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PLEASE NOTE: THE WEBSITE DID NOT SAVE MY TEXT. HOW MANY PEOPLE'S SUBMISSIONS WERE LOST DUE TO SITE ERROR?

A Local Plan must formally acknowledge its alignment with the global targets on climate and biodiversity to which the UK Government is party to, as set out at the UN COP27 (2022) and the UN Biodiversity COP15 (2022). The Council's house building targets and road building programme will be acting against these targets and so I am totally against the proposals set out in the draft Local Plan. I am strongly opposed to using agricultural land for developments.

Policy SS3 – Development Strategy for the District indicates 'An average of 1,252 new dwellings per year' for the District. This is excessive and unsustainable. The Housing Needs Assessment undertaken by Edge Analytics in September 2021 recommended as a baseline of 806 households per year for the District. The summary of Options Carbon Emissions CDLP2040-CC06 makes clear that 'year on year emissions from constructing new development and transport infrastructure plus the operational emissions from heating and powering the new buildings (operational emissions) evolve over the period of the plan.' greater housing = greater emissions. This is unavoidable. The Council's intended levels of growth will place pressure on existing infrastructure; roads, schools and water supply. Housing developments and road building is being prioritised above environmental, ecological and social concerns of Canterbury residents. Increasing housing beyond the recommended baseline makes the proposals incompatible with the Council's pledges to cut emissions and achieve net zero by 2030. Both in the Declaration of a Climate Emergency of 18th July, 2019,⁵ and the Canterbury City Council Climate Change Action Plan 2020-2030, the pursuit of excessive house-building and subsequent road-building, the Council would fail to honour its own commitments to cut emissions.

The CC should set out a response to the proposed amendment to policy NC21 of the Levelling up and Regeneration Bill, tabled by T. Villiers MP in November 2022, which 'requires a revised NPPF within six months to provide that housing targets are advisory'⁸ and not mandatory. We also urge the City Council to respond constructively to Secretary of State for Levelling Up, Housing and Communities, Michael Gove MP, in his pledge that housing targets should be 'an advisory starting point, a guide that is not mandatory,' and that 'It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area – be that our precious Green Belt or national parks, the character or an area, or heritage assets.' Furthermore, the Secretary of State offers 'transitional arrangements' of two years, which should be accepted by CCC in order to revise the excessive housing figures.

The ring road/road upgrading and zoning plan for the city is untested and authoritarian imposition on Canterbury which is to be paid for by huge amounts of housing. It will lead to the destruction of residential areas such as Harbledown and Rough Common. Has the draft plan even passed the test of soundness set out in the National Planning Policy framework?

As a matter of urgency there needs to be an improvement to the bus timetable, more local buses connecting different parts of the city (such as a direct link between the Sturry road and St Dunstons/Whitstable road). A regular bus service that continues until 10pm would greatly benefit High street hospitality venues/amenities. This will serve the wider community of all ages and abilities, since cycling and walking is not available to all.

C16: CANTERBURY EASTERN MOVEMENT CORRIDOR (THE EASTERN BYPASS)

I have a strong objection to the proposal to construct a bypass from the A28 near Sturry through to the A2 at Bridge as part of the Canterbury Circulation Plan. The proposed route would clip the north-eastern corner of the SSSI and cut through the northern section of the golf course, destroying ancient woodland and wet woodland in its wake. It would also sever ecological connectivity between the Old Park & Chequers Wood SSSI and the Fordwich Water Meadows. In addition I am concerned about the likely impact an eastern bypass on Fordwich and the priority habitats in the Trenley Park Local Wildlife Site. The Plan should protect the SSSI from any form of road development and adequately buffer it from any impact related to housing/roads.

C15: Housing development at Canterbury Golf course

The proposed development of approximately 74 houses on the driving range of the Golf Course raises a number of serious concerns for Old Park & Chequers Wood as this site immediately abuts the SSSI (Site of Special Scientific Interest) and threatens the chances of creating an effective environmental buffer around the SSSI. The adjacent land is also prime nesting site for the endangered nightingale and turtle dove so is extremely environmentally sensitive.

Direct impacts of development on the driving range include:

- Noise, excavations, dust, and heavy lorry movements from construction
- Urbanisation and disturbance of habitat by increased human activity (long term)
- Noise from residents, music etc.
- Traffic movement & fumes from vehicles and central heating
- Disturbance to wildlife from light pollution
- Smoke from BBQs, wood burners, bonfires
- Predation of nesting / feeding nightingale and turtle doves by pets (notably cats and dogs)

If the Golf Club relocates the driving range onto adjacent non-SSSI land there would be additional impacts.

These include:

- Loss of key habitat for nesting turtle dove, nightingale
- Loss of key habitat for reptiles
- Loss of habitat for the nationally rare clove-scented broomrape

The council should support an application to Natural England to extend the SSSI to cover the whole of Old Park, Chequers Wood, Realm and Timpson woods and most of the Golf Course. Policy SS1 (1.8) The Council should continue to work with partners to explore the promotion of a Stour Valley Regional Park. I am very concerned that the proposed construction of the Eastern Movement Corridor in C16 will sever ecological connectivity between the Old Park & Chequers Wood SSSI and the Stodmarsh SSSI / Ramsar site. Both of these sites form part of the Lower Stour Wetlands Biodiversity Opportunity Area, as mentioned in the Canterbury Landscape Character Assessment and Biodiversity Appraisal (part of the evidence base for the Local Plan 2045), and every effort should be made to improve green and blue infrastructure in this Biodiversity Opportunity Area and prevent any further damage to it.

Maria Pacan

