

## Comments on Local Plan

### HOUSING TARGETS AND DEVELOPMENT SITES

I wish to formally object to the proposed number and location of houses put forward in the Draft Local Plan.

The government requirement of 1120 houses per year, has been increased to 1263 per year and these are predominantly located within and around the city of Canterbury – with an unsustainable concentration of proposed developments to the east and south of the city. This will effectively double the population of the city and extend its built-up area far into its rural surrounds.

This would seriously damage the quality of Canterbury as a small cathedral city, threatening its internationally significant heritage assets including three World Heritage Sites. The Council has not even been able to protect its existing heritage assets. In recent years the city has lost its Heritage Museum, the Castle has been closed and not maintained, Dane John Mound is in serious disrepair and many historic buildings in Canterbury are showing extreme neglect. Furthermore, there has been a dramatic increase in inappropriate and tatty shopfronts and the Council struggles to keep the city free of litter. These are the things that as a resident I would like to see more focus on.

The most pressing need in the area is for social housing and low-cost housing for young people and families, yet the planned developments are for three- and four -bedroom houses which are unaffordable for many local-residents.

The Local Plan should have sustainability at its core, yet too many of the sites put forward are greenfield open spaces, which is I believe the easy option - preferred by developers for maximum profit. The excessive number of new houses proposed is based more on achieving the funding for new road infrastructure rather than proven housing needs. This will put intolerable stress on the internationally significant natural environment surrounding the city and the rare ecology of our chalk river and its green belt which runs through the city. The result will be increasing pollution (including sewage spills, emissions, light and noise pollution), loss of open spaces which act as buffer zones for nature reserves and SSSIs, all of which result in disturbance of wildlife and inevitable loss of biodiversity. Increased hard surfaces and loss of trees and hedges will result in further danger of flooding.

The district's water resources are already stressed through large consumption and terrible pollution due to large scale sewerage discharge and road run off. The huge scale of development proposed will mean that the remedial efforts for infrastructure set out in the draft Local Plan are unlikely to be sufficient. Canterbury does not have, and never will have the required infrastructure, to accommodate this scale of development. CCC has already had to halt present development projects due to the lack of efficient waste-water removal and the severe ecological damage being caused to Stodmarsh National Nature Reserve and the Stour River

catchment area. Infrastructure will inevitably be planned in a segmented way for individual developments without thought for more cohesive planning needed for an effective infrastructure across the whole district. Furthermore, social and economic resources will also be severely burdened. The loss of prime agricultural land is also of grave concern, when a sustainable future will require locally grown food as a national priority.

CCC argues national government policy compels it to achieve specified housing targets however I would call on Canterbury City Council to extend the period of the final drafting of the Local Plan in the light of the recent statements by Michael Gove, the Minister of State for Levelling Up, Housing and Communities. He said that instead of future housing numbers being imposed by central government in top-down style, "It will be up to local authorities, working with their communities, to determine how many homes can be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character of an area, or heritage assets". To reflect this change in policy he said he would be starting a formal consultation and proposing changes to the National Planning Policy Framework. These changes could allow for a fundamental revision down of the housing numbers proposed for the Canterbury District. In the light of this it would be sensible for CCC to limit the Allocations in the Local Plan to 806 dwelling per annum as recommended by their own consultants Edge Analytics in the Council's Housing Needs Assessment for the Plan period to 2045.

Policy SS4: Movement and Transportation Strategy for the District

I urge CCC to reject the concept of an Eastern Movement Corridor and the division of the city into 5 zones. These proposals will be damaging and are untested solutions.

There is little credible justification for the Eastern Movement Corridor. The proposal will break connectivity between Old Park and Chequers Wood SSSI and the Stodmarsh SSSI/Ramsar site, damage the Sturry Road Community Park, destroy priority habitats such as acid grassland, wet and ancient woodland, as well as a large area of Grade 1 and 2 agricultural land and contradicts the aims set out in policies SS1 (Environmental Strategy) and SS2 (the Sustainable Design Strategy for the District). It will also remove essential buffer greenfield land for the Old Park and Chequers Wood SSSI and require the building of many houses so that it can be paid for through developer contributions. It will do little to address the most pressing problems of city centre congestion, air quality and an integrated, flexible public transport responsive to public demand and designed to facilitate progressive modal shift. I would encourage CCC to consider seriously the sustainable and more realistic proposals put forward by CAST such as reduction of reliance upon private cars into and across the city, clean air/congestion zones, low emission zones and most pressingly improved and cheaper public transport options.

