

[REDACTED]

28 May 2024

To: Canterbury City Council

Draft Local Plan to 2040 – Response

I welcome the opportunity to respond to the City Council's Draft Local Plan for the period to 2040, and first wish to place on record my appreciation of the hard work and the long hours which council officers must have put into the development of the document.

The Draft Plan is a massive document: the second section alone runs to 267 pages – about the length of my copy of Charles Dickens's novel 'Great Expectations'! It is not easy to navigate the online version (trying to draft a response by letter/email or by completing the questionnaire involves much dodging to and from the document) and I fear this alone will deter many local people from even attempting a response, unless very determined. For this reason I am only able to select a limited number of issues in the Draft on which to respond. Use of the questionnaire is a fair compromise, but in my experience questionnaires frequently do not ask key questions they should be asking. I prefer a written response. I would also make the point that to give a full response to the whole document, plus the accompanying drafts, requires more time than you have allowed for responses.

Though I now live at a distance from the Canterbury district, I know it well, having been born in Whitstable and lived there for more than 60 years. I continue to take an interest in and a concern for the area's wellbeing. Most of my response will focus on Whitstable.

The Draft District Local Plan

Policy SS3 Development Strategy: Spatial Strategy

(1a) The projected housing target represents a massive overdevelopment in the district and, despite pressure from governments, must be reduced. The rate of expansion of the coastal towns since 1960 is unsustainable. The coastal strip of open countryside north of the Blean forest, is now seriously threatened. When the three possible options for the A299 upgrade were put forward just over 30 years ago, the then Council stressed that if the out-of-town bypass route were adopted, it would not mean that housing and other development would automatically spread out to the bypass, yet that is exactly what has happened, as we feared it would. In places, development, in which I include semi-industrial solar park sites, has spread beyond the bypass. Examples are the new Strode Farm estate in Herne Bay and the solar panel sprawl at West End of Herne.

See attachments A and B (Built areas of Whitstable and Herne Bay in 1960 and 2024). Comparison of the two shows the extent of "urban sprawl" that has increased in the past 60 years.

Policy SS4 – Infrastructure Strategy

(2j) I do not accept the need for a new reservoir at Broad Oak. It may create some (water-based, mainly) leisure opportunities, it would destroy others, which are pursued by more people, such as informal walking for health in a quiet rural location. It follows that I do not agree with the promotion of infrastructure linked with reservoir leisure use.

2. Canterbury Vision

(2.1) The demise of the city centre as a shopping hub needs addressing. There are few 'real' shops, so that for normal home shopping resident must migrate to the outskirts retail parks.

Policy C12: Land north of the University

The proposals are unacceptable, as they represent urban sprawl stretch far outside the city's central hub. "A new rural settlement" is a grandiose way of describing a very large housing estate. It will threaten, not enhance, the neighbouring Blean Woods landscape area.

Policy C15: Land at the former Chaucer Technology School

A comment: a "landscape buffer" round the site boundary is not a true open space (as shown on the plan) and cannot be described as such.

3. Whitstable: Whitstable Vision

The "vision" is bland and vague. Yes, the town is in one way a success, but only in that it attracts visitors, and the numbers of these now threaten to destroy the very character of the town that attracts them. For many residents, the town is so overcrowded at weekends and peak holiday periods that it becomes almost a no-go area.

Whitstable Town Centre

(3.1) Again, like Canterbury, the centre of Whitstable has few 'real' shops. The impression is of a whole series of small eating places and "posh tat" shops. How do you build on that? Allow even more tat shops?

Policy W1: Whitstable Town Centre Strategy

2. "Night time economy" – further provision not desirable and strongly opposed. It is disruptive to residents.

Whitstable Urban Area

(3.6) I disagree. Whitstable (and Herne Bay) cannot expand northward. Canterbury could, in theory, expand in any direction, Therefore, Whitstable, as a small town of about 25,000 in 1960, has, in proportion, expanded its built area very considerably, compared with both Canterbury and Herne Bay. It has, in short, done more than its fair share of expansion.

I also disagree that Whitstable has "excellent connectivity with HS1" trains. Its connectivity outside peak times is far worse than that of the Thanet towns, and Swalecliffe and Chestfield come a poor third – have the compilers of this draft tried recently to take a train from Chestfield to London Victoria? Or a daytime high speed train to St Pancras without changing trains somewhere up the line?

