

CANTERBURY LOCAL PLAN CONSULTATION 2025

COMMENTS AND OBJECTIONS

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[REDACTED]

SECTION 1

Development Strategy

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. 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 the National Planning Policy Framework (NPPF).
5. The Introduction to the Consultation makes it clear (para.1.32) that “Local Plans should make sufficient provision for the infrastructure needed to support planned growth including education, transport, health, community and utilities infrastructure.”
6. The Council then admits that it does not have an Infrastructure Delivery Plan and even has to ask the District’s residents “if you have any specific suggestions about how the Local Plan could ensure improvements to water infrastructure” including both waste water treatment and fresh water supply (para.1.37).

7. The Council should also be aware from previous Inquiries and studies that the amount of water needed to fill a reservoir at Broad Oak would simply result in the death of the river Stour as an ecological resource.

8. The Council also admits (para. 3.8) that it does not have an up to date District Transport Strategy.

9. 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 clear idea of how and when the necessary infrastructure can be provided. Without it, the ‘Strategic Development Areas’ cannot be justified. There appears to be a lack of understanding of even the basic principles of Town Planning.

10. Evidence of **Due Diligence** investigations into the deliverability of **all** the necessary infrastructure must be made first. Without a clear demonstration that all the necessary infrastructure can be financed and delivered in an acceptable timescale, the development strategy is **unsustainable** and would not pass the **Tests of Soundness** set out in Government guidance.

11. If the Council wants to meet the Government’s housing figures, the only possible solution would be for a properly planned new settlement, with good links to the High Speed railway and the motorway network. Since the abandonment of County Structure Plans, there has been no strategic planning in Kent and certainly not for East Kent or Canterbury.

12. **The Duty to Co-operate:** District Councils are required by the Government to co-operate with each other in producing local plans, but there is little evidence that Canterbury has done so and the Local Plan would fail on that count.

13. The Council admits that it cannot find a suitable site in the Canterbury District. In reality, the Council now has no alternative but to tell the Government that it cannot accommodate this level of growth and call a halt to the preparation of this local plan.

14. 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 C12

15. The proposal to withdraw the allocation of 2,000 new houses on “land north of the University of Kent” – in other words for large areas of The Blean - is to be welcomed and supported. This development should never have been put forward in the first place.

16. Will the Council now confirm that all the infrastructure and other requirements in Policy C12, including **4(f)** relating to provision of “an all-movement junction at A2 Harbledown” and **4(g)** “highway improvements to Rough Common Road”, will also now be removed from the Plan?

South West Canterbury Strategic Development Area

17. The loss of this of this large area of productive farmland and valued countryside would fundamentally conflict with the **Environmental Protection Policies** of the Local Plan.

18. The ‘Concept Masterplan’ again demonstrates the authors’ lack of any practical planning experience. In showing large areas for ‘green corridors’ and ‘open space /biodiversity opportunities’ it tries to pull the wool over our eyes to mask the fact that in truth it would simply be a number of large housing estates plonked down with no sense of community and, worryingly, no proper access.

19. The deletion of the highway slips from the A2 mean that there would be no suitable highway access to this land. The Plan seems to envisage a future where everyone walks, cycles or gets the bus and no one has cars. This is patent nonsense. A huge number of vehicle movements would be generated by this development, whether by private cars or service and delivery vehicles. The provision of “primary vehicle access from Hollow Lane and secondary vehicle access from Nackington Road” (**4(d)**), with “upgrades to Hollow Lane, Lime kiln Road, Stuppington Lane, South Canterbury Road and Nunnery Fields” is completely unworkable and damaging.

20. These proposals appear not to have been subject to proper scrutiny by someone with a practical knowledge of transport planning or highways management.

21. The proposal to destroy the Thanington Recreation Ground – a much valued asset and one of the few green community facilities in the area –

simply beggars belief. It would clearly conflict with the Council's own Goals set out in its *Corporate Plan* (see **Conclusions** at the end of this submission).

22. Since the growth strategy for Canterbury (**Policy SS3**) is unsustainable, it follows that this development area is unacceptable in principle and should be withdrawn.

East Canterbury Strategic Development Area

23. The loss of this large area of productive farmland and valued countryside would fundamentally conflict with the **Environmental Protection Policies** of the Local Plan. This is a rural, not an urban, area and the proposals would destroy the village of Bekesbourne.

24. The objections set out in **para.18** above apply equally to this development area.

25. Again, the authors attempt to play down the amount of traffic that would be generated by this huge development. Littlebourne Road is simply not capable of dealing with this increased traffic.

26. Where does the idea of a new Park and Ride site come from? It would not be used by locals but would be aimed at attracting more traffic from outside the District, adding to the unacceptable traffic levels on Littlebourne Road and certainly not reducing congestion in the City centre.

27. Without a proper Transport and Traffic Assessment, this proposal is a non-starter.

28. Since the growth Strategy for Canterbury (**Policy SS3**) is unsustainable, it follows that this development area is unacceptable in principle and should be withdrawn.

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:

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