The proposals for city centre traffic sectorisation are not acceptable. Canterbury, a small medieval city built in a topographical bowl is not comparable with a large flat city like Ghent. Canterbury does not comprise of existing zones (e.g. shopping zones) and is far more centralised. This plan lacks detailed feasibility studies and will result in longer car journeys which entirely negates the council's own adoption of a policy for the 25% reduction car miles by 2030.

## Policy SS1 Environmental Strategy for the District:

While I very much support the Environmental Strategy for the district, (in particular the delivery of a minimum of 20% Biodiversity Net Gain) and am pleased to see that the Council will continue to work with partners to explore the promotion of a Stour Valley Regional Park, I urge the council to rethink its Draft Local Plan with regard to:

- The extensive loss of greenfield land – including agricultural land and buffer zones for Nature Reserves and SSSIs – due to the excessive housing numbers proposed. For example, the proposal to build houses on the current driving range of the Canterbury Golf Course will in effect remove greenfield which at present forms an essential buffer zone for the Old Park and Chequers Wood SSSI. This area contains one of the highest concentrations of breeding nightingales in the country, habitat for turtle doves, reptiles and the only inland population of the nationally rare clove-scented broomrape. This will inevitably result in huge loss of biodiversity and endangered species which no amount of mitigation proposals will be able prevent. There should be no building on Grade 1 or 11 agricultural land.
- The increasing stress upon water resources both for provision of domestic clean water, as well as the alarming increase in pollution of our water ways through sewerage and road run off.
- Any reference to commitments made in the 2018 Green Infrastructure Strategy seems to have been omitted in the Draft Local Plan. The Green Infrastructure Strategy brought together policies towards biodiversity, recreation and active travel, water resources, woodlands, landscape character and health and wellbeing.

Old Park and Chequers Wood: I fully support the campaign to protect the integrity of Old Park and Chequers Wood and to extend the SSSI to safeguard the area in its entirety. The positive proposals in Policy SS1 will be severely undermined by the proposal to build the Eastern Movement Corridor. The Eastern Movement Corridor will disrupt the connectivity between Old Park and Chequers Wood and Stodmarsh SSSI/Ramsar site Old Park and Chequers Wood plays a significant role in delivering the Biodiversity Net Gain policy of a minimum of 20% in policy SS1. In addition it plays a significant role in delivering a network of green and blue infrastructure. The Green Infrastructure Strategy highlights Old Park and Chequers Wood as being of ‘particularly significant strategic potential for open space and ecology in the District’ and makes the commitment to deliver a 5-year action plan to ‘work with partners to maximise the range of public and wildlife benefits of the area around Old Park’. The proposed Eastern Movement Corridor threatens the integrity of the SSSI, is contrary to Policy DS18 (Habitats and landscapes of National Importance) and will result in the loss of the critical buffer zone of green land for the SSSI.

I call on the Council

- to protect Old Park and Chequers Wood in its entirety
- to ensure that the SSSI is effectively buffered
- support an application to Natural England to extend the boundaries of the site to cover all the adjacent mosaic of priority habitats.

- The commitment in the Green Infrastructure Strategy (and in the draft Tree and Woodland Strategy) to protect and improve connectivity between woodlands around the city will be made impossible when the proposed Eastern Movement Corridor route cuts straight through the ancient woodland at Trenley Park. I call on the Council to improve connectivity between the SSSI and the Stour Valley wetlands of Fordwich, Westbere and the Stodmarsh Ramsar site. This would be in line with achieving landscape-scale nature recovery.

## CONCLUSION

I find the present draft of the Local Plan deeply flawed.

- The period for the drafting of the plan should be extended until the proposed changes to the NPPF have been clarified
- Planning policy for an historic cathedral town like Canterbury should be conservation driven – both conservation of heritage and ecological assets
- Locally assessed needs for housing should be at the heart of future housing numbers
- The proposed Eastern Movement Corridor and the division of the city into zones should be rejected
- Evidence based assessments for the Local Plan's impact on the natural environment and biodiversity, including its impact on Old Park and Chequers Wood should be provided
- The Council should support the protection of Old Park and Chequer's Wood in its entirety and support the proposal to extend the SSSI and maintain its buffer zones
- An Infrastructure Delivery plan should be provided
- The focus should be on the holistic needs of the local community with sustainability at its core

It would be helpful if in future CCC consulted on the Draft Local Plan through progressive community engagement, including public workshops on discrete sections (in the manner in which the Pollinator Action Plan and the Tree Strategy were conducted). This would result in effective team-work by all stakeholders. Simplification of the process of public communication is needed as the navigation of the consultation document is too complex and lengthy.

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