Response to Draft Local Plan Consultation. January 16 2023

Janet Morgan

The number of new homes proposed over the period is way too much and has wrong types of housing

The advice given by Edge Analytics was that 806 dwellings per year over the period was required. CCC have chosen to target 1263 per year, an overage of 57%. The ONS projections do not support the CCC figures.

The government target was less than the CCC figure, too, and this in itself needs to be challenged as it is too large for the demand and is not supported by ONS figures.

If the Plan is based on housing levels which exceed demand, developers will either not commit to or not complete the quantities because they will not be able to sell them all.

This will leave a shortfall in the associated funds that CCC need to raise to produce other elements promised in the Plan.

The whole basis of the Local Plan is therefore very rocky.

If this goes ahead, there would be the worst outcome of partial developments in the wrong places (eg along Littlebourne Rd) and no materialisation of the EMC which will not be affordable when the time comes.

The EMC has not been shown to be a feasible location. It passes through the northeast corner of the Old Park and Chequers Wood SSSI, where there is alder carr, priority woodland, and encroaches on other ancient woodland where it crosses Stodmarsh Rd. It will destroy the wildlife corridor between the internationally important RAMSAR site Stodmarsh NNR and the Old Park and Chequers Wood SSSI. This is in direct contradiction of the Local Plan's stated aims.

There will need to be a very thorough ecological assessment of the route, which will cut across farmland down alongside the Lampen Stream, which is connected to Stodmarsh NNR. The importance of protecting the Lampen Stream from pollution is already recognised as an issue in the Mountfield Park development so to have a bypass travelling alongside it is very far from being feasible. There are important archaeological findings related to homo bergensiensis some 500,000 years old in the areas around Fordwich, Moat Lane and Stodmarsh Rd. This again raises issue of feasibility for the EMC.

I understand that KCC would not agree to the level of development that CCC want because of the traffic issues. Therefore, the way to fix this was thought to be to build more roads. More roads create traffic. They do not reduce it. In the scenario proposed here we would all have to drive extra miles around bypasses to get to destinations which are geographically close by. This is nonsense. Another consequence of this approach is that in order to justify/fund the EMC there is a huge concentration of new housing around Littlebourne Rd and Bekesbourne Lane. C12 – 1400, C13 -645, C14 – 67, C15 -74 (total =2186) and this all joins up with 4000 already assigned at Mountfleld Park in the existing Local Plan.

The planning of housing numbers has not taken account of need because the numbers are too high for predicted demand. It has not started by looking for the best locations. It has plumped for ones that have been -put forward, including good quality agricultural land, at a time when we should have already learned the lessons of growing more of our own produce. The types of houses are too weighted to larger 3 and 4 bedroom dwellings compared to what is needed. This was explained to us by Ben Fitter Harding as being in order to raise greater developer contributions. The social housing proportion needs to be 40% but the Plan seems to deliver 30%.

There should be a 400m buffer zone around any SSSI as recommended by RSPB. This is particularly necessary for Old Park and Chequers Wood SSSI where there are ground feeding and ground nesting birds. This is a strategically important site for nightingales and turtle doves and we should be proud to cherish them and give as much protection as possible, in line with what the Local Plan professes to achieve. C16 and C15 are not compatible with this.

I welcome the ideas that public transport and walking and cycling can be made more universal but I cannot see a proper solution to Canterbury without an innovative approach to public transport. Many people who are less mobile or travelling with families cannot do so with current public transport. Past plans have relied on lip service to modal shift and are now acknowledged to have failed. If the proposed zoning comes into effect I can only see the death of Canterbury City. It will be too hard to visit, too hard to go to the theatre or restaurants or orchestra practice or fitness classes or interesting shops or even the supermarkets. If we are reduced to ordering everything online then our roads (with the modal permission) will be even more awash with delivery vehicles. The whole thing is inside out. We need to make it easy to travel to the centre. We should not go miles around the edge. Public transport is a big challenge because the Council has no power over it. Instead, it needs to find new approaches to make public transport much more successful as a means of transportation for everyday chores, carrying chopping, visiting friends, getting children to school, taking evening classes or attending events. Instead of closing the Sturry Road park and ride to save money (as the Council has done), there should be an examination of why it was not being used and what need to be done to make it successful. After all, that is an income stream if it is fits the market need.

There are many issues with Water supply. The number of water leaks around the Ciity after the cold snap this December was an eye=opener to me. There are parts of Stodmarsh Rd where the pressure levels are low and have been for years. Nothing is done. Clearly infrastructure is reaching old age. The problems of sewage treatment and disposal have been an issue for years, district wide. With increasing heavy rainfall the drains will continue to overflow the treatment plants. There will be more and more flooding on the roads. Drainage will need to be improved. These issues should be sorted out before any more development ambitions are furthered. I will attempt to cajole the consultation questionnaire to accept these thoughts but it will not be easy, so this is my response in full.

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