
  - Excessive land-banking by developers.
- Loss of control of the pattern of development as development will be scattered, driven by immediate financial favourability rather than the need to plan for sustainable and coherent urban and rural structure.

## **CA/23/01742**

These comments on the Land north of Popes Lane are not to be taken as being in favour of development on this site. In addition to the planning background set out above we argue that, despite the Inspectors comments on the appeal on CA18/03105 it should not be considered that the use of the best and versatile agricultural land, the extension of Sturry village towards Broad Oak and the impact on landscape are acceptable. It is hoped that the draft Local Plan will incorporate such policies as makes this clear and that this site will be withdrawn as land allocated for housing development. The parish council will respond accordingly to consultation on the Canterbury Draft Local Plan.

Should the city Council be minded to grant this application for outline permission then the following provisions and changes will help to ensure that some aspects of the sustainability of the development are improved and some shortfalls in community provision both within these proposals and in the parish as a whole are addressed.

### **Highways**

Note that the base plan for the Development Framework Plan, Drg. No. CSA/3609/124 Rev E is out of date and does not show the correct alignment of the A291 between its junctions with Sweechgate and Deansway Avenue. Discussions between Gladman developments Ltd. and KCC Highways concerning the re-alignment of the footpath CB59 need to take this into account. Also, note that the deliverability of the promised cycle route (bridleway) along the whole of this route is not within the developer's gift.

The development of the site is dependent on the completion of the Sturry Link Road. The appeal inspector for CA/18/03105 considered that this would sufficiently alleviate the unacceptable strain on the highway as a result of development on this site. KCC have asked for more traffic modelling to be done for this application. Can KCC please make sure that the impact of the Link Road on traffic through the housing estate (between the A28 and Popes Lane/Deansway is considered in this modelling.

At the moment traffic to Canterbury from south of the estate Link Road goes via Sleigh Road and Homewood Road. This involves a right hand turn onto the A28 which is difficult at times. The new housing development at Hersden will significantly increase the traffic along the A28 at this point. The proposed new Link Road bypasses the railway crossing and will increase the speed and decrease the gaps in traffic currently caused by the rail crossing. Observations are that at 5 to 10mph cars will often stop to let people out onto the road but at 30mph they do not. The difficulty of access onto the A28 from the estate will significantly increase.

An easier route from the south of the estate will be northward and onto the Link Road via the Herne Bay Road, and through Deansway and Popes Lane – thus increasing traffic along Popes Lane. The Planning Inspector appears not to have had this information when he decided that the Link Road would sufficiently mitigate against additional traffic from the proposed development. In some ways it will make matters worse.

## Sustainable urban Drainage Scheme (SUDS)

One plan in the Design and Access Statement (p38) has an area alongside Popes Lane labelled as SUDS. Will Gladman please confirm that this is a mistake.

It's good to see that the SUDS has been consolidated into a single large location and that after deducting this area there is still a sufficient amount of public open space. One issue will be that SUDS location is on the steepest part of the site, but the plans give the impression that it is on level ground. In fact, considerable excavation will be needed along the southern edge of this scheme to provide enough retention volume. We need to see N-S cross sections of the fully modelled scheme to check that the extent and steepness of the slopes are acceptable so close to dwellings.

## Environmental

a.

### Nutrient Neutrality

Given the situation at Stodmarsh Lakes, whereby additional nutrient loading to designated sites that are already in an unfavourable conservation status (as Stodmarsh is) is not permitted unless further mitigation is in place, we note that this development has planned an on-site sewage treatment plant, rather than discharge into the local sewage system.

The proposed plant will need detailed review as the reduction in nutrient load through the plant may not be sufficient to provide full mitigation.

We note there is a 'Consultee Comment' from Southern Water regarding the Proposal, which ideally should have indicated that the nutrient loading mitigation measures are adequate and proportionate. Unfortunately, the submission from Southern Water is a generic template and provides no assurance, and unambiguous approval cannot be implied from this document.

Further, detailed analysis is required before this proposal can be considered acceptable from a Nutrient Neutrality point of view.

b.

### Biodiversity

In October 2023, Canterbury City Council unanimously voted to declare a Biodiversity Emergency, but it is unclear how this will translate through to the planning process and whether it will strengthen the existing requirements of the Adopted Local Plan, which states that *"All development should avoid a net loss of biodiversity/nature conservation value and actively pursue opportunities to achieve a net gain, particularly where:*

We note that there is a Biodiversity Report which attempts to demonstrate a Biodiversity Net Gain (BNG), i.e. where the 'development leaves biodiversity in a better state than before. This BNG report proposes a BNG of 58% will be achieved in area units.

It is noted that the response from the KCC Ecological Advice Service states *"...We require a copy of the metric to be submitted in order to review the assessment and confirm that the trading rules have been met, as stated within the report..."* which

suggests that a further, detailed assessment is required before a net impact can be assured.

c. Traffic/Air Quality

Because there are fewer than 500 additional Annual Average Daily Traffic (AADT), i.e. trips, generated by this development outside of an Air Quality Management Area, then there is no requirement for a detailed assessment of road traffic impacts at existing locations and it has been concluded that the proposal will not have a significant impact on local roadside air quality.

However, this development does not exist in isolation, and it is unreasonable not to consider the cumulative effect of all other developments occurring in the area (i.e. Sturry, Broad Oak and the Relief Road) given that these are in the delivery or planning phase, and we call for a detailed air quality assessment to assess the overall cumulative impact on air quality of the combined effect of each of development.

d. Utilities

The Utilities report states, in relation to water supply, that *"It is anticipated this existing water network could be extended to feed the proposed development. A new mains infrastructure would be laid on site to serve the new domestic properties"*.

It is noted that Southeastern Water have not been consulted on this proposal and therefore the above statement has not been challenged. We are aware of low-pressure problems in the area with water supply and we require confirmation from Southeastern Water that the existing infrastructure will be able to cope with this development.

## Amenities

It is noted that the NHS consultee response states that the development will generate approximately 288 new patient registrations in general practice, which will increase demand on existing healthcare services provided to the local population.

Their response states *"There is currently limited capacity within existing healthcare premises to accommodate growth in this area. The need from this development, along with other new developments, will therefore need to be met through the creation of additional capacity in general practice and other healthcare premises."*

The proposal does not state how this additional capacity will be achieved. Previous developments at Sturry and Broad Oak (in the development and delivery stages respectively) will have had a significant impact on the current demand and the Popes Land development cannot be supported without a detailed plan on how this additional healthcare capacity can be delivered.

The Parish Council feel that the shortfalls in community provisions for the Parish e.g. Post Office, Dentist, Schools, and Doctors should be addressed prior to any more developments are considered.