

Comments in relation to Chapters 1, 2, 5 and 6

The need for updated revised information informing planning policy

The Council's housebuilding goal of 1,149 units, as outlined in policy SS3, implies an **expected yearly increase in population of 2,757 people**, assuming an average of 2.4 individuals per home.

This appears to be a significant overestimate as shown below:

Based on data from the Office for National Statistics, this level of growth has been recorded only once in the last two decades and in 2021 the District population even shrank to pre-2015 levels.

The following statement is found regarding official ONS population projection in Canterbury in the 2021 Canterbury City Council Housing Needs Assessment report produced by Edge Analytics / Domus:

<https://www.local.gov.uk/sites/default/files/documents/Housing%20Needs%20Assessment%20%28September%202021%29%20%281%29%20%281%29.pdf>

the "latest population projection from the Office for National Statistics (ONS) [,,] estimates an 8% increase in Canterbury's population to 2040. This is lower than the earlier 2014-based population projection (ONS-14), which projects a 15% increase."

After the report was completed, census data showed the population to be only 156,631, meaning that the real average population growth from 2013 to 2021 was only 290 people per year.

The population growth forecast for 2040 should be calculated using the correct figures using the actual population of 156,631 from 2021 as a baseline and LHN growth estimates to 2040. That would result in a projected **District Population of 171,182 in 2040, roughly an increase of 9.2% over the 2021 population**, roughly matching the 8% figure quoted by Edge Analytics. This would result in a net building target of **927 dwellings per year** (rather than 1120) which would make a very significant difference to the bias adopted by the Council in favour (or not) of development and whether the Council is prepared to spend money to defend its proposals to develop in unsuitable places.

The market-driven rate of housebuilding over the last decade, which is around half of the 927 figure, also clearly indicates that even developers are skeptical about the need for the number of new houses that the Council's Local Housing Need calculations suggest.

The Times on Thursday 2 May reported that "In recent months 15 local authorities have cut the number of homes they intend to build over the next decade by 10 per cent on their previous plans. South Staffordshire council has reduced its annual housing target by more than 40 per cent and Hertsmere council in Hertfordshire has cut its plans for new development by 25 per cent.

Legal fees are an important aspect. The Times article states that "Over the past three years average annual spend per council [in legal fees] increased by 146 per cent." and goes on to mention in particular "councils in southeast England where pressure against new

developments is greatest”. “Medway council in Kent spent £680,000 on legal advice -relating to planning appeals, and Central Bedfordshire council spent £633,000.”

The previously quoted Edge Analytics report goes on to say that “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”

In light of the arguments above, the Council should factor in the very high risk that it could find itself fighting many costly court cases over poorly documented development plans and fully take advantage of both the current “dispensation procedure” mentioned in the Times article to revise down its planned housebuilding numbers while still possible, but time is of the essence. It can use all the powerful arguments listed above but primarily the revised population growth projections based on real numbers, which suggest that the number of new houses that need to be built every year is a maximum of 927.

In parallel, the Council should prepare a new set of population growth projections anchored in reality to ask Central Government for “exceptional circumstances” which in the case of our World Heritage area with a keen interest in encouraging tourism “justify an alternative approach which also reflects current and future demographic trends and market signals”.

An authentically “strategic” Local Plan would take into account a variety of key concerns when putting forward sites for development. At the very least, the following aspects should form part of the consideration and the Council should publish its justification in a transparent manner:

Influence on traffic flow

Environmental consequences

Strain on educational and healthcare facilities

Necessities for water provision and wastewater management

Provision for sufficient diverse open spaces within the development

Effects on World Heritage sites, Sites of Special Scientific Interest (SSSIs), Areas of Outstanding Natural Beauty (AONBs), and local designations (such as Country Parks)

Advantages for the current residential communities

Implications for local employment opportunities

This would go beyond the insufficient Summary Site Appraisals published in <https://www.canterbury.gov.uk/sites/default/files/2024-04/Sustainability%20Appraisal%20Report%20Regulation%2018%202024.pdf>

because it would include key information in narrative form which is missing from those tables.

Particular comments regarding Proposal C12 of Chapter 2 – Turning parts of The Blean into urban areas

The Council's own appraisal states that "Significant negative effects were also assessed for biodiversity, landscape, and historic environment" so prioritising a massive development here is certain to be a very expensive, fraught, time-consuming endeavour for the Council. Even if some form of development were to eventually go ahead (although this is by no means certain) it does seem that the Council resources would be more efficiently used elsewhere. The University's financial situation should not force the Council, through bad planning policy, to allow housebuilding on an unsuitable site. It would be a misallocation of taxpayer money.

