

# The Canterbury Society

## RESPONSE TO THE CONSULTATION ON THE LOCAL DEVELOPMENT FRAMEWORK (LDF) – CORE STRATEGY

12<sup>th</sup> March 2010.

The Canterbury Society has a number of comments on the LDF document and where possible these are directed towards either paragraphs in the draft document or to consultation questions. It has not always proven possible to match all comments as some of them are concerned with the LDF process itself, whilst others are concerned with thematic areas that cross thematic boundaries within the strategy.

The Society recognises that a tremendous amount of work has gone into this document and that the Council are having to work within constraints imposed by the complexity of the present planning system requirements, as well as the need to make provision for far more of a built environment than is desirable in and around a city such as Canterbury. However, we do feel that there are areas where the proposals contained in the LDF are not in the best interests of the District, and certainly not in the best interests of Canterbury as an historic city, one that contains a world heritage site and is consequently a major UK tourist destination.

An additional preliminary matter of concern is the 'near insistence' that responses to this consultation should be carried out by any of a number of electronically-based means. Whilst we appreciate that this is convenient for the Council, it is certainly not for a wide section of the community. We feel that this will have discriminated against sections of the community, and this is certainly undesirable going directly against Canterbury City Council's remits under their "Statement of Community Involvement".

### **Paragraphs 1.10 and 1.11 (Research and Evidence base)**

We welcome the fact that a wide evidence base is being used to inform the LDF but we notice that there is further evidence that will inform the later stages of the LDF. We are concerned that much of the missing material is vital if the public (and indeed the Council's officers) are to make informed inputs into the formulation of this current document. We note that, at the January 7<sup>th</sup> meeting of the Council's Executive Committee (in an Appendix 2) the Head of Regeneration stated that "all the background documents will be made available during the consultation period." This is clearly not the case and by the 'Preferred Options' stage it might be too late for the public to be involved in making major revisions.

We wish to know (a) when the requisite materials will all be available, (b) when the public will have a further consultation on any missing materials, and (c) what will be the scope of any further public consultation? We note 'traffic modelling', 'habitats regulations' and 'infrastructure provision' as three examples of vital information that the public is presently almost completely in the dark about.

### **Paragraph 2.14 (The District's Education Centres)**

Objective 3 recommends continued support of the district's educational institutions. This is welcome in so far as education and research are major activities in the area. However, not enough consideration is given to the implications of the recent

expansion in student numbers. Over the past fifty years the student population in Canterbury has grown from none to over 30,000. Para 2.14 mentions a total of 15,000 full time students but this cannot be accurate since the University of Kent has more than this number and it is only one of four universities.

Though some students are good citizens, many disturb their neighbours with late night parties, fail to deal properly with their rubbish, fill the streets with cars and generally do not behave like good neighbours. The owners of student housing outbid local people and raise the price of houses in the area. Large parts of Canterbury, that used to be occupied by families and local people, are now student ghettos. The Girne 'American' University has arrived in the city without any public discussion or consultation with neighbours, and without the land being designated for HE purposes. Local people do not want to see yet more students in a city that already has the highest proportion of students to residents in Europe (if not the world).

Any objective concerned with the 'knowledge economy', should be allied with an objective about requiring the universities to provide housing for more of their students. Within the universities decisions about the expansion of student numbers are made without any regard for where those students will live. Student accommodation is not, of course, included in the target set for new accommodation. However, urging the universities to provide more student housing would free up housing in the city for use by local people, so reducing the need for new build. And the council should use the new legislation relating to houses in multiple-occupation to make sure that no street has more than a small proportion of student-occupied houses.

Large development such as the Girne 'American' University should not have been introduced without public debate. If possible this initiative should be directed to other locations: if it was in Herne Bay the university could still advertise itself as being in Canterbury; if it was in Dover it would bring much needed jobs and money to that town. Under paragraph 6.44 of the LDF document the Girne American University cannot be viewed as a "Development Requirement".

