

Heritage and environment section submitted by Simon Pettman on behalf of SSRA

### **NE1. How can we protect and enhance our heritage assets?**

Option NE1A (preferred option) - continue with the current Local Plan approach

Option NE1B - make changes to the current Local Plan policies ✓

Tell us why: The current policies for the world heritage site, buffer zones and heritage assets needs updating in the light of the many lessons learnt from the pandemic. Canterbury cannot afford to be complacent about the risk of losing its UNESCO World Heritage Site status. Enforcement needs to be much stronger than it is currently the case.

### **NE2. How can we support the adaptation of the historic environment to achieve improvements in carbon emissions and energy efficiency?**

How should we do this?

Option NE2A continue with the current approach which gives general design policies

Option NE2B - (preferred option) - support the adaptation and retrofitting of buildings in conservation areas and historic buildings through new guidance ✓

### **NE3. How should we protect and enhance biodiversity and green and blue spaces like parks and river**

Option NE3A: continue with the current Local Plan approach of new developments providing and extending green infrastructure (including trees) where they can, and set a 10% biodiversity net gain requirement

Option NE3B - require new developments to enhance existing, or provide new, green spaces to conserve and where possible enhance blue spaces, plus a 10% biodiversity net gain

Option NE3C (preferred option) - require new developments to enhance existing, or provide new, green spaces to conserve and where possible enhance blue spaces, plus a 20% biodiversity net gain ✓

Tell us why: We support the 20% biodiversity net gain target since the district should be aiming to implement best practice where net gain is concerned and not the legal minimum.

### **NE4. How should we make sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscapes?**

Protecting and enhancing the character of our valued landscapes NE4 (Stour Valley)

Option NE4L - think about a new Stour Valley Floodplain (east) LLD ✓

Option NE4M - (preferred option) - continue with the current approach to the Stour Valley landscape

Tell us why: As only one of 215 chalk streams in the world, the river Stour is of global ecological importance. The ecology of the Stour is being seriously compromised by sewage, agricultural run-off, over-extraction and development. Given the increasing frequency of extreme weather events, notably flooding, absolute priority must be given to protecting and re-naturalising the Stour Valley floodplain. No development at all should be permitted on areas of flood risk (such as Wincheap Water Meadows). In addition, serious consideration should be given to the designation of a Stour Valley Regional Park as proposed by the Kentish Stour Countryside Partnership (KSCP).

#### **NE4. How should we make sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscapes?**

Option NE4N - keep the area with some boundary changes as a new designation - 'landscape context of the historic city of Canterbury'

Option NE4O - (preferred option) - delete the boundary and replace with a criteria based approach setting out considerations like views, landscape character, and historic setting for development which might impact on the landscape surrounding Canterbury city

Do you think there's a better option?

Yes ✓

No

Tell us why: We disagree with both of the above options. We oppose the amendment or removal of the existing Canterbury Area of High Landscape Value designation. A contiguous landscape designation is better than a mosaic of individual components.

#### **NE5. How should we make sure our approach to green gaps is still effective**

Option NE5A - keep the current approach to development acceptable in green gaps ✓

Option NE5B (preferred option) - broaden the types of development that might be acceptable in these areas to encourage community facilities, including open space and recreation

Tell us why? Option NE5B would permit "development creep" into existing green gaps.

#### **Protecting and enhancing the character of our valued landscapes NE5 (Canterbury and Tyler Hill green gap)**

Option NE5K - change the boundary of the existing green gap ✓

Option NE5L - (preferred option) - keep the existing green gap identified in the current Local Plan

**Tell us why you chose this option:** The green gap between Canterbury and Tyler Hill needs to be increased to the East of Tyler Hill Road.

## **Protecting and enhancing the character of our valued landscapes NE5 (new green gaps)**

Option NE5S - think about opportunities to identify new green gaps ✓

Option NE5T (preferred option) - don't designate new green gaps

## **Protection and enhancement of wildlife and biodiversity (NE6)**

### **NE6. How should we manage outdoor lighting to support tranquility?**

Option NE6A - continue with the current Local Plan approach of using a design criteria when assessing outdoor lighting proposals

Option NE6B - preferred option) - include clear requirements for development proposals to conserve or enhance the tranquility provided by dark skies ✓

## **Provision of open space, recreation and leisure facilities (NE7)**

### **NE7. How should we protect existing open space in the Local Plan?**

Option NE7A - continue with the existing approach

Option NE7B (preferred option) - identify and protect open spaces in the Local Plan, providing clear criteria to be met if open space is proposed to be lost ✓

**Tell us why you chose this option:** We support the preferred option but consider that it is vital that local communities play a key role in determining if open spaces are “no longer needed”. At present, it is only the Council who makes this determination which is unacceptable.

## **NE8. How can we support accessible outdoor sports and recreation across the district?**

Option NE8A - keep the current approach

Option NE8B - (preferred option) - consider prioritising sport facilities where there is an identified lack of them ✓

## **Protection and enhancement of wildlife and biodiversity (NE9)**

## **NE9. How should we make sure our approach to local green spaces is still effective?**

Option NE9A - consider removing the existing local green space

Option NE9B - (preferred option) - keep the local green spaces identified in the current

Local Plan ✓

**Tell us why you chose this option:** As part of the local plan process the current local green spaces should be retained and local communities should be asked to nominate additional local green spaces.

Option NE11A - keep the current approach to require enough drainage and encourage major developments to design SuDS that include other benefits

Option NE11B - (preferred option) - encourage all developments to contain SuDS, and also keep the requirement to have enough drainage. Encourage SuDS to be designed to

include other benefits and provide information and guidance on the design of them ✓

## **Water environment and how it connects with our communities (NE12)**

### **NE12. What should we do about groundwater protections?**

How should we do this?

Option NE12A - keep the existing approach of having groundwater protection zones

Option NE12B - (preferred option) - set clear requirements for development proposals in groundwater protection zones, nitrate vulnerable zones and drinking water safeguard

zones ✓