



CPRE Kent  
Queens Head House,  
Ashford Road,  
Charing,  
Ashford,  
Kent TN27 0AD  
29 September 2016

Dear Ms Jones

**Planning Application CA/16/00600: Mountfield Park**

Thank-you for the opportunity to comment on this application.

CPRE Kent has looked at the additional information provided by the applicant in response to the Council's letter dated 25 July 2016 and has the following comments:

**1. Impact on views of the City and World Heritage Site, and the Cathedral and Harry Tower**

As mentioned in our letter of 26 May 2016 there are significant views of the Cathedral and Harry Tower from the public footpath CC47 that links Old Dover Road and Nackington Road which were not taken account of in the Masterplan, or identified on Design and Access Statement parts A, B and C Figure 21 'Views from the site'. We suggested that these views should be identified and incorporated as part of the green infrastructure.

The revised Green Infrastructure Plan at figure 32a still does not address this concern.

The Council's letter dated 25 July 2016 at 6.1 requested the applicant to submit an addendum 'fully assessing the effects of the proposed development on the significance of Canterbury Cathedral as a heritage asset and on the Outstanding Universal Value (OUV) of the World Heritage Site of which the cathedral forms part, including the effects of the proposed development on views of the cathedral / WHS ....'

The Heritage Statement Addendum ES Chapter 10 (10.4) in section 3 Canterbury World Heritage Site at paragraph 3.50 states:

*'..... The significance of the WHS is, therefore, best experienced from within the centre of the city **and beyond the developed areas to the north and west, such as at Thanington and Harbledown where ancient pilgrims would enter from London and Winchester.** It is, therefore, considered that **these open areas to the north and west contribute to the significance (OUV) of the WHS to a greater degree than do the open areas to the south east, which comprise the site.** However, the location and access of The Pilgrim's Way does contribute to the experience of the WHS as an ancient and important place of pilgrimage.'* [My emphasis].

Views over the city from the north are critical. The ridge to the south of the city provides a green backdrop to the Cathedral as shown in the image below taken from Neal's Place. The application site lies on and beyond this green ridge.

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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View from Neal's Place

The Building Parameters Heights plan submitted with the application provided for individual buildings of up to 15 metres and for up to 18 metres on the Reserve site for the Hospital and business uses.

CPRE Kent expressed concern that buildings of this height will be visible from the City centre and World Heritage Site and as such would have an adverse impact on the setting of the World Heritage Site and thus did not comply with Publication Draft District Local Plan June 2014 policy HE3. Tall buildings will be visible from locations on high land on the north side of the City such as Neal's Place. There is no evidence that the Building Parameters Heights plan has been reviewed to address this issue.

A landscape and visual impact assessment needs to be undertaken to guide whether and where taller buildings could be located with detrimentally affecting views of the Cathedral and World Heritage Centre from the north and west.

## **2. Fastbus Route**

Policy SP3 (Site1 South Canterbury) of the submitted Canterbury District Local Plan requires the site to provide for a new fastbus link from the site to Canterbury City centre.

The South Canterbury Development Brief Consultation Draft March 2016 at Objective 2 'Integrate the new community into Canterbury through the provision of necessary infrastructure' at paragraph 2.5 states: *'The specific infrastructure requirements for South Canterbury have been identified and quantified through discussions between the Council, Kent County Council, public sector agencies and the land promoter, with the following aims in mind:*

- *Reducing the impact of increased travel demand arising from the development by implementing a number of key elements of the Canterbury Transport Strategy, with a strong emphasis of sustainable travel choices including the construction of a new A2 Bridge Interchange, relocating the Dover Road Park & Ride, **accommodating new Fast Bus services.**' [My emphasis].*

Figure 5 in the above document shows the fast bus route within the application site but not beyond to the City Centre.

The revised details do not appear to show an amended application boundary to include the whole length of the Fastbus link to the City Centre.

Thus only half of the Fastbus route will be provided – that which lies within the application site. The rest of the route is dependent on other landowners and funders. There is no certainty if or when the rest of the

route, through Site 10: land at Ridlands Farm and Langton Field, and the south-western part of the Kent and Canterbury Hospital site, will be delivered, or if consent will be given by Chaucer Hospital for the route to cross their land.

The Fastbus link is not in line with the emerging local plan and will be a 'white elephant' until the whole of the route is provided to enable buses to link the application site with the City Centre. As proposed it will not help achieve the objective of reducing the impact of increased travel demand arising from the development. It would not enable or encourage new residents to use the bus rather than motorised vehicle. This would affect the sustainability of the development and could worsen air quality on roads and within AQMA2.