### **Paragraph 6.9 (Protection of the best agricultural land)**

It is difficult to find much mentioned in the whole draft document on the need for Canterbury District to seek to retain its best agricultural land. There is recent DEFRA advice as follows "We must ensure that planning decisions take sufficient account of soil quality, particularly when significant areas of the best and most versatile agricultural land are involved" (DEFRA, 2009, p. 8). This land will be needed in the wake of population explosions in this country and worldwide, and in the wake of rapid land losses due to ongoing sea level rise.

With plans for massive housing allocations on the best quality land in the District then this advice is not apparently being heeded. If there were no alternative strategies this would be excusable, but as we point out below, there are certainly other options that the Council could follow.

We would like the Council to say much more in this LDF Core Strategy about land quality, and we would ask the Council not to cover top quality land in south Canterbury with huge housing estates. Can we remind the Council that in the USA the fastest growing movement today is that of 'urban agriculture'. This quite likely means that it will be coming our way soon – at least we should be prepared!

### **Paragraph 6.11 and Consultation question 3 (Targets for the Green Economy)**

Question 3 is concerned with whether the document captures the broad development requirements for the district. We would suggest that in terms of the Green Economy the document is not specific enough. We welcome the focus on sustainability and the idea of the Green Economy (Objectives 9 to 13). However, of the five objectives under that heading only three actually mention what might be seen as green solutions to the challenges that face us. Even these are very vague and non-specific, despite the fact that there are now some very clear targets for new developments in terms of their impact on the environment.

We would like to see some much more specific targets in terms of working towards a truly green economy in the Canterbury District. In making these suggestions we were inspired by the talk that was given to the Society by John Thorp from Woking Borough Council. For further information see:

<http://www.nationalhousingconference.ie/pdf/2009/John-Thorp.pdf>

For example, we would want to see all new housing built to BREAM Level 6, that is, to be carbon neutral in their impact. New housing should have photo voltaic cells on the roofs, and systems for water saving, and energy efficiency. New estates and business developments should be linked to combined heat and power technology. Woking Borough Council and residents in Woking have seen huge reductions in both local CO2 emissions and in their energy costs. We see no reason why Canterbury should not emulate Woking. This is part of the sustainable agenda that Canterbury District is not yet taking seriously enough.

### **Paragraphs 6.54 and 10.7 (Infrastructure)**

The Canterbury Society is very concerned about the inability of the Council (through the LDF proposals) to provide sufficient evidence on infrastructure provision. At various places in the LDF draft document reference is made to infrastructure provision but most references are made to future infrastructure needs that are to be investigated or which are currently ongoing or are under investigation. Whilst we can appreciate that this must be a difficult area for the Council to contend with, the Council must also appreciate that it is impossible for them to come to any housing allocation option decisions when these investigations are incomplete.

We are concerned here with water, gas and electricity, air quality, road traffic congestion, health and social care, education, open space and so on. In all of these areas Canterbury is already over-stretched. Traffic is reaching (or has reached) saturation point and the Entec Sustainability Study shows that additional traffic growth will be considerable before 2026 even without the extra housing allocations. We already have problems with air pollution and water provision in East Kent is reaching a critical situation. In his recent report on water supply in Kent, Richard Sturt concluded that the 'picture over the next 25 years is bleak indeed' (Sturt, 2006). An additional 10,000 homes in the Canterbury District in the next 16 years will also require perhaps an additional 5,000 school places. Does Kent County Council have the funding for this? We would like to see more emphasis in the LDF on the real infrastructure constraints and on building a more sustainable city.

We cannot accept the statement in paragraph 10.7 that "it is essential that the core strategy is guided by and built into the investment programmes of the infrastructure providers, such as the Highways Agency, Southern Water, South East Water, Network Rail and gas and electricity providers." Surely this is the wrong way round?

Should not plans for developments take account of existing and continuing infrastructure constraints? Surely the locations that we choose for future development should determine where infrastructure will go. What happens if the water companies have no plans to take additional mains to south Canterbury?

We contend that this LDF draft document cannot realistically be placed out for public consultation until there is far more information on infrastructure provision. We additionally contend that the Council officers cannot make any location decisions for what will be 1,000's of houses without much more concrete information on infrastructure.

