

# Draft Canterbury Local Plan to 2045

## Comments and objections of Clive Bowley 15 January 2023

### Part One - General Comments:

#### Consultation engagement topic

##### Engagement with the public

Despite the document celebrating the extent of consultation at this stage, there has actually been little meaningful engagement with the general public. Only a few people visit the council's news website and the 4 no. Drop- in consultation meetings held by the council were low-key affairs with poor quality, unclear and opaque graphics - and these were these were only really attended by those in the know about them.

More effective was the coverage in the Kentish Gazette, although this newspaper now has a fairly limited readership.

The various civic amenity societies, including the Canterbury society and Whitstable society have run more effective consultation exercises, open to all their members but again the membership of these local societies is very limited.

The City Council had not produced any clear, simple understandable graphic displays explaining what the local plan involves and seems to have made limited attempts to engage with the wider population. At the very least one would have expected some sort of travelling exhibition – this setting up at local supermarkets or similar places where the general public congregate. Only in this way could the wider population have been involved in the local plan process in a meaningful way. So far they have not been.

##### Presentation materials

It seems to me that the documentation produced by the Council is inadequate. The interactive map is completely impenetrable to anyone who is not practised in dealing with online mapping and the graphic presentation isn't clear. The mapping is also misleading, since it fails to show the existing consents coming out of the 2017 plan.

However, these maps do at least show the large areas of land take planned for the new 'movement corridors' on the south-west and east side of the city but then fails to show any land take for the Western route north from Harbledown along Rough Common Road nor for the missing northern link, the route of which is left hanging in the air!

On such an important matter, as this, the council should have at least produced a series of "popular" leaflets with simple graphics and maps explaining the key aspects of the plan.

These, including:

- housing sites
- employment sites
- schools, roads,
- public open space
- roads
- Canterbury traffic management plan

But this did not happen!

The Kentish Gazette did, however, produce two maps showing Canterbury housing sites and the traffic plan with clear, simple, understandable graphics – but the council have produced nothing of this nature.

**Comment: In general terms, although the council has carried out a number of consultations, the effectiveness of these in reaching the more general public has been limited and given the lack of involvement, one would suggest that the current draft local plan fails the test of being adequately consulted about with the local population**

### **The general thrust of the plan**

This chooses Canterbury as the main focus for growth, despite it being an historic city and despite its existing urban areas being constrained by countryside of high landscape value, and especially to the S and W and with some of it within the AONB. The planned growth at Whitstable and, especially, Herne Bay, is much less, despite the lesser constraints and the less sensitive nature of these places.

To compound this, the areas of anticipated growth are all shown mainly on the south side of the city, on the side that has the highest landscape value, despite the fact that the land to the north of the city's both of less agricultural value and of far lower landscape value.

This also despite the fact that the favoured '*growth-plus*' option was clearly objected to in previous rounds of public consultation (14% in favour, 69% against)

Much has been written by others about the craziness of the government's housing algorithm. This appears to be a scientific fabrication which seems to operate like this:

"First take the actual, real, need for extra housing in the area and then multiply this by an adjustment factor of 1.55. This being based on the market cost of housing locally.

The council is then chosen to further increase the housing numbers above this, so as to provide the finance to construct the transport proposals contained in the plan

**Comment: Canterbury has high house prices because it is a nice place to live in - and so it is being punished for being so! The result of the algorithm is to condemn the city to such excessive growth that it would no longer be an attractive place to live! Then the Council seeks to pile on even more growth on top of this, in order to generate the extra developer contributions to build bypasses that are only required as the result of the growth being proposed! The whole process is bonkers and it seems that even the Secretary of State - Michael Gove is of the same opinion and has recently suspended the government's requirement for councils to follow the algorithm. Canterbury City Council should take the hint and withdraw the current plan proposals for growth and posit new housing targets that relate to what is actually required locally.**

## **Part Two: specific Comments on the local plan document**

### **The Vision for the district – strategic objectives.**

#### **1. The Spatial strategy for the district**

Like motherhood and apple pie, this section is full of worthy intentions and statements with which, few could disagree. However upon closer consideration, the content of these statements seems to

be generally meaningless and the aspirations not backed up by the substance of the plan, which is very much biased in favour of the growth of the district

