



Response to the Draft Canterbury District Local Plan to 2045 from the Friends of Nethergong Valley

2 messages

Nethergong Friends [REDACTED]
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Draft Canterbury District Local Plan to 2045 (Regulation 18) (Regulation 18) Consultation 2023

Response from the Friends of Nethergong Valley

We are the Friends of Nethergong Valley, a constituted community group which aims to:

- Raise the profile of, and knowledge about, the Nethergong Valley and Nethergong-Sarre Penn wetlands and the surrounding landscape
- Conserve and preserve the Nethergong Valley as a Green Space
- Undertake actions to conserve, preserve, improve and restore the Nethergong Valley, the Nethergong-Sarre Penn wetlands (part of the Lower Stour Wetlands) and the historic Wantsum Channel for the benefit of everyone

The Nethergong Valley is a beautiful area of sloping farmland between the villages of Chislet and Hoath. It leads down to an area of grazing marsh and the Nethergong Penn, a rare chalk stream, which feeds into the River Stour. It is bordered by Marley Lane to the north and Island Road (A28) to the south.

It is located in H2 Hoath Farmlands and B2 Nethergong Sarre Penn Inlet areas as defined by the Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020.

It also lies in the Wantsum Channel Area of High Landscape Value, one of only five in Canterbury District. It is home to species including water voles, otters, turtle doves, bats, owls, mallards, cetti's warbler, skylarks, reed buntings, lapwings, kestrels, buzzards, moorhens, herons, little egrets, dragon flies, Adonis blue butterflies and badgers.

Our response to the Draft Canterbury District Local Plan to 2045

Policy SS1

We welcome points 2 of SS1 which states it will ensure that rivers and streams – such as the Nethergong Penn – which provide “important habitat, valued landscapes and spaces for creation” will be “protected, maintained and be enhanced in line with Policy DS19”

We also welcome point 3 which says the Council will work with its partners to “support and sustain the full recovery of the Stodmarsh Nature Reserve”.

However, we object to point 7 which says that “large scale renewable power generation will be encourage in suitable locations across the district”. We believe that this poses an unacceptable risk to the countryside and the “valued landscapes” referred to in point 2. We demand that point 7 be redrafted to state that the Council will not support large scale energy parks on agricultural land, especially not the best and most versatile land (BMV) and will not allow large scale energy plants to damage “valued landscapes”.

The Draft Nutrient Mitigation Strategy (21160-NUT-RP-02/C01)

We welcome the draft nutrient mitigation strategy for encouraging the conservation and restoration of wetlands.

We welcome the document's consideration of the Stour Valley River Catchment as a whole when considering potential adverse impacts on the Stodmarsh Complex.

However, it is unfortunate that the Nethergong Penn inlet is not specifically named in the document. Instead, it is included in the Sarre Penn & Wantsum. We believe that this is an unfortunate oversight and the Nethergong Penn should be identified in this document. It is important that the Nethergong Penn is explicitly named as too few people appreciate that the Nethergong Valley (the area between Marley Lane/Hollow Street in the north and the A28 in the south) is part of the Stour Valley River Catchment. Unless the

Nethergong Penn/Nethergong Valley is explicitly named in the local plan decision makers may fail to notice that new development will drain into the Nethergong Valley wetland, out through the Chislet Marshes into the Wantsum Channel with potential for creating new environment problems.

We welcome Chapter 6, Next Steps in the document with its focus on "Ongoing identification of land use change projects within the District/Stour catchment."

Appendix A of The Draft Nutrient mitigation strategy lists development sites SLAA146, SLAA202 and SLAA240 as draining into the Sarre Penn & Wantsum. In fact, they would drain into the Nethergong. We ask that the Nethergong Valley be considered for wetland restoration.

Policy DS25 – Renewable energy and carbon sequestration

We oppose this policy which contains a threat to the countryside and rural communities. DS25 needs to be rewritten to state explicitly what is and what is not an "appropriate" location for large scale energy parks. This policy needs to include explicit protection for BMV land, farmland, heritage, and landscape.

We object to the dropping of The 2017 Local Plan Policy DBE2 Renewable Energy which listed criteria to be used to assess the impact of a renewable energy project and to mitigate any unintended consequences. We call for the reinstatement of policy DBE2 in the new local plan.

Policy DS22 – Landscape Character.

We welcome this policy. We believe that the important and rigorous conditions listed in DS22 MUST be met before planning permission is granted for any proposed development. In particular, Clause 3, which states that "Proposals for development which would cause significant harm to the landscape character of an area will be refused." This policy must be rigorously enforced in close consultation with local communities and parish councils. The council itself must not include developments in this Draft Canterbury District Local Plan to 2045. The council must check its own Draft Local Plan for proposals which breach its own Policy DS22 and remove them from this draft.

