

Chestfield Parish Council

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Canterbury City Council
Military Road
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By email, to planning officer Ceri Williams, and development.management@canterbury.gov.uk

CA/17/00469/OUT - Grasmere Gardens, Land South of The Ridgeway, Chestfield

Outline application for up to 300 residential dwellings and 3,500 sqm of employment space use class B1a (or 1,000 sqm employment space use class B1a and a new primary school), with all matters reserved except access (excluding internal circulation) also including:

- a community hub to include shops, financial services, food and drink outlets
- non-residential institutions to include clinics, health centre, crèche, nursery and day centre
- a cafe/restaurant/bar
- 7.16ha of open space including children's play areas.

And, Detailed proposals for 140 residential dwellings, access from Reeves Way and emergency access from Richmond Road, community hub, cafe/restaurant/bar, open space and play facilities and associated car parking and landscaping.

Chestfield Parish Council has recently undertaken a survey with all households in the village, and new development was cited as the most important topic amongst residents. A development of this size and nature has a significant effect on our parish and we have been opposed to its inclusion in the Canterbury District Local Plan and dismayed that it has since been put forward as a strategic site for housing, when, we feel, there are other more suitable sites within the Canterbury District, that are more sustainable.

As the fight for its removal from the draft Plan has not been successful, Chestfield Parish Council trust this response will be both taken into account and addressed, in full, before this application is approved.

Chestfield Parish Council would like to concentrate its concerns about this major application to the following:

1. Foul drainage capacity
2. Surface water issues
3. Access, emergency access and speeding traffic
4. Transportation, public transport and parking
5. Future Maintenance of Open Space.
6. Primary Education/ Innovation Centre, Nursery, Cafe and Shops Parking arrangements

1. Foul drainage capacity.

Swalecliffe and Chestfield are low lying areas, just 10 m above sea level. This poses issues for drainage generally and the operation of storm-water and foul-water systems especially.

We are confident that there is a real problem of capacity regarding foul drainage. We have photographic evidence of the drain at the end of Chestfield Road (opposite the entrance to Maydowns Road) at the Chestfield/ Thanet way roundabout by the train station badly overflowing and flooding the road across its width after very heavy rainfall.

