

Highgate Lodge, Ridgeway, Whitstable, Kent CT5 3JT

Ms Angela Furlong
Canterbury City Council

By email only

7 December 2016

Dear Ms Furlong,

**Re: Canterbury District Plan – Inspector’s Request for Submissions on Government AQP
Proposal to Include Grasmere Pasture in the Local Plan**

In the submissions in relation to the proposed inclusion of Grasmere Pasture into the local plan, detailed submissions have already been made regarding the unacceptable increase in pollution likely as a result of the proposal to develop this land, both regarding existing housing areas neighbouring the proposed development and the some 300 plus dwellings, workplaces and school proposed to be built. I shall therefore limit my submissions to new points arising from the High Court judgment in *Client Earth (NO.2) v SSE and Others [2016] EWHC 2740 (Admin)*.

The area around the Grasmere Pasture is already congested. It borders several very busy main roads carrying heavy volumes of polluting, unregulated commercial and domestic diesel traffic and public transport. The area is already densely populated. A risk of excessively high nitrogen dioxide emissions in the proximity of the proposed development will plainly arise from:

1. Heavy and light diesel-powered goods and domestic vehicles using the existing road network, including the A2, M2, A299 and Old Thanet Way.
2. Heavy and light diesel-powered goods and domestic vehicles using the John Wilson industrial Estate, directly abutting the site of the proposed development, in addition to Sainsbury’s, B&Q and the adjacent commercial and industrial buildings along the Old Thanet Way.
3. Light diesel-powered and petrol commercial and domestic traffic servicing the proposed development and owned by residents of the proposed new housing.
4. Aging diesel-powered buses servicing the area.
5. Extreme traffic congestion as a result of constant queues on access roads to and from the Old Thanet Way, with no proposal to ameliorate this by an overall plan to control and ease such unacceptable levels of traffic congestion.

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To my knowledge, Canterbury has not prepared a forward-looking AQP in relation to this area notwithstanding the huge and increasing volume of heavy goods vehicle traffic using the Channel Tunnel and Channel ports, Project Stack, and the unavoidable increase in traffic congestion and queuing which will result from introducing more than 1,000 extra daily car, bus and van journeys to and from the proposed development to an already congested road network.

The council has a duty under EU Directives to do so in respect of proposed new residential development or location of schools in areas abutting high volumes of diesel powered traffic: DEFRA figures show that more than half of unacceptably high NO2 pollution levels arise from exposure from adjacent roads.

Whilst the pressure on Canterbury Council from central government, and commercial developers whose sole criterion is to generate profits, to build new houses anywhere and everywhere is understood, the council has a duty under the relevant EU directives to consider the environment of existing and anticipated new residents. Building ever more congested housing areas in the proximity of congested, polluting road networks, where no emissions controls are in force, is contrary to EU directives and English law.

Retrospective planning is no planning. Forward planning, especially where the lives of vulnerable people are concerned, is the minimum required standard for establishing new housing areas or increasing the population density of existing communities. The council should therefore call an immediate halt to the process of implementing the local plan until it has in place a proper, forward-looking AQP, which takes into account the proposed new housing and traffic its local plan will attract.

For the reasons expressed above, I have kept my submissions brief. However, I would welcome the opportunity to address the inspector in more detail in an oral hearing on this issue.

Yours sincerely,



MARK BOARDMAN