

Draft Local Plan to 2045 - TWRA Comments

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Summary

This is a representation from the Thanet Way Residents Association (TWRA) in which we demonstrate that the proposed developments of W7 and W6 will be profoundly harmful to south Whitstable because it will result in a negative step change to the open plan, semi-rural character of this setting, enjoyed, appreciated and valued by folks who live here. We demonstrate that i) this scheme is at odds with the successful planning philosophy, adopted by CCC over successive local plans, resulting in the A299 Whitstable Bypass in conjunction with the open plan character of the area we have enjoyed since, ii) that these policies have been based on solid foundations predicated on the amenity value of fringe open land inside and outside the urban boundary iii) that the loss of the open space resulting from W7 and W6 will be manifestly harmful because it would cause serious environmental harm to the locality and run counter to the historic protection of this important area of open land. Local residents are also mortified by the scale of the developments proposed, particularly given that this vicinity of Whitstable has already absorbed all major Whitstable developments over the course of the last two local plans (250 Swalepark, 400 Whitstable Heights).

We raise concerns about waste capacity in Whitstable and provide evidence to dispel the myth that Southern Water releases of sewage, is attributed to storm overflows, given that these releases continued frequently during the extremely dry spells in 2022. We also offer suggestions to tighten some aspects of the planning process which we feel would be in the public interest.

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The TWRA

Very briefly we formed in 2011, and our focus is the ½ mile radius of the Whitstable Tesco roundabout. We are a mixed group of households with a membership of about 180.

Profound Step Change to Open Plan Character

Along the Thanet Way, A2990 from Benacre Woods to Chesfield are areas of good quality open land and farmland inside and outside the urban boundary that has been considered by the council to make an important contribution to the quality of the area for the last circa 30 years. This is because of the positive effects of this land providing visual amenity and defining the open plan character of the area.

Collectively these areas of farmland and pockets of natural environment on the urban boundary fringe, have coherence and collectively are impactful for good reasons. That is because each of these sites forms a significant and prominent link in a wider chain, which establishes a pattern along the road in particular from Benacre Woods to Chesfield, and which forms the pleasant open character of this area that is highly appreciated, enjoyed and valued by local residents.

Remarkably even though this is a very busy urban setting, with residential, retail, and industrial activities, and with the challenges of a major highway running through the middle of it, the combined effect of these elements of open open land dramatically soften the landscape and appearance of the whole area, producing an almost semi-rural characteristic, central to the quality of this setting.

This truly is visual amenity in action and makes a real difference to the health,of this human habitat.

In addition to softening the landscape the value of these areas of both open farm land pockets of natural environment as a green-lung cannot be overestimated in this particular location. They offer relief from the harsh adverse effects of the busy Thanet Way running right through the heart of this area. While these areas of green land provide an important function in mitigating the impact of that highway, they also provide an essential buffer to establish a valuable separation between the residential dwellings and the busy road. They also provide a natural environment for wildlife with connectivity across the sites.

However the loss of any of these individual sites would be particularly harmful because it would undermine their wider relationship to their adjoining sites, inevitably leading to the erosion of this continuous buffer and the pleasant open character they define.

It is not by chance that the land here has retained its open plan character.

It is easy to forget but when the new Whitstable and Herne ByPass was introduced, large areas of open land was consumed and part of that investment was to introduce new

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protection measures as part of a scheme, designed to prevent the Old Thanet Way from becoming as busy as it was before the new one was built. Indeed the state of the road in the 1990s on a regular basis could only be described as armageddon with stationary traffic and unwelcome pollution along the stretch of this road.

So when the new Whitstable Bypass was introduced, planning policies were established to:

- i) protect the visual amenity and open plan character of the area.
- ii) protect the Old Thanet Way from becoming as busy as it was before the road was built
- iii) take positive advantage of the road's altered status for amenity value.

The contribution of these open areas to the vicinity is described in the original background policy Technical Paper 3 Landscape Conservation and Open Space (1994) shown here.

Note that the 'Study Area' being alluded to is the Old Thanet Way. The full relevant sections of planning policy are in Appendix A.

- ... Thanet Way ... course to rejoin the Thanet Way at Eddington Roundabout.
- Amenity Importance of the Study Area and Policy Implications**
- 5.9 The study area has a vital role in providing the landscape setting of the coastal towns and their associated settlements (see Appendix 7). It also acts as a recreational resource, being the closest open countryside to these towns.
- 5.10 Because of the amenity importance, both visual and recreational, it is vital to safeguard it from large scale expansion of development. The majority of the area is outside the urban boundary, there is therefore, a presumption against development of fresh land. Further detailed policy consequences are described below.
- 5.11 **Benacre Wood to Chestfield:** This is a predominantly open landscape, a wide valley from Benacre Wood to Chestfield. This extensive, open landscape is therefore very vulnerable to the impact of new development. Parts of this area also form the setting to the Blean Woods SLA complex. It is an attractive landscape and has a rural character worthy of conservation. It is vital to the setting of south Whitstable and Chestfield and is an area valued for the public access it provides for the adjacent urban population. **Canterbury District Local Plan Deposit Draft Proposals:-**
- a) area identified as open space protection;
 - b) extension is also proposed to the Blean Woods SLA to the west and south of Chestfield to include the setting to the main woodland and pieces of outlier woodland - Convicts and Longtye Woods.

