

I wish to the following aspects of the LOCAL PLAN to 2045 and endorse many of the comments made by ACRA and CPRE in their responses.

BETTER CONSULTATION PROCESS.

Like CPRE and ACRA, I would like to express dismay at the consultation process which has been off-putting and over cumbersome.

ACRA :“Many residents have complained of difficulty of navigating both old and new versions of the CCC website .If and when they do reach the Local Plan section they are confronted with an extraordinarily complex and lengthy questionnaire which whilst completely appropriate for professional users is almost incomprehensible to the layman “.

This was the experience for many in Sturry also, especially as the Council has chosen to run a number of other consultations relating to the Local Plan simultaneously to the Local Plan consultation, with the consultation running over the festive period. Whilst it will be claimed the 12 weeks given is longer than that given elsewhere and point to the media attention which has been given to Canterbury Circulation Plan, this does little to counter the fact such factors will undoubtedly have put many off engaging with the process who may have otherwise done so. Many local residents are still totally unaware of the allocation of sites and development plans for the area.

UP TO DATE FIGURES and NEW LEGISLATION

I am in agreement with ACRA that this Plan, as it stands, is deeply flawed and that CCC should now take the opportunity proffered by Mr Gove to reflect and consider a new approach as other councils countrywide have taken the opportunity to do –BE BRAVE, Canterbury City Council, and consider the needs of the communities as a starting point based upon real and up to date evidence!

ACRA state: Housing numbers and the size of individual units are determined solely by their capacity to free up funds for the construction of the aforementioned superfluous new roads (As in site 2 at Sturry in the previous local plan).The unsustainable overconcentration of the proposed developments in the areas to the east and south of the city is ill thought through and unacceptable.

CCC seem consistently to use flawed approaches in their calculations (as in the Open Space policy listing Sturry as having sufficient space by including Thornden woods) or outdated figures (the last LP used extremely outdated traffic figures to support the Sturry and Broad Oak development proposals).

We as residents should, at the very least expect the most recent census date to be used alongside up to date figures regarding the much changed student population of Canterbury (and their new bespoke accommodation) to be used to formulate current housing need.

CPRE state: Additionally, the consultation material accompanying the proposed revised NPPF suggests that a university town with an above-average proportion of students would be an example of a local demographic characteristic which may justify using an alternative to the standard method. Canterbury has one of the highest ratios of students to permanent residents in England, at 16.4%, compared to a national average of 6%. This is clearly a significant issue for Canterbury, yet the extent to which this is leading to over-estimations of population remain unclear. This is despite CPRE Kent raising this issue within a previous consultation response.

As it is, current ONS data shows that natural population change in Canterbury has been negative in 19 out of the last 20 years (i.e. more deaths than births) meaning population growth within the district has been driven almost entirely by net migration.

1. Compounding the issue, Canterbury has not been delivering the affordable housing the district clearly needs, delivering on average 69 affordable houses a year over the last 5 years, of which on average less than 9 a year have been social rent affordable houses. This is in a district where only 2% of residents can currently afford a house on the open market on their incomes alone

2 . Consequently, the housing that has been delivered and is already being planned for is predominantly to accommodate an external market demand rather than the existing populations housing need.

All these factors should be newly considered before forging ahead with flawed plans based upon historic figures.

SEWAGE and WATER PROVISION

Inadequate provision is available for all new developments at present in the Canterbury area and the solution of on site treatment works and removal by lorries is a retrograde and hazardous one. Not only is the prospect of this an antiquated one, but surely compromises the commitment to reducing air pollution and lessening traffic circulation. Another example of development first and infrastructure later...

Sturry sewage works is currently almost at capacity and there has been no cogent solution to this –a recent article in the Kentish Gazette quoted CCC as stating they “hoped” capacity would be enlarged –how would these proposed developments be serviced?

OBJECTION to POLICY R18 -110 dwellings on land behind Pope’s Lane, Sturry.

