
Comments on Reg 19 Draft Local Plan consultation

From Peter Slaughter [REDACTED]
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To Consultations <Consultations@canterbury.gov.uk>

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Dear Sir / Madam,

A few comments on the Reg 19 CCC Draft Local Plan:

The Plan is not sufficiently supported by up-to-date evidence and the "right information" as required by policies 32, 36 and 44 in the national Planning Policy Framework. A few examples:

In the "Sustainability Appraisal Report (SA) - Draft Canterbury District Local Plan - Reg 19 Draft (2026)"
prepared by WSP (Shrewsbury).

1. Unfortunately, the consultants preparing this report, based in Shrewsbury, appear to have inadequate knowledge of Canterbury District. Consequently some of their assessments are inaccurate and misleading.
2. The Sustainability Appraisal states "Policies W4 and W5 would ensure the creation of large-scale mixed development, including the creation of new business floorspace and flexible working spaces (4,000sqm business floorspace). These policies would also provide a Park and Bus facility (led by Policy W5 and supported by Policy W3) that would support the accessibility of any business and retail spaces created" (para 5.8.28)

The creation of "new business floorspace" is likely to have little impact on local employment. Landowners find it profitable to convert office space into apartments, as happened recently at Bay View, Old Thanet Way, Whitstable (66 apartments).

The much talked-about "park and bus" idea is, according to local people, unlikely to be viable in the long term. There is no bus service at this site, not even a bus stop, although a nearby housing development (approved over 10 years ago and now almost completed) was supposed to provide a service. The idea of a park-and-ride bus was tried several years ago but was unviable.

The park-and-bus idea is flawed for many reasons, first of all most visitors to Whitstable do not pass this location, and even more will miss it in future if the new A299 junction is built at Radfall Hill. Another good reason it is unlikely to work is that there is a frequent bus service on a different route where there is free on-street parking. Local people are absolutely certain the proposed park-and-bus car park will be developed for more houses.

3. The SA identifies “Mixed effects” on biodiversity, heritage and communities, but local evidences suggests this is very over-optimistic.

Anyone who knows the sites at W4 (Brooklands Farm) and W7 (Bodkin Farm) knows that it is farcical to suggest any biodiversity improvement from urbanising the rural landscapes on these farms, which both include ancient woodland and protected species such as hazel dormice, and which both serve useful functions as wildlife corridors supporting nearby wildlife sites. Impacts would be all negative.

Unfortunately, the ‘Appendix G Site Assessment Appendix C Site scoring matrix’ omits to mention the Clowes Wood Barrows Ancient Monument that overlooks Brooklands Farm, and would be negatively affected if the surrounding farmland is urbanised. The people who built the monument about four thousand years ago were farmers from the surrounding farmland, so in losing the farmland the monument loses much of its identity. The assessment also needs to consider increased physical damage from recreational use, mountain biking for example - this already happens.

The Local Plan’s proposals would have a very negative impact on the community of Whitstable. There is no money for any increase in health facilities and these are already near breaking-point. The proposals would strip Whitstable of much of (what is left of) its open landscape countryside where residents can use the local footpath network to relax and enjoy nature in a natural setting. The proposals would add yet more sewage pollution to our beaches, bathing waters and seafood. Yes, some people like to catch fish and other seafood along the shoreline. Impacts all negative.

4. The SA says “The Regulation 19 HRA findings are that there are no adverse effects on -- Tankerton Slopes and Swalecliffe SAC or Thanet Coast & Sandwich Bay Ramsar/SPA, from these policies in relation to recreational pressure -- or in relation to functionally linked land.” When I spoke recently with a very knowledgeable local ornithologist, he was absolutely certain that the Local Plan’s urbanisation at W4 Brooklands Farm and W7 Bodkin Farm would negatively affect the Thanet Coast & Sandwich Bay Ramsar / SPA, because the seabirds from those areas feed on the farmland at high tide and when they need to take shelter in bad weather. Come down to these fields on a windy day at high tide in winter, and you will see large flocks of birds taking shelter and feeding.

5. Comments on the “Appendix G Site Assessment Appendix C Site scoring matrix”:

Appendix G gives “Access to public Transport” a ++ score, but a score of -- might be more appropriate. Most people want to commute to Canterbury, however the bus service is relatively infrequent and prone to delays in long traffic jams on the approach to Canterbury. In principle, a new bus service could be provided, but the evidence from the development for 400 houses at Whitstable Heights is that even 10 years after grant of planning permission the promised bus service has not arrived.

Appendix G gives “Open space/health/community facilities” a ++ score, but this should be a score of - - (minus minus). The proposals strip Whitstable of its local countryside and rural footpaths that mean so much to local people. Health facilities are currently over-stretched and would become worse with more residents - there is no money for any improvements according to a local GP. Community facilities - the developers may have done a deal with the local cricket club, but this doesn’t outweigh the loss of the much loved local countryside and rural footpaths where local residents can unwind and take their dogs for their daily walks.

Appendix G gives “Access to employment “ a ++ score. But a minus score would be more appropriate. Most local people commute by car to Canterbury. Medway etc, so the development will simply lead to more traffic. The development would be better located in Canterbury to save increasing road traffic and congestion. Local office

space has been converted to more profitable apartments, so even if the proposals build more offices, no doubt these are at risk of becoming apartments too.

In fact there are many other examples of poor evidence and inadequate information, unfortunately I do not have the time to enumerate them all.

Thank you for giving this your attention.

Yours sincerely,

Peter Slaughter