



The countryside charity

Kent

Matter 1 - Legal Compliance

Issue 4 – Climate Change

Q1 Is it clear what is required of proposals for new development under Policy SP1? Is the policy effective?

Q2 Does the Plan (taken as a whole) include policies designed to secure that the development and use of land in the area contributes to the mitigation of, and adaptation to, climate change? If so, how?

CPRE Kent is of the view that it's not clear what is required under Policy SP1 in terms of the Council meeting its aspiration of becoming a net zero carbon emitter by 2030 at the latest. And that the Plan does not go far enough in terms of mitigation and adaptation to climate change.

In terms of the Council's strategy, it would appear that climate change considerations are not actually at the heart of its spatial strategy. That is, land is clearly being allocated for development in locations that do not appear to reduce the need to travel by car, for instance.

For example, if the Council is unable to demonstrate that the allocation of land at Elvington and Eythorne will not result in reducing the need to travel – being a strategic allocation for 300 homes at a pair of large villages (with a corresponding lower tier of services and facilities) - then what will the policy test/benchmark be for other proposals for new built development in terms of measuring the effectiveness of the policy?

The mitigation tests set out in the policy are laudable as a matter of principle in terms of fine tuning, but don't address the underlining issue that development should be sustainably located in the first place.

CPRE Kent's view is that if the District is to be a net zero carbon emitter within the next seven years locational issues (and access to services) should be embedded in the Council's strategy. Climate change reduction measures should not be left solely to development "add-ons", when the principle of the location of development should be the prime consideration.

In terms of policy effectiveness, it is ironic that with so many homes to be allocated on green field sites (where green infrastructure will be destroyed), that there is a requirement for "maximising green infrastructure and exploring nature-based solutions to climate change" (AM4).

CPRE Kent - The Countryside Charity

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CPRE Kent would like to see the Plan modified to exclude the strategic allocation at Elvington and Eythorne and more emphasis placed on brownfield land development and those areas of the District where communities are not car-dependent.