

Draft Local Plan

Once more, the draft Local Plan fails to address the fundamental problem of how to meet the government housing target figures.

The draft continues to propose tacking on housing estates to the existing urban areas. These are on land put forward by developers who are effectively planning the future of our population distribution. These sites are ill coordinated and promoted by competing developers. There is no masterplan and consequently these sites lack continuity with little or no opportunity for sustainable community development. Lip service is paid to 'garden city principles' but this is unachievable by allowing scattered competing housing estates.

Good public transport, on which this plan relies, cannot be achieved unless enough people use it. This requires the creation of a correctly planned new town with a critical mass of at least 10,000 dwellings with a central community hub providing a full government funding of local facilities. A properly planned 15 minute city. This will ensure people do not need to travel by car. Public transport for those who do will only be viable if there are sufficient numbers to use it and to ensure a frequent service. Recent cuts to the Triangle Service underscore the problem. Temporary subsidy via s106 agreements is not a viable long term solution.

There is continued emphasis (Policy SS3) on development being concentrated around Canterbury. Yet Canterbury has the biggest traffic congestion and pollution problem. There is no adequate solution to this. The historic city is our biggest single economic asset for our largest single industry – tourism and local visitors. It is fundamental to the relative popularity of our universities. The city is essentially small and intimate protecting our 2 World Heritage sites. If these are compromised by more congestion and endless suburbia we will lose our USP.

In January there was new government guidance when the Minister confirmed that the standard method of assessing housing numbers was a starting point for councils, and not a mandatory target. He advocated councils putting forward their own ideas and where exceptional circumstances exist they should put forward alternatives 'for the good of the communities they serve.' Canterbury is surely a classic case.

Furthermore, it is acknowledged that more development will bring enhanced economic prosperity. Thus it is logical to concentrate that development on the areas with the greatest need. In the council's area this is clearly Herne Bay, not Canterbury.

Building a 'new town' or 'garden city', properly masterplanned by qualified town planners and drawing on our existing transport infrastructure (the A2, Thanet Way and rail links) is the way forward. This will require hard work and hard thinking which has just not been done. It will also attract central government funding for infrastructure improvement. Consider the 2017 Local Plan for 16,000 dwellings which attracted no government funding. Yet Ebbsfleet, which already has excellent transport infrastructure (M2, M25, HS1) obtained £530 million for infrastructure improvement for 15,000 dwellings. 1,000 less than Canterbury! Just because of the properly planned new town approach.

Turning to the specific policies of the new draft plan:

SS1 This is laudable motherhood and apple pie stuff but unachievable with the developer led approach and its inherent contradictions as outlined above.

SS2 2&3 This will not be achieved with competing developers on adjacent or near adjacent sites. The Thanington developments in the 2017 Local Plan plus the proposals in this plan are an excellent example of this failure.

SS2 4 With the combined 2017 LP for 1150 dwellings and sites C7, C9 and C10 for 930 dwellings Thanington will treble in terms of housing numbers and population. There are no plans for a new community hub. Health care facilities were promised but the NHS have vetoed the idea and continue to favour centralised larger surgeries in the city centre. This policy is unachievable.

SS2 6 Again, in Thanington, there will be random, patchy unplanned provision.

SS2 7 There has been no masterplanning for what will be over 2000 dwellings in Thanington split between at least 6 competing developers. This has, in turn, led to poor decisions on infrastructure planning and the direction of S106 monies.

SS3 2 As noted above, Canterbury should not be the primary focus for development.

SS4 2 This is laudable but a bus led strategy cannot work if it is commercially unsustainable. It may work initially with S106 support but it is not a long term solution unless a genuine new town approach is adopted as outlined above. Only this will provide the necessary critical mass of population to support a viable regular and thus popular service. City centre and connected cycle lanes need to be masterplanned first as they may not be achievable. Proper note needs to be given to issues mitigating against cycling – hills, distance, lack of joined up lanes, ageing population etc.

SS5 2 d This highlights problems with a plan that includes undeliverable wishes. CCC has no control over whether new hospital facilities will be provided. The government promise of 40 new hospitals will not be realised and Canterbury was not even on the list. This decision is outside the remit of CCC and we should not base a local plan reliant on the unachievable.

C4 Selling off car parks is, in many cases, questionable. Car parking is a major income generator. How will that income be replaced? How will the needs of tourists, shoppers, disabled, young children in prams etc be met? Some of the larger car parks (Watling Street, Castle Row etc) could be redeveloped with a multi storey central parking core surrounded by housing or commercial building as with Whitefriars and Castle Street MSCP.

C5 The need for elements of this policy has been driven by the frankly stupid strategy of the 2017 LP which is further reinforced by this draft plan. The 2017 LP proposed around 10,000 dwellings in the crescent across southern Canterbury from Hersden to Thanington including Sturry, Broad Oak, Littlebourne Road, Mountfield Park. Some 15 competing sites with no proper community or infrastructure masterplanning. Few of these homes have been built so as yet we have no idea of the effect on our infrastructure and particularly the road network. This draft plan proposes around 6,000 more dwellings in his area. This perpetuates and worsens all the problems outlined above.

C5 2 This transport strategy will not be viable with a scatter of uncoordinated housing estates. P&R is expensive to operate and recent cuts to the Triangle Route show the need for viability. The reopening of the Sturry Road P&R, however desirable, will be costly. Adding a 4th site at Merton Park will be a further major drain on council finances.

