

Seconding of the Response from St Michael's Road Area Residents' Association

By

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CCC Local Plan 2022-2045 consultation

Response from St Michael's Road Area Residents' Association

Policy SS1: Environmental Strategy for the district

1. Provision is made for a range of new open spaces and sports and recreation facilities including two new country parks for the district: (i) Broad Oak Reservoir Country Park; (ii) Womenswold Country Park.
2. The network of green and blue infrastructure - including rivers, streams and ponds - in the district, which provides important habitats, valued landscapes and spaces for recreation and which supports our health and wellbeing, will be protected, maintained and enhanced.
3. The Council will work with its partners to support and sustain the full recovery of the Stodmarsh Nature Reserve designated site and to meet its targets for water quality and improve biodiversity.
4. Development across the district will need to incorporate measures to deliver a minimum 20% biodiversity net gain.
5. New developments of 300 homes or more should incorporate a minimum of 20% tree cover across the site and all developments should incorporate new trees and hedgerows to screen noise and pollution, help mitigate climate change and contribute to floodplain management.
6. Opportunities for carbon sequestration and for the development of renewable and low-carbon sources of energy will be actively supported within all developments. Large scale carbon sequestration and renewable power generation will be encouraged in suitable locations.
7. The council will continue to work with partners to explore the promotion of a Stour Valley Regional Park and to support the extension and improved connectivity of the Blean Woodland Complex.

SS1a To what extent do you agree or disagree with the proposed approach set out in this policy?

Strongly agree/Tend to agree/Neither agree nor disagree/Tend to disagree/Strongly disagree/Don't know

Strongly agree

SS1b What changes do you think should be made and why?

We welcome the commitment to protect and enhance open spaces and the natural environment. We urge that open spaces on the University of Kent estate, and in particular the Southern Slopes, should be added to the open spaces identified for protection in the Open Spaces Strategy. The Southern Slopes are the most important area of semi-natural green space accessible to our neighbourhood. In 2011 local residents submitted an application to KCC for the western part of the Southern Slopes to be registered as a Village Green. The application was considered at a Public Inquiry in 2015, and the Inspector found that this area of woodland and grassland had been extensively used by local people "for a wide range of lawful sports and pastimes" for a long period. She described it as "the only large area of inviting open space commanding views of the city and cathedral available for informal recreational use" by residents of the area. The Village Green application was unsuccessful because the Inspector decided that access to all the University's land including the Southern Slopes had been 'by permission'. The land therefore qualifies as 'Publicly Accessible Open Space' and we submit that it should be protected in accordance with the Open Spaces Strategy.

Policy SS3 – Development strategy for the district

1. Between 2020 and 2045 provision is made through the granting of planning permission and the allocation of sites for:
 - a. An average of 1,252 new dwellings per year, including affordable housing, older persons housing, a range of sizes and types of housing to meet local needs and 26 pitches for gypsy and traveller accommodation;
 - b. Floorspace will also be allocated for office, light industrial, general industrial, warehousing, convenience retail and comparison retail use.
2. Canterbury urban area will be the principal focus for development in the district. New development will be supported on suitable sites within the urban area. Canterbury city centre will continue to be the primary commercial, leisure and tourism centre in the district, complemented by the edge-of-centre commercial areas at Wincheap and Sturry Road, with university-related development focused within campus boundaries.
3. Whitstable urban area and Herne Bay urban area will be the secondary focus for development in the district. New development will include delivery of two new coastal secondary schools at Whitstable and Herne Bay.
4. A new Garden Community location is identified at Cooting Farm, Adisham Road which will provide new homes, jobs, services and infrastructure.
3. A hierarchy of rural service centres, local service centres, villages and hamlets establishes the role and function of settlements across the district.

**SS3a To what extent do you agree or disagree with the proposed approach set out in this policy?
Strongly agree/Tend to agree/Neither agree nor disagree/Tend to disagree/Strongly disagree/Don't know**

Strongly disagree.

SS3b What changes do you think should be made and why?

