

Sturry Parish Council Response to Consultation of the Canterbury and district Local Plan 2040

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In reading the various options presented by the City Council, Sturry Parish Council have considered that Canterbury City Council has declared a climate emergency and is committed to reduce carbon emissions to net zero by 2030.

Section 1 - Draft Vision and Growth options.

We have looked at the various Options and cannot support any of the options being offered.

The Housing Needs Assessment of May 2021 states quite clearly that the latest ONS growth prediction, 2018 for the district up until 2040, is 8%. The latest population figures we have, 2019, give a current population of approximately 165,400 and equals a population growth of about 13,230. Given that the largest single need is for three- bedroom dwellings, we can be fairly confident that that the number of persons per household will be in the region of 2.3 as used in recent planning applications. This equates to a need for 5.575 to 6,000 new homes by 2040 or 330 -350 new dwellings per year.

The Standard Method used for calculating housing need as set out in the NPPF stipulates use of the ONS growth predictions for 2014 which for Canterbury is almost twice that of current predictions and is, unquestionably, out of date. As the current Local Plan was not adopted until 2017, questions need to be asked over whether the current Local Plan target average of 800 homes per year is already producing an over- supply and whether this needs to be taken into account in assessing future needs.

The Standard Method also required the application on algorithm which is seen by many informed persons including MPs, national organisations and local authorities as divisive and designed to

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artificially inflate housing need by factoring in economic differences between incomes and house prices which quite illogically assume that the difference is due to price elasticity and will disappear if we increase housing supply. The algorithm needs to be revoked so that supply and need come back into line.

The preferred Option – Canterbury focus B, is the worst of all the scenarios and is unsupportable, not just due to excessive amount of housing it proposes but for:

- the damage done directly to biodiversity in the district - the proposed eastern bypass would run straight through the Old Park SSSI.
- Its impact on rural character and landscape,
- its high carbon footprint, both during the construction and operational phases of development, which is very obviously contrary to government targets,
- its drain on water resources and
- its conflict with Natural England's efforts to protect the internationally important nature reserve at Stodmarsh from pollution attributable directly to new housing development.

We know of no one in favour of this proposal other than developers, some landowners, and the City Council, all of whom are hoping to make a large profit from this. It is becoming obvious that it is hugely unpopular and Canterbury City Council needs to take heed of what its Parish Councils and residents are saying.

What Canterbury City Council has not offered us is the missing 6th option which is to apply growth targets in line with housing needs and in line with responsible stewardship of our natural and environment resources and minimisation of our carbon footprint. This is the option in which Canterbury City Council, in concert with other authorities in the region, should challenge the government-imposed housing targets and respond to the people's wishes. We have been sickened by the bulldozers destroying our fields and landscape and in despair for the future if even the least of the current growth options is adopted. The huge building programme has, so far, failed to provide homes that local people can afford. It has created astronomical expectations on realisable land values so that land is financially out of reach for any other purpose.

A stand against this truly abominable destruction would earn the respect of thousands of people here and if this option had been offered is certainly the one that would have had the greatest support. So why has it not been offered? The presumption is that the City Council is out, primarily, not to meet housing needs, but to raise money for projects which would accommodate more visitors but at the expense of destroying the very things they have come to see, namely, a historical city with its character and culture intact.

We have had words explaining that we need vision and courage, who could disagree, but what is the point when it takes us to places we don't want to go? We are being asked to join the development bandwagon which, like all bandwagons, doesn't care where it is ultimately going or what damage it does along the way.

We have worked through the other sections of this consultation and attempted in our response to indicate clear preference with regard to the options offered. Our responses need to be considered in conjunction with the comments above.

Section 2 Town Centre Strategies

Draft objectives for Canterbury

These need to show some understanding of the reasons for decline of city centres and where the continuing changes in consumer preferences and entrepreneurial opportunities are leading.

An increase in residential population is to be welcomed and would help to avoid areas of the city dying and potentially becoming unsafe after the close of office and retail hours. The beneficial influence of occupying flats over shops will, however, be less than the benefit of having dwellings with direct ground level access to the street. Also, the limitations on car ownership within the city will necessitate some diversification of the retail offer so that affordable basic household necessities can be purchased within the city without the need to travel to out of town shopping centre. This has possibly been the greatest area of loss from the city in the last two – three decades. In the face of high rents, low merchandise value and strong competition from out of town centres, how is this going to be sufficiently rectified?

