

The Canterbury Society

RESPONSE TO THE DRAFT LOCAL PLAN: AUGUST 2013

CHAPTER 1 INTRODUCTION

The Canterbury Society is grateful for the chance to respond to the Council's draft Local Plan. What follows is the collective view of the Canterbury Society's committee, which aims to represent the view of the Canterbury Society's wider membership of several hundred local residents.

This Canterbury Society is concerned with the overall quality of life in the city as it affects its permanent residents. Prior to the release of the draft Local Plan, the Canterbury Society published its own *Residents' Vision for Canterbury* (2013) which set out proposals for the future of the city based on extensive input from local residents' associations and makes 84 recommendations for action. The comments in this submission should be read in the context of the findings of the Vision, which imagines a city that:

- Balances the need for economic development with its social and environmental needs
- Places a high premium on the natural environment and open space.
- Upholds good design, energy-efficiency and social cohesion in urban development
- Protects its historic architectural heritage
- Sees a large-scale shift away from private cars towards public transport, cycling and walking.
- Minimises anti-social behaviour and preserves night-time peace for residents
- Reduces the impact of student life on the city centre whilst promoting the overall development of the higher education sector
- Achieves a better balance between retail provision for residents and visitors
- Fully incorporates the views of residents into the governance process, especially with regard to planning and housing development

In this context, we are glad to say that there is a great deal to commend in the draft Local Plan. We are particularly pleased with the recommendations for the local economy, with the emphasis on developing high-value sectors and stemming the graduate brain drain out the city. We support the recommendations of the transport chapter with its emphasis on cycling and public transport, and a reduction in the impact of cars. We welcome the attention the Local Plan gives to the natural environment, including the provision of open spaces, landscape and biodiversity. And we are gladdened by the proposals for the heritage and built environment, which recognize the value of Canterbury's architectural inheritance and the need to preserve the inherent character of the city in any future development.

At the same time, there are some elements of the draft Local Plan about which we are concerned. Above all, we are troubled by what we see as a misplaced connection between economic development and mass housing development. The Canterbury Society supports economic development and we recognize that a larger population implies a larger citywide GDP, and therefore brute growth. However, we see no causal link between more people *per se* and higher GDP in *per capita* terms, which should be the ultimate goal of an economic strategy. At risk is the possibility that a large swathe of the city's green environs will be urbanised and the character of

the city changed irrevocably, without actually raising the level of individual prosperity in the city. In our view, rather than contriving to develop the economy by building additional houses and business space, the Local Plan should instead give primacy to the goals of good design, green spaces, a clean and safe environment and good local amenities. These together will be sufficient to attract the entrepreneurs and professionals that will provide the high-value sectors which the Local Plan rightly identifies Canterbury as needing.

Our other main concern is about the risk of failing to implement some of the very good recommendations in the Local Plan, especially with regard to design, heritage and green spaces. It is not just that the Council's past track record gives cause for concern. We also see little evidence in the Local Plan of how the Council will properly ensure conservation with so few resources; how it will ensure that new development is of a high aesthetic standard; and how it will enforce the protection of green spaces, to take but three examples.

Beyond this, we see a number of significant omissions in the Local Plan, mostly in relation to the goals of promoting the environment and community, which a revised Local Plan needs to address head on. We have yet to be convinced that the development of the Plan will be genuinely democratic and note that the consultation process is following the publication of the draft, rather than preceding it. We are worried about the evidential base for some parts of the report, especially the Jacob's report on traffic modeling which uses a flawed methodology and reaches conclusion which are unsupported by the preceding analysis. And we consider it vital that the Council urgently publishes some of the referenced supporting documents, above all the Transport Strategy, on which parts of the Local Plan are predicated.

In each of the sections that follow, we have presented our ideas as follows.

- First, we have made general comments about the topic of the chapter.
- Secondly, we have provided analyses of specific paragraphs in the Local Plan.
- Thirdly, we have stated what we consider to be missing from the Plan and set out the additional proposals that logically follow from this.
- At the end of the submission, Appendix 1 offers an extended analysis of the proposals for housing
- Appendix 2 sets out a critique of the VISUM traffic and transport model.

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CHAPTER 2 HOUSING

A more detailed response to the Housing Chapter is given in Appendix 1, page 27.

General Comments

Canterbury is a small, historic cathedral city and its architectural and cultural heritage is its principal economic asset. Any development should protect and enhance these advantages. The universities and tourism both depend on maintaining the charm of the historic city.

The city is currently prosperous but over-stretched, with heavy levels of traffic congestion, air pollution and over-crowding generally. It is essential to concentrate most future growth away from Canterbury itself, if the deterioration in the quality of life is to be halted. Moreover, the majority of new housing should be located with easy walking distance of an improved public transport system. We recommend siting new house-building along the two rail routes radiating from the West and East stations, and along the bus routes that link the city to Whitstable, Herne Bay, Thanet, Dover, Ashford and Faversham. There is sufficient land within walking distance of these routes to service housing needs for at least 20 years.

We recognize the implicit difficulties in the New Homes Bonus scheme, which effectively makes sustained central government funding for the Council conditional on house-building. However, building 780 units of housing per annum is excessive given the constraints imposed by the historic character and setting of Canterbury and will lead to damaging impacts on the city. We support the provision of 580 units per annum over the plan period, which can be accommodated within the Council's SHLAA List without the need for an additional 4,000 houses in South Canterbury. In this context, we note that some councils in Kent are exercising significant restraint in house-building, for example, Sevenoaks which plans an average of 165 homes per year until 2026. In our view, the proposed 4,000 house allocation in South Canterbury is unnecessary and should be scrapped. Instead it could be identified as an area of further investigation and public consultation, along with Thanington, if additional housing became necessary in the second half of the Plan period (2021 to 2031).

The draft Local Plan makes a number of false assumptions

- The assumption that mass house-building will galvanise economic recovery is unproven. Increased house-building is the result of economic growth, not its cause.
- The Ipsos Mori Report does not prove there is popular consent for house-building at a rate of 780 a year. Whilst 58 per cent backed building in principle, 70 per cent of residents were opposed to development on green field sites.
- The methodology used to support the Draft Local Plan is flawed. The Nathaniel Litchfield Report arbitrarily downplays the importance of pledges in the Corporate Plan 2011-13: 3 (build houses in the right places), 4 (reduce traffic congestion) and 7 (support cultural facilities). In addition, it interprets in narrowly economic terms the meaning of 'the right type and number of homes', ignoring the importance of environmental and social factors.

- The proposed level of house-building (780 a year) does not follow from the analysis. According to the NLP Report, the number of jobs in the Canterbury District is currently 72,427 and between 2011 and 2026, NLP forecasts that employment will grow by 4.7 per cent. Extrapolating forward, this implies that employment growth for the full 20-year period of the plan would be 6.25 per cent, which equates to 4,526 new jobs. Alongside this, data from the 2011 ONS census indicate that there were 63,859 dwellings in the Canterbury District housing 71,322 economically active people, giving a ratio of 1.16 workers per dwelling. Also, as the Nathaniel Litchfield Report notes, 26 per cent of new jobs are taken by people living outside the District (1998-2010). On this basis, there is only a need for 144 new homes pa.
- The Council has provided no evidence of having collaborated with other planning authorities on housing numbers and locations as required by NPPF. The four adjoining authorities, Ashford, Dover, Thanet and Swale, are not as over-stretched as Canterbury and each of these authorities has large housing allocations which have not yet been developed.
- There is no evidence that the Council has taken account of sustainability, as required by the NPPF, to support its decision on housing allocation. This would mean giving priority to building on brownfield sites, ensuring that the necessary infrastructure is available, attaining the highest level for sustainable construction (Level 6), and insisting that buildings are well-designed and that local communities are supported.

Comments on the Local Plan

2.17 – 2.31 Strategic Requirements

Level of Housing provision in Relation to Past Rates of Completions

The average annual rate of housing completions over the previous 21 years was 545pa (but declines to 484pa when adjusted for the spike in the figures in 2007/8 and 2008/9). The proposed provision of 780 units per annum is therefore not supported by the figures achieved over the previous 21-year period, which included the largest property boom since World War 2.

Level of Housing Provision in Relation to Population Growth

There appears to be no correlation between the Council's proposed provision of 780 units per annum and the requirement for 433 units based on the population growth forecast in KCC Strategic Forecast (Nov. 2012)

Brownfield Sites

By not allocating the former colliery site at Hersden, the largest brownfield site in the district, the Council would be ignoring its own evidence to the NPPF consultation in October 2011 that: "Notably the Draft NPPF omits the existing policy that 60 per cent of homes should be built on previously developed land.....the principle of Brownfield land in preference to Greenfield land wherever possible is important to ensure efficient use of land." Unless this issue is tackled in the Draft Local Plan there is a real danger that the Plan may be declared contrary to the NPPF and sent back for further consideration. Hersden itself would welcome, and would benefit from, the inward investment that development here would produce.

Strategic Housing Numbers and Locations

Based on our assessment of the evidence for employment and population growth we conclude that an annual rate of 580 units per annum would be sufficient to achieve

sustainable growth over the plan period. This annual rate is capable of being provided on land already identified in the Council's SHLAA List and the 4,000 houses proposed in South Canterbury are therefore unnecessary to meet the Council's Corporate Plan objectives.

2.23 Finally, we strongly oppose the proposal to place residential development on Kingsmead Field. This is contrary to the Council's own policies, as stated in the draft Local Plan, namely Policy OS8, Policy OS11 and Policy CC5:

Policy OS8 states that: *'Development which would involve the loss of open spaces and play areas within residential areas which contribute to the visual or recreational amenity of the area will be refused.'*

Policy OS11 states that: 'Proposals for new development should ensure that... existing green space is protected and improved'.

Policy CC5 states that: *'On sites that have not been previously developed within the Environment Agency's Zone 2 and 3, no development will be permitted unless an exceptional justification can be demonstrated.'* (Kingsmead Field is classified by the Environment Agency as being within an Area at Risk of Flooding).

2.32 – 2.31 Range, Mix and Affordability

Affordable Housing

Government statistics provide data about the housing problem in Canterbury. The numbers of households on the local authority waiting list has increased dramatically since 2011. While the housing waiting list remained around 3,500 from 2008 to 2011, in 2012 it soared to 4,588. This is the largest waiting list in Kent, with the exception of Thanet. The high cost of local housing is reflected in the fact that nearly 13,000 people claim either Housing Benefit or Council Tax support.

There is a systemic problem with providing the level of affordable housing that is needed both locally and nationally. This problem can only be resolved when national government takes the decision to make this provision a funding priority. Until then the proposals in the Local Plan to provide three affordable houses for every seven private houses, at the developers' expense, can only be an interim measure which will not be sustainable in the long term. Not relevant

2.65 – 2.74 Houses in Multiple Occupation and Student Housing

This is a major concern amongst residents in the City and one which the Local Plan does little to ameliorate. We recommend that the Council look sympathetically on any proposal to build additional student accommodation, respecting the need for good design and protection of green spaces, in order to reduce pressure on traditional residential housing. In doing so, the Council could meet its target for units of housebuilding without the need for mass construction in south Canterbury and other areas. The Council should also examine how other university cities (e.g. Oxford) have addressed problems of student overspill into residential areas, and draw lessons relevant to Canterbury.

