



CCC Consultations <consultations@canterbury.gov.uk>

New Draft Local Plan to 2045 RESPONSE

2 messages

sandra drew [REDACTED]
To: consultations@canterbury.gov.uk

14 January 2023 at 11:42

I would first like to say that I have found this consultation incredibly difficult to engage in and it seems that it has been designed to inhibit consultation rather than encourage it. Before Christmas I filled in part of the response questionnaire, saved it and understood I could return to it and continue to completion. This has not been possible, after many hours of trying. So, on behalf of Castle Area Residents' Association I submit the following response.

RESPONSE TO DRAFT LOCAL PLAN

The draft local plan is based on a fundamentally false premise which makes it meaningless. The most controversial aspect of the plan relates to housing numbers and their location. This, in turn, drives the twin problems of traffic congestion and pollution. The 2020 consultation produced no single positive option but the 'least worst', on which this plan claims to be based, was the Canterbury Focused A (9,000 dwellings) showing 27.5% in favour and 32.9% against.

However, as this draft plan is actually for 13,000 dwellings, it is far closer to the Canterbury Focus B option which produced 8.6% in favour and 65.8% against. This was the most disliked choice with the 'Preferred Option' running it a close second. Thus this draft plan is exactly what residents do not want. The original consultation process made that quite clear. Unless this plan heeds the original consultation process, on which it purports to be based, then either the consultation is meaningless or the plan is wrong.

Consequently all the housing options are not what residents want and the whole basis of centring housing on Canterbury is the incorrect solution.

This in turn means Policies SS3-5 are based on a false premise and that Policies SS1 and 2 also need to be revised as a result of this.

Policies C1-C26 are also the obverse of what residents desired from the consultation process and need to be replaced.

To be valid, the plan needs wholesale reconsideration in the light of this. Answering a detailed questionnaire when the fundamentals are wrong is pretty meaningless, even if some of the environmental objectives are an improvement.

Consequently please note and record that we strongly disagree Policies SS1-5 and C1-26. This makes responses to W1-10, HB 1-10 and R1-28 pretty meaningless unless

Chapters 1 and 2 are addressed. We are generally supportive of Chapter 6. DS6 points 1, 5 and 6 need strengthening with the wording of 7 made more specific. DS7 point 3 needs detailing. We strongly disagree DS 26 which is totally compromised by C1-C26 above. DM1 must ensure this will not allow the conversion of metal or concrete hay barns, machinery stores or horse shelters to be converted into dwellings. DM8 and DM9 must address inappropriate lighting and advertising which has been allowed to proliferate. DM17 must address the conflict between making the town centres more residential and the late night economy.

The basic illogicality of the plan becomes apparent where it seeks solutions to the traffic and congestion issues which it actually worsens. The major traffic problem in the district is the A28 so called ring road through the city and the traffic problems on the feeder roads to the E, S and W of it. Putting the majority of new housing on the E, S and W approaches to the city can only make this problem worse.

The current Local Plan and this draft plan proposes some 20,000 new dwellings (roughly doubling Canterbury housing numbers) on this side of the city in a range of uncoordinated random housing estates which will be built by competing developers. This is not town planning and it is certainly not any way to plan new communities.

Policies C1-C26 propose a series of unconnected outer urban housing estates. All are too far to be within comfortable walking or cycling distance of the centre. They are also generally uphill. None are large enough to be truly self sustaining in terms of offering a range of shopping, entertainment, medical, sports, social, educational etc facilities within a 15 minute walk. Indeed, because the sites are developer led, they will actually compete with one another rather than build coherent communities as is apparent at some sites in the current local plan.

Consequently new residents will seek these facilities which are fundamental to their daily needs by travelling to the city centre. Bypasses and outer ring roads are irrelevant to their likely travel patterns which have simply not been modelled. The Transport Strategy does not consider anticipated journeys from these settlements to, say, Canterbury W station, K&C hospital, UKC, B&Q, city centre, theatre/cinemas, major supermarkets etc. All these destinations are likely to require car journeys.

The 4th A2 slip road at Wincheap has been deleted. It was a specific requirement to answer increased traffic from the 1150 houses being constructed at Thanington. The houses will now be built with no traffic mitigation. Thus traffic on the ring road and the A28 will radically worsen. The 'eastern movement corridor' (can we please call it a bypass or an outer ring road?) is unlikely to be built until 2040 or later. Apparently no allowance has been made in the costs for inflation and the £163m looks distinctly optimistic. The source of funds is not identified. If any one contributing site fails to come forward it will not be funded. Thus the houses will be built without the promised infrastructure which is exactly what will happen at Thanington. Many of the traffic measures are simply uncosted as 'TBA'. So the overall costs of £234m are not realistic.

This is exactly what happened with the cost estimates for transport improvements in the current local plan. Finally. the northern bypass element is simply unstated.

The proposed 'solution' of zones actually drives existing communities apart by effectively creating ghettos in the name of suburban expansion on the E, S and W approaches to the city. Longer car journeys will be required, thus adding to traffic and pollution, further exacerbating the very problem it seeks to solve.

Given the fundamentally flawed logic of the plan any detailed response to 146 pages of questions is rather meaningless as the plan itself is patently not what residents have asked for in the first place.

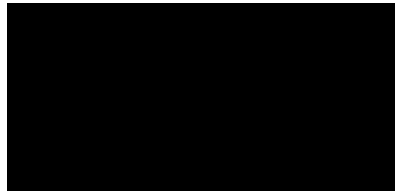
The sustainability appraisal is difficult to locate, erroneous, and in parts meaningless. The call for sites is reactive rather than proactive and is not a plan for creating a truly sustainable community. It is an extension of the 2017 local plan process which is now recognised as flawed and this plan merely perpetrates that problem.

The Habitat Regulation Assessment is very difficult to locate but must include the protection of the Hambrook Marshes and the sites behind the Wincheap estate which form part of the riverside wildlife corridor.

Finally, this consultation questionnaire is of unreasonable length for most people to complete. It is difficult to locate, together with its associated documents. You cannot review it prior to starting to complete it. It is not accessible to those unfamiliar with IT. It needs constant cross referencing from various documents back to the questionnaire effectively requiring 2 or even 3 computer screens. But above all, as stated above, it is based on the fundamental flaw of not being what residents, when originally consulted, asked for in the first place.

SANDRA DREW on behalf of CASTLE AREA RESIDENTS ASSOCIATION CARA

Sandra Drew MBE



CCC Consultations <consultations@canterbury.gov.uk>

14 January 2023 at 14:36

To: sandra drew [REDACTED]

Good afternoon Ms Drew,

Thank you very much for your email. I will ensure your comments are reported and considered as part of the consultation process. I apologise that you have struggled to navigate through our consultation survey. I can appreciate the length of the questionnaire, however, we did our utmost to make this as user-friendly as possible. I shall take your comments on board and hope this email provides some assurance that your views will be taken into account.

All the feedback we receive will be carefully analysed and reported to councillors who will decide what changes should be

made to the draft Local Plan.

Later in 2023, we will publish the final draft Local Plan and you will be able to make further comments before the plan is submitted to be examined by the planning inspector.

Have a lovely weekend!

Warm regards,

Victoria Asimaki

Principal Policy Officer (Engagement)

Canterbury City Council

[Quoted text hidden]