#### **Paragraph 7.10 Consultation question 4 (Settlement Hierarchy)**

We believe that Hersden should be re-classified as a 'Larger well-served village'. This village has been previously a thriving, well served and well connected village, and since considerable re-development has taken place here during the past decade then it again retains this status. Amongst assets that constitute its claim to larger village status are:

- A population commensurate with a large village.
- Both primary and secondary schools within a short distance of the centre.
- A number of business services - catering, medical, garages, village store, post office, etc.
- A number of community services, e.g. community centre, football pitches, youth club, church, etc.
- Excellent bus connections along the A28.
- The potential for development of a rail station.
- One of the largest business/industrial agglomerations in the District – Lakesview and Canterbury Industrial estates.

We doubt whether all of the listed 'larger villages' have such a range of facilities.

In answer to Consultation question 4 – we disagree with the settlement hierarchy with respect to the classification of Hersden

#### **Paragraphs 8.18 and 8.19 (Option 5) (Larger well-serviced villages)**

We find it odd that the City Council has apparently gone out of its way to 'sideline' potential developments at Hersden. Here is an area that has been 'crying out' for regeneration for several decades, and the area also contains the largest brownfield site in the District. Given that the village is on an excellent bus route, it has a train line with a suitable site for a regenerated rail station, it has a large number of jobs available at the Lakesview Business Park and the Canterbury Industrial Park, it has a wide range of community services and businesses, and it has no particular landscape of value, etc, then this would be a valuable development area. We estimate that the village could reasonably accommodate a further 500 housing units using mainly brownfield land.

We find it particularly odd and unreasonable that, over the past 15 years at least, the Council has taken contradictory views on the development of Hersden, and that there has been a substantial amount of misinformation and/or selective information contained within a range of the Council's documentation. There is plenty of evidence that over this period Hersden has been described both as being an unsustainable area for development and a sustainable area. It has been described as 'too far from Canterbury' and 'adjacent to Canterbury with good transport links'. We also find it odd that the Council has given support to extensive areas of greenfield development

in the village, e.g. Lakesview Business Park and Chislet Gardens, but it has gone out of its way to ignore development on the neighbouring largest brownfield site in the District. It has also gone out of its way to try to classify this large site as greenfield when patently it is a brownfield site, as has been reported by Savill's in their LDF submission and as was determined by the 2004 Local Planning inquiry (Plan is dated 2006).

We are concerned that mis-information was given about Hersden by a Council officer to the Executive committee of the Council on January 7<sup>th</sup> 2010, when it was stated that:

- the rail station might cost £30 million to bring into operation. The facts are that it would cost about £1.6 million and its potential reopening has received support from a wide sector of local and county wide organisations;
- “sufficient infrastructure would be difficult to deliver”. The facts are that there is no reason why it would be more difficult than at any other village, and much of it is already in place;
- that the location “is non-sustainable”. In fact there is no evidence for this and indeed considerable housing and industrial development has been undertaken here in the last decade;
- that it “is not as well-served as the identified villages”. In fact it is better served than most of the identified villages;
- that “they would be lucky to have more than 2 trains an hour” In fact no rural station in east Kent has more trains than this;
- Hersden “is in a prominent location in open countryside adjacent to the village”. The facts are that any development in south Canterbury would be in just such a position relative to Canterbury;
- that future development would have to take place on greenfield sites. In fact future development could almost all occur on the large brownfield site;
- and that the existence of conservation areas nearby would be a barrier to development. In fact this was not a barrier to the Lakesview development or apparently to a now proposed gypsy encampment.

On the last point we wonder why a planning application for gypsy accommodation that abuts the largest brownfield site in the District should have been actively encouraged during the LDF process, i.e. since this surely negates any possibility that the largest brownfield site in the District can be efficiently exploited.

We wish to see the Council re-consider Hersden as an appropriate area for further development, particularly as it has so much potential to be a self-sustaining, well balanced community located on an excellent transport corridor. And we are also concerned that Council officers should at all time seek only to convey neutral and objective information to councillors.

