

CANTERBURY DISTRICT COMMENTS ON LOCAL PLAN

By Nicholas Blake B Sc . I make these comments as a local resident: CT27LB

None of the LP affects my property directly except in the general sense that it affects all residents.

I have lived in East Kent since the 1970's and in Canterbury District since 2003

I have over 45 years experience of making Planning Applications.

I wish to make comments to the following sections of the LP. The relevant policies but other comments have been made where policy numbers do not apply so it is hoped that CCC will respond to those in addition.

In addition to this text I submit 4 No. photographs showing: The view of the Cathedral from Stuppington Lane and three views of Hollow Lane which feature the "cliff edge" and A2underpass.

1 FORMAT OF THE PLAN

1A There is no index to the plan making it difficult to look up references to issues within the 283 pages

1B All land areas are given only in Hectares (ha) not acres. It is clear after asking people, that only professionals in the development sector area aware of the size of a hectare. At no point is mention made of a hectare being approximately 2.5 acres. This is a symptom of the document being conceived by planners for planners.

1C Other proposals are currently put forward by CCC including the controversial "zoning" ideas, upon which the LP relies. However this and other documents are not even mentioned in the LP. They should have been footnoted with access details on all relevant LP pages. Comment is made on this at my section 3 below.

1D There are no photographs or drawings in the whole LP. Where maps are provided, they are of a scale that is inadequate to be able to see if the proposals are feasible. How can a LP be put forward without this information? The desire and need to communicate by illustration as well as text should be instinctive to any skilled town planner, as has been the case all through the history of the discipline since it was created in 1914

2 ASSUMPTIONS WITHIN THE LP

2A . **Housing Numbers.** At 1.4 on p 5 it is said that “this plan responds to more recent changes to the NPPF ,which further increase the rate of housebuilding the government expects to see in the district....” Elsewhere it is noted that the figure has increased by 50% since the last LP.

The number of new homes proposed in the district is XXXXX. The ONS figure for predicted population growth in the LP period is 5.8% for the UK which approximates to 6.3% for England to allow for less growth in Scotland and England.This figure is not given in the draft LP so a realistic comparison cannot be made by the reader. It is difficult to unambiguously state the number of houses proposed in the plan period because it would contain many, as yet unbuilt , from the previous plan. The 4000 at Mountfield represent the largest single number in that category.

It is clear that the number proposed for our district is an increase of about 35% but between 85% and 100% for Canterbury itself. This enormous gap from 6.3 % is not explained or justified. It is acknowledged that the gap is to be explained by a government algorithm but the LP does not include an explanation of this.

The provision of vast numbers of additional homes is, presumably intended to drive down the prices of market homes. No calculation of this has ever been provided nationally or locally. If such a significant price fall did occur it would put house buyers from the last ,say 15 years into drastic negative equity and also lead to insolvency of lenders. In practice it would not be likely to happen as developers would carefully manage their delivery of homes to avoid it. It is noted that the developer of Mountfield expects those 4000 homes to take 20 years from now to be built and that is for a site where planning consents are,in part,extant.

The LP attempts to say that these new houses are needed by “our communities”as at, for example Policy C5 p29 and at 2.10 it says that “a range of housing is needed to meet local needs” given the 35% increase , it is clear the most of the housing is to house inward migration ,not for local market or affordable needs. The LP does not make this clear or in any way challenge the enormous figures given.

It is apparent now, since the writing of this LP, that government is very aware of the need to take into account special local environmental issues and it is highly likely that could lead to a rational downward revision of the figures. CCC should pause the LP process to allow for this.

2B HIGH QUALITY DESIGN. Policy SS2 DS6

On pages 7 ,10 and11, this is specified: “new development should be responsive to the distinctive local character and history of the /district “.See also 1.13 on p 10: “High quality design is a key priority for this plan and it is critical that new development is sensitive to the unique character of our district...” The analysis of each proposed site repeats the mantra as at Policy C12, “in line with Policy DS6”, that it will provide a “high quality built environment”.