CHAPTER 4 TOWN CENTRES

Comments on the Local Plan

The ancient city centre is one of the most important historical sites in Britain and our vision is to see the heritage of Canterbury actively preserved within a vibrant town centre that serves the needs of residents and visitors alike. While there are some positive suggestions in this chapter, in general it is predicated on the needs of businesses (retails, offices, leisure) and the capability of Canterbury to attract shoppers, with no acknowledgement of the needs of residents (particularly those living within the walls). Even if the town centre were taken to mean just the high street, many people live just off the high street, on dispersal routes, and thus what goes on in the high street impacts on them as well.

4.16 We take issue with the comment on the appearance of many A3 (restaurant/café) venues in Sun Street as potentially damaging as it 'may reduce the draw of pedestrians through these areas to the detriment of nearby shopping streets. It is important that the sub-regional attractiveness of Canterbury as a retail destination is preserved'. Having a cluster of successful, high-end restaurants and bars a short distance from the Marlowe Theatre, while not taking up any of the valuable retail space on the high street, is good. Any plan for the town centre needs to take a wider view than that of a sub-regional shopping centre. Not everyone who uses Canterbury town centre is a visitor whose sole aim is to shop. On the other hand, the cluster of tourist souvenir/gift shops (mostly selling London rather than Canterbury souvenirs) around the Butter Market has tarnished the charm of this area.

4.44 We support the improvement of the town centre offering 'to focus on quality and specialist retail and leisure operators' with the development of a satellite retail area in Wincheap with capacity to cater for chain stores and larger stores (particularly those that need to be supplied by large lorries). However, we would want to see proper pedestrian and cycle access. Proximity to the Chartham–Canterbury footpath is cited (**4.45**), but stretches of this footpath are routinely flooded and impassable in winter. We would want to see proper pedestrian access that is usable in all weathers and enables pedestrians to get from the bus and train stations to Wincheap safely and easily.

4.55 We support the idea of improving the pedestrian environment between the St George's and Wincheap roundabouts. At present there is a pedestrian crossing (with lights) at the bottom of Old Dover Road, which enables students to safely cross from Augustine House to the new student development in St George's Place. However, the meeting point of Old Dover Road and the ring road is a very busy intersection and the pedestrian lights add to the traffic congestion. As the pedestrian footfall is likely to increase with student accommodation being built on Rhodaus Town, we would like to see this issue tackled, perhaps with an underpass or an elevated crossing so that students are safe and this intersection doesn't become an even greater pinch point. As there is likely to be significant development at the old Peugeot site (new student accommodation covers only part of the site), now would be an appropriate time to plan the redevelopment of this part of the ring road, particularly with a view to improved pedestrian access between Wincheap, Canterbury East, Rhodaus Town and the city centre. A wide, safe, tree-lined avenue would provide an attractive route and help offset air quality issues that plague the ring road.

4.59 Active planning needs to occur to remedy Canterbury's low-quality leisure offering, especially for young people. Canterbury is poorly served by sports facilities and the nightclubs are not highly regarded by the people who use them (or might

want to use them) and seen as a source of nuisance by residents living in and around the town centre. The buildings used by nightclubs are not purpose-built and are often close to residences and main shopping areas. The resulting littering and damage to business premises costs the council in cleaning bills and policing and creates a poor impression for visitors.

4.62 Disappointingly, only two sentences are dedicated to the issue of the night-time economy and the noise nuisance (and anti-social behaviour) that often follows. People living in the town centre (or near the ring road) are often on the dispersal routes of pubs and clubs and consequently residents can have their quality of life significantly diminished by late-night noise, vandalism (particularly to cars), fighting and littering. The document states that 'it is reasonable for such uses [pubs and bars] to be included within town centres, provided they are sensitive to the proximity of homes and measures are put in place to minimise disturbance'. There is no explanation as to what measures are to be taken and how they might effectively be policed. Although this is a licensing issue and the Local Plan is a planning document, there are opportunities to address problems caused by the late-night economy through planning. The Local Plan is an opportunity for the council to designate an area on the edge of town (possibly part of a business/development park) as a site for a sports centre, cinema complex, restaurants, bars and nightclubs provided with a dedicated bus link and cycle path to the centre of town or to other public transport links. The bus link may have to be subsidised by the council but could be offset by the reduction in costs mentioned above.

The appearance of the high street (and other retail/business streets) is crucial not only to the commercial success of an area but also to whether residents take pride in their town and enjoy living there. This document does not contain a clear statement regarding the council's stance on cleanliness, removal of graffiti, paving, tree planting, provision of toilets, policies regarding temporary usage of vacant shops (pop-up shops, possibly involving temporary change of use), or the quality and maintenance of street furniture. We think the council should be expending its efforts on the streetscape, in particular shop fronts. Despite its World Heritage status and the presence of historic buildings on the high street, the tacky, brightly coloured and lit signage and overall appearance of some shop fronts, particularly towards the Westgate (Mega-Fone, Tacos Locos), presents a negative impression of the town centre. Shoppers and tourists alike are looking for a charming, historic, well-preserved, clean streetscape. This document does not contain any views let alone regulations regarding the design of new shop fronts or the preservation/maintenance of ones on historic buildings.

CHAPTER 5 TRANSPORT

Note that a more detailed analysis of the VISUM model is in Appendix 2, on page 39.

General Comments

Transport is a key issue in terms of making Canterbury a better place to live. Almost every proposal and policy in the Local Plan depends on transport provision to determine its success. We very much welcome much of the substance of this transport section and are pleased that the Council appears to have put great emphasis on Lynn Sloman's (2013) *Sustainable Transport Study for Canterbury*.

Underlying this whole chapter there is the presumption of a transport hierarchy, so that most importance is attached to walking, with importance reducing respectively for cycling, public transport, Park & Ride with car travel at the bottom of the hierarchy. Given that this hierarchy is so different from what has happened in this district in the past, we sincerely hope that the Council is able to maintain this approach throughout the Local Plan period. Other aspects that we find favourable include the phasing out of inner city car parks over the planning period, the willingness to give preferential consideration to cyclists and the aims of reducing the demand to travel. Pursuing this approach to transport planning should result in considerable enhancement of the city's ambience.

While there is much to recommend in the draft Plan, there are some transport proposals that concern us and which we are certain could be much improved. For example, despite the fact that the car is portrayed as being bottom of the transport hierarchy there is much in this plan that gives the appearance of being 'car-centric'. Thus we would take issue with the large new traffic interchange on the Bridge side of Canterbury, which is neither necessary or an optimal use of resources. Also, there are no policies in this chapter to address vehicle produced-air pollution; the Council has failed to produce a Transport Strategy and the supporting documentation on transport is very dated; finally, the VISUM transport modeling, upon which so many strategic decisions depend, is flawed.

Following a comprehensive analysis of the Jacobs (2012) *Canterbury VISUM Model: Draft Option Testing Report* by one of our members, it is clear that this Report is inadequate and has presented the City Council with a false impression of the likely traffic situation under various modelled scenarios. The summary presented on page 30 of Jacobs (2012) in no way reflects the objective data presented in the report, and the recommendations as to best Option for the Council are completely at odds with the evidence. It is clear that the modelling will need to be re-calibrated and run using up-to-date data including that pertaining to the present development plans of the City Council. At the present time the Council is totally without reliable traffic data upon which to base major road, housing, employment and retailing developments.

Comments on the Local Plan

5.20 This paragraph states that, "It is clear that merely building more roads to meet demand is unaffordable, would be opposed by local residents, threatens the historic fabric of the City and would generate increased traffic elsewhere on the network." We agree this is the case but the statement contradicts Policy T1 which says that the Council will seek "the construction of new roads ... which will improve environmental conditions and/or contribute towards the economic well-being of the District"? This begs the question why there are proposals for new A2 slip roads, a new traffic

interchange near Bridge, new bypasses for Sturry and Herne, and why the Council has set land aside for an eastern by-pass of the city.

5.25 This states that Table 1 shows seven strands into which the Draft Transport Strategy is broken. Table 1 shows only four strands. However, we guess that the 7 strands might comprise of Tables 1 and 2 together, though the headings are not the same in each. And in Tables 1 and 2, it is not clear how the “Headline Aim” column relates to the other three columns. This should be clarified

Policy T2 needs to be strengthened with the addition of: “Complete linkages along cycle routes will be designed into the present cross-city cycle routes.”

Policy T3 should be strengthened to read, “The Council will, along with the bus operators, seek to extend the bus routes within (and between) local District Council areas?”

Policy T4 We are not convinced that policy T4 on rail improvements is serious. This is because similar statements could be made with respect to almost any of the proposals or recommendations made in the Local Plan.

Policy T5 We take issue with the fact that a new P&R is needed at Harbledown, which is within one mile of another P&R designed to serve the same inflows of traffic, coming from the London direction on the A2. It is also inappropriately located next to a school and a conservation area.

Missing Elements and Additional Proposals

a) There is an almost complete lack of any Council led, reliable and up-to-date documentation on transport although, throughout the chapter there are hints that a Transport Strategy is in progress but is not yet available. It is frustrating to know that this non-available strategy is influencing policy, e.g. see paragraph 5.19, and that conclusions are being drawn from it. Of similar concern is that nearly all of the documents on the Council’s web site listed as relevant to Transport are relatively out-dated and the only recent Council document, i.e. the Jacob’s (2012) *Transport Options Modelling Report* on traffic modelling, is unreliable. The only really useful transport reference was Lynn Sloman’s report (2013), published by the Canterbury Society. Given that transport is probably the single most important topic underlying the whole of the Local Plan we consider that this situation is far from satisfactory.

b) It is surprising to find that almost no reference was made to air pollution in this chapter, given that transport is the over-riding source of all Canterbury’s pollution. This issue has been discussed in Chapter 12 where a reasonable explanation of the current situation was given. However, of great significance is the fact that the Council has no Policy in its Local Plan to address this issue. We state this because NO² from vehicle exhaust emissions are now known to be a major health hazard to children, and recent research has found a very high correlation between NO² levels and the incidence of severe heart problems being exacerbated for people with weak hearts. Additionally, the Council is obliged to meet EU NO² reduction levels by 2015.

c) For many years now the Council has had an assumption that the A2 slip roads will prove a solution for many of Canterbury’s problems. This is a function of the fact that the highway authorities have said that many of the Council’s business and housing proposals should not go ahead without better access to the A2. We are generally of the opinion that none of the A2 slip roads will be beneficial to the city. We have carried out private surveys that reveal that the new Wincheap A2 slip road serving the London direction carries far more traffic coming down Wincheap to use it than

traffic coming up through Thanington to access it. Hence the proposal is likely to create more traffic on congested Wincheap. The Jacob's (2012) report notes their Option 1 modelling shows that new housing developments in SE Canterbury are likely to increase traffic on Wincheap. And of course any A2 slip road allowing traffic to exit the A2 at Wincheap can only serve to increase the volumes of traffic in this area. Additionally, the proposed A2 Bridge interchange is unlikely to have sufficient benefits to make it viable. The existence of this interchange is more likely to encourage private vehicle use in the area since it offers a ready access to road travel. Since any new interchange would almost certainly be built at the point where a potential Canterbury eastern by-pass would intercept the A2, then if these developments were to go ahead, they would almost certainly be built in unison. Finally we note from the Local Plan mapping that provision has been made for reserving land for the Eastern by-pass. However, the land has only been reserved as far south as the Canterbury/Dover rail line. After this, land reservations would need to be made along a wide strip going almost through the centre of one of the large areas designated for housing in the Local Plan. The city Council needs to provide evidence, and state objectively, exactly how all new A2 slip roads will ease the traffic congestion in any parts of the city, especially in the Air Quality Management Areas.

