

DRAFT CANTERBURY DISTRICT LOCAL PLAN TO 2045

OBJECTIONS TO POLICIES SS1, SS2, SS3 and SS5, and C1 – C26

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

Policy SS3

1. The development strategy for Canterbury (SS3) is totally wrong. The proposals to make Canterbury the focus for the bulk of the proposed development in the District, and to more than double the size of this small historic town, are wholly unwarranted and unjustified.
2. The Council asserts that, in order to accommodate the Government's required housing numbers, it has considered alternative development strategies. It has dismissed the idea of a new settlement since it cannot identify a suitable site and says that each of the East Kent Districts has decided to accommodate growth within its own boundaries.
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 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 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. The logical response of the Council to the Government's housing figures would have been to tell the Government that they could not be accommodated satisfactorily within the Canterbury District. Perversely, because of the lack of the necessary infrastructure, including highways, water and social and community infrastructure, the Council now proposes thousands more houses than even the Government suggests, in order to fund an "Eastern By-pass". This is both unrealistic and unjustified (**see my Objection to Policy SS4**).

6. 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. From 1987 this was based on best practice guidance put together by the Members of the English Historic Towns Forum (now the Historic Towns and Villages Forum) of which Canterbury was a founding Member and took a leading role.

7. In this period Canterbury had its most prosperous 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.

8. 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 or East Kent and certainly not for Canterbury. The professional experience and expertise in both local planning and conservation built up over many years and highly rated nationally has all been lost.

9. Planning policy for historic towns like Canterbury must be conservation-led.

10. The whole Plan appears to be the ‘vision’ of one man (the Council Leader), who does not even live in the District. The views of the City Councillors who actually represent the City of Canterbury have been effectively by-passed and the views of its residents ignored. The leader’s ‘vision’ has been described by residents as “bizarre”, “nightmarish” and “Dystopian”, all to my mind accurate descriptions.

11. The ‘vision’ appears to involve turning Canterbury into something like an East Kent ‘metropolis’ without any rational or reasoned justification.

12. In my view, 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.

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 25 years. The Policy contains ‘promises’ that are no more than a “wish list”: they are misleading, unrealistic and unfundable.

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, from Harbledown to Sturry. 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 Westgate towers are closed on Saturdays and the Dane John Gardens and its monuments are now at severe risk, having suffered 20 years of neglect.

3. 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 25.

4. 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.

5. 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 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 and

Education Authority, the Department of Health or the Water companies, . However, there is no evidence in the Plan to suggest that these agencies have agreed 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 all 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. (k) (waste water treatment) and (l) (a new reservoir at Broad Oak) can be achieved.

5. Broad Oak Reservoir

One of the reasons that the Water Board’s 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.

6. The Sarre Penn is not much more than a stream and has an erratic flow. Last summer 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.

7. In the early 1990s the City Council commissioned a new study from the renowned water engineers Knight Piesold (Ashford). Their conclusion was that the water source would run dry, effectively “killing” its ecology and water environment. 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.

Policies C1- C26

1. Given the serious objections to the strategic **Policies SS1 – SS5**, it follows that the specific Policies for Canterbury **C1 – C26** are unacceptable and would not pass the Tests of Soundness set out paragraph 35 of the NPPF that are required of any Local Plan

Objections submitted by:

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