

The parish council has the following concerns/questions in no particular order:

Item/proposal:	Summary feeling:	Comments:
<p>Housing numbers proposed. There is a requirement to provide 1252 new dwellings per year – this figure is set by the government’s ‘standard methodology’ in use since 2019.</p>	<p>CONCERN We do not believe the plan to 2045 does allocate sufficient housing to meet the government’s housing numbers.</p>	<p>This draft Local Plan requires successes on its planned infrastructure delivery – and will still need massive housing provision to give the developer contributions amounts needed to meet this infrastructure cost. Point 6.23 and the Table in 6.4 of CCC’s Development Topic Paper (October 2022) gives a residual housing need requirement for 30,709 units – and demonstrates a figure of 30,746 over the plan period as a whole. This is a surplus of just 37 units. Furthermore this calculation already includes windfall numbers. Is this sufficient ‘wiggle room’ to meet housing number requirements to 2045? Despite the recent announcement that housing numbers are no longer mandatory but advisory, our understanding is that it is not as simple as it sounds – Housing numbers are set using a standard methodology – and whilst local authorities can challenge housing number targets set, they need to demonstrate non-deliverability of the targets – for example if a council has no available land – eg if it’s already fully built up, and/or any land remaining has designations such as green gap or SSSI. This is not the case for the Canterbury district and the Inspector could challenge as CCC does have suitable and deliverable sites being put forward by landowners / agents / developers.</p>
<p>In Autumn 2023 the final draft goes to a government inspector to determine whether it is ‘sound’.</p>	<p>CONCERN The inspector may find the plan ‘unsound’ in terms of housing numbers</p>	<p>There is a concern regarding availability and deliverability of the largest strategic site allocation – Policy R1 Land at Cooting Farm, Adisham, for 3,200 new homes. Here the major landowner has stated their land is not, and will not be made available. (CCC’s response to this is that there is a reasonable prospect that this will change during the lifetime of the plan.) This, combined with the surplus of just 37 units to meet the Local Housing Need to 2045, and the concerns about the deliverability and availability of the Cooting Farm, Adisham site we feel it is highly likely the Inspector will find the plan unsound – and advise CCC to allocate more sites for housing. The inspector could signpost/choose other sites for CCC if he/she deems necessary. CCC may also review and allocate other sites for housing in the Regulation 19 draft to the Inspector. Such sites could be chosen in haste and be unsuitable. Does CCC have a back up plan for reserve sites? Has enough work already been done?</p>
<p>Costings in the CCC Draft Infrastructure Delivery Plan (October 2022)</p>	<p>CONCERN about costs given current High inflation etc</p>	<p>The fear is that thousands of houses will get built but without the planned road infrastructure being developed, as the build costs will always be exponentially out of reach. And that it isn’t just about road infrastructure costs and viability – but the knock on effects on the amount of actual provision of affordable housing, recreation and open space facilities, etc.</p>

		With an uncertain housing market, there may well be very long delays before the new roads are operational – all the time with major new build development being built with ever-increasing congestion impacts.
Insufficient Foul drainage capacity - Southern Water only review requirements after a permission is in place, and have a five-year programme of work	MAJOR CONCERN	A Grampian condition, to phase builds to align with available Foul drainage capacity, <i>must</i> be imposed on <i>all</i> outline planning permissions, in order to phase occupancy of development to align with the delivery by Southern Water of any sewerage network reinforced required to serve that development.
Rural Service Centres / Local Service Centre designations	OPPOSED to classification	The Canterbury District Local Plan Development Topic Paper (October 2022) point 3.16. identifies Westbere amongst others as a “Local Service Centre” where these settlements are said to “provide a more limited range of services and facilities than rural service centres. Westbere Parish Council feel that Westbere should be classified as a Hamlet as described in point 3.17 – where there are either no services or very limited services – and its rural character should be protected. Westbere has no shops and its only facility is The Yew Tree Public house. Therefore, Westbere Parish Council cannot understand how its tiny village could be classified as a Local Service Centre.
High quality housing design	Statement SUPPORTED	We appreciate and welcome that water usage in new developments is tougher than the national requirements. Plus carbon-neutral elements and sustainability are key components. In terms of High quality design - How will this be achieved in reality? How do we get away from the bog standard Red Row/ Barretts stock housing design? How can we make architects/developers design new dwellings taking their architectural cues from the local and surrounding vernacular? How can local people have more of a say over this?
Low density housing	Statement broadly SUPPORTED	This varies between 18-34 dwellings per hectare. BUT with really effective design there could be less of a land grab.
Affordable Housing – builds of 10 or more units to provide 30% affordable housing	SUPPORTED	The parish council has concerns that developers may seek to reduce this on arguments of viability such as the Sturry development example CA17/01383/OUT which has 0% affordable housing.
Proposal to dispose of inner Canterbury car parks	CONCERN	The parish council understands this links to the proposed Canterbury Circulation Plan with the aim of reducing inner ring road congestion by people driving to inner car parks – however there are valid journeys and reasons for requiring short-term inner city parking, for example, for less physically-able people to visit their bank, dentist, optician etc. Relocation/Loss of car parking in the city centre will affect shops/businesses – these businesses will relocate elsewhere – which would be a negative impact for the whole City and its residents.