- 5.16 Any additional development along this road would also lead to extra traffic and highway accesses. Indeed any such additional traffic on the existing Thanet Way would eventually lead to calls for an upgrading of the road. This would therefore be contrary to the approved approach of diverting traffic onto the modern realigned A299. Apart from Canterbury District Local Plan Deposit Draft allocations, new development will therefore not normally be permitted accessing onto the Thanet Way.

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Since then subsequent protection measures have consistently been applied by CCC. In chronological order these are: Technical Paper 3 1994, C24 (2006), OS9 (2017). These policies explicitly applied protection only to the areas inside the urban boundary because of a presumption against development of land outside the urban boundary as stated in the paragraph 2, 5.10 above. However it is the combined contribution from the open land inside and just outside the urban boundary that underpins the policy for preserving the character and amenity of this area.

This scheme has indeed had a material positive effect on the traffic movements of the town, and in particular the south part of the town because new developments along this road would have led to additional traffic, congestion, and pollution. However at the time the new bypass was introduced, only 50% of the traffic was removed as the rest was local. If the traffic were allowed to reach these levels again, in part brought about by the human habitat would be much worse off because the open plan character would also have been lost to the major developments from W6, W7, and Whitstable Heights.

The TWRA welcomes the new policy DS19 clause 6 which recognises the value of the open land and natural environments inside the urban boundary only. The improved wording compared to OS9, and C24 should stop needless complex and expensive applications and planning appeals.

However, the two proposed developments W7 & W6 on the farmland south of the Thanet Way are fundamentally at odds with the planning philosophy predicated on the fringe land both inside and outside the urban boundary, that has resulted in the high quality open plan character and vital visual amenity of the area

This small area of south Whitstable has already had to absorb a number of major developments. The recent 250 homes on Swale Park that usurped the local plan, 400 homes on the Hyde Homes site that is entirely on arable land and still in early stages of development and the expansion of Golden Hill. One benefit of the Hyde Homes Whitstable Heights site is that it occupies lower land so the open views will not be as negatively impacted as the constructions on W7 & W6.

The proposed W7 and W6 are the most harmful part of the proposed Local Plan to Whitstable because this will produce a material negative step change to the vital visual amenity and open plan semi-rural character of this setting enjoyed, appreciated and valued by folks who live here. Moreover this is entirely at odds with the successful planning philosophy adopted for the last 30 years.

However W7 is by far the most damaging for the following reasons:

Firstly W7 will introduce for the first time on this highway, major development on both sides of the road which is at odds with development hitherto. Because the W7 is in a highly elevated position, the new constructions will stand out prominently, totally corrupting the

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views and appearance of the landscape experienced not just from the areas immediately surrounding the Old Thanet Way but also when viewing from the Whitstable town.

Secondly the property promoter is also advancing a Lidl supermarket on his site. A supermarket car park with lights on 24hrs a day on this elevated land will be the anathema of what has been accomplished with successful town planning until now. Indeed the good planning work established by the council since the new Whitstable ByPass was introduced will be totally destroyed.

The situation for W6 is also harmful in terms of the impact on the existing planning character of the area but has the advantage that the land opposite is undeveloped. However the park and bus again will be prominently displayed with lighting on 24hrs a day. The qualities and benefits of visual amenity provided by this landscape will not only be harmed but destroyed.

Returning to the issues of traffic on this part of the Old Thanet Way. While we are sure traffic surveys will show that the impact can be accommodated, local residents are not convinced by this. I live right by the Tesco roundabout and it regularly takes several minutes to get out of my house onto Millstrood Road and onto the Old Thanet Way because the Old Thanet Way and the roundabout is chocka. Traffic coming from the Herne Bay direction is a constant stream, and the traffic coming to and from the direction of Benacre is also very intensive. It has also become much worse over time. The 1200 homes on the Brooklands Farm development just behind the Tesco roundabout will also flow directly onto this road. Given that traffic flows already increase with time, it is all the more necessary to carefully control development to prevent the traffic levels on the Thanet Way becoming seriously congested. This is not just undesirable for road users and local residents, but also for the town as a whole because even more traffic, pollution and noise will spill into the residential roads such as Millstrood Road, Borstal Hill, Church Street and pinch points such as Belmont Road in the town as drivers seek new paths of least residence. It will be very impactful to Millstrood Road in particular the north part of the road which is entirely residential.

This image provides an illustration of the traffic volumes on the Old Thanet Way in this proximity.

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The virtues of site W6 as a Park and Bus arrangement are not convincing. The bus services here to Whitstable have always been sparsely provided even though there have been repeated calls for a fit for purpose provision of a bus service. For visitors coming from out of town for the day, parking and then waiting an hour for a bus and visa-versa seems unlikely to be successful. (See Appendix B for timetable). Many towns have the park and ride arrangement situated on the outskirts of the town. Whitstable is not really large enough to accommodate a park and bus scheme within its urban boundary. Such an arrangement also forces vehicles to come into the urban area and create more traffic on the Old Thanet Way and adjacent roads. Surely a site towards Graveney which does not bring traffic into an already busy area or consume the vital open land would be a more suitable and sustainable proposition.

Local residents have also voiced concerns about the inadequacy of the roundabout that was introduced as part of the Whitstable Heights development. Both the radius and lanes of this roundabout are too small, forcing drivers to assume an unusually acute path and invariably crossing lanes. Local residents cannot understand how such a poorly designed roundabout was approved to go ahead. There has already been an accident on it. Should W7 and W6 be approved with the park and bus scheme, the roundabout should be enhanced to be made fit for purpose.