The proposed target of 1252 new dwellings per year is much higher than the estimate of need provided in the professional advice made available to the Council. The excessive number of houses, focused on the Canterbury urban area, will add to traffic congestion, and will involve unnecessary loss of valuable green space. Development should be matched to local need, with an emphasis on genuinely affordable housing including social housing.

Policy SS4 – Movement and transportation strategy for the district

1. Working with partners, including Kent County Council, the council will deliver a comprehensive programme of sustainable transport infrastructure measures to improve neighbourhoods, accommodate new growth and to facilitate a significant shift to low carbon and active travel journeys, particularly for short trips.

2. A new **Canterbury Circulation Plan (CCP)** will enable the reallocation of road space on the inner ring road for active travel journeys and faster, more reliable public transport to remove congestion, improve air quality and enhance the city centre environment and its heritage. Key infrastructure requirements of the CCP include:

- (a) The relocation of key city centre car parking to locations outside of the inner ring road;
- (b) The delivery of a comprehensive city-wide network of segregated cycle lanes and cycle parking infrastructure, with links to the coast and rural areas;
- (c) Enhanced public realm and pedestrian environment on key routes and within the city centre;
- (d) Improved public transport connectivity across the city, with bus priority measures and enhanced park and ride infrastructure, and upgrades at Canterbury West and Canterbury East rail stations;
- (e) Delivery of “shared streets” within existing neighbourhoods to improve neighbourhood environments and support active travel journeys;
- (f) Implementation of an ANPR-based sectoring system and modal filters to limit cross-city trips;
- (g) The delivery of enhanced road infrastructure to improve connectivity, facilitate alternative access points to the city, and enable the delivery of the measures at a-f including:
 - (i) upgrades at the A2 junction at Harbledown and at Rough Common Road;
 - (ii) new A2 access to the Kent and Canterbury Hospital and links to the A28 at Thanington;
 - (iii) a new movement corridor to connect the A28 at Sturry with the A2 at Bridge.

**SS4a To what extent do you agree or disagree with the proposed approach set out in this policy?
Strongly agree/Tend to agree/Neither agree nor disagree/Tend to disagree/Strongly disagree/Don't know**

Strongly disagree

SS4b What changes do you think should be made and why?

We agree with the objective of a significant shift to low carbon and active travel journeys, and we support greatly improved provision for pedestrians, cyclists and public transport. However, even a significant shift from car use to other forms of transport would still leave many journeys having to be made by car, and the proposed ‘sectoring system’, dividing the city into zones and restricting car travel between zones, would create major difficulties and significant hardship for local residents,

including elderly people, families with young children, and people who are ill and need to visit a medical practice. Our members have pointed out that as our zone would not include any of the major supermarkets, they would have to drive for miles to do a weekly shop. The proposed new road infrastructure needed to facilitate the zoning system, incorporating a major new outer ring road, would add greatly to journey times, resulting in increased car use overall and increased pollution, and would involve the loss of valuable farmland and other green space. Building new roads itself generates a lot of carbon, and usually leads to more traffic. We have discussed the proposal with our members at our AGM in November and by email, they are without exception opposed to it, and have used words such as 'ludicrous' and 'crazy' to express their feelings about it. We urge consideration of alternative ways to achieve the objectives of reducing congestion and promoting alternative forms of travel.

We note also the lack of any reference to time-scales for implementation of the transport strategy. Apparently the new roads would be likely to take at least ten years to be operational, so it would take a long time for any possible benefit to be felt. It would be useful to see a phasing plan, which could explore what can be done in the next few years to reduce congestion without depending on new road building.

Other comments

To enhance the pedestrian environment in the city centre in accordance with 2(c), effective policing of the restrictions on use of e-scooters and cycling is essential. It would be easier to prevent illegal cycling in pedestrianised areas if there were good continuous dedicated cycle routes across the city. Provision for bikes in Canterbury is at present woefully inadequate, and our members have commented on the fact that cycling is too risky for them to allow their children to cycle to school.

