



Mr B. Young
Planning and Regeneration
Canterbury City Council
Council Offices
Military Road
Canterbury
Kent CT1 1YW

BY EMAIL ONLY

Growth, Environment & Transport

Room 1.62
Sessions House
MAIDSTONE
Kent ME14 1XQ

Phone: 03000 415981
Ask for: Barbara Cooper
Email: Barbara.Cooper@kent.gov.uk

20 May 2016

Dear Ben,

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 inviting Kent County Council (KCC) to comment on the hybrid application received for the proposed South Canterbury urban extension for up to 4,000 dwellings comprising the following:

- Detailed proposals for 140 dwellings with access via New Dover Road, internal access and public open space.
- Outline application 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.

The County Council has actively co-operated with the City Council throughout the preparation of its emerging District Local Plan (June 2014) and the identification of associated infrastructure requirements. KCC wishes to reiterate its position, as set out in its response to the Draft Local Plan (June 2014) dated 18 July 2014, regarding the phasing and timely delivery of full infrastructure necessary, through appropriately worded, robust legal agreements and/or the Community Infrastructure Levy, to support the development ambitions of the Plan. In addition, the County Council would like to emphasise the importance of ensuring that the Local Plan is viable in its entirety.

KCC recognises that the proposed development ('land at South Canterbury') is allocated under policy SP3: Strategic Site Allocations in the City Council's emerging District Local Plan (June 2014). Policy SP3 anticipates that the proposed site will contribute towards the delivery of 4,000 dwellings, employment space, retail facilities, primary schools, a doctor's surgery, a local community 'hub', new open

space, the relocation of Kent and Canterbury Hospital, an extended Park and Ride facility and transport infrastructure.

The County Council welcomes the positive contribution of the proposed urban extension at South Canterbury subject to the comments set out below:

Highways and Transportation

KCC – as Local Highway Authority - currently raises concern regarding the information submitted with respect to the Transport Assessment; specifically junction modelling and the analysis of trip distributions. Additionally, the County Council recognises that trigger points for various infrastructure improvements have not been agreed with KCC Highways and Transportation. These issues may be possible to overcome if amendments regarding the Transport Assessment and Drawings, Travel Plan and the proposed site layout of Phase 1A, as recommended by the County Council, are made.

A full copy of KCC Highways and Transportation comments is appended to this letter.

The County Council would welcome the opportunity to further engage with the City Council and Corinthian Mountfield Ltd. to address the highways and transportation matters raised and in turn help to ensure the timely delivery and funding of necessary infrastructure required to support the proposed development.

Provision and Delivery and County Council Community Services

KCC has assessed the implications of this proposal in terms of the delivery of its Education and Community Services (i.e. Libraries, Youth, Community Learning and Social Care) and is of the opinion that the proposed development 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.

Primary Education

The proposed development is forecast to generate up to 980 primary pupils which cannot be accommodated within existing capacity in local schools. To facilitate the increased demand from the proposed development it will be essential that new provision is incorporated into the development. **Therefore, the County Council requests the provision of two primary schools; each providing up to 420 places (equivalent to 2 forms of entry).**

It is also requested that land of 2.05 hectares per primary school site is provided in in both northern and southern neighbourhoods and is **transferred at nil cost** to the County Council and in accordance with KCC's General Site Transfer Terms. The estimated cost of construction for each school is £6 million and development contributions to fully cover the **total construction cost of £12 million will be required. In order to ensure that KCC does not have to undertake forward funding or borrowing, it is recommended that payments be made to the County Council in line with the delivery of the two primary schools.**

Secondary Education

The proposed development is forecast to give rise to up to 700 additional secondary school pupils which cannot be accommodated within existing capacity in local schools. Therefore, the County Council will request a contribution of **£5,091.60 per house** and **£1,272.90 per flat** towards new secondary school provision on the former Chaucer site to create additional places in mitigation. Therefore, **a total contribution of £17.8 million will be required for secondary education provision.**

Community Services Requirements

The County Council has assessed the implications of the proposed development on its delivered community services and considers that the new community will generate significant demand. The forecast numbers of new clients are outlined in the table below:

Service	Additional Clients
Community Learning And Skills	298
Youth Service	156
Libraries	2,118
Clients With Learning Disabilities	11
Clients With Physical Disabilities	7

Given the location and scale of the proposed development, KCC will request that provision within the proposed community building is made for the onsite delivery of KCC's community services.

