

Response to the Draft Canterbury District LOCAL PLAN 2040

By Jim Hawkins, resident of Canterbury.

Responses to chapter 1 Spatial strategy for the district

Policy SS2 – Sustainable design strategy for the district

SS2 paragraph 4 states that “New communities of more than 300 homes should contain accessible community hubs”.

- Policy C6 Land at Merton Park specifies 2,250 new dwellings but only one community hub, in Policy C6 paragraph 1(b)(iv).
- Policy C12 - Land north of the University of Kent specifies 2,000 new dwellings but only one community hub, in Policy C12 paragraph 1(b)(i).

The policy shouldn't be stated in terms of hubs per community. The policy should instead be stated in terms of dwellings per hub, or it should specify a maximum number of dwellings that can be counted as one community.

Without a proper specification of how many community hubs are required these new developments become nothing more than dormitory suburbs. They add nothing but surface area to Canterbury.

Policy SS3 - Development Strategy for the district

Paragraph 1(a) specifies “an average of 1,149 new dwellings per year” of the plan, which covers 20 years. That's a total of 22,980 new dwellings. If an average of two adults per new dwelling is assumed then those new dwellings would accommodate an additional 45,960 people in the district.

The local plan refers to the 2021 census, which gives the population of the district as 157,400. The addition of the 45,960 people accommodated in the new houses would represent an approximate increase of 29% in the population, over 20 years. This is far in excess of a realistic projection.

According to the census the population of the district increased by only 4.1% between 2011 and 2021. For reference, see the Office for National Statistics (ONS) page here for example.

<https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000106/>.

That page says this.

In Canterbury, the population size has increased by 4.1%, from around 151,100 in 2011 to 157,400 in 2021. This is lower than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800.

Accumulating a 4.1% increase over ten years for another ten years gives an increase of about 8.16% in 20 years.

Expecting the district population to increase by 29% in 25 years, as the local plan does, is unrealistic. The plan should instead expect an 8.16% increase, and specify an accordingly reduced number of new houses.

For example, 320 new houses each year for 20 years would be a total of 6,400 new houses. That would accommodate an additional 12,800 people, which would represent just over an 8% increase in population.

The local plan should also relate its policies for numbers of new houses to a national or county policy that is justified by analysis.

I made the same comments as on the previous draft.

Other comments on Chapter 1: Spatial Strategy for the district

It's good that this section has been removed: East Canterbury – strategic development area.

The plan doesn't give a reference for the UNESCO World Heritage Convention list entry for the site Canterbury Cathedral, St Augustine's Abbey, and St Martin's Church. Maybe it should include this link

<https://whc.unesco.org/en/list/496/> or at least give the list number.

The council's web page that announces the draft is here. <https://news.canterbury.gov.uk/consultations/canterbury-district-local-plan-to-2040/>

Under the heading What's changed since the last draft plan? one of the key differences is stated as

a fall in the number of new homes proposed by a total of 4,149 – from 13,495 to 9,346 over the life of this plan compared to the previous draft plan

However, policy SS3 – Development strategy for the district paragraph 1 of the previous draft stated that

between 2020 and 2045 provision is made ... for:

(a) An average of 1,252 new dwellings per year".

Over a 25 year period, 1,252 new dwellings on average means a total of 31,300 which is many more than the 13,495 mentioned on the web page.

Responses to chapter 2 Canterbury

Policy C1 - Canterbury city centre strategy

Paragraph 8

There should be a plan for Canterbury Castle to open. For example, donating it to English Heritage or a similar organisation with a brief to maintain and open that type of property.

Canterbury Castle is a Grade I listed building and Scheduled Monument. The list entries can be seen here on the Historic England website for example.

- <https://historicengland.org.uk/listing/the-list/list-entry/1252100>
- <https://historicengland.org.uk/listing/the-list/list-entry/1005194>

English Heritage already own St Augustine's Abbey in Canterbury, and Conduit House. They may accept Grade I listed properties as donations, according to their website here.

<https://www.english-heritage.org.uk/support-us/donate-now/donate-an-object>

See under the Gifts of Properties heading.

