

Parish Council Response to CCC Draft Local Plan to 2045

The Parish Council welcomes the opportunity to comment on the City Council's Draft Local Plan and is relieved to find the proposed additional development for the Herne Bay area is relatively limited considering how much is already planned. There are however several issues that we would like to raise, and these are detailed below.

Development is encroaching on too many open spaces along the coastal corridor. The Parish Council believe that it is vital that key infrastructure be prioritised before housing. The reinstatement of Sturry Park & Ride for the residents of the Herne Bay area should be a priority, alongside much needed improvements to Herne Bay Station. Pressure needs to be applied to Southeastern Trains and Network Rail to implement the latter. In addition, improvement is required regarding the connectivity between the central shopping area, sea front and surrounding areas of Herne Bay.

Much of the content of the local plan, except the housing, is needed now. Hopefully, it will be fulfilled sooner rather than later.

1. Core Principals

The Parish Council agree with all five principals; tackling congestion and air quality, providing high quality affordable housing, improving access to community infrastructure, protecting our valued landscapes, open spaces, habitats and heritage, and facilitating a significant shift towards net-zero. However, the City Council should be more proactive in strengthening its planning conditions on any new planning application with respect to existing significant and notable trees. Too often these trees are later 'blamed' for causing subsidence or a nuisance; or they die because the roots have been covered over with footways or highways. Design of developments can greatly help these trees to thrive.

The Parish Council are fortunate to have the Blean woodland complex within its district. This has largely been protected due to its soil quality, being too poor for agriculture and posing difficulties for development, much of it being on London Clay. However, there is a need to be able to connect different areas of woodland and countryside by making sure that all developments and road schemes create wildlife highways, by planting native hedgerows to link them.

The Parish Council welcomes the CCC Tree Strategy regarding City Council owned trees but would like these principals extended to include all trees within Conservation Areas and all those with Tree Preservation Orders (TPO). It should be a requirement that these principals are applied in respect of any proposed tree works and felling. The Parish Council would welcome more training for planning officers regarding the value of trees, and for them to be more proactive in protecting existing trees with TPOs (only 3 TPOs granted in the whole district in 2021).

2. Movement and Transport Strategy (Policy SS4)

The Parish Council understands the drive to provide better sustainable travel facilities and welcomes the proposed improvements to walking and cycling facilities. It is imperative that

such facilities are well maintained and safe to use (lit where suitable) to encourage their usage. However, it considers that it is unlikely that such a modal shift is achievable, as to travel outside of the city centre or to undertake more distant journeys is very difficult, and in some cases impossible, using public transport. It is naïve to assume that large sectors of the community are ready to give up using personal vehicles. Not all sectors of the community are able to cycle or even walk longer distances, even if time allows. It is also necessary to transport shopping or larger purchases home from retail areas which are often quite a distance away and some items are too bulky to be easily carried.

The enhanced Park and Ride infrastructure would be welcomed, however this is not borne out by the City Council's current strategy of closing the Sturry Road Park and Ride. This is hard to reconcile given the huge amount of development planned to the North of Canterbury, let alone for the existing residents of the coastal towns. The closing of Sturry Road Park & Ride has resulted in restricting movement.

It is difficult to understand how the proposed sectoring strategy can be sustainable given that it will involve much longer car journeys to get from sector to sector than to travel directly. This is particularly relevant when supermarkets or leisure facilities are often in a different sector to housing. It is also of great concern to residents with limited mobility. For example, for anyone whose local shop or doctor's surgery is in a neighbouring zone. It will be very difficult to get to the Marlowe Theatre, or to the Kent & Canterbury Hospital from the Herne side.

