

Draft Canterbury District Local Plan - Response from J. Holland

Policy SS1: Environmental Strategy for the district

I am strongly in favour of policy SS1 but do have some suggested **changes/ additions**:

The green Infrastructure priorities, opportunities and objectives identified in the **Canterbury District Green Infrastructure Strategy 2018-31** and the excellent '**evidence report**' linked to that report should be used to provide guidelines for the network of green infrastructure in the Canterbury district that should be protected, maintained and enhanced, alongside the Local Landscape Designations Review (2020). (**SS1 point 2**) referred to in the introduction to **policy DS19 (Habitats, landscapes and sites of local importance)**

Measures for new developments across the district to deliver a minimum 20% biodiversity net gain (**SS1 Point 4**) should be guided by the **ten good practice principles** (CIEEM 2016) i.e. not claim to be delivering something that would be occurring anyway.

An additional contribution to flood plain management could be made (**SS1 point 5**) by improvements to existing infrastructure such as Victorian drainage structures that cannot deal with heavy rainfall, now more likely to occur as a result of global warming, causing flooding in parts of Canterbury e.g. St Stephens Road. Could storm water storage tanks be used to collect water for irrigation or transfer to the new Broad Oak reservoir?

Agreements by developers to provide a minimum of 20% tree cover (**SS1 point 5**) should be accompanied by a commitment to their ongoing maintenance and enhancement by means of connectivity. CCC should also monitor activities undertaken in an ongoing way to ensure that commitments are both delivered and sustained in the longer term.

A new Stour Valley Regional Park would be an excellent amenity (**SS1 point 7**) that could provide an opportunity for partnership working between transport providers and other agencies in order to improve access for visitors to remoter areas of countryside that are currently only easily accessible by car. New places for buses to stop on existing routes (i.e. Clowes Wood) could be identified and agreed as well as new routes that could provide access to areas of high value landscape that are difficult to reach by public transport (i.e. Chartham Hatch, Stodmarsh, Trenley Park Wood).

A new Stour Valley Regional Park could play an important role in improving connectivity for wildlife along the Stour Valley corridor, including between the Old Park and Chequers Wood and Stodmarsh SSSIs as part of the Lower Stour Wetlands Biodiversity Opportunity area. (**Canterbury District Green Infrastructure Strategy 2018-31**)

Policy SS2: Sustainable Design Strategy for the district

I agree with objectives identified in this policy, in particular that 'new developments should be designed to achieve Net Zero operational carbon emissions and should be designed to maximise energy and water efficiency.' Opportunities should be explored for making use of alternative sources of renewable energy such as solar and wind power and heat pumps.

I think that it is important also that this policy refers to protection of the World Heritage Site assets. **(SS2 point 1)** Consideration should be given to the World Heritage site setting to avoid the cumulative impact of allowing mediocre new buildings and developments to detract from the quality of World Heritage site surroundings. Improvements to accessibility and connectivity of the World Heritage site should include enhancement of routes that provide access to the site including those that have historic significance. (i.e. The Pilgrim's Way which seems to disappear at the ring-road on the outskirts of the city)

Policy SS3: Development Strategy for the district

I strongly disagree with policy SS3, especially the proposed target of an average of 1,252 new dwellings per year **(SS3 point 1)** , with the principal focus for development in the Canterbury area. This would amount to approximately 29,325 dwellings over the plan period as opposed to 11,440 over the previous 20 years which would in effect double the size of Canterbury compared to how it is at the moment. These targets seem to conflict with CCC's zero carbon policy commitments and fail to take account of carbon expenditure on building materials and loss of green space that would result. In addition, this large scale development would detract from the character of Canterbury as a small cathedral city in a rural setting. The need to protect and enhance Canterbury City's World Heritage status and assets (see policy SS2) provides a strong reason for restricting the scale of future development to less than that outlined in this policy.

Proposed changes to the National Planning Policy Framework mentioned by the Secretary of State for Levelling Up, Housing and Communities in December 2022 would mean that in the future, local authorities, working with their communities could determine how many homes should be built, taking into account what needs to be protected in each area and whether proposed levels of development required by Government 'standard methodology' would result in a significant loss or alteration of character. It would make sense for CCC to extend the period for final drafting of the Canterbury District Local Plan to ensure that it takes account of the proposed revisions of the NPPF when these have been clarified.

