



CCC Consultations <consultations@canterbury.gov.uk>

objections to and recommendations for Canterbury Draft Plan 2045

1 message

heather green [REDACTED]

16 January 2023 at 12:23

To: consultations@canterbury.gov.uk

Please find enclosed and attached objections to and recommendations for changes to the above draft plan. I am a female resident of Adisham village in the Canterbury District, age between 55 and 64. the attachment is a document detailing further objections to section R1.

Canterbury City Council Local Plan 2045 objections and comments

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C1a (City Centre Strategy)

The Canterbury Circulation Plan creating exclusion zones will cause residents and visitors to travel further, adding to vehicle emission issues, costing more in fuel in times of economic hardship. Those requiring regular treatment at the K&C will have to travel further instead of crossing the city, adding to any distress caused by their illness.

There will be issues over delivery staff, and those who visit more than one place across the new zone plan, as well as those who need to take their car to work for frequent use during the day.

With the continued closure of the park and ride at Sturry Road, using this option on the Thanet side of the City is unworkable, as no alternative to driving within the city. For employees of city centre businesses, the Park and Ride timings are not conducive to using them - such as hospital, doctor's surgeries and late night opening premises staff. They need to use their vehicles to keep them safe when leaving premises late and night, and travel to and from park and rides is not possible out of specified hours. This will either mean vehicle owners paying to use their vehicles in the city centre, or creating an unsafe travel path.

When children are denied access to school buses due to the bus being full, or cancelled for driver issues, as is often the case now, parents will need to collect their children and this will incur large penalties under the new scheme, which may cause hardship in this economic climate. These occur at short notice so planned permits aren't possible, and the alternative of the child walking to the same zone or near an entrance from the ring road is not safe in this day and age especially on darker winter evenings.

Studies show that there has been a decrease in city centre traffic anyway due to working from home opportunities, cost of fuel, and the closure of several shops.

This idea should be postponed until consultation with businesses, residents, and delivery employers, and revised to reflect their concerns.

C1b :

The whole traffic plan C1 is scheduled to take place in sections depending on funding and requirements, and this may well mean that parts are completed with gaps between the "ring road" and corridor roads. Local villages outside of the ring road will see increases in traffic due to vehicles attempting to find the next corridor section. This scheme technically reduces movements within the city and pushes vehicles into rural areas, smaller country lanes and ecologically stable countryside.

he draft Plan is unsustainable, unjustified and undeliverable. It fails

the tests of soundness set out in the National Planning Policy Framework

(NPPF) and must be revisited with much more consultation than just placing it into a draft plan.

C5 (South West Canterbury) :

New hospital facilities associated with Kent and Canterbury Hospital will be encouraged and supported according to the Plan, and this is strongly supported. However, with the consultation process still some time away, and the Trust having limited funds, as well as CCC supporting the changes to the hospital by a local developer, use of the land around the K&C should be maintained for possible use until consultation processes determine the land is not required. Parking is at a premium at the hospital which forces staff and visitors to use neighbouring roads, upsetting the home owners and congesting the area whilst waiting to find spaces. For staff, it is not feasible to use the four hour parking areas near the hospital, and the staff parking areas are often full. Using the land for extra public or hospital car parking would alleviate congestion and decrease the amount of vehicle emissions in the area, rather than for more residential development in an already densely populated area of the city.

With an extra 2941 homes in this part of the plan, changes to an already overstretched hospital are essential, as full bed capacity is being reached on several occasions not just due to winter pressures. Therefore it is essential that some form of expansion to the hospital takes place before consideration of any new homes and this must include car parking spaces.

C6a (Land at Merton Park) :

The hospital extension must be provided prior to the occupation of 50% of the total dwellings - this means that even if the extension to an already over-capacity K&C Hospital and Trust goes ahead, over 1000 new homes would be built in the area before any changes to the hospital, with many of the new occupants needing in-patient or outpatient treatment at some time.

Changes to the hospital and Trust buildings MUST take place before the building of ANY new homes in the district puts even more strain on a broken system. Developers should not be allowed to build thousands of new homes without changes to the medical, surgical, road infrastructure and utilities including waste disposal. Local hospitals are already running at full capacity regardless of winter pressures and it is essential that existing local residents can be treated.

Waste water treatment works should be delivered prior to occupation of any dwellings on the site - wholeheartedly support this statement as there are sewerage issues and leaks in many areas of the Canterbury district.