## **Policy SS2 - sustainable design**

### **Section 1 – Heritage Assets.**

This seeks to protect the World Heritage site, but here, the Council's past record in planning is extremely poor, with the Slatters hotel development already compromising the setting of and the Mountfield development set to deal a mortal blow to the setting of the cathedral as seen from the University slopes. The current plan proposes yet more development on exposed sites along the Stour Valley sides and these can only further harm the setting of the world Heritage site.

No mention is made at all of the rest of the heritage assets of the district – the 3000+ listed buildings (1500 in Canterbury) and the 90+ conservation areas which together contribute to the high environmental quality of the Canterbury district. What are the plan proposals to preserve and enhance these areas? It seems there are none?

**Comment: The plan needs to be amended to incorporate policies that seek to protect, preserve and enhance the districts listed buildings and conservation areas**

### **Section 3 - Responsiveness to distinctive local character**

What does this actually mean – especially when qualified by the words “*while incorporating appropriate innovation or change, such as in scale, form and density, and creating inspiring new buildings and places*”? This is a meaningless statement that could be used to justify just about anything that is proposed within the district regardless of its design, scale and bulk.

**Comment: This particular qualification needs to be deleted from this policy**

### **Section 4 seeks “sustainable, complete and compact neighbourhoods”.**

However, this is simply impossible to achieve in the sort of suburban developments proposed in the plan, on sites which are distant from the city centre and connected by an extensive programme of new roadbuilding.

**Comment: The currently proposed land – hungry pattern of development around the city needs to be completely reassessed – with any new proposals developments designed with a much more dense urban character than has been achieved in the past**

Policy SS4 that the council would provide “(b) *The delivery of a comprehensive city-wide network of segregated cycle lanes and cycle parking infrastructure, with links to the coast and rural areas*”.

**Comment: There are no actual proposals for an organised system of cycle routes, either connecting the city centre or communicating around the suburbs are shown. Simply putting orange arrows (indicating “opportunities for new cycling/walking connections”) on the site development master plans is no substitute for a comprehensive cycle route network, which is what is actually needed.**

Many of the sites are located in places where cycle routes to the city centre would involve negotiating long slopes back out of the city centre which would discourage cycle use and the fundamental expansionist layout of the plan means that it is not sustainable.

**Comment: The local plan document should include the schematic layout of a strategic plan for cycling, not just talk about it**

In addition, the past record of development around the city is very poor – with all of the recent housing developments following the tired old pattern of low density – car focused suburban housing estates. The current set-up of the design standards for residential areas in Kent means that it is impossible to build really compact urban settlements of the sort that would effectively limit urban sprawl and reduce the loss of countryside.

**Comment: the Local Plan needs to include a statement seeking to ensure that new development should take the form of dense urban settlements – not simply follow the current lower density standards set by the Kent design guide**

**Section 7 Delivery of “High quality, accessible open space”.**

Section C (c) “*food growing opportunities*” and (d) “*natural and semi-natural green spaces connecting communities to nature*”

These are objectives that are, in reality, impossible to achieve in the sort of suburban developments that are offered up by the volume housebuilders. In addition, the various more detailed concept masterplans for the various development sites show the green areas of the sites split up into thin strips of green all around the perimeter of the development blocks and separating between them – as such, none of these areas of “open space/landscape buffers” will have any biodiversity or wildlife conservation value and will inevitably end up as miserable abused spaces.

**Comment: the currently proposed site development strategies need to be redesigned to avoid broken up areas of green within the various development sites and, in addition, an overall open space landscape strategy needs to be produced across the city area for the various sites that end up being developed.**

**Comment: In summary, I strongly object to the policies contained in SS 2, and suggest that the council needs to revisit these and reconsider both the primary growth objectives of the plan and the manner in which those sites which do need to be developed are developed in a way such that there is the minimum take of new land.**

**Policy SS3 development strategy for the district.**

This chooses Canterbury as the main focus for growth despite it being an historic city and with its existing urban areas constrained by countryside of high value and some of it within the AONB – especially to the S and W.

