
Local Plan Regulation 19 consultation

From Jim McDonald [REDACTED]
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To Consultations <Consultations@canterbury.gov.uk>

 3 attachments (67 KB)

Local Plan 2040 consultation response.docx; Local Plan Brooklands Farm Focused consultation Sept 2025.docx; Brooklands Farm planning application response June 2025.docx;

--Email From External Account--

I set out below my Local Plan Regulation 19 consultation response. I am responding as a resident who has lived in Whitstable for the past 47 years. I do not wish to speak at the Independent Examination.

I understand that the representations are to be focused on whether the Plan:

has been positively prepared

is justified and effective

is consistent with national policy.

1 Positively Prepared

There is no denying that officers and councillors have given a lot of time and thought to the preparation of the plan and it is an impressive piece of work which takes account of some of the previous responses from the community. However, the Plan has been prepared in the way that local plans have been for some time now and time has shown that that approach is ineffective. It is a way of planning geared to enabling developers to maximise profits by not meeting full infrastructure costs that a development of over 23000 dwellings would require. As Lord Gascoigne, Chairman of the Built Environment Committee has said "An infrastructure first approach should be adopted; the common approach of only providing physical, commercial and social infrastructure once houses are built needs to change." In my view to achieve this the council needs to have started from a different place and it would have led to better conclusions. The council ought to be looking at a new town.

This draft plan makes provision for 23085 homes over a 17 year period by tacking them onto and within existing settlements where the infrastructure cannot cope. Putting this scale of housebuilding into context it is a 34% increase on the number of homes in the Canterbury District at the 2021 Census. It is 37% bigger than Whitstable was at the 2011 census.

The proposed local government restructure and the likelihood of an East Kent Unitary council provide an opportunity to look on an area wide basis at provision of a new town properly planned as recommended by the Built Environment Committee. The government and local government need to be considering reorganisation and local plans development holistically.

In addition, the preparation has lacked consistency of thought. The reasons the council excluded the university site from the final draft plan apply equally to the Brooklands Farm site which remains in the plan.

2 Justified and Effective

I do not believe it is justified nor effective. The plan is not meeting local needs. As the population growth over previous plan periods show the housing provided is primarily allowing inward migration. This is likely to

continue as Kent County Council anticipates a further 250,000 people living in Kent by 2030. I think the basis for identifying housing need is questionable.

3 Consistent with national policy

It is in so far as the plan provides sites for the number of assessed dwellings needed over the plan period.

I also wish to comment on **the Whitstable area** and specifically the Brooklands Farm site.

I agree with all the detail which the Save Brooklands Farm group addresses and have not repeated that in my response. I attach my previous responses for ease of reference.

Finally the Transport Policy to my mind is addressing the symptoms and not the causes of the district traffic problems which have been created by the old style local planning approach of tacking on sizeable developments to existing communities. It also fails to recognise the reality that the majority of those who will occupy these new homes will rely on car use not buses, biking and walking. The solution is to not keep adding to existing communities but to take an infrastructure first approach as Lord Gascoigne advocates and build a new town with proper infrastructure and planned connections to existing centres.

James McDonald