At p 199 Policy DS 6 p201, items 7,(a) and (g) emphasise good design again.

This LP fails to assess if the current LP ,which has similar design ambitions including “local distinctiveness”, has achieved its aim. The evidence is being built all around the District right now .Almost every site contains the standard offerings of the national developers. It appears that Planning in our District has achieved no uplift to the quality of building or spacial design. Areas of wasteful and useless open space have been created with no achievement of a sense of place as the LP requests at 1.14.p10 What has gone so horribly wrong? Has there been no intention to achieve what the LP asked for? There is no methodology in the LP to suggest that any improvement. An audit as to whether the current LP has delivered what it intended is sadly absent. That illustrates the gross inability of CCC to be introspective about any aspect of the LP. Past performance is a vital indicator of how the future should be conceived.

2C SUSTAINABILITY Policy SS2

Quite rightly, this is included as an aim in this LP but there is little attempt to define . Community hubs, to provide local services, are specified at 5 on p 11 and repeated for the main sites with attractive sounding “format of a high street or village/town square” (eg (d) on page 49) There is no description of how the market is to provide them and at most a Sainsburys Local might arise if custom is thought to be adequate. A street of shops is highly unlikely, at a time when on street shopping is declining because of on line shopping.

In the analysis of each site the assertion is made, as at Policy C11,p 46 , that sustainable communities will be created. On p 27, for no given reason, the south West SDA is said to be “set into a highly sustainable and accessible location...” Generally they are beyond the edge of the built area of the city and contain so much open space, in an attempt to appease lovers of countryside, that they would be difficult to serve by viable public transport. Not in one case is any debate offered as to whether each of these sites is really sustainable. The value of the term is rendered meaningless, as we learn it is only applied because CCC has decided without reason that it is the right thing to say.

2 D GARDEN CITY PRINCIPLES

Helpfully at Appendix 2 there is a glossary but no definition of these principles is included. It is as if we are all aware of them . Clearly, as I set out here, our City Council is not but merely uses the term to make things sound friendly and beneficial.

Every major suburban site is described as being designed with “garden city principles” with that at Cooting Farm,(p121 onwards) being described as “ a garden community” : yet another undefined term.(“a”) see below It seems that CCC assumes that the use of the term “garden” bestows benevolence on any site.

The Garden City as established as a concept by Ebenezer Howard in 1898 was for self sufficient settlements in the countryside. The “garden” element was largely to achieve food production in “ a garden” around the “city” . It was never meant as a suburban concept, with Hampstead Garden Suburb for all its beauty, being a misnomer from the start.

At that time, the number of persons per household was five. At the end of the LP period it is expected to be about 2.1 , so at the same level of house density only

(a)I do not comment on the Cooting Farm site per se, but would add that in the LP the sites at Adisham p169-172m and Aylesham p 162-167 are all treated separately and yet they go to form one intended, but ill- conceived very muddled whole.

42% of the numbers of persons would be housed in a given number of units compared to 1898.

All the way through the current LP, the proposed new housing areas are described, as at Policy C12 on p.48 figure 2 (b), as “compact”. However the provision of open space, in an attempt to preserve some of the rural character, mitigates against this principle. In this regard the LP is ill founded, attempting to be all things to all people. It is thus incincere and ambiguous in its aims.

The ambience of Welwyn Garden City is a some what questionable nirvana to aim for. It rather denies the virtue of urbanism and produces a suburban density throughout with little contrast.

At least in the early “garden suburbs” (sic) and cities we got a good standard of spatial and building design. One large developer working locally, uses watered down “Arts and Crafts? 1930’s “ design cues, but only on the front elevations not caring that sides and rears, at every turn, are part of the street scene.

At the outset, the Garden City movement had as its financial basis, that land to be developed would be bought at farmland prices. Howard takes considerable time in his book, to provide the figures and the financial rationale for this as a contrast to the high land costs in the existing urban areas.

In its compromised format, the CCC “garden city principles” (sic) only capture part of the uplift in value from farmland to development land. We are not given any figures or percentages to be able to assess the issue. If past planning applications are a guide the information on this issue is not at all transparent.

