

Introduction

1. This document has been prepared by me as a private resident of Tenterden.
2. Though the local plan has been positively prepared and consistent with national policy, I should like to comment on the general questions relating to issues 15, 16 and 17.

Topic Policies – General Questions

i) Does the Local Plan, when taken as a whole, include a strategy and policies designed to ensure that the development and use of land contribute to the mitigation of, and adaption to, climate change?

3. DEFRA 2015 Air Quality Plan states that air quality should comply with national air quality standards by 2020. The Council has a legal obligation to meet EU directives on levels of air pollution. Recent evidence on the health impact of exposure to nitrogen dioxide (NO₂) has significantly strengthened.
4. Exposure to high concentrations of NO₂ causes inflammation of the airways, decreased lung function and respiratory symptoms. Recent evidence has been released directly linking NO₂ exposure to mortality. Applying this evidence to the exposure levels across the UK suggests that exposure to NO₂ is increasing mortality by the equivalent of 23,500 deaths per year (within the range of 9,500 to 38,000 deaths). It is beyond dispute that poor air quality and the health effects of particulate matter are a major influence on public health.
5. Tenterden currently has a poor commuting infrastructure caused by known major traffic congestion pinch points.
6. Increased traffic movement will have a chronic impact on current traffic flow leading to greater congestion and air quality pollution in Tenterden. Interruption of traffic (stop/go and severe slowing of traffic speed (to between 10 and 15 km/hour) substantially increases the level of emissions. A reduction from an average speed of 50 km/hour to 10k/hour doubles CO₂ emissions from petrol and diesel cars (Based on Euro 4 data) and NO_x by at least 50%.
7. Being an old town, there is a large amount of "on road" parking on artery roads on the East side of town towards the high street and also the A28. This causes serious congestion and gridlock during rush hours as it is not possible for a two way flow of traffic. There is no solution.
8. The school run for Homewood School and St Michael's Church of England Primary School on A28 causes serious gridlock and will get worse with new mums from Tent 1 and Tilden Gill. The only solution is to physically move both schools to a new location.
9. All road arteries East and West into the town of Tenterden have to go through the high street, as there are no alternative routes. The High street today is often at a standstill and with additional traffic from Tilden Gill and Tent 1 shoppers plus extra commuters it will become gridlocked. With Tenterden's physical geography, there are no resolutions to devise alternative routes.
10. The effects of air pollution on human health cannot be ignored and all efforts should be made to improve, not add to, the ambient air quality in Tenterden.
11. It is essential that polices such as separation of settlements that preserve green lungs around towns and villages are strictly enforced to help mitigate pollutants.
12. Before any new major housing developments are considered in the next round of five year housing supply reviews, there must be a mandatory mitigation plan to halt, but ideally reduce congestion, plus provide affordable, daily and quality transport to the majority of employment locations.

13. To rely on mitigation measures dealt with by conditions in individual planning applications completely fails to address the cumulative impacts of allocating these large sites within the Local Plan.
14. Landowners, the borough council and town council should be encouraged to plant trees as they are very efficient at removing gaseous pollutants such as nitrogen oxides, ozone and particle emissions from cars, by absorbing them with normal air components.
15. There must be a designated network of open space that acts as a green lung, ideally from the centre of town into the countryside. Utilising designated conservation areas, landscape character areas, wildlife sites and biodiverse opportunity sites would be an easy and obvious first step.
16. All the serious and irresolvable traffic congestion and gridlock adds to the local pollution that contributes to climate change. There is at least one site within Tenterden known as Limes Land that should be a designated local green space, which meets all the criteria as part of the open space network

ii) Policies TRA3a, ENV2, ENV3a, ENV3b, ENV4, ENV9, COM2 and COM3 and a number of individual site policies refer to various SPDs, other Council strategies or documents prepared by other organisations. As these are not part of the development plan and are subject to change without examination, is requiring compliance with them justified and consistent with legal and national policy requirements? If not, are there another ways of expressing the Council's intended approach within these policies?

17. SPDs are an essential method to add important granularity that would prove difficult to include in all the necessary sections of the local plan. However, like all good plans, necessary controls need to be put in place to manage changes within each SPD.

iii) Does the Local Plan, when taken as a whole, adequately promote the health and well-being of the community?

18. Beside point (i) above, I do not have sufficient information to comment.