### **Section 8 (Consultation 6) (A “reasonable alternative” that should be tested)**

The public is presently being consulted on eight main options for housing developments within the District, plus the possibility of various compromises between options. We wish to propose the following alternative option. Having considered it carefully with respect to the options suggested by the City Council, and having canvassed the opinions of other groups, we believe that this scenario offers some considerable advantages over what is on offer in the LDF Core Strategy.

Conventional city expansion occurs slowly, sometimes over millennia, in a spatial pattern that can generally be thought of as of having sequential ‘patches of housing’ developed around the central business district (CBD) such that each patch

incrementally contributes to sprawl over the surrounding countryside, and the city generally attains concentric rings of growth. The oldest part represents the city centre and the newest parts will comprise of the outer suburban rings (the Burgess, 1962 model). Obviously rings are sometimes broken by wedges of specialised spatial developments, e.g. an industrial zone. This generalised 'city development' model can be seen all over the world.

However, since the work of Doxiadis and others in the 1960's, it has been recognised that this pattern of growth slowly becomes less efficient. Effectively what happens is that the core becomes choked as residents are dependent on the goods and services provided at the centre, and this results in huge traffic build ups, congestion, time wastage and urban pollution. A reaction to this has been the building of out-of-centre retail developments, but these have tended to encourage increased use of the car. As a response to this incremental sprawl, cities in for instance China, India and the Netherlands, are now placing an emphasis on linear growth along existing arterial corridors where prominence is given to the use of public transport. Developments in the Randstad area of Holland and in Copenhagen, although at a different scale to Canterbury, form excellent examples of this concept. There is no reason why the concept cannot be matched to the scale of Canterbury District along with extensions into neighbouring Districts.

We are thus proposing that, instead of having large additional 'patches of housing' added to the southern extremity of the city, expansion should be concentrated along some of the main arterial routes radiating from the city centre. The main corridor for future growth would be provided by the A28. Here there would be infill development along areas that are already partly built up with ribbon development, but especially at certain nodal points. For instance, to the south-west around Thanington and outwards towards Chartham, and to the north-east from Sturry towards Hersden. Another growth corridor would be along the A290 towards Whitstable, and limited linear expansion could be achieved along the A291 (to Herne Bay) and A257 (towards Littlebourne) routes. We do not see the need to expand along the A2 corridor because this is currently free of ribbon development (it is open countryside) and if development occurred it would significantly impact on the 'entrance to', and 'historical setting' of, the city.

Expansion along these urban arterial corridors would be greatly focussed on improved public transport provision, especially of busses, plus encouragement given to the use of trains from Chartham, Sturry and a regenerated Hersden Halt. We have established (see [www.kingsnorthparishcouncil.gov.uk/planning/planjul20-06.pdf](http://www.kingsnorthparishcouncil.gov.uk/planning/planjul20-06.pdf)) that the likely cost of regenerating the latter station to be in the region of perhaps £1.5 million. The Wincheap and Sturry Road Park and Ride facilities may need strengthening, and when the Wincheap Industrial Estate regeneration occurred, perhaps in five years time, there would be the opportunity to fine tune some of the transport provisions. Enhanced self-sustaining communities could be provided for at nodes based upon Chartham, Sturry, Blean, Broad Oak, Littlebourne and Hersden.

This model for Canterbury's development offers the following advantages over what is currently being proposed in the LDF:

1. Urban expansion is still 'attached' to Canterbury in the sense that the hub has linear extensions.
2. It allows for green wedges to be maintained between the linear extensions (and we would advocate an officially established 'green belt' around the city to prevent further sprawl).