C7a (north of Hollow Lane) :

Provision of a new high quality waste water treatment works at an appropriate location within the site, or in combination with Site C6 - this waste water treatment works is to be created before any new housing (735 houses in this section C7). This is one part of the entire Canterbury Council plan that I support. Many areas on the outskirts of Canterbury, or in rural villages both in the Canterbury district and neighbouring villages, currently struggle with sewerage issues and sewerage capacity issues must be addressed.

Building of the recent housing estate near the A2 and the other side of the road from Hollow Lane, has proved very disruptive for both commuters and shoppers in the Wincheap area. Consideration to any future planning and housing development in this area must be considered as a much larger part of the housing needs. It is continually difficult to use the A2 into Wincheap, queueing down the slip road onto the A2 is dangerous for both A2 traffic and that coming from Thanington. Increasing the housing in the area from both C23 and C7 will mean the bottleneck in Wincheap will only get worse. This increases both fuel consumption and vehicle emissions. New road layouts onto and off the A2 with a designated route to and from Wincheap are essential, or more trade will be lost for businesses in Wincheap.

This section agrees to protect and enhance the ancient woodland and priority habitats, and include measures to strengthen connectivity to Larkey Valley Wood, an SSSI and local nature reserve containing ancient woodland; this is essential in order to preserve our woodland flora and fauna.

C10 (South West Canterbury Link Road) :

With two A roads serving east Kent (A2/M2 and A20/M20), both routes need improved access onto and off these road corridors. In recent times the A2 has standing traffic due to the sheer volume of vehicles trying to enter and leave the area around Wincheap and these junctions are targets for accidents.

I agree with the improvement of the access to and egress from Wincheap, with new routes across the area and onto/off the A2.

However these must be a priority long before any further housing developments in the area as congestion especially during rush hour and Saturdays, leads to higher vehicle emission rates, higher fuel costs, and damage to the environment. The planning team must get their priorities right and consider solving the highways issues before embarking on ambitious and hugely disruptive extra housing developments.

C12 (South of Littlebourne Road) :

new waste water treatment plant - essential as several places in the surrounding district flood at times of high usage or high rainfall, plus all waste treated goes to Thanet where Southern Water has already been fined for discharging untreated waste into the sea on several occasions. Southern Water MUST upgrade the pipework and the capacity of the treatment works in Thanet at the same time, or the end result of discharge into the sea will become a bigger problem.

no new schools for these extra houses, no extra doctor's surgeries (which serve areas from Wingham to Adisham, Bridge, Littlebourne, Patixbourne and Aylesham residents, and are currently next to impossible to get through to book appointments or get referrals for investigations). Local hospitals already at or above capacity regardless of winter pressure. This plan allows 140 older people's housing but hospitals are already unable to discharge patients from hospital to care homes so there MUST be a review of care home capacity first.

A257 is already a well used road, with many road closures due to utility work and accidents (plus fatalities in 2022), and needs to be assessed at various places along its length for suitability of the traffic it carries. Route to Thanet via this road into Wingham has also experienced fatal accidents along the Ash bypass stretch and at rush hour the traffic is barely moving, thus adding to vehicle emissions.

Wildlife in the area uses corridors along the river and these will be narrowed due to house building, some rare species such as red kites may leave and never return to nesting in the area. Leaving large wildlife corridors in order to preserve wildlife movements is essential.

Dwelling density of 35dph is akin to that in townships, and not suitable for expanding the village of Littlebourne as it would affect the dark skies policy, and also add light emissions to already existing housing areas. The dph should be maintained at a level akin to that in villages and rural areas.

C13 (Land South of Bekesbourne Lane) :

Closure of Bekesbourne Lane will affect people who drive to the Sturry side of Canterbury from the southern side for work or recreation. This will increase their fuel consumption in the current economic crisis. This route is also to connect with Sandwich and Thanet when the B2046 is closed, and will cause congestion in the areas south of Littlebourne and Bekesbourne if this link goes ahead.

The delivery of the remaining sections of the Eastern Movement Corridor must be delivered prior to the occupation of 75% of the total dwellings - this means that over 1000 houses in the area will be occupied but the corridor will not have been completed, thus adding to vehicle emissions and stationary traffic in the area. ALL link roads MUST be completed before housing is occupied.

Preserving and enhancing long distance views including towards woodland and countryside to the east and south of the site is to be applauded and MUST be consistent throughout the entire Canterbury 2045 plan.

