

## **REGULATION 19 REPRESENTATION – OBJECTION TO THE PROPOSED ALLOCATION / DEVELOPMENT OF SLAA062 (BARHAM)**

Jon Dyer

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Objection Local Plan Section: Site Assessment / Proposed Allocations – Barham (SLAA062) Site  
Reference: SLAA062 – Land at Barham (2.78 ha, 24 dwellings)

### **1. Introduction**

I submit this representation in response to the Canterbury District Local Plan Regulation 19 consultation. I strongly object to the potential allocation or future development of SLAA062, a 2.78-hectare greenfield site in Barham, assessed in the 2022 SLAA as “suitable” for approximately 24 dwellings at 20 dph.

This representation demonstrates that the site is not sound, not justified, not effective, and not consistent with national policy, as required by NPPF paragraph 35.

### **2. Conflict with Adopted Canterbury District Local Plan (2017) Policies**

#### **2.1 Outside the Settlement Boundary – Policy SP1 & Policy HD4**

Barham is not allocated for growth in the adopted Local Plan. SLAA062 lies outside the defined settlement boundary, where Policy SP1 and HD4 strictly limit development to:

- Rural exception housing
- Agriculture / forestry
- Essential rural uses

A speculative greenfield estate of 24 dwellings directly conflicts with these policies.

#### **2.2 Harm to the Kent Downs AONB – Policy LB2**

Policy LB2 (Landscape Character and AONB Protection) requires that development:

- Conserves and enhances the natural beauty of the AONB
- Protects key views and landscape character
- Avoids suburbanising rural areas

SLAA062 sits within the setting of the Kent Downs AONB, and this development would detrimentally:

- Extend built form into open countryside
- Introduce lighting, traffic, and noise
- Erode the rural landscape character

This is contrary to LB2 and NPPF paragraphs 176–177, which require great weight to be given to conserving AONB landscapes.

#### **2.3 Loss of Greenfield Land – Policy OS6**

- Policy OS6 protects open countryside from unnecessary development. SLAA062 is a greenfield site, and its development would result in:
- Permanent loss of potential agricultural land
- Urbanisation of rural landscape
- Avoidable environmental harm with hard landscaping, roads, housing, lighting, loss of habitat, spaces for nature etc.
- This is inconsistent with the Local Plan's spatial strategy.

#### 2.4 Unsustainable Transport and Highways Impact – Policies T1, T3, T9

- Barham's road network is already constrained:
- Valley Road is narrowed by constant parking
- Church Lane is extremely narrow with blind bends
- No pavements on key pedestrian routes
- No safe walking route to the school or village green
- Policies T1 (Transport Strategy), T3 (Pedestrian Safety), and T9 (Parking Standards) require development to be safe, accessible, and sustainable.
- SLAA062 cannot meet these requirements.
- This Increased housing equates to increase in vehicular traffic, increase in frequency of delivery vehicles, the area is already a rat run and small road network unable to manage traffic.

#### 2.5 Pressure on Utilities – Policy CC4 (Sustainable Drainage) & Policy EMP12

Barham suffers from:

- Limited sewer capacity
- Vulnerable water supply in the Nailbourne valley
- Surface water flooding
- Chalk geology with poor winter infiltration
- Increased demand on the sewer network for foul and grey water.
- Increase demand for potable water.

Policy CC4 requires developments to demonstrate sustainable drainage and no increase in flood risk. SLAA062 fails this test.

#### 2.6 Impact on Community Facilities – Policy QL3

Policy QL3 requires that development does not overload local services.

Barham Primary School is at or near capacity. The village has limited services and no capacity to absorb additional population growth.

### 3 Conflict with Emerging Local Plan (Regulation 19 Draft)

Even under the emerging plan, SLAA062 fails the tests of soundness.

#### 3.1 Spatial Strategy – Policy SP2 (Emerging)

The emerging plan focuses growth on:

- Canterbury
- Strategic sites

- Sustainable settlements with infrastructure capacity

Barham is not identified as a growth settlement. SLAA062 contradicts the emerging spatial strategy.

