

Alexander Gunyon

From: allanah James [REDACTED]
Sent: 31 May 2024 15:53
To: Consultations
Subject: Comments on the Canterbury Draft Local Plan 2040

Categories: Blue category

You don't often get email from [REDACTED] [Learn why this is important](#)

--Email From External Account--

Cherie A James
[REDACTED]

I wish to comment on the Canterbury Draft Local Plan 2040.

I do so in my capacity of current resident and regular visitor to the area concerned by proposal C12.

My comments are in relation to Chapters 1, 2, 5 and 6 of the Plan and in particular to Policy C12 of Chapter 2.

I am writing to express my clear objection to the proposed plan to construct a new town comprising 2,000 residential units on prime agricultural land that is not only vital for sustaining local biodiversity but also borders ancient forests, which are invaluable natural resources.

The Council's actions in pursuing this development directly contradict its own established policies and guidelines, as it seems to be hastily pushing forward a flimsy and inadequately justified case instead of seeking a legitimate exemption from the Central Government, based on Canterbury's exceptional circumstances and unique challenges.

Developments of such a massive scale and magnitude should prioritise the utilisation of numerous brownfield sites and previously developed land before even considering the irreversible and harmful act of paving over and destroying pristine countryside and natural habitats. It is crucial that the Council re-evaluates its approach and aligns its actions with its stated commitment to environmental protection, sustainable development, and the preservation of Canterbury's rich natural heritage.

A key drawback of the proposed site under policy C12 is its location as an isolated rural housing estate devoid of essential amenities and services. This lack of amenities implies that even in the hypothetical and unlikely scenario where the Council contemplates and implements a program to subsidise free bus access for all prospective new residents, it would still be reasonable to expect an influx of between 3,000 and 4,000 additional private vehicles onto the existing rural road network.

Furthermore, the inherent access challenges that initially led to the rejection of this site during previous evaluations have not been adequately addressed or resolved in any meaningful way. The fundamental issues concerning accessibility and connectivity to the broader transportation infrastructure remain unresolved, casting doubt on the viability and suitability of this proposed site for residential development.

Rough Common Road, a narrow residential street with weight restrictions currently in place, would undoubtedly undergo a transformation into a major thoroughfare or trunk road to accommodate the influx of

heavy construction vehicles during the development phase. Subsequently, it would be burdened with thousands of additional passenger vehicles, mostly single occupancy cars, as residents of the new housing estate use it as a primary route to access Canterbury city center, exacerbating traffic congestion and strain on the road infrastructure.

The intersection between Tyler Hill Road and Blean Common has been the site of multiple incidents and accidents, highlighting the existing safety concerns and potential hazards associated with increased traffic volumes. Moreover, in 2019, the A290 Whitstable Road gained notoriety as one of the most perilous and dangerous roads in the United Kingdom, further underscoring the need for comprehensive traffic management and safety measures to mitigate risks to motorists and pedestrians alike.

In the aftermath of heavy rainfall events, numerous gardens in the Blean and Tyler Hill areas experience significant flooding, with one particularly persistent and substantial puddle along the Crab & Winkle Way remaining for an extended period of six months. This recurring flooding issue can be attributed to the geological composition of the area earmarked for development, which is comprised predominantly of London Clay with superficial deposits of Head material (a mixture of Gravel, Sand, Silt, and Clay). These soil conditions render traditional drainage solutions, such as soakaways and field drainage systems, ineffective and inadequate for satisfactory water management. The proposed construction of 2,000 new housing units, along with the associated impermeable surfaces like concrete and tarmac, would exacerbate the existing flooding problems in the area. Even with the implementation of mitigating measures like Sustainable Drainage Systems (SuDS), the underlying soil characteristics of the site make it highly unlikely that such systems would function effectively, leading to regular and widespread flooding throughout the entire region, regardless of the mitigation efforts employed.

In addition to the flooding issue is the concern around Wastewater Treatment Works, particularly in relation to the Stodmarsh Nutrient Neutrality issue. In 2022 the Chief Executive of Southern Water acknowledged that the removal of Phosphates and Nitrates at Stodmarsh is a significant issue locally. As reported at the time -

“In a stark admission made by Simon Thomas head of Canterbury City Council’s planning department, in relation to the [Stodmarsh Nutrient Neutrality](#) issue; has said: The longer-term proposals to upgrade the wastewater treatment works at Canterbury will help deal with phosphorous, and to some extent, nitrogen, but that upgrade is likely to be at least 8 years in the future.”

Natural England has called for a pause to house-building to stop irreversible damage to the Stodmarsh River and National Nature Reserve, caused by nitrates from non-organic farming and human sewage.

Regarding population projections for Canterbury, and the requirement to build more homes in the area it has been reported at <https://www.savetheblean.org/housing-strategy/> -

“The National Housing Strategy to build 300,000 houses a year plays into this new proposal, with the Council facing the challenge that new houses need to be built somewhere in the district otherwise Canterbury will miss its targets.

However, the number of houses that need to be built in each area are based on figures produced by the Office for National Statistics (ONS). The Alliance of Canterbury Residents’ Associations (ACRA) has concerns around the district’s failure to use the latest population projections, and has urged the Council to plead Canterbury’s case for exceptional circumstances due to a falling population in the district.

A report commissioned by Canterbury City Council in 2021 shows that the rate of growth forecast by the ONS is no longer realistic. The Edge Analytics report predicts population growth of 8% between 2023 and 2040 – half the rate forecast by the ONS.

Under the new National Planning Policy Framework, the Council can make the case to Central Government that Canterbury has “exceptional circumstances” and therefore should have its local housing targets adjusted – we strongly urge them to do so.”

I reiterate the last sentiment and strongly object to the council's proposed plan.

Regards
C A James