

DRAFT CANTERBURY DISTRICT LOCAL PLAN 2040

OBJECTIONS TO POLICIES SS1, SS2, SS3, SS4, SS5, C6, C7, C9, C10, C12, C19 and R14.

I wish to object to the above Policies in the strongest possible terms.

Policy SS3

1. The development strategy for the District (SS3) is totally wrong. The proposals to continue to make Canterbury the focus for new development in the District and, in doing so, to more than double the size of this small historic town, are wholly unwarranted and unjustified.

2. The Council asserts that “national policies have increased the level of housing growth the government expects in each district” and now put forward plans for more than 8,000 new houses in addition to the thousands already committed, but not yet built, from the 2017 Local Plan. Such growth of a small historic town is completely unsustainable.

3. Canterbury does not, and never will have, the infrastructure to accommodate the huge level of development proposed. The Council has already had to call a halt to much of the development proposed in the 2017 Local Plan, because of the absence of satisfactory waste water treatment facilities and its damaging effect on the Stodmarsh Nature Reserve and the Stour catchment area.

4. In planning parlance the 2017 Local Plan has proved, in a very short space of time, to be **unsustainable**. The new draft Plan proposes “new and improved waste water treatment facilities” but fails to provide any details or convincing evidence that such facilities will be provided in the lifetime of the Plan. The development strategy is therefore **unsustainable** and would not pass the Tests of Soundness set out in paragraph 35 of the National Planning Policy Framework (NPPF).

5. In January of this year, the Minister of Housing and Planning confirmed that the standard method of assessing housing requirements is a starting point for local authorities and does not set a mandatory target. Local authorities can put forward their own approach where exceptional circumstances exist and, if they feel they have a strong case, “they should do so for the good of the communities they serve”.

6. An historic town of World Heritage and national importance must surely be an exceptional case.
7. Because of the lack of the necessary infrastructure, including highways, waste water and social, health, educational and community facilities, the logical response of the Council to the Government's housing figures should have been to tell the Government that the "required" growth could not be accommodated satisfactorily within the Canterbury District.
8. Nowhere in the Draft Plan can I find any explanation of who would occupy these new houses or where they would work, or whether the Council's waiting lists for social housing would be catered for.
9. For nearly 20 years in the 1980s and 1990s, the City Council adopted a **conservation-led** strategy, strongly backed by Kent County Council as the strategic planning authority. In this period Canterbury had its most prosperous period of the post-war years with more capital investment than almost anywhere else in Kent. The same approach led to the successful regeneration of Whitstable and Herne Bay. Investors wanted to have a part in the attractiveness and successful economies of these historic and coastal towns.
10. However, in the last 20 years, the Council has adopted a policy of almost unrestricted growth that cannot be sustained even in the short term. Since the abandonment of County Structure Plans, there has been no strategic planning in Kent and certainly not for East Kent or Canterbury. The professional experience and expertise in strategic and local planning and conservation built up over many years and highly rated nationally has all been lost.
11. Planning policy for a historic town like Canterbury must be one of **conservation and containment**.
12. The "Development Strategy", particularly for Canterbury, appears to be little more than plonking down huge housing estates on land put forward by developers, with no coherent masterplan or strategy, and then blaming the government. There appears to be little or no proper planning involved.
13. The present problems stem from the disastrous 2017 Local Plan, but there is no justification for continuing the unmitigated growth into the future.

14. If the Council is intent on accommodating the government's housing figures then the only solution is to build a new settlement, properly planned and laid out, with good links to the High Speed railway and to the motorways, of a sufficient size (at least 10,000 houses) to sustain all the necessary local facilities and opportunities for employment, together with well-planned highways and public transport infrastructure. The model would be Poundbury in Dorset. New settlements of this nature can attract millions of pounds worth of government funding - for a good example look at Ebbsfleet.

15. The Council should have commissioned such a study in conjunction with the other authorities in East Kent before preparing the 2017 Plan, but did not. Now it must commission an independent study to see if a suitable site can be identified. If it can not, then again the response to the government should be that the District cannot accommodate such a level of growth.