C5 3 This site is close to the city centre and public transport hubs. Its redevelopment is wholly to be supported. However, existing businesses on the site employ hundreds of people and must be

protected. The number of dwellings proposed (1,000) is questioned. There is an opportunity to build over many of the existing businesses with high quality, high end developments facing the river meadows along Cotton Road. This redevelopment must incorporate a proper bypass for Wincheap and this is not shown.

C6 This is another unlinked housing estate wedged between the Thanington developments and Mountfield Park. It relies on yet another access point onto the A2. This is addition to A2 junctions requiring upgrade at Wincheap and Bridge with a total of 5 junctions from Upper Harbledown to Bridge. Will this be supported by Highways England? Is it a viable plan to spend so much on these new works?

Merton Park proposes 2250 new dwellings added to the 4,000 at Mountfield Park and the 2,000 at Thanington. The A28, South Canterbury Road, New and Old Dover Roads and the ring road simply will not cope. These are already the most congested roads in the city and it is folly to add to the problem. Access routes are not joined up. The 'fast' but route is via a 1 way pinch point down heavily parked residential roads. It will not be fast.

C6 1b(i) This is wholly dependent on NHS policy and government funding. It is no more than an aspiration.

C6 1b(iii) Given the cost of running P&R, is a new P&R long term viable?

C6 2 a&b Lip service to 'garden city principles' which has been applied to all the major developments in the 2017 Local Plan has shown an acute lack of site integration, integrated social infrastructure, 15 minute city access and upgraded transport links. In practise we just have housing estates and the phrase 'garden city principles' is meaningless.

C6 4 Vehicular access to the site is unclear as are vehicular links to adjacent sites

C6 5(f) Given the reluctance of the NHS to provide improved hospital facilities it is most likely this land will be designated for housing which merely adds to the problems outlined above.

C7 Vehicular access to this site is critical. The link road does not appear to join the link road in the adjacent site. Hollow Lane, New House Lane and Cockering Roads are totally unsuited to significant traffic being essentially single track. It is unclear if it is wholly accessed via site 11 in CF1. In particular access from the new 2 way A2 slip road at Thanington needs to be clarified. The community hub and all facilities need to be combined with site 11 above.

C9 This site is totally unsuitable for development. It has no pedestrian access to the A28 or Milton Manor Road both of which are 40mph roads and on bends. Cycle access is similarly dangerous and unsuitable as the site is on a hill. It should be wholly integrated within site 11 policy CF1. Vehicular access is not spelt out. This is vital as the site will be wholly car dependent being too far from any local facilities and without safe cycle or pedestrian access. Being car dependent it will add to congestion on the A28.

C9 4 (a) (i) Ashford Road is 40mph, on a bend with a very narrow footpath on the opposite side of the road. Thus this is unachievable.

C9 4 (a) (iv) (c) The bus service is infrequent, unlikely to be attractive and the A28 will have to be crossed to access it.

C10 This site must be fully integrated into Site 11 CF1. It should be accessed (as should site11) via the 2 way A2 off slip from Dover. Strangers Lane and St Nicholas Road are wholly unsuitable

residential roads on a housing estate. It was previously stated by Kent Highways that this site was unsuitable because the increased traffic could not be accommodated. This begs the question as to why this small site is acceptable on these grounds, never mind the much larger C7 and C9 sites.

C11 This link should be shown within a masterplan for traffic management to accommodate not just a tripling of the population in Thanington but a doubling of the population on the southern side of Canterbury. This area, as stated above, already has the most congested roads in the city.

The treatment of the 5 junctions onto and off the A2 as noted under C6 above is highly questionable and unlikely to be delivered. The status of the 4th slip road at the A2/Wincheap junction is unclear as no satisfactory route has been found. The P&R extension previously proposed onto the water meadows has rightly been rejected. The Wincheap gyratory scheme which is wrongly claimed to be a Wincheap bypass (it does not bypass Wincheap!) is wholly unsatisfactory and will increase rather than reduce congestion at the expense of access to both commercial and residential properties. It does not address the pinch points that cause the congestion ie the A2/Wincheap junction and the Wincheap/Pin Hill/Rheims Way junction. The various Thanington sites should be masterplanned to use the newly constructed 2 way A2 off slip from Dover.

In conclusion

- 1 The Plan lacks vision. To accommodate this number of dwellings a New Town or Garden City must be considered. A 15 minute City which will support viable community facilities, public transport etc. The need to travel by car will only be achieved if local facilities are available.
- 2 There appears to have been no appeal to the Minister for exceptional circumstances to be considered on housing numbers.
- 3 A Canterbury centred approach is wrong because: (i) it will not deliver economic benefit to the area most needed (Herne Bay). (ii) It will add more traffic congestion to our most congested roads. (iii) It threatens our World Heritage sites and the historic city which is our greatest economic asset.
- 4 The Plan is reliant on developers planning the future layout of the city by the SHLAA process. This is not town planning.
- 5 Lip service to 'garden city principles' is carried forward from the 2017 Plan. Competing random housing estates on the urban fringes will not produce sustainable communities.
- 6 I have concentrated my examples on Wincheap and southern Canterbury as it is the area I know best and has the most acute problems. But similar arguments apply, notably in North Canterbury and South Whitstable.
- 7 There are sites for a garden city that could be considered, often in conjunction with neighbouring authorities: South and East of Herne Bay using the Thanet Way, a properly masterplanned and integrated South Canterbury, Chartham using HS1, Brenley Corner using the A2, Manston airport. Doubtless others which a properly qualified town planner would identify. Such an approach will attract central government funding for infrastructure improvement as has happened at Ebbsfleet (see opening remarks above)
- 8 All this requires professional town planning from a qualified consultant or Kent Design of which we are already a member.