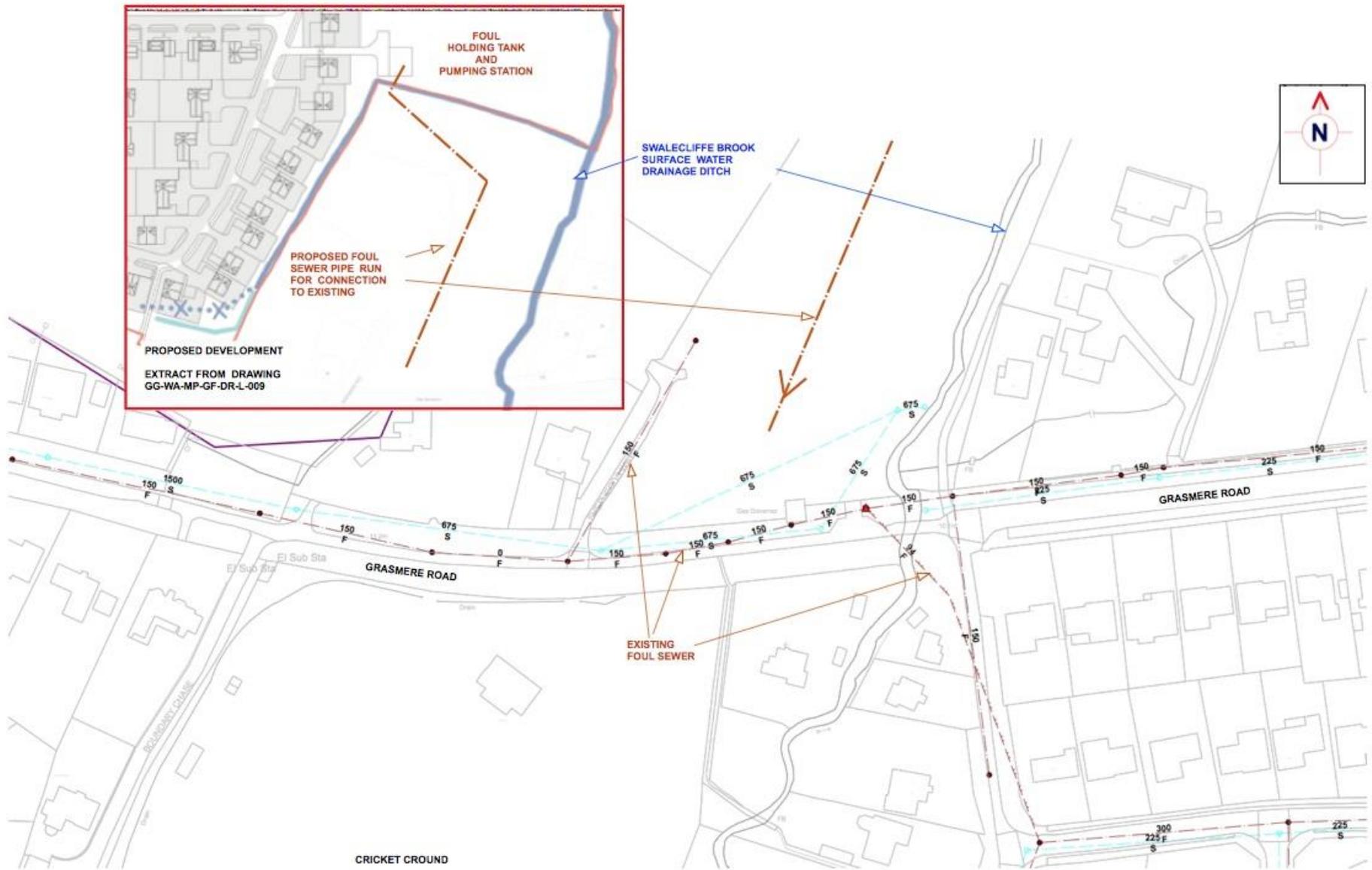
For Foul Drainage we feel that the application is deficient in that it does not detail an appropriate point of connection to a foul sewer network to discharge foul drainage from the development. The submitted plans indicate that the foul sewer from the proposed pumping station will be connected to an existing 150mm diameter sewer at the head of the a run in Grasmere Road (see reference drawing below): we question whether the 150mm diameter pipe have the capacity to take the overnight flow.

Flooding – In Chestfield, during heavy rains, quite a lot of surface water goes in to the foul drainage system which increases levels and flooding problems at the end of Chestfield Road.

Existing Sewer Capacity - We seriously question whether there is capacity in the existing sewers; as we are aware of a planning application (CA/05/1653CHE) submitted by Southern Water for a new foul/storm water pumping station on land at the bottom of Chestfield Road and opposite Maydowns Road. This application was intended to alleviate existing flooding problems in the area. (It was subsequently withdrawn, we believe on the grounds of costs of its provision). Therefore developer may need to consider an additional holding tank at the end of Chestfield Road, the costs of which would be down to the developer.

Approvals - The successful disposal of the foul flow is critical to any development and Canterbury City Council will need Southern Water's written confirmation that they can accept the new flow from the development into their public foul sewer system. The developer must get written confirmation from Southern Water around a suitable connection and capacity measures. We must ensure this is received prior to the application getting any permission from Canterbury City Council – rather than afterwards as a condition of a permission – and be satisfied that both the existing village and any development's foul water is adequately dealt with

Reference drawing - RSP CONCEPTUAL DRAINAGE STRATEGY:



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Application CA/17/00469
 GRASMER PARK
 WHITSTABLE KENT
 Drg Title FOUL DRAINAGE
 GRASMER RD