Policy SS1

1. The provisions set out in Policy SS1 may seem attractive, but are dependent on the (unacceptable) housing growth strategy for Canterbury providing sufficient financial contributions to fund all the infrastructure provision set out in the Plan for the next 20 years. The Policy contains 'promises' that are no more than a "wish list": they are misleading, unrealistic and unaffordable.

2. If the proposed housing development and road building set out in the Local Plan went ahead it would cause unacceptable environmental damage, particularly to the rural surroundings of Canterbury. It would therefore not be in accordance with **Policy SS1**.

Policy SS2

1. These are fine words and aspirations, but clearly unachievable. The Council cannot even look after its existing 'heritage assets' and appears to have no staff with the necessary design or conservation expertise needed for the control of new development. There are no signs that this will change.

2. In recent years, the Council has closed its Heritage Museum; the Castle has been closed for years and its condition is fast deteriorating. The Dane John Gardens and its monuments (fully restored in 1999 at great public expense) are now at severe risk, having suffered 20 years of neglect. The

Mound and monument are on the national **At Risk Register**, but the Council shows no sign of taking suitable action.

3. The Canterbury Tales visitor attraction closed in 2020 and there are no signs that it could ever re-open the City becomes less and less attractive to visitors and tourists.

4. The Council has also failed to deal with the amount of litter and graffiti that have disfigured the city and its environs for the last 20 years and there is nothing in the Plan to suggest that anything will change in the next twenty.

5. The city centre can only be described as “tatty”, with the condition of many of the mediaeval properties showing worrying signs of neglect and the proliferation of wholly unsuitable shop fronts and fascias.

6. If the Council is hoping to win back its visitors and become a tourist destination once again, the draft Plan offers no evidence to suggest how this might be achieved.

Policy SS4

1. The idea that “a new bus-led Transport strategy will ensure people have high-quality sustainable transport options” is all very fine, but who will provide these bus services and who will pay for them? Developers cannot be expected to pay for these services indefinitely: the City and County Councils claim to have no money and Stagecoach have never been in the business of subsidising bus services.

2. The idea of reducing traffic congestion in the city seems laudable enough, but the huge amount of new development proposed in the draft Plan would inevitably make the situation far worse. The reduction in capacity proposed “at some city centre car parks” in **SS4 (b)** would certainly not “reduce congestion on the ring road”, but would only further deter residents and tourists from visiting the city.

3. The expectation that everyone will walk or cycle everywhere in and around the city is clearly untenable. Canterbury is not and never can be a ‘cycling city’: it simply is not flat enough! For a sizeable proportion of the population, cycling is not an option.

4. People will continue to have cars and will expect to be able to use them. Supermarket and bulky goods retailers rely on extensive public car

parking in order to be viable. On-line shopping and food deliveries will only increase the numbers of vehicles accessing new housing developments.

5. The Council has, quite rightly, abandoned the **Canterbury Circulation Plan** and the outrageous plans proposed by the former Council Leader to build wholly destructive new by-passes around the city. However, some of the worst proposals seem to have found their way back into this new Draft. I refer to **clause 2(f)** “Upgrades at the A2 junction at Harbledown and at Rough Common Road.” These are repeated in the new **Policy C12**, and made a condition of the proposed development on “land north of the University of Kent”

6. These proposals would have a completely unacceptable impact on the villages of Harbledown and Rough Common. This was fully set out in the responses to the previous Draft, but clearly the Council has chosen to ignore the views of local residents.

7. The additional slips at the A2 junction would destroy productive orchards and would neither preserve nor enhance the Harbledown Conservation Area or its setting (a statutory test). They would also blight the village for years to come.

8. With the present levels of traffic entering the city from the A2 in the morning rush hour, vehicles back right up the Harbledown By-pass, with the result that drivers try to get round this by driving through Harbledown village – which also snarls up! The additional levels of traffic accessing the city from the west and south would make the situation in Harbledown wholly intolerable.