Policy C1 Canterbury City Centre strategy

1. The council will work with its partners to revitalise the city centre through sensitive mixed-use regeneration, sustainable transport improvements, green infrastructure connections, and cultural and public realm enhancements. 2. Within the designated primary shopping area, as defined on the policies map, existing commercial provision at ground floor will be protected and new commercial development will be supported, to help maintain the sub-regional status of Canterbury as a shopping destination.

3. Outside of the primary shopping area, but within the city centre boundary, as defined on the policies map, mixed use development which incorporates main town centre uses will be supported

where this accords with other policies within this plan.

4. Residential and office development at first-floor level or above will be supported on appropriate sites, where this would be consistent with the surrounding character and street scene. Residential proposals should be carefully located and designed to avoid conflict with existing uses, particularly those that serve the night time economy.

11. The implementation of the Canterbury Circulation Plan will remove the majority of vehicular traffic from the City Centre, improving the environment for residents, businesses and visitors, providing a comprehensive and attractive network of walking, cycling and public transport connections, and facilitating a series of regeneration opportunities within the city.

Tend to agree

We support residential provision in former retail units as proposed in paragraph 4

Change paragraph 11 to: Measures will be introduced to reduce vehicular traffic in the City Centre, improving.... etc

Policy C26 - Land north of University of Kent

The University of Kent has significant landholdings to the north of its campus, and has ambitions to develop a new garden community in this location. The council will continue to work with the University, key stakeholders and the local communities to explore opportunities for sensitive development in this area to support development needs over the longer term, including how the area could help to facilitate a northern movement corridor to complete the outer ring of the Canterbury Circulation Plan.

**C26a To what extent do you agree or disagree with the proposed approach set out in this policy?
Strongly agree/Tend to agree/Neither agree nor disagree/Tend to disagree/Strongly disagree/Don't know**

Strongly disagree.

C26b What changes do you think should be made and why?

Although there is currently no specific proposal for development on land to the north of the University campus, we gather that a new proposal may be submitted. If it is submitted before the Local Plan is finalised, we are anxious that any such proposal should be fully consulted on before any decision is made on whether to include it in the final version of the Plan. This is an environmentally sensitive area and we find it difficult to see how any housing development there could avoid being environmentally destructive. Likewise any proposal for a new road constituting a 'northern movement corridor' would have major impacts on wildlife, and on the quality of life on the north side of the city. Wildlife corridors and the relationship with the woodland would be disrupted and the setting of Blean Church, for instance, with its sense of tranquillity enhanced by the skylarks, would be lost.

We are also sceptical about whether there is any viable route for a 'northern movement corridor'. It would either go between Blean and Tyler Hill, where it would bring a lot more traffic into Canterbury via St Stephen's Hill, or it would have to continue to Broad Oak to link up with the proposed eastern by-pass, in which case it would have to go through the proposed Broad Oak Reservoir Country Park.

We ask for this policy to be deleted.

Policy DM3 – Housing in multiple occupation (HMOs)

1. In order to maintain an appropriate area demographic, housing mix and to safeguard the character of local communities, the proportion of HMOs within the areas subject to Article 4 Directions should not exceed 10% of the total number of dwellings within a 100m radius of any application property.
2. Where the proportion of HMO's exceed this requirement the council will not permit:
 - (a) Change of use to a HMO(s); or
 - (b) A new build HMO(s); or

(c) Extensions to existing HMO(s) which would create additional bedrooms. However, in areas where there is already an exceptionally high proportion of HMOs for example, in any particular block of properties – consideration will be given to permitting further conversions, extensions and new build HMOs.

3. In all cases, regard will also be had to the following factors:

- (a) Whether the proposals would lead to a level of car-parking that would exceed the capacity of the street;
- (b) Whether the proposals could provide acceptable arrangements for bin storage and other shared facilities; and
- (c) Whether the design of any extension would be appropriate in terms of the property itself or the character of the area.

Strongly agree.

Comments

We strongly support the retention of this existing policy. As a residents' association we worked actively for the introduction of the policy at a time when concentrations of HMOs were expanding rapidly and having a detrimental effect on neighbourhoods such as our own. The policy has worked well and been effective in maintaining balanced communities. We would be very strongly opposed to any dilution of the policy.