

St Stephens Residents Association response to Canterbury City Council's consultation on the new draft Canterbury District Local Plan to 2040

SSRA consulted its members about their views on a few key policies that were part of the previous **draft Canterbury Local Plan to 2045**, relevant to the north Canterbury area where the Residents Association is located. A summary report of members' responses was then submitted to Canterbury City Council which will now go forward to the Regulation 19 consultation (final comments) and the Inspector's hearing. Following the review and revision of the earlier plan, the new draft Canterbury District Local Plan to 2040 mentions new and revised policies that will have a substantial impact on the north Canterbury area. SSRA has asked residents for their views on **three** key policies in order to put together an updated response to the new draft Canterbury District Local Plan that is informed by members' views.

Seven responses were received to the latest consultation questionnaire which is slightly less than half the number received in connection with the previous consultation. This might reflect a change in attitude following amendments to the Movement and Transportation Strategy for the district which had contained proposals for the controversial 'Canterbury Circulation Plan' and 'Eastern Movement Corridor' in its earlier version.

The following comments were received in connection with the **three** key policies about which SSRA residents were invited to submit their views, although not everyone commented on all of the policies mentioned Responses reflected a wide range of views.

Policy SS3 – Development Strategy for the District

It was generally agreed by respondents that more housing needs to be provided in the Canterbury district but the rationale was queried for the housing requirement of 1,149 new dwellings per year between 2020/21 and 2040/41. The question was asked:

- *What is the evidence and basis for this number?*

and the suggestion made by another respondent that Canterbury City Council should:

- *Review the number of houses/homes needed based upon proper analysis of up to date and accurate information.*

As a Residents Association that is a member of both ACRA and the Canterbury Society, SSRA would like to support recommendations made by those organisations jointly to Pat Edwards, Chair of Planning and Peter Davies, Head of Strategy and Improvement at CCC:

The Canterbury Society and ACRA remain dissatisfied with the approach the City Council is taking to the calculation of an annual new housing supply target for the years 2025 – 2040. We request that you urgently instruct Edge Analytics or a consultancy company with similar competence to revisit the housing needs assessment carried out in 2021. The purpose would be to:

1. *Consider the scope for the Council to invoke exceptional circumstances, both demographic and non-demographic, pursuant to revised paragraph 61 of the NPPF, to justify a non-standard methodology for calculating an appropriate annual new housing supply target.*
2. *Analyse the exceptional circumstances which are relevant in Canterbury District and assemble arguments as to why these circumstances would justify a non-standard approach.*
3. *Having analysed the exceptional circumstances which could be argued, re-run the 2021 calculations and assessment, using the most recently available demographic statistics and trend analysis available for Canterbury District, and making proper allowance for the protection inter alia of ancient woodland, land of high agricultural value, the AONB, SSSIs, river water quality, chalk aquifers and the setting of the World Heritage Site within the District.*

You are by now aware of the trenchant opposition to the allocation for housing development of a greenfield site around Blean belonging to the University of Kent. We believe the strength of feeling about this prospective allocation is indicative of the draft Plan making over-provision for new housing. It is also indicative of unnecessary reliance on large greenfield, rather than smaller brownfield, allocations. The annual supply target you propose is on a scale out of keeping with the types and volume of housing required to satisfy the foreseeable needs of the population living within the District over the next fifteen years. We therefore urge you to act to change course without further delay.

However, the argument for making a plea for exceptional circumstances to justify using a non-standard methodology to calculate annual new housing supply targets is not supported by all SSRA respondents:

- *I can't think of any reason to suggest that Canterbury would be excepted from this national requirement for more houses.*

Four out of the six respondents who commented on policy SS3, Development Strategy for the District, (67%) expressed concern about the 'new rural settlement north of the University of Kent':

- *I agree in general, (with policy SS3) but not with the rural settlement with only one road serving the 2,000 houses. This is far too many houses and any major development should be centred on Blean 'centre' with its A290 for access.*

Other concerns expressed by respondents were not about the proposed number of houses to be built but about the types of housing that should be built:

- *I agree with this housing policy, as long as it provides affordable housing which I think the city needs urgently.*
- *Canterbury does need homes for older people, but not necessarily more and more expensive retirement apartments. Much as developers dislike building single storey properties, these are what many older people desire.*

Respondents who supported the development thought that the north Canterbury location was a logical choice:

- *I do not oppose the N Canterbury development idea. If we accept that Canterbury has to provide more housing (which I do) then of course the houses have to go somewhere. This site is as acceptable as any other likely development around Canterbury. There are already plans for a large development in S Canterbury, The Sturry/Hersden direction is already being massively developed. I would not want further development upstream of Canterbury along the Stour Valley (for environmental and flood risk reasons), so I'm not surprised that they turn to N Canterbury. Much of this is wooded and we should not clear woodland for housing. So the University site is a natural - and the University has to develop to survive. We cannot refuse this one without being able to suggest where it is better to build a significant number of houses.*
- *Although I understand that many people object to the siting of the housing north of the university, I feel that housing is essential and would rather see it here rather than making more of an urban sprawl.*

A comment made by one of the respondents referred to the need to strengthen and support the **sustainable design strategy** for the district (paragraph 1.29) by ensuring that the design of new developments adequately respond to the challenges of climate change:

