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11 February 2022

Dear Joanna,

Re: Land north and south of New Dover Road, Canterbury, extending north to Canterbury-Dover railway line, west to Nackington Road and south to A2 ('Mountfield Park' – South Canterbury) (Application Reference: CA/16/00600)

Thank you for consulting Kent County Council (KCC) on the hybrid planning application for the urban extension up to 4,000 dwellings comprising, in summary:

- A full application for 140 dwellings, with vehicular, cycle and pedestrian access via New Dover Road, internal vehicular, cycle and pedestrian routes, drainage and utilities infrastructure and public open space.
- An outline application with all matters reserved except access (excluding internal circulation) for up to 3,860 additional dwellings, including two primary schools, a Community Hub, an additional Local Centre, land reserved for the potential relocation of the Kent and Canterbury Hospital, a Park and Ride facility, public open space and associated access and infrastructure.

KCC notes that an application was originally submitted in March 2016 to which the County Council provided comments on 20 May 2016, and recognises that after a subsequent legal challenge, it is now necessary for the City Council to determine the application again and the new documentation and changes to the proposal.

The County Council has reviewed the application documents and sets out its comments below:

Highways and Transportation

The County Council, as Local Highway Authority, has reviewed the main changes proposed to the application which are set out within the updated RGP Transport Statement, the updated Parameter Plan, the Design and Access Statement and point iii of the submitted "Guide to the Planning Application" which relates to travel, transport and highways.

RGP Updated Transport Statement

The Transport Statement discusses six areas in line with national guidance and local advice. These are:

1. Updates to Policy
2. Updated Accident Review
3. Updated baseline Traffic Surveys & Updated Construction Programme
4. Travel pattern changes
5. Infrastructure delivery

Updates to Policy

KCC notes that the applicant has identified the relevant updates to policy, which required a review of the Design and Access Statement (relating to paragraph 110 of the [National Planning Policy Framework](#) (NPPF) which discusses the National Design Guide) and updated local parking standards. A review of the Phase 1a application has also been undertaken to determine whether any amendments are required as a consequence to policy amendments.

The updated Design and Access Statement has included appropriate references to the updated NPPF; however, it does not address electric charging facilities (paragraph 87). This should be addressed. Furthermore, there are new KCC parking standards being implemented as a part of the revised Kent Design Guide which require one active charger per dwelling with on-plot parking and 10% active chargers for communal residential areas. Non-residential developments are required to have 10% active and 100% passive EV parking provision. The new parking standards will be issued to the applicant directly so that they can be applied to this proposal.

Action 1: KCC advises that Section 7 of the Design and Access Statement is updated to reflect the policy changes, along with an updated proposed parking plan for the Phase 1a submission.

The Design and Access Statement has been updated on numerous occasions that makes it particularly difficult to assess. It would be helpful if the applicant could submit a fully updated Design and Access Statement, taking into account the required amendments.

Updated Accident Review

KCC notes that there has been a significant increase in the number of incidents between the 2008-15 and 2015-21 reviews, from 44 to 59 reported cases in the New Dover Road (urban) area. Moreover, two fatalities were recorded which both involved pedestrians crossing the A257 St George's Place. KCC recognises that the application makes general improvements to the provision of sustainable access to the City Centre and would welcome engagement with the applicant to also deliver significant movements across the junction.

Action 2: KCC, as Local Highway Authority, requests that the previously proposed mitigation for this junction is reviewed with the County Council, with the purpose of addressing matters arising from the Personal Injury Accident (PIA) reports.

It is noted that the Old Dover Road area has experienced an increased incident rate from 43 reported cases in the 2008-15 review to 53 reported cases in the 2015-21 review. Although a summary of the incidents is not provided in the applicant's submission, KCC's own review would indicate no clear causal factor, however, there are some incidents relating to right turn movements.