The 2017 Local Plan had forecast a need for 16000 new dwellings in the district which was found to be sound. However the numbers for this new proposed Local Plan are now 31000. This is almost 100% more in a very close time proximity. Something appears to be amiss with these numbers. If 16000 was sound in 2017, how can the new number of 31000 also be found to be sound, they can't both be.

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Given that the government are no longer pushing ahead with the new housing targets that this proposed plan has been designed to accommodate, and given that the developments of W7 and W6 will have such a manifest negative impact that is fundamentally at odds with the planning philosophy (predicated on fringe land inside and outside the urban boundary), that gave us the new Whitstable Bypass in conjunction with the open plan character of this area. The TWRA feel that W7 and W6 should not be found to be sound on the grounds that it would cause serious environmental harm to the locality and run counter to the protection of this important area of open land.

Other Matters

Myth of Sewage Overflows caused by Storms

Turning to Sewage we want to dispel the myth advanced by Southeastern Water that sewage is released into the sea on the grounds of 'Storm Overflow'. You will recall that the southeast had an extremely and unusual dry period in 2022. We barely had a drop of rain in Whitstable in spring and early summer and the ground was dry and grass lawns struggling. However in that period Southeastern Water released storm overflows on almost a daily basis. The table below is a bite sized but typical extract that gives a sense of the myth that it is storms driving these releases. In the period covered in this table we didn't have storms and we didn't even have rain, yet sewage was released almost daily on the grounds of storm overflow. The same pattern can be observed across multiple months during this exceptional dry period and high temperatures.

Despite claims by Southeastern Water, there is something fundamentally wrong with capacity in this area. This table is just for Tankerton, which shows the frequency of 'storm overflows'. The Whitstable table has a similar release profile.

We ask that this fundamental infrastructure requirement is fixed as a matter of urgency before new developments come on line.

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Event ID	Site Number	Bathing Site	Outfall	Last Activation Start	Last Activation End	Duration (hrs)	Activity
422561	12548	TANKERTON	TANKERTON CIRCUS	17/06/2021 00:04	17/06/2021 01:16	1.2	Genuine
422421	12548	TANKERTON	TANKERTON CIRCUS	16/06/2021 22:21 PM	16/06/2021 23:17 PM	0.93	Genuine
422419	12548	TANKERTON	TANKERTON CIRCUS	16/06/2021 22:52 PM	16/06/2021 23:12 PM	0.33	Genuine
422276	12548	TANKERTON	TANKERTON CIRCUS	16/06/2021 21:42 PM	16/06/2021 22:05 PM	0.37	Genuine
422279	12548	TANKERTON	TANKERTON CIRCUS	16/06/2021 21:47 PM	16/06/2021 22:02 PM	0.25	Genuine
417011	12548	TANKERTON	SWALECLIFFE NO1	04/06/2021 22:42 PM	04/06/2021 23:17 PM	0.58	Genuine
416588	12548	TANKERTON	SWALECLIFFE NO1	04/06/2021 09:59	04/06/2021 22:39 PM	12.67	Genuine
416593	12548	TANKERTON	GORREL NO1	04/06/2021 10:20	04/06/2021 14:24 PM	4.05	Genuine
416748	12548	TANKERTON	TANKERTON CIRCUS	04/06/2021 12:39	04/06/2021 12:55	0.25	Genuine
416565	12548	TANKERTON	TANKERTON CIRCUS	04/06/2021 09:37	04/06/2021 10:10	0.55	Genuine
414179	12548	TANKERTON	SWALECLIFFE NO1	28/05/2021 01:48	28/05/2021 03:07	1.3	Genuine
414032	12548	TANKERTON	SWALECLIFFE NO1	27/05/2021 13:41 PM	27/05/2021 14:56 PM	1.23	Genuine
414025	12548	TANKERTON	SWALECLIFFE NO1	27/05/2021 13:17 PM	27/05/2021 13:34 PM	0.28	Genuine
411690	12548	TANKERTON	SWALECLIFFE NO1	24/05/2021 18:27 PM	24/05/2021 20:05 PM	1.62	Genuine
411597	12548	TANKERTON	SWALECLIFFE NO1	24/05/2021 14:41 PM	24/05/2021 15:50 PM	1.13	Genuine
411029	12548	TANKERTON	SWALECLIFFE NO1	23/05/2021 23:59 PM	24/05/2021 00:38	0.65	Genuine
410043	12548	TANKERTON	SWALECLIFFE NO1	22/05/2021 17:48 PM	22/05/2021 21:24 PM	3.6	Genuine
409826	12548	TANKERTON	SWALECLIFFE NO1	22/05/2021 07:15	22/05/2021 08:46	1.52	Genuine
409280	12548	TANKERTON	SWALECLIFFE NO1	20/05/2021 08:04	20/05/2021 09:11	1.12	Genuine
409258	12548	TANKERTON	SWALECLIFFE NO1	20/05/2021 07:10	20/05/2021 08:02	0.87	Genuine
408800	12548	TANKERTON	SWALECLIFFE NO1	19/05/2021 06:07	20/05/2021 02:00	19.87	Genuine
409086	12548	TANKERTON	TANKERTON CIRCUS	19/05/2021 18:01 PM	19/05/2021 18:27 PM	0.42	Genuine
408951	12548	TANKERTON	TANKERTON CIRCUS	19/05/2021 11:51	19/05/2021 12:07	0.27	Genuine
408786	12548	TANKERTON	GORREL NO1	19/05/2021 06:02	19/05/2021 09:25	3.37	Genuine
408785	12548	TANKERTON	TANKERTON CIRCUS	19/05/2021 05:58	19/05/2021 06:55	0.95	Genuine
408784	12548	TANKERTON	TANKERTON CIRCUS	19/05/2021 05:50	19/05/2021 06:45	0.92	Genuine
408413	12548	TANKERTON	SWALECLIFFE NO1	18/05/2021 13:31 PM	18/05/2021 21:45 PM	8.22	Genuine
408416	12548	TANKERTON	GORREL NO1	18/05/2021 13:37 PM	18/05/2021 15:14 PM	1.62	Genuine
408414	12548	TANKERTON	TANKERTON CIRCUS	18/05/2021 13:33 PM	18/05/2021 13:59 PM	0.42	Genuine
407761	12548	TANKERTON	SWALECLIFFE NO1	17/05/2021 15:51 PM	17/05/2021 23:18 PM	7.43	Genuine
407760	12548	TANKERTON	GORREL NO1	17/05/2021 15:51 PM	17/05/2021 18:28 PM	2.62	Genuine