Topic Paper on Climate Change

This is a very disappointing document that gives no priority to rooftop installation or brownfield sites and talks instead about a "rapid increase" in installations "of all types". It should not be allowed to sit alongside the other topic papers as part of the evidence base for the local plan.

The same standards are not being applied across different topics. All the sites discussed/listed in tables in the topic papers were submitted as part of the call for sites process. But very different standards are being applied depending on whether the site was submitted for housing, open space or energy plants.

The Strategic Land Availability Assessment (SLAA) document P14 shows that most sites (148 out of 221 or 67 per cent) were found to be unsuitable for the development proposed. A reason is given for this conclusion in Column BC of appendix C. A further 22 were found to be technically suitable but the development proposed conflicts with existing policy and this policy clash was explained in the document

The Open Spaces topic paper rejects sites proposed if they are currently Grade 1, 2 or 3 agricultural land, noting that it is against Government policy to use BMV land for Open Spaces.

However, the Climate Change Topic Paper does not scrutinise the sites submitted in this way. The NPPF says that BMV land should not be used for large renewable energy generation but CCC's Climate Change Topic Paper does not take that into account. Very few sites submitted for renewable energy generation are rejected and then it is for being too small to generate significant energy or being a nature reserve. No consideration is given to BMV land. In section 6.3 of the Climate Change Topic Paper the renewable energy SLAA sites are all listed. But all it says for them is "currently agricultural land". There are policy constraints around the use of agricultural land for energy parks but this is never mentioned in this highly ideological paper.

SLAA280 Marley Solar Farm

This is a proposal to build a 250-acre solar farm on grade 1, 2 and 3 agricultural land. This vast industrial energy generation site would take up the entire northern slope of the Nethergong Valley. It would stretch from Hoath in the east, entirely encircle the hamlet of Chislet Forstal and run all the way to Hollow Street, Chislet in the west.

This is a completely inappropriate proposal and MUST be removed from the Climate Change Topic Paper.

- It is BMV agricultural land and it is against the NPPF to build energy parks on BMV land
- It would be highly damaging to the landscape in an area of high landscape value (one of only five in Canterbury district)

Proposal SLAA280 would be completely contrary to the Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020, which forms part of the evidence for the draft local plan and which the new local plan policy DS22 says must be strictly followed.

The Development Management section of the B2 Nethergong chapter of the Landscape Character Assessment 2020 says that any development must:

- Conserve the historic field pattern of the landscape by avoiding unsympathetic culverting of water courses.
- Conserve the open and undeveloped 'remote' undeveloped character of the landscape, avoiding the further introduction of large scale or incongruous elements.

The Development Management section of the H3 Hoath Farmland chapter of the Landscape Character Assessment 2020 says that any development must:

- Conserve the open and rural landscape and avoid the introduction of large scale or incongruous elements in order to retain long distance views.

It is clear that this giant industrial solar facility, which would completely fill the green space between the villages of Hoath and Chislet, does not fit with the NPPF, the Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020 or policy DS22 in the draft Local Plan and should be either removed from the Climate Change Topic Paper or marked as unsuitable within it.

Development site SLAA280 contains several natural springs (clearly marked on Ordnance Survey maps). Part of the site has been identified as a potential area for wetland renewal according to Kent County Council's mapping tool KLIS. Wetland renewal is a far better climate change measure than building a solar farm on a wetland site. This is a clear policy clash with the laudable aims of policy SS1 and the Draft Nutrient Mitigation Strategy.

The SLAA280 has previously been used to grow winter wheat, oil seed rape, spring wheat, spring beans and barley among other groups (see Bletsoes sales brochure from 2016 submitted as evidence). This is clearly BMV land and should not be included as a potential site for an industrial solar park.

The current adopted 2017 Local Plan includes Policy T16 Rural Lanes. This says "Rural lanes which are of landscape amenity, nature conservation, historic or archaeological importance will be protected from changes and management practices which would damage their character, and where possible be enhanced." Unfortunately, this protection of rural lanes (such as those which border the Nethergong Valley) has been removed from the current draft Local Plan. We ask that this policy be reinstated.

Policy DM17 – Noise Pollution and Tranquility we welcome this policy

Policy DM18 – Light Pollution and Dark Skies. We welcome this policy

The Canterbury District Tree & Woodland Strategy 2022 – 2045, we welcome this policy

Good morning,

Thank you very much for your email. I will ensure your comments are reported and considered as part of the consultation process.

Please may your provide a contact name?

All the feedback we receive will be carefully analysed and reported to councillors who will decide what changes should be made to the draft Local Plan.

Later in 2023, we will publish the final draft Local Plan and you will be able to make further comments before the plan is submitted to be examined by the planning inspector.

Warm wishes,

Victoria Asimaki

Principal Policy Officer (Engagement)

Canterbury City Council

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