3. It allows for better use of existing (and much improved) public transport, e.g. existing bus services become much more self-sustaining because all housing development is within walking distance of existing routes.
4. It allows for genuine self-sustaining communities at a distance from the core. This is in contrast to what is currently proposed where the south Canterbury location would offer little chance of self-sustaining communities emerging.
5. It allows for integration of one of the District's largest brownfield sites (at Hersden) to be usefully used.
6. It does not place large urban expansion directly against existing urban extensions, i.e. simply increasing the sprawl.
7. Much of the infrastructure provision is already in place and/or could be readily upgraded.
8. It does not spoil much open countryside, i.e. it would be infilling along current linear sprawl (ribbon) developments.
9. It would use almost no Grade 1 or 2 agricultural land.
10. Policy SP4 (p.26) of the South East Plan states that in East Kent and Ashford initiatives should aim to "implement appropriate actions to address the pockets of deprivation". This option specifically includes Hersden (a pocket of deprivation).
11. Paragraph 7.10 (p.58) of the South East Plan states. "The regional planning body and the local planning authorities must plan for and manage the provision of housing to enhance the viability of rural settlements and promote a rural renaissance, and thereby meet the long term needs of the rural communities."
12. It could still incorporate 'Green Gaps', i.e. development should not be continuous. For instance the current green gaps between Canterbury and Sturry, Blean, Littlebourne, Broad Oak and Chartham would be maintained.
13. Although the individual parcels of land might be harder to deliver, there is plenty of time before that land is needed.
14. Obviously this option could still incorporate elements of LDF options 1, 2 and 5.
15. Compared with the section 8 suggested preferred option of large quantities of housing at south Canterbury, this proposal better measures up the Council's "Sustainability Objectives" (Table 1, page 10 of LDF Core Document).

Aggregate scoring on the Council's traffic light system (used in the LDF) would be equal or higher than all existing options that are being trialled; and it is only 'deliverability' that would be rated as 'orange'. These proposals would contain a much higher element of sustainability than do the current proposals. Given that the period in which the Framework is based will see massive changes in patterns of energy availability and affordability, plus the notion that sustainability is fundamental to all development, then it is important that strong emphasis is placed on developments that bring public transport to the fore, and which make best use of existing road provision.

### **Paragraphs 8.48 and 8.49 (Housing allocations)**

We applaud the aims set out in the document (paragraph 8.4) about seeking to create, 'new communities designed to a high quality, with a good range of local services to reduce day-to-day dependence on the main urban centres and private car travel, good open space networks, community facilities and opportunities for employment'. However, this would not be achieved by the construction of thousands of houses on the outskirts of Canterbury, from where the residents would stream into the city centre for work, shopping and education. We therefore would like to suggest the following:

Since the figure of 10,200 dwellings in the South East Plan cannot be legally challenged, this now forms the starting point of all considerations. So starting with the figure of 10,200, and after deducting housing completions 2006/9, Local Plan allocations, existing planning consents etc, this leaves a requirement for a further 4016 units for the period to 2026. This figure may alter slightly when the council's Strategic Housing Land Availability Study has been completed.

The Core Strategy presently proposes that the 4016 units required be provided by allocations as follows:

1. Existing urban areas (1500 units)
2. Urban extensions in South Canterbury (2000 units)
3. Urban extensions at Herne Bay (500 units)
4. Larger Villages (250 units)
5. Smaller Villages (20+ Units)

Total 4270

Using this allocation, the impact on South Canterbury (and indeed the rest of the city) will be very significant, especially since this land is mainly both of AHLV status and of the top grade for agricultural purposes. We propose that Hersden be included in the category of Larger Villages and that there be a Planned Village Expansion at Hersden of 500 units.

In the second half of the plan period provision could be made for Windfall Sites around the District contributing about 500 units. This is permissible when there are significant landscape constraints, which there are around Canterbury, especially on the south side. (It would be interesting to find out what contribution "windfall sites" have made over the last ten years). This allocation would then reduce the pressure on South Canterbury from 2000 to about 1000 units which would be a significant improvement on present plans.

So we are suggesting the housing allocation option could look like this:

1. Existing smaller Urban Areas (1500 units)
2. Urban Extensions at Herne Bay (500)
3. Planned Village Expansion at Hersden (500)
4. Urban Extension South Canterbury (1000)
5. Windfall Sites around the District (500)

Total 4000

Having outlined this option as a means of improving on what has been suggested we also ask the Council to investigate our suggestion for an alternative Option to be



tested under Section 8 of the LDF. We would also ask that the Council mentions in the Core Strategy where the 1600 odd houses in the District that are currently deemed as unoccupied fit into the housing numbers. What powers do the Council have to make sure that this wasteful situation does not continue?