CHAPTER 6 TOURISM

General Comments

Tourism is clearly important to Canterbury's economy. The fact that most visitors come for the day and do not stay overnight has often been noted: why this should be so and how best to encourage longer stays needs further enquiry. The success of the new coach park at Kingsmead and an increase in the number of young visitors and student groups from the continent deserves investigation. What the numbers are, how much employment is sustained and how other kinds of visiting contribute, requires reliable figures and analyses to be a secure basis for planning.

Comments on the Local Plan

6.2 - 6.8 rightly mention the importance of the arts, architecture and music for attracting visitors. The High Speed train is a notable improvement – though it might take visitors away rather than encourage longer stays – and the Visit Kent website and Explore Kent initiatives are valuable. We have been slow, however, to develop and publicise these, by contrast with regions in France, such as Picardy for example.

6.9 mentions rural tourism and visitor facilities, but with no indication of what these are or might be like. Information is the key here. Canterbury needs a revived **Tourist Information Office** in a central location, preferably near the cathedral, and perhaps a **Pop-Up Shop** in the summer season. French websites seek to encourage visitors who have rural or related interests through on-line 'pathways' often linked with accommodation suggestions.

6.18-19 on **Cultural infrastructure** outlines the wealth of what is available but makes no practical suggestions such as improving the signposting to **The Poor Priest's and Roman Museums** nor does it suggest scrapping the off-putting entry charge for the former.

6.20-25, on **Public Art**, could include valuable reminders, for example of the vibrancy of the Horsebridge Arts and Community Centre in Whitstable, the Wise Words Festival or the contribution made by the Canterbury Commemoration Society. We would recommend new displays, for example of sculpture during Festivals, such as used to be mounted in St Augustine's and elsewhere. There could also be more support for Canterbury in Bloom.

6.26 and following, puts forward a need for more top-end hotels, partly on the ground that business has to be turned away in the summer months. This could well be a way of promoting longer stays, for county cricket, university visits, attendance at festivals and so on. The criterion for a good standard of design of new hotels is welcome.

Promoting Canterbury as a destination for weekend breaks, with advertising aimed at older people and those from London and the south east, could bring in visitors who would stay longer and spend more.

6.44 rules out the need for Marina development. This ignores the tourist potential of existing watersports facilities and the advantage of promoting them. The Chartham Lakes must offer potential in this respect.

6.51 support for rural tourism, holiday lets and so on, is to be welcomed and could well be of value. However, the Plan should contain practical proposals for promoting sites and activities, calendars of events and attractions and the means by which these are co-ordinated; how visitors' experiences to be made 'distinctive'; and the

role and capability of the Council.

Finally, let us build on what does work well such as the **Official Website – Visit Canterbury**, despite its omissions of some museums, camping facilities, and public transport including national coach services.

Missing Elements and Additional Comments

Little is said in the Local Plan about cooperation between Canterbury Cathedral and other organisations in the city. Yet the Cathedral is the reason why many tourists visit the city and their first port of call. It would be good to see a set of policies focused on this issue. For example:

- Discussions should take place between the City Council and the Dean and Chapter so that groups of visitors could be encouraged to go on from the Cathedral to visit the museums and galleries in the city; this might be especially relevant for groups of school children
- Receipts given out in the Cathedral shop should include a reduction on the entry fee for museums, and information about what is available in the city
- A greater focus on the World Heritage Site might encourage Cathedral visitors to go on to St Augustine's Abbey and St Martin's church

Other ideas for enhancing the tourist experience might include:

- A Tourist or City Pass, giving access to a number of attractions
- Joint and family tickets for several venues
- More free maps, information leaflets and business vouchers
- Themed tours related to historical periods, perhaps drawing on the advice of university-based experts
- Better-managed civic and green spaces, and a focus on the River Stour as a location for leisure and pleasure
- An alternative coach park in Longport, to relieve pedestrian congestion along the river and to increase the numbers of visitors to St Augustine's Abbey.
- Creating a more attractive route from Canterbury West station, through the Westgate and up St Peter's Street, for example by extending pavements, adding floral displays, and removing unsightly shop fronts, would release the potential of this historic route into the city.

CHAPTER 7 CLIMATE CHANGE

General Comments

This chapter contains a large number of well intentioned ideas including evidence that many of the recent advances on climate mitigation and adaptation have been addressed, and that the Council is using its past experience with flooding situations to good effect. However, we are concerned that a number of major points have received insufficient attention. Especially important here is the need to address the poor energy efficiency of much of the existing housing stock, the urgent need to improve water quality across some of the District, the wider impact of climate change on the District and its people, and the need to improve the ecological footprint of the city and protect water supplies.

Comments on the Local Plan

a) The first bullet point in the box on page 144 entitled **Responses to Climate Change**, (under the heading “Action to reduce the Canterbury’s District’s impact on climate change”) is “giving priority to development in urban or edge of urban locations that are well served by sustainable forms of transport”. This is inconsistent with the objective of building 4,000 houses in SE Canterbury when, as part of this deal, policy SP3a says that new infrastructure development needed is a “New junction onto the A2 and modifications to the existing junction arrangement”. This is effectively to give priority to possibly £40 million being spent on the least sustainable form of transport, i.e. road development. Recall that paragraph 1.41 says that the Council is “looking to locate development near existing transport hubs” – this new junction does not actually exist, and it will mainly serve to encourage car use, and thus further contribute to climate change.

b) Paragraphs 7.5 to 7.18 are concerned with climate change mitigation or adaptation as it is relevant to built developments. However, the discussion relates exclusively to new developments. Despite the fact the paragraph 7.3 notes that the NPPF requires planning authorities to “actively support energy efficiency improvements to existing buildings” the draft Local Plan ignores existing buildings. As many District Councils throughout the UK have found, addressing the deficiencies in existing buildings is an excellent means of addressing CO2 targets in the District, or of improving the standard of comfort within dwellings, and of improving the health of many local residents plus increasing employment prospects in the energy improvement sector. The Council should address what it intends to do to reduce energy losses from existing buildings.

c) We welcome the recognition in paragraph 7.58 and Policy CC12 that there is a need to improve water quality and the ecological status of local waterways. But the Local Plan makes no suggestion about measures the Council should take to ensure that water supply companies and the Environment Agency improve the quality of the water supply.

Missing Elements and Additional Proposals

a) The Plan needs to include a policy covering “water supply and resource protection”, i.e. as well as the policies covering water quality and water infrastructure. While we think that the facts relating to these water points are well understood by the Council, they need to be articulated in Policies. For example, under the heading “Water Quality, Water Efficiency and Water supply”, there should be a policy commitment to meet the Water Framework Directive targets by the year 2015.

b) There is nothing in this chapter about the City Council having targets for CO2 reductions and for the city's eco-footprint reduction. Thus, for instance, in 2007 Canterbury was ranked as the =5th worst city in the country with respect to its eco-footprint, i.e. with the city then having a level of resource consumption equal to 3.4 planets. There is no mention in the Local Plan that this poor situation is being discussed or addressed, and in fact this extremely negative point seems to have been totally ignored.

c) We propose that the City Council offers free (or subsidised) energy audits for all existing householders. This would encourage local investment in energy saving measures thus generating local business and creating jobs, as well as helping the City Council to reduce CO2 emissions and to better achieve emissions targets. Alternatively, the Council needs to promote the government's Green Energy deal which commenced in January 2013 (see gdcashback.decc.gov.uk), and which provides home owners with cash saving incentives to invest in a range of energy saving installations.

CHAPTER 8 DESIGN AND THE BUILT ENVIRONMENT

General Comments

Most of the direction of this chapter is welcomed. However, previous similarly well-intentioned aspirations have not been delivered. To a large extent this is because the lack of commitment by developers has not been satisfactorily controlled by the systems in place at the City Council. No attempt appears to have been made to see where and why past schemes failed. Unrealistic promises are made and we cite as an example, the first paragraph which states that “the City Council will promote the use of skilled designers to help deliver the vision”. It is not clear how this is to be achieved. Who will identify the “skilled designers” and surely the City Council has to accept all valid Planning Applications? Skilled designers, in any case, can be constrained by clients to produce poor work, and may not oversee the works, leading to the built result not conforming to the plans. Historically the City Council has not always taken enforcement action in such cases.

Comments on the Local Plan

8.2 and 8.17-8.19 Good design policies have been in place in the past but have not delivered what was promised. They must in future be reinforced by greater Council input.

8.10 It is noted that the location and extent of the development sites put forward in the DLP have not been subject to such rigour and are not tested against the Draft Landscape Character and Biodiversity Appraisal 2012, which is a supporting document to the DLP

8.11 Sustainability should include the encouragement of local developers/builders which would also promote some visual diversity. We note that this is the case at Poundbury Dorchester and New Hall, Harlow, but does not happen in Canterbury.

8.20 and 8.24 Members of the Development Management Committee should have more design experience encouraged by visits to a variety of developments. Garden Cities and Suburbs could provide an historic context, especially as this concept is flagged up in the DLP.

8.21 Reference to ‘past’ design having ‘high quality’ is vague. The twentieth century, during which the Planning System developed has, nationwide, produced some of the worst design ever. Have, as is postulated, expectations of design been rising over the past decade?

8.22 Materials and colours used in buildings have not been specified by CCC with enough care. Too much conformity has been in evidence within schemes that are intended to look as if they have arisen over a long period. Planners and architects seem to have a default position of consistency which is quite alien to such design briefs.

Policy DBE3 At (h) should include the need to site housing away from noisy, high speed roads. It is noted that the DLP housing sites take no account of this. Recent housing can be seen adjacent to the A299 and the A2 at Wincheap and such locations should not be repeated. Business use is much more compatible with the background noise of traffic.

8.25-8.29 It has been seen that development applications have often been validated by CCC with inaccurate or misleading drawings. This has often not been addressed during the Planning process. One example is CCC's own last application for extending Tower House where the adjacent trees were not shown. At 8.29 the DLP asks for photographic evidence, but the document itself is completely devoid of illustrations.

Isometric drawings should be mandatory for such schemes as Whitefriars or the Churchill site in St Dunstan's Street. In each case this omission has led to ridiculously short ridges behind gables in some parts. It is noted that the City Council was the client for Whitefriars.