### **3.2 Landscape and AONB Protection – Policy NE2 (Emerging)**

Policy NE2 strengthens protection for the AONB and its setting. SLAA062 would:

- Erode rural character, the demise of Barham village in terms of its current size and scale.
- Introduce suburban lighting
- Harm landscape quality

This is incompatible with the emerging policy direction.

### **3.3 Climate and Water Management – Policy CC2 (Emerging)**

The emerging plan emphasises:

- Water scarcity
- Chalk stream protection
- Sustainable drainage

The Nailbourne River, a sensitive chalk stream, is at risk from increased runoff and pollution.

SLAA062 is therefore inconsistent with CC2.

## **4 Conflict with National Planning Policy Framework (NPPF)**

- AONB Protection – NPPF 176–177

The NPPF requires great weight to be given to conserving AONB landscapes. Development on SLAA062 would:

- Harm the AONB setting
- Urbanise open countryside
- Introduce light pollution

This is not consistent with national policy.

### **4.2 Sustainable Development – NPPF 8 & 11**

Sustainable development requires:

- Accessible services
- Safe transport
- Environmental protection

SLAA062 fails all three pillars.

### **4.3 Infrastructure Capacity – NPPF 20 & 34**

The NPPF requires plans to ensure:

- Adequate infrastructure
- Water supply
- Sewer capacity
- School places

Barham cannot meet these requirements and this additional development will add a burden to an already over prescribed infrastructure..

#### **4.4 Soundness Tests – NPPF 35**

The allocation of SLAA062 would be:

- Not justified – no evidence of local need
- Not effective – infrastructure cannot support it
- Not consistent with national policy – AONB harm
- Not positively prepared – ignores constraints

Therefore, the site cannot be included in a sound Local Plan.

#### **5 Cumulative Impact with Recently Approved 22-Home Scheme**

Barham has already absorbed 22 new dwellings at Barham Court Farm. Adding another 24 homes would represent a 48-home cumulative increase, which is:

- Disproportionate
- Unsustainable
- Harmful to village character
- Unsupported by infrastructure

This cumulative impact has not been assessed in the SLAA.

#### **6 Erosion of Village Character and Identity**

Barham is a traditional English village with:

- A registered village green
- Historic layout
- Rural setting
- Distinctive landscape character

Incremental development of this scale results in:

- Suburbanisation
- Loss of rural identity
- Visual intrusion
- Light pollution
- Increased traffic and noise

This is contrary to Local Plan Policy DBE3 (Design and Local Character).

#### **7 Conclusion – SLAA062 is Unsound and Must Be Removed**

For the reasons set out above, SLAA062:

- Conflicts with the adopted Local Plan
- Conflicts with the emerging Local Plan
- Conflicts with the NPPF
- Fails the tests of soundness

- Harms the AONB
- Overloads infrastructure
- Damages village character
- Is not sustainable development

**SLAA062 should not be allocated or supported in the Regulation 19 Local Plan.**

I respectfully request that Canterbury City Council remove SLAA062 from consideration and confirm that Barham will not be subject to further inappropriate greenfield expansion.

For all the reasons set out above, the proposed allocation or future development of SLAA062 is unsound, unjustified, and inconsistent with national and local planning policy. It would cause demonstrable harm to the Kent Downs AONB, the rural landscape, local infrastructure, the historic character of Barham, and the environmental integrity of the Nailbourne valley.

Furthermore, those who support or approve such a scheme must recognise the direct responsibility that accompanies such decisions. Approval of this development would:

- Destroy irreplaceable habitat and diminish local biodiversity
- Erode the fabric of a traditional rural landscape, undermining the historic identity of Barham
- Accelerate the creeping suburbanisation of the Nailbourne valley
- Contribute to a pattern of incremental expansion that, if repeated, will ultimately result in one continuous urbanised corridor, contrary to the principles of sustainable rural settlement planning

These outcomes are not theoretical; they are the predictable and permanent consequences of permitting inappropriate greenfield development in sensitive rural locations.

The Local Plan must not facilitate or legitimise this trajectory. SLAA062 should therefore be removed from the Local Plan and excluded from any future allocation or development consideration with the context of the existing development of 24 houses.

I respectfully request that Canterbury City Council delete SLAA062 from the Regulation 19 Local Plan and confirm that Barham will not be subject to further inappropriate greenfield expansion.

Yours faithfully,

Jon Dyer