

RESPONSE TO DRAFT DISTRICT VISION & LOCAL PLAN OTIONS 2021

1/ Our future District 2040

- **DRAFT DISTRICT VISION**

The vision is fine but it is totally lacking in how it will be achieved in detail, and in some cases I would respectfully suggest that it cannot. The words look fine, but the substance is totally missing. Indeed the whole plan will not work if that happens

The universities will possibly stimulate growth, but that overall growth will not happen unless the area attracts businesses and their employees. They are just one part of the economy, in our case something we have too much reliance on, and which might not contribute as much in the future?

So far there is no evidence of Canterbury achieving that goal with the strategy of the current local plan. Indeed the current local plan targets are not being delivered and it could be questioned if they ever would be? Fundamentally strategies need to be deliverable and this proposal has serious doubts and no evidence to say it can be achieved. It should not be put forward unless that can be proved. Otherwise failure is guaranteed. This proposal could make a bad situation worse.

There is no evidence and mention of the requirement, or any provision for, in the local authority for resource to manage this proposal. It is blatantly clear that Canterbury Council does not have the necessary resource to manage the current demands. So what is going to be done to rectify this situation? It is not only about financial resource, it is also about competence experience and management. All of which appear to be an issue which will be magnified significantly unless this is dealt with upfront.

Infrastructure is key to a vibrant economy, and to assume that this can be delivered by allowing excessive development, by private profit orientated companies, is flawed in the extreme and has consistently been shown to be so. Though, this is a national issue.

That development funding will only provide the required infrastructure is a flawed strategy.

The recent UNESCO World Heritage Status (UWHS) removal from Liverpool, has shown that unsympathetic development, in such an area, can result in the removal of this status. By suggesting the preferred option is to centre the development around Canterbury as a hub, will result in a total ambience change of this medieval city that could have serious impacts in this area for Canterbury. Canterbury is highly reliant on tourism and the draw of the UWHS. The result of a removal of its UWHS would have far more impact on its economy than Liverpool. You only have to look at that strategy, and how it has affected other towns when

it has been followed . That risk needs to be totally mitigated against in any proposals. This vision does not do that.

We have both Ashford and Canterbury following the same path as being an area Economic hub. Where is the evidence of a coordinated approach on this? Should both be looking at that path or should there be a combined strategy between the two authorities on this?

Affordable housing is a misnomer when it is quoted in this context. Affordable means 20% below market value. The market value is set by the developers in their pricing. When the average wage in this area is below £30k and the average house price at present is approx. £350k rising, there is an issue. With new builds, as proposed, unless there are other controls like, dedicated local only purchases, specific supported employment purchases, social housing, retirement housing provision etc. this will just grow into an even bigger issue. There is no evidence that this can be managed and will lead to the average price rising in the district which will not help the housing provision and situation for local people.

- **DRAFT STRATEGIC OBJECTIVES**

The strategic objectives as words, are again fine the problem is do they look deliverable?

A lot of the objectives are not in the control of the council and as such are reliant on outside influences which will play a major part. This will ultimately affect the delivery of the vision. In cases there is evidence that this just does not happen. A single example to illustrate this is ***The delivery of infrastructure***. This stated ***to be delivered in the right time to support development***. By following the route of using development funding for this infrastructure, and this is evidence base, this is never delivered in time to support development. It is delivered, if at all, retrospectively because the funding for this comes from profit to the developer. This does not materialise until after the development is established. How is it proposed this is to be achieved? It is crucial to the vision.

The objectives also require a significant financial resource to be achieved. How is this to be achieved so they can be delivered? Yet another example of the words being there, but there is total lack of evidence as to how it will be done.

Another example of the what is being declared, but no evidence as to the how it will be achieved. This permeates the whole vision as a flaw, and seriously undermines confidence in it as a proposal.

- **GROWTH OPTIONS**

1/ Canterbury focus A

Does this option, of basically an additional 9000 homes (the government target) meet the requirements of the vision? I suggest not:

Delivering homes near Canterbury does not, as stated, lead to more low carbon journeys. The average travel distance to work in this country is approx. 20 miles. There is no evidence to date, that there will be a significant reduction in work travel. The idea that people will suddenly start working from home has yet to be tested. There is strong evidence to suggest that both personally and commercially, that will not happen for various reasons. So if that proves to be the case, then potentially building the majority of the houses close to Canterbury may actually make the transport and congestion issue worse. There is no factual evidence to substantiate the statement in the vision re this.

The normally accepted distance that makes carbon friendly travel options successful is less than 3 miles. If you inspect the map of Canterbury, the areas these dwellings would have to be built is greater than that from the city . So does that support the statement that it will lead to **a shift to more low carbon journeys?** I would venture probably not?

The majority of the proposed dwellings would by necessity have to be built on green field land to accommodate the number required. There is just not sufficient brown field available local to Canterbury within the required 3 miles. That would be against the national government direction especially at the level proposed.

Building on green field sites, despite what is stated, always has an adverse effect on biodiversity. No matter what is done to mitigate this as stated in plans. It is in effect that happens. So the statement that this option would **improve biodiversity and open space** is questionable to say the least.

Relocation of road space to bus or cycle lanes, has been shown to make the congestion worse and pollution worse. Example being in the current pandemic as Authorities dedicated road space to buses and cycles. Many of them had to be removed. As was also the case with “blockers”, where roads were totally closed. The reason being, that congestion increased dramatically and also pollution levels.