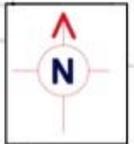
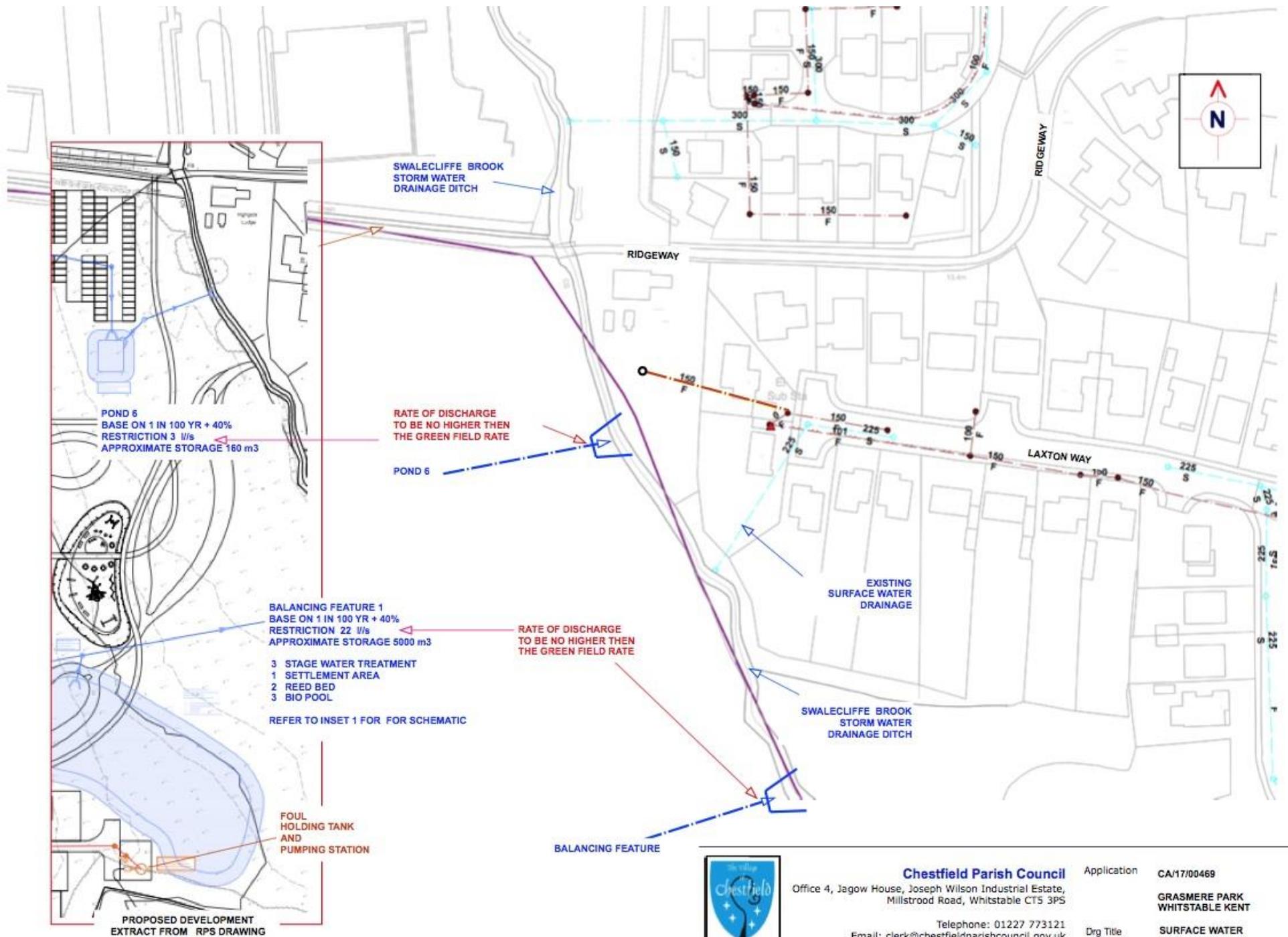
- a) The pumping station connects to an existing 150mm diameter sewer in Grasmere Road: does this have the capacity?
- b) Who is responsible for the maintenance of the Holding Tank?
- c) Assuming over-night pumping, is the existing sewer at the end of Chestfield Road adequate for the increased night flow?
- d) A capacity check needs to be obtained from Southern Water to confirm that the existing sewers are adequate to serve this development.
- e) Approval in principle needs to be obtained from Southern Water prior to granting planning permission.