- *I'm alarmed that there is no reference to the idea that ALL future developments should be 'climate proofed'. Why are we still not insisting on higher standards of insulation, provision of EV charging for all housing and developments, and provision of solar roof panels for all developments?*

2. Policy SS4 Movement and Transportation Strategy for the District

The broad principles of the Movement and Transportation Strategy were agreed with since, as one respondent commented:

- *On roads and transport, our roads are totally inadequate for the volume of traffic we have now.*

The need for development of a viable Movement and Transportation Strategy for Canterbury was acknowledged. However, the economic challenges of implementing and funding a bus led strategy were pointed out by more than one respondent:

- *I do think that it should be noted that the provision of a bus led system of transport is not in the gift of any council, bus companies run or cut routes according to economic criteria not need.*
- *I see that the Sturry Park and Ride is losing money hand over fist and that there are commonly four or five people on a double decker bus. This smacks of putting ideals before practicality and financial prudence, let alone the damage that these huge, empty buses are doing to the environment. My little car is an environmental angel compared to them!*

Also the failure of the strategy to take account of the needs of elderly people, or those who do not have easy access to regular bus services was pointed out:

- *It looks good but takes no account of the thousands of older people who cannot use buses in a convenient manner. I am fed up with being seen as a menace because I drive a car, less than a thousand miles a year. Without it, I would be unable to support my family, continue with my volunteering work and lose my independence.*
- *The result of decades of development in Canterbury has resulted in large spread out estates with many people living a long walk from any bus route, one of the reasons for the rise in car ownership.*

The convenience of car use is valued and respondents do not want to see constraints on their use of private vehicles:

- *I am not in favour of anything which restrict traffic flow around the ring road.*

The corresponding lack of reliability and convenience of bus services is an important factor when respondents make decisions about how to travel:

- *However much we might wish for modal change, it will not happen unless and until there is a reliable alternative to private cars and other modes of vehicles To try to force people out of their cars will be counterproductive.*

However several ideas for encouraging modal shift that support the Movement and Transportation Strategy for the District were put forward via suggestions for encouraging bus and cycle use around the city:

- *I think that more should be done to improve cycle paths in the city. In particular, the Crab and Winkle footpath and cycle path (St Stephens Footpath) is an important thoroughfare for commuting and recreation. The route is heavily used by families with young children on their way to and from St Stephen's Primary Schools. It should be widened, with improved lighting and cctv as well as pedestrian and cycle paths segregated, especially in the area near to the St Stephen's Underpass*

Respondents both to this consultation and previous surveys have raised awareness of the following improvements to bus services and their infrastructure that they would welcome to help enhance passengers' experience of using buses and make it more likely that they would choose public transport when deciding how to travel:

- *Real time information showing bus services actual arrival times displayed on digital information boards at bus stops.*
- *Vandal proof shelters and level benches provided at the majority of bus stops*
- *Illuminated panels on bus stops where timetable information is displayed.*
- *Safe and easy pedestrian access to bus stops, especially those on busy roads.*
- *Audible and visible information about routes and upcoming stops on board buses.*
- *Integration of bus services with train arrivals and departures at Canterbury stations with improved onward travel information at those locations.*

- *A city hopper service available to link key points such as the two railway stations, hospital, park and ride locations and bus station.*
- *Improved, easy to access information about amendments to services.*
- *Restoration of some of the bus services through villages such as Broad Oak and Rough Common that have recently been with-drawn.*
- *A respondent thought that buses would need to be subsidised if not free.*

3. Policy C12- Land north of the University of Kent

A variety of concerns were expressed about the development of land north of the University of Kent outlined in policy C12. The impact of such a development on food production, farming and wildlife and biodiversity was questioned by several respondents:

- *I am concerned about the development C12, land north of University of Kent. Blean Woods is home to many protected species, and I am concerned that development will lead to habitat fragmentation near to this important site and depletion of biodiversity. It seems that measures will be taken to ensure that development is not within 400m of Blean Woods but this is very close. Often the developers reports to support plans are not accurate and give a skewed view of any damage to protected species and biodiversity. How will this be overcome? Should Natural England be consulted?*
- *Building on agricultural land should be avoided at all costs. Now, at a time when the world situation is dangerous and supply routes often precarious, we must be prepared to grow/produce more of our own food.*
- *It would be the destruction of an area of beautiful natural countryside and farmland.*

The increased pressure of traffic on local roads was raised as an additional concern:

- *Even with the suggested additional means of transport and cycle routes, and if car transport was limited, 2000 dwellings would put too much pressure on the local roads.*
- *It will, of course, increase traffic congestion on roads already congested between 0800 and 0930, but this is happening because the population is rising and no one has any practical or achievable suggestions or powers to limit this.*

The increase in pressure on local hospitals and medical services was also pointed out:

- *Our hospitals and medical services are overloaded, and even an additional medical centre would not be sufficient to completely cover 2000 dwellings.*

A compromise with fewer houses being built overall was suggested by one respondent to the SSRA consultation:

- *The development should be very limited and centred on Blean perhaps to say 300 houses.*

St Stephens Residents Association would like to thank all those members who responded to this brief consultation and for the views that were expressed.