

## St Stephens Residents Association response to Canterbury City Council's consultation on the draft Canterbury District Local Plan to 2045

St Stephens Residents Association members' views were sought on **five** of the draft Canterbury District Local Plan policies relevant to the area of north Canterbury where St Stephens Residents Association (SSRA) is located. In addition, residents were invited to comment on some of the content of Canterbury City Council's (CCC) Transport Topic Paper (October 2022).

**Fifteen** individual responses were received from 268 households that are members of the Association, with the following views expressed, although not everyone commented on all of the policies included in the SSRA questionnaire:

### 1. Policy SS1: Environmental Strategy for the district

All respondents (13) were strongly **in favour** of this policy although a few suggestions were offered about **changes that could be made to strengthen** some of the measures described i.e. One respondent thought that measures to deliver a minimum of 20% biodiversity net gain required for new developments might not be sufficient (SS1, point 4) and that renewable power generation should be made **compulsory** rather than just 'encouraged'. (SS1, point 6) For example, the fitting of solar panels and battery storage should be made mandatory rather than just 'actively supported' in new developments (SS1, point.6) as recommended by four respondents (31% of response):

- Should not solar +heat pumps be a necessary part of all new builds?

It was also suggested that improvements to existing infrastructure would be a welcome measure that could effectively contribute to flood plain management. (SS1, point 6)

- We already have flooding along Broad Oak Road and St Stephens Road. Drains (Victorian) need improvement along with storm water storage tanks

Other environmental strategy objectives with which members agreed, but would like to see reinforced to **strengthen** them were as follows:

Two respondents (15%) emphasised that measures should be put in place to ensure that developers comply with the undertakings and agreements that they have made (SS1 point 5)

- If the development of 300 homes takes place then rigid surveillance of the agreed measures **MUST** be followed up. We are all aware of the promises made by the council or builders to put in good environmental infrastructure then not doing it and furthermore it not being chased up.

Two other respondents (15%) thought that the objective to incorporate a minimum of 20% tree cover in new build areas should also refer to their maintenance and enhancement (SS1 point 5):

- There is little point in planting young trees if these are not protected and watered.
- Measures not only to plant trees but water them initially and maintain paths and green areas and, where possible, to connect them by green corridors

One respondent mentioned that they thought that the objective supporting the extension of Blean Woodland should also refer to protection from development (SS1 point 7):

- The Blean Woodland is an amazing Nature reserve and needs to be protected at all cost and **NOT** to be 'nibbled' away at by unsuitable development.

38% of respondents (5) agreed that the recovery of the Stodmarsh Nature Reserve should be a priority (SS1, point 3) but wondered whether this would be achievable within the context of the draft Local Plan's other objectives

- Stodmarsh should be the first priority as it is vital to the whole local plan.
- I'm not sure that the recovery of the Stodmarsh Nature Reserve is compatible with such a big expansion of housing when currently there has been a failure to cope with existing levels of sewage, waste water and agricultural run-off.
- Stodmarsh should be protected but how can it be when 17,000 new homes are planned? Will this mean hundreds of lorries driving waste back and forth? Where will this be sent?
- Removal of sewage needs to be fully taken into account. Loading onto lorries is not acceptable.

23% of respondents expressed **reservations** about the achievability of the environmental strategy as a whole:

- I agree with the environmental strategy for the district but cannot believe that the resources required will be available in the current economic climate.
- The proposals for minimum 20% tree cover, hedgerows etc (SS1 point 5), do not assist with the pollution being created across the district, and the drain on the facilities, from all additional houses.
- What would be the carbon expenditure of road and house building? (i.e. building materials and loss of green space)

One respondent observed that the plan seems to emphasise the need to reduce emissions, especially cars but that perhaps the biggest impact on the environment in the future would be achieved by the nationwide move to electric cars:

- By 2045 this (move to electric vehicles) should be largely complete. I couldn't see a mention of this.