(3.7) No slip roads are wanted or needed from the A299 to Chestfield (see later comments on the Brooklands Farm proposals). They will create new rat-runs through Chestfield and South Street and add to congestion at the Chestfield and Tesco roundabouts on the A2990. They will not relieve congestion, merely move congestion somewhere else.

South Whitstable – Strategic Development Area

Note (3.9) – I would not call Bodkin Farm "South" Whitstable – East Whitstable, certainly.

(3.10) Brooklands Farm is wholly unsuitable for major housing development and must be retained as fully open countryside with a high landscape value, perhaps the last surviving stretch of broad country landscape that Whitstable possesses.

In the year 2000 the City Council commissioned the Kent Environmental Consultancy to undertake a landscape appraisal for Herne Bay and Whitstable. The report was approved by the City Council's Economic and Strategic Planning subcommittee on 8 June 2000. This part of Brooklands Farm came within the Blean Woods Special Landscape Area (Landscape Designations map on page 15 of the report). This area and neighbouring ones to east and west are described as well-wooded, with mixed open farmland and pasture, and, according to the report, are of high landscape value, and can be even better enhanced, though threatened by neighbouring and visible hilltop developments. The report appears to have been ignored by the Draft Plan 2040 compilers/revisers. Are memories so short at the CCC offices?

See Attachment C (Map on p15 of Landscape appraisal for Herne Bay and Whitstable, 2000, showing Brooklands farm designated part of Blean Woods Special Landscape Area)

Further, the Brooklands Farm area is in the catchment area of the Swalecliffe Brook and two tributaries, one from the direction of South Street, the other running alongside the public footpath from Chestfield Road (near Radfall Corner). This is part of an elongated basin, bounded by high ground, stretching from Chestfield to Court Lees, with a 'pinch-point' at the Red Bridge in South Street Road, and traditionally an area of open pasture and mixed farmland with copses, shaws and woodland. The steep slopes down to the brook drain quickly, so that it soon flows into full-spate. It has frequently flooded low-lying parts of Chestfield, particularly around the Grasmere Road area and north of the bridge in Herne Bay Road, Swalecliffe, near Brook Road, out as far as the sluice at the bund near St John's Church.

The Grasmere Road/Shepherds Walk area, before the houses were built, was so frequently under water that its only use, and designation, was as Common land. The problems began once the houses were built and have persisted ever since.

14 WHITSTABLE TIMES, FRIDAY, SEPTEMBER 20, 1968

BLACK SUNDAY

CONTINUED FROM PAGE 1

Floodwater did break out of the backwater through, making even deeper the water already flooding Westgate Terrace, Reservoir Road and Westmeads Road.

The crisis began at eight o'clock on Sunday morning when the storm water from Saturday night's deluge filled the sewers to bursting point.

FIRST REPORTS

When they couldn't hold any more, the water burst out into the streets, hitting first the Belmont Road area; the first reports of flooding came from houses in that road.

Manhole covers were lifted

Road/Belmont Road junction to the main street was under two feet of water.

At one garage at Millfield Manor, at the end of the cul-de-sac, flood water reached the steering wheel of a car.

The water gushed along Stream Walk. Flooding spread across the Cromwell Road area, Regent Street/Acton Road/Warwick Road area and on to Reservoir Road and Westmeads Road.

Flooding began at the rear of Tower Parade properties around nine o'clock on Sunday morning and before long was lying 18 ins.

residents began moving furniture upstairs.

By 11.30 the water was rising through the floorboards in Acton Road and was soon lapping the skirting boards. It rose to about a foot deep throughout the houses.

Houses on both sides of Warwick Road were flooded. Here it appeared in the houses just after midday and rose several inches very quickly.

FACTORIES FLOODED

The flooding brought temporary chaos to the factory area in Berestford Road. At Messrs. C. W. Woodward's lingerie factory, directors and staff worked through the weekend to save valuable materials and mop up the water, which at one time was about 15 inches deep on the factory floor.

Said managing director Mr. C. W. Woodward: "Despite the mess, we were lucky. A consignment of material due from America on Friday and worth £4,500, did not arrive. Due to its bulk and the difficulty in moving it, it would almost certainly have been lost."

Mr. Woodward paid tribute to the magnificent way in which employees worked to get the factory working again. "They have been working like Trojans," he said. He estimated that the floods cost between 500 and 600 dozen garments in lost production time.