AirBnB

We note that the Local Plan is seeking to address the problems caused by AirBnB and requiring planning applications for renting for more than 90 days a year. Residents in the TWRA have first hand experience of the loss of amenity in their homes and gardens caused by AirBnB arrangements in which the entire property is handed over to renters for a holiday or a fun weekend break. There are two problems. One is that holiday or weekend renters have a holiday mindset, naturally, and often make a lot of noise late into the late evening especially in the summer months in the garden. This in itself is no crime, but for the adjacent residents, they have to endure different groups of people every week/weekend. Often more than one family will squeeze into the accommodation. This has a profound negative impact on residents in close proximity so we request that the 90 day period is reduced to 30 days if possible. 90 days, we feel is too long because that is almost all of the summer. A few days here and there without a rental would drop the usage under the 90 day threshold. Instead we propose that a 30 day threshold of holiday renting should be sufficient to make an application and then for the council to assess the situation. Also, we feel, this restriction need only be applied to AirBnB arrangements when the holiday renters occupy the whole property. Arrangements in which a tenant takes a room in a house in which the owner is dwelling, does not cause these kinds of disturbance and so should be exempt from this.

Another evident problem that AirBnB is presenting is that owners of second homes are choosing to let out their properties for holiday lets rather than longer term residential renting.

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This is having a major impact at reducing the supply of rental properties as these properties are being taken out of the rental stock as well as the sales market.

Grubbing Up Before Wildlife Surveys

This is a practice we have noticed several times now in which developers, just prior to putting in an application, before wildlife survey is undertaken, destroy the land and/or remove hedges. However there are never any sanctions applied nor are these actions even considered in the application.

Eg: Original View of Land.



After the land was grubbed up before the wildlife survey

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Surely this makes a mockery of the planning process and measures should be in place to protect against this with sanctions enforced when this happens. Please can this be addressed in the new plan?

In a similar vein the TWRA would like to see commitments made by developers, fulfilled. We have observed that developers give guarantees that for example planting would be implemented as part of the development to improve the visual amenity. However this is not always implemented to any satisfactory standard or anywhere near to the level committed to in the application. If developers have not fulfilled their promises then measures should be enforced to encourage them to do this, such as not proceeding with new applications until the commitments are fulfilled.

W4 is Predicated on a Single Point of Failure

The whole philosophy of W4 {W5,S6,W7} is predicated on the east-bound-only slipway onto the A299 Whitstable Bypass. This slipway is being provided by the developer building the W5 Brooklands Farm development. While the W4 planning scheme is tightly coupled to a single developer, we have a single point of failure if that developer is unable to fulfil the commitment. Were this to happen it would be a disaster because all the increased traffic from the new developments would impact the Old Thanet Way. To mitigate this risk, the TWRA feel that the infrastructure must be provided early on in the evolution of W4 if it were to go ahead.

W5 Brooklands Farm Clustering of High Density In Whitstable Only

W5 clause e describes that:

“average net density of 35dph outside of the community hub. Higher density development will be encouraged in the western part of the site and within and around the community hub. Lower density development should be provided nearer to the Chestfield conservation area;”

This is at odds with the policy DS1 clause 6 that states that

“Affordable housing should be dispersed throughout the site, avoiding large clusters of affordable homes and integrated with the market housing.”

For a conurbation of the size, population and footprint of Chestfield, it is an anomaly that there are no higher density dwellings. As a very affluent area, in the interest of social integration it is essential that it is not just Whitstable that accommodates the higher density dwellings. Indeed in south Whitstable in this proximity there is already a disproportionate number of affordable high density dwellings such as the Swale Park development 250, Hyde Homes which we understand to be 41% W6, W7 targeting 30%.

We ask that DS1 is adhered to and the higher density dwellings are dispersed as per the policy.

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Food Security

It is remarkable that even though we have observed numerous global supply chain difficulties in the last few years around brexit, covid, the geopolitical tensions, energy, grain and cooking oil supplies as well as a tendency for countries to be more protectionist and inward looking, it is still considered perfectly fine to go ahead and build on food producing land. In the land within the proximity of policy W4, we have already lost the arable fields to 400 homes on the Hyde Homes estate, and we will lose the arable fields of W7, W6 and W5. Local residents are very concerned about what they consider to be a very dangerous strategy.

