

Thanington Parish Council Response to DRAFT LOCAL PLAN



THANINGTON PARISH COUNCIL

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Thank you for the opportunity to respond to the CANTERBURY DRAFT LOCAL PLAN. We have studied the significant amount of information supplied and also the consultation responses and the response to those in the DRAFT LOCAL PLAN.

We have also reviewed it against the **THANINGTON NEIGHBOURHOOD PLAN**, which is currently moving through the accreditation process. This is attached along this submission

In **summary** we have looked at the following key questions:

1. Is it deliverable? ANSWER: NO

The history of the CANTERBURY LOCAL PLAN is that the current plan did not deliver its objectives. This DRAFT PLAN has similar but even greater issues on delivery. The delivery will be developer lead and dependant on outside priorities. The local Authority does not have the means or resource to manage such a plan or the powers to control it. The objectives of the DRAFT PLAN are not deliverable in a number of ways, a major one being a lack of detail and scrutiny on the proposals for practical delivery. It will not be delivered successfully if it does not have the backing and agreement of the Local Community. That is certainly the case for Thanington. Developers are the primary drivers on this, and Canterbury has no real control on that.

2. Is it sustainable? ANSWER :NO

The definition of sustainable development in the NPPF is ***“development that meets the needs of the present without compromising the ability of existing communities and future generations to meet their own needs.”*** The DRAFT LOCAL PLAN, does not do that for Thanington. The proposals will have major implications for quality of life, and damage community structure in the future. It will also lead to a period of 20 years plus of disruption caused by almost continual construction, which will affect Thanington residents in particular.

3. Is it what people want? ANSWER: NO

For the Thanington area, it is not what the community wants. Comparing the DRAFT LOCAL PLAN, and the THANINGTON NEIGHBOURHOOD PLAN, that fact can be clearly seen. There are some apparent good points in the DRAFT PLAN but they cannot be taken out of context with the larger and wider damaging implications for Thanington. There is also a major concern by the community in the proposals actually being delivered.

Overall the DRAFT LOCAL PLAN is a deeply flawed piece of strategic planning

Thanington Parish Council Response to DRAFT LOCAL PLAN

THE THANINGTON NEIGHBOURHOOD PLAN:

Attached is the latest draft of the Thanington Neighbourhood Plan (TNP) for reference. It contains a clear vision of what the residents of THANINGTON wish for. The results of our consultation are in the APPENDIX section of the TNP.

- The local community were consulted first , ensuring we focused on their concerns wishes and ideas ,before drafting the TNP.
- They were then consulted on the DRAFT of the TNP, to ensure we interpreted their views correctly for the district. In both cases the consultations were taken into account.
- The outcome of these consultations is in the APPENDIX section of the TNP and we would draw your attention to its results. In summary the proposals of the DRAFT LOCAL PLAN are TOTALLY opposite to the community's wishes.

GENERAL COMMENTS:

- As regards the general proposals for the Thanington area. The DRAFT LOCAL PLAN is **TOTALLY** at odds with the proposals in the THANINGTON NEIGHBOURHOOD PLAN.
- The DRAFT LOCAL PLAN proposals will severely over develop Thanington, totally remove virtually all of the remaining agricultural productive land in the Parish, provide no infrastructure of any deliverable practical inclusion, have major impact on the area due to increased RAT running, which has not been considered, and show a total lack of detail & understanding of how the proposals can be delivered.
- The impact of the proposals would be that the mixed area makeup of Thanngton would be lost and changed forever. It is **NOT** what the local community and residents wish. It also appears to be very much against the latest proposals from Michael Gove, Levelling up Minister, relating to the planning strategy changes from Central Government .
- It has been developed with a total lack of detail of the deliverability of the proposals, and management of them. Being totally housing number lead, and reverse engineered to that goal. This was clearly evident in the presentations given by Council Officers and also in how the plan proposes to change people's thinking.
- Thanington will have effectively doubled the dwelling numbers with **current** developments, and what is proposed in Thanington, will effectively **triple** these. When the impact of the C6 MERTON PARK site is considered, there will be even greater in impact on Thanington.
- The current development has failed to deliver the promised infrastructure. This was a big factor in their consideration and grant for development. Examples here are the increasing probability of the non-delivery of the 4th SLIP ROAD off the A2 (HIGHWAYS ENGLAND & THE DEVELOPERS concedes this is the probable outcome). The WINCHEAP GYRATORY SYSTEM is flawed from a large number of aspects, and will not deliver the benefits promised .If it happens, it will also be against Local Public opinion. Caused in part, by a lack of upfront detail on proposals and requirements. A fundamental planning mistake.
- Consideration of growth (e. g Traffic) has not been sufficiently considered. Population & housing bring other issues .They need to be addressed, not just ignored in the hope they will disappear. This has not happened. The problem also being all too evident in the current local plan.

