

Response to CCC Local Plan Online Consultation Stage 2 Aug 21 on behalf of Havelock Street Community Group (HSTCG)

We endorse the conclusions of the consultation response document submitted by the Alliance of Canterbury Residents' Associations (ACRA), dated August 2021.

HSTCG's conclusions regarding the main proposals are summarised as follows:

VISION

We are broadly in agreement with the Vision and Objectives, however the **primary focus** should be on promoting sustainable communities in the circumstances of the climate crisis, which is not sufficiently addressed.

Given the uncertainties surrounding employment and housing during the plan period, notably in the education sector, and in our responses to air quality, congestion and climate change, it must be prudent to retain flexibility in the Plan rather than locking-in specific outcomes, which is not sufficiently addressed.

GROWTH

We **strongly disagree** with the Preferred Growth Option and Option 'Canterbury Focus B' because:

No case has been made for the proposal to build more new houses than the minimum required by central government, or how this could promote sustainable communities.

New housing should be shared between Canterbury, Whitstable and Herne Bay, rather than focused on Canterbury.

It would be a **grave mistake** to build new roads on greenfield land to the east and/or west of the city, when experience over decades has been that new roads merely generate more traffic movements. The high capital cost of building new roads would be far better employed for much-needed infrastructure to promote coherent public transport, cycling and walking. The **primary focus** should instead be on reducing demand for private vehicle use, if necessary by the adoption of clean-air zones and/or congestion zones as adopted in other UK cities. Associated revenues could be used to support clean public transport.

We broadly **agree** with Option 'Canterbury Focus A' to build no more than the minimum number of new houses required by central government, although new housing should be shared between Canterbury, Whitstable and Herne Bay, rather than focused on Canterbury.

We **disagree** with the other Growth Options presented, 'Coastal Focus', 'Rural Focus' and 'New Freestanding Settlement'.

URBAN CENTRES

We broadly agree with the vision and objectives presented, although more emphasis is needed on sufficient provision of social housing, and on housing and community facilities catering for the old and the young.

HOUSING

All new housing should be compatible with the objectives for '15-minute communities', with full developer-funding for all necessary infrastructure.

Current plan policies fail to protect residential communities against development of excessive amounts of student accommodation, as the term 'Predominantly Residential Area' is not defined and interpretation has been arbitrary and unfair. Predominantly residential areas should be identified within the Local Plan. HNC11 does not address this issue.

TRANSPORT

Objectives relating to air quality, wellbeing, and active travel should be promoted via measures such as zoning of residential areas to establish low-traffic neighbourhoods and to stop rat-running, and the establishment of default 20mph zones throughout residential areas. These are not addressed.

The current approach has failed to provide any semblance of a coherent infrastructure network for cycling or walking. New dedicated and segregated infrastructure is desperately needed to promote modal shift. A strategic plan should be prepared for a fully joined-up network of cycling and walking infrastructure, which serves the whole district, and which Canterbury can be proud of and can promote widely. This strategic plan should be incorporated in the Local Plan. All developers should then be required to contribute funds toward installation of this network, in addition to provision within their scheme boundaries, rather than merely linking their own scheme to the existing inadequate facilities.

ENVIRONMENT

Areas within the existing Canterbury AHLV, notably all areas of green space, should be protected against development by all available means. The boundary should be retained and the area re-designated as necessary to ensure it is safeguarded (Option NE4N).

Establishment of the proposed additional Stour Valley Floodplain (East) LLV (Option NE4L) should be supported.