

Mr. David McGoldrick

Sent via email to: consultation@canterby.gov.uk

Canterbury City Council
Military Road
Canterbury
CT11 1YW

June 3rd, 2024

RE: Canterbury Local Plan 2040 consultation response.

To whom it may concern,

I have reviewed the Draft Canterbury Local Plan 2040 put forward for consultation and understand the importance of the community adopting a Local Plan to empower local government and to prevent one being imposed by central government. I therefore want to put forward my considered response in this letter.

I support the councils objectives of:

- Reducing the impact on climate change, support protecting the environment and boosting biodiversity.
- Prioritising brownfield development sites.
- A transport strategy that focuses on better bus services as well as the promotion of walking and cycling. Improving the local transport network to improve air quality.
- Maintaining the character of rural settlements through sensitive growth.

I believe the inclusion of Policy R5 – Bread and Cheese Field in the Draft Local Plan 2024 conflicts with the above objectives. I summarise these conflicts as follows:

The Bread and Cheese Field is a greenfield site. It is the only greenfield site between Hersden and Westbere. Development of this site will impact the character of these two rural settlements. I believe development priority should be given to other brownfield sites in the district.

The Draft Local Plan 2024 states;

“Planning permission will be granted for development which meets the following criteria...the design and layout of the site should... not result in coalescence between Hersden and Westbere.”

Any development to this greenfield site would naturally result in the coalescence of Hersden and Westbere. The field is of significant historic importance to the village of Westbere, with a charitable history that can be traced back over 300 years and is still continuing today (see Community Governance Review – Westbere and Hersden parish Boundary). On the basis that I support the councils objectives of maintaining the character of rural settlements I object to the inclusion of Policy R5 – Bread and Cheese Field in the Draft Local Plan 2024.

The Draft Local Plan 2024 states;

“Planning permission will be granted for development which meets the following criteria...the design and layout of the site should... provide 20% biodiversity net gain.”

It is not clear how the development of a greenfield site will improve biodiversity by 20%.

According to a report published by the National Audit Office (NAO) on 17 May 2024 titled “Implementing statutory biodiversity net gain”, there are serious operational shortcomings for the central government’s scheme to achieve 10% biodiversity gains. How then Canterbury City Council intend to achieve a 20% biodiversity net gain (BNG) is not clear.

I summarise the points of concern raised by the NAO:

- Department for Environment, Food and Rural Affairs (DEFRA) is still developing its post-launch governance arrangements, and the outcomes from its policy will ultimately rely on organisations outside central government over which DEFRA has limited influence.
- The discretionary nature of local authority planning enforcement means that there are compliance and enforcement risks.
- DEFRA is relying on a market for biodiversity units emerging, but does not know how rapidly this market can scale up, or whether the market can satisfy demand.
- DEFRA does not yet have a mechanism to spend income from statutory credit sales to enhance biodiversity.
- DEFRA does not yet have access to all the information that it will need to understand how well statutory BNG is working.

This criticism is further supported by Brian Berry, chief executive of the Federation of Master Builders, in an article published by The Construction Enquirer, he states:

“The NAO’s criticism of DEFRA, for having failed to put all necessary elements in place ahead of launch of the BNG scheme echoes the concerns that were raised by small house builders at the time. The lack of involvement DEFRA has in the biodiversity credit market is also extremely worrying, especially as smaller builders are more likely to need to offset biodiversity offsite. Unless these issues are addressed, BNG will create substantial barriers to small house builders.”

On the basis that I support the councils objectives of reducing the impact on climate change, support protecting the environment and boosting biodiversity I object to the inclusion of Policy R5 – Bread and Cheese Field in the Draft Local Plan 2024.

The council has set out a clear objective of improving local transport and improving air quality to residents. This objective is further supported by the “Options Consultation (2021)” whereby 60.4% of respondents supported improving the local transport network to improve air quality.

Further ribbon development along the A28 is in stark contrast of this objective. The A28 is already heavily congested. On the northern approach to the Sturry Level crossing it is effectively a one way road with parked cars occupying one lane of travel. There is no scope to improve Bus infrastructure in this location. The obvious impact of adding 150 houses to the Bread and Cheese field will be further traffic along this route. There has already been a pedestrian fatality this year due to traffic in the area. Pedestrian footpaths leading from Westbere to Sturry are narrow and vegetation in parts

forces walkers onto the busy road. Increased traffic is not good for the safety of residents or the air quality.

On the basis that I support the councils objectives of a transport strategy that focuses on better bus services as well as the promotion of walking and cycling, support protecting the environment and boosting biodiversity I object to the inclusion of Policy R5 – Bread and Cheese Field in the Draft Local Plan 2024.

I support my fellow residents who responded to the Options Consultation (2024), there was strong disagreement on the principle of planning for more than the minimum number of homes as set out by the targets set by central government. According to a recent report by the Alliance of Canterbury Residents Association (ACRA), Canterbury City Council has grossly over-stated the population growth for the area, and, therefore the demand for houses.

The current status of the Bread and Cheese Field lying dormant as nonproductive farmland is a terrible indictment of Land Agents advising land owners to bank land in anticipation of future speculative development. The council has already removed the proposed new settlement at Cooting Farm near Adisham where Land Agents were advising the council contrary to the Landowner's and local residents wishes.

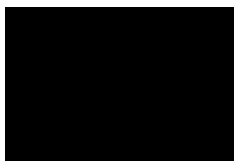
On this basis and the others detailed in this letter I object to the inclusion of Policy R5 – Bread and Cheese Field in the Draft Local Plan 2024.

I support the work the council is doing with regard to the proposed station upgrade and re-signalling at Sturry Train Station.

I support the investment in the Westbere Marshes as part of the Open Spaces Strategy.

I support the Sturry Link Road Scheme that includes a crossing to both the railway and the Great Stour river.

Warm Regards,



David McGoldrick
Canterbury Resident

