

CANTERBURY DRAFT LOCAL PLAN CONSULTATION RESPONSE

Comment by:

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I would like to register the following comments in respect of the DRAFT LOCAL PLAN 2040

IN SUMMARY:

- *The proposal is an oversupply of housing numbers and which are non-deliverable potentially putting Canterbury at high risk of special planning measures*
- *The case for an EXEMPTION case should be reviewed under section 61 of the NPPF and not ignored.*
- *There is a need to balance GROWTH versus Heritage and local Character which is not being done in these proposals with the oversupply housing numbers in the proposals*
- *The TRANSPORT STRATEGY needs a review to take into account the true impact of additional houses, predicted increased vehicle numbers and vehicle trips. Also a full appraisal of the requirements to mitigate for this on the proposed bus and modal shift model.*
- *The DLP2024 needs a total review on the above and has not currently a viable strategic option for Canterbury development in its current form.*

1/ GENERAL COMMENTS:

- For a PLAN to be successful it simply needs to be **DELIVERABLE, SUSTAINABLE & ACCEPTABLE TO THE COMMUNITY.**
- The Housing needs assessment commissioned by the Council (2021) identified 802 dwellings per annum (dpa). The calculated figure using the standard method of calculation calculated 1120 dpa. This standard method calculation is clearly identified as ADVISORY and a STARTING POINT only in the 2023 NPPF & this has been confirmed by Government ministers. If this calculated figure is used it is an OVERSUPPLY ON REQUIREMENT of housing. The average deliverable housing for Canterbury based on stated figures is 572 dpa. The oversupply is 30% ABOVE THE HNA assessment and significantly more than historically Canterbury has delivered.

- This unsustainable figure quoted in the DLP of 1149 dpa should be re-evaluated, and adjusted in the DLP to reflect the true need . Using the option in the 2023 NPPF under sec 61 in an EXEMPTION case.
- This plan is NOT deliverable for the housing numbers planned. A simple optimistic analysis reveals it will NOT deliver even 75% of the 1149 dwellings per annum planned. Indeed it will be unlikely to deliver 65%
- It will then NOT be sustainable because if the housing numbers are not delivered leaving non delivery of developer funded infrastructure as a result.
- It is certainly NOT what the people of SW Canterbury wish as shown in a recent survey by Thanington Parish Council.
- On some proposed sites in the DLP they have been rejected in other earlier Local Plan proposals. The reasons for the past rejections seem to have been swept aside in this plan and do not now appear relevant? C6 and C12 being examples here. These reasons are still relevant and should be assessed. Which they now do not appear to be considered.

- **POLICY C5 SW CANTERBURY URBAN AREA**

- This area is earmarked for 3200 additional homes. This is an area that already has an additional 1150 homes planned in Thanington. Thanington had an original dwelling number of approx. 1100 homes, prior to the 1150 dwelling 2017 local plan allocations. In these additional 3200 will mean that effectively ALL the agricultural and GREEN space land will be allocated for development in Thanington. This will mean that the Thanington area will have TRIPLED in size with these 2 proposals. This is unsustainable. It is also not what the community wished.
- The MASTERPLAN for the area does not give a true appreciation of the scale of the development with the EXISTING development to show the impact of the new proposals.
- Residents of Thanington made it clear in a recent survey that **94%** of those surveyed **(EVERY RESIDENCE IN THANINGTON 20% RESPONSE BY THANINGTON PARISH COUNCIL)** stated their wish that Thanington retain its unique mix of urban and rural identity. These proposals DO NOT allow for that, and will totally remove the rural aspect of Thanington. This can clearly be seen if the masterplan was more transparent.
- **94%** in the survey stated that Pressure of development is leading to a long term negative impact on the way of life in Thanington. Again the proposals take into account that consideration.
- We have not yet seen the full impact of the 2017 Local Plan allocations. We have seen issues with delivery of what was promised in the 2017 LOCAL PLAN.

