



St Michael's Road Area Residents' Association

CANTERBURY DISTRICT LOCAL PLAN

CONSULTATION ON DRAFT VISION AND OPTIONS, JUNE-JULY 2021

Response from St Michael's Road Area Residents' Association

GROWTH OPTIONS

We strongly disagree with the Preferred Option (Canterbury Focus B). We believe that the proposed additional development of between 14,000 and 17,000 new homes is far too high, and if new development is focused on Canterbury it would come close to doubling the population of the city. The government target of 9,000 homes is itself questionable, based as it is on figures and projections provided by the ONS which have been criticised by the Office for Statistics Regulation, especially as applied to smaller cities with large student populations. See

<https://www.planningresource.co.uk/article/1715462/watchdog-finds-ons-population-projections-coventry-small-cities-potentially-high>

and

<https://www.localgovernmentlawyer.co.uk/planning/401-planning-news/47066-populations-estimates-used-for-planning-assumptions-in-parts-of-midlands-based-on-error-says-statistics-regulator>

We ask that these figures should continue to be investigated and questioned.

We believe that the building of 14,000-17,000 new homes, focused mainly on the city of Canterbury, would be hugely damaging. It would put an immense extra strain on the city's infrastructure, for which no clear plan for overall improvement appears to have been developed. Even if the infrastructural needs of individual developments are addressed, a piecemeal approach would fail to take adequate account of the cumulative impact on the city as a whole, including

- Traffic congestion
- Electricity supply (capacity of substations, strengthening of distribution system)
- Water supply (reservoirs)
- Waste water treatment
- Waste collection and disposal
- Education provision
- Medical provision
- Emergency service routing for rapid access

We recognise the problems of traffic congestion in the city, and we highlighted them in our response to the 'Issues' consultation. However, we believe that the Preferred Growth Option would make things worse rather than better by increasing traffic loads without improving core road systems.

Even if a new eastern bypass were to provide some amelioration of the problem of through traffic, the congestion arising from cross-city traffic and journeys into the centre would greatly increase, and would directly affect residents in our own area, including at pinch-points such as St Dunstan's and St Stephen's, where there are level crossings with narrow lead-in roads and little queuing capacity. The eastern bypass as proposed looks as though it will also exacerbate the congestion problem in Sturry.

We would welcome further investigation of possible routes on the eastern side of the city which could divert traffic away from the inner ring road. However, we do not believe that the right solution is a major new eastern bypass funded by developers' contributions from 14,000-17,000 new developments.

We accept the need for an appropriate level of new housing but believe that this should be distributed around the district, not focused on any particular area, and without infringing on existing green spaces. We therefore disagree with Canterbury Focus A, Canterbury Focus B, and all the specified options. To the question "Are there any other growth options we should consider?" our answer is "Yes."

HOUSING AND NEW COMMUNITIES

Issue HNC1 Providing the right types and tenures of housing

We believe that new housing development should include, as a priority, housing that is genuinely affordable for local people, including social housing. The Draft Options pay far too little attention to this. Canterbury City Council should investigate ways of ensuring that housing is prioritised for people who live and work in the district. St. Ives in Cornwall is a good example of such an approach: <https://www.stivestowndeal.org.uk/wp-content/uploads/2021/02/FINAL-St-Ives-Town-Investment-Plan.pdf>

Issue HNC3 Brownfield and regeneration developments

We believe that new housing should be primarily on brownfield sites. In Canterbury this should include utilising the opportunities for new flats and apartments in what have previously been retail buildings such as department stores, regeneration of the Wincheap industrial estate, and building new housing on underused car parks. We support option HNC3B:

HNC3B - Maximise opportunities for delivery of suitable brownfield and regeneration developments.

Issue HNC11 Student accommodation

We are generally in favour of purpose-built student accommodation. However, this should not be sited in such a way as to unbalance local communities. Each case should be assessed on its merits. We would further query whether new PBSA is needed in view of the fact that part of the Parham Road PBSA has been bought by CCC for family occupation. CCC and the universities should co-operate in sharing projected student numbers so that the likely requirements are known in advance. All new PBSA should be easily convertible to other occupation.

We recognise the case for providing PBSA on or near the university campuses, but we would also emphasise the importance of adhering to the University of Kent Masterplan, which rules out development on the southern slopes of the University, and we recommend that the protection of

the southern slopes should be strengthened. We therefore do not consider that any of HNC11A, HNC11B or HNC11C satisfactorily addresses the issue of new student accommodation.

HISTORIC AND NATURAL ENVIRONMENT

Issue NE4 Areas of High Landscape Value

We believe that the Canterbury AHLV (the Valley of the River Stour around Canterbury) should continue to be protected in its entirety. We strongly question the statement that “the landscape is not of high quality to justify a landscape designation”. We therefore disagree strongly with option NE4O which proposes a criteria-based approach to assessing the landscape impact of developments in the Stour Valley and on the Stour Valley Slopes. Such a piecemeal approach would fail to respect the inter-relation of all the various landscape elements which gives the whole its value and biodiversity.

Issue NE7 Protection of existing Open Space

We believe that protection should be strengthened for Open Spaces, we support a more proactive approach as proposed, and we welcome the development of an Open Spaces Strategy. We support option NE7B

NE7B – Identify and protect open spaces within the Local Plan, providing clear criteria to be met if open space is proposed to be lost.