Thanington Parish Council Response to DRAFT LOCAL PLAN

- The proposals are not central government lead, but clearly Canterbury Council lead, and are primarily housing number driven. This is being to provide the infrastructure. There is no overall budget costing for ALL for what has to be provided. This is a fundamental requirement in the early stage of developing any plan, to ensure any plan is achievable.
- Canterbury has a congestion problem, but adding to that with 30000 new dwellings (between the current plan and this proposal), will not alleviate the problem, only make it bigger. This has not been addressed.
- No basic delivery timescale schedule in the plan. There seems to be an acceptance of lack of control over delivery. Again a fundamental part of any plan.
- The argument that there are some good points in the DRAFT PLAN is partially valid. Though when looked at in the overall context of the proposals, these good points are more than countered by the issues that they impose. Which are not adequately mitigated for.
- The environmental arguments in the DRAFT PLAN do not show or mitigate for the environmental impact the proposals will have on the overall Thanington area.
- There is a complete lack of understanding by officers of the issues or the feelings of local residents, which was clearly evident in the presentations. Also in the response to the vision consultation. Local knowledge and opinion should be embraced not ignored.
- The proposal on traffic measures is deeply flawed in that it has some fundamental mistakes and omissions. The comparison with Ghent is not at all valid with one simple example being there is NO RING ROAD PROPOSED for Canterbury.
- The other issue is the total lack of detail and therefore understanding as to how the proposal will be costed, funded then implemented. The public response to this could be described as unsympathetic.
- The DRAFT PLAN breaks all the basic rules on good strategic planning which will lead to failure. The current local plan is an existing example which lessons appear to have been ignored

CONSULTATION:

- Canterbury consulted on the DRAFT vision for the plan, and received a number (though VERY limited in number) of responses. There has been concern over the process and the methodology used and its complexity. To the point where people are reluctant to use the process at all. Also question if their views will even be taken into account, based on the vision consultation process.
- Without that that involvement it becomes a meaningless and very flawed exercise
- The views of the consultation were not taken into account in the DRAFT PLAN. The general options and policies in the DRAFT PLAN have the highest level of disagreement by respondents to the vision consultation.
- The question being asked is basically is, what is the reason for the consultation if the obvious views of the community are not considered and imbedded in the DRAFT PLAN?
- The total lack of face to face consultation for Thanington and the surrounding area is an issue. This area is most affected by the proposals and yet no local consultation was held for residents.
- Argument has to be won over by consensus to then be successful. The whole approach by Canterbury in this plan does not do that. The interpretations used are not community lead.

Thanington Parish Council Response to DRAFT LOCAL PLAN

COMMENTS ON PROPOSAL SITES

- The sites concerned that affect Thanington are, C6, C7, C8,C9, C10, for which the proposals show an estimated **2941 additional dwellings** . Thanington currently has approx. **1100 dwellings** This would mean a **quadrupling** of the dwellings in Thanington which is against what the community wishes and will have a major adverse On the area.
- The delivery of these sites could mean **25 years plus** of construction work and all the issues that brings, for the area and its local people. Which they already experiencing. Sustainable not as per the definition?
- There are many promised measures with these proposals, but with the history of current development promises in Thanington, they do not material. Are they feasible when detailed will they actually be delivered? That needs detail confirmation of delivery as they are a priority for the plan.
- There is no cost estimate for the provision of these. It needs to be evaluated to see if these are feasible and practical to be delivered by developers, rather than based on the vague promises and developer lead reports/evidence
- The general layout of the sites means that **90%** of the Thanington area high grade agricultural land will be developed. The vague statements on environment protection do not make up for this loss of this productive land and natural habitat. Despite what is stated
- This land has become increasingly used for leisure and appreciated, since the pandemic and the proposals do not make up for this. It will be a significant loss in a all ways
- There are major issues with the infrastructure proposed. C10 deals with SW LINK ROAD, and is seriously flawed on this proposal. Hollow Lane is not suitable for increased traffic and the proposed modifications have major issues if looked into. The western exit is into Cockering Road. Again another totally unsuitable road. The current development sites have not yet been implemented and the concerns on traffic impact have not been resolved .The issues with developer lead traffic assessment accuracy , prediction in on traffic growth, car ownership and the predicted increased requirement for parking space, the additional traffic is not assessed.
- Site C7 was not part of the current Local plan as stated in its assessment. S11 for 1150 homes specifically **excluded** this area for very clear and still valid reasons. 1150 homes were granted for the current S11 site and its current boundaries under the current plan. Satisfying the requirements of S11. So that assessment is incorrect and misleading
- The issue of RAT running is also ignored. There is already a significant increase in that on the local lanes and rural roads in and around Thanington. Being caused mainly by the issues on the A28. Houses bring people and cars, and these proposals would put an estimated 4500 car journeys/day into the area, using the data and predictions reported for this. There is no mitigation for this, just the assumption, (which has proven wrong in the current plan) that modal shift will resolve it. With the increase in dwellings proposed, and also the existing traffic situation, there is no meaningful mitigation. Which would need to be far more significant than is indicated if it is to be resolved
- The use of Homersham as an access to the A28 is questionable due to the on road parking. The situation at the A28 junction being that it can take 3 changes of traffic light sequence to clear Homersham. Increasing traffic on HOMERSHAM is not viable, and not assessed and proved.