Provide habitat, pollinator and ecology connectivity across the site and with the surrounding landscape, including with Trenley Park woods and surrounding fragmented woodland is to be applauded but MUST be consistent throughout the entire Canterbury 2045 plan. Woodlands are essential for the entire ecology balance of flora and fauna, and can never be replaced. Allowing forestation for walking and exercise is essential post pandemic, and should be retained for mental health wellbeing. Public transport in terms of bus and train services south of this area is very limited, with a narrow timetable in daytime only, and so people living in villages south of the area HAVE to retain their cars in order to work and shop in areas in and beyond the section in this plan. Investigating and enhancing public transport via bus and train in villages surrounding this area MUST be a priority before the development of the corridor and exclusion of private vehicles.

C16 Canterbury Eastern Movement Corridor :

Public transport in terms of bus and train services south of this area is very limited, with a narrow timetable in daytime only, and so people living in villages south of the area HAVE to retain their cars in order to work and shop in areas in and beyond the section in this plan. Investigating and enhancing public transport via bus and train in villages surrounding this area MUST be a priority before the development of the corridor and exclusion of private vehicles. People living south of the area in this section that work in Canterbury need their vehicles out of hours and the current public transport situation does not support this. Charging these to drive through the zones and the extra distance travelled is not conducive to the current economic crisis where every penny must be carefully saved.

C23 (Wincheap Commercial Area) :

C23 designated as Wincheap commercial area, but also includes 300 new homes in an area where many houses are terraced with no front gardens or parking areas.

Vehicles entering and leaving Wincheap cause stationary traffic at the A2 on/off shoot slip roads, and adding 300 homes to the area will increase the movement of vehicles by approximately 600. Building the new changed road layout to allow easier access on and off the A2 in this area will help to reduce the damage caused by higher emissions from queuing traffic, and also help reduce excess fuel costs for those who regularly wait on the A2 and slip roads to progress to their destination.

Consideration to any future planning and housing development in this area must be considered as a much larger part of the housing needs. It is continually difficult to use the A2 into Wincheap, queueing down the slip road onto the A2 is dangerous for both A2 traffic and that coming from Thanington. Increasing the housing in the area from both C23 and C7 will mean the bottleneck in Wincheap will only get worse. New road layouts onto and off the A2 with a designated route to and from Wincheap is essential at the earliest opportunity, or more trade will be lost for businesses in Wincheap.

Rural Areas

R1 (Cooting Farm Town) :

R1a :

Michael Gove stated that national housing requirement is not needed, so the entire Council plan should be paused and revisited once agreement on housing needs is confirmed via the National Planning Policy Framework. No evidence R1 housing needed.

R1 spans the previous "call to sites" request, mapped by SLAA262, SLAA268 and SLA267. SLAA268 is deemed to be NOT SUITABLE affecting entire plan. The others span land which the landowner/tenant have already stated on several occasions that this farming land is not for sale. It produces very high yields of wheat, barley, and other food crops, with low use of horsepower/fossil fuels to grow an average winter wheat yield of 10.5 tonnes (1700 loaves of bread) per ha. With the UK regularly transporting these cereals from war torn countries, it is essential that we protect and keep arable farm land to a maximum locally.

Council plans must be designed in discussion with neighbouring councils, and Dover District Council were unaware of this plan, even during their R19 submission.

One section of their R18 plan was to build 400 homes on the opposite side of the B2046 to R1. This was removed from their plan due to a traffic survey and the unsuitability of that road (fatal accident in 2022, many other serious accidents in the area where vehicles will enter and exit the development of R1). A public consultation was allegedly held June-Sept 2020 (during lockdown rules) but no-one seemed to be aware of this.

3200 homes (tenfold increase) will radically change the nature of Adisham village, and it will NOT be possible to avoid a coalescence between Adisham village and a new town, thus Adisham will cease to exist after 1400 years, and two villages will be combined. The new farm town will disturb the tranquility and peacefulness of a historic small village and must not be allowed.

R1 MUST be removed from the Canterbury plan for the above reasons as the plan is flawed and not thought out rationally or consulted upon with farmers/villagers.

R1b:

Government states that light pollution can be annoying to people, harmful to wildlife and undermine enjoyment of the countryside or the night sky, especially in areas with intrinsically dark landscapes. Areas around R1 have historically been farmland, and villagers enjoy dark landscapes, with skywatching and wildlife tracking at night, and reside in small villages for mental and physical health reasons. Wildlife breeds and feeds in areas they know and R1 development on farmland will upset both the flora and fauna balance in the villages and hamlets that it will adjoin. Rare red kite, white tailed eagles, and other birds of prey nest and forage on R1 plot, building will destroy the ecology and the already rich biodiversity enjoyed in the village. Mental health issues are alleviated by living in peaceful areas, watching natural wildlife, and these will be lost after development.