2. Surface Water issues.

- There is a known history of flooding in Chestfield, exacerbated by the London Clay soil. Page 149 Para 7.22 of the draft Canterbury District Local Plan states that Canterbury City Council's objective is to discourage inappropriate development in areas at known risk from flooding. Para 7.33 states that Chestfield is a known flood risk and Para 7.34 advises the Swalecliffe Brook is at saturation.
- The Flood Risk Assessment document states that surface water drainage will discharge by outfall into the Swalecliffe Brook.
- Any flood risk along the Swalecliffe Brook should not be made worse than the current situation. The Preliminary SUDS design assumes 60% of developable area as impermeable. This may not be realistic given the desire for residents to drain their gardens. We feel 60% is impractical - no one wants a waterlogged garden so residents end up trying to drain their gardens as well.
- The Brook into which water will be fed will experience higher levels of input and flow due to climate change from its upstream catchment thereby having less capacity for accepting site discharges.

The detailed surface water drainage scheme for the site must demonstrate that surface water generated by this development can be accommodated and disposed of *without increase to flood risk on or off site*.

KCC have proposed a condition that the SUDS design be agreed with them at a later date but we would make this point. Additionally, the Environment Agency response dated 12 April 2017 comments that as the Swalecliffe Brook is a main river, the discharge rate to the river should be no higher than the greenfield rate. We would support this point and as the Flood Risk Assessment is unclear on this point, urge KCC to satisfy themselves that the proposed drainage strategy would not result in an increase on flood risk.



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Application **CA/17/00469**
GRASMERE PARK WHITSTABLE KENT
 Drg Title **SURFACE WATER DRAINAGE**

- a) Who is responsible for the maintenance of the Attenuation Ponds? (see below – a condition must be made if approval is given)
- b) Has a capacity been carried out to confirm that the existing storm water drain can take the increased run off ?
- c) Approval in principle needs to be obtained from Southern Water prior to granting planning permission.

Should CCC be minded to grant permission for this development, there must be a Condition for the management and maintenance of the sustainable drainage system in perpetuity.

The car park is partially located in an area which is predicted to flood potentially every 5 years or more.... If more parking is provided for a Primary School/ Innovation Centre and for the Nursery, Shops and Cafe then the retaining SUD area should be increased in size accordingly.

Within the documents there is a drawing that proposes a sub-attenuation tank under the car park but it is confusing because a further drawing in the ES Appendix B/H in the FRA suggests another “pond”?

The Computer Generated Image annotated as CGI3 in the application is wildly misleading and a blatant selling houses tool. The SUD is not a pond for sailing boats!

An extract from the CIRCA SuDS Manual 2015 states “drowning can occur in permanent bodies of water or in normally dry areas when they contain water temporarily during and after rainfall events. Drowning more frequently occurs from accidentally falling in rather than deliberately accessing a body of water and getting into difficulty.”

This area of open water should be cordoned off and fenced as a health and safety precaution – particular to safeguard younger children – and with life buoys attached too.

CGI3 should be withdrawn from the portal and if permission is given from the subsequent sales materials.

3. Access, emergency access and speeding traffic

The site is effectively landlocked by other established development.

The access is a single vehicular access proposed to and from the site via the existing Reeves Way.