Schools Needed for Local Population Influx driven by new development

Whilst W4 and W8 are providing new school facilities, which is welcomed, by virtue of building 2000 additional new homes, additional school capacity is required anyway to accommodate the increased population brought about solely by the new developments. So the net benefit to meet the demand in Whitstable is likely to be negligible. The new schools will not be solving any existing problem, but rather solving the new problem that will get created through the expansion of Whitstable.

Strategic Relocations from Other Boroughs

The TWRA are very concerned about rumours that Lewisham Borough Council has snapped up 100 of the Whitstable Heights homes to alleviate their own difficulties by relocating people in their care to this area. While we do not propose that similar measures adopted in Cornwall and Devon to block individual prospective buyers from outside the area, we do feel that the industrial level block-purchase by another local authority should not be permitted as a planning condition.

Appendix A Technical Paper 3 Landscape, Nature, Conservation and Open Space

This contains the pertinent discussions regarding visual amenity and the open plan character of the fringe land of the Old Thanet Way (both inside and outside the urban boundary), which were the foundations for Canterbury Local Plan 2006 C4 Protection of Open Space, 2017 OS9 Protection of Open Space and Draft Local Plan to 2045 DS19.

Please see 4.15, 4.17, 4.18, and all of chapter 5 up to 5.16 except for 5.1, 5.13, 5.14

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changed and the reason for designating the SSSI no longer existed, the City Council would still want to retain this area as open space and resist development.

Part 2: The Canterbury District Local Plan Deposit Draft Approach

- 4.10 For the first time, the Canterbury District Local Plan Deposit Draft incorporates an open space protection strategy in addition to the allocation of specific areas for open space which are shown on the Proposals Map and are listed for information in Appendix 6. Important areas of open space can be formal or informal, large or small, and may be worthy of protection for their visual and/or recreational amenity. The open space protection approach applies to:
- i) open space that is important for **informal and formal recreation needs**; and
 - ii) open space that is important from a **visual amenity** point of view.
- 4.11 The exact boundaries of the open space protection sites are shown on the Proposals Map. The sites are listed and identified on key location plans 6, 7, 8 and 9 in Appendix 5.
- 4.12 Specific open spaces in villages and in the rural area have not been identified for several reasons. Firstly, there is a presumption against the release of fresh land in the countryside; secondly, the spatial relationships in rural villages are very varied and complex and vary from settlement to settlement. The emphasis in the villages is therefore on retaining the established settlement pattern in a village.
- 4.13 Finally, open space in villages is also protected by the general countryside conservation policies in the Kent Structure Plan (Third Review) Deposit Draft and the Rural and District Sections (including policies relating to the conservation of the built and natural environment where relevant) of the Canterbury District Local Plan Deposit Draft. Certain open spaces such as village greens and common land, are protected by their statutory designation (a list of village greens and common land accompanied by a location map can be found in Appendix 4).
- 4.14 The Canterbury District Local Plan Deposit Draft has looked at two distinct spatial areas: within the urban area and on the urban fringe which are discussed below.
- ### **The Urban Area**
- 4.15 Open spaces in the urban area make an important contribution to the quality of urban life and their loss is often irreversible. Undeveloped land which has recreational and/or visual amenity value should be protected by the planning

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system if it can be demonstrated that there is, or would be, a deficiency in open space in the area.

- 4.16 Open spaces or open areas on residential estates may provide an important informal recreation facility or be important for visual amenity. These areas may only be used for a kick-around area but they can provide an important facility and will be protected even though these areas are not shown on the Proposals Map.

The Urban Fringe

- 4.17 The urban fringe can provide an important buffer between agriculture and urban uses to protect crops from damage. This area can also satisfy informal recreation needs such as walking. In the case of Herne Bay and Whitstable, the urban fringe, and particularly the area at Swalecliffe known as the "Green Gap", is important to preserve the separate identities of the two towns as it provides a green corridor between the two urban areas. A recent appeal for industrial development north of Colewood Road/Whitstable Road at Swalecliffe (CA/92/0447/WHI), which is located in part of the Green Gap, was dismissed by the Inspector (June 1993). He stated that although it contains a static caravan and chalet park, these were thought not to be unduly intrusive and the area has an open, undeveloped nature and is important for the residents of the area. He also made the following comments:

"Although the landscape is not subject to any special protection policies, it is nevertheless an attractive visual feature and serves to separate the urban areas of Whitstable and Herne Bay. The Council's desire that this 'Green Gap' should remain as a fundamental element of the planning strategy for this part of the District, is strongly supported by the Whitstable Society and local residents".

The inspector concluded:

"...that the proposal would cause serious environmental harm to the locality and run counter to emerging policy for the protection of this important area of open land."

- 4.18 Another important area on the urban fringe is the land which lies between the existing A299 Thanet Way and the proposed off-line road improvement from Eddington Roundabout, Herne Bay to Church Lane, Seasalter. The City Council has stated that it does not wish to see development between these two roads and as a result these areas have been protected by the open space protection policy. This is discussed in detail in Chapter 5 Highway Schemes: Land Use Strategy with a detailed landscape assessment in Appendix 7.
- 4.19 The scheme for the Sturry Radial has been abandoned - the line of this route was adjacent to the River Stour. This line was protected for the implementation

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CHAPTER 5: HIGHWAY SCHEMES LAND USE STRATEGY

(THANET WAY REALIGNMENT AND STURRY BYPASS)

1. **Thanet Way (A299)**

Background

- 5.1 At a meeting of the Kent County Council's Planning Sub-Committee on 26 November 1991 an application was approved for the realignment of the Thanet Way between Church Lane, Seasalter and the roundabout at Eddington (see Plan 3). A public inquiry has also been held to consider Compulsory Purchase and Side Road Orders - the findings of this inquiry are still awaited.
- 5.2 As a result of the decision to realign the Thanet Way there is public concern about renewed development pressure within the area of land between the two roads and on sites immediately adjacent to the road corridors. The following paragraphs assess the main issues and outline the background to the underlying policy approach for the area. Plan 3 shows diagrammatically, the policy approach for this area, accurate boundaries should, however, be taken from the Proposals Map.

