



CCC Consultations <consultations@canterbury.gov.uk>

Fwd: Public consultation comments regarding the draft Canterbury Local Plan

1 message

Ben Fitter-Harding [REDACTED]
To: CCC Consultations <consultations@canterbury.gov.uk>

17 January 2023 at 08:35

More!

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From: **Tracey Dessoy** [REDACTED]
Date: Mon, 16 Jan 2023 at 23:59
Subject: Public consultation comments regarding the draft Canterbury Local Plan
[REDACTED]

Dear Louise,

As a resident of Little Stour and Adisham ward and a long-term supporter of the Conservative party, I am disappointed to find myself in the position of being unable to vote Conservative in the forthcoming local elections. This is due to serious concerns regarding the council's expressed intention to place Canterbury at the centre of extensive urban development in the district, rather than focusing more appropriately on the protection and enhancement of the city's unique and significant heritage.

Please find below my comments (submitted in the context of the **consultation process**) on particular areas I have identified as key causes for concern regarding the Local Plan:

1. Policy SS3 – Development strategy for the district

- a) **Housing numbers:** The vast developments proposed are excessive, damaging and unnecessary, and will hopefully have to be revised in the light of Michael Gove's statement on 6 December (<https://questions-statements.parliament.uk/written-statements/detail/2022-12-06/hcws415>), the government's announcement on 22 December (<https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>) and the expectation that, following the government's consultation on the NPPF until 2 March and the specific details to be confirmed in the spring, local planning process will have to be greatly modified accordingly.
- b) **The plan to make Canterbury the principal focus for development in the district:** the imposition of such an urban vision on a city that has enjoyed unique historical and spiritual significance over the centuries would inevitably have an adverse effect on its heritage assets. The huge areas proposed for development in the resulting urban sprawl of the city would sadly undermine the character and history of the ancient villages currently earmarked as 'rural service centres' and 'local service centres'.
- c) **The proposal of zones** detailed in the Transport Topic Paper is outrageous and irrelevant: Canterbury is nothing like Ghent geographically, culturally or in terms of size.

2. Policies C11-C15: East Canterbury

- a) **For C11-C14, please see 1a) and 1b) above.**

- b) **C15 and C16: Proposed development at Canterbury Golf Course/ Canterbury Eastern Movement Corridor:** The size of the proposed development at Canterbury Golf Course is likely to have an adverse effect on the adjoining Old Park and Chequers Wood SSSI both during the construction process and subsequently; this ancient woodland habitat would also need to be appropriately buffered from any new bypass development. I would also request that the Council 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.
- c) **Archaeological impact:** The currently proposed route could jeopardise significant archaeological excavations that are currently taking place in the SSSI; it would also coincide, at the junction of the Lampen stream and the A257, with two monuments identified on the HER: TR 15 NE 1932 Possible location of the Manor of Moat, and TR 15 NE 1934 Possible route of medieval Organ Lane (please see comments on Policy DS26: Historic Environment and Archaeology below).

3. Policy R2: Rural Service Centres:

- a) **Policies R14-R16: Littlebourne:** Further development in this ancient village (which features, of course, in Domesday Book) and the surrounding countryside would not only destroy its character but would overwhelm the road network around it; moreover, it would lead to loss of prime agricultural land and change the character of the local community. Canterbury City Council's own Local Plan Landscape Character and Biodiversity Appraisal (2012) indicates that the proposed building site to the south of The Hill is a "gently rolling landform with deep loamy soils; Grade 1 land farmed traditionally as orchards and hops but giving way to arable; Strong field pattern created by windbreaks and crops" (Jacobs: Canterbury Landscape Character and Biodiversity Appraisal, draft, August 2012. 43: South Canterbury and Littlebourne Fruit Belt, p. 161. Available at: <http://conservebridge.org.uk/wp-content/uploads/2017/02/CDLP-91-CanterburyLandscapeCharacterBiodiversityAppraisalDraft-Jacobs-August2012.pdf>). This document also considers the importance of the history of the village and its surroundings (p. 162). Additionally, Grade 1 arable land will inevitably be in greater demand in the near future in terms of increasing local production of foods and minimising transport needs, both to enable the UK to play its part in addressing the climate crisis and to address problems regarding significant delays to food imports from Europe and the shortage of HGV drivers (cf. preface to report by the National Farmers' Union entitled "The Future of Food 2040": Dr Andrea Graham, NFU Head of Policy Services (2019). Available at: <https://www.nfuonline.com/nfu-online/news/the-future-of-food-2040/>).