Only with virtually full land value capture can “affordable housing” be provided at an acceptable cost but the LP is silent on this crucial matter.

The conclusion of this paragraph is that “Garden City Principles”, even if used in their true 1898 meaning, may not be appropriate to the modern world. In any

case the way CCC applies them in the LP is incorrect and misleading. The whole issue needs an open and frank public debate in which it is hoped CCC will engage.

3. ZONING/ SECTORING OF THE CITY POLICY SS4 & C25 PINCH POINTS

3 A As mentioned at 1 C above, the LP misleadingly does not contain a proper reference or plan of the controversial zoning idea, which restricts movement within the City Area. It can only be imagined that it was thought too risky to include. This however is a totally unacceptable approach and illustrates yet again how CCC is not being open with residents. The LP should be augmented by the full inclusion of this, to include a plan at sufficient scale, so that residents can see how they would be affected. It is not adequate to assert that this information is separately available. If it had not need for the local Newspaper this idea may have remained semi hidden.

3B However, again somewhat hidden and camouflaged on p16 at 1., and 2, it is glossed over. The only semi honest part is at 2(f) where it is said that there would be an “implementation of an ANPR-based sectoring system and modal filters to limit cross-city trips.” That is the zoning but cannot be recognized here as such.

3C The zoning/sectoring according to CCC can only be delivered if a complete outer ring/link/ is created. The LP only includes the Eastern Movement Corridor (EMC)and the South West Canterbury link road (SWCLR) both of which are considered below.

3D On p 79 on the LP (page number not shown) at Policy C25 paragraph 2.23 mentions that “ the University of Kent’s landholdings to the north of Canterbury may present an opportunity in the longer term (after 2045?) to deliver improved highway connectivity to the north of the city and facilitate the completion of an outer ring road to compliment the Canterbury Circulation Plan “.

3E Thus, in unclear language, CCC is admitting that the complete “ring road” cannot be promised within the plan period. This is very worrying as the “zoning/sectoring” relies upon its delivery. In the meantime therefore, IF this idea

were to be introduced, it would be dependent upon using existing minor roads in lieu.

3F This is in any case already the case with the idea of using Rough Common Road, upgraded as at Policy SS4 on p 16. This high- handed domineering approach is not acceptable within the LP and in the meantime it has blighted property in that location.

3 E Thus the whole approach to these issues is secretive and unacceptable within a democratic system. Any revised LP must be more open.

3F Within the LP, no attempt is made to identify the existing “pinch points” within the district or to predict where future ones might occur because of the implications of the LP

3G A few might be suggested.

The bus station, said ten years ago by Stagecoach, to be at capacity.

Broad Oak Road and St Stephens roundabout

Nackington Road (see below)

Rough Common Road

Roads through the University of Kent area.

Old Dover Road / Nunnery Fields/ South Canterbury Road

Homersham

Hollow Lane

Further locations within rural areas

3F It is not known whether adjacent Districts have such enormous housing targets. If the population of Kent increased by the same amount that would be an additional 600,000 inhabitants. It is likely that many of them, especially from districts bordering Canterbury would want to access the city

3G The informal predictions in this section are a totally inadequate input and CCC should include a proper analysis in any revised LP. It is a gross omission that this is not already included.

4. CANTERBURY STRATEGIC DEVELOPMENT AREAS

4.A

It is not proposed to comment on all these areas other than as far as my observations above relate. This is not to be taken that they are therefore endorsed.

4.B LAND AT MERTON PARK Policy C6

This site of 99.67 ha (c 250 acres) 0.4 sq mile.(Trying to use measurements people will understand.)

It is a very visually pleasant rural lung to the city, which forms one side of the “saucer” shape, often used to describe the setting of Canterbury. It is a part of the Stour valley and from the built up areas of the city, forms a backdrop of countryside and a setting for the WHS.

