

ALLIANCE OF CANTERBURY RESIDENTS ASSOCIATIONS

CANTERBURY CITY COUNCIL DRAFT LOCAL PLAN 2045 CONSULTATION NOV 22 – JAN 23

FORMAL RESPONSE

INTRODUCTION

ACRA is grateful for the opportunity to comment on the latest iteration of the draft Local Plan

This submission is consistent with the formal statement* recently issued by the Local Plan Focus group of local community organisations, convened by the Canterbury Society, and complementary to the many responses sent in from ACRA member residents associations /societies and individual members of those groups

*Attached for ease of reference

ENVIRONMENTAL IMPACT

ACRA acknowledges the real difficulty faced by CCC in achieving a balance between environmentally progressive and sustainable policies on matters such as open space, biodiversity, air quality, trees and hedges etc whilst adhering to relatively inflexible national planning guidance dominated by very challenging housing targets set by national government.

ACRA is pleased that despite those national constraints CCC has issued very clear statements of intent on environmental improvement although their impact is not only patchy, with large parts of S Canterbury seemingly overlooked, but overall severely compromised and damaged by an excessive road building programme including the proposed eastern movement corridor and northern link road

ACRA formally objects to those two specific new road proposals because they are unnecessary and will have a significant adverse environmental impact

HOUSING TARGETS AND DEVELOPMENT SITES

To comply with government guidance the main feature of the Local Plan is housing and ACRA also formally objects to the quantum and location of these latest proposals which are

deeply flawed because there are supply lead .The plans amount to little more than a random collection of sites put forward by developers keen to take the easy option of building on greenfield open space for reasons of profit maximisation . This approach inevitably leads to a process of reverse engineering in which necessary infrastructure development is fragmented and shoe horned into the nominated sites without consideration of community beneficial cohesiveness and optimal resource usage across wider Canterbury area.

.Housing numbers and the size of individual units are determined solely by their capacity to free up funds for the construction of the aforementioned superfluous new roads The unsustainable overconcentration of the proposed developments in the areas to the east and south of the city is ill thought through and unacceptable

PAUSE FOR REFLECTION AND RE-EVALUATION OF COMMUNITY PRIORITIES

ACRA believes that following the recent statements by the Secretary of State for communities CCC should now pause for reflection and seriously consider a quite different approach based on the real needs of the local community

If CCC were to decide to do this it would have ACRA's full support and we would play our full part in the progressive development of genuinely needs lead proposals

Key to such an approach is the usage of more up to date statistics which take account of the latest local demographic trends and changes in student numbers and their accommodation of choice. The most pressing need in the area is for social housing and low cost housing for young people and families .

It is this need which should be the main focus of CCC's planning intentions rather than large 3 -4 bedroom homes on greenfield sites which are unaffordable for many local folk .

GENUINE LONG TERM SUSTAINABILITY

Long term sustainability in all its guises has to be the building block of a successful Local Plan and this latest set of proposals signally fail to provide any convincing reassurance of deliverability

ACRA fundamentally objects to the loss of prime agricultural land for housing /commercial development Homegrown food has to be a national priority .

ACRA has major concerns about fresh water supplies over the longer term in an area already formally recognised as water stressed . Foul water and sewerage discharge problems are already well documented and we find the remedial measures set out in the plan for both fresh and foul water less than convincing .

CREATIVE 21st CENTURY TRANSPORT PLANNING

Mention has already been made of the absence of any credible justification for an eastern movement corridor or northern link road .ACRA does not believe these are necessary .They are conceptually unimaginative and outdated..

Instead the most pressing requirement which cannot be delayed until 2040 onwards is the need to tackle the problems of city centre congestion air quality and integrated flexible public transport responsive to public demand and designed to facilitate progressive modal shift .

ACRA strongly urges CCC to give very serious consideration to the imaginative and far sighted proposals being put forward by CAST . These are practical ideas which can be implemented incrementally and are far more realistic than some big bang approach decades later which is entirely dependent on final stage contributions from(at that point highly reluctant) developers.. An extremely high risk strategy as evidenced in recent weeks by delays with the Howe Barracks and Wincheap Gyrotory schemes .

The proposals for city centre traffic sectorisation are not acceptable .It is absurd to believe that a system that works relatively well in a large city (Ghent) on a large flat area of land is transferable to a small medieval city in a topographical bowl .Whilst residents accept that the proposals are decades away and much can change in that time the underlying reason for their concern is a lack of confidence in the planners of this scheme who do not apparently realise that the lifeblood and spirit of a small city community is dependant on free and easy access to all areas

BETTER CONSULTATION PROCESS.

ACRA strongly believes that CCC should change its Local Plan consultation process from one of stop start with long periods of intervening silence to one of progressive community engagement and simplified public communication .

Many residents have complained of difficulty of navigating both old and new versions of the CCC website .If and when they do reach the Local Plan section they are confronted with an extraordinarily complex and lengthy questionnaire which whilst completely appropriate for professional users is almost incomprehensible to the layman .

Many residents have declined to use it for these reasons and accordingly ACRA believes that any statistical analysis based on questionnaire responses should be treated with extreme caution and certainly not regarded as an accurate reflection of overall public opinion .

CONCLUSION

The key message from ACRA is that this Plan as it stands is deeply flawed and that CCC should now take the opportunity proffered by Mr Gove to reflect and consider a new approach based instead on the holistic needs of the local community rather than central government dictat

David Kemsley

Business Secretary ACRA

11th January 2023