

Draft Canterbury District Local Plan to 2040

(Regulation 18) Consultation 2024

Response from:

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Resident of Canterbury District since ██████

General Concerns about the Plan

1. Exceptional circumstances: why won't CCC consider that Canterbury District has exceptional circumstances which would allow it to deviate from the standard method of calculating housing numbers

It is clear that officers are advising Council members and the public that there are definitely no exceptional circumstances that would enable the district to deviate from the standard method. Residents who raised this point at the recent consultation meeting that I attended were told that the Housing Needs Assessment (HNA) undertaken by Edge Analytics has covered this point and ruled it out. But I cannot see how this can be the case. The 2021 HNA which considered the case for exceptional circumstance was undertaken BEFORE the 2023 changes to the NPPF and the release of new Census data. It was also conducted BEFORE the ONS recognised that its approach to student population calculations was flawed.

The new wording of NPPF paragraph 61 now states that the outcome of the standard method is an advisory starting-point for setting housing need for the area and that there may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach. The consultation document on this proposed change explicitly stated that student populations was an example that could constitute exceptional circumstances.

Other councils seem happy to investigate whether exceptional circumstances might apply in their districts, rather than just ruling it out. Swale Borough Council has recently gone out to tender for a consultant to specifically investigate whether exceptional circumstances apply.

Wolverhampton District Council, South Staffordshire District Council, Epsom and Ewell Borough Council and Bournemouth, Christchurch and Poole Council have all put forward Local Plans citing exceptional circumstances allowing them to deviate from the Standard Method.

It seems clear that it is a mistake to push ahead with this Local Plan without even questioning the standard method now that the NPPF confirms that this is an advisory starting point only. Pressing ahead without evidence will only lead to delays and challenges later in the process.

2. Constraints on house building in Canterbury district

Even if CCC does conclude that there aren't any exceptional circumstances that apply, they should still assess whether there is enough capacity in the district to meet the Standard Method advisory starting point.

So much of the district is taken up with AONB, SSSI, woodland, flood plains and nature reserves that there is not enough capacity to build housing at the level set out in the Draft Local Plan. The district is further constrained by the coast and the historic city of Canterbury. It just isn't possible to reach the Standard Method target without an unacceptable concentration of development in the parts of the district that can be developed.

3. Setting an undeliverable housing target will lead to the district going into presumption

Officers are wrong to assure elected Councillors and members of the public that getting a plan in place by the 2025 deadline means that they will regain control of planning in the district.

Housebuilders will only build at a rate at which they can sell. Historically this has never been anywhere near the Standard Method Target.

Setting an undeliverable housing target means setting this plan up to fail. Failure to deliver the target number of houses will mean failure of the Housing Delivery Test and therefore the continued threat of unplanned and undesirable development.

4. Rural policies

The current adopted Local Plan (2017) contained several excellent 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 2017 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.

SPECIFIC POLICIES IN THE PLAN

Chapter 1: Spatial Strategy for the district

Policy SS1 – Environmental Strategy for the district. I strongly object to this policy as currently worded.

Point 9 states that “Large scale renewable power generation applications will be encouraged, in line with Policy DS25”.

I strongly object to this wording which 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.

Renewable energy has an important part to play in tackling the climate crisis. But any development must be in the right location and of a suitable scale. Encouraging large scale developments, rather than for example several small developments, is a terrible mistake.

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. Solar developers are backed by huge financial corporations and will not hesitate to take CCC to appeal. That is why properly thought-out policies are needed now as part of the Local Plan.

Solar farms are incredibly noisy (see [Do solar farms make any noise? - CPRE Hertfordshire \(cpreherts.org.uk\)](https://cpreherts.org.uk)) particularly large-scale installations. The increasingly large battery storage facilities that accompany them are now widely recognised as a serious fire risk. There is no recognition of these risks to rural residents in the current draft. Large scale solar farms and battery storage facilities should not be near people's homes.

Chapter 6: District-wide Strategic Policies

Policy DS12 Rural Economy. I object to this policy as currently worded.

Point 1 of **Policy DS12** says that the council will take a "positive approach" to rural diversification. Rural diversification is defined on page 251-252 of Appendix 1: Glossary as "branching out from traditional farming activities, for example new income generating enterprise like renewable energy".

I strongly object to CCC taking a "positive approach" to farmers switching out of food production to install large scale energy generation equipment on the best and most versatile agricultural land. We will not solve the climate crisis by creating a food security crisis. CCC should be supporting farmers to diversify in ways that can run alongside food production, not replace it.

Policy DS19 Habitats, landscapes and sites of local importance. I object to this policy as currently worded.

Point 3 of **Policy DS19** should be amended to give greater protection to landscapes of local importance. The current wording of point 3 only refers to developments actually **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.

Point 3 (landscapes of local importance) should also include similar wording as Point 1 (Local Wildlife Sites etc) to say that "proposals for development will only be permitted where they are not likely to have an adverse effect, **either directly or indirectly**, on Local Landscape Designation areas".

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) of the Wantsum Channel 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.

The current wording of Policy DS19 would not be sufficient to protect this important and unique valley.

Policy DS25 Renewable energy and carbon sequestration I strongly object to this policy as currently worded. Point 1 states that “**significant weight**” will be given to “the carbon emissions reduction and energy resilience that the projects can deliver”.

I strongly object to this wording as it will make it very difficult to resist the large-scale industrialisation of the countryside with detrimental effects to the rural landscape, wildlife and residents.

The projects which will deliver the biggest amount of energy will obviously be the very biggest energy installations that will cover the largest area of the countryside.

Policy DS25 says proposals for renewable energy projects “will be supported where this aligns with other policies in the plan”. I understand that this is where officers hope to mitigate any damage to landscape, amenity, heritage, wildlife and loss of best and most versatile agricultural land. However, I 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 in appropriate places.

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.

The word “significant” should be removed from **DS25** and the list of protections currently given by **Policy DBE2** be reinstated into the body of **Policy DS25**.

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 Parish Councils of both 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.

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.