



CCC Consultations <consultations@canterbury.gov.uk>

Fwd: Public consultation objections regarding Canterbury City Council's draft Local Plan to 2045

1 message

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

17 January 2023 at 08:41

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From: **Miranda Haynes** [REDACTED]
Date: Tue, 17 Jan 2023 at 00:05
Subject: Public consultation objections regarding Canterbury City Council's draft Local Plan to 2045
[REDACTED]

Dear Louise,

I am writing to you as the local councillor for my ward – Little Stour and Adisham – to express my principal concerns regarding the Canterbury draft Development Plan. Please see below.

1. I note with considerable concern the fact that the **council proposes to approve more than twice the number of houses needed even under the recent government requirements**, which will, it seems, be modified significantly in the near future, as indicated by Michael Gove's statement on 6 December 2022 and the government's announcement on 22 December 2022. The housing numbers proposed in the Development Plan would have unsustainable impact on infrastructures, biodiversity and local amenities. It is also not clear how developers would be forced to provide the required number of affordable homes once permission to develop has been granted: they are not renowned for fulfilling obligations. Before building new homes, there should first be a focus on filling the existing empty homes around Canterbury (which, according to 2021/22 data, accounted for 60% of total empty homes in Kent). Not to mention many properties in Canterbury and the surrounding areas are held by investors as student homes or holiday lets, reducing the number of houses available to buy or rent on the market. Canterbury has seen a huge increase in the availability of student flats and accommodation in recent years, so I would hope that this at least would free up some existing properties that would suit first-time buyers. As a prospective first-time buyer, I am horrified by the thought of living on a development complex whose building has led to the destruction of and/or damage to existing and established local environment. Large-scale development projects that have taken place around Canterbury so far (such as Howe Barracks) have not conformed to the standards of 'high quality' and are not 'sensitive to the unique character of our district' as set out in the plan. The same can be said for the new Riverside (or 'erside', as the fluorescent sign proudly proclaimed a matter of weeks after installation – a testament to the high quality of materials and building standards, I'm sure) development.
2. A further area of particular concern is the **council's plan to make Canterbury the principal focus for development in the district, rather than focusing on preserving and enhancing its unique and extensive heritage** – including the prestigious World Heritage Site and its environs: the imposition of such an urban vision on

a city that has enjoyed unique historical and spiritual significance over the centuries will inevitably have an adverse effect on its heritage assets.

3. The **proposed development in east Canterbury, including the proposed Eastern Movement Corridor** raises several issues, including the **threat to the SSSI adjoining the Canterbury golf course** and the need to buffer this ancient and significant archaeological site and woodland habitat from any new bypass development. Because of its importance, **this site should be both protected and extended** (by application to Natural England and the securing of a new Local Landscape Designation respectively) to encompass neighbouring ancient natural environments and ensure that development will only be permitted where it conserves or enhances the special qualities of the landscape. The proposed route of the Eastern Movement Corridor would coincide at the junction with the Littlebourne Road with **two medieval monuments identified on the Historic Environment Record**: HER TR 15 NE 1932 Possible location of the Manor of Moat, and TR 15 NE 1934 Possible route of medieval Organ Lane. The first of these represents a documented fifteenth-century moated manor, and the second a documented trackway, in use in the medieval period, that crossed the Moat estate from the Lampen stream to the Stodmarsh Road, and continued down the ancient trackway (now known as **Well Lane** – also endangered by the proposals) to the ford in Fordwich. The **historical integrity of the ancient village of Littlebourne – documented in Domesday Book – would also be undermined**.

4. During public consultation in August 2021, the Gladman proposal for the building of 115 houses in Littlebourne was roundly **rejected by local residents** and by official environmental and traffic agencies due to its inappropriateness for the location, particularly in relation to already congested roads including The Hill and Bekesbourne Lane, the lack of capacity in the existing village infrastructure, and **the loss of the village character and sense of community within its rural setting**. Where the plan promises to '[s]upport the sustainable growth of our rural communities ... while taking advantage of opportunities to grow the rural economy', I fail to see how building on areas designated as prime agricultural land (as is the case in Littlebourne) helps to 'grow the rural economy'. Surely the rural economy is in agriculture, and so more needs to be done to protect this land and retain its use for farming (particularly as we move towards sustainably and locally sourced produce to combat the climate crisis).

With regard to wastewater management and runoff, it has been indicated that Nutrient Mitigation Schemes will be appropriate where on-site sewage treatment is a possibility, but where would such wetlands be located without risking additional damage to already over-stressed natural systems, and how would this contribute to the 'full recovery of the Stodmarsh Nature Reserve designated site and ... meet its targets for water quality and improve biodiversity'? **How are newly created wetlands and woodlands going to provide immediate pollution reduction to local waterways** (a key concern being 'the poor condition of the Stodmarsh protected site')? How will sewage and excess nutrients be dealt with until the new wetlands are fully developed (which I'm assuming will take many years)? If tankered, where will the sewage be deposited, given that Southern Water is notorious for its irresponsible disposal of waste? **Are these wetlands and woodlands going to be monitored and protected in the same way as nature reserves are, to ensure they are functioning adequately and biodiversity is protected?**

5. Whilst, in principle, I support aspects of the policy supporting biodiversity recovery (DS21), I would like to see a greater commitment to the Old Park and Chequers Wood SSSI in this respect. I am certainly in favour of the Landscape Character policy (DS22) with its assurance that development proposals that cause significant harm to the landscape value of an area will be refused.

Many thanks for your time in considering these points.

Best wishes,

Miranda Haynes



