

Chislet Parish Council

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19.05.24

Ms V Asimaki
Principal Policy Officer
Canterbury City Council

Dear Ms Asimaki

Re: Comments on Draft Canterbury District Local Plan

Chislet Parish Council (CPC) welcomes the opportunity to comment on the Draft Canterbury District Local Plan. We thank our colleagues at Canterbury City Council (CCC) for their hard work that sits behind the documentation and proposals. Below we summarise our feedback.

Overview

We welcome the change in the tone and emphasis in the revised draft Local Plan, compared with the previous draft published by the city council in early 2022.

However, we are concerned about the high housing numbers incorporated into the Local Plan. We do not agree that the council has no choice but to adopt a standard central government methodology to establish housing needs in the district. Current government policy says that these figures are now advisory rather than mandatory. We understand the concern that if the current Plan is not revised in time it could lead to a presumption in favour of development, and unsuitable sites being given planning approval. There are many reasons why Canterbury district might claim exceptional circumstances (lower population projections, a high student population, a World Heritage Site, an Area of Outstanding Natural Beauty and 15 sites of special scientific interest). Swale Borough Council has recently gone out to tender for a consultant to review whether they could argue exceptional circumstances. We suggest the CCC does the same.

We are also concerned that the plans are Canterbury-centric with little consideration of the wider district or rural settlements.

Proposals must be compatible with access needs of rural residents, including public transport and ongoing provision for private transport.

We are also concerned about how the transport strategy will be funded and whether improved bus provision will be extended to rural settlements.

Highways and Transport

Chislet Parish has already experienced a significant increase in traffic and the cumulative effect of developments included in the Draft Local Plan 2040 will lead to an even bigger increase over the life of the plan. There is very little reference to the main A28 route from Canterbury to Thanet, and how the projected increase in traffic will be mitigated.

Our rural parish has already seen a worrying increase in:

- traffic from Hersden accessing the A299 and A2 via Upstreet & Chislet, and
- passenger traffic along the A28 between Thanet and Canterbury
- heavy duty traffic from Thanet accessing the Lakesview Business Park & recycling centre.

In the future this will increase due to:

- the enormous increase in houses at Manston and Thanet more widely
- the further development of up to 800 homes on Land North of Hersden Point 8.12 Site 8 Carried Forward from the 2017 Local Plan
- Policy R5 of the Draft Local Plan 2040 Bread and Cheese Field 150 dwellings
- Policy R6 Land at Hersden 18 dwellings

Policy SS4 – Movement and Transportation Strategy for the district. This policy is very Canterbury-centric and proposes little to help rural parishes such as Chislet.

Point 4 of SS4 says: The council will continue to work with partners to improve public transport connectivity in the rural areas and to maximise opportunities to improve walking and cycling routes to connect rural settlements with each other and to the urban areas within the district.

Later in the document, **Policy DS14 Active and sustainable travel**, says nothing about how this policy will help rural areas.

In particular we would like to see physically segregated cycle lanes out of Hersden on A28 to Upstreet and beyond to connect to the Thanet coastal cycle paths. There is nothing relating to improving Upstreet village / Chislet access to countryside via enhanced signage and rigorous maintenance / enforcement of footpath network. This seems further evidence that rural communities are being left as an afterthought in this plan.

Points 5 and 6 of **Policy DS7 Infrastructure Delivery** point state that Dedicated Planning Agreements (s106 of the Town and Country Planning Act 1990) and the Community Infrastructure Levy will be used to mitigate the effects of development.

We ask that part of this funding be used to mitigate the impact of increased traffic flow from new housing in Hersden on neighbouring settlements. Consideration should be given to improvements in the road system, including a reduction of the 60mph speed limit out of Hersden towards Upstreet

Renewable Energy

Policy SS1 – Environmental Strategy for the district. Point 9 states that “Large scale renewable power generation applications will be encouraged, in line with Policy DS25”.

Policy DS25 Renewable energy and carbon sequestration Point 1 states that “**significant** weight” will be given to “the carbon emissions reduction and energy resilience that the projects can deliver”.

We are concerned that this policy will be used by developers to build very large industrial facilities across huge swathes of the best and most versatile agricultural land in the countryside

We strongly object to the wording of these two policies which we believe will make it very difficult to resist the large-scale industrialisation of the countryside. with detrimental effects to the rural landscape, wildlife and residents. We are not against solar energy, quite the opposite. Solar energy has an important part to play in tackling the climate crisis. But this needs to be in the right location and of a suitable scale.