Despite this – the areas of anticipated growth are all shown mainly on the south side of the city, despite the fact that the land to the north of the city’s both of less agricultural value and of far lower landscape value.

This also despite the fact that the favoured ‘growth plus’ option was clearly objected to in previous rounds of public consultation (14% in favour, 69% against)

Much has been written by others about the craziness of the government’s housing algorithm stop this is a scientific fabrication which seems to operate like this:

Let’s take the actual, real need correction housing in the area and then multiply this by an adjustment factor of 1.55. This being based on the market cost of housing locally.

Canterbury has high house prices because it is a nice place to live in. And so it is being punished for being so. The result of the algorithm, is to condemn the city to such excessive growth that it would no longer be an attractive place to live and then the council seeks to put even more growth

on top of this, to create the extra finance to build bypasses that are only requires a result of the gross being proposed. The whole process is bonkers and it seems that even Secretary of State - Michael Gove, the same opinion and has suspended the government's requirement to follow the algorithm. Canterbury City Council should take the hint and withdraw the current plan proposals for growth and posit new housing targets that relate to what is actually required locally

**Comment: the current local plan proposals need to be withdrawn and reconsidered from first principles, this due, partly, to the Secretary of State's recent actions in removing the requirement to follow the government algorithms.**

**Comment: The 'growth plus option' needs to be abandoned in favour of a housing provision that seeks only to meet the actual local demand for additional houses through the plan. And is balanced against the environmental constraints of the heritage city**

## **Policy SS4 - Movement and transportation strategy for the district**

The plan proposes convoluted new by pass routes on the south-west and eastern sides of the city. What is proposed is a massive roadbuilding programme which will severely impact on the setting of the city. The impact of these roads alignments are misleadingly represented on the proposals, maps as thin dotted lines, bare as in reality, the construction of these roads will involve massive earthworks which will devastate the areas through which they pass. The interactive map does at least show the road alignments as wide swathes of land, but the land take for roads should also be shown on the proposals, maps for the various parts of the city.

In addition, there seems to be no realistic study of how the road lines proposed would interact with the physical landscape, which in various places has a hilly and rolling form which will necessarily require massive earthworks so as to achieve the gradients levels and junctions of modern road design.

**Comment: at this stage all the road schemes need to be studied in more detail so that their impact on the landscape can be more realistically assessed and better understood prior to any decisions being taken over the preferred highway strategy**

In particular, the proposals for the south-west quadrant of the city are particularly hard to understand - with a curious convoluted route which seems unrealistic and unworkable. In particular, the proposed road alignments will obliterate the ancient hollow way at Hollow Lane, which will be completely obliterated by the proposals to develop the land, both north-east and south-west of the A2 bypass. This feature is of great antiquity, but the implications of the scheme on it are not discussed at all. The destruction of this ancient hollow way whose origins date back to Anglo-Saxon time, and may possibly be Roman, is unacceptable and I suggest that proposals for this part of the city outskirts need to be completely reassessed.

The same applies at Harbledown where the steep landforms at Palmer's Cross Hill will inevitably result in massive earthworks, these needed to accommodate the gradients for the road leading up into Rough Common Road and facilitating the full access junction with the A2. None of this is shown on the proposals map, nor is there any indication of the impact of converting Rough Common Road into a main distributor road, part of what will eventually become the northern outer ring-road. Again, the eventual impact on the Rough Common community will be devastating and it is dishonest to propose these routes without first demonstrating and evaluating the physical impact of the road construction on the landscape and the village.

Comment: in particular, a detailed sketch scheme needs to be prepared now showing the actual highway works required to convert Rough Common Road into part of the northern ring-road, before any decisions are taken on the movement strategy contained in policy SS.4 or on any other aspects of the local plan

Comment: the damaging impact of the road schemes to the West and North of the city, at Hollow Lane and Rough Common Road in particular will inevitably cause huge environmental damage to these areas to the point where the proposals become unacceptable.