I attach, for reference, the City Council's own response and reasons for refusal of the last application to develop Popes Lane in 2019, which are still relevant –the need for farmland is now even greater and the developments in Herne and Broomfield have greatly added the amount of traffic heading to Canterbury via the A291.

AGRICULTURAL LAND –although this is grade 3 land, it has been in constant use for food production for at least 25 years and has produced cereal crops for the last few years along with beans and peas, The global need for cereal production is well known and now of even more import since the war in Ukraine.

The ancient woodland next to the site provides habitat for many species and slow worms, smooth snakes, frogs, toads, newts, common lizards and nightingales have been sighted regularly in the environs of the field and they would all encounter difficulties in crossing the area. The bat colony would also be adversely affected and the light pollution created would have a negative effect on the village edge creating another merging of lit areas.

ARCHAEOLOGY

There are reports from 1997 demonstrating that Anglo Saxon remains of are on this site and further investigation is needed to discover the exact extent of this so that it can be accurately recorded and the area avoided.

AIR POLLUTION will be greatly increased by all the forthcoming developments and the recent encouraging signs of action by the city council need to recognise the impact of the cumulative effect of all the concentration of building in the area, most of which will congregate upon Sturry, Please see Ashley Mills's comments upon the Broad Oak application in 2017, as they are also most relevant to this application.

TRAFFIC

As evidenced last time this site was proposed, the development of this site would create severe traffic problems. Popes Lane is less than 5 metres wide for most of its length. This is narrowed to a single lane carriageway by the presence of substantial on street parking by nearby residents. The existing parking leads to a shuttle working system and motorists frequently must wait during peak times. This development will need to provide space to widen Popes Lane to ensure that the road does not become blocked by the increasing amounts of traffic. Hawe Lane / Popes Lane are used as a short cut for traffic to avoid the A28 and this will be likely to increase with the new link road as increased traffic from new developments will search for alternative routes. This development will have a notable effect on the junction, as all its development traffic will have to enter Popes Lane, and this will require mitigation measures. Only one access is proposed into the site, contrary to the Kent Design Guide which requires a secondary access road be provided for any developments more than 100 dwellings. The highways response lays out the already existing overcapacity and the consequent danger increased on local roads (the A291 is already referred to as one of the most dangerous roads in the country and evidence offered by your own highways report supports this) and the Sweechgate junction in particular. Hawe Lane is an extremely narrow country lane with sharp bends and is not suitable for extra traffic. Since the last application, a new roundabout on the A291 just to the North of Popes Lane has been built (moved from its original proposed site on the Broad Oak plan), thus adding to the danger of the Sweechgate/A291 junction previously cited as a factor in the denial of permission.

GREEN GAP

The developers have highlighted that there is a protected green gap to the west of the development site alongside the A291, and a further green gap to the west of the A291. The site to the west of the A291 falls within the Broad Oak development, and now has a new roundabout on it. The development north of Popes Lane will essentially merge the villages of Broad Oak and Sturry except for a 90-metre-wide "green gap", I would argue that the whole area north of Popes Lane is outside of the village boundary and should be considered as a green gap.

CUMULATIVE DEVELOPMENT

There are several developments currently proposed and approved, all of which are programmed for completion by 2031 (the end year of the local plan). Much of these works will require traffic management, including road closures. In addition to these works there are also plans to commence construction of the Broad Oak Reservoir, just off the A291 approximately 1km from Popes Lane, which is currently out to public consultation. This construction taking place during the same period would be hazardous, and disruptive enough without adding this extra development in an area which is going to be extremely busy over the next few years.