Paragraph 10

The list of open spaces doesn't mention for example Greyfriars Gardens nor the Abbot's Mill gardens and project.

Paragraph 11

Good to see that the Canterbury Circulation Plan has been abandoned.

Policy C2 - 43 to 45 St George's Place

No comments.

Policy C3: Land north of Canterbury West Station

No comments.

Policy C4 - Canterbury City Centre Regeneration Opportunity Areas

The plan doesn't mention the former Debenhams and Nasons sites, although the previous draft did. Those sites are quite prominent to anybody walking around Canterbury city centre. But they're closed and boarded up, like many other shops. This gives a poor impression of the city and its economic health to any visitor or resident.

There should at least be a plan for the former Debenhams and Nasons sites. They have sat boarded up for too long. Maybe they could be adapted for residential use so that more green open space in the district could be preserved.

Policy C5 - Canterbury Urban Area

Paragraph 2

Implementation of the Canterbury District Transport Strategy should lead to more green spaces in or near to the city centre. Or it should be abandoned.

Paragraph 6

Shops shouldn't have such a high priority. As everyone knows, bricks-and-mortar retail is declining.

There are a lot of boarded up retail premises in the city centre, including the substantial former Debenhams and Nasons sites. Maybe they could be adapted for residential use so that more green open space in the district could be kept.

Paragraph 7

There should be specific details of the protection, enhancement, and expansion of the city's network of open spaces. The plan is vague about that, but very specific about all the new houses and roads that can be built.

South West Canterbury Strategic Development Area

Policy C6 - Land at Merton Park

The plan should be protecting existing open space and the rights of way across it. The plan paragraph 2.14 claims that there will be new publicly accessible open space. What appears on the map though, and based on the number of new homes to be built, is a reduction in open space, publicly accessible or otherwise.

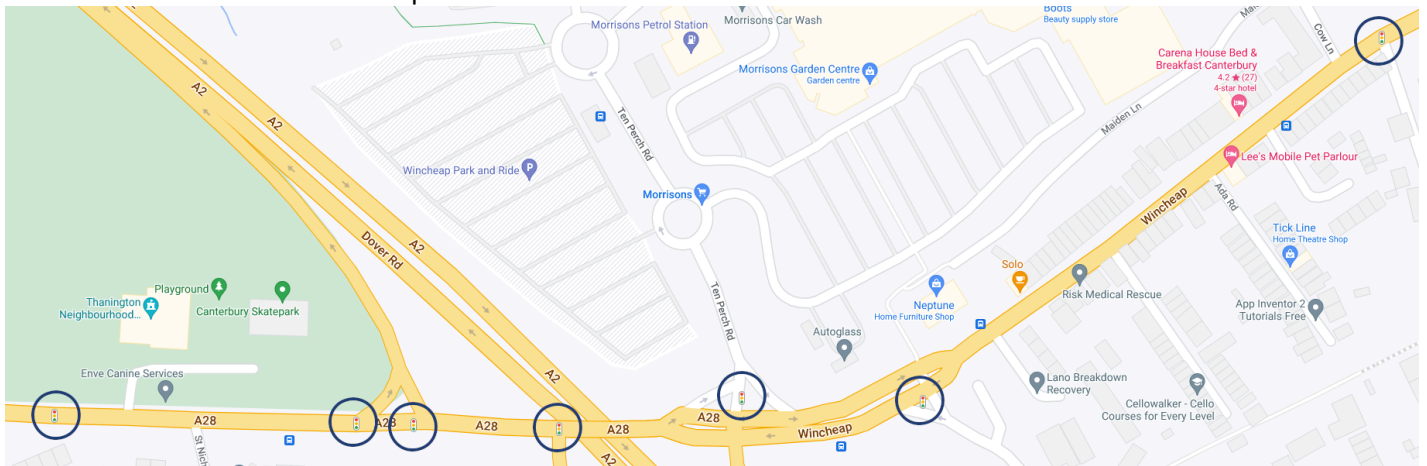
Consider a large field that is privately owned with a public right of way (PRoW) across it. Then consider covering 90% of the field with houses and making the 10% remaining into a public park. That represents an increase in public accessibility but a decrease in the amount of green space, and therefore a worse environment.