Study Area / Route Description

- 5.3 The study covers land between the existing Thanet Way and the realigned route of the road, the adjacent corridor of land on the north side of the existing Thanet Way, and land immediately to the south of the new road.
- 5.4 From Church Lane to Eddington the diverging route of the A299 runs through open countryside for approximately 9.4 kilometres (5.8 miles). These paragraphs give a brief description of the route; a detailed landscape assessment is contained in Appendix 7.
- 5.5 Eastwards from Church Lane, Seasalter, (the end of Stage I of the Thanet Way dualling scheme), the proposed road alignment diverges to the south of the existing Thanet Way and enters a cutting to pass under Clapham Hill. From Clapham Hill the road descends into the wide valley occupied by Bogshole Farm. The settlements of Chestfield and Greenhill occupy higher land to the north. This is a largely arable landscape with extensive views across the valley.
- 5.6 From Bogshole Farm the route follows this valley to Convicts Wood, skirting its southern edge and continuing through this arable landscape to Radfall Road, south of Radfall Corner. The road then passes north eastwards through areas of pasture and the Chestfield Golf Course. Recontouring is proposed at this point to allow the road to pass through a tunnel at Chestfield Golf Course.

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5.7 The landscape from this point eastwards is a relatively flat plain, bounded in the south by the Blean Woods Ridge, to the east by the higher land at Herne and with, higher land to the north, which then falls to the coast. Minor depressions are made in this plateau by the valleys of Westbrook and Plenty Brook but the overall character is one of a very open, arable landscape. The road then continues eastwards through this open landscape to pass under Thornden Wood Road to the west of the Share and Coulter Public House.

5.8 Continuing eastward the road follows the line of Owls Hatch Road to pass under Bullockstone Road between Greenhill and Bullockstone Farm. The proposed roadline then passes north eastwards skirting the southern boundary of Herne Bay Golf Course to rejoin the Thanet Way at Eddington Roundabout.

Amenity Importance of the Study Area and Policy Implications

5.9 The study area has a vital role in providing the landscape setting of the coastal towns and their associated settlements (see Appendix 7). It also acts as a recreational resource, being the closest open countryside to these towns.

5.10 Because of the amenity importance, both visual and recreational, it is vital to safeguard it from large scale expansion of development. The majority of the area is outside the urban boundary, there is therefore, a presumption against development of fresh land. Further detailed policy consequences are described below.

5.11 **Benacre Wood to Chestfield:** This is a predominantly open landscape, a wide valley from Benacre Wood to Chestfield. This extensive, open landscape is therefore very vulnerable to the impact of new development. Parts of this area also form the setting to the Blean Woods SLA complex. It is an attractive landscape and has a rural character worthy of conservation. It is vital to the setting of south Whitstable and Chestfield and is an area valued for the public access it provides for the adjacent urban population. **Canterbury District**

Local Plan Deposit Draft Proposals:-

- a) area identified as open space protection;
- b) extension is also proposed to the Blean Woods SLA to the west and south of Chestfield to include the setting to the main woodland and pieces of outlier woodland - Convicts and Longtye Woods.

5.12 **Chestfield to Greenhill:** A major aim of environmental policy at the coast is to retain the physical separation between Whitstable and Herne Bay. The landscape between Chestfield and Greenhill forms a strategic green wedge between these two settlements and provides their landscape setting, as well as giving public access. The green gap continues northwards to perform the same role between the settlements of Studd Hill and Swalecliffe. **Canterbury District**

Local Plan Deposit Draft Proposals:-

- a) area is identified as open space protection (see Chapter 4);
- b) character of the area to the south of Molehill Road forms an important

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part of the setting to the Blean Woods SLA - area identified as an extension to SLA (see Appendix 7).

