



Draft Local Plan 2020 - 2045

1 message

Barrie Gore [REDACTED]

15 January 2023 at 18:29

To: consultations@canterbury.gov.uk

Dear sirs,

INTRODUCTION

I have lived in Canterbury since 1973, and still do. I worked in the City and its vicinity from 1976 until 2003 when I retired. I headed a small legal practice during that period, and also acted as a consultant with a larger practice. I chaired Harbledown Parish Council for about 18 years, and chaired the Canterbury committee for CPRE KENT for 8 years. I have been a trustee of Canterbury Umbrella (a registered charity) of St. Peter's Place, Canterbury for more than 30 years, was the chairman for two years, and am currently one of our two vice-chairmen. I mention these achievements merely to demonstrate that I have considerable experience of residential and business life in the City and the surrounding District.

PRELIMINARY COMMENTS

I write to protest at and object to the above plan. My immediate concerns are that there is no clear and compulsory obligation upon the Council to protect and preserve the historic, cultural and architectural character of the City of Canterbury, or its World Heritage site status, nor the few remaining green spaces within and surrounding the City. Nor is there any prohibition against future development of agricultural land, so vital for food security for the UK. So far as conservation is concerned the Council has to date ignored many of the principles it so fulsomely expressed in the past, and there is no guarantee in the draft LP that matters will improve in this respect. Nor is there annexed to the plan any document produced by the Council's World Heritage Committee, and the absence of such, together with the non-publication of the Committee's minutes for public consumption, is a sad reflection on the Council's attitude towards heritage protection.

In the Local Plan introduction the Council should prioritise its aims so that character, history, culture, architecture and heritage is protected and preserved as a first priority over future development, with a second priority for the preservation of greenfield and agricultural land. The use of grading for agricultural land should be altered to allow addition of grades 4 and 5. It should no longer be an argument in favour of building on agricultural land to aver that any such land less than grades 1, 2 and 3 is not valuable for farming purposes. Many types of food can be grown on land that at present is not graded, so that needs protection also.

I ask that a new large scale map of the City be produced showing the de facto boundaries of the City, coloured suitably, to include the vast areas of new development which fall outside the historic City boundaries. This map should also identify the boundaries as they were in 1960, 1980 and 2000. Persons will then be fully aware of how the changes between 1960 and 2020 have affected the historic centre. In turn this should enable informed debate about future development around the City.

The once famed Conservation Department of the Council has sadly become past history, and this department (perhaps re-named Heritage) should be reformed and "beefed up" so that Planning officers are obliged to take note of Conservation officers' comments and to set these out in their planning reports. The Local Plan should make it clear that planning applications having an adverse effect upon heritage will be refused.

Some of the language and terminology, once again, will be difficult for some people to understand, so they may be unable to comment meaningfully: eg "active travel". What does this mean? I assume it refers to persons walking or cycling, but I may be wrong. Please explain.

HOUSING

1. There is much reference to housing numbers, prompted no doubt by highly debatable ONS statistics. However, recent Government commentary now throws doubt on the housing projections being calculated, and there should be some acknowledgement that it is unsafe to utilise projected figures. The Plan should build upon and act on the proposals listed in the Levelling - Up and Regeneration Bill currently before Parliament. The Plan Inspector should be aware, before the Plan Examination, that the Council does not accept necessarily accept housing targets imposed figures

by Government.