Views of the cathedral from Stuppington Lane are surprisingly unspoilt with the existing developed land in the Wincheap area ,as if by magic, not at all dominant. Miraculously, it is like a medieval view that has been delivered to us by fortunate accident. Unfortunately our planners at CCC seem to believe in none of these, for them, over romantic thoughts. On page 33 at their 3(ii) they claim that they will “preserve and enhance views towards the City and World Heritage Site with provision of viewing corridors from open space and PRoWs crossing the site.” A “corridor” implies a very confined unacceptable space, not a landscape setting as exists currently.

They attempt to illustrate these on the map provided on p 30. However three of the indicative “views” arrows seem to be embedded within housing development with no open space to secure the view. Two of them additionally, have the view blocked by what is shown as a “community hub” which we are told will be a “square or village street”. A fourth appears to be more open, being sited within the compromised landscape of a new proposed Park and Ride facility, thus giving a very alien setting.

The current view of the Cathedral , north from Stuppington Lane, of which I attach a photograph, is ignored completely. Earlier, I note that the LP contains no photographs, so its fortunate that any readers of this can see some! It is quite disgraceful that our planners could not take the trouble to produce their own.

Confusingly at the top of p 13 , an area referred to as “Stuppington” is classified as a Local service centre but no other “community hub” is so designated. All the other places so designated are villages. Is it therefore seen as a centre for serving a large adjacent area rather than just for the community (see 1 (iv) on p 3?. If so this implies even more traffic.

At CCC’s 3 (c) (d) (e)(f) (g) (h)p 33, measures are described but of course not drawn, in an attempt to preserve some of the rural character. In each case the caveat “ where possible” seems to apply, so they are totally uncertain and speculative in nature. A developer would probably soon outwit our council regarding these issues.

The topography of the site is mentioned above and the Ordnance /Survey map shows us that the levels fall from the by pass, near its junction with Stuppington Lane, to the edge of the built up area of Wincheap, by 35 metres in a distance of half a kilometre. That is gradient of 1:14 just slightly less than the permitted maximum 1: 12 for residential roads. Housing on this hillside will be overtly prominent and will necessitate invasive alterations to existing ground levels. The kind of visual damage this causes, can be seen on the recently excavated part of the Cockering Farm development, except it seems by our planning staff at CCC.

As if the visual damage caused by developing this site is not enough, the traffic and access implications are even worse and it is impossible to see how they could work.

It is unclear how residents of the 2075 homes are to gain access to them from the Canterbury side. At CCC's 3 (f) p 34, it is blandly stated that they will "provide a transport assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for the use of private cars".

This is a totally unacceptable part of a LP, as it gives rise to doubt and indicates that CCC has no more idea of how to solve the issue than any casual reader of the LP. At CCC's 3(g) they say they will "investigate the downgrading of Stuppington Lane within the site to non motorized /recreational use / access only, in combination with opportunities for similar changes to other historic lanes around the site".

As Stuppington Lane is currently a single track carriageway their ideas have a logic but again are couched in uncertainty. No mention is made of which other lanes might be so altered.

This lane, currently is the only access to the site from South Canterbury Road and it is difficult to see other points where access might be made except nearer to the hospital

In any case South Canterbury Road in the north westerly direction leads to Nunnery Fields with its intrinsic "pinch point" and the already at over capacity junction with the Old Dover Road.

It is noted at CCC's 4(ii) and (e) that the fast bus link, which was part of the Mountfield development, might serve Merton Park but these clauses are ambiguous and thus uncertain. It will be remembered by many residents that the fast bus link was a dubious concept because of the very "pinch point" issues set out above. In the eight year period which the fast bus has been CCC policy, there

is still no route for it from Nackington Road, except through the Chaucer Hospital Car Park and no evidence of that landowner being prepared to deliver it.

Additionally now, we have the proposal that there will be an additional Park and Ride facility for a minimum of 500 cars on the east of the Merton Park site. 3 (d) but again with no indication of how it is to be accessed. To impose that extra traffic on Nackington Road would seem very unsafe in highway terms.

