



November 30<sup>th</sup> 2016

Planning Committee  
Canterbury City Council  
CT1 1YW

### **South Canterbury Urban Extension: CA/16/00600**

We commented on this application last June. Since then additional and revised information has been submitted by the applicant and we set out our comments on this below.

The Canterbury Society has a brief to watch over developments in the city and to comment on their impact on the quality of the built environment. Having looked at the revised plans we still have concerns about what is being proposed. We would suggest that further work on these proposals is essential before they can be approved by the Planning Committee.

Our concerns focus on five issues:

- The damaging impact on the visual appearance of the city
- The quality and design of the proposed building
- The lack of social/affordable housing
- The problems with the proposed traffic arrangements
- The impact on traffic congestion in the wider area

#### **1 The damaging impact on the visual appearance of the city**

The beauty of Canterbury depends in large part on its broader situation, with the Cathedral rising above the historic centre and the whole city lying in a bowl surrounded by wooded hills. For many tourists arriving at the city, or students coming to the universities, this is the view which attracts them and which inspires them.

As we pointed out in our last set of comments, the council's Draft Local Plan policy (paras 9.23 to 9.28 and policy HE3) was to keep all the northwest facing land below the ridge as open space, to be a backdrop to views across the city, especially those featuring the Cathedral.

Phase 1A occupies this land, contrary to the council's policies HE3 and DBE3. Within the proposed development is Block 6, which in spite of criticism by council officers and many third parties, still remains of a similar design. Its previously proposed height of 19.9M has been reduced by digging it into a hole, to about 18M above existing levels. Being built of a material described as 'white linear format masonry units' will make it even more obtrusive.

The block will be far too dominant, both when viewed from across the city and within the housing in Barton below it. The so-called 'park' which is proposed below the block is only some seventy metres in width so will not offer much of a buffer zone.

This proposal contravenes the Canterbury Conservation Area Appraisal 2010, which aimed to ensure protection of green slopes and views across the city. The point is reinforced by the NPPF which requires, 'Great weight to be given to the conservation of heritage assets and for any harm to require clear and convincing justification' (para 132).

Historic England and the Coordinating Committee of the World Heritage Site also have serious concerns about the visual impact on the city of the development. The letter from Historic England (23 September 2016) said, 'We think that the scheme would result in harm to heritage significance which you will need to minimise ... before this application is determined'. We fully endorse their concern and suggest that this issue alone is enough to recommend deferring the decision.

## **2 The quality and design of the proposed buildings**

Canterbury has suffered over the past few years from developments in which the initial designs proposed by reputable architects have not been implemented by the builders. Instead shoddy developments have gone up which are now eyesores in our historic city. We recognise that big efforts are being made to build the first stage 1A to high design standards but we are concerned that these standards will not be maintained in later stages.

Corinthian claim that they have based their work on an analysis of local vernacular designs and on an aspiration to build a 'Garden suburb'. We can see some evidence of this in the plans for Phase 1A, but six storey tower blocks have nothing in common with local building styles or Garden Suburb principles.

In the Outline application for the whole site six further 'individual buildings up to 15 metres' are proposed, three of them on the south east side, being very near to the indicated edge of the development. In addition, on a site, shown as for the hospital re-location, a building height of up to eighteen metres is shown. No impact study has been provided to analyse the visual effect that all these would have upon the countryside beyond, including the AONB, which starts just one kilometre beyond the edge of the site. Thus the appearance of the approach to the city from the Dover direction could be seriously compromised. In any case it would appear that there is no likelihood of the hospital re-locating.

We would therefore like to propose the preparation of a Design Code which would apply to the whole site. This would require discussions between Corinthian, the City Council and the local community. The Canterbury Society would be very pleased to participate positively in taking this forward. The Design Code could then be used in discussions with builders as other areas of the site became available for development.

## **3 The lack of social/affordable housing**

No social housing is included within the 142 dwellings of Phase 1A. Worse than that, reference to the Design Statement and Savill's Viability Assessment reveals that there will not be any on the whole site until 565 units (14%) have been built. This appears to be contrary to the requirement of the brief that such housing be carefully integrated into the scheme to be 'tenure blind'.