2. Also there has been a failure to date to include student accommodation in the housing figures, when the total of students almost doubles the number of residents in Canterbury. The Council should bring pressure to bear upon the Government to include such student units as residential units when any housing targets are being calculated.
3. There is also a strong argument that cathedral cities and historic towns should not be required to incorporate any more housing because of deleterious effects upon the character of those cities and towns. The adverse effects upon heritage surely do not need to be spelt out. In recent years a Government Planning Inspector refused a planning appeal for development in Durham because of the status of that City and the adverse effects of the proposed development. I invite the Council to read that Inspector's decision, since his reasoning would also apply to Canterbury
4. I note, once again, the provision (window dressing once again) for a minimum of 30% affordable housing, but in the past the Council has often accepted developers' arguments that they are not making enough profit on private housing and that they therefore cannot afford to comply with 30% affordable. The LP should make it mandatory to provide the minimum of 30%, and require developers to lodge sufficient funds, or an insurance bond, with the Council so that if the affordable housing is not built, the council can arrange for other builders to build these houses. I also ask that "affordable" be defined in a different way, since over the years so-called affordable housing has become unaffordable. Social housing is what is urgently needed in all new developments. I should like to see up-to-date housing figures, for persons seeking housing, to include those living in sub-standard housing already so that the Council has a true figure for local people with housing needs.
- 5.. There should be an emphasis on using self-build houses and also small building firms in Kent, to provide a greater variety of designs, and using local materials. The deference to large scale developers in the past, and still continuing to this day, has resulted in grandiose and vast estates with very little to distinguish the buildings from those produced all over the UK. The character of Kent and Canterbury has been severely prejudiced as a result.

TRANSPORT TOPIC PAPER

1. Was this document produced solely by KCC (only its logo appears on the cover), or by Jacobs, or by CCC? Please identify and provide email contact details for the various persons in charge of this paper, so that they can be approached for further information.
2. The lack of clear plans and utter lack of detail in respect of the sweeping changes suggested make it difficult to comment meaningfully. Also under "Circulation Plan Principles" there is reference to "future detailed consultation". Please identify with whom such consultation will take place, and whether the public will be involved.
3. A number of parish councils will be involved in the proposals. The council has already utilised professional consultants to advise them, and it is unfair for parishes to be expected to comment on such important topics without the help of professionals also. For that reason alone, the Council should make substantial finance available for those parishes who wish to take professional advice, perhaps via the annual Budget system used by parishes and the CCC.
4. The proposals would be absolutely horrendous for Canterbury, and would effectively turn the City into a vast building site over some years. Canterbury is just not large enough to accommodate such changes, and the comparison with Oxford and Birmingham is unhelpful, as every town differs in land availability, character and housing numbers.
5. Quite recently the Canterbury Society commissioned a report on traffic, and it strongly recommended a number of small incremental changes to improve the situation. This report was presented to the Council. Could this report be annexed to the draft plan please, and would all those involved in the present proposals please read it.
6. I note that car journeys have decreased in recent years, and that in itself may have been caused by:
 - a. More people walking, cycling or taking buses, which from my own observation and experience is certainly the case.
 - b. Greater use of Park and Ride.
 - c. Less use of cars by local residents due to difficulties in parking and increase in parking fees.
 - d. The guilt factor associated with driving causing air pollution.
 - e. The better provision of buses to the city and beyond since 2008.
 - f. Free travel for senior citizens.

It is likely that this reduced number of car journeys will decrease further in the years to come, and at this stage I should

mention that any increase in electric cars will not lessen traffic jams, and that pollution of a hazardous nature is produced by the manufacture of electric vehicles which is life-threatening in itself. Also pollution of air is not merely caused by fuel, but by the deposit of minute particles such as rubber deposited by tyres and brake systems etc., and these particles are as much a danger as 2.5pms from diesel fuels.

7. I also note the alleged increase in HGV and heavy vehicle traffic, but this is undoubted caused by construction traffic for new development, and the increase in service journeys required for the thousands of additional houses which have been erected since 2008. HGVs only enter the city of necessity, and the provision of the off-slip from Wincheap to London has made an appreciable reduction in HGV city activity. Service vehicles should be managed to (mostly) avoid driving during rush hours. For both types of vehicle the over-long awaited off-slip from London should improve the situation.