The objective is to place a high reliance on income from tourists and this carries a high risk with poor resilience and poor business continuity in a changing economic climate. The recent impact of COVID19 should have brought home the unsustainability of having too many eggs in this basket.

Canterbury is successful as an education centre but it depends on the universities to become autonomous and on the degree to which they can benefit by allowing their activities to be supported by the wider city.

Whitstable and Herne Bay

Similar comments can be made as for Canterbury in relation to increasing the residential population although these towns, particularly Herne Bay, have retained a much broader retail base. It should be remembered that trade is kept lively by allowing through traffic with on-street parking close to shops. The views of roadside traders need to be sought before any attempt to extend pedestrianisation and exclude cars.

As seaside towns , Whitstable and Herne Bay have a different offer from Canterbury for tourists. The catchment for tourism tends to be more local than for Canterbury and consequently less affected by international fluctuations in economics and preferences. As trip distances to Whitstable and Herne Bay are often relatively short, the visits can be more spontaneous, weather dependant and seasonal. The town centre strategies should therefore include measures to even out income over the year by supporting out of season economic activity and providing financial stability over the year where needed.

Section 3. Housing and New communities.

How should we approach providing opportunities for small and medium sized housing developments?

It is not acceptable to deliver 10% of our housing need through windfall sites which may not materialise and which may not have been anticipated by those who will be affected by such development. People and local authorities need reasonable certainty to enable them to plan their lives and business, so small sites should be allocated as far as possible. There should not be additional policy support for windfall sites

Preferred Option - **HNC2B**

Issue HNC3. How should we provide opportunities for suitable brownfield and regeneration developments?

We don't really see how HNC3b builds on HNC3a but would agree that that regeneration of brownfield areas should be prioritised over the development of greenfield areas.

No clear preferred Option

Issue HNC4. How should we make sure that the right densities are delivered in developments across the district?

Always again

The wording of the options given here is pushing at the maximum density door and we can equate "efficient use of land" with cramming in as many houses as possible. It seems to be the case that this is the way things are going regardless of the option chosen. We would prefer to have all aspects of design, including densities, considered in context of the character of the site and the needs of the people living there. Option A is therefore, taken at face value, preferable and nothing else should be necessary. The fear is that a way will be found to regard minimum space standards and minimum open standards as the maximum and not an inch of space allowed beyond this.

Preferred Option – a qualified HNC3a.

Issue HNC5. How should we make sure housing is provided for rural communities?

The aim should be to put housing where it is needed and at a price that can be afforded. Policies should not prevent proportional development in villages but much more focus is needed on the provision of affordable housing in rural communities even within small developments with a needs-based mix of housing tenures. Policies should aim to remove the need for rural exception sites and ensure that rural affordable housing is delivered through site allocations. Policy requirements on this should be clear and non-negotiable so that developers and landowners are brought to reasonable expectations on development land

values. We believe that a further option should be offered here which will provide rural housing where it is needed but will also ensure that the balance of tenures delivered also meets the needs of local people.

Preferred Option ADDED Option HNC5d – combines HNC5c with controls on the balance of housing tenures.

Issue HNC7. How should we make sure all design is high quality?

Quality is a completely meaningless word unless it is defined and properly scoped. Design coding can be a useful way of doing this but design codes that achieve clarity and certainty without being over-prescriptive are very difficult to write. The more all-encompassing they have to be, the harder it is to produce anything that will be both meaningful and comprehensively appropriate. Option HNC7b should be struck out, nothing worthwhile will come out of this unless it sticks to technical performance of dwellings and space standards, these are already covered by existing technical standards.

Our experience of master planning by developers on major sites is that it can be very poor, and that Canterbury City Council will do nothing to sort out the fundamental problems with it. We would therefore be reluctant to support Option HNC7a. This leaves Option HNC7c which will be only as good as the City Council's ability to provide satisfactory masterplans and see that they are delivered. We would also expect consultation on the masterplans for strategic sites and to have our views considered. We are really tired of poor planning with both developers and council officers doing their best to convince us that black is white to enable them to rake in money for off-site infrastructure.

