

Draft Canterbury District local plan 2040

Comments and objections to the plan by Clive Bowley (June 2024)

Preamble

These representations constitute a personal objection by Clive Bowley to various of the policies in the Canterbury section of the Draft Canterbury District local plan 2040.

Clive Bowley is a long-term resident of the city, an architect and heritage professional with a profound interest in the history and topography of the city and its setting. For many years he was the City Council conservation officer.

Comments:

in general terms, I wish to comment on and object to some of the policies and some of the proposed development allocations contained in the Canterbury section of the draft Canterbury District local plan 2040 for the following reasons as follows:

The emphasis on Conservation.

Policy SS 1 para 4 mentions the heritage assets and the UNESCO world Heritage site, but I would suggest that that this policy should be rather more specific, about the need to conserve the urban fabric and spaces of the city and that this should be one of the primary strategic objectives of the plan.

There should also be more mention of 'preserving and enhancing the setting of the city' – perhaps emphasising this rather more than is suggested by the last part of the policy. The phrase "*whilst incorporating appropriate innovation or change, such as in scale, form and density and creating inspiring new buildings and places*" is, in my view a bit of a get-out clause. In reality, very little of what happened in the last two or three decades, has actually achieved *inspiring new buildings and places* apart from a few developments by the king school and universities. I suggest that this statement needs to be edited down to saying just, "*whilst creating inspiring new buildings and places*".

Policy. SS 2, para3 aspires towards "*sustainable complete, compact developments with high levels of connectivity*" etc, but the various site allocations that follow, fail to achieve this, instead, appearing to promote more spread out suburban style development sites.

General Development strategy for the city (policy SS 3)

In general terms, there still seems to be far too much concentration on development in Canterbury, and it would seem appropriate to direct more of the new housing development sites towards the coast, and in particular Herne Bay, where the infrastructure is more capable of dealing with it and where the setting of the town is less sensitive than it is around the historic core of Canterbury.

The overall housing figures still seem unacceptably high, given the significance of historic Canterbury, the importance of the setting of the city, defined by the valley sides of the Stour and the impact that such significant growth in population will inevitably have on the historic city centre.

Transportation policy. SS 4

Whilst welcoming the objective of making the shift towards sustainable transport, this seems more aspirational than achievable. The recent contraction of Stagecoach services in the area serves to demonstrate the reality of poor service, which needs to be addressed in the longer term.

The city needs more radical transport solutions than merely improving the bus service and adding a few cycle routes. For instance, significant improvements in public transport might possibly include:

- interspersing local services with mainline trains on the Chartham – Canterbury – Herden east-west axis.
- The possibility of creating a light tramway connection between the city and settlement growth in Blean by reopening the Canterbury Whitstable railway route.
- Provision of a new light tramway line from Mountfield's into the city centre, this utilising the former Elham Valley Railway rail route alignment.

Only with such radical solutions might there be a real transfer away from car based on journeys.

Infrastructure strategy – policy. SS 5

This is full of worthwhile objectives, but none of these are actually within the gift of the council and are mostly reliant on central government action.

It seems curious that this section makes no mention at all of the constraints on the drainage system (the Stodmarsh issue, etc)

Canterbury city centre sites

I'm generally supportive of the city centre regeneration sites identified in the key, diagram. However, I would urge that these are only developed in a way that matches and responds to the scale and character of the locality, rather than 'forcing' the sites in the way that has been done recently at the Canterbury Riverside development. (Referring back to comments on **policy. SS2, paragraph 2**). This restraint is particularly important at sites C2, C3, C4, as listed on the Canterbury City Centre, key diagram.

I take the view that **opportunity site 3 (North Lane Car park)** and **site 7 (Pound Lane Car park)**, are particularly sensitive and are not really suitable for any built development and that improvements to these particular opportunity sites should be limited to environmental enhancement only, preserving a limited degree of local parking.

I know that the Ivy Lane frontage of the Longport car park is an existing allocation, but here I would urge that the *whole* of the Longport car park is included as a redevelopment site. This will offer the prospect of reinstating the urban form of Longport (one of the city's great mediaeval marketplaces), which was lost to wartime bombing and the layout then destroyed by post-war road improvements. Regeneration here could include the elimination of the Longport roundabout, which is now effectively redundant, so as to help regain the historic frontage lines of the mediaeval marketplace.

Policy C1 city centre strategy

Generally, these are fine as far as they go. It will be good if the conservation policies were strengthened, to encourage the conservation of the city's buildings and the restoration of the form and paving of its historic urban spaces.

Whilst **para 5 encourages the retention of office accommodation**, this policy should be qualified by also encouraging reversion of office spaces in historic buildings back to residential use. There is currently frustrated pressure to do this and the office spaces lost in this way are, often not of high quality. This policy needs to be better tilted towards encouraging restoration of buildings and their original uses.

para 11 relating to transport seems aspirational but doesn't seem to offer any real solutions to the city's transport issues. (*See comments above on transport issues - policy SS 4*).

