

## **Response to focused Topic 18 Consultaion Canterbury City Council proposed Local District Plan.**

I have reviewed the revisions submitted in this Focused Regulation 18 Topic Paper consultation. I question the viability and deliverability of several of the proposed sites and believe therefore that the current proposals make the Plan unsound and should not be adopted. The proposed sites fail to meet NPPF conditions and are counter to existing Plan designation and Council policies. The proposed Plan revisions now focus development on the southern and eastern side of the city where there already are several existing large development sites. There is no explanation for the removal of the large Blean development or why no housing is now proposed in this area putting additional development strain on other areas.

No proper consideration of the new sites has been made in relation to assessment of the impact on existing infrastructure given the concentration of proposed development. The overall effect of the proposals will cause severe transport problems as access and impact have not been properly considered in relation to current and planned proposals and lack of improvements to existing transport infrastructure – especially along the A257, Spring Lane and Barton areas and Wincheap. Finally, the proposals remove improve access to important green space for residents in an area with very limited open green space. It is a shame that more effort has not been made by the Council to proactively identify more Brownfield sites or explore how to develop existing designated sites and new ones with an approach that leads to higher dwelling densities while maintaining good design standards. I am also surprised by the assertions suggesting that proposed mitigations will be sufficient to offset any negative issues for existing Canterbury residents and new ones. The proposals in the revisions to the draft Plan run counter to local Council policies and to several key elements of the National Planning Policy Framework.

As usual little attention is paid as to whether the new development will cause detriment to health and care services. Given that Canterbury already suffers the problem of having much higher-than-average number of patients per GP and staff shortages in local health and care services that there are existing problems for the current population and the substantial increase in new residents will have a major detrimental effect. The Sustainability appraisal notes that the proposals for development could cumulatively place pressure on key services and facilities. It references the need for mitigation, but none is included in the revised or original plan. Only facilities – not staff – are planned. NHS data also shows that practice staff in Kent are older than the national average and closer to retirement. Additional population on the scale proposed will lead to exacerbating problems currently experienced by residents. This will be a major detriment to existing and new residents and detriment to existing and new residents is an NPPF assessment requirement.

I strongly object to developments identified in policies N1, N4, N5 and N6 and to N3 which promote new or revised development sites. All these policies will increase traffic in inappropriate locations and lead to unjustified loss of green and recreation areas for people living in South Canterbury and Thanington. There is no mitigation that can address this and is

contrary to the Council's own policies such as its Green Space strategy and current plan the area is shown as protected open space.

Policies N1, N3, N4-6 will lead to significant loss of biodiversity. These policies seem to be aimed at removing access to green space, loss of recreational areas in an area with extremely limited access to green space. They will increase pollution and traffic congestion. Housing development in N1, N4-6 will not be sustainable in terms of wastewater. Suggested new wastewater plants as mitigation are flawed. Already the Mountfield development is seeking alternatives to constructing a wastewater plant as this is not considered a viable option. The Council should put strict conditions regarding wastewater in place and rigorously enforce this – a condition requiring adequate treatment for wastewater being in place before the first dwelling is occupied put in place by Wealden Council has been upheld by the Planning Inspector at appeal.

The proposals are also put forward without any revision of the transport plan despite the significant impacts the proposals will have on the transport infrastructure. These developments will have significant negative effects. Policy N3 is deeply flawed for many reasons. Where is the analysis of highways impacts. It is a policy developed because of poor approaches to previous planning decisions regarding the A2 slip road. The policy appears to be developed out of desperation to replace lost P&R space. So, the result is that cars exiting eastwards from the A2 will need to go up to the A28 junction and then travel away from Canterbury through the A2 junction to a new P&R site. This is clearly poor vehicle management and will increase congestion at a point at which vehicles from the Merton Park site will be joining the A28. Access to the new site (not detailed) will also require new junction controls in an area where there are already numerous traffic light-controlled junctions.

