

Response to Local Plan consultation

Comments on each section as marked

- a) Centering growth on Canterbury misunderstands the nature of the city. Canterbury is a small city, almost an overgrown village, with distinct sub communities. The current Local Plan seeks to increase the number of dwellings in the city by some 40%, placing huge housing estates on the urban fringes and into the villages immediately to the east. These will in no way be self sustaining and will inevitably bring considerable extra people movement along the A28 and the feeder roads to it. These are already over capacity. Modal shift is an unproven aspiration. It certainly does not work from (eg Sturry) which is on the flat with a cycle path. We have yet to see the impact of the current Local Plan as virtually no houses have yet been built. There have been, and still are, considerable doubts about the sense of the current plan. To add yet more housing to the urban fringe is folly. It would effectively double the size of the city to produce a bypass, that would not deal with the extra traffic seeking Canterbury as a destination to meet shopping, social, medical educational needs. This so called preferred option will destroy Canterbury's unique selling point – its heritage assets, threaten its historic built environment and will not mean a healthy community. It will not achieve good connectivity and will concentrate any economic benefit on the population area least in need of such benefit.
- b) This is motherhood and apple pie. Nobody could disagree these objectives which are simply designed to elicit a positive response. The question is how, realistically, can they be achieved?
- c) The objective here seems to be all about growth. I am not convinced that growth is wanted or is an environmentally sound objective. Exploiting the heritage asset is a wrong assumption. We should be seeking to preserve and enhance. That may mean simple things like good housekeeping (removing litter, graffiti, A frames, poor shop fronts, inappropriate paving repairs etc). I question the need for new events, festivals etc or the need for enhanced digital infrastructure if we cannot get the basics right. However, agree bullet points 2,3,5,6,7.
- d) Largely agree. However, Herne Bay is our most economically deprived urban area. If more development is seen as an economic stimulus then

growth should be concentrated on Herne Bay. The town should also be a centre for business growth.

- e) Largely agree. However, we need to seriously consider pedestrianizing the High Street. We need to address the conflict of second home owners and Air B&B with local people, accepting the huge economic benefit tourism brings.
- f) The particular need is for social housing. We must use the Local Plan to deliver this and address our housing waiting list.
- g) We need to identify appropriate sites, not let developers dictate where we should build. There should be a proper series of town plans or an overall strategic plan for land use across the district (probably in consort with neighbouring districts). Individual sites should be considered where particularly appropriate needs can be met. Eg the area round the West Station should not be used for PBSA or old persons flats but for high end commuters. Spaces above shops can often also be high end accommodation. The Wincheap Estate can be redeveloped in line with the Wincheap 2020 Vision document.
- h) We must recognise that some village settlements will benefit from more housing (to support a school/shop/bus route etc). Such housing may be car dependent to some degree and thus less sustainable but large housing estates on the urban fringes are not sustainable anyway.
- i) Parish plans and neighbourhood plans should help with this as should charrettes if done correctly.
- j) Support HNC3B. Wincheap Estate could be developed along the lines set out in the Wincheap 2020 Vision.
- k) There is no reason why some industrial sites, particularly warehousing sites, could not be redeveloped with offices above, or even, in some cases, housing above.
- l) Density should be determined on a site by site basis considering both the immediate area distinctiveness and local needs.
- m) In some smaller settlements less than 11 units may be appropriate, accepting this may not produce affordable housing. Parish and neighbourhood plans should be considered.
- n) Social and community infrastructure will most likely be viable only on larger developments. We should aim to make local facilities available by building on garden city or 15 minute city principles.

