

## **DRAFT CANTERBURY DISTRICT LOCAL PLAN TO 2045**

### **OBJECTION TO POLICY SS4**

I wish to object to Policy SS4 in the strongest possible terms.

1. The proposed *Canterbury Circulation Plan (CCP)* is an untested theoretical model dreamed up by an academic based in Paris, which might be used in the construction of a totally new settlement but cannot be applied to an existing historic town like Canterbury.
2. Imposing the Plan on Canterbury would not only cause untold environmental damage to the environs of the city but also result in unacceptable damage to the economy of the city. With its zoning system and threatened fines for using cars, it would also impose quite unwarranted and unacceptable restrictions on the daily lives of residents of the city. It shows an alarming lack of understanding of how Canterbury actually works.
3. Given the Government's and motor industry's commitment to electric and other non-polluting forms of transport, in a few years time air pollution from traffic will no longer be a major issue.
4. The idea of reducing traffic congestion in the city seems laudable enough, but the huge amount of new development proposed in the Local Plan would mean that the *CCP* would not only fail to solve any perceived problems but actually make the situation far worse.
5. The Plan proposes the closure of all city centre car parks and their "relocation to locations outside of the inner ring road." No site-specific proposals are made and the whole idea is clearly unrealistic and unaffordable. Closing the car parks would severely restrict the numbers of shoppers and visitors to the city centre and harm its viability. It is most surprising that the City Council would wish to abandon one of its few substantial sources of income from its (exorbitant) car parking charges.
6. The Plan also envisages the provision of new park and ride sites to serve the 'radial roads' yet the Council cannot even afford to keep all three existing sites in operation
7. The expectation that everyone will walk or cycle everywhere in 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. Supermarket and bulky goods retailers rely on extensive car parking in order to be viable. As for the comprehensive public transport system that would be needed to facilitate the removal of private vehicles, the Plan has no practical suggestions or proposals on how this could be achieved or funded.

8. The idea of building expensive new roads to cater for forecast growth in traffic was abandoned in the 1970s after the physical damage and blight caused to so many historic towns, including Canterbury, by the attempted imposition of a similar theoretical model - the “Buchanan” traffic plans of the 1960s.

9. The draft Plan proposes an “Eastern By-pass” to connect the A28 at Sturry with the A2 at Bridge. The authors of the Plan might believe that a by-pass might help “solve” traffic problems in the city: I can assure them that it would do no such thing. The purpose of a by-pass is to take **through traffic** away from the centres of towns and villages (like the A2 Canterbury By-pass which took the London – Dover traffic out of Canterbury).

10. In contrast, the amount of **through** traffic on the A28 is very small indeed compared with the traffic with a destination **within** the city. The by-pass would serve very little purpose and never pass any cost/benefit analysis. It would have no effect on traffic in the city and would never be funded by the County Council, which is why the Local Plan now proposes building thousands more houses than even the Government wants. The latest idea to force all traffic to go round the city and call it an “Eastern Movement Corridor” appears to be a last-ditch attempt to justify this costly and unnecessary road.

11. The whole traffic plan appears to be scheduled to take place, bit by bit, if funding is available from new development, over the next 25 years. The estimated costs included in the Local Plan are huge and do not take into account future inflation: apart from contributions from continuing to build thousands more houses, there appears to be no idea where the funds would come from.

12. There is also the clear long-term intention (Policy **C26**) of carrying on to develop the whole of the area to the north of the city, from the University to Sturry, with an equally costly and environmentally damaging northern by-pass, in the following 25 years.

**13. More specifically, the *Canterbury Circulation Plan* would have a completely unacceptable impact on the villages of Harbledown and Rough Common (see Policy SS4 2(g) (i) and (iii)).**

14. With the “zoning” plan in place, the *Circulation Plan* envisages that **all traffic** from the west, south and east of the city heading to the north of the city will be forced to use the “Eastern Movement Corridor” road and the A2 via an “upgraded” A2 junction at Harbledown and an “upgraded” Rough Common Road. This would include all traffic heading to and from Whitstable and Blean, the University, Kent College, St Edmunds School, the West Station and St Dunstons. No reasoning or justification is provided, nor any details given, but the outcomes are clear enough.

15. Any new junction at Harbledown would destroy productive orchards and neither preserve or enhance the Harbledown Conservation Area or its setting. It would also blight the village for years to come. In the light of other proposals in the traffic plan it would inevitably raise again the idea of a Park and Ride site at Harbledown. Prior to the Inquiry into the 2017 Local Plan, the Council withdrew its proposal for a Park and Ride and accepted that no suitable site could be found in Harbledown.

**16. Perhaps the most destructive and damaging proposal in the whole draft Local Plan is that to “upgrade” Rough Common Road and use it as an integral part of the envisaged “outer ring road”.** Rough Common Road is the central spine road through the village and almost wholly residential. The “upgrading” would inevitably involve road widening and loss of car parking, destruction of property and loss of gardens, together with vastly increased traffic at all times of the day and night. The village would be virtually destroyed.

17. The proposal 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. This sort of blight has not been seen in the District for more than 50 years. No one with any concern for the residents of the District could possibly dream up such a horrific plan. If this plan proceeds, the City Council is likely to face legal action with considerable costs.

18. The draft development strategy and traffic plan for Canterbury is the most unwelcome and damaging plan for an historic town that I have seen in 50 years: if accepted it would blight significant areas to the east, south and west of the city.

19. The Plan appears to be the ‘vision’ of one man (the Leader of the Council): critics have described it as “bizarre”, “nightmarish” and “dystopian”, which to my mind are accurate descriptions. There appears to have been no planning input from any experienced planning professional.

20. That the County Council, as Highway Authority, appears to be complicit in these plans shows an equal level of professional incompetence.

### **Conclusion**

21. The draft Plan is unsustainable, unjustified and undeliverable. It fails the tests of soundness set out in the National Planning Policy Framework (NPPF). It should be withdrawn forthwith and a fresh start made, this time with expert and experienced professional planning guidance.

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