Application drawings often fail to include descriptions of materials. This information is hidden away in documents and is thereby less easy to spot and enforce.

8.35 We welcome the emphasis given to the effect of skylines. Whitefriars from both near and far shows an inappropriate visual profile. Rear elevations are often poorly conceived and yet they can have a huge effect on their setting. We cite the contrast of the carefully thought out front of the Marlowe theatre with its gross and out of scale rear. Again this was a City Council project.

8.40 The very intrusive pack house at Chartham for Mansfields contradicts the thrust of this policy.

8.42 We note the dominance of developers' continual use of a 2.4 metre ceiling height, no matter in which idiom they are designing. Victorian or Georgian ceilings are usually about 2,7 metres whilst a 17th century cottage might have a 2.1 metre height. Variety should be enhanced by repeating such differences.

8.43 The desire for better room and garden sizes is welcomed but there appear to be no comments on density or garden sizes. It is noted that some recent homes in Sturry have gardens as short as 1.5 metres (5'0").

8.44-8.45 A double bedroom width of 2.6metres long (8'6") is inadequate as it gives a gap of only 0.5metre (1'8") for circulation. We would suggest a minimum width of 2.75metre(9'0").

8.67 The imposition of these guidelines is thought to be very arbitrary. Visually successful extensions prior to the Planning System, were often in the same plane as the original fronts, with a straight joint honestly showing the history and varying brick dimensions.

8.92 Public art is often an irrelevant afterthought, as with the inappropriately small Whitefriars lamb.

8.100 It is welcome to see attention given to intrusive lighting in commercial sites. The recent Sainsbury's in St Dunstons Street and the cricket ground display unnecessarily intense lighting levels which have not been subject to control

Additional Proposals

8A There is no analysis of how the Planning systems used at CCC can be improved to enable the achievement of the aims set out.

8B An essential part of this would be to include in the DLP an audit of achievement of past projects. It is important to see how the built result has differed from the intentions. Photographic evidence of this is essential as the Canterbury Society has witnessed the same mistakes being made over and over again. It is a great omission that the DLP contains no pictorial evidence of successful design either.

8C The City Council needs to set guidelines for “good Application Drawings” which describe all materials. The manner of window openings should be shown at the initial stage, not drawn later. It has been noticed that window design is often poor even in Conservation Areas. An example is the terrace of houses on the north west side of Wincheap, where top hung windows were used in error, not sash windows. Planning seemed not to spot it in time and no action was taken. The other common issue is casements which do not open, which leads to a non-traditional appearance.

8D Since the days of the Essex Design Guide in the 1970's, local authorities have illustrated aspects of design with sketches. This can be worthwhile if done well, but the DLP makes no attempt to do so. It would be useful to invite designers and builders to “workshop days “ to suggest such sketches and address the issues in 8C above.

8E Enforcement is a weak link in the chain. Far too often work has been carried out which is not in accordance with approved details. Officers and architects have worked to achieve the required result, but on-site it has not been achieved. Then, no enforcement action is taken, thus negating the point of the detailed design work. It seems more important to the Council for the drawings to be correct, than the building. This is wrong: the drawings are purely tools, like a hammer. The problem is exacerbated by the legal search procedure for new property. All that is done is to check if the drawings and documentation are complete. Nobody from The City Council checks the completed building and nobody in the search asks if the building has been completed according to the approved documentation. Often the architect draws the details, gets paid, the client ignores them, buys standard non-approved components and the property is sold.

8F In addition, it has been observed that some work on shop fronts in Conservation Areas and to Listed Buildings has been done without any application at all and yet the City Council has not even asked for a retrospective application. This is a shameful situation and in spite of pressure from the Canterbury Society no resolution has been achieved. This type of performance brings Development Management into disrepute. It is also not satisfactory that Members take no action in these areas.

CHAPTER 9 HISTORIC ENVIRONMENT

General Comments

Broadly speaking, this is an excellent chapter that covers pretty well every aspect of the historic environment, from its exceptional value, to local distinctiveness and the importance of good design, the World Heritage sites, and in particular the importance of the views across the city and the setting of the World Heritage site. This chapter acknowledges the outstanding historic environment of the district and urges that it should be conserved for its own sake. It notes its contribution to the economic viability of the district and its quality of life and its role in delivering sustainability and its “prime importance to residents, visitors and tourists”.

Some of the elements we most strongly support are as follows:

- The need to protect views of the Cathedral and the importance of the views from the valley sides across the city.
- Recognition of the elements of historic character relevant to the setting of the World Heritage site, including roof scape, grain, scale and massing, materials and colours.
- The importance of Listed buildings and Conservation areas and the need to protect them, particularly when carrying out works on highways
- The need for existing and new shop fronts to be uphold the historic character of the city by use of traditional fascias and hanging signs, and discouraging of corporate identities
- The need to protect the general archaeological aspects of the district and in particular the area covered by the designated area of archaeological importance in Canterbury
- The emphasis on conservation and restoration of historic landscape, woodlands, hedgerows and parks and gardens

This chapter could be of immense value, should proposals come forward that the Council wish to resist. All the key policies are there and can be used as ammunition to resist proposals and, more importantly, to fight them effectively at the Appeal stage.

Implementation

In this context, our overriding concern is the risk that the Council will fail to implement what is proposed and will not take the proposed measures into account in the decision-making process.

The implementation of the assessment and protection policies, particularly for historic buildings and development in the urban environment, relies on specialist input by conservation officers or appropriately trained planners. We are not convinced that the small conservation department has the capacity to carry out its work effectively and would recommend that the Council recruit additional officers.

One has to wonder whether the City authorities really have the interest of the historic environment or buildings at heart when considering its policies in allocating Council funds across the range of functions that it is responsible for. Canterbury city in particular is an exceptional place and the historic environment is the engine that drives the whole tourist economy in the city, and is one of the major components of the local economy but perhaps delivers less to the city coffers than it might do, if it were expertly managed and enhanced. A comparison with European cities is

depressing. A visitor to Bruges, Toledo, Carcassonne or Santiago can see how much better these cities manage than we do in the UK. These are of course bigger cities but the resources donated to the conservation of the buildings and the historic areas and to details such as street paving are immeasurably greater and better done than in the UK.

The Council can only do so much within its limited resources, but of course it can lead by example and exhort the private sector to sharpen up its act, look good and offer a quality product. It seems that the current arrangements do not do this at all and organisations such as C4B seem more interested in raw business development than they are in improving and honing the historic environment and the tourist offer.

These are all ideas that could potentially generate money for the city as well as benefit the Historic urban environment. These ideas need working up and the Local Plan should be the place where this happens!

Missing Elements and Additional Proposals

Article 4 Directions There is a discussion of Article 4 areas and this sets out the ground rules for consideration of replacement windows. These do allow replacement of windows by plastic in some circumstances. In the past, the rules have been applied more literally on the Coast, with a more relaxed attitude, whereas in Canterbury there has, in the past, been a more general resistance to plastic windows.

As far as the Local Plan goes, we support what is proposed, but would suggest looking in more detail at the five criteria for replacement windows in paragraph 9.56. We would like to see some toughening up of the criteria to prevent more plastic windows and also to establish a policy for the latest advances in window glazing (Slimlite thin panels and whether these are acceptable for use in Article 4 buildings, or indeed in Listed buildings, or not).

Our one area of disappointment with this chapter is that it is essentially **reactive** rather than **pro-active**. There is a complete absence of Conservation based urban planning ideas, ideas for how the City can be enhanced by development and by well-placed public realm improvements. This could include, for example, consideration of ways to improve the area around the Westgate, for example, by paving the space to discourage traffic and inserting development next to the *Okabasi* to close down that unfortunate void where the space in front of the Westgate leaks off unsatisfactorily along St Peters Place.

Another major opportunity would be to use the Barracks land to make a road connection from the A257 to Military Rd. This would make it possible to remove traffic from Longport and Lower Chantry Lane and to reinstate the urban form of Longport as a long, rectangular market square.

CHAPTER 10 LANDSCAPE AND BIO-DIVERSITY

General Comments

Canterbury District is fortunate in having landscapes and biodiversity that is itself highly variable, e.g. with coastal areas, river valley, extensive woodlands and downlands in the District, and the plan takes cognisance of the need to offer protection and enhancement to them all. We therefore welcome the Council's stated emphasis on countryside and landscape protection, on nature conservation and on the protection and enhancement of biodiversity, and its recognition that "a high quality rural environment contributes to the economic, social and cultural well-being of the district" (paragraph 10.1). There is also a comprehensive acknowledgment that the District already contains a significant amount of very high quality landscape and areas of biodiversity that are worthy of strong protection. Further, we are pleased to see the depth into which this chapter addresses the issues, and we trust that these intentions are successfully met over the coming decades. Our main concerns are that all the existing major housing and industrial allocations are assigned to Greenfield land, much of which is of high agricultural quality; there is an apparent lack of recognition of the conflict between public access to nature and the need to best conserve nature; the fact that none of the rural land around Canterbury has been assigned Green Belt status.

Comments on the Local Plan

a) We take issue with the plans to locate 4,000 houses in SE Canterbury on land that is not only Greenfield and of high agricultural quality, but is also within an AHLV. We believe that policy LB2 is contravened with respect to building on AHLV land, especially when there is other more suitable land for development and when such building will affect the "historic setting of the city and the world heritage site".

b) As it stands Policy LB16 will need further elaboration. Thus if as stated here "The environment within river corridors and river catchments, including the landscape, water environment and wildlife habitats, will be conserved and enhanced", this will almost certainly be in conflict with paragraph 10.74, which encourages increasing public access to river corridors, and to paragraph 11.79 which notes "The riverside strategy aims to create a network of access routes including long distance walks, town centre footpath links, riverside paths and cycle routes from Chartham to Sturry". Thus it is contradictory to suggest that the landscape, water environment and wildlife habitats will be conserved and enhanced while at the same time opening up these corridors to greater public access. The Council must set aside more high value "wild" areas that off-limits to the public or which are strongly restricted with respect to access and activities.

Missing Elements and Additional Proposals

a) While the Draft Local Plan places much emphasis on protection, conservation, habitat enhancement, fragmentation reduction, etc, and while it recognises that there are large tracts of valuable natural environments in the District, we find it difficult to understand why the Council does not declare a "Green Belt" for the city – something that it is entitled to do. We realise that this might not offer 100% protection to rural environments, but it should say to developers that we (the Council) will not even consider development applications made for this land. It is useful to recall here that the Council's Core Strategy (2010) says (paragraph 9.52) "The District's biodiversity will continue to be safeguarded through designation and protection of sites and support for the Kent Biodiversity Action Plan. This Core Strategy, however, would like to go a step further and respond to the biodiversity

opportunities identified in the Landscape character and Biodiversity Assessment by encouraging the protection of land that may contribute to habitat networks in the future and support sensitive land management practices and proactive initiatives for biodiversity improvement.” This is virtually Green Belt creation – please go the rest of the way!

