

## Consultation Response - CCC Canterbury District Local Plan to 2045

### **Section 1: Spatial Strategy**

#### **Policy SS3 – Development strategy for the district.**

Insufficient information has been provided by CCC to enable residents to understand the significance of many of the draft Local Plan's proposals, such as the number of homes proposed to be built. Press reports however state that CCC is proposing to build considerably more housing than required by central government in order to maximise community infrastructure levies. This would not be sustainable development and therefore contrary to the NPPF.

(The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development, i.e. meeting the needs of the present without compromising the ability of future generations to meet their own needs. The 2045 Local Plan will without doubt be followed by many more Local Plans, each demanding increasingly scarce farmland for housing development. If we squander scarce farmland now, it will compromise the ability of future generations to find land to meet their own needs.)

Instead of building the proposed number of homes, the development plan should be based on local housing requirement.

#### **Policy SS4: – Movement and transportation strategy for the district**

The construction of a new eastbound off-slip between A299 Thanet Way and Chestfield Road will lead to a considerable increase in traffic on Chestfield Road and South Street, including heavy vehicles. I have friends on Chestfield Road who say that CCC and local councillors have told them nothing about this. This contravenes NPPF section 16 which states that "Plans should ... be shaped by early, proportionate and effective engagement between plan-makers and communities."

The partitioning of Canterbury by the Canterbury Circulation Plan is based on the principle of diverting traffic onto a ring road, as used in Ghent. However, even after the proposed road improvements are fully built, there will not be any northern ring road, so considerable flows of traffic will divert onto existing roads such as Tyler Hill Road. Have local residents been consulted about the amount of extra traffic using this bendy, rural route?

### **Section 2: Canterbury**

The real test of how much CCC want to increase cycling is whether cyclists will be permitted to cycle at all times of the day through the main north-south thoroughfare of Canterbury, viz the High Street and St Georges St. It appears that CCC is not proposing this. CCC will be unlikely to achieve full potential of modal shift unless they allow cyclists to travel the routes that they require.

It should be noted that the proposals to banish cars from within the city walls will deter shoppers from visiting Canterbury stores. Many will transfer their custom to out-of-town stores and e-shopping. Is this a good idea at a time when many high-street stores are already struggling? The proposals would appear to contravene NPPF clause 81, which states that “Planning policies ... should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account ... local business needs...”.

### **Section 3: Whitstable**

In common with other coastal settlements, Whitstable faces particular challenges when trying to find land for new housing. It cannot expand northwards (into the sea), westwards (floodplain and marshes), or eastwards (into Hampton and Herne Bay Herne Bay). Land to the south of Whitstable is of high landscape value and forms the natural setting for this town – a point not to be underestimated noting the value of tourism to the local economy.

Whitstable needs a green belt to preserve its setting. At the very least, CCC’s proposed Green Gap between Whitstable and Radfall (merely about 150m along the road!) should be expanded to include the whole of Brooklands Farm, thereby preserving the full width of the valley of the Swalecliffe Brook.

Another serious problem faced by Whitstable is that the local sewage works at Swalecliffe cannot cope with the sewage from existing housing at times of heavy rainfall. At such times sewage effluent is discharged from a Short Sea Outfall that is broken and believed to be more than 100 years old. This pipe does not extend as far into the sea as some parts of the foreshore at low tides, consequently if the wind is from the west or north then effluent is very likely to be blown back onto the beach creating a serious public health hazard.

During such effluent releases there are no visible warnings to beach users. There is no reporting system for people who become ill with infections, so the full impact of the problem is unknown. It should be noted that the Swalecliffe foreshore is popular with local residents and visitors for dog-walking, fishing, fossil-hunting and other beach combing activities. Visitors at the caravan park also go swimming here in the summer.

Southern Water do not appear to have any plans for eliminating this health hazard. Their publicity describes only proposals for a replacement outfall of higher capacity, and apparently this would be another “short” outfall. There is now growing public opinion (including a petition with over 900 signatures at 15-1-23) for CCC to halt all new housing development until sewage pollution stops or significant improvements are put in place by Southern Water.

I would like to request that all future planning permissions for houses in the Swalecliffe catchment area should be subject to a Grampian condition that the houses cannot be occupied until Southern Water install a public warning mechanism (e.g. a red flashing light) clearly visible from the Swalecliffe foreshore to warn beach users whenever the Short Sea Outfall is in use for discharges, and continuing the warning for another 24 hours after the end of the release.

