

Alexander Gunyon

From: Hubert Pragnell [REDACTED]
Sent: 26 May 2024 23:37
To: Consultations
Subject: re: public response to Draft Plan 2030-41 section C12
Categories: Blue category

You don't often get email from [REDACTED] [Learn why this is important](#)

--Email From External Account--

Dear Sir or Madam,

Please excuse my response in extended form rather than question and answer response. I am a resident of Canterbury and have been since [REDACTED].

I have for long been concerned about the increasing on the fabric of Canterbury by the increasing traffic caused by the expansion of what was a small medieval city into a large conurbation linked to surrounding villages by ribbon development. And this of course at the expense of the countryside.

Whilst there are many good points in the revised draft and not least the emphasis on preserving the green environment as much as possible I am particularly concerned with section C12 and the proposal to develop up to 2,000 houses on open country to the north of the University of Kent and thus virtually linking Blean, Rough Common and Tyler Hill; this land previously being unsuitable for house in an earlier plan, and not least due to drainage.

Before further comment I feel it appropriate here to remind you of the words by the then Minister for Housing Planning and Building, Lee Rowley before the House of Commons and as reported in *Hansard* 23 January 2024 :

" Local authorities should be in no doubt that the outcome of the standard method (for assessing Housing Needs) is an advisory starting point for establishing housing requirements through planning. Again for avoidance of doubt, that means that local authorities can put forward their own approach to assessing the needs where certain exceptional circumstances exist.

*It is the Governments intention to indicate that cases for **exceptional circumstances** can be made, that local authorities should weigh up making them and that, if they feel that they have a strong case through the planning Inspectorate process, they should do so for the good of the communities they seek to serve.*

*I am absolutely certain that there will be more cases for **exceptional circumstances** put forward in future, and I encourage councils to consider if they believe that they apply. Logically I would expect more cases for **exceptional circumstances** to be accepted by the Inspectorate although that will also be for the Inspectorate to determine on a case by case basis".*

When I attended a meeting in the Guildhall in Monday 22nd. April on the draft plan we were told clearly that Canterbury City Council could not make out a case for 'exceptional circumstances' and such a situation would only apply in the case of an 'island surrounded by water with only one bridge' This is quite obviously not the case, nor the words recorded in *Hansard*, and is certainly not the only condition set by Parliament and the House of Commons statement. Yet Canterbury

can be seen as an 'island', a city surrounded by medieval walls or their alignment and entered by one gate allowing traffic on to an inner and frequently congested ring road. To this ring, roads converge from all directions and especially from the north. There can indeed be a case made for 'exceptional circumstances' and I would expect the Council to seek such a case, bearing in mind it is a World Heritage Site with a delicate framework of numerous historic buildings both within and beyond the walls.

It is quite apparent from the Parliamentary directive that a local council, in this case, that of Canterbury, should propose a scale of house building appropriate to the needs of the locality and not to the detriment of existing inhabitants and the destruction of valuable neighbouring countryside, in our case valuable for wild life and public recreation. Whilst you have cut the number of houses proposed in the previous draft (2023) from 13,495 to 9,345, there is no need to stick with this number; indeed there is no need to build the extra 2,000 houses, as Parliament is allowing you, the local authority, to set a figure which the locality can reasonably sustain.

In 2021 the Canterbury City Council Housing Needs Assessment (HNA) gave a figure of 802 houses per annum but was increased to 1120 per annum. Yet only 572 houses were completed annually between 2001 and 2021. So the present proposal is an over provision of 548 houses. If you were to continue to complete 572 houses/dwellings annually at this rate between 2030 and 2041 this would come out at 6292. Since the majority of these will be private and unaffordable for people on average income developers will be reluctant to build more than immediately required for reasonable quick sale.

It is therefore very curious that you should suddenly find the need to build 2,000 houses on land previously rejected for such development on ground both of drainage, lack of access and infrastructure. Cynics will say and have, that it is to help the University of Kent who want to sell the land to ease their financial problems. Indeed the new Vice Chancellor has given her full backing to the plan in order to supposedly help meet the local councils housing needs. Of course the Council at the Guildhall meeting denied that the financial incentives of the university would play any part in planning decisions. Perhaps I may now comment on individual section of the Draft Plan.