- o) It is likely that genuinely sustainable communities will only be achievable with much larger developments. Hence a new town/garden city approach with a new settlement must be considered, probably with one of our neighbouring authorities. Government housing statistics need investigation in the light of the report from the Office of Statistical Regulation report on university cities. If the housing numbers being considered are justified then we must look seriously at a new settlement or settlements together with our neighbouring authorities along new town/garden city lines. Ebbsfleet have done this for 15,000 dwellings and have obtained £530m in central government funding for infrastructure improvements. We should consider doing the same. A new settlement of 15-20,000 dwellings is likely to be the minimum size that would offer a genuine range of sustainable local facilities. Given the housing numbers in addition to the existing Local Plan numbers this is the only realistic way forward.
- p) Most of the current strategic sites have been split between different developers in competition with each other and thus seeking individual uncoordinated competitive design approaches. This results in the impossibility of community planning or a consistent design approach. We must take control of masterplan design.
- q) The principal problem with the current approach is the absence of masterplanning. For example in Wincheap we have had multiple and separate unrelated applications for a 4th A2 slip road, a 2 way Dover off slip/site access road, a weak masterplan for the 1150 dwelling Thanington site, subsequent outline and detailed consents for that site being split into 3 by competing developers who will not cooperate with one another, a plan for a Park and Ride extension and, yet to come, a plan for a Wincheap relief road. All these plans have been ill coordinated with no masterplan and each building on or trying to sidestep the problems caused by the other.
- r) This is a government requirement and is likely to be more rigorously applied over the timescale of this plan. New technology will doubtless assist in delivering this. Dwellings have been built to this standard for years on much of Europe, often more cheaply, by using different building techniques (often prefabricated or factory building). It is inexcusable that in the last 2 years we have granted consents for 000's

of dwellings which will need extensive and expensive retrofitting within the next 20-30 years to meet known government standards.

- s) Extensive retraining of the UK housebuilding industry, preferably conducted using German, Dutch or Scandinavian techniques.
- t) Agree but gas boilers might be replaced by a variety of other methods, electric, solar, improved insulation etc. The BedZED scheme is now 20 years old!
- u) Need to consider carbon footprint of all new buildings and the possibility of refurbishing and recycling existing buildings (see report from CCAP)
- v) SUDS and rainwater harvesting should be standard on all developments of 10 dwellings or more unless good reason can be shown otherwise.
- w) Completely agree!
- x) Agree. Range of needs to be considered from simple things like lift access and absence of steps/cills to wetrooms, semi sheltered, warden assisted etc. Needs input/consultation with NHS and Social Services.
- y) Agree
- z) The present Local Plan has encouraged privately built PBSA largely on inner city sites which could and should have been used for housing (Former Peugeot Garage, United Dairies depot, Barratts, Kingmead, New and Old Dover roads etc). Student accommodation should be concentrated on campus or close to campus or fringe of city given that students are more likely to be able to walk/cycle than families with young children or the elderly.
- aa) Agree.
- bb) Agree.
- cc) Agree. However, the new hospital should, and could, be built as part of the Mountfield Park site as allocated in the current Local Plan. If it is to be built as a shell in return for 2000-3000 more dwellings effectively joining the Mountfield and Thanington developments then very careful and detailed traffic and access studies will be needed as all indications are that both Mountfield and Thanington traffic studies have been made independently of each other (as have the other strategic sites). The total traffic impact of all strategic sites needs proper analysis together with the possible impact of the emerging plan. Furthermore there will need to be a masterplan for what will effectively be a huge 8000 dwelling urban extension S and W of Canterbury. This will need to consider roads, educational, shops, and a full range of social infrastructure needs.

