



Consultations Team,
Canterbury City Council,
14 Rose Lane, Canterbury,
CT1 2UR

20.10.25

Re: Comments on Draft Canterbury District Local Plan

Dear Colleague

Chislet Parish Council (CPC) welcomes the opportunity to comment on the Focussed consultation on 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.

Overview

We are concerned that our comments on the last draft Local Plan have not been taken on board and that many of the important issues from the 2024 local plan are not being reconsidered in 2025.

The partial nature of this latest consultation means that a complete view of housing allocations across the district is not being considered. In particular the cumulative effect of the new housing allocations around Herne Bay have not been considered, in particular in increased traffic on the A291 between Herne Bay and Canterbury and the A28 through Upstreet.

New sites

Policy N28: Land to the east of Bullockstone Road; Policy N29: Land at Home Farm, Strode Park;

Policy N30: Land to the west of Bullockstone Road

We are concerned about the cumulative effect of an extra 285 houses in this area on top of the nearby strategic sites at Strode Farm and the former Golf Course. This part of Herne Bay has already seen a huge amount of development following the 2017 Adopted Local Plan, and the additional pressure from N28, N29 and N30 would further erode local character, green infrastructure and amenity. It could also mean an extra 600 cars on the A291 Canterbury Road between Herne Bay and Sturry. This road has already seen a sharp rise in traffic volume due to the existing developments. Adding three new development sites in this concentrated area will make the situation much worse.

We also note that Site N28 is currently allocated as part of a wider area of Existing Open Space (Policy OS9 of the Adopted Local Plan 2017), which was specifically protected as to provide a green buffer between Herne Bay and the Thanet Way. The 2024 Natural Environment and Open Space Topic Paper confirmed that this area should continue to be protected as an open space.

We therefore strongly disagree that the site can be removed from this protection and built on. The removal of this parcel of land from the protected corridor undermines the coherence of the EOS.

Policy N33: Land at the former Spires Academy

We are concerned at the cumulative effect of an extra 37 houses in Hersden on top of the enormous amount of development that has already taken place or that has yet to be built in the area. The extra traffic generated by this development will have to pass along Bredlands Lane, a narrow rural lane, and then onto either the A28 Staines Hill/Island Road or Hoath Road.

The A28 Island Road through Upstreet has already seen a large increase in traffic due to the scale of development in Hersden and Thanet. If this development goes ahead we would like to see money spent on traffic calming measures through Upstreet.

Comments on previously consulted on policies

Renewable Energy

Although Policy SS1 (Environmental Strategy) and Policy DS25 (Renewable Energy) are not being consulted upon as part of this focused Regulation 18 stage, Chislet Parish Council would like to update our previous comments in light of continuing public concern and recent experience both within the parish of Chislet, the district of Canterbury and the wider area across the county of Kent.

Policy SS1 – Environmental Strategy for the district. Point 9 states that “Large scale renewable power generation applications will be encouraged, in line with Policy DS25”.

Policy DS25 Renewable energy and carbon sequestration Point 1 states that “**significant** weight” will be given to “the carbon emissions reduction and energy resilience that the projects can deliver”.

We believe that this wording in the current draft is weak and will be used by unscrupulous developers to build overly large industrial energy facilities in the countryside.

We believe this wording gives disproportionate weight to the scale of energy generation without sufficient regard for the protection of landscapes, agricultural land, biodiversity or the amenity of rural residents.

There is a growing recognition across the UK that the benefits of renewable energy must be balanced against the irreversible harm caused by large-scale schemes on productive farmland, in sensitive landscapes and near to people’s homes.

National policy seeks to increase renewable energy generation but it also expects local plans to direct such developments to appropriate locations and to protect valued landscapes, heritage buildings and the best and most versatile farmland.

It is therefore essential that Policies SS1 and DS25 are reworded at the next stage, to ensure that the volume of energy generated is not treated as a factor which can override all other priorities.

Local decision-makers must be explicitly given the tools to give them the confidence to refuse proposals which would cause significant environmental or landscape harm, or loss of the best and most versatile agricultural land, consistent with the intention behind Policy DS12 (Rural economy) and the principles of sustainable development.

We strongly object to the current wording of these two policies (SS1 and DS25) which we believe will make it very difficult to resist the large-scale industrialisation of the countryside.

We note that policy DS25 says proposals for renewable energy projects “will be supported where this aligns with other policies in the plan”. We recognise that this is where damage to landscape, amenity,

heritage, wildlife and loss of best and most versatile agricultural land will be considered. However, we believe that giving “significant weight” to the amount of energy produced will swing the balance too far in favour of developers proposing extremely large-scale facilities.

The current adopted Local Plan (2017) handles this issue with Policy DBE2 Renewable Energy which lists the ways in which energy developers must avoid damaging their environment or residents’ amenity.

We propose that the word “significant” be removed from DS25 and the list of protections currently given by policy DBE2 be reinstated and strengthened.

Green Gap

We are disappointed that CCC has dismissed our request for a Green Gap between Upstreet and Hersden. This should be included as CCC has committed to CPC in the past. Successive developments have narrowed the gap between the two settlements. Green Gap protection should not just be for when settlements are in imminent danger of coalescing.

Local landscape designations

Point 3 Policy DS19 Habitats, landscapes and sites of local importance should be amended to give greater protection to landscapes of local importance. The current wording of point 3 only refers to developments *within* the LLD. This should be extended to include proposals for development likely to have an adverse effect on the LLD. The current wording leaves LLDs vulnerable to having their special character eroded by inappropriate development immediately adjacent and overlooking them.

The Canterbury District Local Landscape Designations Review (2021) conducted by LUC evaluated the Wantsum Channel LLD and concluded that the Nethergong Penn was a “distinctive valley” with a “strong and unique sense of place”. Ideally the Local Landscape Designation (LLD) would be extended to include the valley slopes as well as the base of the valley as development of the slopes will damage the LLD. Alternatively point 3 of Policy DS19 could be reworded to echo the wording of Point 1 of DS19 ie to include any “development likely to have an adverse effect, either directly or indirectly” on a LLD.

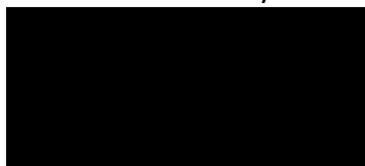
Policies for Rural areas

The current adopted Local Plan (2017) contained several good policies that related specifically to protecting the character of rural areas. It is regrettable that these have either disappeared completely (Policy T16 Rural Lanes) or been amalgamated into more general policies (Policy EMP12 Agricultural Land in the current adopted local plan has become part of the more general Policy DS12 - Rural economy in the new draft plan and Policy TV7 Rural Tourism in the current adopted local plan has become part of the more general Policy DS11 - Tourism development in the new draft Local Plan.

Conclusion

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