

CANTERBURY CITY COUNCIL LOCAL PLAN 2040

Comments from T Bentley, [REDACTED]

I have lived in Blean since [REDACTED] and have a number of concerns about the Local Plan 2040. These are:

1. Page 15: development strategy for the district: 1.44

Section 1.44 states “taking account of the responses to previous consultations the plan also identifies land for a new settlement to the north of Canterbury”

I am unaware of any consultations having been made for a new settlement to the north of Canterbury. Could you please explain what these consultations have been, when they took place and what proportion of people living in Blean, Tyler Hill and Rough Common villages took part in these consultations?

2. Climate change action

While I can agree with the strategic objective for the district (**defined on page 9 of the Local Plan 2040**) that there is a need to “reduce the causes of climate change and adapt to ensure all district developments enabled carbon emissions reduction and increased resilience as quickly as possible” the idea that all the benefits from those district reductions will be retained within the Canterbury district is difficult to believe. Climate change is a world-wide problem that requires world-wide action. Canterbury district should certainly be playing its part in that action, but its contribution to world-wide issues should not be overstated. There are two main areas where the response to the climate change problem within the Local Plan 2040 appears inadequate:

- 1) There is no mention within the plan that the coastal part of the district is under threat from subsidence. This issue has been presented within the British Geological Survey. My attention was drawn to this by an article in The Economist published on April 13, 2024. This focussed on the subsidence already apparent in London where two-fifths of London’s housing stock (1.8 million homes) will be susceptible to subsidence by 2030. This arises because houses there are built on London clay, a material that expands when rainfall is heavy and contracts with high heat levels. This constant change in shape causes footings to buckle and twist, leading to subsidence. PWC, a management consultancy, predicts British home insurers will soon be paying £1.9bn per year in subsidence costs. The Canterbury district will not be immune from subsidence since much of it has been built on a London clay base. The whole economics of housebuilding is likely to change. Any building sites within the area between Whitstable and north Canterbury should be removed from any local plan until the overall stability of the district’s London clay land has been investigated.

- 2) The section on Energy within Climate Change (**CDLP2040-CC05 Energy paper**) focusses on the district's air pollution and in consequence does not deal with the carbon emissions that arise because of the production of nitrates and phosphates that are used extensively by farmers in the Canterbury district. However, the impact of the use of these fertilisers shows itself as a contributor to the high levels of pollution at the Stodmarsh lakes. It is not simply the failure of the Canterbury Wastewater Treatment Works (WwTW) to cope with sewage that creates high levels of water pollution. Farm use of nitrates and phosphates impacts this problem as well. There appears to be a problem comprehending that both sewage and water run off from fields are part of the same pollution as demonstrated in the following example:

One of the reasons that ensured the granting of planning permission by the Planning Inspectorate, for 85 houses on land at Blean Common adjacent to the Royal Oak, was that the application included the installation of a site-based water treatment plant and the transfer of clean water via a stream to a discharge point at Swalecliffe.

However, since that permission was granted, the developer, Gladman, has suggested, in CA/24/00234, that an alternative method of dealing with sewage from the site would be to send the site effluent directly to the Canterbury WwTW with that additional effluent volume being offset by setting aside 28ha land under the control of the sponsors of the project, so that the effluent outputs from both approaches offset each other.

Given that a housing site is going to produce effluent at a steady rate each day whereas nitrates and phosphates will only leach from a field when field drains become active, following rainfall, there is no logic in this proposal. However, in the meantime the existing effluent pipework will continue to overflow, because the pipework is inadequate for the existing effluent volumes, let alone the effluent volumes coming from a further 85 houses.

It is encouraging that the effluent coming from the 2000 homes to the north of Canterbury will be treated on site but everyone should be aware that following a series of sewage leakages into houses and gardens in the Chapel Lane to Tyler Hill Road area there is considerable sensitivity towards the whole question of drainage from inadequate infrastructure from Blean residents.