1. SPACIAL STUDY FOR DISTRICT

1.1 the proposal to build a development mix of 2,000 new home including affordable and accessible housing along with new 3FE primary school necessitating re-siting of Blean School.

It is unlikely developers will wish to include the required proportion of 'social housing' . As for affordable will they be in the range of young first-time buyers, and the age range who may have children. More likely to be retired or families whose children have left home. As for employment where will work be, in Canterbury or further afield, necessitating travel by car and possibly train. Will persons of low income in social housing, perhaps without a car, wish to be housed so far from the centre of Canterbury and reliant on an erratic bus service, and what happens late at night and weekends? It is too far to walk or cycle especially with the intervening hills.

1.8 This district has a wealth of environmental assets with internationally protected sites Important landscape and other habitats.

This is basically admitting the uniqueness of this site and the assets which will be destroyed if this development were to go ahead. You cannot have wild life, precious plants and birds in the middle of a 2,000 house estate.

1.11 This level of growth will undoubtedly place pressure on existing infrastructure such as roads, schools and water supply.

This may be claimed in general for the whole Canterbury City Council area where development is proposed but none more so than in the area proposed in section C12. With many developments and I expect this one, the development would start before much essential infrastructure, which would be abandoned as developments slows and costs rise. The obtaining of water and the treatment of water refuse is absolutely essential before any development here. The Proposed Broad Oak Reservoir is listed in R17 but only as a concept masterplan but no date given for construction or completion. Yet the summers in east Kent frequently lead through lack of water to a hose-pipe ban.

The idea that the development would be fed by an improved local hop-on hop-off bus service working night and day seven days a week is fanciful and totally unrealistic. Residents will need to use their cars for journeys beyond the development placing a heavy addition pressure on the road system. They will not cycle or walk and so cars will provide this additional pressure, especially on two route to the City centre, along Whitstable Road and St Dunstan's Street, and down St Stephen' Hill to Kingsmead. Both these routes have traffic build-ups up to four or more times an hour due to trains crossing and with tail-backs from Rheims Way and London Road to St Thomas' Hill and from North Lane roundabout to St Stephen's Hill, especially in rush hour and wet weather.

1.14. This plan recognises the ultimate value of the countryside within the district and the contribution it makes to the rural character.

It seems to me for the Council to sustain this view is hard if they intend to go ahead with this development, which will destroy for ever so much valuable countryside appreciated by so many local walkers and cyclists along National Cycle Route 1, to create an urban sprawl linking existing villages at the expense.

2 DESIGN AND LAYOUT:

- a. It is to be developed as a Garden City**
- b. open to a complete, compact and well connected neighbourhood where everything needs to be met with within 15 minutes walk or a short cycle ride**
- c. provide a high quality built environment but with high density development around a community hub.**

I cannot imagine the concept of a Garden City as I know it at such places as Bedford Park, Hampstead Garden Suburb, Keston Park or Welwyn Garden City, with what is envisaged here with quality housing and the space for gardens, tree lined roads and wide open spaces within this area. To get 2,000 homes within this space will demand high-rise houses, flats, and close 'rabbit-hutch' development, sadly prevalent in many such developments across the country. The phrase *Garden City* is just 'developers speak' to soften the idea of such a development in the public mind.

2.16 says; there needs to be a significant investment in movement and infrastructure to support the delivery of this new rural settlement supported by a high frequency bus service.

This is quite obvious through the situation and hitherto lack of accessibility to the site and also drainage. It contains no infrastructure to sustain such a large development. Were it to be built is is extremely unlikely, given the national trend to cut local bus services, that such a development would be served by a new high frequency bus service. Such a system would be required all day and night seven days a week throughout the year. Otherwise many residents would feel isolated from the city. A development of this size would require miles of new sewers and this connected to an increasingly overloaded present system beneath the city. And where does waste get discharged into; the Stour perhaps?

2.17 The intention is to create a large area of open space, with significant separation from Blean and Tyler Hill. Also to improve ecological collectivity to key natural assets in areas including Blean Woods.

Such a large development will swamp the area allowing virtually no significant green space or corridors which in any case do not make up for the loss of countryside.