Para 12 public realm – again this all seems very aspirational and not problematic, but there does need to be a reference to the need to preserve or restore the character of the city centre and its historic places which have become somewhat degraded by unsuitable paving and street furniture etc.

I remain concerned that the report implies over-exploitation of the Dane, John. It is a historic Victorian pleasure Park for walking, strolling, etc and should not be allowed to become a high-intensity event venue. This aspiration needs to be calmed down.

Policy C 2 St George's Place/ABC cinema site.

This is of course an obvious site for development. However, it's essential that the development should be in scale, and respond to the historic scale of the area. Recent developments in Dover Street and along St George's Place have pushed the limits of acceptable development and these recent developments and the existing bulk of the cinema itself should not be allowed to justify an over-scaled and lumpen new development here.

Strategic development sites.

Previous designations in the 2017 local plan have included allocations which, when built, will have a devastating impact on the setting of the city. It is clear that the decision to allocate these sites was taken without *any* appreciation or assessment of the impact of the development of these sites on the unique setting of the city.

None of these sites have yet materialised, but when they do, the terrible impact of these will be seen by all. In particular, the development of the Mountfield housing area on the slopes rising to the ridge beyond the Barton state will cause incomparable harm to the setting of the cathedral. Sites to the west of Thanington and to the west of Sturry on the valley side rising to Broad Oak will also impact on the character of the Stour valley in a terrible, and regrettable fashion.

Of the fresh sites allocated in this current plan, two sites in particular are of huge concern, these being the so-called **Merton Park site (policy C6)** and yet more development at **Milton Manor (policy C9)** will cause yet further harm to the character of the Stour Valley at this point. It's clear from the suggested layout of both these sites that no assessment has been made of their potential visual impact and it's irresponsible to put forward these sites into the plan without carrying out the visual assessment needed so as to ensure that the most prominently visible parts of the sites are kept free of buildings.

At **Milton Manor (policy C9)**. It seems that *any* further development of this small site here would be visually intrusive, and this small site really needs to be dropped from the plan.

At **Merton Park (policy C6)** it also clear that the layout pays absolutely no respect to the topography of what is a beautiful area of Kentish farmland which extends right up to the Langton Boys' school and Chaucer hospital. Again, this area is extremely prominent and as such forms part of the river valley setting of the city and the impact needs to be properly assessed so as to avoid development in those areas of this site that would impact on the setting the city. Go up the Dane John mound, and you will see what I mean by this!

The Hollow Lane site (policy C7) is also of concern and in general terms, the layout of the 'blobs' of development is wasteful of land leaving meaningless areas of open space between them which will have no coherence and will be of no practical benefit to the wildlife.

The 2000-year old Hollow Lane (the Roman road to *Portus Lemanis*) is of real historic importance and development should not be allowed to crowd in on it as suggested on the indicative plan.

The **South-west Canterbury link road (policy C 11)** is shown on the mapping as an innocent line of dots. In reality, this will be a major highway work, the earthworks of which will devastate the area and will cause the destruction of much of the ancient hollow way of Hollow Lane. The proposals map is dishonest. This really must not be allowed to happen.

Policy C 12 land at Blean, north of the University of Kent.

This allocation has created much controversy, but this allocation will, at least not create any further visual impact on the setting on the city. However this is a landscape of much historic significance and the wholesale development of the land will have a massive impact on the locality. The layout

drawings suggests that this development will, once again, perpetuate the tired old suburban model of development and consideration needs to be given to the idea of concentrating the development here into much more dense clusters, please then allowing the larger part of the site to be **not** developed at all.

The infrastructure aspects of this massive allocation seems not been properly addressed at all, and there seems to be the need to offer a realistic transport plan for the site. One worthwhile option might be if the disused Canterbury/ Whitstable railway line could be reopened and used for a light tramway route back into the city centre. Something like this would really be a game changer for promoting the modal change in transport that really is necessary as the town grows.

Policy C 15 land at the former Chaucer technology School

this land once formed part of the parkland setting of Barton Manor house and, although much degraded in the C. 20th, the siting of houses in the centre of the valley here seems an insult to the wider topography of the area. This site should not be developed at all and remain as open space associated with the new Chaucer technical school.

Policy C. 17th Canterbury Business Park.

This allocation for massive expansion of the existing industrial park here is set entirely within the AONB and is in close proximity to the grade 1 listed Higham House, one of the most significant of the stately houses in our district. Knowing this, how on earth can this allocation be being seriously considered for massive industrial expansion? This proposal needs to be completely abandoned.

Policy C 18 Shelford tip.

This employment site is being suggested to be placed in the midst of the huge waste dump site at Shelford. It seems inconceivable that the idea is being seriously considered as a proposal. Surely the environmental issues associated with the Shelford tip preclude any idea of creating an area for human employment?

I therefore request that these comments on these particular aspects of the local plan affecting Canterbury should be registered as my comment on the Canterbury District Local Plan 2040 - consultation stage.

Yours faithfully,

Clive Bowley