The road is inadequate, has questionable emergency secondary access, and has a speeding concern already:

3.1 Inadequate: This route is inadequate for a sustainable development of the size proposed, especially as it also serves the Doctors surgery, the large retail stores of Sainsbury and B&Q, an extensive industrial estate and a sports facility. The additional use of this route by residents of the proposed estate (with maybe 800 - 1000 vehicles movements per day) would cause gridlock affecting both the new and existing community – no matter what improvements were considered for the surrounding roads. This could so easily create major difficulties for crews responding to an emergency, which in turn could put lives and property at risk.

3.2 Emergency secondary access: The provision of an emergency access route from Clover Rise seems ill conceived. Part-time routes like this become too easily used for additional residential parking and can become blocked, especially at night, when life is at greater risk. To be reliable and effective a secondary access route should connect directly with the primary road around the proposed development from an adjoining thoroughfare that has sufficient capacity to take the designed traffic flow.

3.3 Speeding traffic along Reeves Way:

Reeves way is already dangerous; the curve in the road itself greatly hinders safe egress from B&Q and Sainsbury stores.

Drivers trying to exit the supermarket or B&Q are compromised, as the Industrial estate vehicles come along at such speed and visibility is restricted by the bend in the road.

On occasions vehicles queue from the Doctors' surgery to get into Sainsburys and the supermarket car park and with cars also waiting to leave the supermarket on to Reeves Way. B&Q is also busy and often their car park is one third covered by water after rainfall.

This development if allowed would see up to 1000 more vehicle movements per day – all wanting to use this narrow road to reach stores and the new housing estate, making all the above problems worse.

4. Transportation, public transport and parking.

The scheme will without doubt be heavily car reliant.

Stagecoach has confirmed that there is no available suitable through route for buses; and the walking route to the nearest bus stops (rather than a straight line measurement) are far more than the 400m claim in The Transport Assessment. We support Stagecoach conclusion that the proposed development does not meet the requirements for access to sustainable transport options.

The transport assessment only focuses on the Sainsbury's roundabout and the Clover Rise junction as well as Reeves Way. It does not consider the impact of this development on Chestfield Road (which will give rise to potential problems for parishioners exiting side roads like Primrose Way) nor the impact at Tyler Hill. Tyler Hill is on one of the main artery roads to Canterbury but has a severe narrowing at this pinch point.

Swalecliffe with Chestfield train station is classified as a halt rather than a train station, and lacks any disabled access. Not all trains stop at this station so public transport provision is further limited. The limited service from this halt also does not include Canterbury.

There is a new cycle path proposed along Reeves Way but Chestfield Parish Council would also press for improvements for cyclists and pedestrians along the Ridgeway. Pedestrians are going to use this route for bus stops.

The railings at the Chestfield roundabout have been hit repeatedly during the last 18 months and the parish council has kept a log of these incidents. This has been used as a material consideration for a current request to Kent Highways that the parish council pay costs for a Traffic Regulation Order to consider a speed limit reduction from 60mph to 40mph in the vicinity of the Reeves Way roundabout and train station roundabout – to join up with the existing 40mph restriction at the Clover Rise junction. Chestfield Parish Council would welcome a condition that would reduce this stretch to 40mph, and would like to see this implemented immediately if the development goes ahead, particularly in view of those pedestrians/cyclists wishing to use the (new) school and/or train station.

Parking on site... There are already two known anti-social behaviours that occur on the John Wilson industrial estate adjacent to this site accessed by Reeves Way. There is an issue of lorries parking overnight in refrigerated trucks – which are very noisy for residents in the nearby Primrose Way estate. There is also the repeated and ongoing issue, known to the Police, of 'boy racers' accessing the industrial estate, again making a lot of noise with fast driving.

The parish council is concerned that both the provision of new parking and roadways within this development, and the displacement of the Reeves Way current on-street parking will merely move these two issues.