Preferred Option - a qualified Option HNC7c

Issue HNC8. How can we deliver low carbon and energy efficient housing?

The current approach is not achieving sufficient carbon efficiency. The effectiveness of requiring energy efficiency plans is doubtful as plans do not in themselves deliver improvement and it would be better to set definite standards.

The options present various measures as alternatives but to be effective these measures need to be applied in combination. Option HNC8c that requires net zero will be completely ineffective if developers can get away with paying a penalty for failing to meet the standard. Net zero construction is expensive and unless the penalties are really punitive, they will simply allow developers to buy their way out of meeting the standard. We would need to know exactly what the decarbonisation fund will provide in terms of reducing carbon footprint – don't even think about putting into road construction (or towards releasing other money for this purpose)

One further point on the cost of improving energy efficiency is that this needs to be achieved but not at the cost of failing to meet other environmental and community. These provisions must be safeguarded, and the cost made to fall back on the amount paid for land.

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This must be very clear to developers from the beginning – and that in viability assessments the residual land value reflects the full cost of fully complying with all Local Plan policies.

Preferred Option either:

HNC8b+HNC8f or

HNC8c + HNC8f

Issue HNC8. How should we improve water efficiency?

This is only one aspect of the much more important question which is how do we make sure there will be enough water in the future? The obvious answer is not to overdevelop. We know that our housing need is far less than the government's target and that much of the population increase in the last few years has been through migration into the area. This is an area with foreseeable problems in maintaining water supply in the future. The Broad Oak reservoir is too far off and will be too dependent on adequate flow rates in the River Stour over the winter to be relied on to supply massive new development. The first course of action is therefore to curtail increase in demand by meeting our needs rather than your greed and providing only the number of new homes actually needed.

In combination with this, we would prefer option HNC8I, but wonder how the proposed standard of 90l per house/day can be enforced in perpetuity. The requirements and expectations are good, but we feel there is a lack of certainty over whether they will be achieved. Please also see our comments above on the costs of meeting improved standards. Preferred Option HNC8I - with restriction on development – see Comments on Growth Options above.

Issue HNC8. How should we incorporate renewable energy in new developments?

Neither of the options offered really give any certainty over provision of renewable energy and this is a complicated issue that needs to weigh the carbon footprint of manufacture, transport, installation, maintenance and design life of installations against the energy provided. Developers will only weigh the cost of providing renewable energy installations against the imposed costs of not doing so.

It is really up to the City Council to do more research on this subject and come up with the most carbon efficient systems taking whole life pros and cons into account. This research will also need to take account of site-specific factors as there is unlikely to be a one size fits all solution. Once this is done it should be possible to be more positive about what our requirements are and not simply allow developers to make a case for doing nothing. Preferred Option – None, this issue needs more research before effective options can be offered.

Issue HNC9. How should we provide housing for older people?

The Housing Needs Assessment 2021 says:

p11 “both projections (2014 and 2017) show significant growth in the older age (65+) population, as the relatively large cohorts born in the decades following the Second World War move into the older age groups. It is the growth in these older age groups that has important implications for the provision of housing over the plan period. “

p12 “the following minimum levels of need over the plan period have been identified for older people accommodation:

- *Age Exclusive Housing Stock: 576 units*
- *Specialist Units: 1,732 units*
- *Care home bedspaces +1,150, 26% with nursing. “*

p39 “It is recommended that the Council considers the provision of smaller-sized bungalows within the overall mix of housing, as evidence suggests there is high demand for these properties in the 65+ age groups. To maintain current levels of occupancy, over the course of the plan period, the number of bungalows would need to increase by between 2,440 and 2,950. “

None of the options offered come anywhere near meeting this requirement and there needs to be a commitment to providing both the amount and type of older person's accommodation needed. Generally, the more independent older people prefer to live near their families where there is practical help and a reduced risk of social isolation. Provision for older people therefore needs to be everywhere that people live and not confined to major sites or specific sites. Policy needs to provide for inclusion of older people's bungalows within a good balance of house types in all housing developments. Larger sites and existing urban areas and larger settlements could have specific areas dedicated to independent older people's accommodation provided these are well-placed regarding supporting facilities, especially public transport, and shops. Major development should also be required to provide or contribute to residential and care homes as set out in the HNA. 2021 – see above

Preferred Option – none of those offered. We need an option that provides the quantity, distribution and types of accommodation needed.