Please see below an excerpt from the CCC submissions opposing Popes Lane development in 2019:

**IN THE MATTER OF
LAND AT POPE'S LANE, STURRY
PINS REF: APP/J2210/W/18/3216104**

**CLOSING SUBMISSIONS
ON BEHALF OF CANTERBURY CITY COUNCIL**

Introduction

1. The main issues in this appeal were identified by the Inspector at the outset of the inquiry and are as follows:
 - i) The effect of the development on traffic and highway safety;
 - ii) The effect of the development on the character and appearance of the landscape and the area generally;
 - iii) The effect of the development on heritage assets;
 - iv) The effects of the development on agriculture;
 - v) Whether the district has an adequate supply of deliverable land for housing development; and
 - vi) Whether the appeal site is suitable for the proposed development, having regard to relevant local and national policies.

OBJECTION TO POLICY SS4

The proposed Circulation plan has received much publicity and opposition and I urge CCC to take into account the expert comments of Mansell Jagger as below.

I wish to object to Policy SS4 in the strongest possible terms.

1. The proposed *Canterbury Circulation Plan (CCP)* is an untested theoretical model which cannot be applied to an historic town like Canterbury.
2. Imposing the Plan on Canterbury would not only cause untold environmental damage to the environs of the city but also result in unacceptable damage to the economy of the city. With its zoning system and threatened fines for using cars, it would also impose quite unwarranted and unacceptable restrictions on the daily lives of residents of the city. It shows an alarming lack of understanding of how Canterbury actually works.

3. Given the Government's and motor industry's commitment to electric and other non-polluting forms of transport, in a few years time air pollution from traffic will no longer be a major issue.
4. The idea of reducing traffic congestion in the city seems laudable enough, but the huge amount of new development proposed in the Local Plan would mean that the CCP would not only fail to solve any perceived problems but actually make the situation far worse.
5. The Plan proposes the closure of all city centre car parks and their "relocation to locations outside of the inner ring road." No site-specific proposals are made and the whole idea is clearly unrealistic and unaffordable. Closing the car parks would severely restrict the numbers of shoppers and visitors to the city centre and harm its viability. It is most surprising that the City Council would wish to abandon one of its few substantial sources of income from its (exorbitant) car parking charges.
6. The Plan also envisages the provision of new park and ride sites to serve the 'radial roads' yet the Council cannot even afford to keep all three existing sites in operation
7. The expectation that everyone will walk or cycle everywhere in the city is clearly untenable. Canterbury is not and never can be a 'cycling city': it simply is not flat enough!
8. The idea of building expensive new roads to cater for forecast growth in traffic was abandoned in the 1970s after the physical damage and blight caused to so many historic towns, including Canterbury, by the attempted imposition of a similar theoretical model - the "Buchanan" traffic plans of the 1960s.
9. The draft Plan proposes an "Eastern By-pass" to connect the A28 at Sturry with the A2 at Bridge. The authors of the Plan might believe that a by-pass might help "solve" traffic problems in the city: I can assure them that it would do no such thing. The purpose of a by-pass is to take **through traffic** away from the centres of towns and villages (like the A2 Canterbury By-pass which took the London – Dover traffic out of Canterbury).
10. In contrast, the amount of **through** traffic on the A28 is very small indeed compared with the traffic with a destination **within** the city. The by-pass would serve very little purpose and never pass any cost/benefit analysis. It would have no effect on traffic in the city and would never be funded by the County Council, which is why the Local Plan now proposes building thousands more houses than even the Government wants. The latest idea to force all traffic to go round the city and call it an "Eastern Movement Corridor" appears to be a last-ditch attempt to justify this costly and unnecessary road.
11. The whole traffic plan appears to be scheduled to take place, bit by bit, if funding is available from new development, over the next 25 years, The estimated costs included in the Local Plan are huge and do not take into

account future inflation: apart from contributions from continuing to build thousands more houses, there appears to be no idea where the funds would come from.

12. There is also the clear long-term intention of carrying on to develop the whole of the area to the north of the city, from the University to Sturry, with an equally costly and environmentally damaging northern by-pass, in the following 25 years.

13.

I also urge CCC to take note of the expert response on the OPEN SPACE POLICY by Sturry Parish Council in order to retain at least the minimum amount of open space for this overburdened community.