Unfortunately, as soon as the factory was cleared after the weekend floods, the heavy rain of Monday night left it awash again on Tuesday and the drying out process had to start all over again.

Yesterday (Thursday) the factory, which employs around 100 girls, was back in production, trying to catch up on lost time.

The L.C.P. engineering factory across the road was more fortunate. They were flooded only once, avoiding Monday night's deluge by sandbagging.

All of the electric motors working the lathes had to be located under 14 inches of flood water, taken out, and sent

through the water. A party of them inched their way along garden walls, the tops of which just poked out of the water, to speak to residents trapped upstairs.

THREATENED

In nearby Reservoir and Westmeads roads and Westgate Terrace the flood water was lying knee deep and homes in that area were further threatened as the level in the backwater rose to the top.

Tens of thousands of gallons were being pumped out of the backwater, but the level still rose dangerously. And by half past five the backwater was flooding across Lane's Walk and Westgate Terrace.

Houses in Westgate Terrace, between the junction with Reservoir Road and Station Road, soon had water flowing in and in the other section of the road it was lapping the floorboards.

Men and children waded along the flooded street to meet Council lorries and dumpers loaded with sandbags. Doorways and air vents were hurriedly blocked as the water rose.

DANGER PASSED

Between five-thirty and six-thirty the flood level in those roads was at its highest. After seven, when the main danger had passed, the level began dropping slightly as water was able to flow back into the still swollen backwater.

During Sunday more reports of flooding came in.

The road at the junction of Ham Shades Lane and Foxgrove Road was under water. So, too, was the road at the St. Swinton's Road/Swalecliffe Road junction.

As water swept across the road at Bartlett's Corner, residents of Ham Shades Lane began to fear that for the first time they could become flood victims. Gardens flooded, but little water got into the houses.

Mrs. Grace Douglas, of "Tantallon," Ham Shades Lane, told us: "I have lived here for 30 years, but we have never had flooding like this before. The water rose to within a quarter of an inch of our back door. Had the rain carried on any longer we would have been flooded out."

The low-lying area of Seasalter Golf Course was one vast lake and in nearby Cornwallis Circle the roadway and the green itself were under water.

WAY BARRED

Outside the worst hit areas, flood water seeped through the floorboards of houses in the Essex Street/Kent Street area and in Gordon Road.

People living in the Church Street area found their way into town barred by the floods and were forced to drive out to Thanet Way and back into town via one of the roundabouts.

A nursery school building, belonging to Mrs. Valerie Barnaby, of Booth Cottage, Shepherd's Walk, was flooded to a depth of about two feet and a house opposite in Grasmere Road was flooded when the Swalecliffe Brook burst its banks on Sunday.

No damage was done in the nursery school building and Mrs. Barnaby was able to hold school on Monday.

On Tuesday, however, the brook overflowed once again. No buildings were flooded, but the gardens of many houses were under water.

Rail travellers on Sunday walked to Whitstable and Tankerton railway station carrying their shoes and socks. To get to the station they had to walk through flooded sections of road in which the water at times was two feet deep.

MORE CHAOS

Heavy rain during Monday night brought more chaos on Tuesday—mostly among traffic.

As cars, lorries and buses swept into Whitstable bound for Tankerton, they found the section of Harbour Street between Sea Wall and Northwood Road was under water so that fire pumps could work unhindered.

For a time, the long line of traffic stretching from the foot of Borstal Hill, right through the High Street, was turned back on itself and re-routed back through the High Street and up the foot to Thanet Way, where it made for side turnings leading to Tankerton.

Bus passengers waited at stops for double-deckers that never came. While the road closure lasted the buses stopped on the outskirts of the town and passengers had to walk the rest of the way.

Tuesday morning's flooding was at its deepest at Belmont Road and Cromwell Road, but by mid morning pumps had dispersed most of it and the traffic flow returned to normal.

"ONE OR TWO PEOPLE GOT NASTY"

"There have been very good relations between all the people in the public services side and the people who have been flooded," said Mr. B. E. Hardy, the Council's surveyor.

"I've had very little complaint, although one or two people got a little nasty."

Good relations with the flood victims made a tremendous difference to the men on relief operations; it gave them great encouragement, he said.

WONDERFUL HELP

"I think we've had wonderful help, especially from the firemen."

Mr. Hardy answered one question raised by many people during Sunday's flood: why pumps were taken away from the backwater to other parts of the town.

