

DRAFT CANTERBURY DISTRICT LOCAL PLAN 2040

OBJECTIONS TO THE SPATIAL STRATEGY FOR THE DISTRICT

OBJECTIONS TO POLICIES CS1, C9, C10, 11, C15, C16, C18 AND DS9

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

THE CANTERBURY ‘VISION’

1. Whoever wrote this ‘Vision’ was wearing a very large pair of rose-tinted spectacles: it bears little resemblance to reality. The Council seems bent on turning Canterbury into some sort of theme park, with ‘events’ and ‘stories’ to attract visitors. Yet it cannot even look after its existing heritage assets and appears to have no staff with the necessary design or conservation expertise for maintaining its historic buildings or for the control of new development.

2. 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. Several council-owned attractions have been closed for years. The only reason why tourists might want to visit Canterbury now is to visit the Cathedral and possibly St Augustine’s Abbey.

THE SPATIAL STRATEGY FOR THE DISTRICT

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

4. 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 10,000 new houses in addition to the 13,000 thousand already committed, but not yet built, from the 2017 Local Plan. The bulk of this growth is centred on Canterbury, but such huge growth of a small historic town is completely unsustainable.

5. The Government's housing growth figures are without any rational foundation and bear no relation to the need for new housing in the district, nor of the capacity within the district to sustain such growth. Where are the jobs for this new population? The retail sector is fast declining and shows no sign of resurgence. The universities are in serious financial trouble and are likely to contract significantly in the next few years. Canterbury is not a manufacturing town.

6. No doubt some owners might 'work from home', but the only sensible conclusion is that these thousands of new homes are aimed at London commuters moving out of London to buy cheaper houses but still relying on commuting by rail back to London for work. This is not a sustainable strategy.

7. The Council fears that if it cannot meet the Government's targets it would have little or no control over new residential development that might be proposed for sites that it would not want to see developed.

8. However, the Government's Planning Policy says that any new development would have to be "**sustainable**". The Council's officers seem not to understand the meaning of this word and, in trying to meet the Government's targets, the Council continues to put forward a Spatial Strategy that is itself wholly **unsustainable**.

9. 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 wastewater treatment provision and its highly damaging effect on the Stodmarsh Nature Reserve and the Stour catchment area.

10. 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 wastewater treatment facilities*" but fails to provide any details or convincing evidence that such facilities will be provided in the lifetime of the Plan.

11. The only possible way to accommodate the Government's housing figures would have been to look for a new settlement, well related to both the motorway and rail network and capable of providing all the necessary social, educational and community infrastructure. Poundbury in Dorset would provide a useful model. This should have been done in partnership

with the other East Kent Districts also struggling with unsustainable growth. Clearly, the ‘Duty to Collaborate’ has not been met.

12. Because of the lack of the necessary infrastructure, including highways, waste water and social, educational and community infrastructure, and in the absence of a suitable identified site for a substantial, sustainable new settlement in East Kent, the logical response of the Council to the Government’s housing figures would have been to tell the Government that the “required” growth could not be accommodated satisfactorily within the Canterbury District.

13. 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.

14. 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.

15. 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.

16. Planning policy for historic towns like Canterbury must be conservation-led and development must be strictly controlled.

17. The “Spatial Strategy”, particularly for Canterbury, appears to be little more than plonking down huge housing estates on land put forward by developers and then blaming the government. There appears to be little or no proper planning involved. The lack of qualified and experienced planning guidance has been demonstrated in all the recent iterations of this ‘Local Plan’.

18. The present problems stem from the disastrous 2017 Local Plan, but there is no justification for continuing the unmitigated growth into the future.

19. The Strategy sets out the key new infrastructure that would be needed if the Plan were to be adopted. Most of this infrastructure depends on other agencies providing or funding each element, for example Kent County 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 will be able to fulfil these requirements. Nor is there any evidence that the bus companies (Stagecoach and others) will be able to provide the extensive services upon which the Transport Strategy is based.

20. It is clear that the City Council did not carry out “**Due Diligence**” in the preparation of the 2017 Local Plan into the adequacy of suitable wastewater 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, nor for the provision of drinking water. 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.

21. The Council will, especially, need to produce credible evidence that proposals for wastewater treatment and a new reservoir at Broad Oak can be achieved.

Broad Oak Reservoir (Site R24)

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

23. The proposed reservoir would have to rely on abstracting water from existing watercourses. The Sarre Penn is not much more than a stream and has an erratic flow. In recent years it has run totally dry and had no water for several months. With global warming, the situation will only get worse. One possibility put forward in 1978 (and now again) was that water might be taken from the River Stour outfall at Plucks Gutter and piped 18 miles to Broad Oak, but this was rejected as not feasible.

24. In the early 1990s the City Council commissioned a new study from the renowned international water engineers Knight Piesold (Ashford). Their conclusion was that even if sufficient water **could** be abstracted from the Stour, the result would effectively “kill” its ecology and water

environment. The City Council should have a copy of the report in its archive.