The number of incidents in the Spring Lane/Pilgrims Way area has remained similar since last being reviewed, although, there is an acknowledged increase in severity. KCC considers that the mitigation put forward to reduce the speeds in this area remains appropriate and proportionate, however, there is concern over the number of dwellings which are proposed to have direct access to this area. It is noted that the area has a high volume of vulnerable users due to the extent of education land use in the area, important cycle routes and the North Downs Way National Trail. The value and protection of these assets is therefore increasingly important to the application and its reliance on modal shift to mitigate traffic and air quality concerns. Furthermore, the Design and Access Statement mentions an approximate number of 100 dwellings requiring access via Pilgrims Way. However, the previous consent did not restrict the number of dwellings that have direct access on to Pilgrims Way and due to the likely increased value in this route for non motorised access to the development, KCC considers that there should be a condition imposed to address this (i.e. limit the number of houses with direct access on to that road). KCC advises that the vehicular trip generation in this area would be in direct conflict with the aim of enhancing the North Downs Way or providing a sustainable access route to the City Centre from the development and protecting those vulnerable users.

Action 3: To protect an increasing number of vulnerable users in the area, KCC, as Local Highway Authority, would request discussion with the Local Planning Authority and the applicant on options to incorporate land uses which would generate less movements at peak hours (for instance, care homes, supported living accommodation and open space). It is further recommended that a condition is imposed that restricts the number of dwellings accessing off Pilgrims Way in order to minimise the inevitable conflict.

The County Council recognises that all other areas requested to be reviewed have either maintained a consistent level or reduced level of incidents since last being assessed and therefore has no further comment on those areas.

Updated baseline Traffic Surveys & Updated Construction Programme

It is understood that traffic survey opportunities have been significantly constrained, predominantly due to the COVID-19 pandemic. Notwithstanding this, it was accepted that a traffic survey in early October 2021 (outside the school holiday half term and after the main impacts of the 2021 fuel shortage) provides a valid indicative sensitivity test against previous surveys undertaken for the application.

KCC recognises that overall traffic on the A2 has shown significant peak hour reductions and this is reflective of the county wide picture since the pandemic struck.

Local traffic is lower than predicted for 2021 in most areas, however, there is a slight increase in expected flows in the ring road area - a squared zone including the four main junctions of the Riding Gate and St Georges roundabouts, the St Georges traffic lights and the Nunnery Fields/Old Dover Road (cross keys) traffic lights. The increased traffic is explained in paragraph 8.4.5 in the Transport Statement as being on the New Dover Road (south of St Georges) and on the Old Dover Road (south of Nunnery Fields). As a consequence, the applicant has remodelled those junctions using updated traffic flows accounting for the unexpected increase in base growth. The technical note summarises that the flow changes result in a negligible residual impact of an increased seven second delay on St Georges Place.

Action 4: KCC, as Local Highway Authority, requires that the newly assumed base 2021 flows will be included in appendix N. KCC would also request that the original 2016 base flows and development trip generation flows are presented for comparisons. There are also some anomalies that would require further explanation as fewer movements through these junctions are shown in the updated traffic flow diagrams in comparison to those shown in the original application.

Action 5: Further to the above point, KCC requests that consideration is given to recently committed developments and if necessary, these are included in the junction modelling. These largely relate to educational expansions that would not necessarily be picked up accurately in the TEMPRO adjustments and are as follows:

- Former Chaucer College – KCC/CA/0166/2019
- Simon Langton expansion – KCC/CA/089/2021
- 5-5A Rhodaus Town – 21/01353

Action 6: The County Council would welcome further discussion with the applicant to review the newly modelled four junctions which may result in necessary amendments to the previously proposed mitigation in this area.

KCC is supportive of the junction assessments that have been updated to account for the delays of this application, with the forecast year of opening now 2037-2038, as opposed to 2031 in the original application.

It would be expected that the increased 2021 flows on the New Dover Road and Old Dover Road would also have an impact on the performance of the St Lawrence Road and St Ethelbert Road junctions which were originally assessed in the 2016 Transport Assessment (TA). KCC notes that in the case of the St Lawrence Road, the original TA identified the exit into New Dover Road as being over capacity with a significant impact being attributed to the development. Although it is acknowledged that there is expected to be a degree of the gaps created following implementation of the bus priority scheme further to the south, it is clear that the junction is at a sensitive level of capacity. In the case of the St Ethelbert and St Lawrence junctions on the Old Dover Road, KCC is satisfied that the level of increase following the 2021 counts would not be unduly detrimental to require additional evidence.