3 District Road network (Policy C.12.4)

If the Local Plan 2040 is approved there is a strong possibility that major roads will grind to a halt, simply because there is inadequate capacity for existing traffic. A good example of this situation can be found in Blean, where there has been minimal village housing

development in the last few years, but where there has been large increase in traffic volume. This arises from commercial development at Estuary View, Whitstable together with housing development in that area as well as from newer housing development along the old Thanet Way.

Unlike KCC Highways that measures road usage on a 24-hour basis, I take the view that what really matters is the volume and speed of traffic when people are likely to be out and about from their homes. I was given access to a KCC Highways detailed spreadsheet that identified traffic volumes and speeds by vehicle type in 2017. From this it was relatively easy to show that during the period from 7am to 7pm each workday, the A290 in Blean carried 4406 vehicles travelling north and 4544 vehicles travelling south. That means that on average 6 vehicles go through the village in each direction **each minute** during working hours. That makes road crossing for elderly people in particular very difficult, particularly since the footways in the Blean Common area are either too narrow or are non-existent!

7 years on from the date the vehicle data were collected, the impression is that vehicle volumes have increased probably because of the extended commercial outlets adjacent to Estuary View, Whitstable and as a result of additional housing in the Whitstable area.

The proposed addition of a further 2000 houses together with commercial buildings on University of Kent land is bound to increase the volume of vehicles on the A290 to the detriment of those living in Blean or Rough Common. The entrances suggested for what is described as a stand-alone development appear inadequate and the suggestion that the traffic flow in both directions onto Tyler Hill Road will be minimised comes with no suggestion as to how this will be done. Tyler Hill Road is far too narrow and winding for the current volume of traffic and the potential for altering that situation is minimal. At Rough Common the development of an 'all-purpose junction with the A2 at Harbledown' is bound to have an impact on traffic volumes on Rough Common Road and the A290.

A major development adjacent to the Canterbury City Council's border with Faversham, where a large housing development is planned by the Duchy of Cornwall does not appear to have been taken into consideration for its impact on traffic volumes. Indeed, it appears that the traffic impact assessment awaits the analysis of the building works proposed in the Local Plans for each of the districts that report through Kent County Council. This lack of coordination shows that as a stand-alone document, the Local Plan 2040 from Canterbury City Council lacks credibility.

There are 6 A roads that funnel traffic in and out of Canterbury but no real-time regular reporting to enable traffic flows by groups that need

this information, such as KCC Highways, Kent Police, District or Parish Councils. Instead of a proper system, reliance is placed on irregular traffic monitoring by Speed Watch volunteers, static speed cameras, Police vans and special strips across roads, producing poorly designed Excel spread sheets. There are many new systems that can make use of ANPR technology that can provide the management system required while also recovering the cost of change via speeding, lack of insurance or road tax fines. Canterbury District should be seen to manage its Local Plan 2040 with road and traffic strategies that provide relevant and timely information to ensure that grid lock is avoided and its residents kept safe

4 Summary

- a.** Consultation on the proposed development at the University of Kent has not taken place in the way described in the Development Strategy. (1)
- b.** No analysis of soil structure, in particular the London clay deposits, has been undertaken of the University of Kent's landholding to ensure these will provide an adequate life for the buildings proposed. (2.1) The risk of subsidence for this development is high and potentially higher in the coastal areas of the district.
- c.** Inadequate attention has been paid to the pollution levels at Stodmarsh lakes that are caused not only by an inadequate WwTW at Canterbury but also by excessive run off from fields that contain nitrates and phosphates. No attention has been paid to the carbon release at the fertiliser manufacturing sites. Improvement of the overall district drainage infrastructure is essential. (2.2)
- d.** The District Plans are being developed without coordination with the traffic impact study, something that is the responsibility of Kent Highways (3). The likelihood of grid lock from the current approach to traffic planning is too high, yet there are solutions available to resolve this issue.

Overall, as currently presented, the Local Plan 2040 for the Canterbury District is not fit for purpose, with a major re-think being necessary.