The KCC Community Services Area should be an area within the building capable of accommodating two teaching areas or rooms of 50 square meters (net internal area) with the following: access to kitchen facilities during hours of use, lockable storage areas, toilets and disabled changing facilities and access for those disabled or with impaired mobility. It will also be requested that a full specification be agreed with the County Council and included in the associated planning obligation

To enable the Community Services Area to operate effectively the County Council will request the following contributions as set out in the table below:

	Per Dwelling	Comment
Community Learning and Skills	£36.35	The development is forecast to produce an additional 298 clients and there is not surplus capacity within the service to accommodate these. The requested contribution will go towards equipping the Community Services Area with IT and other learning resources.
Youth Services	£16.11	An additional 156 clients is forecast to be generated by the proposal and the requested contribution will go towards equipment within the Community Services Area and to enable Youth Workers to conduct outreach work within the new community.
Library Bookstock	£49.00	The development has been assessed to produce an additional 2,118 borrowers. The requested contribution will be used towards the provision of additional bookstock and a library kiosk within the Community Services Area.
80 Wheelchair Adaptable Homes as part of the on-site affordable homes delivery.		

A copy of KCC's full assessment of the above is appended to this letter.

Minerals and Waste

As Local Minerals and Waste Planning Authority, the County Council can confirm the presence of economic mineral deposits at the site which are vulnerable to sterilisation as a result of the proposed scheme. Corinthian Mountfield Ltd. should be informed that prior extraction of such mineral deposits should be investigated as part of the application process. Therefore, a minerals assessment should be prepared to determine the extent and nature of mineral deposits 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 Corinthian Mountfield Ltd. to ensure that the sustainability of mineral safeguarding and supply are maintained in Kent.

Sustainable Urban Drainage

In its response dated 29 April 2016, KCC – as Lead Local Flood Authority – expressed concerns regarding the information submitted with respect to the proposed surface water management for the entire site and therefore recommended a holding objection until such information is submitted to inform an appropriate assessment. In addition, KCC also recommended the City Council consider the requirement for the preparation of a surface water drainage infrastructure parameter plan.

A full copy of KCC Flood Risk's response is appended to this letter.

Public Rights of Way (PRoW)

In seeking an agreement for the potential loss of views on the North Downs Way and loss of the Public Footpath CB346 and KCC requests that the following routes are provided as conditions to approval:

- that a new Public Bridleway is provided along the alignment of the Old Railway Line in accordance with community requests in delivering the County Councils Rights of Way Improvement Plan and NPF75. This should extend from the Renville Farm Road bridge to Public Bridleway CC47 and be constructed to a specification approved by KCC PRoW & Access Service;
- that a new Public Bridleway is provided heading North-South between CC46 and the Dover Road along the alignment of the NMU route shown on the attached plan. This should be constructed to a specification approved by KCC PRoW and Access Service;
- that the surfacing of Public Bridleways CC46 and CC47 and Public Footpath CB345 should be improved to an agreed specification of the Public Rights of Way Service;
- that the North Downs Way will not be closed at any point during development, other than for surfacing improvement works, at which time an alternative route must be provided; and
- that the design of the North Downs Way includes restrictions to vehicular access wherever possible and is approved by KCC PRoW and Access Service.

The County Council supports the proposed changes and layout for this area on the grounds that the above requested conditions and mitigations is secured.

A full copy of KCC PRow and Access Service's comments and a map setting out a requested dedicated route as mitigation is appended to this letter.

Heritage Conservation

The County Council welcomes the inclusion of Chapter 10: *Cultural Heritage* of the Environmental Statement accompanying the application and recognises that associated technical studies have identified that the proposed site has a very good potential for archaeology dating from Neolithic, Bronze Age, Iron Age and Roman periods. In addition, targeted evaluation works have demonstrated the presence of archaeology of Late Iron Age and Romano-British date.

With regard to section 10.6 of the Environmental Statement, KCC welcomes the inclusion of mitigation recommendations regarding buried archaeology and the proposal for a programme of archaeological investigation and mitigation works. Any archaeology programme should include further field-evaluation works (e.g. trial trenching) across the remaining development area, including within areas considered as 'negative' on the geophysical survey. Additionally, measures to secure preservation in situ of important archaeological remains and/or further archaeological investigation and recording are recommended. Therefore, it is recommended that the above programme is secured through the use of a suitably worded planning condition.

Given the nature and scale of the proposed development, such investigation and mitigation works could result in the production of a sizable archaeological archive. KCC advises that consideration is given to including measures, either through a condition or legal agreement, to contribute towards the long-term storage and maintenance of the archaeological archive.

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 Corinthian Mountfield Ltd as the development proposal advances would be welcomed.

I trust you find the above useful and should you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,



Barbara Cooper

Corporate Director - Growth, Environment and Transport

Encs:

- Appendix 1: KCC Highways and Transportation comments regarding CA/16/00600
- Appendix 2: KCC Education and Community Services Requirements assessments
 - a. KCC developer contribution assessment for Education
 - b. KCC developer contribution assessment for Customer and Communities' services
- Appendix 3: KCC Flood Risk's response to CA/16/00600 dated 29 April 2016
- Appendix 4: KCC PRow and Access Service comments regarding CA/16/00600 and associated map