## Canterbury city centre vision

**Nb.** The comments in this section are of a more detailed, site specific nature

The Council's vision statement is a chapter with fine words with which no one would disagree. However, during the last 20 years, the Council has signally failed to achieve any of these objectives

## Canterbury city centre map.-(p20) – *comments*

For a map that is intended to serve the city through to 2045, the vision is in fact very limited – merely identifying site-based current opportunities that are all already known about and imminent. It fails to propose any wider objectives to improve the city beyond these. There is no vision!

The Plan needs to differentiate between opportunity sites for development and those that can really only offer opportunities for environmental enhancement. For instance- this it may well be possible to achieve enhancement of the Queningate car park area (8 on the map) but it is clearly not a site for building anything on. The same applies to site 9 (North Lane). These 2 categories need to be separated.

Some of the proposed development/regeneration/open space opportunity sites and areas are problematic in particular, and I comment as follows:

- Site 5 - Pound Lane car park - where any form of intensive development would be extremely damaging to the amenity of the housing surrounding the site – and would lead to damage to the environment quality of the area.  
**Comment: this site should be removed from the list of sites suitable for building development**
- Site8 - Queningate car park - where its location immediately outside the city wall precludes any form of built development. In addition, the removal of the car park here would effectively stifle the ability of the cathedral to function in any meaningful way.
- **Comment: this site needs to be identified as a site only for environmental enhancement – not for any form of development**
- Site 9 – North Lane car park - again the location here by the river and Westgate precludes any form of built development. The area could be usefully landscaped as a Riverside Park but this is not clear from the proposals, mapping and unlikely to happen.
- **Comment: this site needs to be identified as a site only for environmental enhancement – not for any form of development**
- Site 11 Burgate Ln/Canterbury Lane. There is scope for development here, but the focus should be on Iron Bar Lane where the existing service area and low density buildings positively detract from the character of the city centre and are underused. There seems little

scope for development in Canterbury Lane – except perhaps for the toilet on the corner of the car park – a single building plot here.

- **Comment: this site description needs to be changed to omit Canterbury Lane, but include Iron Bar Lane and the service yard**

Some of the “heritage enhancement opportunities” sites are also problematic.

- Only the castle actually needs “enhancement”.
- The only thing that Dane John needs is to be properly maintained on an ongoing basis. There is no need here for a local plan policy. Indeed, the current tendency to exploit the park for events is damaging its essential character and harming the amenity of residents that live around it. This ambition to manage the place as an event space needs to be reined back.  
**Comment: this site needs to be identified only as an open space requiring proper maintenance, but intensification of the use for events needs to be discouraged**
- The levelling up bid for the Westgate within area is also deeply troubling as current proposals still envisage the building over of the Holy Cross churchyard site – this would represent a he/she damaging the proposal that would only diminish the quality of this locality of the city.
- **Comment: the future of this site needs to be described in more details before any sort of designation is applied to it**

In addition, there is a complete absence of any conservation-based proposals for enhancing and restoring the character of the city centre. Projects here might well include;

- The reconstruction of the historic form of long port as a long rectangular market place by the removal of the roundabout from its eastern end and by developing the long port coach park (this not appearing as a *development/regeneration/open space opportunity site*).
- The opening up of the historic entrance into the Cheker of the Hope pilgrim’s inn yard. This currently miserable slum of a place could become a major attraction to the city, restoring an historic feature that was lost following the fire of 1869 and providing an attractive way into and opening up the area of land previously occupied by Debenhams
- Restoration of Burgate Lane to its tight mediaeval form. Thus the charming character of the street as it was before it was destroyed by the city planners in the 1970s.
- The restoration of the tight enclosed feel of Iron Bar Lane to its pre-war character – perhaps incorporating a marketplace in the iron bar Lane service area currently an unattractive and unloved service area
- Restoration of the missing street frontages in Northgate – these opposite Union Street and at the Northgate car park. These both open areas ruined by demolition by the city council in the 1960s
- The restoration of the historic street plan at the corner of Orchard Street with St Dunstan’s Street (widened by the city planners in the 1960s) by extending the Cost cutter store with buildings hard up to the corner. Current proposals for the site are hideous and will not enhance the character of the area.
- Restoration of the gap site in Castle Street at St John’s Lane by redevelopment to restore the continuous built frontage here.
- The construction of development at the corner of Peter Street with St Peter’s Place to remove the wide open space caused by demolition for the never – built ring road and the



formation of a public square in the space contained by the Westgate, Holy Cross Church, and former Barretts showrooms.