Action 7: KCC, as Local Highway Authority, would require that a re-assessment of the capacity and performance of the St Lawrence/New Dover Road junction is undertaken due to the increased traffic flows on the New Dover Road and Old Dover Road.

Travel Pattern Changes

The County Council has concerns in respect of the traffic pattern changes due to the impacts of the pandemic and KCC is therefore pleased to note that the bus patronage for school children is broadly similar to that pre-pandemic within the application.

KCC recognises that other positive and negative changes remain to travel patterns relating to post pandemic travel. It is noted that the traffic surveys take into account a wider drop in public transport usage and subsequent increase in other modes, as well as reduced traffic through increased working from home and/or avoidance of peak hours.

Infrastructure Delivery

KCC notes that the applicant is seeking a variation to the methodology associated with infrastructure delivery triggers, as explained in both the Transport Statement and "Guide to the Planning Application" dated December 2021. The applicant is seeking a Monitor and Manage approach, as opposed to the previously agreed Predict and Provide methodology. The applicant's reasoning and justification for a more flexible approach is intended to respond to the City Council's position on a Climate Emergency, whereby the sustainable transport triggers would remain as previously agreed. However, some of the more vehicular based mitigation is reviewed using an independent Transport Review Group (TRG) and a continual monitoring mechanism to check whether vehicular trip generation is greater or lesser than predicted. Should the trip generation be less than predicted, the applicant would seek to amend the Transport Assessment and triggers for infrastructure delivery accordingly. The TRG is proposed to be formed of representatives from Corinthian Mountfield Limited, KCC, Canterbury City Council and National Highways.

Paragraph 10.2.2 of the Transport Statement confirms that the applicant is not proposing to change the trigger points for the sustainable travel measures and infrastructure between the site and the City Centre, or those with a trigger point of less than 500 occupations, as there would be insufficient time to allow for monitoring to take place.

KCC would draw attention to Figure 10.1 and 10.2 within the Transport Statement to demonstrate the current agreed trigger points for highway mitigation which are shown below:

Phase 1 Infrastructure	Trigger Point (units)
Bus priority scheme along New Dover Road between The Gate Roundabout and St Lawrence Road (C14)	300
Pedestrian/cycle improvements along New Dover Road service road	50
Cycle lane improvements along New Dover Road	50
Localised cycle/pedestrian improvements along Pilgrims Way, St Augustines Road and the North Downs Way, as required from Mountfield Park to Canterbury City Centre (B12)	50
New North-west Signalised Junction onto New Dover Road (serving Phase 1A)	1
Traffic Lights implemented on Bekesbourne Road at the A2 off-slip junction (temporary measure implemented prior to occupation of 100 units)	100
Implement improvements to City Centre junction 6 through changes to staging of traffic signals and banned right turn movement from St George's Place to Upper Chantry Lane (F2) to improve bus reliability.	500
New A2 junction eastbound off-slip, link road and link road roundabouts (F11) (anticipated to be implemented prior to occupation of 1000 units)	1000
Capacity Improvements to Brenley Corner (Junction 7 of M2/A299 with A2)	1000

Figure 10.1 Phase 1 Trigger Points

Phase 2 Infrastructure	Trigger Point (units)
Provision of Fast-bus link across Mountfield Park west to Nackington Road (C4)	1600
New cycle/pedestrian route from Mountfield Park east to Bridge (B12)	1600
Cycle/pedestrian connection to Nackington Road (B14) and across to Langton Lane	1600
Works to create two-way cycle route within Dover Street	1600
Provision of cycle and pedestrian infrastructure improvements to existing route to city centre via Langton Lane, South Canterbury Road and Nunnery Fields (B14) including works for Bus priority on Nunnery Fields also	1600
Off-site Fast Bus Link (as per S106 Agreement)	1600
Construction of Public Space and Square and dualling of New Dover Road through site between A2 replacement junction and Gate Junction	1600
Provision of 1000 space Park & Ride (E3/E7)	1600
A2 westbound on and off-slips and new bridge, plus upgrades to eastbound on-slip (F11)	1600
Gate Roundabout converted to Traffic Signals (Only following relocation of Park & Ride - i.e. after 1600 units)	1800
Junction Improvements at Old Dover Road/Nunnery Fields/Oaten Hill signalised junction (Junction 9) for capacity and bus priority (C13)	1600
Junction Improvements at Old Dover Road junction with Ring Road (Riding Gate Roundabout - Junction 8)	1600
Capacity improvements at Old Dover Road/St Lawrence Road/The Drive/Nackington Road signalised junctions	1600
Implement improvements to City Centre junction 7 in the form of geometric improvements to St George's Place approach	1600

