

Draft Local Plan Consultation 2040 - Comments

Andrew Barton [REDACTED]

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To:Consultations <Consultations@canterbury.gov.uk>

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Comments on draft Local Plan 2040 - Andrew Barton 2 June 2024.pdf;

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2024

2 June

Dear Sirs

Draft Local Plan Consultation 2040

Chapter 2 Policy C12 Land North of the University of Kent

I would like to make the following comments on the draft Local Plan 2040. These comments all relate to Chapter 2 Policy C12 Land north of the University of Kent unless noted otherwise.

1. Policy C12 : Village Atmosphere

The villages of Blean, Tyler Hill and Rough Common currently enjoy a traditional village atmosphere, and is described in the Landscape Character Assessment as an area having a strong rural character. The infill of the land between these villages and urban Canterbury, with a large influx of people will in my view result in the loss of this rural benefit, and adversely affect the lives and enjoyment of the current village residents.

2. Policy C12 : Loss of Countryside and Habitat

The development is located within the Blean Woods area, and is rich in wildlife. The Council's policies state that it is important to connect up areas of woodland to promote and protect wildlife. The construction of such a large development will inevitably result in the loss of this habitat. I believe that this is undesirable situation.

National Planning Policy Framework paragraph 180 states that "planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character of the countryside, and the wider benefits from natural capital and ecosystems – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland". I am not convinced that the proposal has recognised the intrinsic character and beauty of the Blean countryside, and the wider benefits from natural capital and ecosystem services.

3. Policy C12 : Traffic and Congestion

The proposed development in the Land Assessment is described as Car Dependent. I assume that Rough Common Road will be the main connector road to the development. This road is already very busy, and at peak hours there is often congested. I am concerned that the influx of new people and businesses to the area will make this problem significantly worse. I believe that the additional traffic will create unwanted noise, congestion and traffic related hazards to the residents of the area, particularly in Rough Common Road.

4. Policy C12 : Access

It is understood that the main access to the development site will be from Whitstable Road, and that the southern and main access will be through a Conservation area. I do not think the construction of this road is compatible with the intention of the conservation area designation.

The existing narrow and winding Tyler Hill Road crosses the northern part of the development. The draft Local Plan says that it will minimise traffic flow onto Tyler Hill road. I am not convinced that this objective is practicable given that Tyler Hill road provides direct access to A290 Whitstable Road leading to Whitstable, the Thanet Way and London. Similarly in the easterly direction Tyler Hill Road gives access to Hackington Road and Herne Bay. I suspect Tyler Hill Road will become a 'rat run' and cause nuisance to existing residents.

5. Policy C12 : Noise

The current farmland is a tranquil area. I am concerned that the proposed development will generate ambient noise that will adversely impact the lives and enjoyment of the local residents.

Government guidance in the Noise Policy Statement for England is to aim to "avoid noise from giving rise to significant adverse impacts on health and quality of life" and PPG24 Planning and Noise contains advice that the planning process should be used to avoid a significant observed adverse effect, and to prevent an unacceptable adverse effect occurring. I believe that the development will have a significant observed adverse effect.

6. Policy C12 : Light

The current farmland is unlit at night. I am concerned that the proposed development will create significant light pollution that will adversely affect the enjoyment of the night sky by local residents. I am also concerned that the light will have a harmful effect on wildlife including the bats and owls that are present in the area.

7. Policy C12 : Farming

I appreciate that the economic margins on arable farming are tight, however I believe it important that the nation is largely able to feed itself, to help protect us from the ever volatile world. The irreversible conversion of this Grade 2/3 farmland to housing, is in my opinion unwise and undesirable.

8. Policy C12 : Drinking Water

In the summer months the water supplies are often under pressure, with hose pipe bans implemented. I am concerned that the influx of new people to the area will make this problem worse. I appreciate that there are plans for the Broad Oak reservoir which may help solve the problem, however these plans have been in hand for many decades, and I do not think it appropriate to commit to new development until the this reservoir has been realised and is operational.

The draft Canterbury District Infrastructure Delivery Plan to 2045 states the objective to provide the reservoir, but in Appendix E is unable to confirm the funding mechanism, estimated cost, scheme status or timescale for delivery.

9. Policy C12 : Sewerage

There are already well publicised issues about the release of untreated sewerage to the sea, closing beaches and potentially causing ill health to swimmers. In addition there are well known water quality problems with the Stour Valley river catchment area. I am concerned that the influx of new people to the area will make these problems worse.

I understand that there are proposals for a waste water treatment works in the north eastern part of the site, potentially close to Blean village. Details of the treatment works are not clear, but I am concerned that the potential noise from plant and odours from sludge might have a long term adverse impact on adjacent residents.

10. Policy C12 : Health Care, Schools and Policing

The existing GP, dentist and police services are already overstretched. Similar I assume for schools. Unless these services are to be expanded, I believe it inevitable that the new development will have

an adverse impact on these essential services to the existing local community.

The draft Canterbury District Infrastructure Delivery Plan to 2045 states that there are already significant existing pressures on the services listed above. I believe appropriate funding should be in place for these public services and others before the new Blean development is committed to.

11. Policy C12 : Housing Policy

Item 2.19 states the proposed Blean development will provide 'a range of housing to meet local needs'.

Reliable anecdotal evidence from local estate agents indicates that a significant proportion of recent house sales are for second homes for, or relocation of, Londoners – one agent reported over 50% of such sales in the last 3 years. Figures have been published that indicate that Canterbury District has, along with Thanet, the most number of second and empty homes in the County. It appears to me that locally the housing market is to an extent broken, and until appropriate and effective measures are taken to reduce this activity, I do not think it justifiable to lose valuable countryside for the sake of lifestyle choices or desire to accumulate property and wealth by people from outside of the area.

It is understood that the social housing in a few of the recent housing developments in the Canterbury district, including the Howe Barracks site, has been sold to London Boroughs who have the funds and appetite to solve their housing needs by moving their residents to rural areas. Again, I do not believe that our countryside should be used to solve the housing policy problems of authorities remote from this area.

This comment also relates to Chapter 1 Strategic Objectives for the District.

12. Policy C12 : Climate Change and Embodied Carbon

Every year it is becoming evident that the effects of climate change are having an adverse effect on the world. I believe that the Blean development, along with others in the District, should consider this, and if it cannot be demonstrated that it is carbon neutral, then it is in my view is unviable and should not be supported.

The proposed Blean development will require the manufacture of materials, their delivery and construction, all of which creates a significant volume of carbon, known as embodied carbon (potentially 160,000 tonnes based upon 80 tonnes of CO₂ per 2 bed dwelling). Carbon is the key driver of climate change.

Policy SS2 states that proposed developments should be designed 'to achieve net zero operational carbon emissions'. It appears that no consideration is being given to embodied carbon created during the development's construction and its eventual demolition, hence the Blean development is likely to have an adverse affect on climate change. If included in the local plan, I think it should be a requirement for promoters and developers of the Blean development to demonstrate that the whole life of a proposal, from construction, through its operational life and its eventual demolition, is carbon neutral.

Note 'energy efficient' homes often have more embodied carbon within the materials used to make them energy efficient, than in conventional construction materials, so are not necessarily the solution.

This comment also relates to Chapter 1 Policy SS2: Sustainable Design Strategy for the District.

A signed pdf copy of this letter is attached to this email.

Yours faithfully

Andrew Barton