Issue HNC10. How should we provide accessible and disability-friendly homes?

Why, if Option HNC10B requires all dwellings to be built to MA(2) standards, and assumes that this is economically feasible, does HNC10C not require 95% of homes to be built to M4(2) and 5% to M4(3)? It is hard to accept the ethics involved in throwing away 100% M4(2) to gain only 5% M4(3).

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Preferred Option HNC10B amended to include a minimum of 5% M4(3) dwellings

Issue HNC12. How should we provide accommodation for gypsies and travelers?

There need here seems to be to provide the best balance of certainty and flexibility we are happy with the approach in HNC12C

Preferred Option HNC12C

Issue HNC13. How should we support opportunities for self and custom-build housing?

We don't see this as a major issue and believe it would be sensible to allow these opportunities to be demand-led such that:

- Developments over 20 dwellings should offer 5%, or more if they wish, on a time-limited basis so that lack of uptake doesn't prevent buildout of sites.
- Individual, allocated sites be allowed in suitable locations

Preferred Option- HNC13C for at least 5% on major sites but with time limits (linked to the phasing of development delivery?) for uptake.

Issue HNC14. How can we maximize the benefits of strategic infrastructure investment for residents and businesses?

Option HNC14C would appear to provide the greatest certainty over the delivery of necessary infrastructure. However we are concerned by the inclusion "*allocate sites and take a more proactive approach to the delivery and design of infrastructure projects, if this is justified and where they are sufficiently progressed.*" Does this mean that if projects are not already being progressed there will be no allocation? Further, as with other issues, the preferred option is only as good as the details written into it. Where the City Council allocates sites for strategic infrastructure, we would expect consultation and would fully expect that all aspects of accessibility (financial, physical, and cultural) to be addressed.

Preferred Option - a qualified HNC14C

Issue HNC15. How can we enhance the production of community and utility scale renewable energy?

We do not believe that the need for this must be proven any more.

Preferred option – HNC15B

Issue HNC16. How can we make sure that infrastructure is delivered at the right time to support development?

Past practice has not always delivered infrastructure by the time it is needed and Option HNC16A should be struck out. However, option HNC16C is risky and could lead to avoidable higher finance costs for development, to unused or underused, and therefore unsustainable infrastructure where development is approved but not delivered. It could subsequently be used to drive development where it would otherwise not be permitted by creating 'best public interest' arguments.

Preferred Option – HNC16B

Issue HNC17. How should we address changes in development viability at the planning application stage?

Option HNC17A mentions viability assessments at three stages – the planning stage, the planning application stage and the planning approval stage. The other two options seek to reduce the chances of a viability assessment which has been submitted at the planning stage from being reviewed at the planning application stage. They don't mention whether a review will still be allowable at the planning approval stage or what criteria would be set for this. We need some clarification on this. We also want to know what will happen if a post planning stage viability assessment shows the development to be non-viable and the developer chooses not to proceed without concessions on contributions, community provision etc. In the past, to our cost, we have seen concessions made for housing number targets to be met and for strategic infrastructure to be funded. What guarantees do we have that this won't happen again?

Preferred Option – None, further clarification and assurances needed.

Issue (HNC18?) The missing Issue! How do we provide for homeless people?

Why hasn't this been included in the issues identified in this section? The delivery of new market and affordable housing will never be the answer to this problem as most homeless people are unable to get a mortgage or sustain a tenancy. The problem doesn't seem to get any better, it has been ignored here, leaving it very largely to voluntary organisations to deal with. Please can we have some definite proposals from the City Council for accommodation to help the homeless.