5. Future Maintenance of Open Space.

The S. 106 agreement needs to cover the future maintenance of Open Space. There is a large amount of meadow, ponds and other open space proposed which needs maintenance. This needs to include measures to prevent flytipping (including in the Brook itself) and any potential for the illegal parking of caravans.

Chestfield Parish Council would seek an assurance that future maintenance arrangements will be set up in perpetuity – ideally by a management company and resident financial contributions for upkeep of their estate communal areas. The maintenance of the Ridgeway bridleway and verges should also be included where it passes the North of the site. We have problems with the neglect of the Ridgeway section immediately to the East of the Swalecliffe Brook because past development in the Primrose Road area did not provide for maintenance of the verges here. (We have also had the same problem with another footpath in Chestfield which is the property of Allied London Properties and not maintained by this owner.)

6. Primary Education/ Innovation Centre, Nursery, Cafe and Shops Parking arrangements

Stagecoach has confirmed that of the proposed clinic, health centre, creche, nursery and day centre - none can be served by public transport.

Therefore adequate parking arrangements should be made for their use.

There are only 13 spaces proposed for the Nursery, nine shops and Cafe ('community hub') which we think is inadequate.

The width of the proposed road here is 6m which would limit on street parking and cause a bottleneck. The road should be wider here to accommodate more on street parking particularly because this road leads to a major proportion of the housing in the scheme.

If a Primary School is provided then a larger car park must be provided next to the Primary School or other measures to help with the drop off and collection of children by car.

The Cafe is raised up on the first floor and there is no disabled access shown. There are no disabled car parking spaces shown near the community hub. These deficiencies should be addressed.

The proposed school has no playing field shown or area set aside for it which we believe is another deficiency.

Conclusion

Chestfield Parish Council noted with interest the very recent refusal on 4 April 2017 by Canterbury City Council of a similar development in the vicinity CA/16/02971 – Land at Grasmere Road for 170 dwellings.

We feel this sets a precedent for a similar refusal here on these identical grounds in particular (numbered 1, 2, 3, 4 and 6 in the Planning Refusal Notice):

1. The proposed development would result in the loss of an area of protected open space which supports the social and cultural well-being of the local community, to the detriment of the visual and recreation amenity of the area, with no justification which would outweigh the harm caused. As such the proposed development is contrary to the core principles of sustainable development as set out in the National Planning Policy Framework, Policy C28 of the Canterbury District Local Plan 2006, and policy OS9 of the Canterbury District Local Plan 2014 publication draft.

2. Insufficient information has been submitted to demonstrate that the development will not have a significant environmental impact, particularly cumulative and in combination impacts with regard to traffic and air pollution when considered with other planned development in the surrounding area, contrary to policies BE1, C1, C39, & C40 of the Canterbury District Local Plan 2006, policies DBE3, T1, QL11, & QL12 of the Canterbury District Local Plan 2014 publication draft, and the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).
3. The lack of a second or emergency vehicular access to the southern part of the site, and the use of the Grasmere Road access as the primary access to the northern part of the site, results in a development which would have an unacceptable impact on highways safety contrary to policies BE1, C1, & C4 of the Canterbury District Local Plan 2006, and policies DBE3, T1, & T17 of the Canterbury District Local Plan 2014 publication draft.
4. Insufficient information has been submitted to demonstrate that the proposed development would not have an unacceptable impact on the free flow of traffic in the local highway network, to the detriment of highway safety, for which mitigation may be required contrary to policies BE1, C1, C4, and IMP2 of the Canterbury District Local Plan 2006, and policies DBE3, T1, & T17 of the Canterbury District Local Plan 2014 publication draft.
5. Insufficient information has been submitted as part of the application to demonstrate that the proposed development will not increase the risk of surface water flooding on site and elsewhere during the lifetime of the development contrary to the core principles and paragraphs 99, 100 & 103 of the National Planning Policy Framework; policy C31 of the Canterbury District Local Plan 2006; and policies CC4 & CC11 of the Canterbury District Local Plan 2014 publication draft.