Figure 10.2 Phase 2 Trigger Points

The Monitor and Manage approach is proposed to be limited to the permanent A2 junction improvements and associated link roads, roundabouts, works to the A2050 New Dover Road and cycle and pedestrian links to Bridge.

Monitoring of the trip generation would be collected on an annual basis from the point at which the development reaches 600 occupations. These surveys are proposed to be an addition to the modal split surveys being completed as part of the wider Travel Plan monitoring. KCC notes that three key parameters for survey work are identified, these being:

- i. Trips generated from the development
- ii. Background traffic in and around an A2 cordon shown in Figure 10.3 of the Transport Statement
- iii. Accident records for the above mentioned cordon

Action 8: KCC would welcome further engagement with the applicant on the proposed “Monitor and Manage” approach in order to have a greater understanding of how flexible the approach is intended to be, how the monitoring would be undertaken, the requirement for our ongoing involvement and the decision making process. As a response to the Climate Emergency, KCC recommends that the new approach should also add in flexibility for earlier provision of the sustainable travel mitigating schemes. Furthermore, the proposed cordon area shown for monitoring does not cover a sufficient area and would need to extend towards the City, with the development mitigating its full impact. It is noted that the ultimate control of agreement to changes must be at the determination of the Local Highway and Planning Authorities.

Action 9: KCC would welcome further discussion with the applicant regarding the interaction between this application and the City Council’s emerging Local Plan and in particular the proposed Movement Parameter Plan, as this will be critical to the protection of future growth options.

Summary

There are a number of issues and additional information requirements of the Local Highway Authority before it is able to make any recommendation. The County Council, as Local Highway Authority, would therefore request the application is not determined until further discussion and evidence is provided to support the application, and KCC has been able to respond accordingly.

Public Rights of Way (PRoW)

The County Council notes that Public Footpaths CB345 and CB346, and Public Bridleways CC46 (The North Downs Way) and CC47, would be directly affected by the proposed development. The location of these paths is indicated on extracts of the Network Map (Appendix 1 and 2). It should be noted that the Network Map is a working copy of the Definitive Map and the existence of the PRoW is a material consideration.

It would appear from this application that there are no amendments to the incorporation of the PRoW network from the application originally submitted in 2016, and, as such, comments raised in the initial application in 2016 (Appendix 3), remain relevant.

However, due to the passage of time since the previous application and the increasing significance of Active Travel, KCC would request that a PRoW Management Scheme is provided as part of the application, to include each Public Right of Way affected and to cover pre-construction, construction and occupation of the development proposal. All details relating to the PRoW network will need to be approved by KCC prior to commencement of any works if permission is granted. The County Council would request this is secured via

condition in the event planning permission is granted. KCC would also request engagement with the applicant to ensure better clarity of the project going forward.

Impact on the wider network

KCC requests details of the strategy regarding off-site connectivity. Details of how the PRow will exit the site, giving permeability throughout the area and onward to transport and existing community facilities should be addressed. This is to ensure the opportunities which the network can provide through positive incorporation and early planning are not missed. The County Council considers that a financial contribution, in the form of Section 106 Agreement funding, will be sought to mitigate the loss of amenity, increased use and subsequent improvements that will be required in the wider PRow network as the area is developed. Public Rights of Way CC48, CC49, CC62, CC55 and CC63 all provide connectivity into Canterbury centre and west towards other development sites and network investment. The County Council is likely to request a contribution of no less than £80,000 towards PRow surface improvements and clearance. These improvements would also assist in the future proofing of sustainable Active Travel Opportunities across the wider area of the district.

General Comments

Users of the PRow network are likely to be severely affected by impacts generated by the development, both during construction and following occupation of the proposal. These impacts are likely to include air quality, noise pollution and landscape and visual amenity impacts which need appropriate acknowledgement and therefore mitigation.