Thanington Parish Council Response to DRAFT LOCAL PLAN

- The SW LINK road will just add to the problems on the A28, and also contribute to RAT RUNNING, which again is not assessed. It does not deal with the traffic from the proposed developments which is also not adequately assessed.
- There are no major infrastructure improvements to ease the A28 situation. The 4th slip road non delivery and the design of the Wincheap gyratory system is been mentioned above are still an issue under the current plan. The problem being these was that there was no practical detail provided for accurate assessment and costing . A mistake that is being made again in the DRAFT LOCAL PLAN and continues with the current plan. That lesson has not been learned.
- The sites C7 and C8 effectively will mean that LARKEY VALLEY WOODS will be surrounded by development and the impact on an SSSI site by this cannot be underestimated. Their access and sufficient detail is not provided to allow for this. They will also load the A28 of which there is still concerns over the impact of the current developments. That must be answered with certainty before any further volume can be determined as viable.
- The current Junction on the A28/A2 complex is already struggling at peak times due the number and complexity of the traffic light changes . There is currently no impact on this from the current development, just the predicted increase in traffic since 2017. It is understandable as the Junction s already at capacity. The Wincheap gyratory proposal, will not help that situation. Its Traffic assessment data has obvious flaws, one being that to achieve the predictions, the speed limit will have to be broken at peak times?. These proposals will just make that situation worse for both traffic and air quality and this has not been assessed accurately
- There is no detail on how the utilities supply for these will be achieved for these proposals. This is particularly the case on water and waste water treatment. There are well known issues with pollution water supply and water treatment capacity. For the existing sites this has not been resolved and needs monitored on delivery of these. Then further demand needs ensuring it can be met. The proposed reservoir, should it ever materialise, realistically will not be delivered until 2040 (based on the local water authority estimate) Additional treatment capacity estimated to be in place before 2035. That leaves questions on if the proposals can be serviced and how? Again no assessment or detail
- The proposal in the Thanington area alone will need an estimated 1.2 million Litres per day of fresh water, and then also the corresponding treatment capacity to deal with sewage. When and how will that be delivered has not been detailed. Again the issue of no assessment detail or mitigating measures
- The proposals are very much old style thinking. Also there is no overall assessment of the larger impact on surrounding areas. Purely focusing on the sites themselves and housing number driven and building non self-sustaining development, which still relies on the major existing centres, which need to be accessed in all probability by car. They being too far out to allow make other forms of transport viable. A total lack of innovative and lateral thinking.
- Sites C7 and C8 will impact significantly on the A28 COCKERING ROAD STRANGERS LANE AND ST NICOLAS ROAD. The current situation on the A28 is problematical, and one of the most congested routes into Canterbury, as has been acknowledged in the proposals. The impact of these sites in that area has not been assessed accurately.

Thanington Parish Council Response to DRAFT LOCAL PLAN

TRAFFIC TOPIC:

This has focused on a proposal to divide the city up into discrete zones with the apparent? needed infrastructure to support that strategy.