## **Policy C1 Canterbury city centre strategies – comments**

1) - Revitalise the city centre - this is a worthy statement encouraging sensitive mixed-use regeneration, but the councils record so far is very poor, with all of the recent city centre development scheme permitted allowed to be vastly over-scaled and with architecture, not responding to the local character.

**Comment: the Council needs to adopt a more stringent and sensitive approach to future proposals for development in the old city.**

2) - Primary shopping area - The concentration on retaining the city as a sub-regional shopping destination is an outdated set. Traditional shopping is withering away and the opportunity needs to be taken to restore the town centre to become a more liveable balanced community.

**Comment: the Council needs to reconsider its stance, encouraging a more balanced approach to city centre uses with less stress on the use of the city for retail sales as a sub – regional hub**

6) – St Georges Place –

**Comment: a welcome development –but see concerns about the criteria for development of this site (see below)**

7) – positive approach to the city centre’s growth - The continuing insistence on supporting the night-time economy is very much at odds with the wider objective to transform the town centre into a more attractive, pleasant, liveable city. Currently, the character of the city and night is unpleasant, threatening and not worthy of the city’s role as the “*mother city of the Anglican faith.*”

**Comment: the Council needs to re-phrase this paragraph removing the implicit bias in favour of the night-time economy.**

8) - Protect, enhance and capitalise on the World Heritage Site - A worthy objective. How is this to be done? The cathedral has broken the link between the 3 parts of the world Heritage site by closing the Queningate to public access. And that a wider level, the city completely fails to exploit its religious connections. This, unlike other European religious centres such as Santiago de Compostella and Seville. The religious dimension to the city tourism is currently totally ignored and it is this aspect of the city needs to be regained in the way it was in the 1930’s.

**Comment: the Council needs to completely re-phrase this paragraph so as to take account the need to encourage the religious dimension of the city’s tourism**

9) - Shopfronts – again a welcome objective, but the existing city centre cannot always provide “Well-designed storage space for refuse and recycling, and adequate access for servicing”. It is the essence of the place and the most important thing is that new development follows the forms and typology of the existing town centre.

**Comment: the Council needs to re-phrase this paragraph to better emphasise the need for shopfronts to respect the local character**

12) - Public realm improvements. The reference to “Opportunities to provide for attractions, public art and events will be sought, such as at Dane John Gardens” is very worrying. As stated above, the Dane John is currently being overexploited. This ruining both its physical fabric and the amenity of the surrounding residents. This “sweating of the councils assets” needs to be reined back to allow



the Dane John to regain its calm character as a Victorian park. Policy C1-12 is suggesting the opposite.

**Comment: the Council needs to re-phrase this paragraph so as to reduce the emphasis on opportunities to provide for attractions and events at the Dane John**

## **Canterbury City Centre Allocations –Detailed Comments**

### **Policy C2 Canterbury - 43 to 45 St George’s Place**

The redevelopment of the old ABC cinema site has to be welcome, but the intensity of the numbers of dwellings and other accommodation proposed will inevitably mean that the redevelopment of this site will be over-scaled, ugly and harmful to the character of the surrounding streets. This site does not need a landmark building – the proposed development should sit quietly in context with and be in scale with the surrounding buildings.

**Comment: the Council needs to re visit the brief for this site and reduce the suggested development mix to a more realistic expectation of the amounts consistent with achieving a redevelopment consistent with the townscape of the area**

If the transport plan means that St Georges roundabout will no longer be needed, then the opportunity should be grasped to restore the topography of this area as it was before the ring road was punched through it, with the roundabout and underpasses removed. This means not only creating a larger development site, reinstating the original corners between Georges place and Upper Bridge Street, but also offering the opportunity of a second development site opposite at the corner with Lower Bridge Street.

