

Dear CCC,

I am writing in response to the consultation call regarding the CCC draft local plan 2045.

Prior to raising specific concerns and objections to the current draft plan, I would like to urge the Council to pause the Plan whilst awaiting Mr. Gove's new version of the NPPF. Since the Local Plan will need to comply with this, why waste time forging ahead on the basis of this plan, only to then have to rework it? We already know that the original requirement to deliver a specific number of dwellings has been dropped and many councils have responded to this. More changes are inevitable. Additional time will allow the council to assess the impact of inflation, cost of living, mortgage rates, hybrid working and changes in student numbers on the potential housing market. The current Plan fails to factor these in and is based on an inadequate housing needs assessment.

My overriding concern about the Draft Plan is the way in which the proposed scattergun approach to adding on housing to multiple current areas of development, uncannily links to the proposal to build a new traffic system within and without Canterbury. My comments relate primarily to the aspects affecting the Canterbury area, which I know best. The transport proposal is in conflict with the CCC zero carbon policy and whilst the proposed new roads and systems would make cycling and walking in central Canterbury more pleasant for those able to, it would make life much harder for a significant number of residents. Consider walking / cycling to central canterbury, shopping and returning in a reasonable time frame with 3 or more small children, even if you are able bodied and in good weather. And given the high proportion of older people in Canterbury, they too will be disadvantaged. Only 12% modal shift was achieved in Ghent(where the conditions were much more likely to generate good outcomes) so the impact in Canterbury is likely to be much more modest, whilst increasing massively the mileage (and consequent environmental impact) travelling in and out via the outer ring road. In addition, the costings for these road developments are unrealistically low; hence I challenge whether this Plan is effective. I note that in your Transport Topic paper, you report that there has been an overall reduction in overall traffic flow in Canterbury inner ring road 2008-2019. Whilst car trips decreased, HGV and LGV deliveries increased. This begs the question of the need for an external ring road , but it does invite innovative ways to coordinate the delivery of goods linked to internet shopping.

Similarly, the Plan fails to meet the requirement for it to be positively proposed and effective given the lack of agreement with neighboring boroughs regarding proposed developments e.g. with Dover regarding Aylesham proposal, which would require funding from Dover District Council .

There is an inherent risk of losing World Heritage Site status if there is a continued chipping away at the immediate and distal environment linked to the 3 Heritage sites. Maintaining this status is central to meeting the economic and environmental requirements of sustainable developments.

In terms of the third overarching objective, the social objective, scant attention in the plan is given to the needs of the "current " communities. No mention of the impact on the social environment for current residents whose social and physical environment would be significantly affected by the proposed developments. It is mentioned that the proposed circulation plan aims to be introduced in a way that is "attractive for visitors, businesses and visitors." What about the residents? A typo or a Freudian slip?

The NPPF requires that the development of sustainable communities attend to the social, environmental and economic objectives in mutually supportive ways. If there continues to be an

intention to build over 31,000 dwellings, I urge re-consideration the option of developing 2 or 3 new sustainable communities Of 7-10,000 dwellings, attending to all 3 objectives together from the beginning. The current Plan of multiple developments adjacent to current housing, will lead to fractured and unbalanced communities. And with much of the sewage infrastructure already overburdened to a dangerous level, just tacking on extra housing is heading for environmental disaster.

I would urge the Council to pause this plan.