The plan should be preserving or increasing the amount of green space, public or private, not reducing it. The plan should recognise that land with PRoW can contribute as much or more to the environment as public access land.

The plan should allow fewer houses, or none on the existing open green spaces. Same goes for the business floorspace.

The plan shouldn't add more junctions and connections to the A2 and A28 unless some of the existing junctions and slip roads are demolished. There are already about seven sets of traffic lights on the route from Thannington through Wincheap, due the complexity of the junctions and connections.

This is shown on the attached map.



The plan shouldn't add a new Park and Ride facility unless it removes one or two of the existing facilities, in Wincheap and by Old Dover Road for example. Otherwise it's just more tarmac and less green space.

The plan claims to create new grassland, woodland, and hedgerows but the map only shows a reduction of current green spaces.

(The previous draft and questionnaire allowed for comments on the whole plan for South West Canterbury, which was Policy C5. That isn't allowed in the latest draft and questionnaire.)

Policy C7 – Land to the north of Hollow Lane

Same comments as C6. The map makes clear that the plan's intention is that a current green space should be replaced by roads and houses. The adjacent green space has already been destroyed by having the dormitory suburb of Saxon Fields built on it. The plan shouldn't destroy more green space.

Policy C8 - Nackington Police Station

It's good to see a brownfields development, in this case converting a police complex into housing.

Paragraph 4(b) mentions Merton Road. If that's a mistake and it should say Merton Lane then it should be corrected. Otherwise the map should indicate the location of Merton Road.

There is a current short piece of road giving access to the A2 from the police complex. It might be for police only. The plan should say what's happening to that access.

The access road is indicated in the attached map.



Nackington Policy Complex access to the A2

Policy C9 - Milton Manor House

Same comments as C6. The plan should protect existing green space and shouldn't cover it with roads and houses.

Private Eye magazine, in issue 1604, alleged that some ex-councillors had an interest in the land. That could have contributed to the development being approved. So it's potentially corrupt as well as bad for the Canterbury environment.

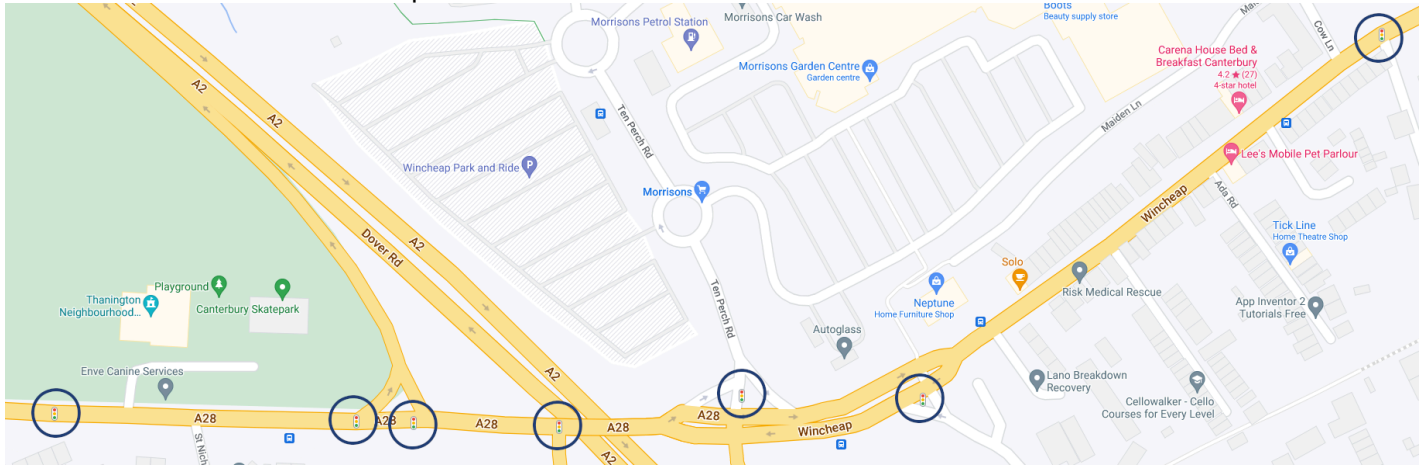
Policy C10 - Land to North of Cocking Road

Same comments as C6. The plan shouldn't allow more filling in of green spaces with roads and houses.