It is also suggested that the recreation facilities in N1 are a replacement for those to be developed in N3 despite these being well over a mile from Thanington and will not provide local amenity for Thanington residents. To remove the only significant green space in this socio-economically deprived area is counter to all plan principles. From an environmental perspective it is not only the loss of green space and recreation but potential negative effects on the river Stour, a nationally important chalk stream.

Is the capacity proposed really justified given the drop in P&R use? It would make more sense to direct visitors to the New Dover Road P&R, which will have additional capacity, or retain part of the P&R at the current site and add additional P&R capacity further along the A 28 to the city boundary to remove cars along the A28 in Thanington. Ultimately though, The loss of the playing field cannot be justified in this location and the proposal is counter to the NPPF paragraph 98 and current Council policy. Policy N3 should be withdrawn.

Developments in policies N4-6 were previously rejected as inappropriate for development but with the Council now removing the Blean site have brought back in simply to meet housing targets. All previous reasons for rejecting these sites still stand with part of this allocation deemed in the current local plan as an area of high landscape value (Adopted Local Plan 2017). The site was assessed as in the SLAA (2022) and "... considered technically

unsuitable for the development use proposed due to concerns regarding the ability to provide suitable access, and being located in an area with limited access to day-to-day services." Proposed mitigation only relates to changes in transport rather than wider access issues to services and does not, therefore, reduce the overall negative impact of these sites. The conditions regarding the new distributor road and bridge over the railway are unclear and appear in terms of the delivery plan only to be linked to build-out targets for site N5. The strategy appears to be to create a P&R site to solve traffic issues without consideration of both the negative traffic generating effects of P&R sites, impact on public transport etc and assessment in relation to overall traffic management in and around Canterbury. P&R impacts cannot be seen in isolation of individual development sites.

Merton Park (policy N1) as now conceived is poorly thought through. The proposed access is inappropriate and will lead to increased congestion – especially on the A28 – given proposals for the A2 slip road. The Sustainability Assessment notes that KCC Highways consider the new proposed access points to be adequate. It is not clear whether this has been assessed in conjunction with the impact of the new A2 slip road to the A28 and moving of the existing P&R, and proposed development in Thanington. Also, the suggested access points exit onto narrow roads in an area that is already congested areas. The A28 is already overburdened. Traffic from this site going through Canterbury will need to follow the new proposed gyratory system adding to key flow problems at Cow Lane as well where Simmonds Road rejoins Wincheap. Access via Hollow Lane and Homersham Road seem ill thought through and certainly Hollow Lane is not suitable for additional traffic.

The area is also identified in the last LDP as an area of high landscape value and therefore proposing large scale development in this area requires substantial consideration of such an impact on this important landscape with rich biodiversity. The site should conform to a much higher standard of assessment, but this does not appear to be addressed in the Sustainability Assessment. The area is also a major recreational asset for people living in South Canterbury where access to open space is extremely limited. This will have a huge detriment to local residents.

Policy N4 requires the expansion of road networks through the construction of a distributor Road linking the A257 and A2. This is likely to increase traffic levels overall in addition to that generated through the developments on the Mountfield development and that proposed in policy N4, Studies suggest new roads increase road traffic by 2% or more. There may be some positive effects on traffic on St Martins Hill (A257). This is likely to remain a bottleneck. The bus gate to the Spring Lane estate is welcome if such extensive development proceeds.

There are other negative impacts of policy N4 including loss of biodiversity, restricting current access to green space etc. The Sustainability assessment wrongly states that there are positive and negative benefits on air pollution, biodiversity and climate change. Taking the development overall the cumulative effect of development is bound to be negative through loss of green space, loss of biodiversity. Assessment of biodiversity should extend well beyond the actual development site as many bird and animal species up to 500 meters from the site will be adversely affected.

