



CCC Consultations <consultations@canterbury.gov.uk>

Local Plan Consultation

1 message

Ross Evans [REDACTED]
To: consultations@canterbury.gov.uk

15 January 2023 at 21:22

Dear Policy & Strategy Team,

I am writing to express my feedback on certain elements of the Draft Local Plan as part of the current consultation phase.

I am a resident of Canterbury and in particular of Wincheap. The main area I have focussed my attention is the proposal for the Merton Park development detailed in section C6 of the draft local plan. Firstly, I express my concern at the size of this development which will radically alter the character of the area. A very large area of greenspace will be removed from public use and a great deal of wildlife displaced. I have an allotment at the existing Wincheap site and I have specific concerns with regard to how the proposal will impact upon the area. We have witnessed a number of thefts over recent years and an increased number of houses and inhabitants in the area needs to be considered. The area surrounding the allotment site where much of the proposed development will be is hillsides and the water run-off directs towards the allotments. Already, the drain which can be found at the end of Norfolk Rd is frequently blocked and in wet weather a route of water can easily be seen running from the allotment site towards this drain. The whole of Wincheap has in recent years seen a greater incidence of being unable to cope with excessive rainfall and areas such as Tudor Rd and York Rd are already listed as being in a flood risk zone. Currently, from Zealand Rd downwards the run-off in heavy rain quickly accumulates and runs down towards the lower sections. If this Merton Park development goes ahead then serious consideration must be given to the impact of losing such a large area of greenspace and the additional flood risk that this will create by creating a larger area of impermeable surfaces.

I welcome the suggestion of creating 74 new allotments in the area should the development gain consent although I believe this number to be far too little to adequately fulfil the increasing demand for allotments. Moreover, this happening at a time when food security is such a pertinent issue. In addition to the loss of a considerable area of agricultural land for this proposed development it would bring even more people into the area, a percentage of these will surely need to be able to access their statutory right to an allotment.

I express my concern at the potential for a large negative impact upon the biodiversity of this area. The area at the former Chalk Pit at the top of Lime Kiln Rd and between Stuppington Lane is a recognised stronghold for reptiles in the area. The proposed development would not only segment this area but would remove any surrounding land into which reptiles might otherwise be moving. Every year there are large populations of migratory birds which will often come from the colder regions of Eastern Europe and feed upon the unpicked apple harvest in the orchards. There are a number of raptors also present in the area. Hedgerows between the orchards and all around the proposed development site are a key habitat for nesting birds and there are frequent charms of goldfinches spotted in the area.

I fully welcome the commitment from the council in this draft plan for future housing in the region to be built to Passivhaus standard as indicated in Policy DS6 - Sustainable Design. However, I seriously question the feasibility of achieving this goal on such a large scale given that there is no existing track record of the council or of housing developers in the area working to this standard. At present I am the only qualified Passivhaus Tradesperson in Kent which gives some indication of the existing skills gap to achieve such an ambitious project. I also work in the retrofit sector and am well aware that there is no existing capacity to deliver retrofit of the existing housing stock in the district at the pace and scale at which it needs to be done for the UK to achieve its legally binding commitments to reduce carbon emissions. In light of this I find it incredible that the district would be pursuing new developments in the area before developing capacity and investing in the need to reduce the energy consumption of the existing housing stock. I would welcome the notion that this development might act as a stimulus to create more local jobs in building to Passivhaus standard but the reality at this point in time is that we must reduce emissions from existing buildings before considering adding even more buildings. Net-zero is mentioned in Policy DS6 but this is an incredibly complex target and not something which can realistically be achieved through developments of this scale. Even with the existing housing stock of the UK undergoing a considerable programme of retrofit (which is not currently happening) we are still not on target to be able to heat those buildings with a decarbonised grid in line with current targets. Adding more buildings to this number is only going to overload the grid even further and in a densely populated region such as the South East of England this problem will be felt even more acutely.

I thank you for giving your time to consider my comments and look forward to hearing more in the future as the local plan continues to develop.

Warmest regards,

Ross Evans

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Ross Evans

Certified Passivhaus Tradesperson
AECB CarbonLite Retrofit Graduate