4. Chapter 6: District-wide Strategic Policies:

- a) **Policies DS18 and DS19:** Please see my comments under 2b) and 2c) above regarding potential threats to the Old Park and Chequers Wood SSSI; further, I would request a new Local Landscape Designation (LLD) for the mosaic habitat of this wood, so that development will only be permitted where it conserves or enhances the special qualities of the landscape. I would also request that the wood be safeguarded for Biodiversity Net Gain through the Local Nature Recovery Strategy.
- b) **Policy DS21: Supporting biodiversity recovery:** I agree in principle with the clause supporting the need to avoid the fragmentation of habitats, and recognising the need to create and extend ecological networks and green corridors, and would like to see this applied specifically in relation to Old Park and Chequers Wood SSSI; I would also like to see this wood designated as 'a strategically important Biodiversity Opportunity Area' and promoted in terms of nature conservation and outdoor education. With regard to the clause concerning the protection and enhancement of habitats for protected species, I would wish to see this applied to Old Park and Chequers Wood for reasons given under 3a) above. While in principle the proposals for all development to be required to deliver a minimum of 20% biodiversity net gain might sound impressive, quite clearly this newly created biodiversity can in no way replace the long-established biodiversity destroyed in the process of building the urban sprawl.
- c) **Policy DS22: Landscape Character:** I support this policy in its entirety as it emphasises that development proposals that cause significant harm to the landscape value of an area will be refused. The

effects will, however, necessarily be determined by how that language is interpreted in reality. The concept itself is notably relevant to Old Park and Chequers Wood, but also to many other areas at potential risk.

d) **Policy DS26: Historic Environment & Archaeology:** This policy also sounds good in principle, yet there are worrying clauses relating to potential harm to heritage assets versus public benefit, and the loss of cathedral views through the proposed building of the Merton Park development would be unacceptable. I would like to see greater recognition of the archaeological sites in Old Park and Chequers Wood as 'Archaeological Heritage Assets' in view of their international significance. I am also particularly concerned about the impact that the proposed Eastern Movement Corridor would have on the HER monuments indicated in 2c) above: TR 15 NE 1932: Possible location of the Manor of Moat, a moated stone house apparently built by Geoffrey Lowther c.1430, situated close to where the Canterbury/Sandwich road crosses the Lampen stream, and TR 15 NE 1934: Possible route of the medieval Organ Lane, a footpath/trackway between grid reference 618387, 158905 at its junction with Stodmarsh Road, and a point 618670, 157931 close to where the Littlebourne Road crosses the Lampen stream. Organ Lane was noted by the historian C.E. Woodruff to have been a continuation of 'the ancient track-way to the ford', formerly known as the 'old way leading through the King's Park' (*A History of the Town and Port of Fordwich*, Canterbury: Cross and Jackman, 1895, pp. 116-117): this ancient trackway in Fordwich, now known as Well Lane, is also under threat from the proposed route of the Eastern Movement Corridor. Well Lane is referenced in the HER monument record for Organ Lane noted above.

As indicated above, these are some of my main concerns regarding the content of this vast document insofar as it impacts upon the Little Stour and Adisham Ward; I look forward to seeing the changes that might occur following the outcome of the government's consultation on the NPPF.

Kind regards

Tracey Haynes