## **2. Policy SS3 – Development Strategy for the district**

**77%** of the 13 respondents who commented on this policy said that they disagreed with the content, especially with plans to build an average of 1252 dwellings per year in the Canterbury urban area (29,325 over the plan period)

- I completely disagree with this policy. We do need more homes but not this number. Presumably, these homes will be for people moving from **other areas** and how will roads, schools, hospitals, GP surgeries cope with the additional numbers? All these services are currently underfunded and, in this recessionary period, are unlikely to fare any better for the next ten years.
- Disagree with the scale of the proposed development. Uncertain about where the additional local employment opportunities will come from.
- Entirely disagree with housing suggestion. This does not take in to account neighbouring districts and their allocation for housing which will affect us eg Thanet, Faversham.

Although **23%** of respondents were generally in favour of the development strategy described, some reservations were still expressed by these residents:

- We are opposed to point 4 because it will mean taking over farmland for the proposed new garden community. It is right on the edge of the Canterbury district and will mean that Adisham and Aylesham will effectively be joined up. (SS3 point 4)

- I am not against higher growth in housing.....But infrastructure Must be provided. Doctors, hospital, schools, internet & roads. Some Infrastructure seems to be under stress in part due to the large student population, a particular issue in Canterbury

**Concerns** with regard to pressures on infrastructure were expressed by **46%** of the respondents who commented on this policy:

- 29,325 dwellings - seems far too many for our overcrowded City, especially with its lack of infrastructure. Even 1.254 dwellings seems excessive without the essential road, water, sewerage, transport systems etc in place BEFORE building is started.
- House building should be reduced, not increased. Increased housing brings more pressure on local services.

A wide range of other **concerns** were also expressed, in connection with the following points in the policy:

Lack of resources to deliver policy SS3 point 1

- CCC have cut their personnel drastically and the Council offices have much restricted opening times. Do they have the personnel to manage these grandiose schemes?
- Pitches for gypsy and travellers is a nice idea, but who will manage and look after these?

Definition of 'affordable housing' mentioned in policy SS3 point 1:

- At what price does affordable housing start?
- I agree that all developers should allocate 30% affordable housing although how affordable they will be for families is a different question.

Allocation of floorspace referred to in policy SS3 point 1b

- The High Street is suffering now. Out of town retail should be restricted.
- Canterbury urban area is full of empty shops as a result of high cathedral rents and because plans have failed as a result of sewerage problems. The city centre is very sad with a number of failing businesses. Empty shops should be filled with independent traders (as Faversham.)

Two new coastal secondary schools mentioned in policy SS1 point 3

- Schools are required as a necessity; District residents shouldn't be held accountable for this and be told you can only have schools if you accept additional housing.

Respondents mentioned the following **changes** and/or amendments that they thought could be made to the Development Strategy for the district (Policy SS3)

23% of respondents thought that it was important for CCC to revisit the Development Strategy in order to accommodate recent changes in Government policy:

- I disagree that so many houses are planned. The city could not cope. I understand the government has back tracked on enforcing numbers so could this be looked at again?
- Disagree on number of houses to be built, especially in view of the government's recent rollback on holding councils to mandatory targets.

Concerns about pressure on infrastructure generated by CCC's proposed housing figures could be addressed by amending these allocations in line with recent estimates of population growth:

- Housing numbers should be reduced in line with historic levels of building and more recent estimates of population growth. This may require less drastic expensive infrastructure which in turn requires more housing to pay for it.
- Far more attention (should be paid) to matching infrastructure and public services to scale of development. Also population growth. This may require less drastic expensive infrastructure which in turn requires more housing to pay for it.

Respondents (38%) clearly stated that they would like to see a different housing mix in the Canterbury urban area with a much greater emphasis on social housing:

- I would love CCC to build social housing. They missed the opportunity to reduce the waiting lists when they allowed Redbridge to buy MOD housing so they should focus on social housing in the Local Plan.
- New housing should include social housing for families with affordable rents and security of tenure
- We really need more affordable housing, as many more 'small' family units. Student accommodation building should be halted.
- Agree accessible housing for elderly and disabled. Building these houses would free up homes in the area currently occupied by elderly and disabled who are able to and want to live at home but their homes are too big.
- More small units of housing in the city centre is a good idea.

### 3. Policy SS4 – Movement and Transportation strategy for the district

Two residents out of the fifteen who commented on policy SS4 expressed **support** for CCC's Movement and Transportation Strategy. (13%):

- It would be wonderful to have a smooth integral transport system through and beyond the city. I feel the system should encourage safe walking, bus, cycle routes so the Canterbury Circulation plan seems to be a good idea - however, it needs a lot of planning and thought as I am aware that many people, especially in areas outside the city centre, are very against it. Overall, I like the idea.
- Agree, reluctantly. Something needs to be done and this is as good an idea as any.