With respect to designating a Green Belt, those areas that could get obvious protection can be readily identified from local mapping, e.g. the Blean Woodlands, much of the AONB to the south of the city, the Hambrook and Stodmarsh marshlands, plus a range of other sites having various nature conservancy designations. But, because of the need to expand corridors of natural environment that join up the larger areas of “wildscape”, it will be essential that other lands were additionally designated. These corridors would be mostly farm grazing lands and perhaps woodland in private ownership. The exact designation of such lands could be carried out in conjunction with the Kent Wildlife Trust, the Environment Agency, the RSPB, etc. The creation of Green Belt will substantially reinforce Policies SP6, LB8, LB9 and OS11.

b) Allied to the lack of designation of Green Belt, the proposed Local Plan fails to recognise the demise of biodiversity that is now in progress both in the District and the much wider world. Thus, although “The Council’s commitment to retention and enhancement of our biodiversity resource is a key element in ensuring a sustainable approach to planning in the District.” (paragraph 10.3), the Plan simply relies on a range of major site designations to effect the necessary biodiversity conservation. While these major sites are of course important, they do little to defend those highly important species that may be more mobile and which lie towards the bottom of trophic chains. Here we are referring to most insects (highly important as food resources for higher level species, and for pollination), including flies, grasshoppers, butterflies, moths, spiders, beetles, moths, etc. Over the last few years their numbers have been variably decimated. This has been caused by a number of factors such as poor farming practices, inappropriate development, urban growth, loss of habitats, climate change, etc. This insect loss in turn has led to the demise of most amphibians, reptiles, small mammals and many species of fish and birds, i.e. because their food sources are dwindling.

To address this escalating loss of biodiversity the Council needs to take actions such as those in Policies LB6, LB7, LB8 and LB9 and explained in paragraphs 10.50 to 10.55. However, further guidance from local and national conservation organisations is needed as to the best course of action to halt this loss of lower trophic level species. We note that some special small-scale wild flower areas are now being designated or planted in the District, but perhaps the biggest single thing the Council should do is to strongly encourage discussions between local farmers (perhaps via the NFU) and relevant organisations (Kent Wildlife Trust, Environment Agency, RSPB, etc) in respect to crop spraying regimes, agricultural runoffs, habitat loss and into making their farm sites more wildlife friendly. Given that the Canterbury area supports a strong farming community, and that lower trophic level species are essential to those of a higher level, we see a policy on reversing lower level wildlife demise as being important.

CHAPTER 11 OPEN SPACE

General Comments

The chapter on Open Space contains a great deal of excellent material about good practice in the provision of open space of different types and about current provision in the district. We would like it to say more about how the recommended standards can be achieved and about what should be provided in the future.

Comments on the Local Plan

Para 11.32 Public and private playing fields

The Plan sets a standard by which all children should have a place to play within 300 metres of their homes and there should be 1.3 hectares of open space for every thousand people. However, there are no maps which would enable us to judge how near the city is to achieving this standard. Canterbury residents know that many recent developments have allowed no space for play at all.

Policy OS1 The Plan should include a specific recommendation about the provision of play places and open spaces, both within existing settlements and in new developments. It should be made clear under (e) what proportion of a development site must be left as open space.

Para 11.37 Sturry Road Community Park

This is described as one of the largest community-led regeneration projects in the UK. It covers 18 hectares and was created largely by the efforts of local people. The existence of the Sturry Community Park enables the local authority to claim that it provides a wide range of leisure provision within the geographical city. In reality there are now many problems with the park, reflecting long-term neglect. The skateboard area is very small by modern standards, the multi-games court is seriously dilapidated, and the whole park is located on the very edge of the city so is not accessible to many local residents. One wonders how long it is since those responsible for the Local Plan actually visited this Park?

Para 11.30 Proposed new football hub

Now that the plan for a Football Hub at Ridlands Farm has been cancelled we hope that space will be found elsewhere for sports facilities. We would support using space at the old Barracks along Littlebourne Road, to redress the lack of sports facilities in the city, and especially in South Canterbury.

Finally we very much welcome the plans to regenerate the Westgate Parks and to set up the Friends of the River Stour in Canterbury. The Canterbury Society will give its whole-hearted support to both these initiatives.

Missing Elements and Additional Proposals

Protection of existing open space

At various points in this chapter reference is made to the lack of open space in Canterbury (para.11.30), to the gradual erosion of open space through development (para. 11.66) and to the protection of open space along the river (paras. 11.45 and 11.83). Kingsmead field is only mentioned (in Chapter 2) as a potential development site; however, this provides a wonderful open space near to many residential areas and adjacent to the Sure Start centre and the swimming pool. It could form part of the green corridor which is planned to run along the river. Chaucer Fields is also a highly valued and much-used local space for residents of north Canterbury.

The Plan should provide a springboard for regeneration of the Sturry Community Park and for better maintenance in the future. More generally, the maintenance of play places and parks in the city should be given greater priority.

Expanding provision for teens/young adults, following consultation with these groups. Canterbury is a hub for large numbers of young people and open spaces should reflect this.

Opening up school and college playing fields, in discussion with educational authorities, especially in Barton and Wincheap wards which are currently short of public open space.

Ensuring the proper maintenance and management of existing parks and playgrounds. This includes the provision of park keepers, which may be shared between parks.

Tackling the under-supply of allotments in the city. We understand that there is currently a waiting list of 2,000 people wanting allotments.

We suggest adding to Policy OS12: Kingsmead Field should be protected and used as a children's playground, an open space for sport, a skateboard park, a semi-natural area and a part of the riverside corridor.

CHAPTER 12 QUALITY OF LIFE

General Comments

This section contains many well-intentioned proposals and places a welcome emphasis on community involvement in decision-making in the planning of provision and facilities.

The chapter mentions the promotion of social inclusion, but does not deal adequately with the quality of life of those who live in poverty or who are excluded from mainstream life. We present some data about the numbers of people involved, and some proposals about what might be done to help them.

Comments on the Local Plan

12.3 'Access to facilities and improving the quality of life' are presented as essential elements in the Plan. It does not seem to refer to access by the public to historically open recreational spaces, one example of which is the Kingsmead development which threatens to privatise a well-used public open space.

12.4 Encouragement of community involvement in the design of new developments is welcomed. However, it is important that such involvement should take place at an early stage, to avoid later pressures and tensions and to integrate the new and old communities.

12.14 This section is concerned with the development of high quality environments. It is hoped that the quality of design of new housing will be of the highest standard, with appropriate use of materials for rural locations

No reference is made to minimum standards for internal or external space or storage. Stable communities depend on people feeling comfortable in their dwellings. We are concerned about developers' tendency to provide increasingly minimal space. It is also important that new developments include sustainable energy saving provision, which should be integral to the design of dwellings, rather than clip on extras.

12.23 The 2004 Transport Strategy is currently being up-dated. Amongst other things, this aims to tackle social exclusion and problems in accessing services and facilities. Withdrawal of the Education Maintenance Allowance (EMA) has resulted in many young people, particularly in rural areas, not being able to afford access to education due to the cost of public transport. In families with several children the withdrawal of EMA has resulted in a local petition being launched to appeal to KCC for consideration. We would support the KCC County wide project Supporting Independence Programme, which is intended to tackle the so-called 'Dependency Culture' which has come from the ending of EMA.

12.26 Highway design is an important part of public space, and insensitive siting of signs and yellow lines reduces the quality of the environment, especially in a City of World Heritage Site quality. A recent example is the unnecessary and ugly yellow hatching in front of West Gate Towers, where the flower containers alone are sufficient to prevent parking

12.38 We support the Plan in urging providers of the District's health facilities to supply a good network of primary health care facilities. The well-being of both individuals and the general community can be greatly influenced by the dual use of such facilities for learning, for the support of young parents, day centres for elderly

people, pre-school nurseries, and so on. In this context the decision to close some children's centres must be deplored.

It is vital that land has been allocated to enable the hospital to expand, to deal with a growing population, a large student body, and the great numbers of visitors to the City.

12.49 Given that St Dunstan's Street has been identified as an area of high air pollution, it is regrettable that new residential accommodation for retired people has been built there.

Good air quality is an important part of health and a sense of well-being and the Council's detailed work on attempting to deal with this problem is noted. The Canterbury Society's Residents' Vision for the City suggested that working groups should be set up involving local residents and businesses to discuss air quality improvement measures and new patterns of travel. This can involve providing more environmentally friendly patterns of transport, including less polluting buses and cars, creating more bus lanes and cycle tracks, encouraging car sharing and bus and cycle use, and concentrating new building along public transport routes.

Missing Elements and Additional Proposals

Any debate about quality of life must take account of those whose quality of life is reduced through poverty or other disadvantage. We are dismayed that the Draft Local Plan makes little mention of this issue.

There are significant inequalities in the length of time that people can expect to live in different parts of the district. So the expectation of life at birth is just over 76 in Northgate ward compared with over 84 in St Stephens and Blean Forest wards and an average of 81 for the district as a whole (Kent and Medway Public Health Observatory, 2012).

Data produced by the local health services show the distribution and extent of deprivation in the district. The highest levels of deprivation in the Canterbury district are found in Northgate and Wincheap wards (Eastern and Coastal Kent Primary Care Trust, 2012). Such deprivation typically reflects low income, even though people are in full time paid work.

Canterbury has a relatively high proportion of children living in poverty, compared with the rest of Kent. So in 2012 there were estimated to be 5551 children living in poverty, or 20 per cent of all children in the district. In Kent only Thanet has a higher proportion of children in poverty. This is particularly an issue in Northgate ward, where 40 per cent of children live in poverty, and in Wincheap. These figures use government measures in which poverty is defined as living below 60 per cent of median income.

Poverty damages children's experience of childhood and harms their future life chances. Children living in poverty are more likely to go without much needed clothes and shoes and to miss out on school trips and holidays; they tend to achieve less well at school (End Child Poverty, 2013). As a community we cannot afford to waste the potential of our children.

What can be done about child poverty? Local authorities now have more discretion to add to social security benefits, so the options include:

- Protecting families with children in decisions about benefits, and making payments for essential items, council tax and support with housing costs
- Ensuring that child poverty is a priority for Health and Well-being Boards, so as to give every child the best possible start in life
- More generally, it is important to check that people are receiving the benefits to which they are entitled, for example, by running a Benefits Awareness Campaign. This can also bring significant additional income to the local area (Turn2us, 2013)

For many Canterbury people their quality of life is constrained by housing problems. Government statistics provide information about the extent of housing stress. The numbers of households on the local authority waiting list has increased dramatically since 2011. While the housing waiting list remained around 3500 from 2008 to 2011, in 2012 it soared to 4588. This is the largest waiting list in Kent, with the exception of Thanet (Data.Gov.UK, 2012).

The number of households accepted as homeless across East Kent peaked in 2003-2004 at 925. In the following four years this figure reduced to 332. The two most common causes of homelessness were eviction by a family member or friend and also loss of rented or tied accommodation. Loss of accommodation due to relationship breakdown has also risen proportionally (Canterbury City Council, 2008).

