

Response to Canterbury Draft Local Plan 2040

I know that others have critiqued the Plan's acceptance of a nationally-imposed housing target (notably the Association of Canterbury Residents Associations) and have pointed out the Housing Secretary's recent statement that the targets are a guideline and not mandatory in cases where Councils can demonstrate that the national formula targets would be damaging to the well-being of their communities. I believe that Canterbury has an excellent case to be treated as an exception because of the damage the housing policies (particularly **Policy C12**) would do to the communities of Harbledown, Rough Common, Blean and Tyler Hill in particular, and to the environmental and heritage assets of Canterbury in general.

I am particularly upset by the proposals contained in **Policy C12** as these would be entirely inconsistent with other policies designed to protect and enhance biodiversity, landscapes, agricultural land, and public rights of way.

I came to know and love the University's northern lands, from Whitstable Road to the Church of Saints Damien and Cosmus in the Blean, during the COVID pandemic, when this became my regular walking route. The therapeutic value of walking to and through this diverse and tranquil landscape, so rich in heritage and historical associations, varied woodlands, and pastures and birdlife, was and is immense.

Walkable in all weathers, the Crab and Winkle Way is a jewel in Canterbury's crown. Policy C12 would change it and its environment beyond recognition. It would destroy the landscape and the tranquillity, and would imperil the green spaces of woodland and the Sarre Penn valley and the birds and animals for whom they are habitat.

Building 2000 houses and commercial buildings, with roads and parking, over this site would be devastating for biodiversity and landscape, but it seems it would also have seriously negative consequences for its neighbours, and particularly for those who live in Harbledown and Rough Common.

The '**primary access**' would drive a road through a conservation area and diminish the green gap between Rough Common, Blean and the University. I can't envisage what kind of complicated junction would have to be constructed so that traffic to and from the site could then travel via Rough Common Road, which, it is clear from the Plan would be expected to be the main road serving the development. Rough Common Road terminates in a steep, winding hill – Palmers Cross Hill – at an already complicated junction with the A2050, which already has a less than satisfactory accident record. We are told that Policy C12 would require the construction of a new all-directions junction with the A2 at Harbledown, but we are given no idea what that might involve and how it might affect residents of Harbledown and Rough Common.

What we do know is that a significant increase in traffic along Rough Common Road will seriously impair the lives of the residents of Rough Common. If the development proposed in Policy C12 were to proceed, it would be wholly unacceptable if unspecified improvements to Rough Common Road (and attendant mitigation) and the A2 junction at Harbledown

were to be delayed until almost 50% of the projected 2000+ dwellings had been occupied (**Policy C12.5. Phasing and delivery**). Even the initial stages of construction of the development as proposed would generate an unacceptable increase in traffic, especially of HGVs, through Rough Common. To mitigate those harms the 'improvements' noted in para 5c, as well as the new junction at Harbledown, would need to be in place *before* any work started on the site. The cost of that would probably render the development financially unviable.

The movement and transportation strategy (Policy SS4) envisages increased walking, cycling and reliance on public transport rather than private cars. In principle, these are desirable. In practice they are unlikely to be very effective. Walking is feasible if the weather is fine and the walker is fully able; cycling, except for recreation, is suitable for only a tiny minority. The topography of Canterbury discourages both. For those who cannot walk long distances or cycle safely, buses might offer an alternative.

But a 'bus-first' strategy presupposes bus services that are frequent and reliable. That works fairly well between the University of Kent and the city centre because demand is concentrated at terminuses that are only 2 miles apart; it manifestly does not work for the many bus routes that cover greater distances with many more stops, and where the service is as a result often unreliable. And it does not work well for those travellers who are proceeding beyond the bus terminus because services seldom connect conveniently, with the result that journeys become very time-consuming as well as unpredictable.

The result is that for those who can afford it, travel by private car is the normal, preferred mode of transport for any destination beyond the city centre. Living in Harbledown, not much more than a mile from the city centre, I cannot rely on the bus to get me anywhere on time. In good weather, on the increasingly rare occasions I venture into the city centre or to the train station, I walk. But, as most of my journeys are beyond the city centre – or in a different direction, I use the car. The convenience of the private car is such that the real cost of keeping one is heavily discounted, and for as long as people living outside urban centres have the necessary disposable income, they are likely to continue buying and using private cars, even if, as in Germany, they drive fewer miles than in the past.

Policies restricting access to parking in the city centre are probably necessary, and with suitably enhanced park-and-ride facilities, they may work. But in peripheral locations, inadequate provision for parking produces only cluttered and unattractive streets as vehicles, often work vehicles, are left parked overnight on verges and pavements (see, for evidence, Hillside Avenue or Garden Close).

Proper planning must take account of how people do, and are likely to, behave rather than to provide different infrastructure in the pious hope that people will adapt their behaviour to suit it. Thus, whilst dedicated, segregated cycle lanes are desirable to increase the safety of cyclists, pedestrians and other road users, they are unlikely ever to be used by much more than 4% of travellers.

Similarly, devoting an increased share of road space to the exclusive use of buses is likely to increase road congestion rather than reduce it. In fact, traffic congestion in Canterbury is

concentrated in a few relatively short peak hours and, in term-time, is associated with getting children to and from a handful of ill-located schools. By all means, design roads to give buses priority at peak times, but allow other road users to make full use of the road at all other times.

I understand that the implementation of the movement strategy is proposed to be iterative, but it will also be experimental. At least two experimental traffic management schemes (Castle Street / Worthgate Place one-way system, and the more recent Westgate Towers scheme) were designed to reduce congestion but were soon abandoned because they actually *increased* congestion and air pollution. I hope that we may be spared other such failed experiments.

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