

Objection to CA/23/00379 - Land South of the Thanet Way

29th August 2023

This objection has been prepared by Cllr Chris Cornell, a ward councillor for the site of an outline application for the erection of up to 220 dwellings (CA/23/00379).

The comments below relate to the amendments made to the initial application since early June 2023. Objections made by myself and Cllr Val Kenny (Gorrell councillor up until May 2023) submitted on the [4th April 2023](#) still stand, however we acknowledge and appreciate efforts made since to:

- Identify a safe means of exit from the proposed park and ride
- Specify additional safety measures (including the installation of a toucan crossing at PROW 60) to help pedestrians cross the Thanet Way
- Review and lengthen the southern arm of the proposed roundabout at the site entrance to improve traffic flow
- Provide more detail on the loss of air quality and mitigate this with a CIL contribution
- Improve cycling infrastructure between the site and Millstrood Road

We acknowledge that new bird surveys (requested by CPRE Kent), modelling on hydrology flow rates (demanded by KCC Flood) and information on reptile mitigation (demanded by KCC ecology) have also been provided.

In this note we wish to add new objections on the grounds of:

1. the residual cumulative impacts on the road network particular along the Thanet Way
2. the loss of irreplaceable habitats and damage to marine ecosystems through residual run off
3. The plan will make a material change to the open plan character of the area

Transport Concerns

In our previous representation we acknowledged the previous transport assessment failed to take into consideration the impact that residents crossing the Thanet Way to queue for a bus would have on the flow of traffic. We raised concern that the assessment already acknowledged people would inevitably retime their trips because congestion would reasonably affect the roundabouts at Borstal Hill and Millstrood Road. We still believe the capacity of the roundabout at the entrance of the site is insufficient.

It is now our objection that the transport assessment needs to be recalculated to take into account the effect of changing the arms on the roundabout, the installation of a toucan crossing at PROW and the impact of the park and ride on the site.

The previous modelling did not account for the visits to the park and bus site because it argued that these were journeys which would have already been taken along the Thanet Way but the

proposal for a short 'left only turn' slip road onto the Thanet Way will only cause cars to back up onto the roundabouts in a way with increases air pollution and has a severe residual impact on the road network. The theoretical capacity of the junction cannot be accurately assessed without this information.

Whilst we understand that detail as to how the park and bus site will operate is yet to be finalised we believe that it is the responsibility of the developer to get clearer commitments from either Stagecoach or the council on how any bus service will operate, so that they may discharge their duty to provide active travel options. Without more clarification it is ludicrous to believe that they will be able to make a 10% increase in the use of active travel in the first five years of the scheme as they claim.

Whilst we appreciate the efforts made to increase cycling provision toward Borstall Hill we agree with comments from SPOKES that wider pavements at the roundabout might slow car speeds into the new estate and make it safer for cyclists crossing to the 3m wide cycle path on the North side of the Thanet Way. In fact, we'd even question whether the small traffic island proposed on the west entry to the roundabout is wide enough to safely move a cycle onto whilst crossing two lanes of traffic and whether a 1m pavement (on the South Side of the Thanet Way) between the roundabout and toucan crossing might be a safer way of encouraging cyclists to make use of a safer way to cross.

We concur with comments from Canterbury City Council's transport team that more could be done to link cyclists with the Crab & Winkle cycle path to the east of the site and that cycle access routes through the adjoining site to Golden Hill need to be mapped and photographed.

Habitat Loss

Whilst new information has been provided on the native species on the site it is clear that both Kent County Council's Ecology Advice Team and Kent Wildlife Trust have concerns. We can not see green fields lost without ensuring biodiversity is also not damaged.

Of note:

- both parties believe that the claim that the site delivers a 20% uplift in biodiversity net gain cannot be corroborated until more detail is provided on the resiting of reptiles on the property which will reduce the overall net score.
- Kent Wildlife trust disagrees with the Environmental Impact Assessment by Aspect Ecology (dated July 2023) that the site should not be considered a suitable briefing site for skylarks. Whilst information is provided as to the dates on which a bird survey was carried out, no data as to the number and species of birds counted on each walk is provided (in notable contrast to the information presented on other animals). Without this information it is impossible to distinguish if skylarks are at risk.
- The appendix to D8 including the Kent Design Guide indicates that the developer has no intention of using native species in landscaping despite the prevalence of animals on site. Both providers have highlighted the importance of complementary habitats for hares on

the site. There is no detail as to the minimum number of enhancement features (bat boxes, mammal holes, hibernacula) which will be delivered - this is key to determining the viability of the site and not suitable to a reserved matters application

- A 20m wide buffer zone needed to protect the environmental value on Duncan Downs has not been guaranteed to the west of the site with no information provided on the planting of the semi-natural and natural areas on the map.

Whilst additional information has been presented on the drainage runoff times in smaller storms, Southern Water(28th August) is now requesting additional information on the timetable for implementation of Sustainable Urban Drainage Systems (SuDs) on the site and their review by the planning authority.

Southern Water acknowledges it should be able to deal with sewage but cannot make a decision on the impact the site will have on surface run off until this is provided. Information still missing includes:

- The location of smaller parcel SUDS used for approximately 30% of the drainage on site. Larger SUDS are shown
- Clearer detail on the proportion of tarmacked areas that will be semi permeable
- Details as to capacity and permeability of network of channels and gullies to the North East of the site which the SUDS will leach into

The information presented by Odyssey (dates July 2024, Addendum 4), directly challenging the assertion from Thanet Way Residents Association that the sewage network can not cope, does indicate that the use of combined sewer overflows is legal, it but does nothing to show whether they are safe or the effect that they have on the marine environment. This information is available through the [Council's Citizen Science](#) project which has shown abnormally high levels of E-Coli linked to CSO use in August and evident through the involvement of the Environmental Agency in demanding improvements throughout the catchment.

Detailed information on the use of sustainable drainage needs to be provided to ensure no marine habitat damage.

Character Assessment

An addendum to the original visual impact assessment assessment completed in July 2023 by LDA Design acknowledges that the site falls outside of the current settlement boundary, is out of keeping with the Canterbury Landscape Assessment and Biodiversity Appraisal and will see the loss of open space. It contends the development will maintain the existing pattern of ridgeline development through planting but gives no indication of consideration given to how the topography of the site will affect the site lines, particularly from Whitstable toward the Blean Woods Special Landscape Area.

Whilst the massing of the site has been considered we believe that the proposed location of the community venue (up to 3m tall) will be imposing to residents in the road opposite and have only

been compared to the current ground height and not the new ground heights which will change with the reprofiling of the site.

In summary we believe this outline application lacks the detail needed to instil public confidence that wildlife will be protected and vital habitats protected. We believe that it still indicates the site will see a substantial increase in the traffic along the Thanet Way which will damage local business and be unsuitable without a significant upgrade in the capacity of junctions and infrastructure. We believe that the profiling of the site in the way recommended will see a massing of buildings which will destroy the character of the Thanet Way and the green corridors that surround Whitstable.

Cllr Chris Cornell

chris.cornell@councillor.canterbury.gov.uk