Active Travel access is essential from the outset of any work commencing on the proposed development to enable both new and existing users to access amenities both within and off site (schools and community facilities). There can be no disruption or potential danger to public use of the PRow network. Any delay to the upgrading and/or construction of PRow, cycle routes and other related works to the PRow networks would only increase the already significant impact on new and existing residents. There must be a commitment to Active Travel, connectivity of developments, sustainable transport, and the protection and enhancement of the local area rural character.

In consideration of Kent Design standards, any master plan should keep PRow within overlooked areas of open space, to facilitate a safer environment for path users. Path extinguishments and long-term severance of routes should also be avoided, to prevent fragmentation of the PRow network.

Provision and Delivery of County Council Community Services and Infrastructure

The County Council has assessed the implications of this proposal in terms of the delivery of its community services and notes that it will have an additional impact on the delivery of its services which will require mitigation either through the direct provision of infrastructure or the payment of an appropriate financial contribution.

The Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) require that requests for development contributions of various kinds must comply with three specific legal tests:

1. Necessary,
2. Related to the development, and
3. Reasonably related in scale and kind

These tests have been duly applied in the context of this planning application and give rise to the following specific requirements. The full response in respect of the implications on KCC community services and infrastructure is also in Appendices 4-4e.

The County Council was last consulted with regard to section 106 contributions for education and community services in April 2019. Since then, a number of changes have been made to the way in which KCC seeks amounts for infrastructure. As such, in order to ensure that this development mitigates fully the cost of providing infrastructure to meet the needs of the new population, KCC must consider this application at this point in time to reflect current costs and service provision.

Request Summary

	Per Applicable House	Per applicable flat	Total* (assumes 100% Houses)	Project
	4000	0		
Primary Education	£6,800.00	£1,700.00	£27,200,000.00	Towards provision of additional education places at two new 2FE primary schools on site and/or within the Planning Group and neighbouring Planning Groups.
Primary Land	Provision of two primary school sites of 2.05Ha each transferred to the County Council at nil cost, according to KCC's General Transfer Terms (attached).			
Special Educational Needs and Disability (SEND)	£1,334.61	£334.65	£5,338,440.00	Contribution towards new special school satellite provision and specialist resource provision to support SEN pupil inclusion in mainstream within the district.

* These figures are subject to review and are currently index linked by the BCIS General Building Cost Index from April 2020 to the date of payment (April 20 Index 360.3). They are valid for 3 months from the date of this letter after which recalculation may be required due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs. Bonds will be required by KCC for the Education contributions if the applicant wishes to pay the contribution in instalments. If the contributions are paid in instalments, the applicant will also be required to cover KCC's borrowing costs for the construction of the schools.

Secondary Education	£4,540.00	£1,135.00	£18,160,000.00	Towards the provision of new secondary places at the new Barton Manor Secondary School, new secondary school on the coast and/or within the Planning Group.
*Total contributions for education provision (above) represent the maximum request based on all dwellings being houses. Once the housing mix is known, this will be recalculated accordingly.				
'Applicable' excludes: One bed units of less than 56 sqm GIA, and any sheltered/extra care accommodation.				
	Per Dwelling (4000)	Total		Project
Community Building Specification:	<p>*Design that is dementia friendly with dementia friendly decoration and signage.</p> <p>*A catering area which is compliant with the Equality Duty 2010, such as adjustable height work surfaces, wash areas, cupboards etc.</p> <p>*Toilets and changing facilities for the profoundly disabled which are Equality Duty 2010 Compliant and delivered in accordance with Changing Places Toilets.</p> <p>*Provision of secure storage for KCC social care, community learning, libraries and youth service.</p>			
Community Learning	£16.42	£65,680.00	Free use of new community facilities on-site for meetings, group, and therapy sessions, plus provision of secure storage for equipment.	Towards additional resources (including portable teaching and mobile IT equipment), and additional sessions and venues for the delivery of additional adult education courses locally.
Youth Service	£65.50	£262,000.00	Free use of new community facilities on-site for meetings, group, and therapy sessions, plus provision of secure storage for equipment.	Towards additional resources and equipment to enable outreach services in the vicinity of the development.
Library Service	£55.45	£221,800.00	Free use of new community facilities on-site for meetings, group, and therapy sessions, plus provision of secure storage for equipment.	Towards additional library equipment, stock, services including digital infrastructure, shelving and resources for the new borrowers at libraries in the Canterbury Urban Area.