What can be done about housing shortage and homelessness? It is crucial that new developments include as much affordable housing as possible. Too often planning permission is given for a development on the understanding that many of the houses will be affordable, only for the developers to wriggle out of their commitments. Current benefit cuts are creating problems for those who find themselves in houses judged to have too many bedrooms for their needs. Increasing evidence is revealing the problems which this is creating. Some local authorities are not implementing the bedroom tax and Canterbury City Council is working to reduce the impact of the scheme. However, a longer term solution to housing problems and homelessness depends on building more housing which local people can afford.

It is important that the Local Plan reflects the situation of all the residents of Canterbury district and not just the concerns of the more vocal and privileged.

APPENDIX 1

DETAILED COMMENTS ON CHAPTER 2 ON HOUSING

1. Fundamental Principles

Canterbury is a small historic cathedral city and its historic, architectural and cultural heritage is its principle economic assets. It is heavily constrained by the high quality of its setting and the surrounding countryside and is a World Heritage Site. Because of this all proposed development should first protect and enhance these advantages, which have great economic value, whilst at the same time providing for the economic well being and employment opportunities for its residents in a way that is sustainable and proportionate in scale. We regard this as the first fundamental principle against which all other policies should be reconciled. No development whether due to its use, scale or location should be permitted which could compromise this fundamental principle. Many would argue that Canterbury has already passed a point of reasonable sustainability as is evident in the continual traffic pressures that the city now experiences at almost any time of the day. If the deteriorating quality of the city is to be halted it is essential that every effort be made to take the heat out of development as much as possible by concentrating most future growth away from the contiguous growth areas.

A second fundamental principle upon which we would base a housing strategy is that the large majority of housing should be located with easy walking distance of public transport. Most urban centers that have reduced the impact of road traffic have done so on the basis of greatly improved bus, tram or rail use. Greater use of public transport becomes a reinforcing dynamic, i.e. more use equals both the potential to reduce fares and to increase the frequency of services. It can also speed transport up as cars are taken off the roads. This means that any housing strategy we recommend will wish to site new house building along the two rail routes radiating from the West and East stations, and along the bus routes that service the Whitstable, Herne Bay, Thanet, Dover, Ashford and Faversham directions. A perusal of the Council's SHLAA housing list provides evidence that there is sufficient land within walking distance of these routes to service housing needs for at least 10 years.

2. Economic Growth

The emerging Local Plan has clearly set economic growth as the principle driving force behind the provision for housing but this needs to be reconciled with our Fundamental Principles. The recent financial crisis in the banking sector has clearly slowed down economic activity in the area, though it is accepted that Canterbury has not suffered as badly as other parts of East Kent. **However, there appears to be an unexamined belief that a larger housing provision than might otherwise be necessary could somehow kick start an economic recovery in the area.** We consider that in the face of the global economic forces currently at work this is a deluded assumption and until these macro economic factors are resolved simply allocating thousands of additional houses on the outskirts of this small historic city will only add to the problems that the city already has. In fact the very reasons why people might want to live and work in Canterbury will be compromised.

3. The New Homes Bonus

An important consideration which has now entered into the Council's considerations is to do with local authority finances. This has been acknowledged by Canterbury City Council (CCC) but is not specifically referred to in any of the reports available. The recent drastic cutback in government grant to local authorities has been replaced with the New Homes Bonus by which central government match fund the rateable income from every new home built for a period of 6 years from the date of completion. As a result local authorities are being driven to bridge the gap in their finances by allocating more houses than they might otherwise have felt the need to do. This is an invidious position for them to be in. They are faced with having to cut back on jobs and essential services and build more houses than those services can in any event support. Growth based on this sort of reasoning is unsustainable and is only storing up financial problems for the future.

This is analogous to trying to put out a fire by pouring petrol on it.

The Council no doubt thinks it is trying to steer a safe course through these difficult issues but what is needed is a far more enlightened approach, and one which achieves a better balance between economic wellbeing, adverse environmental impacts and quality of life issues. The true test will be whether the quality of life for residents will be better or worse in 2030 than it is now by pursuing the very large building programme at the Upper End of the Nathaniel Litchfield options. We would urge the Council to exercise considerable caution before going down this route. We note further that not all Council's in Kent are pursuing the building of large numbers of houses in the belief that it will improve their local economy. Sevenoaks, for example, only intends to build a net average of 165 homes per year for the whole period until 2026.

4. Recent Local Housing Surveys

The recent **Ipsos Mori Report** commissioned by CCC drew attention to the concerns of local residents at the scale of the proposed housing options being proposed and the clear message that whilst 58% backed building in principle, support falls away when residents are presented with details and then 48% backed options which involve the same or fewer homes per year than at present.

In the summary of poll findings, some of the key headings read:

"Majority support building in principle but most favour same or slower pace"

"There is a strong conditional nature to public opinion"

Specifically, where participants are asked "What if it meant building on Greenfield sites," approval fell by a full 40%, turning a small majority in favour to a large majority against and "Seven in ten (70%) residents say they would oppose further development if greenfield sites were used" (Mori p23). One of the Ipsos Mori conclusions is: "The survey found very strong satisfaction with the local area and 40% of residents identified the countryside and the natural environment as something important in making somewhere a good place to live, third only to safety and health services among a list of thirteen."

We therefore challenge the conclusions that the Council have drawn from the Ipsos Mori Report. We believe they have "cherry picked" those parts that suit

their preferences and have ignored those parts which do not. It is simply not legitimate for them to claim public support for the housing numbers in the Draft Plan. On the basis of the Ipsos Mori data one could make a more robust case for a lower rate of development and still achieve sustainable growth and the economic benefits that the council is seeking.

The Nathaniel Litchfield Report (NLP) (January 2012) sets out 10 scenarios for the number of new homes that might be built per annum and seeks to align these with the pledges in the Corporate Plan 2011-13. However some “inconvenient” Corporate Plan Pledges have been ignored i.e. Pledge 3 (houses in the right places) Pledge 4 (traffic congestion) Pledge 7 (support cultural facilities, whereas Pledge 8 merits two of the six scoring categories. It is assumed, a priori, that Corporate Plan Pledge 8 (“We will plan for the right type and number of homes in the right place to create sustainable communities in the future”) can only be achieved at the upper end of these options, whilst those options at the middle and lower ends will fail to meet the objectives of the pledge. The problem is that “the right type and number of homes” has not been properly tested against the constraints of the Fundamental Principles with which we started, but rather against ambitious assumptions in terms of economic growth, demographic projections and the need for more affordable housing. We would favor a managed Policy and Supply led approach which would lead us more towards Scenarios a B and C.

5. Level of Housing Provision in relation to Economic Growth (Policy HD1)

According to the NLP Report the number of jobs in the Canterbury District is 72,427. Between 2011 and 2026, employment in Canterbury is forecast to grow by 4.7% (para3.41). This means that employment growth for the full 20 year period of the plan would be about 6.25% which equates to about 4,526 new jobs. This figure is corroborated in Figure 3.15 and by calculations based on an extension of the trend line in Figure 4.3. If the NLP figures are correct then provision of 15,600 homes would be at the ratio of over 3 homes for every new job which is plainly ludicrous.

Based on data from the 2011 ONS census there were 63,859 dwellings in the Canterbury District housing 71,322 economically active people giving a ratio of 1.16 workers per dwelling. The provision of 15,600 dwellings would require employment growth of 9.44% over the plan period. A perusal of Figure 4.3 of the NLP report shows that this is completely at odds with any realistic forecast.

If the balance were to be weighted in favor of economic growth we would argue that growth will only be *sustainable* within the constraints imposed by our Fundamental Principles. On this basis we note in the Nathaniel Litchfield Report that during the period 1998 - 2010, which included the period of greatest economic growth since World War 2, employment in the district increased to an average of 574 new jobs per annum. Of these 26% of the jobs are taken by people living outside the District. It would therefore be ambitious to start from a position of trying to get employment back to the levels before the current recession by adopting the 574 figure going forward. On the assumption that each job should be matched with a suitable house one would have a starting point of 574 houses per annum from which one could deduct 26% for the people who would be working in Canterbury but preferred to live elsewhere. This would give a requirement for around 425 dwellings per annum and we would be in favour of a starting point for an annual provision closer to this figure rather than at the upper end of the various Nathaniel Litchfield scenarios. Certainly any scenario whereby more than 600 homes were built (as in the Lower Middle Nathaniel Litchfield suggestions) will ensure that Canterbury becomes ever more heated, local authority services will be stretched even further and the quality of life for residents will deteriorate.

Within the framework of our Fundamental Principles the numbers we suggest, which are derived from and closely linked to the historically high employment figures, would satisfy Pledges 1, 6, and 8 of the Corporate Plan without the potentially adverse affects of the Upper Middle and Upper End options trailed by Nathaniel Litchfield.

We also observe that in considering the number of new dwellings required to service the economic growth the plan predicates, no account is taken of the large number of existing houses that are for sale or are empty in the area at any time throughout the plan period. We believe this is an important factor that the Nathaniel Litchfield Report has overlooked and that further investigation needs to be done to establish the impact this would have on the number of new houses required. Using statistical information obtained for Canterbury in 2011 from <http://emptyhomes.com/statistics-2/>, it is noted that there were 1955 empty homes in the District. Although many of these might overlap with houses that are for sale, it does indicate that a reservoir of existing available houses is currently available, and under the Housing Act (2004) the Council has discretionary powers to take over many of these properties.

6. Level of Housing provision in relation to past rates of completions

We attach a schedule of housing completions for the period 1991/2 to 2011/12 from the Canterbury City Council Monitoring Report.

It can be clearly seen from this that the average rate of completions over this 21 year period was 545 units per annum and that this included two large “spikes” in the numbers in 2007/8 and 2008/9 which coincided with the banks’ unprecedented and unsustainable lending boom, resulted in huge increases in mortgage lending and house prices that eventually triggered the current economic difficulties. If the figures are adjusted for this spike by substituting the average for the remaining 19 years this produces a figure of 484 units for the 21 year period.

These figures, together with those based on the employment figures in section 4 above; show how completions fluctuate over a period of time similar the one in the emerging Local Plan. Any impartial observer would be drawn to the view that the 550 provision advocated by the Canterbury Society Vision document would be about right based on the historic evidence. Not to do so would require a lot of special pleading to overcome the evidence above. By adopting a provision of 550 units per annum over the plan period a better balance would be struck between the economic, social and environmental impacts of the plan, the 4000 house proposed allocation to the South of Canterbury would be unnecessary, and the Councils Corporate Plan aspirations with regards to the local economy could still be delivered.

7. Brownfield Sites

Another important issue is that it has been national policy for many years, confirmed again in the recent National Planning Policy Framework (NPPF), that wherever possible preference should be given to previously developed “Brownfield” sites before resorting to the development of green fields and agricultural land. We are concerned that this essential principle has been disregarded in the emerging Local Plan even though in formulating the Council’s October 2011 response to the Draft NPPF consultation Council officials expressed concern that:

“Notably the Draft NPPF omits the existing policy that 60% of homes should be built on previously developed land.....the principle of developing Brownfield land in

preference to Greenfield land where possible is important to ensure an efficient use of land.”