An extension of the time taken to draft the plan would also provide an opportunity to review housing mix (Policy SS3 **point 1a**) which currently has a focus on building three and four bedroom houses. CCC could look at whether there would be an opportunity to develop their own social housing stock to meet local need which could then be mentioned as a priority in the plan.

Policy SS4: Movement and Transportation Strategy for the district

I tend to disagree with policy SS4 but am in favour of its goals. I strongly agree with the stated principles of the Circulation Plan (**Transport Topic Paper 2022**) to improve the quality of life for residents and visitors to the urban centre and neighbourhoods, guarantee accessibility for pedestrians, cyclists, buses and others to the city centre and remove unnecessary vehicle journeys but I have reservations about the way in which this would be achieved as a result of the proposed plan (**Policy SS4 point 2**) and believe that this should be looked at again to see if the principles of sustainable travel could be delivered in a different way.

The proposal for a sectoring system that would divide the city into five zones is extremely unpopular with local residents, especially those who for reasons such as age or disability are dependent on the

use of a car. The sectoring system is anticipated by residents to produce an increase in road traffic, travel times and air pollution in the outer parts of the city. The use of public transport as an alternative presents constraints and difficulties for many and substantial improvements would need to be made to infrastructure, information availability, frequency, reliability, cost, safety and accessibility for everyone before people could be persuaded to use public transport and leave their cars at home.

I am very much in favour of points **a-f** of policy **SS4** which have an emphasis on enabling a much needed increase in active travel journeys, which support the **movement hierarchy** shown in **policy DS13**. The delivery of *'enhanced road connectivity'* (**Policy SS4 point g**) appears to contradict the rationale of this hierarchy especially the proposed construction of a new eastern movement corridor to connect the A28 at Sturry with the A2 at Bridge. The introduction to policy DS13 (**Movement hierarchy**) states that it is critical that all new developments follow the movement hierarchy to *'embed this prioritisation within the design and delivery of schemes'*. Use of private vehicles is located at the bottom of the hierarchy, yet the Transport Topic Paper (October 2022) describes a new scheme for the construction of an outer ring road in order to *'re-provide highway capacity and access'* which goes against the prioritisation described. Research has demonstrated that new roads in themselves create and attract traffic. The carbon cost of the construction and increase in road traffic encouraged would have a detrimental impact on the stated objectives of CCC's movement and transportation strategy and the Council's pledge to cut emissions and achieve net zero by 2030 as indicated in the CCC Climate Change Action Plan 2020-2030.

The proposed eastern movement corridor is also likely to have a negative impact on biodiversity, since it would detract from Green Infrastructure opportunities described in the city's Green Infrastructure Strategy (2019) where Chequers Park and Old Park SSSI is identified as an important area for nature conservation improvement to provide connectivity from the city centre to the Stour Valley wetlands. This would also conflict with priorities described in policy **DS18 (Habitats and landscapes of national importance)** to maintain the nature conservation interests of SSSIs. I am in favour of the 'Common Position on The Old Park and Chequers Wood SSI' (December 2022) signed by 11 different conservation organisations which points out the need to strengthen connectivity along the Stour Valley.

A northern movement corridor mentioned in **Policy C26 (Land north of University of Kent)** could be equally damaging, although no details about the proposed route are yet available. CCC's Green Infrastructure Strategy describes priority woodland habitat at the University of Kent as part of a main biodiversity corridor to the city which should be protected.

The upgrade of Rough Common Road to provide a western link for the proposed outer ring road would be detrimental for the Rough Common community bringing a substantial increase in traffic and pollution to that area. Jacobs (transport consultants) traffic modelling reports indicate a significant increase in traffic flow on Whitstable Road and Tyler Hill Road as a result of the Rough Common Road upgrade, with potential for considerable congestion occurring in those areas and no suggested mitigation schemes mentioned. The proposed western link would have a negative impact on the quality life for residents of the neighbourhoods affected which is contrary to the stated principles of the Circulation Plan.