Section 4 Employment and the Local Economy

Canterbury city Council consultation document says;

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"The Economic Development and Tourism Study 2020 showed that 136,700sqm (or 29.7ha) of new business space is needed over the period of the new Local Plan to 2040. Although this figure is lower than the amount of space planned for in the current Local Plan, the report shows deliverability risks with some of the existing allocated employment sites."

Is this for 9,000 new homes or 17,000 new homes?

"Many of these sites have not been developed, and some have already been lost to other uses. There may be potential to expand or intensify existing business areas, which can be quicker than developing totally new sites".

The Economic Development and Tourism Study 2020

"This study has been undertaken during a period of significant economic uncertainty associated with the Covid-19 pandemic"

Issue EMP1. How should we ensure that enough business space is provided in the right locations to support growth?

We note that EDTS has identified that there may be delivery problems with some of the allocated employment sites such as Sturry Road. We also agree that that employment opportunities should be responsive to demand and that other sites including mixed use sites could be allocated. We are very concerned that the employment base of the district is maintained and that existing employment land is not reallocated for other use unless alternative sites offering the required capacity and employment mix do come forward. We would tend to favour Option C but only if this can be achieved without any loss to the total employment land coming forward.

Preferred Option – a qualified EMP1C

Issue EMP2. How can we provide opportunities for the right mix of jobs, including higher paid jobs, to be created?

The EDTS does reveal a slightly lower proportion of higher paid jobs relative to the region and country as a whole and attributes this to the high reliance on tourism, hospitality education as employment providers compared with other regions. We would expect this to have led to an increase in total employment relative to areas without these opportunities and this seems to be the case. This bias does not therefore necessarily reflect a lack of opportunity in other sectors, and we consider it appropriate to ensure that employment opportunities are created in a balanced way without over emphasis on creating higher paid jobs.

We would therefore prefer to maximise market flexibility provided that a variety of sites are brought forward which cater for the full spectrum of employment location preferences.

Preferred Option – a qualified EMP2 B

Issue EMP3. How can we best support the delivery of allocated employment sites?

The problem as we see it is that land within strategic sites is being allocated for employment. Developers go along with this, get their planning permission, leave the delivery of employment till last and then default on viability grounds, which are nothing to do with whether we need the employment or nor. It must be recognised that if businesses are going to be viable what they need more than anything else is affordable rents and it is too easy for a developer, large or small, to falsely demonstrate that there is no demand when the rent/purchase price is set so high that businesses can't take them on.

We feel that the heart of this problem lies with inflated land values which force up the outturn required to ensure viability. For mixed use major sites, the solution is to disallow viability as a justification for non-delivery and set delivery of employment land at a given occupancy percentage. If this is enshrined in those policies governing the earliest stages of the planning process, then developers will take care to factor in more realistic purchase costs so that the employment can be delivered with reasonable profit levels.

Delivery strategies will not be the answer unless they actually change viability factors and further development to enable economic delivery shouldn't be entertained.

Preferred Option- None, we don't feel that any of these options will effectively bring about delivery of employment land.

Issue EMP4. How can we improve the accessibility and connectivity of employment areas?

It goes without saying that all new employment areas should have digital infrastructure and sustainable transport connectivity and there is nothing to choose between these options as far as this goes. In EMP4C, the threshold of 300 homes is too high for live/work units especially post COVID when working from home is becoming normalized. There needs to be measures that ensure that the 300-home threshold does not automatically become the maximum size that can be built without provision of employment. Delivery of employment should be possible for smaller developments, and this should be put into the site policies where the logistics are favorable to employment— See comments above on viability.

Preferred Option – a qualified EMP4C

Issue EMP5. How can we improve the energy performance and carbon emissions of new commercial developments in the district?

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Net Zero is the only option if carbon emissions are to be reduced to zero by 2030. As with other options presented, the financial implications for build cost and rents need to be considered and steps taken to ensure that new zero carbon premises are affordable. As with dwellings, the option to 'buy out' must be removed if the option is to be effective.

Preferred Option - a qualified EMP5D

Issue EMP6. How should we support the development of our universities?

The option EMP6B is potentially capable of integrating the university development with the city but it is unclear from the wording of this option exactly how this will be done.

Preferred Options – potentially EMP6B depending on further detailing.