- The principle relies on a so called outer ring road giving access to each zone from this ring road. Access to each zone directly from and joining zone being prohibited.
- It is an idea that has in no way been thought through, or given anything like the diligence required before it has been proposed
- There is NO RING ROAD in the proposals in any shape or form. The NW Zone, St Dunstons/St Stephens having no part of any potential ring road. The implication being that the local roads will be used? That is a totally non -viable option as a cursory study of the roads will reveal. So as the ring road is key and there is none how will it work.? Again lack of essential detail to ensure an idea is viable in the proposals.
- There is no detail on how the zones will be policed apart from STOPPERS and FILTERS. Has it been looked into as to how much is the full cost is involved in doing this? The details given are totally lacking on this. A local check on what would be required to provide a workable system including the IT infrastructure and support does not appear to have been given any diligence and too much is missing for it to be put forward as viable and deliverable.
- Without a proper RING ROAD, as is in place in GHENT, which is held up as the example for this the scheme is meaningless and cannot be considered.
- A closer look at GHENT shows a significant number of differences to what is being proposed. These have not been assessed at all and their implication on the scheme ignored. So to state the transport strategy is based on other European cities success is false, as Canterbury's strategy has no comparison to those.
- Other cities that are quoted as apparent examples and examples. They had a long term plan in place for anything up to 20 years. Canterbury has been totally lax in this, and what is proposed is not the complete solution it is said to be, as it does not cover the required elements.
- The figures given for predicted traffic flows are definitely suspect. The number of vehicles will not reduce in the next 10 years as predictions on car numbers and car ownership clearly show. 30000 dwellings could mean an additional 45000 VEHICLE movements per day from the data available in various reports.
- There is no cost estimate for the proposal. The Eastern Bypass route is not clearly defined and therefore confirmed as viable. The idea is that the housing numbers will pay for this via what is basically a developer levy. The vague figures given by Canterbury for the costs are, even at today's prices and examples, grossly under estimated. A basic cost review including all the additional works, not just looking at the Eastern Bypass, could well be in the region of £500million. That is not feasible to fund from a levy of max 17000 houses. So how will it be funded? .Basically because of that omission the probability is that this proposal will never be delivered, which is a well proven history in Canterbury.
- The argument that this is all in the future is also a flawed one. How will this be delivered? Apparently in phases? At a proposed build rate of 1200 homes per year and an existing problem that is an important factor that should have been detailed in the plan and planning process. The issue is not for the future there is a problem now which needs dealing with and

Thanington Parish Council Response to DRAFT LOCAL PLAN

proposing to add in total nearly 30000 DWELLINGS to Canterbury will give an issue in size that is nowhere near contemplated in the proposal

- The reliance on predicted Traffic assessment in this proposal is also flawed. To many times with development it is seen that the assessments are totally wrong and the data used incorrect being out of date or badly interpreted. Looking at the assessment, with just a local knowledge and a common sense approach, leads to serious question on its reliability..
- The majority of the development is in South Canterbury. Yet there is no significant meaningful mitigation for this in the area. The new A2 Junction and SW link road will cause other problems if it is indeed delivered. Again just refer to history.
- The cost of running the traffic scheme has not been evaluated. Including administer it and maintain it, as this has a cost. If Canterbury cannot afford to run a Park and Ride system how will this be continue to be financed? When This is linked to the removal of city car parks, that currently contribute significantly to its finances. Is it hoped that sufficient financial income will be provided from the penalties of abusing the zoning definitions?
- Taking individual life style journeys and comparing them to what would happen with the proposal. The additional travel time to make routine journeys to say, the GP surgeries, will involve significant additional mileage cost and capacity on the proposed SO CALLED ring road and existing main truck routes. To say that can be done by other means is absolutely showing a lack of reasoned understanding of people's lives.
- The argument that there will be provision for public transport etc. and people will walk or cycle is again flawed. The age demographic of this country means that the average age of the population is increasing. So relying on cycling and walking is not a good bench mark. At night in the winter? Ok when you are young not viable when you are old
- Public transport requires funding, as is clear at the moment. It also need to be financially viable for the operators. Otherwise routes are discontinued. Where is this issue addressed here? How will it be funded and how will it financially support the scheme 24/7
- If you are going to say that there will be public access, and provisions will be provided to access the city centre. How is to be achieved, will it run 24/7? The night time economy will have some comment on that. Has the MARLOWE THEATRE and its patronage been considered as one example?
- Almost universally by local reactions to this, there is universal opposition to it. It has been put together apparently over 2 years without any consultation and is a very poor outcome for those 2 years of expense and effort.
- The general effect on business for Canterbury has not really been investigated. People and access to the city is one of the main drivers of the economy and this proposal will impact on that significantly. People will not visit CANTERBURY and support its economy with what is proposed as the access will be too troublesome, complex, inconvenient, and probably expensive .

Submitted on Behalf Of Thanington Parish Council

January 2023