9. I deal with the “upgrades” to Rough Common Road in my **Objections to Policy C12**.

Policy SS5

1. This Policy sets out the key new infrastructure that would be needed if the Plan were to be adopted.

2. Most of this infrastructure depends on other agencies providing or funding each element, for example Kent Council as Highway, Social Services and Education Authority, the Department of Health or the Water companies. However, there is no evidence in the Plan to suggest that these agencies are committed to any of these proposals, not surprising

given the lack of details, particularly of site availability, timing or availability of funding.

3. It is clear that City Council did not carry out “Due Diligence” in the preparation of the 2017 Local Plan into the adequacy of suitable waste water treatment facilities, which resulted in an **unsustainable** plan. There is no evidence that the Council has remedied that failure in the preparation of the current draft Plan. Evidence of Due Diligence investigations into the deliverability of these infrastructure proposals **must** be made before any credence can be given to the Plan.

4. The Council will, especially, have to produce credible evidence that proposals **2(i)** (waste water treatment) and **2(j)** (a new reservoir at Broad Oak) can be achieved.

Policy R7 Broad Oak Reservoir

1. One of the reasons that the Water Board’s original plan for a reservoir at Broad Oak was turned down was that they could they could never satisfactorily say where the necessary water needed to fill it would come from.

2. The Sarre Penn is not much more than a stream and has an erratic flow. In 2022 it ran totally dry and had no water for several months. With global warming, the situation will only get worse. One possibility put forward in 1978 was that water might be taken from the outfall at Plucks Gutter and piped 18 miles to Broad Oak, but this was rejected as not feasible.

3. In the early 1990s the City Council commissioned a new study from the renowned water engineers Knight Piesold (Ashford). Their conclusion was that the amount of water needed to be abstracted would effectively “kill” the ecology and water environment of the Stour. The City Council should have a copy of the report in its archive. The amount of additional abstraction from the Stour in the last 50 years only serves to show that a new reservoir will never be sustainable. Do not accept the platitudes of the water companies; test them!

Policies C6, C7, C9 and C10

1. Since the “Development Strategy” in SS3 would fail the Tests of Soundness set out in the NPPHF, it follows that the major new housing

sites contained in **Policies C6, C7, C9 and C10** are not acceptable and should be removed from the Plan.

Policy C12

1. The proposal is made for 2,000 new houses on “land north of the University of Kent” – in other words for large areas of The Blean. The Council would have us believe that this would be a new “community” laid out on “Garden City principles.” What nonsense: it would be no more than a vast housing estate in the middle of nowhere. This part of The Blean is not only entirely unspoilt, but also virtually inaccessible. Drainage is notoriously difficult: in the 1980s and 1990s there was a virtual embargo on new development in The Blean
2. Two essential requirements of any new settlement in East Kent are good access to the High Speed railway and the motorways. The Blean has neither.
3. The C12 site is described in the Land Assessment as a “car dependent development” but the “concept masterplan” tries to pull the wool over our eyes by showing large areas of open space, green gaps, green corridors and “opportunities to improve cycling/walking access and safety.” This “concept masterplan” is highly misleading (probably deliberately so) and this applies to the “masterplans” for all the other major development sites proposed in the Plan. The authors of the Plan might think that would fool the general public, but it will not.
4. The areas that would be covered with houses are not shown and only two tiny access points are shown for the major junctions and large network of roads that would be needed, one through Blean Primary School, the other via a Conservation Area which includes the Crab and Winkle cycle route and Grade II listed buildings!
5. The proposal to demolish Blean Primary School, a well-established and well-regarded community school, is simply bizarre. This would have to be replaced with a new school further away from the bulk of its existing catchment area in Blean, Rough Common and Harbledown. This conflicts with Policy SS3, which promises to protect existing community facilities in designated Village Centres – including Blean! This alone demonstrates the foolishness of Policy C12.
6. No account is taken of the damage that would be caused to the natural environment, wildlife and biodiversity and farming or the historic

environment, including Blean Church, scheduled ancient monuments, listed buildings and designated conservation areas. In doing so, Policy C12 would clearly conflict with the Environmental Strategy set out in **Policy SS1**.