8. There is no mention of the various small steps that can be taken to manage traffic better. These might be:

a. No use of cars in the City on one day every week, thus enabling air pollution to diffuse. At the same time to offer Park and Ride sites free of charge. It may well be that visitors would increase on those days to avoid the unpleasant experiences of air pollution, noise, and visual damage to historic areas caused by the amount of traffic.

b. HGV and heavy vehicles to be banned from deliveries/journeys during rush hour periods, and further to ban them altogether one day each week. Planning consents granted to businesses should prohibit them from receiving such vehicles save on specified dates each week.

c. Buses to stop whenever hailed by pedestrians, ie to be used like taxis, especially when car travel is prohibited, when buses should be free for all. Villages on the outskirts of the city should have better services - at present Stagecoach has removed nearly all bus services in Rough Common Road.

d. No more diesel engined buses to be used for short journeys, with single decker electric buses to replace them. The Council will be well aware that in many European cities diesel buses are banned because of air pollution.

e. Introduce a one way system along Wincheap and Simmonds Road. Traffic lights at the junction of the roads by the railway bridge could have a dedicated signal operated by buses coming from the Park and Ride site to give them priority. I was informed by the Council's Transport department that such a scheme would enable considerable improvements to be made to Wincheap, including speed limiting, tree planting, and some decent paving. This in turn would incorporate Wincheap into the historic environment and attract visitors and shoppers. Air pollution would be lessened also. The one way system would allow staggered groups of vehicles to use the roundabout beyond the railway bridge in turn so that congestion is managed better during peak hours.

9. Under "Circulation Plan Principles" the plans do not provide enough detail, nor are the zones detailed enough to enable people to understand how they might be affected. EG in Zone 4 "improved Rough Common Road" is mentioned, but no details of the improvement are given, nor how that road is affected by the proposals in Zone 1 where it is proposed there should be an off-slip road by or incorporating Palmars Cross Hill leading to St. Thomas's Hill or Whitstable Road. People need to know precisely which parts of their neighbourhoods will be affected by these major road works, which presumably will involve some compulsory purchases? There undoubtedly will be considerable planning blight for many residents in the various zones.

10. Under "Highway Infrastructure" there is reference to an "upgrade of Rough Common Road", but again there is no detail, nor how the upgrade marries up with the improvements mentioned for Zone 4. However on-slip and off-slip roads are mentioned but with no detail and no proper plan. Are these to be "improvements" or "upgrades"? These terms could cover a multitude of unacceptable changes to the rural areas. Detail should be set out clearly in the Plan we all know what is envisaged. I must say at this stage that the traffic consultants used by the Council have not covered themselves in glory in the past.

11. Segregation of cycle lanes from vehicle routes is mentioned, as are dedicated traffic lights for cyclists. Some years ago these lights were to have been erected by KCC at the traffic lights in the New Dover Road junction with Oaten Hill and Lower Chantry Lane but nothing happened. It would be good to have 2 or 3 of these lights at different junctions for a trial period to see how they work in practice. They are used a great deal in Holland and seem acceptable to all road users. Coming back to segregation, I and many others have asked the Council to provide a physical barrier between all cycle routes in the city and vehicles. At present, vehicles ignore cycle lanes and use them as part of the highway. This discourages and frightens cyclists. I speak from personal experience. The artist's impression of the road showing segregations of cars and cycles does not show a continuous barrier, so a badly driven vehicle can still mount the cycle lane. Barriers could consist merely of a raised kerb between the highway and the kerb of the footway. An additional benefit would be a reduction in the possibilities of cars driving onto the footway itself.

12. I cannot think that the zoning suggested can possibly reduce car reliance, and persons wishing to go from one zone to another may well have to enter or cross three other zones to do so. Their fuel usage and pollution will be greater than

what would be created by the existing system. Furthermore, the visual impact on the City Centre will be horrendous - just the complicated signage and vehicle recognition devices required will be in substantial numbers. Finally the proposals are unhelpful to elderly people, those with health problems, expectant mothers, and those with disabilities, all of whom from time to time need to get from A to B as a matter of urgency. The council seems not to consider the legal rights of such people, quite apart from the suffering they would experience. I can foresee a legal challenge to these zones and restrictions.

13. Finally can the Council please be more critical of Kent Highways Department, which imposes structures and changes utterly unsuitable for our cathedral and historic town centres. Signage, road colour markings etc. are adversely affecting our visual attractions and there is never any public consultation prior to changes - apart from (sometimes) public notices in the local Press.

Canterbury badly needs its own presence by having its own powers for some traffic requirements.

Yours faithfully,

BARRIE GORE,