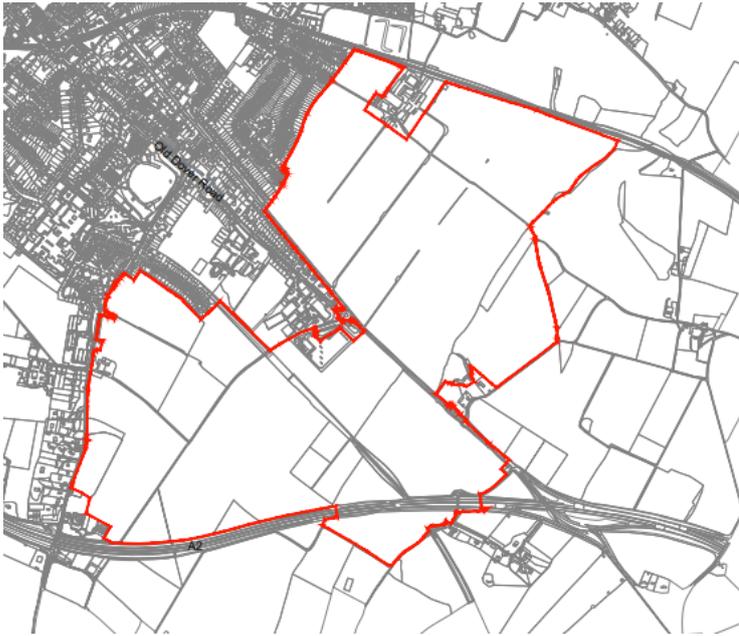
Social Care	£146.88	£587,520.00	Free use of new community facilities on-site for meetings, group, and therapy sessions, plus provision of secure storage for equipment.	Towards specialist care accommodation, assistive technology systems and equipment to adapt homes, adapting community facilities, sensory facilities, and Changing Places within the district.
	All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2)			
Waste	54.47	£217,880.00		Towards provision of increased Household Waste Recycling Centre capacity to meet the needs of the development.
Broadband:	Condition: Before development commences details shall be submitted for the installation of fixed telecommunication infrastructure and High-Speed Fibre Optic (minimal internal speed of 1000mbps) connections to multi point destinations and all buildings including residential, commercial and community. The infrastructure installed in accordance with the approved details during the construction of the development, capable of connection to commercial broadband providers and maintained in accordance with approved details.			
	Reason: To provide high quality digital infrastructure in new developments as required by paragraph 114 NPPF.			

Minerals and Waste

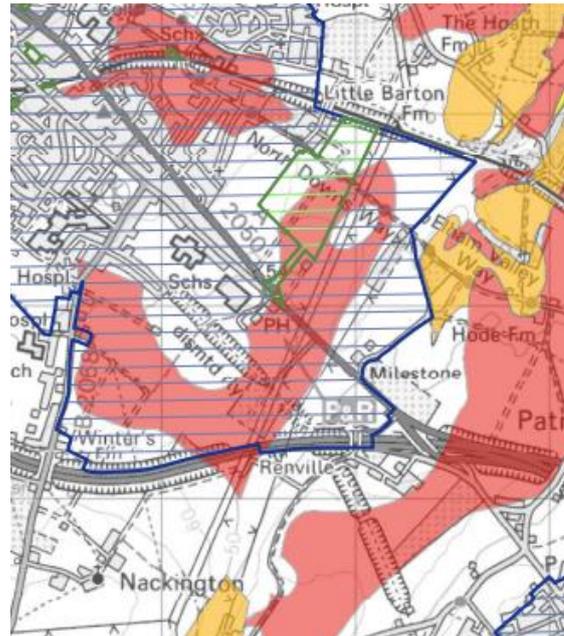
The County Council, as Minerals and Waste Planning Authority, can confirm the presence of economic mineral deposits at the site which are vulnerable to sterilisation as a result of the proposed scheme. The applicant must be made aware that prior extraction of such mineral deposits should be investigated as part of the application process. KCC therefore requests that a Minerals Assessment is prepared to determine the extent and nature of mineral deposits and to assess the viability and practicality of prior extraction regarding the non-mineral development. The County Council would also welcome further engagement with the City Council and the applicant to ensure that the sustainability of mineral safeguarding and supply are maintained in Kent.