**Comment: the Council needs to consider the possibility of removing George’s roundabout so as to enable the reconstruction of the frontages on both sides of St George’s Place – so as to release valuable extra development land**

### **Policy C3 Canterbury city centre regeneration opportunity areas**

Some of the sites listed are unsuitable for any form of built development. These, including sites

- 5. Pound Lane car park;
- 8. Queningate car park;
- 9. North Lane car park;

The other sites all need to be developed at a less intensive scale than has been demonstrated recently by permissions granted at Debenhams; Nasons, and Northgate, where the current scheme proposals are grossly out of scale with the surrounding townscape

**Comment: the Council needs to subdivide the sites listed into those suitable for development and those suitable only for landscape enhancement. Sites 5, 8 and 9 should be included in the landscape enhancement only category.**

### **Policy C4 Canterbury strategic development areas**

Pages 25 – 79 shows in more detail the development of mostly housing sites around the city.

2.4 states that the strategy for Canterbury is to “consolidate growth on the southern side of the city, to build on and integrate with planned growth at the 2017 strategic sites at South Canterbury and Cockerling Farm”.

The section contains a series of map plans showing how all the sites will be developed – mostly for housing and with the “movement corridors”, shown as innocent-looking thin dotted lines meandering around the south west and east of the city.

The fundamental problem with all of these plans is that they fail to represent the extent of physical destruction represented by the proposals for all these areas and the plans fail to assess the physical and visual impact of the development of them on both the local topography and the wider setting of the city.

There has been no consideration or assessment of the landform of these areas and the fact that the southern side of the city is the area of highest landscape value and of grade 1 agricultural quality seems to have been disregarded in the enthusiasm to seize areas of development land to support the expansionist thrust of the local plan.

The city council has, in the past, shown a lamentable disregard for the impact of development on the setting of the city and the wider character of the Stour Valley, and in particular, the 2017 allocation at Mountfield Park will cause irreparable harm to the setting of the cathedral as seen from across the city from the northern slopes.

At Sturry, the development up the valley sides north of the village will devastate the setting of this historic village, and further urbanise the character of the Stour Valley in an unacceptable way.

Both of these developments have yet to be constructed and only then will the full devastating impact that schemes will have be fully appreciated - although the earth moving works at Thanington and further out at Milton provides a foretaste of the destructive impact of the impending changes represented by the plan proposals which envisage changes to the setting of the City on a geological scale.

There seems to have been no evaluation of the physical impact of any of the plan proposals, either the development sites or the road scheme in any of the documents provided.

Some of these development sites are in the most sensitive rural areas with rolling landform and a rural landscape with the physical topography of the area – fields, roads and boundaries having their origins in the Middle Ages, and thus of tremendous historic importance.

Development of any of these sites will devastate the character of these places, erasing their historical forms from the landscape and replacing them with functional engineered replacement landscape of nil cultural value

Some of the sites, particularly in south-west Canterbury will impact on the setting of the city and the rural character of the Stour Valley. No assessment has been made of the physical impact of either the development sites or the planned road layout

In Canterbury, the most disastrous of these will be in south-west Canterbury where the rolling and rising landforms in the Stuppington Lane area (W of the hospital, Chaucer hospital and Boys Langton) is particularly sensitive and attractive and development of this area will certainly partly impact on the valley setting of the city. Other allocations between the Nackington and Old Dover Roads and at Bekebourne Lane perhaps less so!

But where are the landscape impact assessments? These are essential! There has also been no assessment of the cultural and historic significance of any of the development sites. Again, this needs to be done before the allocations are made.

Comment: notwithstanding the need to fundamentally address the thrust of the local plan, the Council needs to carry out detailed physical evaluations of all the sites required for either house building, commercial development or road schemes, at this stage, so as to inform, and prior to decisions being made about the direction and allocations of the local plan

Comments and objections of:

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Local resident

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