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From: Ashley Clark [REDACTED]
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Dear Victoria,

Please find my response below. You may assume I object to the Blean and Brookland Farm development.

Best wishes

Ashley

Local Plan Observations.

I make comment based on 12 years experience as a ward councillor (10 as vice chair of the Planning Committee), former cabinet member for open spaces and enforcement and the Secretary of the voluntary group that manages in partnership with the Council what is believed to be England's largest Village Green - the award winning Gorrell Valley Nature Reserve at Whitstable (18 successive Green Flag Awards to date).

This is a daunting and thankless task indeed for any planner. Whilst there are areas of merit that have continued from the previous plan I find here huge gaps that affect the quality of life for all of us in the district and these have been either glossed over or ignored.

Tempting though it might be to nit pick I shall keep this broad brush. The plan has been driven by a history of central government diktats as to housing need and numbers. It is underwritten by the National Planning Policy Framework which has been crafted in such a way that it can be applied so flexibly so as to become meaningless with those involved in planning enquiries taking the parts they like, ignoring the parts they don't and exploiting the many omissions like a lack of any policy relating to food security, the importance of farm land and any prescriptive requirement as to the treatment of wastewater. Against this we have a background of a totally underfunded Environment Agency stripped of effective enforcement capability and a situation where the party of government has received millions in donations from developers - a clear conflict of interest if ever there was. The evidence of need for housing is erroneous because it is not seen against a declining birth rate (1.49 per woman in 2022 NB Men at the current time do not have babies) which represents less than a population replacement figure and the fact that the majority of those taking up housing here are newcomers from elsewhere (mainly London). Our planners clearly are unable to differentiate between need and demand. The only inference from this is that local plans exist merely to satisfy the ambitions of the developers. The only real local need relates to the housing list and that is for affordable housing. That which is affordable is usually unaffordable. Affordable housing represents less than 30% of new builds in this district.

In 1960 the population of Whitstable was 17k. Since that time that population has doubled. The population of the UK has increased by less than 30% so we are taking more than our fair share in this already overcrowded area.

Since 1960 we have had no increase in wastewater treatment plants and we have a situation where in this district hundreds of unlawful sewage releases are taking place annually into the sea where tourists swim and come to consume the shellfish.(The law only allows releases in exceptional rainfall, not every time it rains) The response by Southern Water has been to construct a new longer pipeline to take untreated sewage further out to sea so as to allow the tide to wash it in again. A buoy measuring pollutants has been placed at Tankerton in the knowledge that the currents and tides wash the sewage in an easterly direction with no buoy planned for Hampton east of the release point. A new reservoir is mentioned in the plan as it was over forty years ago but nothing materialised. On examination of the plan I can find no prescriptive requirement for a new major waste water plant only a reference to a strategic wetland that so low in detail as to indicate that no deep thought has been given as to how this might work and how the vegetation taking up the pollutants will be dealt with over time. This smacks of a throwaway paragraph merely to get the plan through. I do find mention at p.56 on the Blean proposal that " Wastewater treatment works should be delivered at the earliest possible stage in the development" The word "should" is advisory and poles apart from the word "must". It is not tied to a specific number of homes like the primary school handover mentioned in the same section. Elsewhere at p 187 it states " Proposals for 150-300 homes must examine (NB Not install) all available opportunities for integrating high quality on site regulated wastewater treatment". With small wastewater plants scattered across the district it is easy to guess where any affordable housing will go. Nobody is going to pay in excess of £500 k to live next to the pong.

Unlike in Stalin's Russia this plan involves no governmental selection as to the optimum placing of housing. It remains the choice of the developer so the planner's role is to limit damage and reject the worst sites. Indeed this was the case with the previous council administration that discounted the Blean proposal. I see it is now back in the plan due to the numbers requirement and this renders the whole notion of a positive plan as a complete fallacy. According to the Ministerial forward of the initial NPPF sustainable development means "ensuring better lives for ourselves doesn't mean worse lives for future generations" Planning is supposed to exist to protect the public interest.

The Blean is the one area that gives me the greatest concern. We read in the plan of the environmental strategy to “ support the extension of and improved connectivity of the Blean Woodland complex” . It has been long established that the greatest threat to animal species is habitat loss coupled with population pressure with footfall and increased traffic. This plan puts the ancient Blean in a pincer movement between the Blean development of 2,000 houses and the Brookland Farm development of 1,800 houses. Agricultural land will cease to exist. Wildlife corridors and hedgerows will be destroyed and the road to Tyler Hill which serves as an overused rat run will now serve as a wildlife kill zone cutting the Blean in half with no provision for wildlife bridges or tunnels. Any notions of pedestrian routes and cycle routes represent no more than a sop to get the plan through. The realpolitik of the situation is that people will not give up their cars to cough and splutter in confined public transport or ride bicycles through the freezing January rain. The huge increase in traffic volumes will also devastate Rough Common in terms of quality of life for residents.

In respect of the Brookland site there is mention of wildlife corridors across to Benacre Wood. Have those who prepared this document ever been there? Despite a TPO the southerly part of this divided ancient woodland it has been destroyed by persons living nearby who have allowed horses in there destroying many of the ancient oaks and the bluebells. The rest of Benacre Wood north of the Thanet Way forms part of the Gorrell Valley Nature Reserve which my team manages and this continues to thrive but there is no connectivity because of the road with no wildlife bridges or tunnels. The development south of the Thanet Way with permission approved despite Councillor opposition has provided no similar undertaking and this clearly illustrates that throughout the plan all this talk of wildlife corridors is nothing more than aspirational bunk. One was provided some years ago on the new Thanet Way but that was to accommodate the Chestfield golfers. The reality is that many developments will claim gains for biodiversity but ignores the fact that the ecologists are paid by the developer and once the plans are in they are never seen again.

Mention is made in the draft of green gaps but the proposals for the Blean, Brookland and Bodkin Farm will only serve to erode those gaps.

One area of the plan that is encouraging is DS 24 paragraph 6 which speaks of a requirement to protect land with village green or fields in trust designation when provided as open space with developments. This is long overdue in respect of policy although in my time at the Council I was instrumental in pushing this through at a number of developments and in respect of Council owned land. All too often recreational and semi natural land has been provided with developments but future protection of the land was ignored leading to uncertainty for residents. If we are to have development and there are some good schemes then this type of provision is an absolute must. I remain disappointed by paragraph 7 which only talks of provision for management of the land in perpetuity with developments of 300 - 1,000 houses. Smaller developments would provide a few hectares of open space and the establishment of a Council endowment fund to manage these sites in terms of some control of vegetation and litter provision has to be paid for. Management companies bleed residents and often fail to live up to expectations.

In summary, in its present form and with the exceptions mentioned above this plan fails. It lacks firm prescription in respect of infrastructure for waste water, solar panels on new builds and industrial units, and the national urgency for food security. It falsifies need in respect of the majority of housing. It contradicts itself in that some of the sites proposed will have a devastating effect on biodiversity and traffic congestion. In trying to satisfy so many requirements it inevitably fails on detail. What we are left with is a craven surrender document to the private commercial interests of developers and a University that appears to have forgotten about the noble reasons for its very existence. Regrettably it betrays both the public, local community and national interests.

Ashley J Clark
Alderman of the city of Canterbury

Sent from my iPad