7. Slipped into the long list of the requirements that would have to be funded by the new development are **4(f)** “provide an all-movement junction at A2 Harbledown through the provision of additional slip roads” and **4(g)** “Provide highway improvements to Rough Common Road”.

8. No reasoning or justification is provided for these proposals, or why they are necessary for the C12 development to go ahead, nor are any costs or details given, but the outcomes are clear enough.

9. I have dealt with **4(f)** in my Objections to **Policy SS4**.

10. With regard to **4(g)**, this is one of the most destructive and damaging proposals in the Draft Plan.

Rough Common

1. Rough Common Road is the central spine road through the village and almost wholly residential. The purpose of the “improvements” and the construction of new A2 slips at Harbledown appear to be an attempt by the Council to reintroduce the concept of a “western by-pass” to channel all traffic from the west and south of Canterbury heading for the north of the city. This would include not only the new development proposed in Policy C12, but also traffic to and from Whitstable and Blean, the University, Kent College, St Edmunds School, the West Station and St Dunstons – all at the developer’s expense.

2. In the previous draft of the Plan, the purpose of such an “improved” road was quite clearly to serve as a connecting by-pass to a Northern By-pass that would, in the longer term, lead to the development of all the land between Blean and Sturry. No doubt the inclusion of this scheme in the present draft is also intended to cater for further growth “north of the University”.

3. No details are given, but the “improvements” would inevitably involve road widening and loss of car parking, destruction of property and loss of gardens, together with vastly increased traffic at all time of the day and night. Highways engineers are always keen on road building and turning

the road into a dual carriageway would not be out of the question. The village would be virtually destroyed.

4. The authors of the Plan appear to be ignorant of the consequences of such a proposal: it is known as Planning Blight and has not been seen in Canterbury since the 1960s. The proposed “improvements” would blight large numbers of properties for years to come: no one would be able to sell their houses and no one would buy them. If this Plan proceeds, the City Council is likely to face legal action with considerable costs.

5. The Council appears to have accepted ‘lock, stock and barrel’ the “justification” for this development put forward by the University and its advisors. In reality, the only reason for this is to help ‘bail out’ the University which, by its own admission, is in dire financial straits.

6. Nowhere in Policy C12 or anywhere else in the Draft Plan can I find any justification in **planning** terms for this proposal. Policy C12 would clearly conflict with the aims and objectives set out in **Policies SS1, SS3, SS4, SS5 as well as DS1 (Rural Economy), DS 20 (Flood Risk and Sustainable Drainage) and DS26: (Historic Environment and Archaeology) and should be withdrawn forthwith.**

Policy C19

1. The idea of redeveloping the existing Wincheap Commercial Area to provide “the same amount of the existing level of business, commercial and leisure floorspace” and also provide 1000 new dwellings seems both wrong-headed and unachievable. If there is capacity for further development, it should be reserved for business use in line with the Council’s objectives set out in its Corporate Plan.

2. Clause **4(b)** aims to “facilitate the delivery of the Wincheap one-way gyratory scheme”. As was pointed out at the time this first appeared (in the Kentish Gazette) this scheme is completely unworkable, with a bottleneck at the Maiden’s Head junction. Not only that, it would involve taking away on-street car parking in Wincheap, with a devastating impact on retailers and businesses in Wincheap.

Conclusions

1. The draft Plan would clearly fail to achieve the 5 Goals set out in the Council's own Corporate Plan;-

Delivering for our community

Protecting our district for future generations

Feeling safe, secure and healthy

Growing our district sustainably

Listening to our residents

2. In my view, as a professional Town Planner with over 50 years of experience in planning for historic towns, and as a former Planning Inspector, the draft Plan would fail the Tests of Soundness set out in the NPPF that are required in the consideration of any Local Plan. It would not be **justified, effective** or **consistent with national policy** and should be withdrawn forthwith.

Objections submitted by:

J Mansell Jagger MA(Cantab) DipTP MRTPI (Ret'd) IHBC

Director of Planning, Canterbury City Council 1986 – 2000

Former Consultant Planning Inspector

Past President, ICOMOS(UK)

Past Chairman, Canterbury Archaeological Trust