- dd) The Eastern bypass should have been part of the present Local Plan. We should reconsider the need for the 4th slip road at Wincheap, the P&R extension and the new A2 Bridge interchange (total cost £50m) and consider replacing them with the bypass. This may allow further housing in South Canterbury which will facilitate costs.
- ee) Agree
- ff) Agree. But infrastructure must be masterplanned (see q above). Infrastructure also means social infrastructure.
- gg) Agree. However, developers will always be able to afford better accountants than CCC so I am sceptical we can make this stick. Developers will build at the rate they can sell houses according to current market demand. More houses will not mean cheaper houses. There is no incentive for developers to flood the market and drive prices down because that will only affect their bottom line.
- hh) This needs primary legislation in the form of a land tax and a developer profit threshold. Given that neither government nor local authorities actually build houses, the government dictat that we build 300,000 dwellings pa, simply means that developers actually build them. The situation where, for example, the directors of Persimmon Homes are paid £100m+ to follow government guidelines must be addressed.
- ii) Agree
- jj) Agree. But emphasis needs to be to supply jobs to Herne Bay as the area in most economic need.
- kk) See jj above.
- ll) Agree. This could be houses built with an area for homeworking, hot desking office space, short term let serviced offices as well as traditional businesses.
- mm) Agree. There may be exceptions for warehousing and some factories. Solar panels on roofs should be the norm.
- nn) Agree. But we should also aim to attract graduates from other areas by ensuring the area is an attractive location to move to (see c above)
- oo) Agree. But we must try to ensure hotels, and especially new hotels and B&B accommodation remains viable by controlling Air B&B and marginally costed PBSA which will undercut established and new businesses.
- pp) Agree

- qq) Agree. We must do all we can to protect our town centre shops. As bulky goods and clothes are increasingly ordered on line some of our retail estates may be repurposed as offices/residential.
- rr) Agree. See Wincheap 2020 Vision document but note the estate employs people in a number of non retail businesses which will need protecting. Given the strategic location (less than 15 minutes walk from Canterbury E and W stations, bus station, city centre) it is a prime housing led redevelopment opportunity. However, to consider issue TCLF3 I would need sight of the LCSR 2021 report. Where can I access this please?
- ss) Agree
- tt) Agree. But we must accept the preferred cycling and walking distance government statistics. None of the strategic sites meet these standards and all are also uphill. We also have to account for an ageing population who are less likely to be able to cycle or walk.
- uu) Agree but this needs to take account of bus frequency and cost. It is better to look at a 15 minute city approach with local facilities available to residents.
- vv) Agree but look at the possibility of major new development close to railway stations or one with a big enough urban centre to justify an economically viable bus service to the rail station.
- ww) Agree
- xx) Some inner urban areas can be car free but the needs of elderly/disabled must be catered for. Suburban schemes to be encouraged with parking areas off street and at rear of houses or in small communal car park areas.
- yy) The transport assessments must be rigorously checked. Any developer will instruct his transport consultant, who is in his pay, to produce the result he wants. Furthermore all these transport plans are produced individually and without reference to the cumulative impact of the total number of sites in the Local Plan on the strategic road network. This is a major failing as has been discovered by residents who have paid for independent consultants' reports on the Thanington and Mountfield Park developments. These have been very much at odds with the developers' own paid consultants.
- zz) The current policies need strengthening. We have seen wholly inappropriate building in Wincheap (No190) which has still not been

addressed by enforcement, inappropriate shop fronts at Metro Bank, neon lighting, lighting at Club Chemistry and in new housing in Puckle Lane, fencing off the castle and allowing a major heritage asset to further deteriorate etc. See also comments to c above.

- aaa) Agree but this is a huge challenge! The cathedral will never be a carbon neutral building to heat!
- bbb) Agree. The health benefits of open space and green space are only just being recognised.
- ccc) This would have to be done with extreme care and be very much exceptional. It is a potentially dangerous change but flexibility may be very occasionally needed.
- ddd) Street lighting can usually be turned off at 23.00. This needs to be done in more suburban/rural areas. Lighting needs to be directional.
- eee) The health value of open space is only now being recognised. Open spaces must be accessible and not at the fringe of a development or just seen as a buffer between one development and another.
- fff) This approach recognises the health and social values of sport. However, sports pitch provision should be in addition to public open space.
- ggg) Green spaces are irreplaceable and must be retained and enhanced
- hhh) A considered case by case approach to coastal protection seems sensible.
- iii) Climate change suggests we will need to conserve water resources more actively. SUDS systems make economic and environmental sense. Open swales and surface water drainage to ponds can provide active wildlife and leisure interest.
- jjj) Agree in the light of Stodmarsh and the need to ensure drinking water quality.

Nick Eden-Green