

CANTERBURY DISTRICT LOCAL PLAN CONSULTATION ON DRAFT VISION AND OPTIONS, JULY 2021

Response from Littlebourne and Stodmarsh Roads Community Association (LSRCA) Committee

GROWTH OPTIONS

Littlebourne and Stodmarsh Roads Community Association (LSRCA) Committee strongly disagrees with the Preferred Option (Canterbury Focus B).

To plan to build between 14,000 and 17,000 new homes is considered wrong. There is no requirement for more than 9,000 and that number itself is already criticised as being too high. The Office for Statistics Regulation has called this out as an overestimate due to miscalculations which particularly affect small cities with large student populations. Thus, the number required might prove to be less than 9,000 and needs to be questioned.

<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>

The Committee does not support the building of more homes than are required and does not support the idea of focussing on Canterbury only. It will cause even more strain on the infrastructure and the cumulative impact on the city will be damaging. There are issues with

- Traffic congestion
- Waste water treatment
- Waste collection and disposal
- Education provision
- Medical provision

LSRCA Committee believes that the Preferred Growth Option will make things worse rather than better for city congestion. Additional housing, over and above the requirements, will bring even more traffic than necessary. 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, including at pinch-points such as Tourtel roundabout by Riverside, at St George's roundabout and at St Martin's Hill/Chantry Lane junctions which would directly affect routes that are pertinent to residents in Littlebourne and Stodmarsh Roads Community Association area.

LSRCA Committee has strong doubts that the eastern bypass is a good solution in the long run. The Jacobs report, in section 11.1, clearly states 'there is no single stand out option that could be recommended for solving the existing local and strategic issues'.

This means that the eastern bypass idea is not a clear winner to solve traffic issues but it comes at the huge cost of unnecessary development, which unacceptable.

LSRCA might have some interest in plausible options for possible routes on the eastern side of the city which could divert traffic away from Fordwich, Stodmarsh Road, Littlebourne Road. However, it is not the right solution to have a major new eastern bypass funded by developers' contributions from 14,000-17,000 new developments.

The Committee believes that rather than building more roads and concreting over more land, the emphasis should be on reducing traffic requirements, reducing the need to travel, providing more sustainable communities.

LSRCA accepts the need for an appropriate level of new housing but believes that this should be distributed around the district and not focused on any particular area. There is a question in the consultation which asks, "Are there any other growth options we should consider?" The response is "Yes, a more distributed option and one which sticks to the minimum number of homes required by government, when that number has been validated according to the Office for Statistics Regulation recommendations."

LSRCA has not found the basis for how the preferred option was 'scored' versus other options, or by what principles the preferred option was decided. The Committee believes that the council should make transparent the framework that was used to assess the options in order that the consultation is properly informed. This is lacking. LSRCA does not have any understanding of how the five separate options were created in the first place. These are two important shortfalls in the evidence provided.

HOUSING AND NEW COMMUNITIES

Issue HNC1 Providing the right types and tenures of housing

The Committee believes that new housing development should include, as a priority, housing that is genuinely affordable for local people, including social housing. The Draft Options do not deal with this adequately. Canterbury City Council should investigate ways of ensuring that housing is prioritised for people who live and work in the district. This needs to include the Gypsy and Traveller communities. The Domus report has extrapolated from the 2018 Canterbury Gypsy and Traveller Assessment (GTAA) and suggested what numbers of sites will be required on average per year to 2040. Canterbury City Council should make sure the Local Plan will deliver the requirements and not leave itself open to challenge at appeal, as has happened prior to 2018.

Issue HNC3 Brownfield and regeneration developments

The Committee believes that new housing should be primarily sited 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.

HISTORIC AND NATURAL ENVIRONMENT

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

The Committee fully supports the recognition of the heritage assets in the Canterbury District. It is accepted that this is reflected in the current Local Plan and that Canterbury City Council wishes to continue this. The Committee cannot fully support the option (NE1A) to continue with the Local Plan approach because we see that it has not been effective in preventing unsightly building additions (ventilation units) on top of a University building adjacent to St Augustine's Abbey. Neither is it credible that enough regard was given to heritage assets when granting permission for Mountfield Park because this not only impacts the view as visitors arrive towards Canterbury but also encroaches on the ancient Pilgrim's Way and AONB. Therefore, the Committee feel that implementation of the principles needs strengthening. They are not effective just as words in a plan. The policies may have been well intentioned but the approach to sticking to them has failed in some cases. LSRCA Committee requests further attention be given to the heritage assets.

Issue NE4 Areas of High Landscape Value

LSRCA Committee believes that the Canterbury AHLV (the Valley of the River Stour around Canterbury) should continue to be protected in its entirety. The landscape elements are interrelated and to carve up the areas to be protected or not protected fails to keep the integrity of it, especially as this has a direct knock on to environmental damage (from which Stodmarsh is already suffering) The Committee disagrees 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.

Issue NE7 Protection of existing Open Space

The Committee believes that protection should be strengthened for Open Spaces, supports a more proactive approach as proposed, and welcomes the development of an Open Spaces Strategy. Therefore, there is support for 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.

END