### **Paragraph 8.59 (Consultation question 7) Park & Ride**

We are concerned that the Council sees the present necessity for a 4<sup>th</sup> Park & Ride for Canterbury (paragraph 8.59). Given the need for reduced travel demands in the future, allied to the fact that an enlarged Park & Ride facility can be built at Wincheap (situated only one mile from the proposed 4<sup>th</sup> P & R site and connecting to the same A2 road), then the historic setting of Harbledown should be conserved. Having three Park & Ride facilities linking a small city such as Canterbury with the same main road (the A2) seems completely un-necessary.

We wish to see considerations of the Harbledown P & R omitted from the Core Strategy.

### **Core Policy 8 (Consultation question 9) Transport**

It is almost inconceivable that there should be no mention in this core policy of the need for greatly improved and integrated public transport provision within and beyond the Canterbury District by 2026.

### **Paragraph 9.59 (Transport)**

“Transport and congestion will be key factors in making decisions about the distribution of development for the Core Strategy period.” (paragraph 9.59). We agree entirely with this statement. For this reason we find that some of the housing location options to be inexplicable. For instance, Option 1 envisages infill of approximately 1000 units in the City’s urban area but, given the current levels of traffic congestion, air pollution and overcrowding generally, this seems completely unrealistic. But added to this there could be 2000 units in south Canterbury. Nearly all residents of these homes will see Canterbury as their ‘community area’. The 2,500 to 3,000 vehicles owned at these premises will be jostling to get in towards the ring road – and, if the Council’s plans are adhered to, they will all be coming from an arc between the SW and the SE of Canterbury. Wincheap and the Dover roads (the only alternatives) are already very busy, with the former being at a standstill for much of the day. Extended Park & Rides and new slip roads will make very little difference to the traffic generated by the new housing. Unfortunately, where the additional housing is proposed, it is at such a distance from the city centre that car dependence is virtually guaranteed. In terms of existing public transport provision it would be difficult to find a worse quadrant of the city for locating additional housing.

By 2013, under EU Directives, Canterbury will be seriously required to address the air pollution problem. This problem has already reached a very serious situation with an almost continuous ring of pollution encircling the city centre around the line of the city walls. This pollution is almost all generated by road traffic. There is no sign at all that this problem is being countered by any measures that the Council have thus far put into action, or indeed from measures which have been suggested. It is simply impossible to think of the additional problems that the Council are storing up by adding so much traffic building development to the edge of the city. The Council has to really get to grip with adopting measures that oblige people to get out of their cars. This is a major reason why we are supporting our suggested “realistic alternative”

option for housing development which is based on linear public transport based corridors, coupled with genuinely self-sustaining local communities at Chartham, Blean, Broad Oak, Sturry, Hersden and perhaps Littlebourne.

We are distinctly concerned that the Council has produced their plans for housing allocation without the benefits of the results of the VISUM transport modelling. We fear that this will not indicate that the large areas of concentrated urban expansion to the south of Canterbury will prove to be a sensible ploy, and that it would be much better to concentrate on a more dispersed approach. We also suspect that this modelling will indicate that traffic flows in Canterbury in the future will become very much worse than are presently anticipated, and that the building of the A2 slip roads will make very little difference to the present situation.

We would like the Council to delay any Options selection until after the traffic modelling has been completed – to make positive decisions before then would be utter folly.

### **Conclusion**

Because of the complexity of the new planning procedures; the breadth of coverage of this LDF; the huge amount of supporting documentation that was supposed to have been consulted; the relatively short time for responses, and the fact that the council wanted electronic submissions, it has not been easy for the public to make comments on this Core Strategy. But the situation has been made much worse because a wide array of requisite material is simply not available. We do not think that either the Council or the public are in any real position to be making location decisions that cover a 16 year period and which could have the largest implications for spatial change in the city since the Romans invaded and occupied the area nearly 2,000 years ago. We believe that it is essential that the public be consulted again once the necessary documentation is to hand. We also sincerely hope that the public's views, and their democratically elected local council representatives, will be genuinely reflected in the final stages of the Options Report, and thus we are able to discern that listening has taken place.

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