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planning and conservation advice

REPRESENTATIONS IN RESPECT OF THE CANTERBURY DISTRICT DRAFT LOCAL PLAN TO 2045

DRAFT POLICY SS2 –Sustainable Design Strategy for the District

This policy appears to be principally targetted at new settlements or major developments; it does not seem to have regard to the NPPF para 8 which sets out that “sustainable developments” should have economic, social and environmental objectives. These objectives, which must be held in the round and balanced against each other do not seem to underpin the approach of the local planning authority, particularly to the development of smaller settlements and villages. This leads to the following observations:

DRAFT POLICY - SS3 Development Strategy for the District

This policy responds to a set hierarchy of settlements, the rationale for which is not explained and which pays no heed to the NPPF para 3 concepts and objectives of “sustainable development”. Indeed many of the “local service centres” have no more ability to fulfil that role than do many of the villages. In fact the drawn boundaries of these “local service centres” (SS3.6) are drawn so tightly as to pretty much preclude any new residential development. SS3.7 which covers all smaller settlements within the District indicates clearly that new housing will only be allowed in the most exceptional of circumstances.

Effectively this policy condemns most of the District to wither on the vine with an ageing population and an inability to build new to introduce newcomers to villages and settlements thus limiting the ability of settlements to be self supporting socially and economically, in direct contradiction of the sustainable objectives of the NPPF.

Par 69 c) of the NPPF indicates that great weight should be given to windfall sites in existing settlements and it does not qualify what it means by settlements; NPPF para 79 indicates that villages should have opportunities to grow and thrive, and without growth many villages cannot and will not thrive. Furthermore whilst para 80 NPPF indicates that “isolated homes” should not be allowed in the countryside it is not a blanket prescription against all new homes in villages, hamlets and lesser settlements. The “Blackmore End” case in the Court of Appeal has clarified that “isolated” is to be given its ordinary meaning and that a new dwelling in the countryside, set with others is not to be treated as isolated.

This was a very significant ruling, Braintree DC v SoSCLG and other respondents 2018 and you should be aware of this, if not I will let you have a copy. You probably should also be aware of the Court of Appeal case of Julian Wood v SoSCLG and Gravesham BC which established that sites outside defined village boundaries can still be considered infill plots if physically within a settlement. Again I can let you have a copy if you need one.

Of course none of the above should indicate that villages and the rural areas should be a free for all for development, only that there should not be an automatic refusal of permissions. Policy surely should allow for such new developments that would support rural communities and para 79 NPPF clarifies that development in some rural communities can support services in others, this will be particularly so when social and economic factors are taken into account. The test must surely be whether any interests of acknowledged importance are harmed, not whether there is any breach of an un-evidenced written diktat.

DRAFT POLICIES R21, R 28 AND DS4 - Rural settlement policies

All the above comments also impact on the above 3 policies which are drawn so tightly as to preclude almost all new housing development outside the major urban areas and all of which are in direct conflict with the quoted policies of the NPPF.

Nobody wants to see a free for all in the villages with housing estates, even quite modest ones, plonked on the outskirts of small scale settlements but communities should be able to grow organically as they have done historically, a few houses at a time; applying the “interests of acknowledged importance” test should suffice to ensure that small scale developments could happen, contributing to the social and economic life of settlements without undermining their characters or countryside interests.

GENERAL – housing dispersal

What planning policy needs to recognise is that people do not necessarily work or socialise where they live, they may well use local shops and social facilities, public houses and so on whilst living much of their lives outside the immediate locality in which they live, in so doing supporting neighbouring communities.

Cramming people into housing estates on the outskirts of towns is not necessarily the answer, the theory may be that people will walk or cycle into town centres, the reality is that most won't, they'll use the car, perhaps it's raining, or there's shopping to carry or it's a linked journey, or perhaps a journey to work where a vehicle is required, maybe the children don't go to the local school?. All these and other reasons contribute to people living where it suits and where they can afford, one man lives in the countryside and works in town, on his journey he passes others doing the opposite. It is pointless putting too much emphasis on “local”.

DRAFT POLICY SS4 Movement and Transportation Strategy for the District

Whilst the ambitions of the Canterbury Circulation Plan may be laudable, and not all will agree with that, the price to be paid in terms of the impact on City residents will be too high and the “Stasi” like introduction of movement controls is excessive in its impact on individual freedoms. The “problems” of the City centre ring road are exaggerated, as anybody from a more heavily trafficked area will attest. There is a morning rush hour, compounded by school journeys, there is a mid afternoon school related surge and there is a homegoing rush hour; for much of the day there is no problems for residents crossing the City.

Research years ago found that there was a considerable supply of private parking within the City, the use of which contributed to traffic during the rush hours and with a large number of educational establishments in the City there is an even larger number of employees vehicles contributing to rush hours, and that is exacerbated by school running parents. Problems have been intensified by local authority, well

intentioned actions in introducing half-hearted bus lanes and closing access to rat runs, forcing traffic onto limited road space with the intention of making driving in the City difficult and forcing people to use P&R buses.

With a ring road, as happens in larger cities with which I am familiar, people entering the City drive round to take that entry road which gives the easiest journey to their destination; traffic which wishes to by-pass the City can do so. A ring road should thus address some of the pressure on the inner ring road but, at the end of the day, we are a small City with all roads leading to the centre. With all roads being narrow and having many junctions; with many vehicles stopping and turning, traffic flows are constantly disrupted, stopping cross town traffic is not going to stop this although it will make matters of some roads and increase air pollution generally.

The compartmentalisation of Canterbury appears to be driven by the thinking underlying “the 15 minute City”, whereby residents can find everything they need with 15 minutes of their home address but in a real world we do not necessarily wish to shop at our local convenience store, we may wish to cross town to a supermarket of our choice, and we need the car to carry home the shopping; we need it to visit the doctor and the dentist as well. We may well not work within our 15 minute zone or City wedge, perhaps our children do not go to the local school, and yet we are to be punished by fines for living our lives as we do. Not all of us are young enough or fit enough to walk and cycle everywhere are we to be punished for age or ill health or for exercising choice in a free society?

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