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I am writing with comments relating to the draft Canterbury District Local Plan 2040 ("Plan") as a resident in Barham. My comments are in respect of Policy R13 – Land adjacent to Valley Road

My comments link to various aspects of consistency with paragraph 36 of the National Planning Policy Framework ("NPPF").

Is the Plan positively prepared – demonstration of need

There is no evidence of "need" for this development in Barham, which is a requirement for the Plan to be deemed "positively prepared". There is little local employment, the school is over-subscribed and already required to support the previous development at Aylesham. There is a requirement imposed by Government on Canterbury City Council to provide new housing, but that should be centred on the city and its surrounds where sustainable transport solutions would be more viable. The current Barham Court Farm development (Policy CF2) is already providing 22 new dwellings in Barham for which there is little evidence of local need. To include provision for a further 24 dwellings in the Plan is not consistent with local need and represents an over development in a relatively small village.

Is the Plan positively prepared – sustainable transport

Paragraphs 109-118 of the NPPF sets out the need for plans to consider sustainable transport solutions at an early stage. Barham is not well served by public transport and there is no consideration of that in the draft Plan. This would suggest this potential development will lead to an increase in use of private vehicles on the roads. There is very little local employment, which means residents being required to travel for work. There is a local shop, which provides a good service, but is not adequate for all needs and, hence residents will be required to travel by road for supplies. This does not meet the objective of promoting sustainable transport and limiting the need for travel.

Is the Plan justified

Barham is in the Kent Downs AONB. The farm building development described as Barham Court Farm site (Policy CF2) is currently being redeveloped as housing. This site was no doubt designated as "brown field", had been in disuse for some time and, therefore, fitted with Government planning policy as a suitable site for redevelopment, notwithstanding its close proximity to a Grade I listed church and the Barham conservation area. The land being proposed

for inclusion in the Plan is farmland, not brownfield and is therefore inappropriate for delegation for such development.

Barham also already suffers from other inadequate services. The waste drainage capacity is insufficient for existing demand; whenever the Nailbourne flows, which is virtually every year now due to the increasingly wet winters, there is a need for the waste water drains to be pumped out due to backflow into local residences. In addition, there are regular power cuts in the village, which suggests there is inadequate local grid capacity. Without a strategy to address these limitations the proposed development would not be appropriate.

Also, in considering appropriateness of the draft Plan, currently no consideration has been given to the traffic flows and the capacity of local roads to accommodate more traffic. The village is served by Valley Road and Church Lane. The A2 can be accessed from either, but local experience would suggest that the majority of local residents access the A2 via Church Lane. This is also the route for accessing other local conurbations such as Folkestone, Sandwich and Deal. The Barham Court Farm development is split with roughly half of the new properties exiting and entering the site to the East, they will likely travel up Church Lane towards the A2 and will not pass through the village. The other half will exit and enter that development through the proposed Policy R13 site on Valley Road. Like many existing residents they are likely, therefore, to use Church Lane for many of their journeys. Both the Barham Court Farm development and any proposed development under Policy R13 will increase the road traffic along Church Lane between Valley Road and St John the Baptist Church, Barham. This road, which is very winding in places, passes a number of listed properties and several 18thC and older dwellings. These properties were not constructed to withstand such vibration and the road is very difficult to navigate when there is traffic flowing in both directions. To consider further development on Valley Road would require a more considered traffic management scheme for this part of the village, which is absent from the draft Plan. The layout of properties and roads is just not suitable for increased traffic. The already planned development and this proposed addition would result in 40+ new dwellings and therefore potentially 80+ additional cars in the village.

Changes required

I believe the most appropriate means of providing for the required housing within the geographic area of covered by Canterbury City Council is for contiguous development of conurbations such as the City itself. This would provide a solution which would most readily restrict unnecessary travel, link to existing public transport networks and be able to be supported by adequate services such as waste water management and power. There is no case for need in Barham. The local school is already well attended and there are very few local jobs. The need for housing is clearly in those areas close to areas of employment.

Despite the absence of a case for need, for further development within Barham to be justifiable, the following would also have to be addressed:

- Provision of alternative school places locally for those children who would no longer be able to attend the primary school in Barham due to places being taken up by new residents
- Solution to the traffic management to reduce the volume of traffic that will otherwise use Church Lane to access the A2
- Upgrading of waste water management and electricity supply capacity to accommodate the additional demand arising from the new homes

- Need for increased public transport services to mitigate the use of private cars to access work and shops.

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