

The Conservative Group on Canterbury City Council
Response to the Draft Local Plan Consultation 2024
June 1 2024

The Conservative Group on Canterbury City Council does not support the Draft Local Plan as it stands on the grounds that it is not fit for purpose.

1/ We call for the Council to challenge housing numbers and to make a case for exceptional circumstances under the National Planning Policy Framework.

2/ We call on the Council to make available the Jacobs transport model for the new proposed bus-first policy as without this it is impossible for anyone in the district to have a reasoned opinion on how it will work or affect travelling.

The basis for calculating housing is based on ONS2014 and that is now long out of date and more recent population data should be considered. We should be building housing for local needs that is affordable and creates communities. Over-development means we are creating dormitory bolt-on housing schemes with insufficient infrastructure that relies on workers travelling west to the Medway towns or London for work.

The Council has paid lip service to creating a true garden village but should take on board the findings of Lord Matthew Taylor's 2015 report and think strategically. Likewise, while we welcome the proposed brownfield housing scheme in Wincheap to provide a much-needed additional 1,000 new homes, we believe this plan could have gone much further and been a far more ambitious scheme.

We acknowledge that the Local Plan is one of the most, if not the most, serious policy documents that we as elected district councillors enact. We are setting the future plan for housing development and other vital infrastructure within our district and are responsible for reflecting the views of residents on how they wish to see the place that they call home develop and be a place where they, their friends and family can prosper and thrive.

It is therefore imperative that the Council takes every option open to it to ensure that residents are listened to, and that any decision is made in the best interests of everyone who lives, works or studies in the district.

We are proud that the Local Plan still contains many of the policies that the Conservative administration in 2019-2023 worked hard to achieve in terms of delivering better outcomes for biodiversity, heritage, the design plan, housing density and climate change mitigation. However, we believe that there are too many conflicts in this Local Plan that counter the good work that the Council and councillors have been doing to improve biodiversity, support our precious open spaces and countryside, and to make the provision of cheaper and renewable energy options available to all. We believe that the Local Plan should be strengthened to ensure that solar on new house builds along with other energy efficient heating schemes should be mandatory on all new housing developments.

We also believe that the Council is too focused on promoting developers rather than listening to community voices and is not acting accordingly to ensure that development is in keeping with local needs.

We believe that this Local Plan is reliant on:

- too much large house development (3-4+ beds) without the correct infrastructure and too little focus on brownfield development of affordable housing;
- over-development of our rural communities and quality farmland that should be used for growing food;
- a lack of jobs to match housing – an over-reliance on bolt-on developments which will see villages turned into dormitory towns for commuters working in London and West Kent;
- a transport plan which is based on conjecture rather than real modelling and does not take into account the realities of how people wish to travel;
- pays lip service to biodiversity. While we are proud of the BNG 20% ambition that our previous Conservative administration developed, the plan is then let down by poor consideration for wildlife corridors and too much focus on large house building schemes to the detriment of the varying landscapes and the environment of the district;
- a lack of focus on energy provision – we expect mandatory solar on all housing for instance and believe there is little thought for how new builds in rural areas will be energy efficient;
- a sad lack of investment on heritage outside Canterbury;
- insufficient infrastructure planning for health, sewerage, electricity, roads and water;
- too little protection for open space in new developments and the endowment scheme to manage open space in perpetuity has been watered down;

We believe that the number of new homes we are being asked to have built by 2040 is excessive given the unchanging demographic within the district since 2014 and that Canterbury City Council should be challenging the numbers and pushing for a decision to be taken locally based on the latest population figures. There is an over-reliance on the universities and student numbers when calculating need and that is being translated erroneously into building more large houses. The latest indications are that the district needs fewer large houses and more one and two bed homes for younger families starting out and older people downsizing.

While we accept that the reforms made to the National Planning Policy Framework are not as open-ended as perhaps some have interpreted, we still believe that given the special nature of the district – AONB to the south of Canterbury; that Canterbury is a medieval city; the coastal strip including Whitstable and Herne Bay has been built out and is over-developed; that the special nature of the countryside and farm land from Blean to the Wantsum Valley should be protected – that the council should be making the case for exceptional circumstances and seek to reduce housing numbers in this local plan. Citing the argument that delaying the Local Plan will cause damage to the district from developers taking advantage of there being a lapsed plan is erroneous in our opinion. We were told we had to rush the plan through in 2023, and yet this administration is now looking at a deadline of 2025. We believe that if the plan is delayed into 2026 in order to allow a challenge of the housing numbers, then in the longer term this will protect the district and particularly sites such as at Blean (University of Kent land). We believe this a risk worth taking to get the best outcome for the district.

Specifically, we are strongly opposed to the proposed development of 2,000 houses on University of Kent in the area of Blean and Rough Common to the north of University of Kent. This is not in the interests of local communities or indeed of the district as a whole. This conflicts with the plans for rewilding Blean and developing wildlife corridors to improve biodiversity from west to east across the district. It is also likely to put pressure on the Sarre Penn River and drainage across the district with the risk of flooding in the east.

The Conservative Group rejected this development in the 2022 iteration of the draft Local Plan as in our opinion it is unsustainable and has major negative implications for transport given the lack of local infrastructure.

The Conservative Group played an instrumental role in declaring a biodiversity emergency in the district in October 2023. But it strikes us that there is now a conflict within the Council. On the one hand it is working hard to develop a nature recovery strategy for the district, while at the same time it is too heavily focused on incorporating large developments into the Local Plan which will hamper this positive biodiversity focus.

We are also extremely concerned at the omission of the transport modelling in the Local Plan documents. Both CCC and KCC officers have confirmed this as unusual and far from ideal. This modelling produces forecasts of future vehicle traffic on the road network, which is absolutely critical information for considering the merits of these proposed new development. We cannot expect residents to give an informed view in a public consultation of the Local Plan without information showing forecast transport volumes on our district's main roads.

Furthermore, if the Council's transport strategy is to be "Bus First", how can we assess the likely success of that plan? We know that buses only gain patronage when they travel along an uncongested network in good time, consistently arriving at bus stops at the scheduled time. Without an assessment of traffic on the bus routes, we cannot give a view on the viability of Bus First and the Transport Strategy as a whole.

We understand that Canterbury City Council has asked Kent County Council to run the Jacobs transport model, albeit too late in the process to meet the consultation deadline. It is unacceptable for CCC to try to dodge this issue by offering a discussion of those traffic forecasts at a future Joint Transportation Board meeting. Most members of the public will not be able to attend a one-off meeting and it gives no way for residents to give structured responses into the formal consultation process.

For this, and the other reasons mentioned in this response, we are unable to support the draft Local Plan as it stands.