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From: Peter Slaughter [REDACTED]
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To: Consultations
Subject: Response to Consultation on CCC draft Local Plan 2040

Categories: Green category

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Dear CCC Consultations Team,

Please find my consultation response comments and objections below.

Thank you,
Peter Slaughter

Response to Consultation on CCC Draft Local Plan 2040

Page 17. Development Strategy. Policy SS3

CCC's housing proposals appear to be based on the premise that housing and biodiversity problems can always be solved by sacrificing agricultural land. There should be more robust protection of best and most versatile agricultural land. It would also be appropriate to undertake a review of land use to find sites that are not being used beneficially. For example, it would counterproductive for the University of Kent to build houses on agricultural land when the university is surrounded by parkland that is not in productive use, nor does this see much use recreationally.

Whitstable residents are concerned that the unofficial "green belt" that separates them from The Blean woodland has no statutory protection, indeed no protection at all in the draft Local Plan 2040. Nevertheless, it is in parts more scenic than some areas of the Kent Downs AONB. This anomaly should be rectified.

Page 73. Whitstable Vision.

There is nothing in CCC's vision for Whitstable that recognises the community's rural setting in its surrounding area of High Landscape Value. This is part of its unique identity and tourist appeal, and there is good potential for nurturing "sustainable tourism" using the footpath and cyclepath routes through the ancient Blean Woods to Canterbury. Unfortunately, CCC seems to be blind to these charming characteristics, and views Whitstable's rural hinterland simply as vacant land to solve Canterbury's housing targets. This vision does not comply with the NPPF (section 20d) which states that policies should conserve such landscapes.

Page 77. Whitstable Harbour. Policy W2.

The Draft Plan appears to suggest that CCC would consider the possibility of residential development in the harbour area. This would **not** be acceptable due to the risk that future residents would demand reductions in activities that are necessary for the harbour to work effectively.

Page 78. The deceptively-named “Whitstable Urban Area”. Policy W3.

Sites W4, W5 and W6 currently lie outside the urban area, according to the adopted (current) Local Plan.

I strongly object to CCC’s intention to extend the boundary of the “Whitstable Urban Area” to include rural agricultural land with scenic views, highly valued by Whitstable residents as recreational open space by virtue of the public footpath network. Some of this is classified as an Area of High Landscape Value.

No justification has been made for the planned new interchange between the A299 and Chestfield Road / Radfall Hill. This is presented as a benefit bestowed by site W4, yet local residents see it as potentially causing significant increases in traffic on unsuitable local roads such as South Street, Millstrood Road, Chestfield Road. Residents are concerned the benefit seen by Canterbury planners is that it will unlock further agricultural land for development between Whitstable and The Blean woodlands, destroying what little is left of Whitstable’s unprotected rural surroundings.

The proposed south Whitstable strategic development area should be scrapped, apart from the site at Bodkin Farm, assuming that the new school is necessary. The housing required by CCC should be built on the outskirts of Canterbury, because many of the new residents will be working there or sending their children to the grammar schools there. Canterbury also has the advantage that it has more room to expand, unlike Whitstable which cannot expand in any direction except south.

Page 81. Brooklands Farm. Policy W4.

Like many other residents, I object in the strongest possible terms to the deeply unpopular Policy W4. Reasons include:-

This is an Area of High Landscape Value, not only in the current adopted Local Plan but in people’s personal values.

The development would seriously affect local wildlife, for example in the Local Wildlife Site (LWS) at Convicts Wood. The proposed site also lies within the zone of influence of the SSSIs of the Blean Wood Complex. The expected population of over 3000 residents and their pets would be likely to cause much wear-and-tear on the LWS and frighten-away some of the fauna. No doubt you will consult with Kent Wildlife Trust, but unfortunately they don’t seem to have full data on the LWS or the surrounding flora, fauna and ecological networks. The existing unimproved grassland of the pastures supports an eco-system dependent on the cattle and the associated dung and insects. That is why for example we see swallows and house martins at the farm and hardly anywhere else around here. There is also a good population of bats that can be seen flying around the trees along the Brook and along the eastern boundary of the site. Trout and eels have been recorded in the Brook on several occasions. They would be adversely affected by nearby human activity, especially fishing!

Flooding. As you will know the Swalecliffe Brook already floods the farmland and engulfs footpath CW27. Occasionally South Street is flooded. CCC are in a difficult position with the hydrology of this site, as they are dependent on advice from the Environment Agency, and it is

not clear if the EA have sufficient local knowledge of the river-basin / catchment area of the Swalecliffe Brook and how it will be affected by the increased intensity of rainfall predicted to occur as climate change progresses. They will certainly need to consider flooding outside flood zones 1, 2 and 3. No doubt CCC would require SUDS, but these would need to be located outside the Flood Zones, and it is not clear what is supposed to happen when the SUDS reach capacity.

Page 86 - Land South of Thanet Way - Policy W5

I object strongly to constructing houses on this scenic viewpoint (wonderful vistas across the Thames Estuary and to The Blean in the south. Development here would conflict with the relevant NPPF policies.

Development here would be an eyesore because it lies on a ridge of high land clearly visible from a distance from north and south.

Traffic from this development, such as parents driving children to the nearest primary school (Joy Lane) would make worse the documented highway safety problems on Borstal Hill near the Long Reach roundabout. CCC and KCC highways have not yet provided any solution to the hazards here.