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Sent: 18 May 2026 16:28
To: Consultations
Subject: Draft Local Plan Comment

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Dear Inspector

Thank you for looking into detail at this Draft Local Plan.

My objection is threefold.

1.The Legal requirement of community involvement:

There has been a distinct lack of real commitment to listen to residents' views at the earliest stage. (Policies brought forward are included here.)

At the meeting to decide the 2017 Local Plan there were many residents in attendance. Unfortunately the Chair had a bad cold and cough. When those who had been given a three minute slot to speak approached the third minute she shouted for them to stop immediately yet each Councillor was able to express his or her views at length without the indignity of the Chair shouting at them. (It was obvious to us all the poor Chair was pushing the meeting along to get the job done before her voice gave out.)

When something as important as building 4,000 houses on the rarest soil type in the UK means something to people, surely they should be allowed to conclude their views (perhaps even 20 seconds after the third minute?) particularly when the number of Councillors 'for' and those 'against' were so close (with a few abstentions) yet was finally decided by Councillors who did not even live in Canterbury.

This however was nothing compared to what happened in 2022 when an application for 200 houses on the same fields was put forward by Rydon Homes (who had been banned by the Secretary of State a few months earlier (26 December 2021) from the Government's 'Help to Buy' scheme "with immediate effect" due to Rydon's involvement in the cladding of Grenfell Tower.) We wrote objections to the planning department at Canterbury City Council but our comments were redacted. This is despite a planning notice (on a gas inspection site beside the fields) saying 'Have your Say' !

The Secretary of State said it would be "against public interest" to allow the developer "to sell homes via the Government scheme." This was even before the outcome of the Grenfell Inquiry due to "concerns over unacceptable business practices in their company" yet Canterbury Council had accepted an application for 200 houses to be built by this company and residents who expressed their moral outrage due to the 72 deaths involved in the Grenfell fire, had their "Have Your Say" views redacted. (What had been redacted was a quote from the Government's own website.)

Please note - only one single planning notice had been put up on a gas inspection site well away from any public path, yet five notices in prominent places along the same road had been put up by the Cricket Ground to increase their hours.

Further, in May 2024 Rydon changed its name to B.Yond Homes and put in a new application to Canterbury City Council for the same number of houses on the same fields in the summer of 2024. A letter from Planning dated 4th August arrives on 18th August. Comments to be in by September 6th. After talking to a neighbour it became apparent that despite her commenting on the previous application she had not received a letter. We asked other neighbours who had also commented. No they hadn't received letters either.

Please note - there were NO notices put up anywhere. Not one.

I had to quickly make 200 copies of my letter and we began posting and knocking on doors in the neighbourhood. Very few people knew about it even those who had commented previously hadn't received a letter.

The above contradicts NPPF 16c, *'Plans should...be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses....'*

and also contradicts NPPF 16c, *'effective engagement'*.

(Only after contacting our local councillor, who also happened to be on the Planning Committee, was the date extended and she was "assured" letters would be sent and planning notices put up.)

In the end the application was rejected but not apparently due to the number of objections but because of a "legal technicality" between B.Yond Homes and the developer involved in the Mountfield development.

2 That previously developed land will be prioritised for development.

The description 'Canterbury Urban Area' is misleading as the majority of this area is prime agricultural land that takes generations and generations to create. Yet this same land is "the principal focus for development in the district."

How can site C10, an area of prime agricultural land used for crops, animal husbandry, fruit growing and previously used for hops, be the principal focus for development when the statement *'Previously developed land will be prioritised for development'* has been made?

The map in the Draft Local Plan does not explain the topography or the 'feel' when on foot. Only a walk out from the city can do this. Then one can see how rare an experience

it is to have such productive land so close to the centre of Canterbury and how lucky we all are.

In the Government's 'Land Use Framework' published in March 2026 soil is recognised as one of our greatest natural assets.

Around 95% of our food depends on the soil yet this has been ignored by including the vast acreage of fields in South Canterbury as well as the greenfield sites also in this Local Plan.

The mention of 'soil' has not come up once in this draft yet it is the invisible yet crucial aspect that if it's lost cannot be replaced and which the Government itself in the executive summary of its commissioned independent review into the food system - National Food Strategy - has accepted as one its strategic objectives to "make the best use of our land."

In this framework there are 10 goals. Six of these refer to soil, highlighting its importance in a National Soil Map which the Government states is "vital" and "critical to ensuring soils are properly embedded in our thinking and decision-making."

The site C10 is not simply 'land' but made up of a complex and biodiverse ecosystem the Government is highlighting, in which our farmers have been growing crops and fruit for the local and national population. The soil is also a terrestrial carbon store and as such is part of the Government's commitment to its target of Net Zero and crucially in this instance at South Canterbury C10 the soil manages our water. The amount of rain water absorption of this large area of open farmland and its elevation has not been taken into consideration. I could not find a surface water management plan or flood risk assessment. This is contrary to NPFF guidelines.

This also applies to the sites C1-C11 carried forward from the 2017 LP.

All of the above is also contrary to the Environmental Improvement Plan of 2025 where the Secretary of State said:

"From the green spaces that improve our health to the quality of air we breathe, to the water we drink, to the soil that grows our food – our environment shapes who we are as a nation. It underpins our economy, our wellbeing, our very sense of place. When the environment thrives, we thrive too.

That is why this government is publishing a revised Environmental Improvement Plan – a roadmap for restoring England's environment over the coming years. The plan sets out measurable commitments across every priority – from cleaner air and water to thriving wildlife and resilient landscapes.

Her words are not echoed in this plan where so many greenfield sites have been included. This again is contrary to the NPFF guidelines particularly *"to protect and enhance our natural, built and historic environment; including making effective use of land."*

The Secretary of State continues in this paper that “we need to manage competing pressures on our limited land and water, integrating environmental action with our Plan for Change to grow the economy and make real improvements to the lives of working people.”

To do this this Draft Local Plan must surely be looked at again. And it is not justified that it “*places significant weight on the benefits of improving access to education at all levels*” when it is planning to build on the most crucial asset for education (and well-being) that we have here in Canterbury - the land itself.

It does not support a golden opportunity of hands on education in farming with work experience not only for the nearby Simon Langton Schools and St Anselm’s but for other schools as well as courses in horticulture or simply volunteering to “dig” for Britain and your mental health!

It should support the Government’s statement that “*Finally, we are putting people at the heart of our plan by increasing ‘access to nature’ (goal 10). We know spending time outdoors and connecting with the natural world is good for our physical, mental and emotional health.*”

No this plan quashes any such opportunity and will take away the ‘access to nature’ goal the Government has put forward and contradicts NPPF 8.

In summary the Draft Local Plan with its inclusion of so many greenfield sites is at odds with the Secretary of State’s vision where Nature enables economic growth as well as public and mental health, with green industries as well as what she describes as a “health mission” which is about prevention with access to clean air (goal 2), water (goal 3) and green spaces, supporting people “to live longer healthier lives” which she believes will ease pressure on the NHS. It contradicts NPPF 8
‘to protect and enhance our natural, built and historic environment; including making effective use of land.’

3. Heritage

Building on C10 in particular will dramatically effect Canterbury nestling as it does in a green valley, views from the orchards known throughout the world and recognised by UNESCO. This contradicts NPPF paras 202 and 203, and NPPF 205 HE4,1.

Here is a photo taken this morning from these orchards to illustrate this point:



Thank you for considering all the above.

Yours sincerely

Penny Tyler

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