



CCC Consultations <consultations@canterbury.gov.uk>

Local PAn Consultation

1 message

11 January 2023 at 17:56

To: consultations@canterbury.gov.uk

Dear Canterbury City Council,

I am responding to the consultation on the Local PAn through this email.

I also wished to respond to the questionnaire that apparently exists. Despite many attempts I still have not been able to find this questionnaire, which invites Agree/Disagree responses to various proposals, so I am told.

If you find that there is a low response rate to this questionnaire I would suggest that difficulty of finding it is the reason, rather than any lack of interest in, or concern about, the proposals in the PAn.

Environmnet

The impact of climate change is the biggest threat that we all have to face and the Council has recognized this by committing itself to addressing the issue as far as it can.

However the PAn is inadequate as a repose to this historic emergency. The main thrust of the PAn appears to be to build a large number of houses – well above the Local Assessment of Need. In support of this, it also p[roposes major new road works. Indeed the extra housing is proposed, in part to enable funding to be obtained for the road works. These two proposals stand together and must be changed. Together they will make it more difficult for the Council to achieve reductions in global-warming emissions. The construciotn of new houses creates more greenhouse gases, as the extra r=tfreaffic they generate adds to this. In addition there needs to be clear proposals for any new houses to be built to the highest environmental standards. I see no evidence of this in thr PAn.

Housing

The plan proposes a minimum of 1200 new homes to be built per year between 2023 and 2045. This is an increase over the 800 per year in the current local PAn and the 600 per year which has been the recent average. This is above the target currently demanded by the ovmernt. In any case the Government's position on housing targets appears to be shifting. The Secretary of State for Leveling Up, Housing and the Environment, Michael Gove has pledged that housing targets should be "an advisory starting point, a guide that is not mandatory." He stated that "It will be up to local authorities working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area." Canterbury City Council should adopt this principle, which has been conspicuously lacking in its approach to new housing in recent years. When the proposals for Mountfield Park were finally made public in the autumn of 2015, the developer stated that these proposals had been under development for nine years. Discussions had also taken place with various bodies such as Utility and Transport companies but not with any local community organizations

The proposals for Housing Targets have little to do with the real needs of the community where there are significant waiting lists for affordable rented housing. The developer-led plans for housing do not address this real social need and should be reconsidered in the light of the real needs of the community .

In addition the existing housing stock is creating more waste than the local water company can cope with, as evidenced by the regular discharge of sewage into the sea. The Mountfield park proposals adopted a completely cavalier attitude to waste disposal whereby waste from the initial cohort of dwellings would be taken away by lorries form a cess-pit. The

subsequent provision of waste water treatment is vague and inadequate. The Plan does not adequately address the crucial issue of how the additional waste of 1200 extra houses a year for 20 years will be managed. Before the Plan can be adopted this issue must be resolved.

Transport

The Plan proposes two major new roads as an attempt to deal with traffic congestion. There is also the proposal to divide Canterbury City into five zones between which transport is restricted. This depends on the construction of the Eastern by-pass. This whole proposal must also be reconsidered. The alleged need for such a by-pass is the fundamental reason for the excessive housing targets as this will be a means of funding the new roads. The proposed roads will destroy important woodlands and green spaces which are at a premium in Canterbury.

The Plan rests on a number of contestable assumptions. These include the bias in favour of "development" over-riding other considerations such as the need to preserve high quality agricultural land. We have been made aware in the last year of how important it is for us to be as self-sufficient as possible in food policy, so there needs to be a very good reason for taking out arable land for building. The Council has argued in the past that the NPPF requires housing targets of this magnitude. Given the new attitude towards housing targets as expressed by Michael Gove it is time to revise those targets so that they respond to the real local needs.

In the light of these concerns and the many cogent arguments expressing similar concerns by representative community organizations from across the District I urge you to pause discussion on the Plan, so that evidence-based revisions to the Plan can be developed and consulted upon..

With best wishes

Huw Kyffin