These fundamental drawbacks to the proposed sectoring system and construction of an outer ring road as part of the Canterbury Circulation Plan suggest that alternative strategies to achieve

modal shift in the Canterbury City area are needed. Many of these are described in points **a-f** of **policy SS4** as key transport infrastructure requirements of the **Canterbury Circulation plan**. A faster and more reliable public transport service accompanied by congestion charging, implemented initially at peak traffic times could help reduce the need to travel by car as part of a series of measures and schemes developed in the immediate and medium term that would not need to rely on damaging road building works for their implementation.

Policy SS5: Infrastructure Strategy for the district

A draft Infrastructure Delivery Plan (2022) is referred to as Part of policy SS5. The Delivery Plan in CCC's evidence folder includes 'Schedule A – Sustainable Transport and Highways' as an appendix. Reference A15 in the delivery plan referring to Active Travel Infrastructure describes 'a package of measures to improve walking and cycling infrastructure' taken from the Draft Local Cycling and Walking implementation plan. Considering the importance of increasing use of public transport apparent in the movement hierarchy (**Policy DS13**) there is potential to have a much greater emphasis on a package of measures to improve **public transport infrastructure** needed to address improvements in information availability, safety, accessibility, frequency, reliability and better bus stop facilities to maximise the convenience and attractiveness of public transport use and help encourage its uptake as an important aspect of active travel. These are not yet identified in the Infrastructure Delivery Plan

It is fortunate that the Delivery Plan says that 'The council will undertake further evidence gathering and consultation with infrastructure providers and stakeholders to confirm requirements'. I believe that perceived improvements needed for public transport infrastructure should be investigated as a priority.

Policy C15: Canterbury Golf Course

I strongly disagree with policy **C15** as I believe that the Canterbury Golf Course site, which is adjacent to the Old Park and Chequers Wood SSSI is not suitable for the large housing development proposed. I mentioned in connection with policy SS4 (Movement and Transportation Strategy) that I am in favour of the 'Common Position on The Old Park and Chequers Wood SSI' (December 2022) which identifies the importance of protecting the integrity of the SSSI and a suggested new buffer zone. The proposed golf course development would cause disturbance from construction and habitat loss in the short to medium term in this location, leading in the longer term to urbanisation and disturbance of the SSSI habitat and buffer zone as a consequence of an increase in human activity.

Policy C16: Canterbury Eastern Movement Corridor

I strongly disagree with policy C16 which promotes '*enhanced road connectivity*' (**Policy SS4 point g**) via the proposed construction of a new eastern movement corridor to connect the A28 at Sturry with the A2 at Bridge. This proposal would be likely to have a negative impact on biodiversity, since it would detract from Green Infrastructure opportunities described in the city's Green Infrastructure Strategy (2019) where Chequers Park and Old Park SSSI is identified as an important area for nature conservation improvement to provide connectivity from the city centre to the Stour Valley wetlands. The 'Common Position on The Old Park and Chequers Wood SSI' (December 2022) emphasises the need to protect the SSSI from any form of development whether primary development such as a

bypass or housing or secondary development that would result from the relocation of ancillary golf club facilities.

Policy C26 Land north of the University of Kent

I tend to disagree with policy C26 which contains a reference to the future exploration of opportunities to facilitate a northern movement corridor to complete the outer ring of the Canterbury Circulation Plan. No further information about this is provided, which suggests that a strategy for the whole north Canterbury area is needed with a focus on protection of ancient and priority habitat woodland on the University of Kent site. Suggestions about the proposed development of a garden community to the north of the campus are not given a location or suggested time frame for development which makes it difficult to make an informed decision about the plans that are mentioned.

The University of Kent land provides important and valued open spaces for the local community to use for recreation. Consultation with the local community around development of the Canterbury Campus Framework Masterplan in 2018-19 led to a commitment by the University of Kent not to build on the southern University slopes. This commitment, however is not mentioned in CCC's Open Space Strategy, which is an omission that I believe should be rectified.

Policy DS13: Movement Hierarchy and Policy DS14: Active and Sustainable travel

I strongly agree with the content of both these policies although it does appear, as mentioned in relation to **Policy SS4: Movement and Transportation Strategy for the district** that the proposed Canterbury Circulation Plan fails to support the prioritisation of the Movement Hierarchy described

Jennifer Holland - 22.01.23