<p>The Canterbury Circulation and zoning plan</p>	<p>CONCERN</p>	<p>This is radical and aspirational. It may get tremendous adverse comment from the public and be politically undeliverable. It remains a notional design until the bypass roads are built – for which there are costing and funding concerns.          To work it is dependent on the expensive Eastern Movement Corridor (EMC) – costed at £163m – is this really deliverable?          The EMC needs its route precisely defined now.          Policy C26 Land North of the University has no strategic housing allocation yet, but could help to fund the Northern movement corridor?</p> <p>Without the complete bypass, other roads would take the strain.          Not everyone wants to use Park and Ride and park and ride is not always a solution for every need that people have to visit inner Canterbury.          To cycle or walk everywhere is not practical for everyone in order to achieve the needs for their journeys, for example, you cannot do a weekly food shop on a bike.</p> <p>Oxford Council is proposing to divide its city into six zones in which residents may use their cars as much as they like within their district and given free permits allowing them to drive to other districts on 100 days a year. If they exceed this limit they will be fined, possibly £70 a journey or a day. (Source The Sunday Times October 23, 2022). Could a scheme of this sort work better? The current proposed zoning models on Ghent which is a much larger city than Canterbury.</p>
<p>Lengthening of the Sturry train station platforms</p>	<p>SUGGESTION to ease traffic congestion on the A28</p>	<p>The level crossing at Sturry is closed for 17 minutes in every hour. The regular traffic congestion frequently backs up for over a mile from the crossing. The level crossing 'down time' is aggravated because the Sturry station platforms are too short. This causes any train of more than four carriages to experience "train overhang", and therefore prevents the raising of the barriers. The arrangement of the platforms is such that both up trains and down trains overlap the crossing.          This issue will only worsen due to the housing developments, planned or underway, for more than 2,500 homes at Sturry, Broad Oak and Hersden, and further afield at Herne and Greenhill.          Lengthening the platforms at Sturry offers immediate and long-lasting benefit to a great deal of residents and road users, not just in the local area but from the wider towns around. It would be better for the environment, climate change and air quality.</p> <p>The Part B – Schedules of the draft Infrastructure Delivery Plan (October 2022) has Ref IA22 and IA23 for improvements to Canterbury West Station:          - "lengthen and widen the platforms from 8 car to 12 car" IA22 and          - "A new turnback facility or a Bay platform at Canterbury West to reduce the down time of the crossing at St Dunstan's Crossing" IA23.          Both cite the funding mechanism as CIL and S106.</p>

		<p>The parish council would like to see inclusion of the lengthening of the Sturry station platforms with associated signalling, software, etc requirements included in both the Infrastructure Delivery Plan and as a priority on the CCC's Community Infrastructure Levy (CIL) infrastructure projects list to ensure that this has a programmed outcome for achievement.</p> <p>Would a cheaper alternative be to move the station westward (and lengthen the platform) so that both platforms are parallel to each other and reduce the barrier time?  Can we all, and Parliament, push for inclusion of improvements as part of the Network Rail objective of completing the East Kent Resignalling Scheme to include the proposed re-siting of signals in the vicinity of Sturry? If this could be combined with a change to the Selective Door Opening (SDO) arrangements, whereby passengers were enabled to board and alight from the rear 6 coaches only in both directions (as the newly located signals further along the route on the Up side would permit this), then the platform lengths could remain as they are and the level crossing would be clear of the rear stopping trains at all times.</p>
Draft Open Space Strategy 2022 and Open Space Assessment report 2022	SUPPORTED	<p>The Vision and the Aims in the draft Open Space Strategy (to protect, enhance, promote and secure open space and new provision) are supported by the parish council.  Both the percentage provision thresholds in new developments for each typology, and the reductions to the distance standard thresholds to travel are welcomed.  There is a concern that a developer could play 'the viability card' and seek to reduce open space/all typology requirements – although we recognise that CCC has set the bar high.</p> <p>The parish council fully supports and applauds that: Proposals for development for more than 300 homes will be required, for the total on site open space provision, to:</p> <ol style="list-style-type: none"> <li>Obtain the relevant designation (either Village Green, Fields in Trust or Local Nature Reserve designation) for the open space from the relevant body; and</li> <li>Transfer the freehold ownership of the open space to the council (or alternatively the Parish Council); and</li> <li>Establish an endowment fund to cover the on-going management and maintenance of the open space in perpetuity.</li> </ol>
Buses and Canterbury Bus Station capacity	GENERAL COMMENT	<p>Canterbury Bus station is at or nearing capacity. To support development across the district an improvement is necessary. It is noted that The Part B – Schedules of the draft Infrastructure Delivery Plan (October 2022) has Ref IA19 to increase its capacity. This is supported but unfortunately there is no indicative cost or timescale for delivery given.</p>
R26 – 440ha Broad Oak reservoir and Country Park	SUPPORTED	<p>Planning for sufficient fresh water supply is essential.</p>
S106 Agreements	GENERAL COMMENT	<p>Section 106 Agreements need to be robust and watertight to ensure that enforcement action may be taken for any non-compliance.  Parish council input before such agreements are finalised would be welcomed.</p>

<p><b>Retention of the green gap</b> between Sturry and Westbere</p>	<p>STRONGLY SUPPORTED</p>	<p><b>The Natural Environment and Open Spaces Topic Paper 2022.</b> Page 28: Point 3.5 and 3.6 – has retention of the Two Fields in the parish of Westbere as protected Green Gap – Westbere Parish Council welcomes and strongly supports this.</p>
<p><b>Proposed new green gap</b> between Hersden and Westbere</p>	<p>STRONGLY SUPPORTED</p>	<p><b>The Natural Environment and Open Spaces Topic Paper 2022.</b> Page 28: Point 3.7 and Figure C.13 – proposes a new Green Gap designation - Westbere Parish Council welcomes and strongly supports this, especially in light of housing development of circa 150 new homes proposed for the Bread and Cheese field (Policy R12) opposite. It is important to retain this proposed green gap field to protect the lower village of Westbere to prevent flooding, as there is such a steep slope down towards the existing homes, including important listed buildings, some without foundations, in Westbere Lane.</p>