- 5.13 **Greenhill:** The open landscape between the realigned Thanet Way and the southern margin of Greenhill forms an important part of the setting of that settlement in views from the south. The trees and vegetation associated with the "plot lands" help to soften the appearance of Greenhill's urban edge but the western margin of Greenhill and part of the southern margin, to the west of the School provide a very stark urban edge. This area could benefit from landscape improvements including tree planting. **Canterbury District Local Plan Deposit Draft Proposals-** because of the importance of this area for the setting of Greenhill and the public access it provides this area is identified as open space protection.
- 5.14 **Herne Bay Golf Course Triangle:** This is a valuable area of open space and the associated trees and hedgerows soften the impact of the eastern margin of Greenhill. This is a very open landscape and the area is particularly visible in the views from a wide number of points, especially from the east and south towards Herne Conservation Area and Hunters Forstal. **Canterbury District Local Plan Deposit Draft Proposals** - because of this prominent position and the areas important recreational role it is identified as open space protection.
- 5.15 **Thanet Way Corridor:** (running east - from Borstal Hill, through to Church Street, adjacent to the Chestfield and Swalecliffe Railway Station, through to the Westbrook Valley and then on to Greenhill Roundabout). As described above the open areas along this road perform an important role in softening the character of what is in many places a very urban area. The roadside verges adjacent to the Thanet Way are in places a valuable grassland habitat with many important plant species. The importance of such corridors and their open spaces is highlighted in the Kent Structure Plan (Third Review) Deposit Draft at Policy ENV11. This is an important strategic transport corridor for both rail and road users and has an important role in framing the opinion gained of this area by residents and visitors alike. **Canterbury District Local Plan Deposit Draft Proposals** - open spaces associated with this area are therefore identified as open space protection - see Chapter 4.
- 5.16 **Any additional development along this road would also lead to extra traffic and highway accesses. Indeed any such additional traffic on the existing Thanet Way would eventually lead to calls for an upgrading of the road. This would therefore be contrary to the approved approach of diverting traffic onto the modern realigned A299. Apart from Canterbury District Local Plan Deposit Draft allocations, new development will therefore not normally be permitted accessing onto the Thanet Way.**
- 5.17 The City Council has made clear its desire to see various highway improvements to the existing Thanet Way in conjunction with the construction of the new road. The road will, after the opening of the new Thanet Way, be redefined to perform a different role in the highway hierarchy (primary

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distributor in the urban area; secondary route in rural sections). Measures could be implemented to make positive use of this altered status. These include traffic safety measures and improvements to pedestrian and cycle movements. As well as development restraint this area should also be the subject of positive enhancement measures. This together with proposals for other parts of the study area are described below.

Enhancement Strategy and Environmental Improvement Zones

- 5.18 A general strategy is proposed to enhance, where appropriate, the appearance and use of the study area. These schemes would be formulated in cooperation with local landowners, residents and amenity groups. Any proposals would also need to be designed with regard for the area's landscape, recreational and ecological value. An outline of the types of schemes and areas to be investigated are given below. Such schemes would interpret Kent Structure Plan (Third Review) Deposit Draft Policies ENV11 (Transport Corridors) and ENV7 (Community Woodland). A strategy of schemes would be formulated for any available grant assistance.
- 5.19 **Thanet Way** - investigate the potential improvements associated with the road once its status is altered. This would be carried out in conjunction with the Highway Authority and British Rail.
- 5.20 **Western / southern edge of Greenhill** - investigate schemes to improve the area's general appearance. Schemes would seek to soften the hard urban edge and take account of the recreational use of the area.
- 5.21 **Realigned Thanet Way** - to investigate the potential for major landscaping/woodland planting projects to reduce the impact of the new road. These would include extensive woodland planting - most likely on remnant fields left over after roadline construction. This would complement proposed landscaping schemes directly associated the construction of this new road.

2. Sturry Bypass (A28)

Background

- 5.22 The scheme to construct a bypass, taking the A28 (Thanet to Canterbury) round the northern side of Sturry, is an approved one in the Kent Highways Programme. Alternative routes have been discussed but the line used for the purposes of this report is that approved by the County on 20th April 1993 (Plan 4). This route refined the western end of the bypass, which previously destroyed a larger area of ancient woodland at Den Grove Wood: detailed design is continuing.

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Appendix B South Whitstable Bus Timetable

Demonstrates how sparse a service this is.

Sunday 15 January 2023 ▼

Canterbury - Seasalter & Yorkletts

Show all stops

Canterbury Bus Station (Bay B3)	10:00	12:00	15:00	17:00
Northgate, o/s Sainsbury's	10:03	12:03	15:03	17:03
University of Kent Alcroft Grange (N-bound)	10:08	12:08	15:08	17:08
Chestfield, opp Maydowns Road	10:20	12:20	15:20	17:20
South Tankerton, opp Tesco	10:23	12:23	15:23	17:23
South Tankerton Grasmere Road (just after)	10:25	12:25	15:25	17:25
Tankerton Foxgrove Road (o/s 6)	10:27	12:27	15:27	17:27
Whitstable Harbour Street (S-bound)	10:33	12:33	15:33	17:33
Whitstable, adj Tollgate Close	10:42	12:42	15:42	17:42
Whitstable Sandpiper Road (SW-bound)	10:45	12:45	15:45	17:45
Seasalter Lucerne Drive East (NE-bound)	10:51	12:51	15:51	17:51

Seasalter & Yorkletts - Canterbury

Show all stops

Seasalter Lucerne Drive East (NE-bound)	09:00	11:00	13:00	16:00
Seasalter Cross (N-bound)	09:01	11:01	13:01	16:01
Whitstable Sandpiper Road (NE-bound)	09:05	11:05	13:05	16:05
Whitstable, opp Tollgate Close	09:08	11:08	13:08	16:08
Whitstable, adj Horsebridge	09:17	11:17	13:17	16:17
Tankerton Foxgrove Road (o/s 7)	09:23	11:23	13:23	16:23
South Tankerton, adj Lismore Road	09:24	11:24	13:24	16:24
South Tankerton, o/s Tesco	09:27	11:27	13:27	16:27
Chestfield, adj Maydowns Road	09:31	11:31	13:31	16:31
Tyler Hill, opp The Tyler's Kiln	09:39	11:39	13:39	16:39
Northgate, opp Sainsbury's	09:46	11:46	13:46	16:46
Canterbury Bus Station (arrivals)	09:51	11:51	13:51	16:51