Issue EMP7. How can we support the delivery of new, high quality tourist accommodation to boost overnight stays and support the local economy? - Focus tourist accommodation within or on the edge of the town and city centers.

The full potential of our varied rural and coastal landscape to provide employment should be encouraged, so long as we are talking about small, in character development that doesn't actually detract from what people come to see. Perhaps if it starts making a bob or two you might start appreciating what we have and stop building all over it!

Preferred Option – EMP7C

Issue EMP8. How should we support the growth and development of the rural economy?

EMP8B seems to confuse supporting the rural economy with expanding commercial space into rural locations. Supporting the rural economy would normally be taken to mean economic support for specifically rural enterprises and the rural population. We would support options that did this but do not support the allocation of greenfield sites for unrelated commercial use to compensate for allowing non-delivery of existing employment allocations in favour of their conversion to housing.

Preferred Option EMP8A

Section 5 Town Centres and Local Facilities

Issue TCLF1. How should we designate the hierarchy of centre in the district?

Preferred Option TCLF1B

Issue TCLF2. How should we support appropriate growth and development at out-of-town retail areas in Canterbury?

Greater flexibility of use within existing retail areas would be welcome so long as the use remains commercial and no new retail centres are created to compensate for loss of existing retail space.

Preferred Option TCLF2 A

Issue TCLF3. How should we support and protect our local centres?

No preferences – any proposed changes are minor and comments from nearby residents should be considered.

New local centres

No preferences – any proposed changes are minor and comments from nearby residents should be considered.

Issue TCLF4. How can we best support our village centres?

Facilities and services in villages do need more protection from loss but we are concerned that option TCLF4 allows a 'get out' for those wishing to remove services. This option will only be as good as it is effective, and we would like some assurance over this. See also our comments from EMP3 "it is too easy for a developer, large or small, to falsely demonstrate, that there is no demand when the rent/purchase price is set so high that businesses can't take them on."

Preferred Option – a qualified TCLF4B

Section 6 Movement and Transportation

Issue MT1. How can we maximize active travel in the district?

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We are disappointed and very angry at the way proposed major development in this parish has ignored the need for pedestrian and cycle connectivity with the existing parish and with Canterbury and with the way the proposed riverside walk in its eastern section has been turned into a busy road-side walk rather than making sure that the environment and utility of the main footpath towards Canterbury is protected and improved. Dangerous situations for pedestrians have been created in three locations along the periphery of these developments and the concerns of residents have been ignored.

What faith do we, therefore, place on either of these policies?

Perhaps you would like to start by removing the dangers and inconvenience you have already allowed to be created. We are also being threatened by further permanent removal of a pedestrian routes when Land at Sturry is built. – Not good enough.

There have been transport assessments – all bigging up the low cost and easy to provide routes provided and fudging over many real issues. These aren't worth the paper they are not (nowadays) written on if you don't look at them more critically and stop regarding them as tick box exercises.

Preferred Option - heavily qualified MT1B

Issue MT2. How do we support greater use of public transport in the district?

These options are really weak and show a lack of commitment to working with rail providers to develop and maximise use of the existing rail infrastructure. Developer contributions should be deployed towards this rather than building evermore roads so that additional rail halts and facilities can be provided. Allocation of land for development should be concentrated around rail and bus services. We never get more than lip service on these issues and requiring developers to “look at opportunities” is pointless, we need a commitment to making it work.

Something much more innovative is needed, as we are lagging behind practically every other country in Europe both on infrastructure and affordability.

Preferred Option – none – we need to do better than this.

Issue MT3. How will we support the rapid transition to zero emissions vehicles?

We would be in favour of the higher levels of provision for EV charging points but once again must ask the question of how this is paid for.

Preferred Option – MT3B

Issue MT4. How should we set parking standards in the Local Plan?

Generally, we feel that the current KCC parking standards are a little too rigid and taking a more flexible approach would be better – depending on what exactly that approach would be. We ask that the provision for disabled parking is considered so this is sufficient for an increase in the older age groups both for on street residential parking and employment/retail areas. It is also time to ask for small bays dedicated to mobility scooters to be provided.

