

## Alexander Gunyon

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**From:** Policy  
**Sent:** 03 June 2024 15:36  
**To:** Consultations  
**Subject:** Fw: Personal Response to Draft Local Plan 2040 consultation - second email

**Categories:** Green category

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**From:** case.updates@canterbury.gov.uk <case.updates@canterbury.gov.uk>  
**Sent:** 03 June 2024 14:25  
**To:** Policy <policy@canterbury.gov.uk>  
**Subject:** FW: Personal Response to Draft Local Plan 2040 consultation - second email

----- Forwarded Message -----

**From:** Tim Carlyle [REDACTED]  
**Sent:** 03/06/2024, 13:59  
**To:** planning@canterbury.gov.uk  
**Subject:** Personal Response to Draft Local Plan 2040 consultation - second email

### --Email From External Account--

Dear Sirs

I omitted one personal point in my earlier email which also attached the CHDF response. Just for clarity, I paste together my personal composite email with both points :

Tim Carlyle

### Policy DS6 - Sustainable Design

#### Section 6 - Density

Why are you not prepared to call for at least some of the suburban estates to be higher density - say up to 80d/H. This reduces the carbon load, and the land take. It needs skilled design both physical, social and financial, but it's the only way to go. Your carbon reduction document makes it clear just how little impact there is going to be on carbon consumption, so why not try to at least get some of the fabric at reduced embodied carbon. It is financially cheaper too.

section 10 - but 8 as well.

Many of the intentions of this policy are admirable, but the delivery is impossible to understand. The outcomes are rather like those that Milton Keynes Development Corporation set out with when they set out not only to build houses but also communities. They did the community building by paying lay sums of money to very experienced community development companies who has one of tow workers living in each of the new neighbourhoods for 5 years, as the main resource, plus quite a lot of back up - eg there was a MKDC cable radio station, high quality community art and celebratory event etc etc.

You say nothing about resourcing the scheme - which puts it into the same class as your transport modal shift plan - aspirational, ie useless. But, it is actually worse than useless because it will give community capacity building a bad

name because it will clearly fail: you cannot ask housing developers to make up their own community development scheme, and if no one is actively promoting something, your words are pure fantasy. You cannot do it by building the houses out for friendly bricks.

( sent previously) Policy 2.1 City Centre - Item 8 - WHS

For example, we are very concerned to see that this policy only envisages the need to avoid **substantial harm** to the World Heritage Site. This is quite unacceptable as a general position and while it satisfies the letter of NPPF 206 (b) we are quite disturbed to see that CCC as the custodian of a such and important heritage portfolio, should apparently be quite happy to countenance minor harm to WHS assets.

206. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional<sup>72</sup>.



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