Saturday 14 January 2023 ▼

Canterbury - Seasalter & Yorkletts

Show all stops

Canterbury Bus Station (Bay B3)	08:55	13:55	15:20	16:10	17:40	18:20	
Northgate, o/s Sainsbury's	09:01	14:01	15:26	16:16	17:46	18:25	
University of Kent Alcroft Grange (N-bound)	09:07	14:07	15:32	16:22	17:52	18:30	
Chestfield, opp Maydowns Road	09:19	14:19	15:44	16:34	18:04	18:42	
South Tankerton, opp Tesco	09:23	14:23	15:48	16:38	18:08	18:46	
South Tankerton Grasmere Road (just after)	09:26	then hourly until	14:26	15:50	16:40	18:10	18:48
Tankerton Foxgrove Road (o/s 6)	09:29	14:29	15:52	16:42	18:12	18:50	
Whitstable Harbour Street (S-bound)	09:37	14:37	16:00	16:50	18:20	18:58	
Whitstable, adj Tollgate Close	09:42	14:42	16:05	16:55	18:25	19:03	
Whitstable Sandpiper Road (SW-bound)	09:46	14:46	16:09	16:59	18:29	19:07	
Seasalter Lucerne Drive East (NE-bound)	09:51	14:51	16:14	17:04	18:34	19:12	

Seasalter & Yorkletts - Canterbury

Show all stops

Seasalter Lucerne Drive East (NE-bound)	07:01	08:53	14:53	16:16	17:06	18:36	19:14
Seasalter Cross (N-bound)	07:03	08:55	14:55	16:18	17:08	18:38	19:16
Whitstable Sandpiper Road (NE-bound)	07:08	09:00	15:00	16:23	17:12	18:42	19:20
Whitstable, opp Tollgate Close	07:11	09:04	15:04	16:27	17:15	18:45	19:23
Whitstable, adj Horsebridge	07:19	09:11	15:11	16:34	17:21	18:51	19:29
Tankerton Foxgrove Road (o/s 7)	07:27	09:19	15:19	16:42	17:28	18:58	19:36
South Tankerton, adj Lismore Road	07:30	09:22	15:22	16:45	17:31	19:01	19:39
South Tankerton, o/s Tesco	07:34	09:26	15:26	16:47	17:33	19:03	19:41
Chestfield, adj Maydowns Road	07:38	09:30	15:30	16:51			
Tyler Hill, opp The Tyler's Kiln	07:48	09:40	15:40	17:00			
Northgate, opp Sainsbury's	07:56	09:48	15:48	17:08			
Canterbury Bus Station (arrivals)	08:04	09:56	15:56	17:16			

And for Monday...

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Canterbury, adj Barton Court School			15:10						
Nackington, in Simon Langton Boys' School Grounds				15:55					
Canterbury Bus Station (Bay B3)	08:55		13:55	15:20	16:10	17:40	18:20	19:15	
Northgate, o/s Sainsbury's	09:01		14:01	15:26	16:16	17:46	18:25	19:20	
University of Kent Alcroft Grange (N-bound)	09:07		14:07	15:32	16:22	17:52	18:30	19:25	
Chestfield, opp Maydowns Road	09:19		14:19	15:44	16:34	18:04	18:42	19:37	
South Tankerton, opp Tesco	09:23	then hourly until	14:23	15:48	16:38	18:08	18:46	19:41	
South Tankerton Grasmere Road (just after)	09:26		14:26	15:50	16:40	18:10	18:48	19:43	
Tankerton Foxgrove Road (o/s 6)	09:29		14:29	15:52	16:42	18:12	18:50	19:45	
Whitstable Harbour Street (S-bound)	09:37		14:37	16:00	16:50	18:20	18:58	19:53	
Whitstable, adj Tollgate Close	09:42		14:42	16:05	16:55	18:25	19:03	19:58	
Whitstable Sandpiper Road (SW-bound)	09:46		14:46	16:09	16:59	18:29	19:07	20:02	
Seasalter Lucerne Drive East (NE-bound)	09:51		14:51	16:14	17:04	18:34	19:12	20:07	

Seasalter & Yorkletts - Canterbury

Show all stops

Seasalter Lucerne Drive East (NE-bound)	06:33	07:01	08:53			13:53	16:16	17:06	18:36	19:14	20:09
Seasalter Cross (N-bound)	06:35	07:03	08:55			13:55	16:18	17:08	18:38	19:16	20:11
Whitstable Sandpiper Road (NE-bound)	06:38	07:08	09:00			14:00	16:23	17:12	18:42	19:20	20:15
Whitstable, opp Tollgate Close	06:41	07:12	09:04			14:04	16:27	17:15	18:45	19:23	20:18
Whitstable, adj Horsebridge	06:48	07:19	09:11			14:11	16:34	17:21	18:51	19:29	20:24
Tankerton Foxgrove Road (o/s 7)	06:55	07:27	09:19			14:19	16:42	17:28	18:58	19:36	20:31
South Tankerton, adj Lismore Road	06:58	07:30	09:22	then hourly until		14:22	16:45	17:31	19:01	19:39	20:34
South Tankerton, o/s Tesco	07:00	07:34	09:26			14:26	16:47	17:33	19:03	19:41	20:36
Chestfield, adj Maydowns Road	07:04	07:38	09:30			14:30	16:51				
Tyler Hill, opp The Tyler's Kiln	07:13	07:48	09:40			14:40	17:00				