25. The huge amount of additional licensed abstraction from the Stour in the last 40 years will have severely reduced the amount of water available and means that a new reservoir will never be sustainable. The water company has not demonstrated that a new reservoir can be constructed at Broad Oak without unacceptable environmental damage.

26. In the past few months, the responsible authority, South East Water, has not been able to provide drinking water to several parts of Kent and Sussex and has publicly admitted that it cannot provide sufficient drinking water to cope with existing demands, let alone any increase in demand.

Policy C9

27. The provisions set out in The Canterbury Urban Area Strategy (C9) 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 unfundable.

28. If the large-scale housing developments proposed in the Draft Local Plan (particularly C10 Merton Park, C15 Land South of Littlebourne Road and C16 Land South of Bokesbourne Lane) went ahead they would cause unacceptable environmental damage, particularly to the rural surroundings of Canterbury.

EAST CANTERBURY AND SOUTH WEST CANTERBURY STRATEGIC DEVELOPMENT AREAS

29. The Council says that “*No residential development is allocated in the Countryside*”, yet that is exactly what these allocations are. Neither is part of the Canterbury urban area and together they cover a large area of countryside and productive agricultural land.

East Canterbury Sites C15 and C16 – Land south of Littlebourne Road and Land south of Bokesbourne Lane

30. The Plan proposes 2,574 new homes for this rural area. Besides destroying a large area of countryside this proposal would overwhelm the

village of Bekesbourne. The Plan says that this is “*a highly accessible location and will deliver new sustainable communities*”. This is clearly absurd. The A257 is already at capacity and the huge increase in traffic could never be accommodated. The idea that this large area could be served by the ‘active travel’ of cycling and walking is utter nonsense.

South West Canterbury Site C10 – Merton Park

31. The Plan proposes 1930 dwellings here, but in its desire to encourage ‘active travel’ fails to provide adequate vehicular access. The Plan proposes ‘upgrades’ to Hollow Lane, Lime Kiln Road, Stuppington Lane, South Canterbury Road and Nunnery Fields. None of these is suitable as an access to such a huge development and the Wincheap area simply could not cope with the traffic.

CANTERBURY DISTRICT TRANSPORT STRATEGY

32. The desire to promote ‘Active Travel’ of cycling and walking is laudable enough and will no doubt receive some support, but it must be understood that it can only be acceptable as part of a balanced traffic plan that caters for the travel needs of all existing residents and visitors. The idea that people will be able to walk or cycle to local centres for their everyday needs is fanciful.

33. Canterbury is not and never will be a “cycling town” like Oxford, Cambridge or York: it is simply not flat enough. In particular, the steep slopes up to the Blean and the University to the north of the city centre severely limits the possibilities for large numbers of residents. For a sizeable proportion of the population, cycling is not an option. In order to be viable, supermarket and bulky goods retailers rely on extensive car parking.

34. The Council seems keen to promote the use of electric bicycles and e-scooters: both are powered vehicles and unregulated. The use of e-scooters is illegal except on private land. As one who was nearly killed by a youth out for a ‘fun ride’, I suggest you look carefully at the wording of this section.

35. The idea that a bus-led transport strategy would ensure that people have ‘*high quality sustainable transport options*’ is all very fine, but 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.

36. The Plan says that the aim is *‘to reduce the volume of traffic on the district’s roads, specifically on city centre roads where the majority of congestion is experienced and therefore the volume of traffic is expected to reduce significantly’*. How can this be so when the Council now proposes thousands more houses on the edges of Canterbury, which will inevitably generate thousands of daily traffic movements into and across the city and make the situation far worse than it is today. Traffic from delivery vehicles can also be expected to grow in the coming years.

37. The Plan tries to make its allocations more desirable by showing large areas of *‘Opportunities for green/blue infrastructure’* in its ‘Concept Masterplans’, whilst showing very little in the way of road access. These ‘masterplans’ are quite misleading.

OTHER MATTERS

38. Policy C18 – Wincheap Commercial area

39. I wish to object to Policy C18. How on earth do the planners think that you can retain Wincheap as a trading estate **and** build 1,000 new dwellings? This is simply not feasible. If there is further capacity for development, it should be reserved for business use in line with the Council’s objectives set out in its Corporate Plan.

40. The Council also appears to be resurrecting a £3 million one-way system which has no benefit for the local residents and traders and which the Wincheap Society has already argued strongly against. 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 and the loss of on-street parking in Wincheap, with a quite unacceptable impact on local retailers and businesses.

Policy R13 – Local Service centres

41. Policy R13 includes both Harbledown and Rough Common, yet Harbledown has no services and Rough Common just one shop. Both should be reclassified as villages and moved to Policy R20 – Countryside.

CONCLUSION

42. 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

43. In my view, as 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 National Planning Policy Framework (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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