"What some people don't realise is that because they don't see us at the backwater it doesn't mean that we're not doing anything."

There are two problems—the backwater and the bottleneck in the sewers—and we actually find it better to take away pumps from the backwater and put them into the town."



MAN FROM THE MINISTRY

Press coverage of flooding, including Grasmere Road area and the Red Bridge (South Street Road), 1974:

estable

IMES

Tankerton & Swalecliffe Press

DAY, 15 FEBRUARY, 1974 Tel : Whitstable 62361/2 4p

HARBOUR GARAGE



RENAULT

300 BONUS STAMPS
FOR PETROL AND OIL CUSTOMERS

ASK FOR DETAILS

WHITSTABLE 61477-8-9

Winds reach over 100 m.p.h.

DANGER
FLOOD

HURRICANE

Storm's trail of devastation

HOWLING gales reaching over 100 miles per hour left a trail of floods and damage throughout the Whitstable area this week.

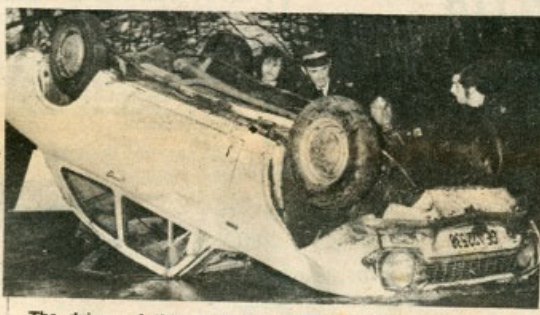
It was one of the worst storms for over 300 years with homes and roads being flooded and hurricane force winds bringing down trees and overturning caravans.

Force 12 winds made driving hazardous, and road conditions became worse as stranded motorists deserted their vehicles because of rising torrents of water. Some of the highest tides of the century threatened the sea wall defences in many areas.

Mr. Leslie Kingsmen of Kimberley Grove, Seasalter, fought against time on Monday morning pumping water from an elderly neighbour's bungalow at 72 Faversham

Road. He threw sandbags around the garden to prevent floodwater streaming through the premises and borrowed a motor pump to clear the water.

A Ford Escort car ploughed through a stream across Thornden Wood Road on Monday afternoon and spun over on to its roof in the severe gales. The driver was taken to Kent and Canterbury Hospital suffering



The driver of this Ford Escort was taken to Kent and Canterbury Hospital on Monday after the vehicle skidded and overturned in Thornden Wood Road during the hurricane force winds. The road was also covered in a torrent of storm water. CA1692



Major H.J.R. Turner of Sparrer Court, Molehill Road, Chestfield, was unable to stop flooding in part of his house even with the help of sandbags. WA1698



Residents' gardens in Grasmere Road, Chestfield, were badly hit by floods. WA1697



Mrs. Gray of Becketts Croft Grasmere Road, Chestfield, sweeps away the mess left by an overflowing sewer. WA1699

● PAGE 17

GALES AND FLOODS HIT TOWN

PIC SPECIAL

FROM PAGE ONE

ing from shock and cuts. His car was severely damaged. Three caravans at Seasalter's Church Army holiday camp were also damaged as they toppled over into the flooded ground several feet deep in water.

Chestfield residents had an additional problem with the storms — sewage started overflowing into the road. Colonel Charles Compton, chairman of the Chestfield Preservation Society, told the Whitstable Times that the Grasmere Road foul water sewer was normally "quite adequate", but a couple of years ago surface water drainage was channelled through the sewers which now led to overflowing during heavy storms.

WORRYING

"It's very worrying for the residents and very unpleasant for them," he added.

Several people in the Chestfield area had a running battle with flood water, but avoided severe damage by barricading their homes with sandbags.

Many of Whitstable's sports grounds were under several feet of water, and even if the weather holds off, it looks as though they will be out of action for several weeks.

Two Crescent Lineships have been sheltering in Whitstable harbour for over a week, while the Amey 1 dredger was unable to meet its work schedule over the weekend because the hurricane winds threatened navigation and safety.

ROUGH

Captain Bob Lake of the Amey 1 said: "We had to shelter off Sheppey on Saturday night because of the incredible sea. We were returning from Essex, and I've never seen the Thames Estuary so rough in my life. One ship passed us out there and we could hardly see it because of the enormous waves and sea spray which enveloped it."