Solar developers want to maximise their profits and this means building facilities as large as possible as near to a grid connection point as possible. This could mean the destruction of the district’s most precious landscapes unless careful thought is given to the policies designed to protect them.

We note that **policy DS25** says proposals for renewable energy projects “will be supported where this aligns with other policies in the plan”. We recognise that this is where damage to landscape, amenity, heritage, wildlife and loss of best and most versatile agricultural land will be considered. However, we believe that giving “significant weight” to the amount of energy produced will tip the balance too far in favour of developers proposing extremely large-scale facilities.

The current adopted Local Plan (2017) handles this issue with **Policy DBE2 Renewable Energy** which lists the ways in which energy developers must avoid damaging their environment or residents’ amenity.

We propose that the word “significant” be removed from DS25 and the list of protections currently given by policy DBE2 be reinstated.

We also believe that the 2022 iteration of the Climate Change Topic Paper should be removed from the supporting material of the Local Plan. It is currently referenced in the 2024 version of the Climate Change Topic Paper even though its contents have not been subject to the same rigour as the Plan and the inclusion of suggestions for sites seems arbitrary and creates the wrong impression of consent.

The 2022 Climate Change Topic Paper Table 6.3.1 / SLAA280 refers to the solar infrastructure project that the councils of Chislet and Hoath have strongly objected to on the grounds of damage to the rural economy and environment by the redesignation of best and most versatile agricultural land. It should be removed.

We would like more emphasis put on rooftop solar, on commercial as well as residential developments. Site 8 Land North of Hersden alone contains 1 hectare of business space. Solar panels should be put on roof tops, not on the best and most versatile agricultural land.

Green Gap

We are disappointed that CCC has dismissed our request for a Green Gap between Upstreet and Hersden. This should be included as CCC has committed to CPC in the past. Successive developments have narrowed the gap between the two settlements. Green Gap protection should not just be for when settlements are in imminent danger of coalescing.

Local landscape designations

Point 3 **Policy DS19 Habitats, landscapes and sites of local importance** should be amended to give greater protection to landscapes of local importance. The current wording of point 3 only refers to developments **within** the LLD. This should be extended to include proposals for development likely to have an adverse effect on the LLD. The current wording leaves LLDs vulnerable to having their special character eroded by inappropriate development immediately adjacent and overlooking them.

The Canterbury District Local Landscape Designations Review (2021) conducted by LUC evaluated the Wantsum Channel LLD and concluded that the Nethergong Penn was a “distinctive valley” with a “strong and unique sense of place”. Ideally the Local Landscape Designation (LLD) would be extended to include the valley slopes as well as the base of the valley as development of the slopes will damage the LLD. Alternatively point 3 of Policy DS19 could be reworded to echo the wording of Point 1 of DS19 ie to include any “development likely to have an adverse effect, either directly or indirectly” on a LLD.

Policies for Rural areas

The current adopted Local Plan (2017) contained several good policies that related specifically to protecting the character of rural areas. It is regrettable that these have either disappeared completely (**Policy T16 Rural Lanes**) or **been amalgamated into more general policies (Policy EMP12 Agricultural Land in the current adopted local plan has become part of the more general Policy DS12 - Rural economy in the new draft plan and Policy TV7 Rural Tourism in the current adopted local plan has become part of the more general Policy DS11 - Tourism development in the new draft Local Plan.**

Please reconsider reinstating these standalone rural policies or, if that is not possible, redraft the new general policies to include the experience of rural residents.

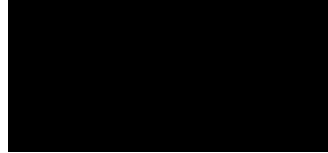
Conclusion

CPC agrees with the variety of feedback comments we have heard from our peer rural communities that CCC’s Draft Local Plan requires closer consultation and community agreement for relevant proposals that go beyond the highly publicised issues of location of houses and Canterbury traffic.

CCC must provide published evidence that the cost / benefit of major proposals that is balanced between rural areas (who take cost) and district urban areas (who take benefit); and rural residents (who bear the risk) and private developers (who take the gain)

We hope our comments will be given fair consideration. We would be delighted to engage further if you require more information.

Yours sincerely



Geoff Eaton
Clerk to Chislet Parish Council
On behalf of Chislet Parish Council