The proposed new movement corridor to connect the A28 at Sturry with the A2 at Bridge is welcomed, however closer inspection reveals it to be a single carriageway local distributor road rather than a strategic link. It is also proposed to be constructed as part of various housing allocations therefore its provision will be subject to the unreliability of timely development. A number of these developments do not have to provide this infrastructure until there is, say, 75% occupancy. Such infrastructure should be constructed in advance to prevent unnecessary impact on existing residents, which is especially important given the strategic nature of this link. Provision should be made to ensure there is sufficient room to widen this important link to a dual carriageway in the future, although it would be better and cheaper to construct it as a dual carriageway initially. If the City Council wants to remove through traffic from the City centre it must be bold and provide a better and free flowing alternative in advance of the housing development. An example of this would be the outer Norwich ring road, a dual carriageway constructed in advance of housing development. Norwich is also an attractive Cathedral City which was becoming increasingly congested due to its expansion.

The proposal for the Whitstable Park and Bus scheme (Policy W6) is welcomed as Whitstable is extremely congested at times, particularly summer weekends. If such a facility is provided it is imperative it remains open even if it does run at a loss initially. It will take time for occasional visitors to get used to using it and sufficient signage and incentive must be given to encourage its use.

The proposal for an additional access to the A299 at Chestfield however will be costly and difficult to achieve to suitable standards due to the level differences, topography, land purchase requirements and the proximity of the Chestfield Tunnel. It is unlikely to be cost effective considering it is only proposed to deal with eastbound traffic. Westbound traffic will still have to travel through Chestfield or South Street to access the A299 or to access the proposed development.

3. Canterbury Urban Area Allocations

It is noted that these allocations (C17, C18 and C19) are proposed to be 'car free'. Whilst this aim is understandable, it is questionable if it is realistic as occupiers cannot be prevented from owning a vehicle. If an occupier of these dwellings needs a car to travel out of the City, how will that be accommodated? The proposed parking standards state that such future residents will not be eligible for on-street parking permits unless the development is adding to the stock of on-street parking spaces, which is unlikely. It is most likely that such vehicles will be parked in a location that will cause parking problems elsewhere. It is therefore considered that some limited parking provision should be made for these allocations.

4. Herne Bay Urban Allocations (Policy HB4)

The current and proposed development will greatly impact on education in the Canterbury District.

The Local Plan does not appear to make any state provision for Early Years (EYS), with the current county funded EYS being woefully insufficient.

Six additional primary schools are welcomed, but need to be sited throughout the district, to give parents greater local choice.

The proposed Primary Special School is very much needed, but the siting in the Brooklands Farm development (Policy W5) is not clear. If this school was attached to one of the six new primary schools, this would create better inclusivity and gives the chance of occasional integration in mainstream education. Many parents would welcome the choice of both learning environments helping their child's needs.

The Parish Council is pleased that new secondary school provision is proposed for the area, but it is to be regretted that it is at the expense of the green gap between Herne Bay and Whitstable. As this is also to be eroded from the Chestfield side there will be little gap left between the urban areas. It does seem strange to site two new secondary schools (Policies W8 and HB4) so close to each other, and near an existing secondary school, unless they are to have a different designation, i.e., a high school and a grammar school. The catchment area will be detrimental to the residents of the district and will diminish parental choice, particularly for those on the Thanet side, with pupils still needing to travel out of the area. Pupils from three secondary schools spilling into the local community will create anxiety, with traffic congestion and public transport overwhelmed.

It is regrettable that to enable the provision of a new school it is deemed necessary to build another 150 houses in the area. The secondary schools will be sited in green gap areas that

will also include 'community' development. Schools do NOT need housing around them. Access to these houses is proposed from a potentially dangerous location near a sharp bend and will need careful attention at the design stage to ensure it does not become an additional hazard. The situation is particularly sensitive as children are likely to access the new school from this point coupled with its proximity to a primary school.

