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CCC Planning <planning@canterbury.gov.uk>
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16 January 2023 at 08:34

local plan rep

Regards,

Planning Team
Canterbury City Council
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From: <noreply@canterbury.gov.uk>
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Form reference number: 814280**Date and time submitted:** 2023-01-14T11:48:12+00:00**Page: Your message**

- Your first name Frances
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- Your message Canterbury Local Plan - Consultation Fragile Environment A major concern is Canterbury City Council's (CCC) lack of understanding, care and management of the important and fragile environment around Canterbury. The Stour is part of the World Heritage site. With only 200 chalk streams in the world, its ecosystem and biodiversity is not adequately considered. The Stodmarsh reserve is accepted to be of international importance. It is a SAC, SPA, Ramsar reserve and the council have managed to pollute it with inappropriate housing developments. Now the council are expecting house builders to solve the problem themselves by buying 'nutrient credits'. Are these mitigations mandated by law or can they wriggle out of them? I think this is a recipe for disaster that will be repeated with other building projects. The Thanington Saxon Fields estate abuts Larkey Valley Wood SSSI which is a nationally important habitat for the dormouse. Disturbance, including noise and light pollution, is a major concern except, it seems, for the council. We need adequate buffer zones around these SSSIs that are mandated in law. Amey Consulting Sustainability Report (link below): 'In Kent there are many catchments where there is little or no water available for abstraction during dry periods. Pressures are particularly notable in Kent as it is one of the driest parts of England and Wales, coupled with high population density and household water use. Over the next few decades, there will be increasing pressures from the rising population and associated development. Looking further ahead, climate change could have a major impact on the water that will be available for consumption. (Will the proposed reservoir be enough to mitigate this problem? Several villages were totally out