Policy C11 - South West Canterbury Link Road

The plan shouldn't add more junctions and connections to the A2 and A28 unless some of the existing junctions and slip roads are demolished. There are already about seven sets of traffic lights on the route from Thannington through Wincheap, due the complexity of the junctions and connections.

This is shown on the attached map.



The plan shouldn't add a new Park and Ride facility unless it removes one or two of the existing facilities, in Wincheap and by Old Dover Road for example. Otherwise it's just more tarmac and less green space.

Policy C12 - Land north of the University of Kent

It's good to have some details of the plan in this area. The previous draft had no detail. However, what the plan now specifies is destruction of most of the current green open space between the villages of Blean and Tyler Hill.

The plan should be preserving or increasing the amount of green space, public or private, not reducing it.

The plan should allow fewer houses, or none, on the existing open green spaces. Same goes for office and business space.

Policy C13 – Becket House

It's good to see another brownfields development, in this case converting a BT technical building into housing.

Policy C14 – Land at Station Road East

The plan seems to specify building on what is now the station car park. The plan should specify then where rail passengers will park their vehicles.

The map claims some opportunities for improved access and safety for cycling and walking. However the areas indicated are already walking and cycling routes. The plan should either specify what improvements will be made, or shouldn't make misleading claims of improvement.

Policy C19 – Land at the former Chaucer Technology School

The plan should make the location of this development more clear. For example the names of the adjacent roads should be given.

Policy C16 - Land at Folly Farm

The plan should make the location of this development more clear. For example the names of the adjacent roads should be given.

This is another encroachment of housing onto green space. The plan should be preserving green spaces instead of allowing them to disappear under concrete, brick, and tarmac.

Policy C17 - Land at Canterbury Business Park

This is an encroachment of business premises onto open green space. The plan should be preserving green spaces instead of allowing them to disappear under concrete, brick, and tarmac.

Policy C18 - Land on the eastern side of Shelford Landfill

No comments.

Policy C19 - Wincheap commercial area

The plan shouldn't require the Wincheap gyratory scheme mentioned in paragraph 4(b). The scheme has been challenged by local residents and businesses. Despite that, Kent County Council (KCC) and Canterbury City Council (CCC) both have

- refused to accept any petition relating to the gyratory scheme.
- refused to hold any public consultation.

The builders that are paying for the work, originally Redrow, also refuse to consult with the public. A spokesman for Redrow did promise that "Once a start date has been established, we will be consulting local businesses and residents in the months prior ..." as reported in the Kent Messenger, 26apr2022 see

<https://www.kentonline.co.uk/canterbury/news/ridiculous-one-way-system-plan-pushed-back-266112/>.

Redrow organised a meeting 08nov2022. At the meeting, Redrow and their public relations consultant tried to keep out local residents, and refused even to refer to the meeting as a consultation. So they seem to have gone back on their commitment.

The proposed gyratory system has a number of flaws, discussed on The Wincheap Society website here.

<https://www.winsoc.org.uk/wincheap-gyratory-system/>

The society has proposed an alternative scheme in their Wincheap 2020 Vision report, which is also available from their website.

The local plan shouldn't force flawed schemes through when better alternatives have been proposed, and should require proper public consultation. To do otherwise is undemocratic.

The map seems to show a green corridor running across the gyratory road. That is inconsistent and the plan shouldn't be inconsistent.

The map overlay shows the gyratory route following a gentle curving path. However, the actual roads involved in the scheme have at least three sharp corners. It would be safer and better for air and noise pollution to have a gentle curving path, which is presumably why the plan shows that. However, it's misleading and the plan shouldn't be misleading about the impact of the proposed scheme.

The plan specifies in paragraph 1

- (a)(i) Reprovision of the equivalent of the existing level of business, commercial and leisure floorspace.
- (b) 1,000 new dwellings.

The site boundary doesn't include the present supermarket and other shops to the south west, nor their car park, nor the current Park and Ride facility. It seems like the plan specifies much more than will fit within the site boundary. The plan shouldn't specify so much in such a small space.

