

From: C Brown

Sent: 16 January 2023 11:54

To: CCC Planning

Subject: Local Plan Consultation : Draft Canterbury District Local Plan to2045 : Part 1 of 3

Dear Canterbury City Council

I have the following comments and observations on the above Draft Local Plan using your headings which have been shown in bold.

Contents (page 2)

1. Under "Spatial Strategy for the district" I suggest that the list of policies included in the Draft should be given, stating whether they are strategic or local. (NPPF Paragraph 21)

2. In addition, I also suggest that it would assist readers to add the list of the Appendices included in the Draft as follows:

"Appendix 1: Saved Policies from 2017 Local Plan"

"Appendix 2: Glossary"

"Appendix 3: Commuted sums calculator"

"Appendix 4: Parking standards"

Introduction and consultation (page 3)

3. Paragraph 4 advises that: "national policies have increased the level of housing growth the government expects in our district,". However, matters have since changed following the PM's statement at a PMQs in November 2022 that the Government is "...committed to making home ownership a reality for a new generation, and we must build homes in the right places, where people want to live and work...but I want those decisions to be taken locally, with greater say for local communities rather than distant bureaucrats."

4. More recently, during "Levelling Up, Housing Communities" questions held on the 9th January 2023, Lucy Frazer (LUHC Minister) in answer to a question from Matthew Pennycook concerning "The Government's decision to signal the end of enforceable local house building targets...?" responded "The simple fact is that under the present system, too few local authorities have local plans, because people do not want development in their area. Through the Bill, we are seeking to ensure that communities have a say on their local plan so that those plans are passed within the 30 month time limit that we have set out in the Bill." I understand that the NPPF is currently under consultation, ending on the 02 March 2023.

5. Given the above, it would be helpful to know the City Council's position on the Government's signalled change from mandatory to advisory housing targets and if relevant, are any changes in the size and delivery of the strategic housing or other sites proposed?

1.Spatial strategy for the district

6. First paragraph: query population figure of 157,400. Bearing in mind the University population in Canterbury, does this figure represent the total population or household population?

7. Paragraph 1.1: The first sentence refers Canterbury's "...internationally regarded heritage, including the UNESCO World Heritage Site." Just to mention, the city has three UNESCO World

Heritage sites within its boundary, one of which is Canterbury Cathedral. With respect to the second sentence, I think that Canterbury is served by the Javelin rail service and not HS1?

8. Paragraph 1.4: Please refer to my comments in paragraph 4 above.

9. Paragraph 1.5: The adopted 2017 Local Plan utilised many green field areas for the strategic sites, including within the coastal strip of Whitstable and Herne Bay, Duncan Down north of Thanet Way, Land south of Ridgeway, Greenhill, Strode Farm and Herne Bay Golf course. All of these sites are now under construction involving about 2620 houses, some sites being more advanced than others.

10. With respect to the Draft, further green field sites are proposed in the coastal strip including at Duncan Down south of Thanet Way (Policy W6), Golden Hill (Policy W7) also south of Thanet Way, Brooklands Farm (Policy W5), Bodkin Farm (Policy W8) and Thornden Wood Road (Policy HB4) which is adjacent to Green Hill. In short, much of the strategic housing development on the coastal strip in the 2017 Local Plan and current Draft has been on green field land with development gradually moving southwards from the sea to the A299 and beyond in the case of Strode Farm. However if this is continued in the Draft it could potentially coalesce the communities of Whitstable and Herne Bay, if not now, at some time in the near future. I suggest that NPPF 2021 Section 11 "Making effective use of land" is relevant here.

Vision for the district to 2045 (page 6)

A strong and resilient economy

11. The first sentence opens with the vision that by 2045, the district will be stronger and more resilient thanks to the grow and development of the Kent and Canterbury universities, offering highly-skilled jobs in areas like science and technology, plus a strong medical sector. This seems to place a huge responsibility on this sector and does not seem to consider the potential growth and development of the commercial sector which is also encouraged in the Draft plan.

12. The second sentence relates to the continued attraction of business investors to the district because of its connections to London and the Continent, with new and diverse jobs for local people. I would suggest that potential investors are seeking more than just appropriate connections but many other aspects including the availability of suitable premises, HS broadband connection, convenient access to the major highway network plus the local availability of a suitably qualified workforce. It is the latter aspect which may require the possible up-skilling of the existing workforce in order to meet the demands of the highly-skilled jobs of the digital age.

Improved connectivity

13. The second sentence mentions investment in digital infrastructure and walking and cycling routes to improve air quality among other benefits. With respect to walking and cycling, the Government issued a press notice on the 2nd January 2023, launching a £32.9m to enable Local Authorities to develop local walking and cycling schemes with a view to achieving the Government's goal of 50% of all journeys in towns and cities being walked or cycled by 2030. I suggest that the Draft vision for the district will need to be strengthened to achieve the 2030 target.

14. "Improved connectivity" is the only "Vision" of the four to mention visitors. I suggest that visitors are an important element of the district's economy and consideration should be given to including their needs under the other three sub-headings.

Healthy communities

15. The first sentence advises that "Existing communities will be enhanced...." but it does not go on to describe what is to be enhanced or how this will be achieved. I suggest that as a general principal, enhancement should include the reto-fitting of the existing housing stock to the same standards as those required for new properties, where this is both practical and financially viable.

16. There is no mention of need to provide adequate primary or secondary education facilities within the "Vision". I suggest that to accompany the reference to "A range of homes will meet the needs of the district,..." it is added here.

A thriving environment

17. The final sentence refers to the investment in our water environment which is welcomed in view of the recent sewage discharges into the sea near Tankerton among other locations. I understand from a leaflet recently circulated by Southern Water that they are planning various improvements and upgrades at Canterbury, Swalecliffe and Herne Bay to alleviate such discharges among other proposed treatments.

18. Another factor affecting the quality of our rivers and coastal waters is the run-off from farm land. No doubt this is considered in your environmental assessments.

Strategic objectives for the district

19. Suggest amend objectives to take on board above comments on "Vision for the district to 2045" as appropriate.

Map of District (page 8)

20. The map is of a very small scale (not defined) and as a result it is difficult to identify some of the policy areas: suggest compare with adopted 2017 LP Key Diagram page 10. For example, the map shows two very small light red patches which indicate "Proposed new school sites" in the Herne Bay - Whitstable Green Gap located near the A2990 and these sites are surrounded on three sides by grey shading which indicates "Urban area allocations". The light red patches relate to Policies HB4 and W8 respectively which propose not only new schools but also other development including 150 houses (HB4) and 250 houses (W8).

21. The proposed housing areas for HB4 and W8 are shown in grey. However other similarly sized housing sites such as W6 (270 houses) and W7 (120 houses) south of the A2990 Thanet Way at Duncan Down, are shown in blue ie "Strategic allocations"? In addition, the proposed development site at Brooklands Farm (W5) also includes a new school which does not appear to have been shown on the district map. I have not checked whether there are any other similar issues on the district map.

22. In short, it is disappointing that the supporting drawings for the Draft Local Plan to 2045 proposals have not been supplied to the same level of detail as those supplied for the Publication Draft of June 2014.

Regards

C S Brown

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