of water for extended periods last summer) Kent is considered to be one the UK's most wildlife-rich counties. This is a result of its varied geology, long coastline, landscape history and southerly location / proximity to mainland Europe... The last century has seen major losses and declines of species within Kent. Amongst the most important drivers of biodiversity loss in Kent are: the direct loss of land of value to wildlife to built development or intensive farming, which has reduced and fragmented populations; and the effects of climate change'. The proposed developments on the South West of the city The Thanington development is already causing much distress. Traffic is a major concern especially the knock on effect onto the already jammed Wincheap and the village of Chartham which has dangerous pinch points as Shalmsford Street is unsuitable for increased traffic. Kentish Gazette Thanington residents meeting: 'Mr Page said the council had failed to answer crucial questions about how the authority planned to deal with traffic on the A28 when it is already at a standstill. He drew laughs of derision from residents when he relayed how KCC had emailed to say it planned to tackle the congestion by encouraging, walking, cycling and public transport'. The traffic management of these thousands of new houses seems to be predicated on the idea that cycle routes, walkways and buses will take the place of car use. That is fantasy. The council cannot mandate supermarkets to serve housing estates so residents will want to drive to town centre shops and supermarkets. The promise of buses is hollow as many routes have been cut. The bus from Canterbury to Ashford serving Thanington and Chartham has been cut so that the last bus from Canterbury is at 5.35 cutting out workers who finish at 5.30. In Kent, unlike in other parts of the country, senior bus passes are invalid until after 9.30 but the bus around 9.50 in Chartham has been cut so that seniors have to wait until 10.17 for their first bus. Even scheduled buses regularly do not turn up leaving the service utterly unreliable. This does not lead Canterbury residents to have confidence that the council will prioritise bus transport. Cycling will only ever appeal to a restricted percentage of the population. Many of Canterbury outer roads are too dangerous for cycling and the Stour way is on a floodplain and is often deep in mud. The new Redrow development on the outskirts of Chartham is at such an elevation relative to Cockering Road that it would be close to a Tour de France mountain top finish for cyclists! It begs the question whether the design really has cycling in mind. There doesn't seem to be any consideration of security for walkers and cyclists on these proposed walking and cycling routes into Canterbury from outlying developments. Canterbury residents do not dare enter Dane John after dark and CCC do not seem to be able to deal with that or with other antisocial and dangerous behaviours in the city. People will use cars for safety reasons. The proposed Eastern Bypass, that clips the edge of a nationally important SSSI at Chequers and Old Park, will simply fill up with traffic as these roads always do. Has noise and light pollution, already a concern for SSSI Larkey Valley Woods, been taken into consideration for Chequers and Old Park SSSI? Buffer zone? Wincheap. The council seems to discount Wincheap as an annoying pinch point that is holding up its traffic plans. However, Wincheap is a conservation area. It has been a historic thoroughfare since the 13th century and it still has buildings dating from the 15th century. It has an impressive variety of eras represented in the housing and most open onto the pavement. The noise and air pollution is already unsustainable. A children's playground abuts the road with a school behind. I seriously fear danger to the health of residents. Wincheap should have a real time air pollution monitor. 'Over the past ten years or so, Wincheap has become incapable of sustaining its function as a thoroughfare. Residents now complain of their front rooms being plunged into darkness by massive container trucks in tailbacks outside their windows. It is impossible to cross the road at almost any time without using one of the signalled crossings; unimaginable damage is being done to Wincheap's older buildings by a lethal combination of traffic-induced pollution and vibration. <https://www.winsoc.org.uk/history-of-wincheap/> Wincheap ends at a roundabout onto the Canterbury ring road which is already often stationary. I haven't met anyone who thinks this proposed gyratory system through the Wincheap Industrial Estate, into which more houses are proposed (!), will be anything other than a disaster with a pinch point at the Maiden's Head causing dreadful problems. By the way, the Maiden's Head is one of the oldest buildings in Canterbury dating back to 1446 but no one seems to care about the dirt, noise and vibration affecting it. It looks as if this gyratory idea is a desperate attempt to retrofit a traffic plan to problems that will be caused by the Thanington developments and the other proposed South Western developments. Bear in mind that the Wincheap Industrial Estate is next to the Stour. Hollow Lane Hollow Lane, leading into Wincheap, is an ancient access to Canterbury. Just before you arrive in Canterbury there is an ancient orchard which provides extraordinary views across to the cathedral. As you walk across the orchard you can pick up old bits of clay pipes from generations of labourers. The proposal is to develop Hollow Lane and to keep orchards and hedges 'if feasible' or 'if possible'. These vague non-promises occur elsewhere in the local plan where important habitats are at risk. Our experience of development is that, if it is not mandated in law, it will not be feasible or possible. Chartham The council does not seem to understand that Chartham is actually three communities – Chartham, Shalmsford Street, St Augustines. The proposed development of 170 new houses is unsustainable. In particular the increase in car movements through the village in which there are dangerous pinch points is unacceptable. The village centre itself has several blind junctions. Shalmsford Street is a serious accident waiting to happen. There is a dangerous bottleneck caused by parents dropping off and picking up children for the school. Cars fly up Shalmsford Street at high speeds to avoid having to pull into spaces to allow the cars with priority to pass. From Bolt Hill to the A28 there is mixed housing serving all age groups from families with babies and toddlers to the elderly. There are two shops with cars parking and pulling out into the road. There are some houses with off street parking who risk having their cars hit as they pull out. The pavement is narrow and constantly used by local residents, dog walkers, runners, parents with pushchairs, shop customers, children walking home from school unaccompanied. Pedestrians are often obliged to walk in the road to allow others to pass. This is a residential road that is being used as a high-speed thoroughfare and I can't think of any other road more deserving of a 20-mph limit. UNESCO World Heritage Site Canterbury is a UNESCO World Heritage Site but