Two other residents (13%) were in favour of **some aspects** of the strategy:

- There are good points but the transport zones & the circulation scheme need a lot more thought.
- I disagree with the 'zones' policy. I do agree with improved cycle and pedestrian routes and better public transport.

Policy SS4, point 2 refers to a new 'Canterbury Circulation Plan' which provides further detail about a proposal to divide the city into five neighbourhood 'zones'. Although residents were invited to comment on parts of the Circulation Plan separately, most of the **critical** comments about policy SS4 (73% of respondents) had a focus on the 'zoning' proposal (policy SS4 point 2) which would, it was thought, be too restrictive and 'alter the character of the city':

- Highly sceptical about this. The 'zoning' proposal is highly authoritarian and controlling and seriously restricts freedom of movement. A draconian approach with no proof of success.
- Seems too radical to be achievable in the face of public opposition.

- My experience in Hackney with the Lower Traffic Neighbourhoods is that it is very, very divisive. It has caused many people from small businesses to those who are elderly or who have families a huge amount of unnecessary stress and cost.
- We think Canterbury is too small to be divided into zones.

Some concerns were expressed about the potential disadvantages of the zoning proposal requiring longer journeys when travelling by car and causing a negative impact on air quality for those living on the outskirts of the city:

- This would increase travel times and pollution in the area outside the city limits. I am sure that residents in the latter areas would be very unhappy to see a massive increase in traffic near their homes.
- Zoning could result in people travelling further (more carbon and pollution) when driving to other parts of the city. Expensive road building may require more houses to pay for it, which would mean more vehicles on the city's roads.

Difficulties that might be experienced by elderly people were also mentioned:

- This district has a large number of older people who are not disabled and therefore do not qualify for disabled parking but who are simply unable to walk for long and who cannot cycle, nor do they live near a bus stop.

The following **changes** and/or amendments to the Movement and Transportation Strategy were suggested, including recommendations for exemptions from the application of the modal filters if the idea of zoning is implemented :

- Consideration of emission reduction from the move to electric cars.  
Ring road completion in North Canterbury around the university. Especially important as this is identified as an area for growth which will cause worse congestion.  
A plan for the young/over 55s/infirm/injured who cannot cycle or walk the 2 km to City centre. That may be 50% of the population. 'Hop on' Buses are, I suspect, uneconomic as the population density is insufficient.  
Zones should all include a supermarket, doctor, dentist, school.  
Access to schools in your own zone should be guaranteed.
- Buses should be free for all school children to reduce use of cars. There should be car parks within city walls for elderly, disabled, prams etc.
- Serious concern should be paid to the transport needs of elderly people and others with limited mobility, not only blue badge holders. Also to needs of families with young children.
- Local residents should be permitted to move from zone to zone.

Two respondents thought that a road pricing scheme linked to peak periods of travel time in the city could be implemented more rapidly and effectively than the Circulation Plan (Policy SS4 point 2):

- Improved public transport links and frequency, ANPR cameras and possible road pricing linked to peak periods of travel in the city centre should be implemented before more drastic zonal solutions and bypasses are sought
- A congestion charge to be applied at certain times of the day e.g. 8.00 – 10.00 am and 4.00 – 6.00pm. This might discourage some people from driving into the city at the busiest times. This would be a much cheaper option and could be implemented far more quickly.

4. Residents were offered more detailed information about the proposed 'neighbourhood areas' designed as five discrete zones of the city from the **Transport Topic paper October 2022** about which they were asked their views. All of those who commented disagreed with the approach set out in the topic paper. Two respondents thought that the construction of eastern and western movement corridors would lead to further congestion:

- While it would be good to see less traffic on the inner ring-road, the measures seem more likely to create more congestion on the proposed outer ring road.
- The new proposed bypasses do not make long term sense and excessive house building would make them overloaded.

