

RESPONSE TO PUBLIC CONSULTATION ON CANTERBURY LOCAL PLAN (Regulation 19)

From the CANTERBURY ALLIANCE FOR SUSTAINABLE TRANSPORT

In the Local Plan which Canterbury City Council will be submitting to the Secretary of State there is provision for giving permission for 23,085 new dwellings. In 2019 the Highways Authority, currently Kent County Council, commissioned a study of the A28/ring-road in Canterbury by Sweco, a traffic consultancy firm. The report, which was published in 2019, stated that, given the number of dwellings allowed under the 2017 Local Plan, amongst those the 4,000 -houses in Mountfield Park, adjoining the built-up area of Canterbury, the road network in urban Canterbury was at or near capacity, and that 'doing nothing was not an option'.

As the National Planning Policy Framework prescribes, 'development should only be prevented or refused on highways grounds if...the residual cumulative impacts on the road network, following mitigation, would be severe'.

The City Council has accepted that if no mitigation is applied then the residual cumulative impact on the road network would be severe. That is why they have commissioned a 'Transport Strategy', and a 'Bus Strategy', and listed measures which they say will achieve a modal shift, from single use of cars and vans to use of buses and active travel.

However, our contention is that these Strategies do not go far enough to ensure to ensure that the capacity of the road network in the urban Canterbury area is sufficient to prevent ever-increasing and costly congestion

- The figures beyond the current date are, of course, targets, not actual measurements of modal shift.
- The measures which the Council concede may have to be taken are divided into 'short-term', 'medium-term', and 'long-term'. However, these are not statements of intent, backed by arranged funding. They are 'what we would have to consider if congestion grows to an unacceptable level'. There is no mention of triggers which might initiate planning of these measures. Importantly also there is no firm indication of who would pay for the work. The KCC as Highways Authority is under severe financial pressure, and Stagecoach is a cautious commercial enterprise which has to make a profit. That leaves developers, via Section 106, or Community Infrastructure Levy, to pay for these measures. However, the record of developers in this district in terms of reaching the level of housebuilding allowed, and reaching the trigger-point at which they have to pay for certain measures, is not good. Given the importance the Government places on its policy of achieving

1,500,000 new dwellings by 2029, they might well put pressure on builders to build the number of houses for which they have permission. However, that is likely to produce a situation where developers will turn to the planning authority and say 'we cannot afford to pay for the measures which you have imposed on us '.

- Many people come into the centre of the urban area of Canterbury to access their workplace, to shop, to sightsee. The Bus Station is located on the edge of the old City, and all services, normal bus routes and Park and Ride, begin and end there . However, there are many destinations in the urban area for those who live outside, or live in one part and need to access another part of it: schools, colleges, hospital, health centres, workplace, business parks. In order to substantially reduce the number of journeys made by car, there is a need for a comprehensive 'hopper bus' service across the urban area. We note with approval the inclusion of a 'hopper bus service' in 'short-term' measures in the Transport/Bus Strategies. However, there is no indication as to which agency will pay, nor whether the service is informed by careful research of the journeys people actually make.. Again, it looks like an item on a wish-list, rather than a firm intention.
- Stagecoach is at present under criticism from the general public, for reasons of cost, frequency ,punctuality, nearness to origin /destination, information in real time of real location of timetabled bus, quality of ride, and personal safety. It is unlikely that there will be a modal shift without the measures listed in the Transport Strategy . In its response to this Strategy Kent County Council says "The routes identified in para.2.9 as congestion hot-spots are likely to see higher levels of congestion with the removal of road space and introduction of bus priority road measures without a significant shift in mode share...we would not support a strategy that is likely to cause more congestion and would affect both private vehicles and buses that would be caught in the same queues." In other words, the Highways and Transport Authority are not going to implement bus lanes until effective measures to reduce journeys by car are implemented ; and we argue that the measures published are not intentions but items on a wish-list.
- There is a statement in the Transport Strategy that the City Council intends to remove 10% of its city-centre car-parks in order to bear down on the numbers of people accessing the city by car. However, Kent County Council, as Transport Authority , in its response to the Transport and Bus Strategies, said in 2025 that in order to achieve the necessary take-up of Park and Ride and the necessary reduction in car-journeys the City Council would have to eliminate all car-parks in the city centre.
- The fact that in tandem with the Transport Strategy a Bus Strategy is also accompanying the draft Local Plan emphasises the fact that the City Council is emphasising that bus services , including Park and Ride, will be the main focus of trying to reduce use of private cars across the urban area. However,

Active Travel(bicycling , walking) plays its part. Walking , in fact, is targeted to reach 20% of journeys to work , compared with 14.7% in 2011. An important stimulus to this increase is considered to be the signalisation of the Wincheap, Riding Gate, and St George's roundabouts, and the elimination of the need to go underground along the tunnels. This is indeed on a wish-list--- but not costed and allocated firmly to one agency. Again a 20mph limit for vehicles on streets in the urban area would help to increase the number of people making their journey on foot.

So far as cycling is concerned , there is again a desire in the Transport Strategy to increase the number of people cycling rather than travelling by car to work. SPOKES has many proposals for improvement for cycle routes in its 'Wish List' . However, signalisation of crossing points at the above roundabouts, and 'making-safe ' of cycle routes to the secondary schools in the urban area of Canterbury are the measures we think necessary to increase the number of people making their journeys by bicycle.

- The Mountfield Park development , which was featured in the 2017 Local Plan and was approved in principle by Canterbury City Council as planning authority ten years ago has not yet started. We make the point that , given that this project contains important measures which are planned to increase the number of residents using bus or bicycle instead of car , should develop to prove the effectiveness of the measures before any new development in this draft Local Plan is allowed.

. COMMENTS ON THE TRAFFIC IMPLICATIONS OF C 15, 16 AND
17, DEVELOPMENTS ALONG LITTLEBOURNE ROAD AND BEKESBOURNE
LANE, AND MERTON PARK C 10

The Merton Park drivers would exit with difficulty from their estate, debouching onto Hollow Lane, Stuppington Lane, narrow country lanes, or Nackington Road. Some would then head for Ashford or along the A2. Most would have to face the A28 through Wincheap.

In the developments towards Littlebourne we calculate that 600 would be driving private cars out of the 4 developments in the space of two hours. That will be augmented at that time by people driving their sons and daughters to school. On its way there would be considerable temptation to avoid the inevitable congestion by diverting along residential roads such as Warwick Road, Spring Lane, Pilgrims Way, Barton Road, and St Augustine's Road, and the narrow, part-residential Stodmarsh Road leading to the village of Fordwich and the A28.

The proposal for a Park and Ride site along the A257 favours those who wish to go into the city centre, but it is of little use to those residents of the new developments who wish to go to the hospital, or secondary school, or to the business estates that are in Wincheap or down the Sturry Road, in the current state of bus services.

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We submit therefore that the Local Plan is not sound because it fails to spell out exactly how the Plan would tackle the severity of the traffic problems that would arise from the numbers of houses to be built.

CANTERBURY ALLIANCE FOR SUSTAINABLE TRANSPORT

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