To improve low carbon journeys, needs the requirements to be provided locally that require journeys. Perhaps an obvious statement This is what makes a community, not just housing. The issue with this proposal is that if these developments are to be put in place then genuine community requirements and needs must be provided as part of that. Evidence to date shows that does not happen. The basic reason being, that developers require to maximise their profits from any developments, and that does not occur by providing community facilities. Being close to Canterbury, the argument will be put forward that they are not required as Canterbury is close? They build housing estates not communities. For example, look at the proposals for the main strategic sites under the current local plan. Consequently journeys have to be made to carry out the most basic requirements, and if they are over 3 miles away then they will not be low carbon.

2/ Canterbury focus B

This option is similar to the previous option, with the exception of an increase in housing requirement of 9000 dwellings to a number of 14000-17000. Does this satisfy the vision or what people want? Again I think not.

The reasons above also apply to this option

The main driving force for this option is the need to generate funding for the proposed infrastructure mainly a new west and east bypass. The strategy being that this enlarged number of dwellings will provide the funding, or some of the funding, for this infrastructure. The outcome stated as being a reduction in congestion. Evidence quite clearly shows that if you build bypasses they do not solve congestion, they add to it. If you put potentially 33000 more dwellings into an area, thereby doubling and more, its residential level, as with Canterbury, the effect will be significant, and there is no evidence shown to prove the bypasses will be able to cope with that increase. So again will it deliver the required result? The evidence would suggest not, if this level of increase in dwellings is imposed. The congestion could in all respect increase. Examples have shown this to be the case despite what was promised.

An estimate has not been finalised for the western bypass between Sturry & bridge. Nor are there any details as to exactly what this will require. The estimate of £100million mentioned by CCC to date seems a gross underestimate. The Sturry relief road, which includes a river and railway bridge cost is estimated at £35-40million. The proposed western bypass whatever detailed route it takes, will be approx. 7 times longer. So using very basic logic, this proposal could well be in the region of £250-280 million. As it may not be delivered for at least 5 years the actual cost could be nearer £300-350 million. Is that funding deliverable? It would appear that this has not been looked into, in that a realistic estimate for the cost is not available. So how do you plan when you do not know what you have to achieve? Until you have that information you cannot say this option is deliverable in its goals.

The current situation to date with the Sturry Relief Road, is that funding has not yet been approved but the developments have been. If that funding does not arise and that again happens here then there is a major issue to put it mildly.

This option of 14-17000 homes will require land approx. 1-1.5 times the size of the city of Canterbury. Approx 1500 hectares is required. This figure is based on the housing density of the current strategic sites under development. The majority of this land will need to be green field. Where will this land be allocated from? It is certainly not identified in the REQUEST FOR SITES as currently shown on CCC website. So how will this be achieved? Where will this land come from if it is to be centred at Canterbury? The issue of how this will change Canterbury has not even been touched on, aside from the UWHS status above. It

should be looked into in greater depth. What is being proposed is highly questionable on delivery, and highly questionable on outcome for the city in particular

When the existing 16000 dwellings already identified in the current Local plan are then taken into account, this option is frightening for Canterbury. The level of green field land required proposed in the 2 plans is excessive in the extreme, it is not what was suggested in any consultations from members of the public to date, and the true impact of this is not made clear in the vision I tender.

How has this become the preferred option? There is no evidence to suggest this is what the general population of Canterbury want. It is an officer lead deduction, based on one goal of delivering infrastructure from developer funding. It has undeliverable outcomes and total lack of understanding of public wishes and concerns. There is certainly considerable public concern about these facts and that may also prove a problem in delivering it.

I make no comment re the current issues in the South East re over development except to say it would be very wise to give them good consideration.

3/ COASTAL FOCUS

The coastal areas and communities do need development, and it should not be ignored. There is also a need for infrastructure improvement in the coastal towns, as is also the case for Canterbury.

Those who have better specific knowledge of the areas concerned would be far more suitable to comment on the exact issues.

My only comment is that the issue of how many houses is directly linked to the issues of congestion and pollution. So the more houses you build the more cars you will experience on the road network. The car in one form or another will be with us for some time in the future and that has to be accepted. More houses means more cars and the infrastructure required to deal with that must be included if the requirement is there for housing. It cannot be ignored or sidestepped by statements that this can be dealt with by low carbon journeys. The method, and that include scope strategy and funding must be clearly defined and confirmed before a suitable plan can be developed. That has not happened here in any of the options.

4/ RURAL FOCUS

Rural communities have quite clearly defined services and infrastructure. They also contribute to the ambience of the area we live in. Yes they need to grow and develop but in a way that does not destroy their existence. That is why there is so much resistance to over development. This also takes place without ensuring that the necessary services and infrastructure takes place, and also quite frequently overloads the existing services. The tend to b dwellings tend to be small in number in rural communities and, sudden

overdevelopment does not help their improvement if it is excessive. Again this is evidence based.

Local knowledge and understanding should be listened to and used to ensure that what is being proposed is genuinely sustainable, not just stated sustainable, by authorities or Developer information. This is often balanced in their favour, and not audited by the local authority rigorously. Leading badly planned, and unsustainable rural development.

5/ NEW FREE STANDING SETTLEMENT

If it is accepted there is a need for such large scale development to fund the issues in Canterbury I am surprised that this option is given so little analysis. It is one that should be considered and evaluated more than is shown and detailed in the draft vision. If the required number of houses is stated as in the vision . Then it must be seriously considered. The issue of Canterbury and its congestion and economy cannot be dealt with by just building more houses around the city. Then ending up with what could turn out to be historical vandalism and long term economic decline caused by the damage to the very specifics that support it.

D.A. SMITH

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