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Canterbury and District Local Plan 2045

1 message

Lewis Phillips

15 January 2023 at 18:04

To: "consultations@canterbury.gov.uk" <consultations@canterbury.gov.uk>

Good afternoon

I write to comment on the proposed Canterbury and District Local Plan 2045.

Transport and proposed zoning of Canterbury

I refer to the Transport Topic Paper (October 2022)

1. I consider the proposal for discrete neighbourhood areas to be deeply flawed. The comparison between Canterbury (area 23 km²) with the city of Ghent (area 156 km²) is a false analogy. Zones in Ghent are self-contained with schools, healthcare facilities and transport. In contrast, several of the proposed zones in Canterbury will lack all of these facilities. To travel by car from Sturry/Fordwich to Canterbury West railway station (for example, to meet the high speed train from London which does not stop at Sturry) will involve a lengthy journey round the proposed Eastern Movement corridor, north along the A2 and back from Rough Common to the St Stephens and St Dunstons zone to reach the station. The journey will be many times longer than the current journey, creating additional pollution (to the extent vehicles are not electric and powered by electricity generated from renewable sources). Similarly, journeys from Sturry/Fordwich to the K&C Hospital will be many times longer – and with the current problems with the ambulance service, the public is being encouraged to make such journeys by private transport.
2. The Transport Topic Paper glibly refers to the need for “a new approach” ... “to ensure convenient bus routes are available for people to conveniently travel across the city.” There is nothing in the paper to indicate how this is to be achieved. I believe the biggest obstacle to people using buses in preference to private cars is the high cost of fares, yet the plan makes no reference to how affordable fares are to be provided, nor to what incentives will be given to bus operators to provide the “convenient bus routes”. Without any indication of how these are to be achieved, this is merely wishful thinking on the part of Canterbury City Council.
3. Canterbury City Council appears not to have given consideration to the use of a Congestion Charge Zone and/or Ultra-Low Emissions Zone to mitigate private car usage and pollution in the city centre, as has been successfully introduced in other towns and cities.

Eastern Movement Corridor/By-pass in the vicinity of Fordwich

1. **Damage to the environs of Fordwich** – The eastern route as proposed passes close to the historic ancient town of Fordwich, through much of the Fordwich Conservation Area. The consequent volume of traffic envisaged will generate considerable light, air and noise pollution with a severely detrimental impact on local residents, particularly at the southern end of the town.
2. **Disruption to National Cycle Route 1** – The proposed eastern route cuts the civil parish of Fordwich in two as it crosses Well Lane (an ancient sunken lane and historic drove road) and Moat Lane. Both these roads are on the National Cycle Route 1. All of the proposed routes for the Eastern Movement Corridor cross NCR 1 immediately to the south of the River Great Stour as the proposed road approaches the A28. The Canterbury Eastern Bypass Preliminary Feasibility Study October 2021 prepared by Santec UK Ltd (the “Santec report”) and the Transport Topic

Paper indicate that Well Lane and Moat Lane will be severed and the southern section of both roads closed. The Transport Topic Paper indicates on p14 that modal filters will be provided at these locations. It appears that cyclists travelling south on NCR 1 towards Sandwich will have to join a shared footway/cycleway alongside a busy highway to re-join the Stodmarsh Road. It is not clear how cyclists travelling towards Fordwich will safely cross the oncoming traffic to turn into Moat Lane. This is absurd, and in contradiction to the stated objective on p10 of the Transport Topic Paper of providing safe cycle routes and making it "possible to cross and move along the existing ring road in safety". We can substitute "Eastern Movement Corridor" for "ring road" and the statement is equally applicable.

3. **Flood risk** – The northern end of the three proposed routes cross a flood plain (flood zone 3) on the approach to the junction with the A28. Despite proposed mitigations, the extensive construction works and the footprint of a 7.3m wide road will exacerbate the already high flood risk in this area.

4. **Ecology and environmental considerations** – The Santec report addresses the concern about the original route passing through, or close to, a site of special scientific interest but ignores the ecology and environmental considerations for the proposed eastern route in the vicinity of Fordwich which crosses Grade 1 agricultural land, passes through the historic Trenley Woods, the presence of protected Great Crested Newts in the field north of Stodmarsh Road, and numerous important archaeological sites. A detailed survey will be required which will add cost and time delay in the event significant artefacts are discovered.

5. **Cost estimates are woefully low** – The Budget Cost Estimate quoted in the Santec report is totally unrealistic. Santec says its estimates for the eastern and western options are based on pro-rata extrapolation from the cost estimates for the original routing, now discounted. But there is no apparent allowance for the significant differences in topography of these routes and the probable need for extensive and uncosted engineering works for the eastern route. The chosen eastern route is three times longer than the western route and therefore much more expensive. The estimates are based on 2021 and earlier prices and take no account of inflation, currently over 10% annually. Since the Santec report was produced, it is understood the price of aggregate has doubled. The estimates exclude the cost of reinforcement and/or diversion of services running beneath existing roads – who is to pay for these? The cost estimates exclude any allowance for the diversion of numerous footpaths and cycleways and the provision of over/underpasses for the safety of pedestrians and cyclists. They also exclude the cost of ecology and archaeology surveys along the route.

6. **Financing** – To generate the Infrastructure Levy, the proposals are predicated on the construction – and sale – of some 17,000 homes, which will evolve into a massive urban sprawl on the edges of Canterbury. Although not currently identified in the Local Plan as sites for residential development, the proposed eastern bypass route immediately to the west of Fordwich will result in small isolated parcels of agricultural land which will become uneconomic to farm, and will likely be subject to further residential development. All of the proposed new homes will have to be built before any infrastructure is in place, providing further strain on local services. Water and sewerage services are already fully stretched without the additional load these new homes will generate. Even if permission is granted, the new reservoir proposed by South East Water at Broad Oak will not be completed for many years.

In summary, I believe the Local Plan 2045 is deeply flawed and I trust my objections and those of many others in the vicinity of Fordwich will be taken into account in preparing the second stage of the Local Plan 2045.

Lewis Phillips