you would hardly believe it to look at it. It is run down and dirty. There are eight Vape and Mobile Phone shops with their hideous shop fronts on the high street. We know, from the London experience, that they are often associated with money laundering operations and yet the council approves them. Can you imagine this happening in Winchester, Windsor or the York Shambles which are not UNESCO World Heritage sites? Now, after the experience of Liverpool, there is a belated concern that Canterbury might lose its status if we do not work hard to improve the situation but how has it come to this? It can only have come about because the councillors, who are supposed to have the good and future of our city in their hands, do not have vision, understanding or love of the city. The haphazard development of the outlying areas can only put this status under more strain. There is no trust that the council has the World Heritage status of Canterbury at the heart of its planning. This nationally important historical city cannot thrive as an urban sprawl. It will lose its character. The process is not trusted. There is a lack of consultation during the development of the plan and local people do not think their input will be considered at all during the consultation. Many of us agree with the following: The City Council press release on the Local Plan confirms that this is being worked on by officers in secret. This has been going on for months. No councillors are involved in the process. No members of the public, residents' associations or parish councils are involved at all... The new Local Plan will take us up to 2045. The 'preferred option' advocated by the leader of the council (but almost nobody else!) is for 17,000 more houses about twice as many required by the government. These would be centred on Canterbury effectively doubling the population and turning our small, intimate city into another Slough or Swindon... Sadly the sites for these houses will be decided by developers and land owners advocating sites in their ownership. This random range of bits of land will not be made on any town planning principles. There will be no masterplan. No real thought about building proper sustainable communities which are a pleasure to live in. They will be faceless, barren housing estates plonked down on the fringes of the city. There are now no Conservative councillors representing the City of Canterbury. The leader of the council has never sat on the Planning Committee and knows little about town planning. When he chaired the Local Plan Steering Group on the current Local Plan he effectively shut down discussion by refusing to have meetings. Now we have a Local Plan being cooked up by officers with no democratic input and under the edict of a political leadership insensitive to the very idea of good town planning guidelines. The draft plan, when it eventually sees the light of day in the autumn, will be subject to public consultation. Good. But past experience shows that this will be an empty exercise and residents' views will be largely disregarded. So what the leadership and the officers are producing behind closed doors will be what we are given. <https://www.canterburylibdems.org/news/public-and-councillors-gagged-over-local-plan/> Instead of getting an independent report on both traffic and air pollution KCC & CCC rely on reports commissioned by the developer. Negative information might harm the development progress. KCC want the 4th slip road off the A2, CCC want infrastructure improvements which there is no money available to provide. The developer will fund these, in theory, so all focus is getting the development through regardless of any logical reasons or issues why it should not proceed. <https://www.kentonline.co.uk/canterbury/news/why-thousands-of-new-kent-homes-could-now-be-built-271064/> Unanswered questions What do they actually mean by 'high quality housing'? How do they intend to 'restore and enhance natural habitats' by building thousands of more houses bringing thousands of more people to these habitats? They say they are going to support the universities but do not say how. They talk about intelligent transport systems but do not define them. They do not define digital connectivity. They do not give adequate thought to sewage treatment, especially when developing near the Stour. Air quality – 'Quantify the amount of residual emissions a development is likely to produce and a monetary value expected for mitigation' but what mitigation? How are they actually going to get the air on Wincheap breathable for residents? They talk about an enhanced historic and natural environment but, as they fill the town centre with vape shops and consider solar farms on historic landscapes (Old Wives Lees is fighting one at the moment), how will they do this? 'The council will continue to work with partners to improve public transport connectivity!' (p17) The idea that we will have wonderful bus services and that a huge swathe of this new population will cycle or walk is, justifiably, treated with derision. It's laughable, or it would be if it wasn't so annoying. They are considered to be pie-in-the-sky fantasies that sound good and will ensure adoption of the plan while they continue to cut the bus services. They promise their plan will improve air quality but it will bring thousands more cars to Canterbury. There are too many 'if feasible/if possible' to be worth the paper it is written on. 'We will retain existing features if possible – we will keep as much of the orchard if feasible!' It will simply drag people from outside the region to an area whose character, history and ecology is already under strain. The thousands of houses and huge developments are not sustainable if we want to safeguard Kent assets. Do we even need all these houses for local development? We know that we need many more houses in the UK. However, where do we need them and why? There has been much disillusion in Canterbury and its surrounding area because new homes are not designated for our local requirements but they are marketed to encourage mostly Londoners to Canterbury. This is made clear in the marketing for the Thanington Saxon Fields estate: 'Saxon Fields is well connected with Canterbury East Station a 20 minute walk and Canterbury West Station around a 35 minute walk, offering high speed rail services link to London St Pancras in 55 minutes. The A2 is nearby for travel by car, easily transporting residents south through Kent or north towards London, whilst the picturesque seaside town of Whitstable is around a 20 minute drive'. Why are we putting our ecology, biodiversity, fragile ecosystem, UNESCO World Heritage Site status and health at risk in order to draw external populations to Canterbury? It's a scandal. This plan will draw people from London to an area that is already overheating causing damage to fragile and important ecosystems. This Local Plan has lots of vague assertions with no way of mandating that they will actually happen. The proposed building numbers around Canterbury are unsustainable. They will draw more people from outside the county putting more pressure on our fragile and internationally important ecosystem. Yet more biodiversity will be lost. The changes to

the NPPF no longer require so high a number of housing units. I suggest that Canterbury City Council halt the Local Plan, as have other councils, until the new framework is in place. Frances Williams