The applicant needs to address this matter.

### **3. Air quality**

The Publication Draft Canterbury District Local Plan 2014 at paragraph 12.50 reads:

*'It is important that air quality is given due consideration in the planning process at the earliest possible stage. It is not sufficient to simply demonstrate that the impact of a development is no worse than the existing or previous land use on a particular site. Where developments are proposed within or that could impact on an Air Quality Management Area (AQMA) mitigation measures should be considered as standard practice, particularly in cases where the development is new and does not replace existing use. This is especially important where the development has the potential to result in a deterioration of air quality or introduce new sensitive receptors to the area. For example, provision for a large number of parking spaces, significantly increasing the number of trips in and out of an area, ... or new residential houses close to a busy road.'*

The recent DEFRA report on 'Improving air quality in the UK'<sup>1</sup> at paragraph 231 states:

*'New infrastructure and other developments need to be sensitively planned to ensure they do not add to, or cause, significant additional air quality issues. Air quality should be considered early in any development so that mitigation measures can be developed where necessary. Air quality considerations are firmly embedded within national policy which includes strong protections to safeguard people from unacceptable risks from air pollution.'*

The applicant has submitted an updated Air Quality Assessment: Addendum. The assessment provides data for Baseline + Howe Barracks. It is not clear if the other Strategic Site Allocations such as Land at Sturry / Broad Oak (1,000 dwellings), Land north of Hersden (800 dwellings), land at Cockering Farm, Thanington (1150 dwellings) and land at Ridlands Farm and Langton Field (310 dwellings). These provide up to 3,260 dwellings and together could have an adverse effect on AQMA2. It is not clear if these sites have been taken into consideration in the addendum.

Tables 3 and 4 in the Addendum indicate that the annual average concentration for 7 receptors in the AQMA exceed the legal compliance requirement is to reduce concentrations of nitrogen dioxide of below 40µg/m<sup>3</sup> (Micrograms per Cubic Meter of Air). Exceedance ranges from mid 40sµg/m<sup>3</sup> to almost 80µg/m<sup>3</sup>.

The Addendum at paragraph 5.6 takes the view that the adverse effects will be mitigated through the incorporation of green initiatives, planting and through the transport plan which supports sustainable

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<sup>1</sup> DEFRA Improving air quality in the UK *Tackling nitrogen oxide in our towns and cities* UK Overview document December 2016

transport options. The sustainable transport option includes the Fastbus link to the City centre. The absence of the guaranteed delivery of this link either from the start of the development or even at all brings into question the reasonableness of assuming that the adverse effects of the development on air quality can or will be mitigated such that it helps achieve the legal compliance requirement of 40µg/m<sup>3</sup> in AQMA2.

A recent Planning Opinion of Robert McCracken QC on Air Quality and emissions<sup>2</sup> sets out that:  
*'65 ... planning authorities have a duty in their decision making to seek to achieve compliance with the Directive's limit values.*

*66 Where a development would cause a breach in the locality of the development they must refuse permission.*

*67 Where a development would in the locality either make significantly worse an existing breach or significantly delay the achievement of compliance with limit values it must be refused.*

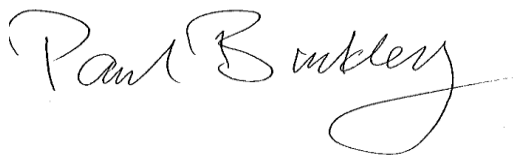
*68 Where limit values are not exceeded in the locality planning authorities must try to prevent developments from worsening air quality and to achieve best air quality ...'*

Air quality was an important issue for the Canterbury District Local Plan. Matter 16: Community Facilities and Health considered the following two questions posed by the Inspector:

- Does the Local Plan include effective policies to address the effects of development on air quality in particular and pollution in general; and
- Are there any implications for the Local Plan arising from the DEFRA Air Quality Plans for nitrogen dioxide, December 2016.

The Examination finished on 22 September and the Inspector's report, including his assessment of the two above questions is awaited. This could have a bearing on the application.

Yours faithfully



P Buckley  
Senior Planner  
CPRE Kent

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<sup>2</sup> Air Quality and emissions. Clean Air in London; Air Quality Directive 2008/50/EC and Planning Opinion of Robert McCracken QC, Frances Taylor Building. E-law January/February 2016