(The previous draft specified only 300 new dwellings in the same area, already too much.)

Paragraph 2(e) specifies that "older persons housing should be located within the community hub". However, there isn't a community hub on the map nor mentioned in any other paragraph in the C19 policy.

Paragraph 3(c) mentions a couple of local nature reserves. It should also mention Bingley's Island aka Bingley Island.

Policy C21 - Canterbury urban area regeneration opportunity areas

No comments.

District-wide strategic policies

Policy DS1 – Affordable housing

Presumably the plan follows the definitions of affordable housing that are in the glossary in Appendix 2. Those definitions are given in terms of percentage deductions from market rates and prices. Presumably the source of those definitions is the National Planning Policy Framework (NPPF). That framework shouldn't be used by the local plan.

The Affordable Housing Commission of 2020 concluded that many products meeting the NPPF definitions aren't in fact affordable. See for example this research briefing on the House of Commons Library website.

<https://commonslibrary.parliament.uk/research-briefings/cbp-7747/>

The briefing proposes that affordability should instead be defined in terms of a Housing Cost to Income Ratio (HCIR).

The local plan for Canterbury should adopt a definition of affordable housing that will actually result in housing that is affordable by local people.

Policy DS21 – Supporting biodiversity recovery

The plan specifies use of the Natural England biodiversity metric to measure biodiversity. That metric is characterised as “habitat based”, for example on the official website here.

<https://www.gov.uk/guidance/biodiversity-metric-calculate-the-biodiversity-net-gain-of-a-project-or-development>

That seems like quite a weak measurement, and one that doesn't fulfil the dictionary definition of biodiversity. A hedgerow on its own doesn't represent biodiversity. Actual biodiversity would be measured by counting the number of different animal and plant species in an area, for example. That type of measurement is proposed by the Royal Society and discussed on their website, for example here.

<https://royalsociety.org/topics-policy/projects/biodiversity/how-do-we-measure-biodiversity/>

The plan should be ambitious about increasing biodiversity, instead of being ambitious about increasing the size of urban Canterbury, and the surface area of concrete, brick, and tarmac in the district.

Carried Forward 2017 Local Plan Policies

2017 Local Plan strategic site allocations

Policy CF1 - Strategic site allocations

Site 1: South Canterbury

The plan specifies 4,000 dwellings will be allowed. Paragraph 8.5.1 gives the planning application reference CA//16/00600. The public notice for that application says it is a “Proposed Development at Land north and South of New Dover Road Canterbury, extending north to Canterbury-Dover railway line, west to Nackington Road and south to A2”.

That's a very large area of green space that will be replaced by roads and houses. The plan shouldn't be to destroy more green space so policy CF1 shouldn't be carried forward.

Site 11 - Land at and adjacent to Cockerling Farm, Thanington

Same comments as on policy C10. This shows more filling in of green spaces with roads and houses. The plan shouldn't be to destroy more green space so policy CF1 shouldn't be carried forward.

Policy CF2 - Housing allocations

The Canterbury sites all look like brownfields developments, which is good. The plan should have more of this. For example it could specify that the old Debenhams and Nasons sites could be converted to residential.

Monitoring indicators

Paragraph 9.4 states that the “council is seeking views ... on how best to monitor these matters effectively”. The matters are in the paragraph 9.3 list. Here are my views on how to monitor a couple of the listed items.

- “whether housing and affordable housing targets are being met”
This should be monitored by calculation of a Housing Cost to Income Ratio (HCIR) metric based on local pay. That would monitor whether housing is affordable by local people.

Local pay statistics could be provided by, for example, the Annual Survey of Hours and Earnings (ASHE) from the Office for National Statistics (ONS). The survey's home page is here.

<https://www.ons.gov.uk/surveys/informationforbusinesses/businesssurveys/annualsurveyofhoursandearningsashe>

- “the delivery of the 20% biodiversity net gain”
This should be monitored by counting the number of different animal and plant species in an area. That type of measurement is proposed by the Royal Society and discussed on their website, for example here.
<https://royalsociety.org/topics-policy/projects/biodiversity/how-do-we-measure-biodiversity/>