Finally, a few words about sustainable transport. How can it be, that even after construction of the new developments at Whitstable Heights and Mariners View, the A2990 Thanet Way shared-use footway/

cyclepath is still of very substandard width, totally inadequate for the current number of school users. Moreover, there is still no Toucan crossing over Borstal Hill, even though children have to cross multiple lanes of rush-hour traffic on journeys to / from school. Provision of this Toucan and widening the cycle path must be considered as highway safety issues and be given priority access to funding. Improvements are also required in vegetation maintenance to remove encroaching bushes on cycle routes.

#### **Site W5: Brooklands Farm**



*Above: View from Rayham Road across the valley of the Swalecliffe Brook towards The Blean. This would be obscured by houses if Brooklands Farm is approved for development*

Brooklands Farm is totally unsuitable for the proposed development because it is in an area of High Landscape Value. This is shown clearly on page 10 of the 2017 Canterbury District Local Plan. The landscape has not changed since then, and it continues to have same intrinsic value.

The *Canterbury Landscape Character Assessment and Biodiversity Appraisal* (October 2020) notes that this area (Chestfield Farmland) retains relatively strong rural character, and also that it provides an important recreational link between Whitstable and the Blean. It advises CCC to “continue to conserve the open rural setting of the A299 resisting pressures for unsympathetic linear development along the corridor to help reinforce the open rural setting south of Chestfield and Whitstable.”



*Photo above: Cattle pasture at Brooklands Farm.*

The proposals to build on Brooklands Farm also appears to be contrary to NPPF clause 174 which states “Planning policies and decisions should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes....and....recognising the intrinsic character and beauty of the countryside”.



*Photo: The east side of the Brooklands Farm site*



The proposals to “provide 20% biodiversity net gain” appear extremely questionable. How could the developers increase biodiversity when they will be destroying farmland with its native fauna and flora characteristic of open countryside? Especially the pastureland where the presence of grazing animals creates its own micro-ecosystems.

### **W6 Land South of Thanet Way**



*Photo above: Site W6 from adjacent A2990 Old Thanet Way, showing the skyline and Benacre Wood.*

Site W6 lies on top of a ridge of rural high ground. Any new buildings here would be an “eyesore”, widely visible from north (A2990 Old Thanet Way) and the south (A299 New Thanet Way and from surrounding countryside). It would not be possible to screen any development using native trees, especially in winter.

The site is a unique location, being the only place in Whitstable where we have an inspiring view to both north (the sea) and inland to the south (over a rural valley towards the forested Blean hills).

The *Canterbury Landscape Character Assessment and Biodiversity Appraisal* (October 2020) notes that this area “retains relatively strong rural character” and advises CCC to “improve the appearance of the transport corridors of the Old Thanet Way and A299 New Thanet Way. Conserve the open rural setting along corridors, resisting any unsympathetic linear development along corridors to help reinforce the open rural setting.”

This site is therefore not suitable for development. Building on this site would contravene NPPF policy 174 which states that “Planning policies and decisions should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes ... and ... recognising the intrinsic character and beauty of the countryside).”

It is doubtful that any park-and-bus facility here would be popular, because (1) most drivers would arrive here via the often-congested roads around the Long Reach roundabout, (2) proposals for a new road in planning application 22/01527 will encourage drivers to route away from this area, and (3) the proposed A299 off-slip at Chestfield will also encourage drivers to route away from this area. It seems likely therefore that the proposed 300-space car park will later be used for more housing.

The claim that 20% biodiversity net gain can be achieved appears highly unlikely. This development would obliterate the habitat required by wildlife native to open landscapes, such as the hare that I have seen here.

**W7 Golden Hill**

This site lies on the skyline adjacent site W6 and would be an unsuitable location for development for the same reasons as cited for W6.

**Policy R26 – Broad Oak Reservoir and Country Park**

The Country Park concept is vague, so it is not clear what we are being consulted about. We need to bear in mind that agricultural land is a strategic asset that will be becoming increasingly scarce and increasing in demand in future years (i.e. the “sustainability” issue). CCC therefore needs to ensure that only the minimum amount of agricultural land is taken, sufficient only to enable water companies to provide water for essential purposes.

Peter Slaughter

[REDACTED]

[REDACTED]

[REDACTED]