Canterbury has a severe housing problem, with many local residents unable to afford what is currently for sale or rent. The local authority housing waiting list numbered 2269 in 2015, up from 1734 in 2014. Affordable housing is one of the prime concerns of local residents, but this proposal does very little to help the situation.

#### **4 Problems with the proposed traffic arrangements**

We commented at length on this issue in our previous representations. There has been more local concern about the plans for traffic and transport than about any other aspect of this proposal. Here we summarise some of our continuing issues.

The 'Fast' bus route to the city centre is a key part of the proposal. We understand that Dover Street is no longer proposed as a part of the route but there will still be an unacceptable burden imposed upon Nunnery Fields and South Canterbury Road, as Stagecoach have pointed out. The other issue remaining completely unresolved is the "missing link" in the route between Nackington Road and South Canterbury Road. This was raised with Corinthian at the consultation meeting on 7<sup>th</sup> May 2016 and we were assured that negotiations were ongoing. Nearly six months later there is no information about pushing the route through the land of Chaucer Hospital and Kent & Canterbury Hospital together with the area between them. In any case, that part of the route is not part of this application as it is clearly outside the site outlined in red.

In a previous representation, Stagecoach were concerned about the capacity of the bus station but in their latest submission, dated 24th November 2016, they state that the issue is still unresolved. They note that the frequency of Service 25, along South Canterbury Road, has been reduced from 7-8 minutes to 10 minutes, 'largely because of bus station congestion'.

It seems to be the case that Stagecoach was asked by Corinthian if there was capacity on their existing buses for passengers from Mountfield Park. Apparently there is not, which gives rise to doubt regarding Corinthian's willingness to finance enough new services.

It is clear that Stagecoach foresee journey times increasing with the new development. Studying their current timetables shows the great increase in journey times during rush hours. They note that 'schedule recovery opportunities' (which means more buses) are required at these peak times. Corinthian has promised a six minute frequency at peak times which would present a great challenge.

The capacity of the bus station is yet another unresolved issue. The bus station cannot be expanded and Stagecoach state that the provision of 'a remote layover area would be costly .....and be largely self defeating in terms of congestion'. The applicant yet again states that a bus service would be provided to Canterbury West Station. No methodology is shown for this and again, bus station capacity would be an issue together with the lack of bus facilities.

#### **5 The impact on traffic congestion in the wider area**

Canterbury is already highly congested, with traffic jams affecting the city for much of the day. What is proposed can only make things worse. Here we can only outline the problems and offer some possible solutions.

Ideas for an eastern Outer Ring Road and a New Station near the Mountfield site were raised at the 7th May consultation. Within the application it is stated that KCC had been given finance to investigate the cost and viability of this possible ring road. No such investigation has been provided. What has been produced by Corinthian are two sketch routes indicating possible lines, but they do not form any part of the application. The inner one, through the site, would be an urban route only limited to 30mph, whilst the outer one would be on green field land with severe cost and landscape implications. The granting of consent for the current application could prejudice future consideration of such a road.

Consultation has been undertaken with Network Rail but purely regarding safe working and construction near the line. There is no indication of any liaison or discussion regarding a new station adjacent to the site.

None of the above takes any account of all the other many proposed developments in and around the city which will no doubt also create more congestion, while relying upon extra buses to achieve a modal shift from the car to the bus. It seems that there is no holistic approach to any aspect of transport planning in the city. This is an issue which urgently requires further discussion.

It has been suggested that travelling patterns will alter to encourage people to walk or cycle around the city. Such a modal shift in travel patterns requires leadership and cooperation between a number of different agencies. We suggest that planning permission should not be given until it is clear who will take the lead in creating this modal shift.

## **Conclusions**

Sadly it has become apparent that community engagement with local residents, which got off to a good start on May 7<sup>th</sup> 2016, has had no follow through. Likewise, many of the comments by the City Council, by Historic England, Stagecoach and others have been largely ignored.

We would suggest that this proposal is in excess of what the City Council envisaged in its Draft Local Plan, and that there are serious concerns about the impact of the proposed development on the visual appearance of the city, on the provision of social housing, on many aspects of transport and traffic congestion and on air quality.

Therefore the Canterbury Society urges members of the Planning Committee either to refuse consent or to defer it in an attempt to achieve some resolution of the outstanding issues. To approve the proposal in its current form would be an unsafe decision.

## **Contact details**

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