5. Altira Business Park (Policy HB8)

It is understood that much of the development on this site has been planned for many years and would seem to be a suitable location for the proposal. The Parish Council is concerned though with the access to it. The existing roundabout on Margate Road has a limited capacity due to its size and is located close to the Thanet Way. Once there is much increased usage of this access there is a danger that traffic will back up onto the Thanet Way at peak times causing an unacceptable hazard. It should be borne in mind that once the Hillborough development is constructed many residents are likely to use this access as well. When this roundabout was originally constructed there was an understanding that it would only serve the initial phase of the Altira development and that a much larger roundabout with a greater capacity would need to be constructed to serve later stages if they were to proceed. It is therefore essential that the design of this junction is revisited to take account of the greatly increased potential traffic flows. It is accepted that there was some tweaking of this junction when Sainsbury's was constructed, but there will be much greater usage in the future, particularly at peak times.

The policy states there will be improved walking and cycle connections to the railway station via Talmead Road and Parsonage Road. There is no access to Parsonage Road or Public Right Of Way as Parsonage Road is a private street, therefore, this route is not possible. The only routes available are far longer than implied and are unlikely to be frequently used.

6. Housing Mix (Policy DS2)

The Parish Council welcomes the inclusion of bungalows; properties suitable for older residents and wheelchair users (M4(3)), in the proposed housing mix as these are a housing type that has been non-existent in recent developments. It is requested that consideration be given to some form of restriction being placed on such properties to prevent future conversions and extensions that erode the supply of such housing stock.

7. Business and employment areas (Policy DS8)

The Parish Council notes that there is a lack of any major industrial development or plan to attract a major employer to the district. The only possibility for any large employment opportunities would be outside the district with the proposed development of Manston Airport as a freight hub. In addition to the airline handling and aircraft movements there would be a development of warehousing and transport companies, and some other industrial development with air transport needs.

There has been an exodus of major retailers from Canterbury City centre, with people preferring to travel outside the district to somewhere like Westwood Cross or Bluewater,

where there is a greater range of shops and free parking. The high level of student accommodation in Canterbury does not help.

8. Local Centres (Policy DS10)

The Parish Council would like to see improvements made to the Local Centre at Hawe Farm Way, in Broomfield, which requires enhancement to improve its appearance. Planters would greatly improve the street scene.

9. Highways and Parking (Policy DS15)

The inclusion of EV charging requirements is welcomed and will hopefully be encouraged prior to the adoption of this local plan.

The Parish Council is concerned that several developers of large sites are not proposing to put forward roads (and therefore highway drainage) within their developments for adoption by the Highways Authority. The proposal is that they should instead be maintained by a management company along with green spaces. Such maintenance will result in the burden of additional ongoing charges upon householders within the developments, which are unregulated. Not only is this seen as a form of double taxation but could also, ultimately, lead to a drop in the standard of construction and maintenance. The Parish Council requests that this practice is discouraged by means of suitable clauses within the Highways and Parking Policy of the new Local Plan. If such roads are not adopted it would also impact on parking regulation, should it be required in the future.

10. Air Quality (Policy DS16)

The village of Herne is an Air Quality Management Area, with high pollution recorded. It is said that the on-going road widening at Bullockstone Road should help alleviate the amount of traffic going through the village. However, the so-called spine road proposed to go through the middle of the Strode Farm development is unlikely to be completed for several years yet and in the meantime other nearby developments have also been given planning permission. Mitigation measures need to be taken now in the form of tree and hedge planting near the entrance of the village on Home Farm and at Goldspots – Curtis Wood Park.

11. Habitats, landscapes & sites of local importance (Policy DS19)

The Parish Council agree that adequate mitigation and compensation measures and an implementation plan should be agreed with the City Council. The City Council will use appropriate mechanisms to ensure any mitigation or compensation measures are secured and delivered.

The Parish Council would further like to see added to this policy, that not only are the measures secured and delivered but that they are safeguarded into the future.

12. Renewable Energy & Carbon Sequestration (Policy DS25)

The Parish Council generally supports this policy. All new home and business development should include high standards of insulation and be fitted with solar thermal and PV, plus

heat pumps. This policy should go hand in hand with promoting the benefits to the public, particularly any larger scale renewable schemes.