

# CHISLET PARISH COUNCIL



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## Re: Comments on Draft Canterbury District Local Plan

Dear Colleague

Chislet Parish Council (CPC) welcomes the opportunity to comment on the Draft Canterbury District Local Plan. We thank our colleagues at Canterbury City Council (CCC) for their hard work that sits behind the documentation and proposals. Below we summarise our feedback.

### Draft Local Plan

These comments relate specifically to the contents of the published Draft Local Plan document, referring to numbered paragraphs where relevant.

**Overview.** Whilst CCC has emphasised its need to adhere to government targets, it should be recognised that central government policy is in constant flux. Any plan that runs for a generation must balance short term execution rules. For example, permission for houses must be linked with legally binding delivery of amenities and services.

**Policy SS1 – Environment & Biodiversity.** Biodiversity requirements cannot be allowed to reward prior irresponsible land management. There must be more clarity about the baseline for a 20% improvement needed, including the prior management of the land up to that point in time. Green requirements (such as for housing developments) should be expanded and legally enforced.

**Policy C4 – Canterbury Circulation Plan.** Proposals must be compatible with access needs of rural residents, including public transport and ongoing provision for private transport. The evidence seems that the plans are Canterbury-centric with no consideration of the wider district or rural settlements.

**Service centre expansion plans.** Upstreet and the villages of Chislet are already suffering from traffic levels as we have notified separately. Developments in neighbouring areas, not least Hersden, Sturry and the A2 extension, expose these communities to even greater levels of disruption, pollution and safety risk. Our communities will suffer from all of the strain on resources with no drafted benefits of amenities of services

**Settlement hierarchy.** The table on page 13 carries Boyden Gate as a hamlet and a village. We believe it should be classified as a hamlet.

**Policy R28.1.** We broadly agree with the statement but refer to our exchanges with CCC with regards to Puddledock, Hollow Street, Highstead as evidence of the opposite. CCC is turning a blind eye to new unauthorised development that is a danger to the character and appearance of the countryside.

**Policy R28.2.** We broadly agree with the statement and seek reassurances about how this is consistent with actions taken (or not taken) with regards to the digestate pit and solar energy plant about which we have communicated separately.

**Policy R28.4.** We broadly agree with the statement but believe the lack of action and support for traffic disruption and public transport services across our parish is evidence for the opposite.

**Policy R28.5.** We broadly agree with the statement but our experience with regards to Park Farm Road and Nethergong contradicts this. There are important local hubs in our community that are being neglected, including but not limited to: St Mary's Church, The Royal Oak, Upstreet Post Office, Chislet Primary School, the two Elizabeth Nursing homes, Clark's Car Garage, Port Farm Industrial Units, Wall End industrial units, Nethergong Nurseries, and Nethergong Camping.

**Policy DS7.** Part of this funding should be made available to mitigate the impact of increased traffic flow from new housing in Hersden on neighbouring settlements. Consideration should be given to improvements in the road system, including a reduction of the 60mph speed limit out of Hersden towards Upstreet

**Policy DS14.** There seems insufficient consideration of including physically segregated cycle lanes out of Hersden on A28 to Upstreet and beyond to connect to the Thanet coastal cycle paths. There is nothing relating to improving Upstreet village / Chislet access to countryside via enhanced signage & rigorous maintenance / enforcement of footpath network. This seems further evidence that rural communities are being left as an afterthought in this plan.

**As we emphasise below, CPC is greatly concerned that the formal Draft Canterbury District Local Plan makes only casual and generic passing comments about rural communities. These comments are hard to disagree with but largely contradicted by our experience on the ground.**

### **Local Plan Map and Supporting Evidence**

As a general comment, whilst CCC has offered substantial public engagement on the Draft Local Plan document itself, outreach on the local plan map and supporting evidence documents has been negligible. There is considerable detail in these documents that affect the villages of Canterbury District (those areas that sit outside the designated boundaries of the plan itself) in a way that is likely poorly understood across the community. Lack of comment, therefore, should not be taken as a sign of consent by rural communities. It is more likely lack of awareness.

Taking this important caveat into consideration, we observe the following key points from our first review of these multiple documents:

- The local plan map shows no Green Gap between Upstreet and Hersden. This should be included as CCC has committed to CPC in the past.
- The local plan map's gap in Local Landscape Designation (LLD) between Hoath in the west to Chislet in the east is an anomaly that should be corrected by extending the Wantsum Channel LLD westwards. The area is highly visible to the north of the A28 and Upstreet and part of the Nethergong Valley rural system.
- The Climate Change Topic Paper should be removed from the supporting material of the Local Plan. Its contents have not been subject to the same rigour as the Plan and the inclusion of suggestions for sites seems arbitrary and creates the wrong impression of consent.
- Climate Change Topic Paper Table 6.3.1 / SLAA280 refers to the solar infrastructure project that the councils of Chislet and Hoath have strongly objected to on the grounds of damage to the rural economy and environment by the redesignation of best and most versatile agricultural land. It should be removed.

### **Conclusion**

CPC agrees with the variety of feedback comments we have heard from our peer rural communities that CCC's Draft Local Plan requires closer consultation and community agreement for relevant proposals that go beyond the highly publicised issues of location of houses and Canterbury traffic.

CCC must provide published evidence that the cost / benefit of major proposals that is balanced between rural areas (who take cost) and district urban areas (who take benefit); and rural residents (who bear the risk) and private developers (who take the gain)

We hope our comments will be given fair consideration. We would be delighted to engage further if you require more information.

Yours sincerely



**Geoff Eaton**  
**Clerk to Chislet Parish Council**

cc Rachel Carnac, Canterbury City Council &  
Alan Marsh, Kent County Council