However, it is noted that when comparing the application area to the Mineral Safeguarding Area of the adopted [Kent Minerals and Waste Local Plan 2013-30](#) Proposals Map for the Canterbury City Council area, it is evident that the vast proportion of the application area is within the defined urban area of Canterbury, and is therefore exempt from land-won mineral safeguarding.

Application Area



Mineral Safeguarding Area



KCC notes that the safeguarded land-won minerals immediately adjacent to the site include the River Terrace Deposits (orange) sand and gravels. These are in isolated units set amongst the mineral Brickearth (Other Areas) that is generally considered of limited to no economic viability. Therefore, these safeguarded mineral deposits that are immediately adjacent are unlikely to be of any economic viability. KCC would request that mineral safeguarding is addressed within the application in line with the adopted Kent Minerals and Waste Local Plan.

Sustainable Urban Drainage Systems

KCC, as Lead Local Flood Authority, would like to draw attention to the County Council's response to the initial application in 2016 (Appendix 3) and provide additional comments. Whilst KCC acknowledges that the detailed approval is only being sought for 140 dwellings, with outline approval being sought for a further 3860 dwellings (with all matters other than access being reserved for consideration at a later date), the principles of the site-wide drainage infrastructure should still be considered and established from the outset. KCC, as Lead Local Flood Authority, is therefore pleased to note that a preliminary surface water management strategy has been provided to demonstrate how the surface water generated by these substantial proposals can be accommodated.

As Lead Local Flood Authority, KCC will be seeking to ensure that the post-development flood risk is not exacerbated, and that the surface water management system devised for this development mimics the drainage from the pre-developed site as far as reasonably practicable.

KCC is supportive of the applicant allocating sufficient space within the site's boundary to accommodate appropriate sustainable drainage features to manage the runoff from the development proposed. Although the Drainage Strategy is not included, based on the previous submission which assumes that infiltration will not be available across the site (with

all surface water runoff attenuated and discharged at a controlled rate to off-site watercourses), KCC is aware of the applicant's intent to utilise infiltration wherever ground conditions permit. Wherever infiltration proves to be viable, the rate/volume of off-site discharge will be lower than presently suggested, with a corresponding reduction in the requirement for attenuation.

The quantity of attenuation currently presented is therefore likely to be somewhat higher than will actually be required at the final, detailed design stage. However, KCC recognises that there will be sufficient space for appropriate drainage features, irrespective of the actual underlying ground conditions.

Although KCC would have ordinarily recommended that site-specific infiltration testing is undertaken before the formulation of such a strategy, the British Geological Survey (BGS) information available suggests that the underlying geology will be sufficiently permeable for the use of infiltration across large parts of the site.

At the detailed design stage KCC, as Lead Local Flood Authority, would request a detailed surface water management strategy that:

- Has been designed to accommodate all rainfall durations and intensities for any event up to (and including) the climate-change adjusted critical 100yr storm.
- Takes account of the Environment Agency's latest climate change guidance.
- Is based on the use of 'open' SuDS features (swales, infiltration ponds, reed-beds, etc.) rather than through the use of subterranean geocellular crates. Such open features not only visually enhance a development site, however, they are also often cheaper to construct and maintain, provide added amenity and ecological value and can be more easily used to accommodate exceedance flows.
- Avoids or minimises the use of pumping.
- Maximises the use of infiltration.
- Considers the flow routing and accommodation of any rainfall event that may exceed the design parameters.
- Considers the drainage from the access road and internal highway and the requirements of the adopting authority.
- Considers the drainage from the undeveloped areas of the site. Any existing overland flow routes should be identified and avoided/mitigated.
- Takes full account of the implications of the phasing of the development to ensure the necessary infrastructure is in place and functional before the commencement of construction of any contributing impermeable area.
- With multi-phase developments or developments delivered over a period of time, it is beneficial to have a clear setting out of phases and contributions of impermeable areas, any attenuated volumes and discharge rates for each specific phase or plot.
- Phased drawings to be included to state contributions from all phases and tabulated so that it is straight forward for checking as phases are submitted/approved within the planning process.