Driving to work early Monday morning ended in a Whitstable man being soaked to the skin having rescued a mother and her two children from rising flood waters at Hampton, Herne Bay.

He was Mr. Allan Brown, of 18 Sydenham Street, who was on his way to the ambulance headquarters in Sea Street, Herne Bay.

Unable to drive through Sea Street because of severe flooding, he cut across Studd Hill to Hampton where he found Mrs. Sheila Silcock shouting for help with water up to her waist.

"She was in a bit of a state, soaked right through with her children trapped in her Ford Granada" Mr. Brown told the Whitstable Times. "The flood water was lapping up the side of the car door. I decided to go on to the ambulance station, pick up some help and bring an ambulance over to her."

"Ambulance man Pete Bartlett was just coming off duty so he took his car to the scene. Myself and John Clutterbuck took the ambulance. We managed to rescue the two young children from the car and took them and their mother to their home at Hotel St. George, Herne Bay."

"By the time we finished the operation we were absolutely soaked to the skin and freezing cold."



Many roads in the Whitstable area were flooded this week, causing chaos and confusion. This picture was taken along Faversham Road, Seasalter. WA1687



Mr. S. W. Millen of Dunroamin, Rayham Road, Whitstable blamed his flood dilemma on Whitstable Council. He awoke at 5.30 on Monday

morning to find water dangerously close to entering his bungalow. The fire brigade were called and they used a pump to lower

the water level. But Mr. Millen says that because the council allowed new houses to be built on nearby drains, the water collects in his garden. WA1689



Swalecliffe Brook turned into a raging torrent on Monday when rain draining from adjacent farmland swelled the normally tranquil stream into a flood danger. Here the brook drowns the road at South Street. WA1684

The Draft Local Plan indicates a massive 1,870-units housing development on both sides of the brook at Brooklands Farm. Runoff from a newly impervious surface created by housing, roads, pavements, hard

play/car parking surfaces, etc. will be seriously increased, with disastrous results – wider and more serious flash flooding in Chestfield than at present occurs. I am surprised that the authors of this section of the Draft Plan appear to have so little understanding of the drainage regime in the locality.

The former sewage treatment works built in Swalecliffe in 1914 coped reasonably well, serving a smaller built-up area, but despite modernisation in the 1970s and 80s, subsequent growth of Whitstable's built area has rendered it unable to cope – hence the frequent sewage discharges during periods of heavy rain. That problem will get worse with new housing and increased rapid runoff at Brooklands.

For both those reasons, this section of the Draft Plan is seriously compromised and has no future.

(3.18) A new road junction with the A299 is therefore irrelevant: not needed and serving only to create new “rat-runs” for traffic along Chestfield Road and South Street, and new congestion at Chestfield and Tesco roundabouts. The Draft Report on Transport talks about wishing to deter car use; a new junction here on the A299 will only encourage car use.

W4 Access and Transport (not “transportation”, please! See note under Transport Strategy below.)

(4v) Sadly, we have lost all on-road safe cycling routes in the remaining countryside areas of the coastal towns of Whitstable and Herne Bay. We used to cycle safely along Fox's Cross Road, Pye Alley Lane, Bogshole Lane, South Street, Chestfield Road, Molehill Road, the pre-bypass Owl's Hatch Road, Bullockstone Road and Hicks Forstal Road to reach Hoath and Chislet. Most of these roads are now used by cars as high-speed rat-runs, so that cyclists are at risk. I very much warm to the idea of, for example, reducing at least part of Molehill Road to a green lane, accessible only by non-motor vehicles and on foot or horseback.

Attachments to this response:

- A. Whitstable and Herne Bay built-up area in 1960
- B. Whitstable and Herne Bay built-up area now (2024)
- C. Map (p15 of the Herne Bay and Whitstable Landscape Appraisal report, 2000), showing Brooklands Farm as part of the Blean Woods Special Landscape Area.

The Transport Strategy

Section (2.2) I realise that the Census took place immediately following Covid lockdowns, but I believe that, within a fairly short time, journey figures will revert to what they were just before Covid, once full confidence is restored in the public. Already, people working from home since Covid are having second thoughts and are returning to the collaborative workplace, involving travel. I therefore think that any proposed actions based solely on 2021 journeys are short-sighted.