Our woodlands, Oxenden and Ileden, which are officially designated as a Site of Special Scientific Interest (SSSI) need to be protected not included with R1.

In Adisham we often have waste seeping onto local farmland. Waste that makes it to the pipework system goes to Wingham for first line treatment, where tankers are often used to transport waste unable to be processed. All waste then goes to Thanet for processing and discharge in a healthy safe form into the sea. Southern Water are repeatedly being fined for discharging untreated waste as Thanet treatment works cannot cope, yet they have no plan to solve this. Other sections of the Canterbury plan have new waste treatment works but the largest housing development section R1 has none.

Doctor's surgeries, dentists and the local hospitals are already at capacity, with currently QEQM having 120 patients ready for discharge but occupying beds. Adding 3200 homes to the area without increasing medical capacity will mean more diseases missed and more lives lost as Adisham and surrounding villages cannot get the treatment they currently deserve.

R20 (Aylesham South) :

R20a :

Dover District Council were unaware of this plan. They rejected building 400 homes abutting the B2046 due to inadequate road structure, and therefore this proposal which shows traffic exiting onto the same road MUST also be rejected. The B2046 has been the scene of fatal accidents in 2022 and earlier, and the junction of Spinney Lane and the B2046 is the site of frequent accidents due to the junction layout and the amount of traffic using the B2046. This road ends at Wingham in a 20mph zone which is frequently closed for utility work, forcing the current volume of traffic to use narrow single track country lanes. Many people from Adisham, Aylesham and beyond travel this route for work, shopping in Thanet and the Sturry Road area of Canterbury, plus not having a secondary school in the area, parents take their children to Sandwich, Thanet and Canterbury due to inadequate or costly bus and train services. Adding 400 homes plus a country

park which would hopefully be visited from all directions in East Kent will add to the volume of traffic on a currently inadequate and fatal B2046. This road MUST be upgraded before any new developments for housing or leisure. Public transport in Aylesham, Adisham and other surrounding villages MUST also be upgraded and reduced in cost before any extra housing in the area, rather than being decreased in service timetable as has happened in 2022 already.

Alternative vehicular access via narrow country lanes to Woolage Village, and adding 400 homes/country park will make narrow road layouts impassable at certain times of the day/year. No consultation with villages outside of Canterbury District in this plan which contravenes government planning rules and therefore R20 MUST be rejected and revisited in consultation with DDC.

A new sewer was planned during previous Aylesham building plans but has never been addressed and MUST be improved first.

Birds of prey including red kites and buzzards fly and nest in this area and MUST be protected.

R20b :

No consultation has taken place between DDC and CCC on the changes planned to areas abutting each other in the district. The recent DDC plan at stage R19 did not have any notification of this proposed development in the CCC plan, and thus had made no consideration for the additional vehicle movements, waste disposal, or utility supply for the surrounding area. ALL local plans MUST consult their neighbouring areas before proposals are submitted, and CCC has failed to comply with this. DDC performed a traffic survey of the B2046 and continued road network and determined it was inadequate for their proposal of 400 homes adjoining the B2046 just a few metres from the junction with Spinney Lane. This survey is as relevant to R20 development as their rejected plan and therefore R20 MUST be rejected for the same reasons.

Defra announced this month that farmers will receive increased payments for protecting and enhancing nature and delivering sustainable food production under the Government's Environmental Land Management schemes. Agricultural and grazing land has been seen to be needed, as the UK needs to become self-sufficient in current climate where we would normally import crops, and not by destroying land for more crammed in housing. The UK needs to increase its crop and meat production as both the pandemic and the Ukraine war have shown that we now have a shortfall in being able to keep supplies to the level needed by current UK residents. Therefore proposals for new housing developments need to take this into consideration and use brownfield areas rather than greenfield and farming land which cannot be replaced if destroyed.

The current sewerage system in the area is via old pipework and feeds into Thanet waste treatment, owned by Southern Water who have been fined for repeated dumping of sewerage onto Thanet beaches. The sewerage system is inadequate at present and MUST be upgraded before any housing developments in this area add to the volume of waste.