The proposed development of the former Canterbury City Council offices and car park suggests the development of flats. On this site a three-story development would be suitable or stepped design given the site is not adjacent to current housing. On 2 hectares a central urban location might expect 250-300 dwellings of mixed size but certainly more than 200. To allow landscaping/green space on site. A recent report by CPRE London identifies approaches to increasing dwelling density while delivering high quality housing suggesting local authorities can aspire to 100+ dwellings per hectare as an urban brownfield standard ([https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded\\_1.pdf](https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded_1.pdf))

The absence of an updated Transport Strategy is a key problem. The Sustainability Appraisal notes (para 5.2.8) “... *mixed significant positive and negative effects were identified with regards to sustainable transport (SA Objective 13) for all options. **This reflects that growth at the levels envisaged would increase pressure on the road network and public transport infrastructure.** However, the growth **could also** stimulate greater investment in public transport across the district.*” The removal of the large housing allocation at Blean and reinserted development between the A257 and the railway on them opposite side of the city and expansion of proposals for Merton Park will have significant transport implications and these need to be addressed in a revised strategy given the significant uncertainties about highways infrastructure- both existing and proposed.

Commitments to P&R, a new distributor road connecting the A257 and A2 were not part of the original transport strategy or highways appraisal, and the Eastern Bypass is abandoned. The Council is adopting a piecemeal P&R strategy which is not supported by the existing evidence of current use or by wider evidence in the implementation of P&R facilities. Without updated data on trip purposes the P&R approach will fail. Key reasons for congestion are related to accessing education facilities in Canterbury, which will not be particularly impacted by P&R facilities. P&R is more likely to work where other transport alternatives do not exist (e.g. rail corridors) and are close to major highways networks (e.g. A2). Routes need to be linked into the wider public transport network rather than simply having dedicated P&R routes to maximise passenger use (see Oxford and Norwich for example).

The approach here seems to be to fix individual site issues in isolation from an overall comprehensive transport strategy. The Council needs to bear in mind that P&R has a negative public transport shift impact where these other public transport alternatives exist. It is unlikely to address key congestion periods given that much traffic is local (e.g. school runs) travelling across Canterbury – exacerbated by the lack of through bus routes. Experience with, for example, requirements for the new A2 slip road and the Sturry bypass demonstrate key delivery issues so there is additional reliance on the piecemeal approach adopted in this revision and it is unlikely to produce sufficient positive benefits.

These sites score poorly in the Sustainability Assessment on most SA objectives except housing provision and economy (although this assessment is also open to challenge). For some reason the Sustainability Assessment also rates them positive for healthy communities (Objective 14 despite the earlier negative or neutral assessments. As such the proposed sites

are counter to several city council policies on green space and recreation, principles of a pedestrian led transport strategy and key NPPF policy (Paras: 8b, 8c; 16, 97-99, 103 and 109). The proposed plan lacks an applicable transport strategy, fails to maintain green space, does not support new and existing communities and its deliverability is questionable. It lacks clear policies relating to infrastructure improvements and it is unlikely that the limited proposed mitigation will result in providing adequate protection to significant detrimental effects to traffic, environment and biodiversity and supporting the health and wellbeing of existing and new residents.

There is no specific focus on addressing wastewater (and future water demands on the current water provision and wastewater infrastructure. Increasingly dry periods are leading to strains on the water infrastructure with no real assessment of cumulative assessment of development across areas and development drawing on the Stour basin. Wastewater is also a key problem with Stodmarsh lakes and the river Stour at risk and more needs to be done to address nutrient neutrality, especially given the problems arising for the South Canterbury Urban extension's inability to provide on-site wastewater treatment. The District Plan should contain a requirement similar to that applied by Wealden Council and supported by the Planning Inspectorate to require waste water treatment to be sorted out prior to first occupancy (<https://www.wealden.gov.uk/news/wealden-wins-legal-victory-to-prevent-sewage-pollution-at-new-development/>)

In conclusion the proposed Topic 18 revision is unsound and therefore currently means the proposed LDP is unsound. Substantial additional changes are required along with stricter adherence to current Council policies and the NPPF and the provision of relevant revised strategies such as the transport strategy.

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