(4.2) I fully agree with the “Monitor and Manage” approach as a sensible approach to transport planning (I note your wrong use of the American-English word ‘transportation’. In British-English, transportation was the punishment meted out to criminals, by sending them overseas for a fixed period or for life! The British-English word for means of travel, or the process of travelling, is ‘transport’).

(Section 5: Bus) The very welcome aims listed in the Draft have already been frustrated by the bus company's crazy, illogical and poorly thought-out changes to routes and timetables in the Whitstable, Herne Bay and intervening districts (especially Swalecliffe), as of May 2024. Bus is now, in consequence, an even poorer choice of transport for those without cars, than it has been hitherto. Fresh pressure in the

short term must be brought to bear on the company to provide a better service and experience for residents.

(Section 6: Walking/cycling) (6.4) Here we must distinguish between cycling for leisure/health and cycling for a purpose (e.g. to go shopping, to get to school/work). The draft glibly refers to new developments having safe cycleways into town, but the town centre will be far away from any future new estates. Only the very keen fitness cyclist will benefit; cycling will be impractical for most residents. How will they carry shopping bags/heavy schoolbags/sportsbags? Will all bikes need trailers for luggage? A trailer/toddler buggy will not go into a cycle locker in town! How does a family with small children get into town? We are many decades behind The Netherlands and Denmark. These issues need addressing.

Walking any distance with heavy shopping will be impractical for many older folk, who may still be stuck with an infrequent bus service, always supposing there is even a basic bus out to the new estates.

(6.6) Cycle lanes on carriageways are dangerous – the presumption must be for all new cycle paths to be off-road.

(6.7) In theory, cycle lockers are a good idea, though impractical for the hoped-for increasing use of cycle trailers/baby trailers (see 6.4 above). However, the lockers should be free to use, or require a very small fee, such as a child/teenage cyclist could afford to pay. They should not be seen as a major source of revenue. Yes, they will be expensive to install, but funds raised by locker charges should just cover costs and maintenance, and no more.

(6.8) Cycle hire schemes presuppose that cycles can be picked up or dropped off anywhere – this can be open to abuse, though the principle is important for real flexibility and convenience. I question how this will work in practice in Canterbury district's more rural areas. Note – the cycle-route map accompanying this section is of poor definition and wording/legend cannot be read when the digital version is enlarged. I got the gist of it, but little more.

(Section 7: Railways) Suggested rail improvements largely agreed, though Herne Bay, Chestfield/Swalecliffe and Whitstable do not have good all-day access to the fastest trains to London. Chestfield to Victoria can now take as long as it did, or longer, than in the days of steam!

(Section 8: Park and Ride) (8.2 and 15.4) I would welcome easier access to a Canterbury park and ride from the Whitstable direction. The reopening of the Sturry Road P&R is welcomed, making access to Canterbury much easier from the Tyler Hill direction.

(Section 9: Accessibility) (9.4) The aim in the shortest term should be for all pavement parking to be banned. The problem outside schools, especially, is ongoing.

(Section 13: Medium-term Transport Strategy) (13.6 and 13.7) Strongly approved, Even for a motorist, these roundabouts can be hazardous and lane markings awkward to follow.

(Section 14: Long-term Transport Strategy) The possible use of autonomous vehicles serving smaller villages is interesting, but current stage of AV technology falls far short of what is desirable and safe. Experimental autonomous buses are currently very slow (little more than walking pace) and the intermediate passenger stop technology not always reliable. I have experienced one such service in Norway that was not wholly successful, as the bus sensors could not "see" other vehicles when snow was falling, in fog, or in heavy rain.

Note – the table on p29 is unclear, partly because it uses jargon such as "2011 census mode share". Define your jargon, please!

(Section 16: Highway Infrastructure Schemes) (16.3) Table of potential development sites and key infrastructure: Brooklands Farm. Reference to on-off slip roads on coastbound A299. Slightly confused as to whether slip roads also to and from London-bound carriageway, but presume not? As I strongly reject *any* attempt to designate Brooklands Farm as a potential development site (see Housing section of the Draft), it follows that I equally strongly object to any slip roads off or on to the A299 from South Street Road. Access from and to A299 from there will create vehicle rat-runs through Chestfield and South Street, leading to serious high-peak congestion/pollution at both Chestfield and the Tesco roundabouts. In your introduction to the Transport section of the Draft Plan, you make it clear your wish to *reduce* dependency on the car: providing such slip-road access will have the opposite damaging effect!

Michael R Whitley