Preferred Option MT4 B

Issue MT5. How should we produce transport assessments, transport statements and travel plans?

Transport assessments and travel plans are only as good as the scrutiny they receive and, in this parish, have not been effective in making sure that developments do not create problems. So, the adequacy of all of these options depends very much on the exact wording of policies and the diligence of the City Council. The requirement to consider the impact of development on local transport, needs to be extended to smaller development, so Option MT5A needs to be removed.

Our main comment when it comes to small development is that the impact of each development must be considered in combination with other developments in the vicinity. This principle stands together with our preference for small sites to be allocated and there being far less reliance on windfall sites. The principle here is that it is quite impossible to assess in combination effects of small developments when the extent of additional nearby development is unknown. This point comes from our experience of multiple small sites being granted permission along a dangerous stretch of road with each one relying on the same, increasingly out of date, historic base data on traffic flows. No account taken of the cumulative impact of all the developments taken together.

Preferred Option – a qualified MT5C

Section 7 Historic and natural environment

Issue NE1. How can we protect and enhance our heritage assets?

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Its hard to take any of this seriously when you have allowed 700 houses and a massive road to be built in an existing area of high landscape value. The developer's landscape assessment claimed that the long-term effect on the landscape in parts of this area would be an improvement. The first thing, obviously that your policies should do is insist that these assessments actually tell the truth!!

The existing policies seem to be waived aside whenever it means we can cram in more houses so what is the point? Canterbury City Council need to do much better than this. Existing policies need strengthening so they can stand up to conflicting interests.

Preferred Option – NE1B some work needs to be done to strengthen existing policies and give them teeth.

Issue NE3. How should we protect and enhance biodiversity and green and blue infrastructure?

Another set of weak options. These are coming in the wake of an environmental tragedy at the current Site 2 in respect of ancient woodland and irrevocable loss of all existing dormouse habits. There will an acknowledged loss of biodiversity on this site, and you have still approved the planning applications. The current practice at CCC is to allow even the worst of design and master planning if it ticks the prescribed boxes. We are especially concerned about B and C where they say to *enhance existing, or provide new, green infrastructure*". we need the option of developers doing both.

What does 10% gain in biodiversity actually mean –physical area, number of trees, surviving species – or what? It is not OK to destroy sensitive, rare and site-bound ecology with a few bird boxes and new trees. Different habitats and ecosystems are not all of the same value. We need strong and adequate policies that show some understanding of the issues involved and which will actually deliver the protection and enhancement we seek. The options for changes to what we have now do not appear to make protection and enhancement any more certain.

Preferred Option – an enhanced NE3A regarding actually delivering protection and enhancement

Issue NE4. How should we make sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscapes?

On this issue we have concentrated on the landscape around Sturry Parish and have left comments on North Kent Marshes LLD, North Downs LLD, Blean Woods LLD and the Wantsum Channel LLD to residents who live nearby.

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Our comment does assume that the city council will do a better job in protecting designated areas than in the past. We would be in favour of a new Stour Valley Floodplain designation. We know that some of the area is already protected by SSSI protection – but not all of it and this is in any case a different designation with a different purpose. Some of areas proposed for inclusion have a very high recreational value to which landscape quality and character is intrinsic.

We are in favour of retaining the Canterbury AHLD as you are not providing us with any of the criteria that would be replacing

Preferred options – NE4L and NE4N

Issue NE5. How should we make sure our approach to green gaps is still effective?

This is a joke since your approach is very far from effective now. You have allowed houses and a road to be built in part of the Sturry/Broad Oak Green Gap. You wiped out most of the Sturry/Canterbury Green Gap in your last Local plan and then allowed a road to be built in the pathetic little bit that was left. (Since when was tarmac green?). Like so many other decent policies that protect our environment they are the Cinderellas of the Local Plan and never get to the ball if someone waving pound notes wants their ticket. Shame on you. WE do not believe that any buildings should be allowed at all but open sports fields would be fine. Allotments, cemeteries not fine since these would involve security fencing (please don't tell us you can put a hedge round it) , roads, car parking etc.

We don't wish to put forward any new areas of Green Gap but believe that others should be able to do so. Do you think you can manage to enforce these policies in future?