2.18 It is proposed to create a Community Hub

2.19

This will take considerable space if it is to include shops, meeting and leisure halls and will certainly not be the first project ahead of the housing. Connected to this it is proposed to have business and commercial spaces providing opportunities for local employment so it will not be a small village hall in the normal situation. It is also said it will afford an opportunity for local employment. This is basically 'developers speak' and is hardly realistic.

3. LANDSCAPE AND GREEN INFRASTRUCTURE

f. provide a green corridor to link the wider countryside to the city Centre

h. retain ancient woodland.

i. ensure the development does not adversely affect the landscape, ecology, or setting of the Blean

woodland complex in line with Policy DS 23

Destroying open farmland or hitherto countryside cannot be compensated by 'green corridors'. With the density or number of houses proposed whatever the size of the so-called corridor, they will not hide sight of the houses and create the illusion of being in the heart of the country.

No ancient woodland should be destroyed, especially as the Blean is a centre of special scientific interest attracting a wide range of birds, wild life and flowers.

5. PHASING AND DEVELOPMENT

a. provide a waste water treatment centre.

b. secondary access at each stage.

c. Harbledown slip road and Rough Common Road Improvement.

f. Local centre including commercial and community space developed prior to 25% of total

dwellings.

h. a new primary school provided before 25% of total dwellings.

As we all know there has been spillage from existing housing from Ashford eastwards along the River Stour and polluting the Stodmarsh nature reserve, and that this has precluded large scale development in the area until the problem is solved. Not only will there need to be a massive investment for new sewerage but a waste-water treatment centre would be needed before the first house is erected.

Then of course come the question of where the water is to come from to feed the development of 2,000 homes. A new reservoir (R17) had been first mooted for the area in the 1950s when there was only half the number of houses in the area. Now we have double and water is increasingly scarce at periods of drought which are occurring more frequently and yet the construction date for the reservoir at Broad Oak does not feature here as necessary before such development. From construction starting to filling might take up to 15 years; also where is the water to come from. There is not enough in the Stour.

Where are the access points going to be for this development, necessary before building work can begin? One is proposed where Blean School stands at present. Yet this will have to be moved before this access road can be built. Where is the second point of access; perhaps near Blean and along the route of National Cycle Route 1 past Park Wood development.

Improvements are promised by way of access along Rough Common Road. This would entail cutting residents gardens and banning roadside parking to provide sufficient width. It would blight the existing houses and prohibit sales and purchase of houses. The Harbledown slip-road from the Palmers Cross Hill will cost millions of pounds; will Kent County Council Highways Department pay for this at the expense of more important and beneficial road projects elsewhere in the county? I do not think so!

Having a leisure centre and commercial and community space before 25% of dwellings built and occupied will be unlikely until developers see how or if properties sell and at what rate?

The new primary school with 3 FE suggests there will be an influx of parents with families more than their are now. I question how far young families would want to settle in an isolated estate. Where do such children go to school when they reach secondary age? A long bus or car journey, more likely the latter. And where do residents of working age work; there is not much employment in Canterbury other than in education or the hospital.

Conclusion:

Finally this is not a case for saying 'not in my back yard', no houses here! We all realise that we need houses built to a high standard and serving both private demand and social needs for which there is a loud national call. However such developments need to be near centres with amenities such as shops and with good communications from the start. These include a nearby railway service and main roads, including if possible of motorway standard. We have this in the vicinity of the Thanet Way. This proposed development adjacent to The Blean is isolated and two miles from rail and motorway connections. It is worth pointing out that back in the late 1970s there was a plan to develop up to 470 houses on land owned by St Edmund's School on land to the west along Neals Place Road (Water tower site) which was thrown out by an Inspector after a public enquiry on grounds including creating additional traffic.

So I most strongly oppose this development which is not in the interests of the existing local population and will place an unbearable strain on the existing infrastructure.

I shall expect the Council to do what Central Government has offered and ask that Canterbury be accepted as a City for **Exceptional Circumstances** to be applied when formulating the needs for

future planning and housing allocation for the period 2030-41. If the Council refuse to do this for its citizens then I expect there will be calls for a judicial review and a major public enquiry which will hold up this aspect of the Draft Plan for some years. I would not be surprised if this proposed development is rejected by the planning inspectorate at the earliest opportunity.

Hubert Pragnell MA Ph.D