KCC would also expect any attenuation feature to be designed with a half-drain time of less than 24 hours to ensure that any subsequent storm events can be adequately accommodated, irrespective of the means of discharge.

At the detailed design stage, the County Council would request the applicant to demonstrate that the ongoing maintenance has been fully considered and that the formal agreement of any adopting authority has been obtained.

Heritage Conservation

The County Council recognises that this is a significant development proposal which has the potential to affect a large range of heritage assets, including high-grade designated heritage assets. The City Council should seek expert advice from their in-house advisors and relevant external bodies to ensure that they adequately understand the impact of the scheme on heritage significance. KCC advises, as a minimum, that the City Council should seek advice from their in-house archaeological advisor and conservation officer, as well as Historic England, ICOMOS (International Council on Monuments and Sites) and the Canterbury World Heritage Site Co-ordinating Committee.

KCC notes that the baseline studies and Environmental Statement (ES) for heritage remain unchanged since 2016/19. It is possible that additional archaeological knowledge may now be available and relevant changes to planning policy should also be considered. KCC would suggest the existing ES Cultural Heritage chapter and accompanying baseline studies are subject to a “health check” and if necessary, an update/addendum should be prepared.

The 2016 Environmental Statement includes mitigation recommendations in respect of buried archaeology (section 10.6) and the planning application was accompanied a Written Scheme of Investigation (WSI) for archaeological mitigation that was prepared by CgMs and dated October 2016. KCC recommends that the WSI should be reviewed to take account of any changes (either to understanding or to the development parameters) and updated where necessary. The 2016 ES suggests that archaeological mitigation works can be secured using a suitably worded condition attached to any forthcoming planning consent. Canterbury City Council’s archaeological advisor would be most suitable to advise on the precise wording of such a planning condition or suite of conditions.

KCC suggests that any archaeological programme should include further field evaluation works (trial trenching) across the development area, including within areas suggested as being ‘negative’ on the geophysical survey. Following on from this, KCC would expect appropriate measures to put in place to secure the preservation in situ of important archaeological remains, as well as measures to record and advance understanding of any archaeological remains to be lost.

The scale of the development means that such archaeological investigation and mitigation measures could result in the production of a sizeable archaeological archive, including paper records, finds and environmental evidence. It is advised that the City Council should consider including measures, either through condition or legal agreement, to contribute towards the long-term storage and maintenance of the archaeological archive.

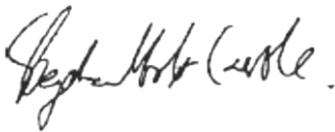
KCC recommends that any archaeological works undertaken for the proposed development are used to deliver public benefit. Such public benefit can take many forms, including through community participation in archaeological work, by means of on-going communication and outreach, through dissemination of archaeological results and from on-site interpretation. The City Council should ensure that any archaeological works include a commitment to deliver meaningful public benefit and again this could be secured by condition or legal agreement. It is also advised that the archaeological WSI is updated to include specific reference to the delivery of public benefit.

Biodiversity

KCC has provided ecological advice directly to Canterbury City Council, dated 21 January 2022 (Appendix 5).

The County Council will continue to work closely with the City Council to help to ensure the delivery of new housing and infrastructure in response to local needs. In addition, further engagement with the City Council and the applicant as the development proposal advances would be welcomed.

Yours sincerely,



Stephanie Holt-Castle

Director – Growth and Communities

Encs:

Appendix 1: Network Map

Appendix 2: Network Map

Appendix 3: KCC Response to South Canterbury 20.05.16

Appendix 4: Request Letter

Appendix 4a: Education Assessment

Appendix 4b: Communities Assessment

Appendix 4c: Social Care Assessment

Appendix 4d: Waste Assessment

Appendix 4e: KCC General Land Transfer Terms July 2020

Appendix 5: KCC Ecological Advice 21.01.22