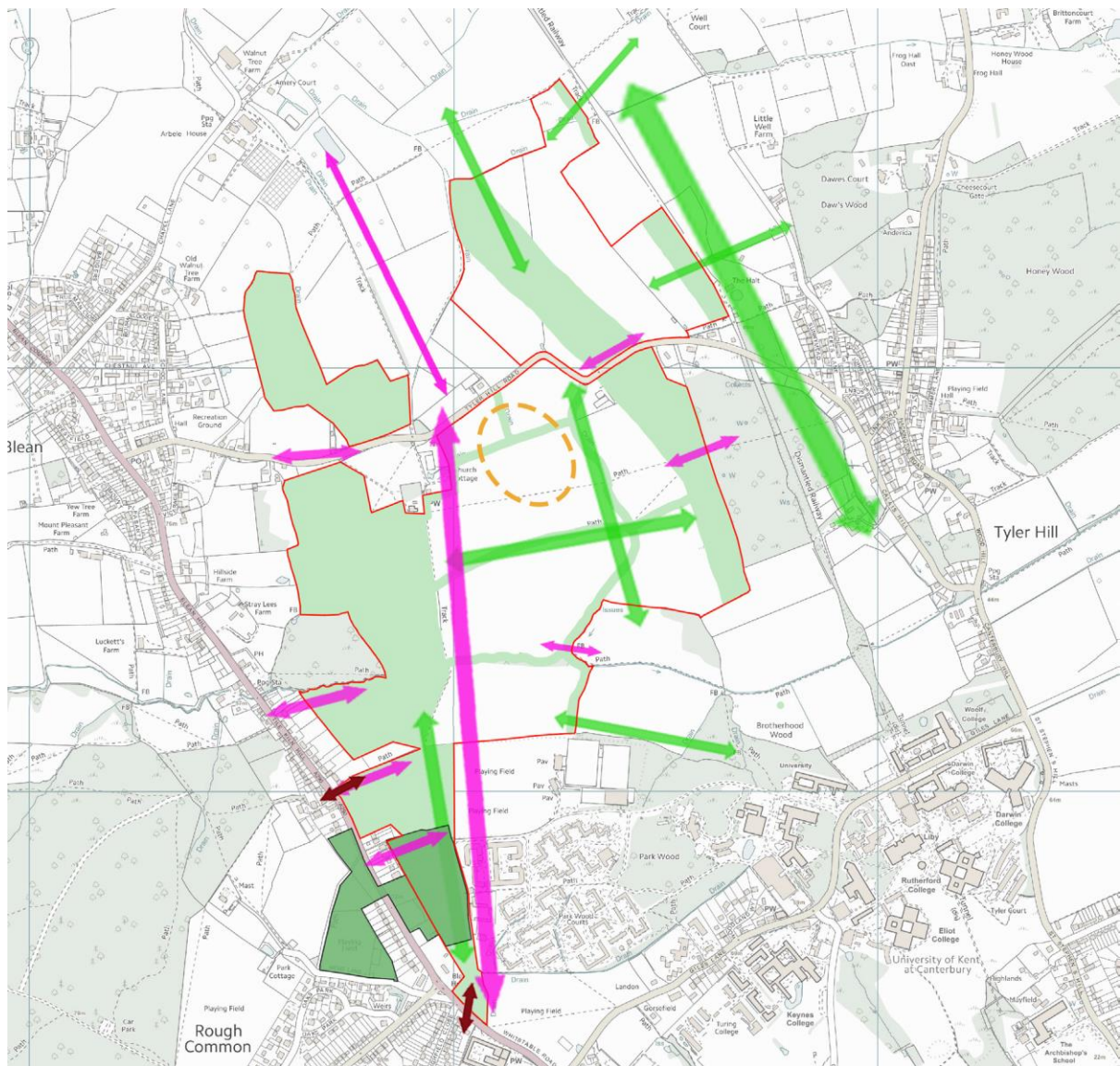
The "change in the character of the site and open countryside in this location, which is also a green gap" is recognised as being a key issue in the Council's own documentation. For this reason the proposal should clarify that the current rural land firmly situated within "The Blean" (a recognised name for this biodiversity improvement area in the County planning maps

https://www.kent.gov.uk/__data/assets/pdf_file/0004/112585/Kent-Minerals-and-Waste-Local-Plan-2013-2030.pdf

will become urban under proposal C12 – and since it is currently well outside city limits it should not be listed under the Canterbury section of the Plan, but under Chapter 5 Rural Areas. It should be listed under an appropriate title such as "The Blean". The Plan should be rewritten to reflect this.

It is not clear what the Draft means when it talks about "Strategic scale landscape mitigation will be required for development of the location." The Plan should be rewritten to clarify this aspect and go into sufficient detail to permit an in-depth commentary.

Several of the listed and heritage buildings identified (Scheduled Ancient Monument, is adjacent to Church of St Cosmus and St Damian Grade 2* Listed Building and Church Cottage, Blean House, Hothe Court Farmhouse and Barn adjoining Hothe Court Grade 2 Listed Buildings) are close to the intended southern access point, which is indicated in an unsatisfactory manner on the diagram provided in the Plan.



Should the double headed dark red arrow be taken to mean that the road will cross private land opposite Kent College? If so, the Draft contains no information as to how this will be resolved and what mitigation measures would be contemplated to have this newly created busy road pass next to several listed buildings while still maintaining cycle path access as to not discourage cycling along the Crab and Winkle Way, an important recreational and eco-transportation route linking Whitstable to Canterbury, with historical roots and links to the Canterbury and Whitstable Railway (Hackington & Blean) Conservation Area.

“The site is located within a Mineral Safeguarding Area (MSA) and therefore significant negative effects were assessed for geology (SA Objective 4).” – the plan should give more details about the nature of the geology that prompted this finding.

In terms of the significant negative effects due to the presence of waterbodies on site (SA Objective 6), already recognised as being a key issue, I submit as evidence the photo below, taken after heavy rainfall on Tyler Hill Road which regularly floods:



Flood mitigation affects a wide area and the clay layers on which the proposed development will be built will make it more, not less likely that the flood and pollution risk will increase for the nearby residents. Water companies are not the only ones with a responsibility to manage this risk. The Council, through its planning policy, should prioritise sites that do not carry this risk premium in the first place.