



CCC Consultations <consultations@canterbury.gov.uk>

Objections to the Eastern By-Pass

1 message

Frazer Thompson [REDACTED]

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To: "consultations@canterbury.gov.uk" <consultations@canterbury.gov.uk>

Dear Sir/Madam,

Further to the call from Fordwich Town Council for views on the Eastern By-Pass, I would like to add my observations to those of the Council. These are summary views only, but supported by the evidence I have available to me.

1. I believe that there is a flawed Approach to Objectively Assessed Need (OAN):

- The Draft Local Plan appears to be driven by the misconception that OAN must be met at all costs, ignoring negative effects.
- Changes to National Planning Policy Framework 2021 (NPPF) make it easier for authorities to **not** meet OAN. However, CCC has not considered this alternative. CCC's failure to consider not meeting OAN means the Draft Local Plan is not sound and Policy SS3 cannot be justified.
- The Levelling Up and Regeneration Bill reinforces the need to consider alternatives to OAN.
- The Draft Local Plan's approach to habitats of international importance is flawed, with "generic" mitigation measures at screening stage being in error.

2. There is no real evidence and therefore a fundamentally flawed Basis for Transportation Strategy:

- CCC's transportation strategy is not supported by evidence and is not effective, leading to increased pollution and traffic congestion.
- CCC's own modelling report showed that the Ghent-like Zoning Scheme would increase journey times by car.

3. Specific Objections to Eastern Bypass Route:

- The proposed location of the Eastern Bypass Route is not supported by evidence and not based on a lawful assessment.
- The preferred Eastern Bypass Route was simply a line drawn by Ruth Goudie with no evidence or justification.
- The Eastern Bypass Route is the worst in environmental, heritage, archaeology, viability, flooding, agricultural, and landscape terms.
- Archaeology: The high ground south of Fordwich contains important Palaeolithic archaeology, and the damage caused by the Eastern Bypass Route cannot be mitigated.
- Heritage: Fordwich is a Conservation Area of special architectural and historical interest, and the Eastern Bypass Route would harm its justification and be inconsistent with national policy and CCC's duty.
- Environment/Ecology: The Eastern Bypass Route will have significant adverse effects on the environment and ecology that were discounted at the outset. In addition, the Eastern

Bypass Route would sever ecological connectivity between Chequer's Wood and Old Park SSSI and Stodmarsh National Nature Reserve.

4. In Summary I believe that:-

- Canterbury City Council (CCC) has failed to properly assess alternatives for the Eastern Movement Corridor (Eastern Bypass Route), not weighing the benefits and harms of each alternative.
- The Western Route alternative was discounted without proper consideration of its impact on the Chequer's Wood and Old Park Site of Special Scientific Interest (SSSI).
- The Draft Local Plan and associated policies are legally flawed and not sound, failing to comply with common law requirements and Strategic Environmental Assessment Regulations and Habitats Regulations.
- The area west of Fordwich should be designated a strategic gap protective policy and steps taken to restrict traffic, particularly heavy goods vehicles.

I believe the best route forward would be to start again, as the current process and ideas are badly flawed. Like most residents of this beautiful gem of a town, I do recognise the need to have a plan. I simply think this one is so fundamentally wrong, it could destroy this jewel forever.

Yours faithfully

Frazer Thompson

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