Unless this omission is remedied in the emerging Local Plan there is a real danger that the plan may be declared contrary to the NPPF in this respect and sent back for further consideration.

8. Hersden

The former colliery site at Hersden contains the largest Brownfield site in the Canterbury District capable of accommodating around 400 dwellings. Council officials have set their face against development of this site for reasons that are incomprehensible to us.

This has caused us to investigate the planning history of the site and we have established that in April 1989 a senior planning inspector appointed by the Secretary of State for The Environment granted outline planning permission for residential and industrial development including some 600 dwellings. (APP/J2210/A/88/11040).

This decision was subsequently overturned by the Secretary of State but only on the ground that to go ahead at that time would have been premature pending the emerging Local Plan. One could hardly argue that 24 years later the same reason could apply given the Council's desire for growth, and its response to the Draft NPPF consultation outlined in 7 above.

Significantly the industrial development on the Greenfield land that formed part of the Appeal in 1989 was subsequently allowed to proceed and given planning permission by Canterbury City Council (Lakeside) and therefore some 50% of the original scheme has now been developed. It seems to us unreasonable, even illogical, that the Council should continue to refuse to give higher priority to the merits of this Brownfield site having allowed industrial development to proceed on adjacent Greenfield land in what was open countryside.

Interestingly the Inspector who granted permission for residential development on the former colliery site in 1989, Mr. Charles Hoyle, was also the Inspector who presided over the CCC 2006 Local Plan at the Local Plan Enquiry in 2004. One of the issues he considered at the 2004 Inquiry was whether or not the former colliery site was still a “Brownfield” site. He considered the Council's views on this and carried out a detailed inspection of the site. He concluded as follows: ***“I can only conclude that the land, though looking quite green from a distance is still only subjectively describable as previously developed land, and likely to remain as such for many years to come. It has definitely not blended into the surrounding rural landscape. Only expensive major restoration work, entailing the import of very large amounts of topsoil, could change this situation to a marked degree”***

An aerial photograph taken as recently as February 2011 clearly demonstrates that there is no reason to question Mr. Hoyle's conclusions. It is inconceivable to us in the light of Mr. Hoyle's findings that the Council could still claim that this is not a Brownfield site, especially since PPG3, on which the Council sought to rely, has been withdrawn and superseded by the National Planning Policy Framework which states quite clearly that wherever possible preference should be given to Brownfield sites. We understand that the Kent Wildlife Trust has received written assurances from the landowners consultants with regards to the non- statutory designation as a site of Local Nature Conservation Interest and that prior to development taking place discussions will be held to agree suitable measures to protect and wherever possible

enhance any biodiversity value to the Trust's satisfaction. We understand that this designation has in any event been withdrawn in the NPPF. We further understand that the objection from Natural England relating to cat predation is conditional and can be resolved.

The Highway Authority raised no highway or transport objections to the allocation of the site in 1989 and in 2004 and we have also established that Network Rail now have proposals, which are already funded and programmed for 2014-2018, to carry out improvements to the level crossing at Sturry which will reduce both congestion and pollution and any significant delays to traffic. Hersden additionally offers the potential for a renewed railway station if future circumstances prove viable.

We consider that the time has now come seriously to investigate the Hersden option in a way the Council have not done before and to identify Hersden, including the former colliery site, as a location for a planned village regeneration scheme of between 1000 and 1200 dwellings. We suggest a comprehensive Master Plan be prepared to include land to the north and south of the A28 with a view developing a critical mass that will secure the funding to carry out the considerable improvements to a larger Hersden that could be secured by development at this scale. We understand that two surveys of the village have been carried out and both found that residents were in favour of future residential growth. Growth at Hersden could be sufficient that a distinct self-sustaining community could be developed, something that would be virtually impossible to achieve with additional housing around the edge of Canterbury.

It was clear from the information made available at the stakeholder consultation on 18th June 2012 that the general public is very supportive of the idea of expanding the larger villages. We note also that Hersden was recently moved from 33rd to 4th place as a Local Centre in the Rural Settlement Hierarchy Study commissioned by CCC. This mirrors the findings in Savill's May 2008 Employment Land Assessment Report again commissioned by CCC which concluded that Hersden was a highly sustainable location for development to take place.

We have argued strongly the case for Hersden as a location for development because this would have the considerable advantage of taking some of the pressure of numbers off the deeply unpopular option to the South of the Canterbury City Centre. This would enable a more even distribution of the housing allocations across the district, whilst still keeping open the possibility of development at Thanington if this was considered necessary in the future. We noted at our meeting on 30th May the comment that Hersden would feature in two of the three options the Council were considering and we very much hope that this option will be taken forward into the emerging Local Plan.

9. Duty to Co-operate (Par. 1.28)

We would refer you to the NPPF paragraphs 178- 181 (*Planning strategically across local boundaries*) in which it states that ***“Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas- for instance, because of lack of physical capacity or because to do so would cause significant harm to the principles and policies.”***

Whilst the Local Plan May 2103 refers to a number of high level discussion forums of which the Council is aware, there is no evidence that it has consulted with other neighbouring authorities specifically on housing numbers and locations. Reference is

made to regional strategies but the council must know that these have been abolished and replaced with the Duty to Co-operate. Clearly this has not taken place in any meaningful way which is a fatal weakness in the plan and calls into question the housing numbers and distribution presently proposed.

Figure 7.2 of NLP shows that surrounding districts in East Kent are planning to build 2975 houses per annum for 20 years. This equates to 59500 more homes, which at an average of 2.4 people per household equates to 142,800 more people. If we add this to the Canterbury proposal for 15,600 more homes at a ratio of 2.4 people per dwelling we arrive at a total of 180,240 more people. This is the equivalent of four more cities the size of Canterbury and when seen in this light the numbers begin to look completely unrealistic.

This is important because Canterbury is severely constrained by its historic character and setting and there is a limit to which it can expand without severely compromising these valuable qualities. It can be argued that the four adjoining authorities Ashford, Dover, Thanet and Swale are not constrained in quite the same way and each of these authorities has large housing allocations which have not yet been developed. It is essential therefore that proper cross boundary strategic planning is undertaken before decisions on final numbers for Canterbury are made. At the moment we have seen no evidence that such strategic cooperation has taken place, which could have the effect of reducing the pressure of numbers on the Canterbury District.

10. The National Planning Policy Framework (NPPF)

The National Planning Policy Framework provides that when making decisions about which sites should be included in the Local Plan for development local authorities should do so on the following basis:

- (a) Preference should be given to previously developed Brownfield sites.
- (b) The best agricultural land should be safeguarded.
- (c) The viability of any proposed allocation should be verified before it is allowed to go ahead.
- (d) The Council should ensure that the necessary infrastructure can be provided by the statutory bodies and that it will be done so contemporaneously with each phase of the development.
- (e) When prioritizing options the Council should ensure that a sufficient payment by way of the new Community Infrastructure levy (CIL) will ensure that the necessary social and community infrastructure is provided as the development proceeds and that a significant amount of this is spent on improving facilities for existing communities.
- (f) Sustainability is a vitally important issue when deciding on the preferred locations for future housing. The NPPF also has an important section on Achieving Sustainable Development. In paragraphs 6-10 it identifies three dimensions to sustainable development- economic, social and environmental. It goes on to say that ***“these roles should not be undertaken in isolation, because they are mutually dependant”***. Paragraph 10 emphasizes that ***“plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.”***

We understand that the Council has not yet completed the work on sustainability which will be needed to support their decisions on housing allocations. We are concerned about this because it leaves the Council open to the criticism that they have made their decisions first and will then retrofit sustainability to the decisions they have already made. This would lead to poor outcomes and may cause the plan to be considered unsound when subject to an EIP. We would urge CCC to ensure that any

proposed allocations are subject to sustainability testing before any final decisions were made and that this work is made public.

Strategic Housing Numbers and Locations

We wish to register the fact that we and many local residents groups are deeply concerned about the Council's preference to allocate some 4000+ houses in the area between the south of the City and the nearby village of Bridge. In our view this would be the worst possible option when measured against our Fundamental Principles. The 2006 Canterbury Local Plan Para.3.76 states "If for whatever reason the development envisaged at Little Barton farm does not take place within a reasonable time period, the site will not be regarded as suitable for other forms of development and will be returned to agricultural use" This refers to a site amounting to around 20 hectares of land in the area in which the Council are now proposing that 4000 houses should be allocated.

We would prefer to see a reduction in the rate of provision from 780 units per annum to around 550 and a more dispersed pattern including Hersden and possibly Thannington which are both on existing principle transport corridors (A28). By adopting a strategic requirement of 550 units per annum for the period of the plan the total number of units required would be reduced from 15,600 to 11,000, a saving of 4600 units which would allow the controversial proposal for 4000 units on High Grade agricultural land in South Canterbury to be removed from the plan.

Over the page we suggest that, based on the Council's SHLAA survey, there is capacity during the period of the Plan for new allocations in the following locations:

PROPOSALS FOR NEW DEVELOPMENT

Hersden

Former Colliery Site	400
Land North of Hersden	800
Spires Academy	131

Herne Bay

Strode Farm	800
Greenhill	600
HB Golf Club	400
Bullockstone Road	190
Hillborough	1000

Canterbury

Simon Langton Girls	270
St Martin's Hospital	200
Barham Court Farm	25

Rural Sites

Sturry/ Broadoak	1000
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Whitstable

North of Thanet Way	400
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Total New Allocations 6216

To the above must be added the existing allocations and planning permissions included in Par 2.26 of the Draft Local Plan as follows:

Oversupply 2006/11	1003
Existing allocations	997
Existing consents	1226
Small sites	2204

Total Existing Allocations 5430

Summary

New Allocations	6216
Existing Allocations	5430
Total	11646

Average over Plan period 582

We appreciate that this is slightly above our recommended figure of 550 per annum but we have allowed some slack (some 640 units over the plan period) to allow for the inevitable slippage that will occur in sites coming forward for development.

In addition it should be borne in mind that Canterbury will deliver some 2000 units of student accommodation over the plan period, at Parham Road, UKC Campus and Rhodaus Place, which are not included in the Council's figures and have therefore been excluded from our own calculations.

11. Affordable Housing (Policies HD2, HD3)

The Nathaniel Litchfield Report identifies the problem of Affordable Housing. It points out that the Council's Strategic Housing Market Assessment 2009 (SHMA) estimate that 77% of newly forming households in the District are unable to afford to buy or rent market housing. The SHMA 2009 estimated the need for Social Housing in the District at 1,104 dwellings per annum compared to the average 122 Social houses per annum provided since 1990. This represented an average of 22% off all new homes built in the period. If this percentage was almost doubled to say 40% it would still leave a substantial shortfall. In The opinion of Nathaniel Litchfield *"a step change in supply of new affordable homes would be needed to meet the need in the District for such accommodation"*

The issue of affordable housing is now a very difficult problem nationally and the emerging Local Plan offers no solutions to this problem. We feel that something exceptional needs to be done about this. It may be for example that a number of "exception sites" need to be identified and safeguarded, spread across the district, specifically for affordable housing, where the land would only be given planning permission if the site could be purchased at a price that enabled affordable housing to be provided. Suitable policy wording would need to be devised to ensure that such sites could not be transferred to open market development. Clearly the Council's idea of building 100 private houses to obtain 30 Affordable Homes is never going to solve the problem even if this was a viable option for the developers in the first place. Recent experience has indicated that is not.