Preferred Options NE5A and NE5S

Local Green Gaps

Preferred Options:

Sturry Green gap between Sturry and Westbere

Option NE5C

Green gap between Sturry and Hersden

Option NE5E

Green gap between Sturry and Broad Oak

Option NE5J

Green gap between Canterbury and Sturry

Option NE5P

Issue NE6. How should we manage outdoor lighting to support tranquility?

Preferred Option NE6B

Issue NE7. How should we protect existing open space in the Local Plan?

Option NE7B will be a better option provided that the supporting mapping and open spaces strategy is adequate, we would prefer to see this option as provided protection for mapped space but not necessarily assuming that any spaces missed from the maps can be lost.

Preferred Option – a qualified NE7B

Issue NE8. How can we support the provision of accessible outdoor sports and recreation across the district?

On several occasions we have sent you our Facilities Audit for Sturry Parish which demonstrates a significant shortage of all types of public open space especially sports areas. Will you please include this in your list of identified shortfalls? We can send the audit again if required.

Where there is new residential development there needs to be an assessment of existing open space of all types and reductions in developer's obligations only allowed where there is sufficient existing space to provide for the additional needs. Where there is an existing shortfall in any type of open space, not just outdoor sports, a trade could be allowed to help rectify the shortage, this being subject to local consultation. Altogether, in value, the developer's obligations should be met. We feel that Option NE8B is too focussed on sport at the expense of other types of open space provision.

Preferred Option – NE8A

Issue QNE9. How should we make sure our approach to local green spaces is still effective?

Protection for Prospect Field and Columbia Avenue should remain. National criteria will come and go, changing over time and we shouldn't allow the inordinate pressure to sacrifice open space in favour of excessive housing targets to deprive residents of these spaces. We would be in favour of allowing new open spaces to be protected where it is in the public interest, not in accordance with the strict criteria set out in national planning policies.

Preferred Option – a qualified QNE9B

Issue NE10. How do we approach development where there are coastal protection and overtopping hazard zones?

No preference

Issue NE11. How can we maximize the benefits of sustainable drainage systems (SuDS)?

This is another sore subject for this parish where all the SUDS area design into Site are being allowed to count as public open space. These are essentially very large holes in the ground and whether full of water or not are unsuitable for recreational use and have very poor visual qualities. Water levels fluctuate far too much to provide aquatic habitats with any permanent water retained in the bottom where the SUDS is part of an existing water body, so cannot count towards the SUDS volume and would be there anyway. There really aren't many other benefits to be had and we need to stop pretending there are.

Altogether these schemes are still very badly thought out, provided as cheaply as possible without due thought to their long-term maintenance and sustainability and are allowed to be a drain on genuine public open space provision. All reflecting the recent grasping approach to housing development and the refusal to meet the cost of proper provision that does not detract from proper and useable open space provision. We need to stop pretending that black is white and make sure specific provision is factored in with viability appraisals and land values adjusted accordingly. The percentage of SUDS that can be counted as public open space and the qualifying criteria need to be determined by policies and we need to get to grips with this.

The base problem is that we are turning too much greenfield space into rapid runoff areas and need to start being more moderate and less greedy over housing targets

Preferred Option would include NE11B but needs to be much more than this.

Issue NE12. What should we do about groundwater protections?

We are not sure what taking a more proactive approach means. If it means better protection for groundwater, then we support NE12B.

Preferred Option – NE12 B

We note that there is no specific mention of protection for Stodmarsh Nature Reserve, which is surprising considering since we are entirely within its catchment area and its protection from contamination and the effect of poor water quality in the River Stour a national issue.

Comments from residents

“On your recent leaflet, the plan to the south of the railway line going from Sturry station towards Westbere is marked in blue as a proposed development site. As poor drainage already exists in this area any development would make the situation worse and is likely to cause flooding to the properties on the other side of the railway line. Additionally, the access road would have to join Fordwich Road which is already congested at certain times of day. The site known as the "two fields" would basically join Sturry with Westbere which would become just a suburb of Canterbury rather than two separate villages. The land to the south of the A28 bordering the river towards Fordwich floods and is probably a water meadow and part of the flood plain.”