Within the Merton Park site we now have the intended provision of an on and off access to the A2. It will be remembered that a previous plan showed an off slip from London sited at Wincheap, in a format that local people knew was totally unsafe. CCC and KCC ignored those comments but eventually Highways England refused to accept it and the matter was left unresolved. It was to be financed by the developer of part of the Cockering Farm site.

Moving the junction to the Merton Park site gives rise to great uncertainty regarding a delivery date and raises the issue of how traffic, having left the A 2 there, will find its way to Canterbury. That seems to be in part why CCC is proposing the South West Canterbury link road (SWCLR) ,whose devious route can be seen on the maps on pages 28, 30 and 35. Other maps have been produced and shown by CCC showing variations, but their status is not known.

A very noisy residential zone would be created between the existing A2 and the SWCLR.

Providing the new on and off Dover direction slips of course gives only partial access for Merton Park. Traffic has presumably to travel to the new Bridge At interchange and return to go towards London.

None of these highway design maps is of adequate scale to be able to properly assess their viability so it is possible only to speculate about important details. At a meeting with officers they suggested that as the ideas shown were “only indicative” that any problems seen now may not exist.

The public is thus being asked to comment on plans which are vague, maybe incorrect and thus liable to alteration. This thinking seems to pervade many parts of the LP and does not present a responsible realistic document. Again it is unsafe uncertain and it has to be said unprofessional.

Once at the north west edge of the Merton Park site , the SWCLR hits Hollow Lane presumably with a roundabout. The only route from here to Wincheap is through the road known as Hovenden. This is a road built only to residential standards and surely not fit to become in effect an A road?

In the other direction for about 400 metres (no scale shown on the LP drawings) the SWCLR is on the line of Hollow Lane thus destroying its historic character. The first part of it has residential property on one side which will thus be blighted. The route appears to use the existing A2 underpass which is set at 6.3 metres below the A 2 carriageway. The plan then shows it veering south west through the 6.3 M high chalk bank needing a ramp of about 72M in length with visually intrusive embankments and retaining walls.

Photographs of Hollow Lane are attached to illustrate these issues because of course, CCC has not provided any.

Beyond this point the SWCLR takes a devious route through the housing sites but again with no detail shown. If there is any link from the A2 through the housing sites, it is not indicated

Above it is mentioned that CCC wants to take protective measures for “ historic lanes “ around “ Merton Park but not it appears for the most notable one of all, Hollow Lane. At their 4 (i) CCC suggest improve walking and cycling connections ... “via Hollow Lane” , which they appear to want to destroy.

In the Local Plan 2017 a policy T16 states that” rural lanes which are of landscape amenity, nature conservation, historic or archaeological importance WILL be

protected from changes and management practices which would damage their character and where possible be enhanced”.

CCC does not even mention that Hollow Lane is a Saxon “Holloway” or the above policy. Again it appears that CCC has done an inadequate job and has not referred to its own policy. It is likely that the Canterbury Archaeological Trust will comment adversely on the intended damage to Hollow Lane.

Conclusion re the Merton Park Site Policy C6

It will be seen from the above that on the following grounds this site demonstrates no viability.

Very poor and unexplained connectivity.

Visually intrusive and damaging to the setting of the WHS

Poorly conceived and unworkable SWCLR

Grossly unacceptable damage to the historic Hollow Lane

4B LAND TO THE NORTH OF HOLLOW LANE; POLICY C7

The above comments regarding the portion of the SWCLR relate to this site.

It is a very open site of 40.89 ha (102 acres) visible within the country side with no natural screening. There is a very significant unobstructed view of the Cathedral from New House Lane to which attention is not drawn on the map on p 35 but there is mention of the need to “preserve and enhance views towards the City and World Heritage site with provision of viewing corridors....”

As with Merton Park, it is not understood how developing this land assists with these aims.

It is not clear from the inadequate drawings, how the development relates to that currently being built to the north west. It would seem to concentrate too much development at Thanington

4C LAND SOUTH OF LITTLEBOURNE ROAD C12 & LAND SOUTH OF BEKESBOURNE LANE C 13

111.36 ha (278.4 acres) These sites have an unacceptable destructive visual affect upon this major eastern access to Canterbury. They extend well beyond what could be seen as a natural edge of Canterbury and prejudice the current rural access to Bekesbourne. As with many other sites no notice has been taken of the undulating topography especially adjacent to Littlebourne Road.