R21 (Local Support Centres) :

Adisham should not be designated a local support centre even though it has a school and a village hall. The hall is used sporadically and the village only contains approximately 300 houses and 650 people as such should retain the right and protection of being a village.

By its new definition as a local support centre, Adisham development should :

protecting the network of valued open spaces and sports and recreation opportunities at the settlements;

there is an identified local need for the proposal which outweighs any harm;

the development would be well related to and proportionate to the scale of the existing settlement and protects the rural character of the area;

the development would not undermine the viability of existing provision within the settlement.

R1 as part of the Canterbury plan to change Adisham from a 300 house village into a 3500 home joined farm town with the next village contravenes all the above set out by the plan for a local support centre,

and/or the village it should be defined as being. R1 must be removed from the plan on these grounds alone.

R22 (land west of Cooting Lane and south of Station Road) :

R22a:

Creating 10 houses with only three "affordable" does not support the need for houses for the villages own families. They ALL need to be affordable for local people, as many are waiting to buy or rent in the village.

Sewerage currently spills over farmers fields via manholes during extra demand and high rainfall, with drinking water boreholes affected. Wingham waste pumping station already requires tanker effluent removal during the year so is not suitable for current purpose. New houses will increase demand and the old 4" main in this area must be renewed before any new housing.

Station Road has much higher traffic volume whenever the A2 or B2046 (towards Wingham) are closed. This road narrows at the brow of the hill at the end of R22, culminating in an area where cars park on the footpath due to the road width as there are only 12 parking layby spaces available in Station Road. Requests to have car parking laybys increased needs to be revisited before any houses built in this area.

Adding housing will generate extra cars travelling in rush hour with congested downs Canterbury route, and difficulty getting out onto B2046. Over 100 vehicles per hour in "rush hour" noted when Wingham village shut.

The first house on R22 will mean more restricted view from traffic emerging from Cooting/Bloodden, at an already dangerous junction. Large lorries travel up the lane and these have a poor turning circle, thus risking damage by physical means or vibration to the first planned house in the plot, so the location of the 10 houses in R22 is questionable.

All cars emerging from the new houses will be met by the same traffic from the B2046, and this is on a blind corner from the far side of Cooting Lane with three serious accidents in recent years.

Vehicles emerging from the new builds will also be hidden from those in the dip at the bottom of Station Road (as currently) travelling upwards. Sections of this road are not wide enough with parked cars to have two cars abreast.

R22b:

Adisham has been in existence for 1400 years, visited by many birds & animals which use farm fields for hunting, nesting & stopovers to other areas. Rare red kites are seen circling on a daily basis & take their food from R22 land. Long tailed tits use the trees & hedges as a stopover on their migration path. Little, long-eared, barn & tawny owls use this plot on their flight path, frequently perching & nesting in R22 foliage & in the gardens that back onto the railway embankment opposite R22. Protected bats regularly hang in the trees at night & their corridor is across R22. Removing the wildlife corridors & food source by building on R22 will destroy the habitat of many animals and birds.

The sewerage system in this part of the village is old & only a 4" main, several properties have issues with flooding of waste when there is a large amount of rainfall or during increased waste production such as holiday times. Adding 10 more properties without changes to the pipework will cause more problems as capacity is exceeded & some of the flooding is in areas where fresh water pipes also traverse. An upgrade is essential before R22.

Building opposite existing houses on Station Road will affect the sunlight in those gardens due to the position of the sun's traverse, as many plants are grown specifically for these conditions & will not survive. Light pollution from these houses will affect the dark skies policy as several people use the area for stargazing and watching other sky phenomena and wildlife, dark skies policy needs to be maintained for wellbeing & mental health issues. Affordable housing in small numbers is needed, with continuation of the housing in Bossington Road recently put forward as an option with better views of roads, limited effect on dark skies policy & is a far better & safer alternative roadwise.

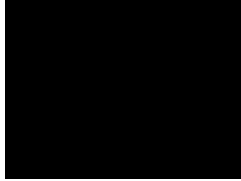
Electricity in this area is supplied by overhead power cables which have limited pole connectivity. Consideration of a new underground supply is imperative.

Sustainability of call for sites

Call for sites for land to be used in R1 was not discussed with landowners and tenants. Despite those people stating the land is not and will never be for sale, CCC has included these in the plans for R1. Parts of these SLAA268 are already in the call for sites spreadsheet as being NOT suitable for development.

Yours Respectfully,

Heather Green
RODP BSc (Hons)



R1 supporting document.docx

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