

To: Canterbury City Council Consultations

consultations@canterbury.gov.uk.

From: Shirley Thompson, MBE

Re: Consultation for Canterbury District Local Plan to 2040

I strongly object to policies W3 and W4 (Brooklands Farm) of the draft Local Plan to 2040,

My primary concern is the seriously negative impact on Biodiversity, and in particular on bat populations. The planning authority has a legal obligation to consider whether bats are likely to be affected by a proposed development. If a survey has not already been undertaken to determine the potential for bats on site and/or the presence of bats, the developers should be commissioned to undertake an appropriate survey.

The planning authority should not grant planning consent subject to future bat survey work as the findings of that survey might otherwise materially change the consideration of the development.

If a survey demonstrates that development is likely to affect bat foraging and/or commuting habitat then linear features such as tree lines should be retained, and enhancement should be considered wherever possible.

Making planning decisions without due consideration of priority species is contrary to the Natural Environment & Rural Communities (NERC) Act 2006 which applies to all public organisations, including local authorities.

s.40 of the Act states "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."

Under s.41 of the Act, bats are listed by Defra as a priority species for the conservation of biodiversity.

Other non-wildlife impacts of concern:

Demand for water and pollution in rivers and streams.

Swalecliffe sewage works already unable to cope with existing demand.

Permanent destruction of the rural nature of the valley of the Swalecliffe Brook, which provides the unofficial Green Belt between urban Whitstable and The Blean.

As a long-term resident of Tankerton, I strongly object to this development.

Yours sincerely

Shirley A Thompson. MBE