An enormous input to the sites and to the countryside to the north is the Eastern Movement Corridor.(EMC) It is not clear from the, again inadequate, plans included in the LP how the southern part of this is to be accommodated within the Mountfield development. When this was approved CCC was not very focused on this route and it appeared that no land within it was safeguarded there for it. What we seem to see now, on the plan on p 45, is the EMC carving through the Mountfield site with the, always very perverse, eastern segment now cut off from the main body of the development. This has implications for the division of the community and for road traffic nuisance. This latter is a matter that the LP takes into account on other sites near traffic routes. However the route through Mountfield ,although not seen before, is not actually part of this LP consultation.

CCC needs to make clear what is the route of the EMC through Mountfield and whether it has been legally secured. Many routes further out and even more destructive of the countryside have been casually shown over the past ten years.

Moving on to the route of the EMC north of Mountfield, for about eight years the CCC “area of search” for this was through the golf course and Old Park , both of which formed part of the SSSI. CCC was told of this many times by local groups but remained unmoved. This was in part, because for many years they resolutely argued that an EMC was not a valid route and would not diminish congestion on the ring road. Bizarrely, the same personnel at CCC are now making the opposite case but make no apology for the suddenly changes.

The LP assumes an EMC, but makes no attempt to justify it by any traffic predictions. CCC did more work years ago to prove the opposite.

The “U bend “ route which plunges 0.6 mile into the countryside then goes north through very rural and wooded land.

It finally proceeds west through an attractive partially wooded hillside south of Fordwich.

That level of countryside damage to avoid the SSSI is too high a price to pay. CCC has thus proved that there is no viable route. That realization should be a further input to decrease the number of homes envisaged.

CCC over the years unwisely gave consent for much traffic generating development in the Sturry Road area without any thought as to how it would be served.

4 C CANTERBURY GOLF COURSE POLICY C15

A site on the west of the course of 7.58 ha (19 acres) The shape of this site illustrates why this shape of land is exactly what should not be built on. It has a long exposed periphery of built development and would need a disproportionately large area of road building. In addition it visually prejudices the appearance of the adjacent SSSI and thus should not be included as a housing site.

5 RESIDENTIAL DESIGN: POLICY . SS2 & DM11

CCC ‘S 2 (b) p 251. Many modern homes are built with inadequate spacial standards but it is perverse that only one minimum is contained in the draft LP. “Minimum floor to ceiling height of 2.4 for new build to allow for good daylighting” is requested. This is not well thought out, as good daylighting relates much more to window size, orientation and the “sky component” than to ceiling height.

The ceiling height of 2.4M has been the ubiquitous norm for the last 70 (?) years for no other reason than it is the standard height of a plasterboard sheet .

In terms of creating interesting elevations varying ceiling heights should be encouraged as this is something that just does not occur. Virtually every house at any price or size has a 2.4 M ceiling.

Many period homes commanding prices of over £1 million have some ceiling heights of as little as 2 metres. It is felt that a minimum height of 2.1 M is appropriate for the first floor of a dwelling. It can be argued that the greater the occupancy and /or size a room has the higher should be the ceiling on grounds of ventilation and visual proportion.

If the overall height of dwellings was kept the same, how much more creative and responsive it would be to have a ground floor ceiling of 2.7M and a first floor of 2.1M

If as at Policy SS2 3. Development should :

“be responsive to the distinctive local character and history of the District “
Let us not have the dull uniformity of unthoughtout policy imposing a 2.4 M ceiling height.

Victorian houses often had a 2.7 M ceiling height to allow sufficient space above a hot gas lamp.

In terms of energy saving house design should relate to the orientation of the building and this not be the same no matter which way it faces. Solar gain from facing from S E to SW should be a design factor. This should be an additional policy in SS” p 11

Nicholas Blake 14th January 2022 (final version)