Concern was also expressed about the knock on effects of the proposed 'western link' that would involve an upgrade of Rough Common Road. Jacobs (transport consultants) traffic modelling reports indicate a significant increase in traffic flow on Whitstable Road and Tyler Hill Road with potential for considerable congestion occurring. This was thought to be 'disastrous'. One respondent's idea for **change to be made** to the Circulation Plan was: 'Do not implement this impractical scheme. A recipe for disaster.'

Positive suggestions for **changes** that respondents would like to see implemented were also offered, which demonstrate that CCC's Spatial Strategy for the district should prioritise reducing the need to travel by car and focus on sustainable solutions for the immediate and medium term:

- Free buses would ease use of cars plus park and ride outside the city and buses in to ease congestion. If public transport is improved and bicycle lanes improved, there would be less traffic
- A better infrastructure should be brought in eg yellow mini link buses which ran every 15 minutes; an annual city bus pass at a reasonable price, encouraging people to use buses.
- Disabled access across the city. Maybe disabled vehicle lanes/taxi lanes; bus lanes; cycle lanes.
- Consider congestion charging, initially linked to peak traffic times

## 5. Policy C26 – Land north of University of Kent

Four of the twelve residents who commented on this policy (33%) thought that there was insufficient detail to make an informed decision about what is planned, while four respondents were in favour of the proposal:

- The University needs to adapt to changing times and demands. I hope the lovely green corridors and spaces can be maintained.

The University of Kent land provides important and valued open spaces for the local community to use for recreation. Consultation with the local community around development of the Canterbury Campus Framework Masterplan in 2018-19 led to a commitment by the University of Kent not to build on the southern slopes. This commitment, however is not mentioned in CCC's Open Space Strategy, which is an omission that SSRA would like to see rectified.

Three respondents (25%) disagreed with the proposal to build a new garden community on the University of Kent's northern landholdings, which it was thought needed more detail, since significant information such as the location of the 'northern movement corridor' that is referred to in this policy are lacking. The valuable suggestion about the need for a proper strategy around the proposed developments in the north of Canterbury is a point that SSRA would be keen to promote:

- CCC needs to be clear with UKC what is permissible & when. Infrastructure must come with any further expansions at UKC. That should include parking!
- I like the idea of further expansion of the UKC site , but this needs to come with a **proper strategy** for the City & the area of North Canterbury.

## 6. Policy R26 – Broad Oak Reservoir and Country Park

Thirteen residents commented on this proposal and were generally in favour of the plan, with some reservations expressed about sustainability of water supply and provision of road infrastructure. Five respondents agreed on the need for a reservoir which has been talked about locally for many years:

- I agree with this proposed development. It was first mooted in the seventies and was abandoned because of local pressure groups. This was a terrible error as the water supply is under great pressure from existing demands and this will only get worse, particularly if CCC presses on with its plans for more housing.
- A reservoir is an excellent idea – much needed during long hot summers when the aquifers are running dry
- There is a long established need for a reservoir.

However, questions are raised about whether it would be possible to fill the proposed Broad Oak Reservoir when water supply scarcity increases in the future as a result of climate change:

- It was originally proposed to fill the reservoir from the Stour. How long would this take now and would the Stour be able to maintain water usage?
- Generally in favour, so long as supply from the Stour is sustainable and there is adequate car/cycle parking

The need for investment in infrastructure to make the proposed policy achievable is mentioned by three respondents:

- I just don't know if this is deliverable. It's a 50 year old idea , now with a landfill all around. Can this be transformed? If it can , it would be positive in my view.....but again you need infrastructure = roads. I can't see kayaks being taken on a bus!
- Excellent idea but needs transport and road connections and inclusive of up market leisure facilities for people to enjoy!

Possible **changes that could be made** to Policy R26 include a request for further information about the diversion of the Sarre Penn alluded to in relation to 'development mix' (R26 point 1a), plus an innovative idea for accessing a source of water to fill the reservoir at times of water supply scarcity:

- How would the Sarre Penn be diverted?
- I understand there is also a plan for a de-salination facility on the north Kent coast. Would the two be linked e.g. to store desalinated water?

I would like to thank St Stephens Residents Association members who contributed to this consultation for their well-judged thoughts and creative suggestions that will enable SSRA to respond to Canterbury City Council's consultation about the draft Canterbury District Local Plan to 2045.

Jennifer Holland 09.01.23