12. Student Housing and Houses in Multiple Occupation (Policies HD6 and HD7)

The exceptionally large number of students in Canterbury has a significant adverse impact on the housing market in the District. It creates a constant demand for rented accommodation in the City, which keeps rental values artificially high and out of reach of many local residents. It also increases the number of Houses in Multiple Occupation (HMOs) and depletes the stock of family accommodation available to local families.

Student accommodation can also upset the balance of neighbourhoods when too high a percentage of houses are occupied by students who often have different lifestyles from ordinary residents.

We feel that the City universities should be required and encouraged to provide sufficient housing for their students, preferably on campus and in locations that are suitable in planning and environmental terms. This would free up large numbers of houses for local people to occupy. In this connection we would recommend that the universities be required to submit their projections for student numbers and their proposals for student accommodation together with a land use Masterplan which can be rolled forward contemporaneously with the Local Plan so that this element of housing provision in the City can be much better managed going forward. This would not be too much to expect from the universities who in any event must produce and constantly update their own business plans to take into account a whole range of issues. It is no longer acceptable for them to think that these problems can be outsourced and be left to the local community to resolve the best way it can.

We also recommend that The Council consult and adopt a Policy in the Local Plan, similar to Policy CS25 (Student Accommodation) in the Oxford City Council Core Strategy 2026 as follows:

*“Planning permission will only be granted for additional academic/administrative accommodation for the University of Oxford and for Oxford Brookes University where the university can demonstrate in the first place that the number of full time students at that university, who live in Oxford but outside of university provided accommodation, will before the particular development is completed be below the 3,000 level and once that figure is reached, thereafter will not exceed that level. All future increases in student numbers at the two universities as a result of increases in academic/ administrative floor space must be matched by a corresponding increase in purpose built student accommodation.
Student accommodation will be restricted in occupation to students in full time education on courses of an academic year or more.
Appropriate management controls will be secured, including an undertaking that students do not bring cars into Oxford”*

Clearly Oxford City Council has experienced similar problems to Canterbury with regard to the impacts of a very large student population and we would recommend that Canterbury City Council look at the Oxford experience and learn from it.

13. Sustainability

It is vitally important that all future development across the district complies with the principle of sustainability at least as defined in the NPPF. This means that the Council has to pro actively apply these principles themselves and ensure that developers do the same and not devolve this responsibility to “market forces.”

This implies that Brownfield sites will be given priority, that the necessary infrastructure (i.e. Gas, Water, Electricity and roads) are available at each phase, that the latest codes for sustainable construction are used, that good design of buildings and neighborhoods is achieved through the Masterplanning process and that the necessary support for local communities both new and existing is available to enable these neighborhoods to become thriving communities with a strong sense of place.

14. Conclusions

Our principal concerns are centered on the scale of housing numbers that the Council have extracted from the Nathaniel Litchfield scenarios and some of the locations that are proposed particularly to the south between the City and the village of Bridge, which we believe is the worst possible option and will seriously affect the setting of the City.

We are of the view that “forcing expansion” will not bring the economic and employment benefits that are claimed, and that in the light of the historic character of the city a more sustainable approach to growth is required, which is not so much focused on numbers but more on outcomes for local communities both new and existing..

In the Core Strategy 2009 page 27 paragraph 4.3 the Council considers the impact of the recession and states “*Current analysis suggests that the UK economy is likely to emerge from recession in 2010.....*” This has clearly proved to be far too optimistic a view on which to base a plan for a large expansion of the city at the higher end of the range of options for housing provision which the Council are currently considering. The present downturn started in 2008 and the financial and economic situation in UK and Europe generally has continued to decline to the point where is now accepted

that we have entered a period of economic stagnation which is likely to continue for at least another 5 or possibly even 10 years. We take the view therefore that the Upper End Options are totally inappropriate. They are out of step with the realities of the economic situation and if implemented will cause irreparable damage to the character and setting of the City of Canterbury.

We are of the opinion that provision in the order of circa 550-580 houses per annum over the plan period is the right level to satisfy the realistic economic aspirations of the District. This falls within the mid range of the Nathaniel Litchfield options whilst still maintaining the quality of life that residents wish to retain. We set out in 10 above our views on dispersal of these numbers across the District having considered the Council's own SHLAA options. For the reasons set out in this paper we regard the Upper-Mid and Upper End scenarios in the NLP report as unnecessary and unsustainable on a broad range of measures. **This leads to the clear conclusion that the provision of 4000 units in South Canterbury is completely unnecessary.**

The advantage of this less "bullish" approach to housing provision is that it is more sustainable and still leaves open options to increase the numbers on future reviews of the Local Plan if this were shown to be necessary and provided the public were persuaded it was desirable to do so.

In our view the Strategic Housing Requirement (2.17 to 2.31) of the Canterbury Local Plan May 2013 is flawed because it is based on assumptions about economic growth that are unrealistic and unsustainable in the light of all the current national economic indicators and because it fails to achieve a sustainable balance between economic, environmental and social impacts as recommended in the NPPF.

APPENDIX 2 THE VISUM TRAFFIC/TRANSPORT MODELLING

A careful perusal of the Jacobs Report indicates that the validity of the VISUM traffic modelling as described must be seriously questioned.

The main problem with the report is that the conclusion is not supported by the evidence that the modelling revealed. In the Summary of Options (p.30), the report details the “unique set of characteristics” pertaining to each of the three Options that they modelled. The conclusions on each Option can be summarised as follows:

- For Option 1 Jacobs lists 1 neutral and 5 positive points.
- For Option 2 Jacobs lists 1 neutral and 5 negative points.
- For Option 3 Jacobs lists 1 neutral and 4 negative points.

From this summary it can clearly be seen that Jacobs recommended that Option 1 performs best in terms of transport modelling and recommends (page 31) that this model is the best in terms of major Canterbury development locations and their impacts on transport.

However, a more detailed and objective summary of the actual Jacobs finding are provided in the table below. To compile this table all objective statistical data of relevance was extracted from the various maps and tables in the Jacobs report and a simple ranking system was used according to whether the data recorded was Best (scored 3), Medium (scored 2), or Worst (scored 1) (in terms of their impacts on travel). These scores were aggregated such that it can be seen that objectively Option 1 comes out as the worst choice, and not the best choice as suggested by Jacobs. A perusal of the individual model measurements included in this Table, i.e. to see if some might be more important than others, only serves to widen the gap between Option 1 and the others.

Model measurement being made	Option								
	1			2			3		
Increase in travel demand (am) (Table 4-a) ¹	50100	W	1	49900	M	2	49900	M	2
Increase in travel demand (pm) (Table 4-a) ¹	49700	W	1	49400	B	3	49500	M	2
Mode of transport (car) (Table 5-a) ²	84.2%	W	1	83.0%	B	3	83.8%	M	2
Mode of transport (bus)(Table 5-a) ²	11.0%	W	1	12.7%	B	3	11.7%	M	2
Mode of transport (rail)(Table 5-a) ²	4.8%	B	3	4.3%	W	1	4.5%	M	2
Park & Ride use (am)(Table 5-b) ³	4.1%	B	3	4.0%	M	2	4.0%	M	2
Park & Ride use (pm)(Table 5-b) ³	2.4%	M	2	2.4%	M	2	2.6%	B	3
Peak road traffic speed reached (mph)(Table 6-a) ⁴	19.7	B	3	19.5	M	2	19.5	M	2
Additional vehicle kilometres driven (Table 6-a) ⁴	20055	W	1	18470	B	3	18660	M	2
Total congestion time created (mins) (Table 6-a) ⁴	31395	W	1	30644	M	2	30237	B	3
Inner cordon crossed (am)(Table 6-b) ⁵	16900	B	3	17000	M	2	17200	W	1
Inner cordon crossed (pm)(Table 6-b) ⁵	16300	M	2	16400	W	1	16200	B	3
Mean time delay at junctions (Figures 6-e, f and g) ⁶	1.87	B	3	2.07	W	1	1.96	M	2
Total score			25			27			28

- ¹ Person trips. Not all the travel demand tabular data were used because other Tables produced relied on these same data.
- ² Person trips. Assumes that increased use of car is undesirable, but increases in bus or train are preferred.
- ³ Person trips. Assumes that largest proportion of traffic diverted to Park & Ride is good.
- ⁴ Assumes that faster speeds, shorter extra driving distance and less congestion time are preferred.
- ⁵ Assumes that least amount of traffic moving through inner traffic cordon is preferable. Data on outer cordon crossed has not been included because this could have both negative and positive effects.
- ⁶ Minutes. Data based on a calculation of the mean delays at all road junctions shown on each map.

Other objections to VISUM findings

- There is no information as to the basis of the 221 modelling sectors, or how the data was actually obtained on which the modelling was based. Little information on a host of other factors relating to the methods used, e.g. sampling strategies, size of roads included, number of site visits, time of year, how saturated traffic flows were recorded, the base model parameters, etc.
- Not all sites have been modelled, as the report claims
- Modelling takes no account of walking and cycling or introducing strong traffic sustainability measures. For instance the 20% cycling level now reached in London is having a major effect on transport modelling. It is hoped that cycling rates in Canterbury will be considerably higher by 2026. And other futuristic projections cannot be predicted, e.g. how many cars will be on the estate of 4,000 houses, or the locations where 1,000s of windfall houses will be built
- There is no mention of likely passenger numbers using rail stations.
- Both inputs and outputs to the model are similar for each option – this makes the establishing of any priority almost impossible to achieve.
- Modelling covers a 15-year time period which is too long to give meaningful results. Also, results indicate just three snapshots in an assumed 2026 situation. The report does not say when the various roads, road interchanges or bus services will commence.
- Because the modelling work was undertaken in 2012, many developments have not been included, e.g. lots of community facilities, a new Herne Bay High School, 800 houses at Hersden, 400 houses in Whitstable and 1000 in Sturry/Broad Oak, the proposed development of many business sites, no inclusion of the proposed Sturry by-pass, the road through the Howe Barracks, the closure of Broad Oak Road, and the possibility of an A28 road tunnel under the railway embankment. If these major developments have not been included there is no possibility that the Jacobs results will be in any way reliable (see point 5 below). And Jacobs assumed 2,500 houses in Thanington, whereas the present draft Local Plan shows no houses here.
- The development scenario assumes that virtually all retail development will only occur at Wincheap, i.e. 85% (Figure 3 – c). But there is little evidence that any additional retailing might be needed.
- There is no inclusion of the fact that, under this Local Plan, large numbers of Canterbury residents are likely to have to commute to London. The need for additional railway parking at Canterbury West implies a large rise in journeys across the city.
- There is no mention of the fact that large aggregations of development within specific areas are certain to have adverse effects on traffic in these areas.