- **95%** in the survey stated there is a lack of delivered sustainable infrastructure in Thanington from developments in Thanington. We have seen that with the existing 2017 Local Plan proposals
- The 2023 NPPF makes it clear the need for local community involvement to be taken into account. For Thanington this is not being done here.
- The 2017 Local Plan allocations maintained the rural aspect, and this is being negated with the 2040 DRAFT LOCAL PLAN PROPOSALS. C7, C9 & C10 will mean that Larkey Valley Woods an SSSI site will be totally negatively impacted as an example.
- The SOUTH WEST CANTERBURY LINK ROAD should be looked at in more detail.
- This area has some of the most highly congested traffic network in Canterbury with the A28 . The TRANSPORT STRATEGY adopted does not address this issue of significant car numbers in the area. Government generated data on car ownership trends and trips per day has not been taken into account. The measures in the strategy will NOT mitigate for this increase.
- An example of the issues.HOLLOW LANE is exactly that a country lane. It is not suitable for high volumes of traffic. The area of NEW HOUSE LANE, IFFIN LANE, MERTON LANE & HOLLOW LANE has seen increased traffic in the last 2-3 YEARS. These are single track country lanes being used because insufficient supply of infrastructure That is caused by the continuing worsening situation on the A28 into Canterbury through Thanington . The Link Road is reliant on a developer supplied junction MERTON LANE area. The detail and viability and sustainability of that proposal needs reviewing. Not as happened on the proposed 4th Slip Road from the A2 for the existing Thanington Park development. Where an indicative proposal was accepted and then found to be non-compliant, and in all probability now will not be supplied?

POLICY C7 LAND TO THE NORTH OF HOLLOW LANE:

- This site is an addition to the site S11 in the 2017 LP. It was not included in the development area in site S11 because of the impact it would have on the character, environment and heritage of the area. Primarily for the views of Canterbury.
- The land is grade 1 agricultural land
- It is designated as Land of Outstanding Natural Beauty in both historical planning application documents and in recent Environmental Assessments.
- It will have a major negative affect on the landscape setting of the historical city
- The proposal is a complete overdevelopment of the area and will completely remove the last agricultural land in Thanington. This needs reviewing to protect the green surrounds of the city. Which is being eroded and potentially putting the World Heritage Status at risk. A casual viewing of the South Canterbury sites under construction highlights this problem. As do the Eastern approaches to the city.

- In the previous version NPPF there are sections that allow for protection of green gaps and coalescence. These apply in this case, as well as the protection of agricultural land in the 2023 NPPF and its caveats to this.
- It should be kept as a non-developed area as per the survey results of Thanington residents
- It will just further deteriorate the already problematic traffic situation in South Canterbury due to the additional predicted car numbers on top of the 2017 development sites. The transport proposals are totally unrealistic for this site and need reviewing in detail.
- The details of the A2 Junction at Merton Lane and the proposed South West Canterbury Link road will allow more traffic to enter the area and impact on the A28/WINCHEAP congestion. Not remove it from the area. The exiting road network is already experiencing issues with as yet no real major increase in housing numbers. An updated traffic review should be carried out to determine the current situation. Not relying on data that does not reflect reality of today.

POLICY C9 MILTON MANOR HOUSE

- This site is for 100 HOMES and as such has no real potential for major contribution.
- It will add to infrastructure pressures in the area without mitigating for them
- It will form part of the total enclosure of the Larkey Valley Woods SSSI site and the impact this will cause on that area.
- It adds to the unsustainable overdevelopment generally planned for the area.
- It will further erode the character of the approach to Canterbury from the South West.
- KCC have already expressed concerns re the capacity of the junctions onto the A28 from the Ashford Road estate area and this site will add to that issue.

TRANSPORT STRATEGY

- The Canterbury road network has been found to be at or near capacity. Since that report further significant dwellings have been planned. Greater than 20000.
- The strategy proposed requires considerable investment mainly developer funded and then resource to maintain it in the future. Thi needs ensuring it's sustainability which is not clear or detailed
- Taking out road space for Bus & Cycle Lanes and even LVN's, has been shown to actually worsen situations. A logical outcome, if you do not actually reduce the number of vehicles significantly. There is no evidence of details and Data required re reduction level in the Transport Strategy document. What is the predicted numbers

using the proposed buses and how many vehicles will that remove from the network needs clarifying for viability.

- The details given do not show any near enough detail as to the potential costing and funding details for this. A significant proportion being developer funded which can be shown to be problematic to deliver.
- With predicted numbers of additional vehicles from the proposed developments. Which are mainly centred around Canterbury, it is not viable that the proposals will mitigate for the additional traffic pressures that will come from this DLP proposal.
- There are many scenarios where the use of public transport etc. as envisaged will NOT work. The previous Local Plan failed to generate modal shift and this proposal is significantly higher in aspiration for this.
- The comment, that this will be regularly reviewed and if deemed to be failing with the current proposals.. Further measures may well be needed. Does not generate a lot of confidence regarding its success. Indeed it almost implies an expectation of failure and then an imposition of other measures which might
- Much of this is influenced and will be caused by the number of housing proposed. Which has already been stated is an over-supply in the figure required by Canterbury. This adds to the case for an EXEMPTION option for Canterbury to be considered.
- The current strategy does not seem viable as it stands or deliverable in its aims.