

CCC Local Plan to 2045 – Comments on the current consultation.

16.12.22

As I read through the latest consultation documents I'm also reading "The Climate Book", compiled by Greta Thunberg. "The Climate Book" is a collection of essays by world experts in climate science and biodiversity and it makes very uncomfortable reading. Many of us know the problems we face with Global Warming and Biodiversity Loss but to read it again in such graphic detail is both chilling and deeply worrying for future generations.

I am also listening to dire warnings by the IPCC and the Director General of the UN in his opening remarks at COP27 who believes we are on "a highway to climate hell". To have any chance of limiting the temperature rise to 1.5 degrees C above pre-industrial levels we need to be halving our emissions of CO2 by 2030, whereas emissions are currently still rising! The world response, says the Director General, has been "woefully inadequate" and we are heading for an existential catastrophe. . **The Earth is now close to several "tipping points" from which it will not recover.**

I am also just reading that Bristol City Council, one of Britain's leading Climate Action councils, has rejected (not just challenged) the Government imposed housing numbers in favour of an evidence based assessment of their housing needs.

Greater action is thus needed by us all, personally, but most critically by international, national and local governments. COP27 did not go well for reducing carbon emissions.

With all this in mind I am commenting on the Local Plan to 2045. The Plan is very comprehensive and contains some very good proposals but, as there are many local organisations and residents who are far more qualified than I to comment, I will limit my comments to Carbon Emissions.

First the good news. In the "Climate Change Topic Paper : Section 2 : Key climate change policies" I applaud the Council for proposing new zero operational carbon emissions standards for all new building. However, this has come far too late as many other councils around the country are already implementing this policy (document notes that The Greater London Authorities' have had this policy since 2016!!). and if this policy is not implemented until the Local Plan is approved,

we may be looking at a long wait!! I suggest that the Council should implement this as a special policy as a matter of some urgency to show it is serious about tackling this existential threat.

In section 4 of this paper, words such as “as soon as is practicable”, “evaluated and minimised”, “must be extremely energy efficient”, “retrofitting... must be fully enabled through a variety of measures are all aspirational only with no solid targets or timescales.

It is also good to see that the Council is also addressing embodied carbon emissions as operational carbon emissions are only part of the picture. However, here again, the proposal is only to ask for embodied carbon emission assessments and reductions for new developments without setting any targets for what those reductions should be. If the Council itself is aiming for zero carbon by 2030, this should be in both operational and embodied energy emissions. For the District, there are elements of this Plan, namely building more houses than we need to fund a bypass we do not need, neighbourhoods which force drivers to INCREASE their car mileage if they need to use their cars and building the bypass itself, which all fly in the face of a policy that is aiming to REDUCE embodied, as well as, operational emissions.

Reconfiguring the transport system to enable significant shift in local journeys by foot, bicycle and public transport away from individual car journeys is laudable but how and when?

Equally, I support the enabling of a rapid increase of renewable electricity generation of all types across the District but there are no targets or timescales to go alongside this aspiration.

In section 5 of “The Climate Change Topic Paper” there is a clear statement that reducing emissions from road transport is a key component of reducing the causes of climate change but this “crazy” proposal to create neighbourhoods (and not allow vehicular traffic between) and the building of 13,000 more houses AND a ring road will only go to INCREASE EMISSIONS from road transport and should thus be strongly opposed. Existing green spaces and agricultural land should be protected as these are absorbers of carbon dioxide, our lungs and source of food. Any proposals to build in the Green belt and on agricultural land should be strongly resisted.

There is a much better solution.

To reduce the amount of congestion within Canterbury, we need to “make do and mend” (a good sustainable principle) and make do with the infrastructure we already have. To do this, I repeat the proposal contained in CCAP’s (The Canterbury Climate Action Partnership) response to the previous “Preferred Options Consultation”:-which still holds good:-

“Closing the inner ring road and giving over the space to cyclists and pedestrians is a positive aim of the Council’s proposals and should be endorsed. However, it should not be at the expense of building new roads, given also that the evidence shows these generate more traffic flows. Rather, we suggest the following proposal be given serious consideration:

- Firstly, a fuller assessment of traffic use should be undertaken. Most of the traffic currently using the inner ring road of the City is local, not through-traffic. Therefore, the creation of new bypasses to the East and the West would have little impact on reducing congestion.
- Promote a District ‘Outer Orbital’ road system (A2/A299 to the west/north) and to the A2/A256 south/east and reinforce this with signage.
- Within the orbital route, the area should be made a Clean Air Zone subject to local traffic control.
- The current ring road and key parts of the A28 to be closed to traffic and given over to cyclists and pedestrians. It will be essential to cut off all possible ‘rat runs’, so that any route across the District is far slower than the orbital road system. We do not agree that the only mechanism for reducing traffic on the inner ring road is the building of new bypasses to the East and the West. Firstly, as stated, the bypasses would scarcely affect localised traffic, and secondly, through-traffic moving Ashford-Thonet and Thonet-Ashford could satisfactorily be directed to the Outer Orbital to the north and south of the District.
- Traffic coming into the area’s Clean Air Zone to be controlled by emissions, weight (no trucks - only small/medium vans for deliveries etc.) and time (when can deliveries be made etc.)
- The above will also greatly benefit the villages along the A28 and free them from heavy traffic and pollution.”

To this, I could add that if a congestion charge is levied for all vehicles (other than local residents and businesses) then the funds raised could improve the public transport and active travel systems of the District. London has just extended their clean air zone to almost all the land inside the M25.

On housing, we need to build the houses we need in the location that they are needed. Here I echo and support the proposals put forward by CCAP during the previous consultation, which also still hold good:-

“We welcome the opportunity to contribute to the draft vision for the District in the Local Plan. We would like to endorse – with reservations – both Canterbury Focus A and the New Freestanding Settlement. However we feel that the ONS data used as the basis for the Canterbury Housing Needs Assessment (HNA) requires more careful consideration in light of important recent national developments tilting planning debate towards greater sustainability.

Specifically, we would like to make the following recommendations for housing:

- Once the ONS data of population demographics is more robustly established, we recommend the construction of homes as required throughout the District, in Canterbury, the coastal towns and in the rural villages. These must be carefully located developments of mainly social and truly affordable homes on small/medium brownfield sites so that local communities are not swamped by development. They should be on sites determined by the planners in consultation with the community on the basis of need, rather than on the developer-oriented ‘call for sites’ process.
- Once the brownfield site developments have been considered, the remaining housing requirement, if any, should be given a zero-carbon, stand-alone eco-settlement based around an existing railway station in the District. Better still, the City Council should think regionally and consider working in partnership with neighbouring authorities such as Faversham and Thonet, to create a larger and more sustainable eco town.

Conclusion

To avoid Canterbury being a net contributor to the impending existential catastrophe awaiting the Earth (and this is no exaggeration), nothing in this Plan should be a net contributor to carbon emissions, both operationally and embodied. The Council need to be very bold in their approach, as say Bristol City Council, and put climate action at the heart of all they do. In this way CCC will get much support from the residents of the District rather than, as I suspect, a groundswell of voices opposing house building numbers and road building proposals.

I thus implore the Council to show courage and climate leadership. Only build houses that are really necessary, primarily social and truly affordable, zero carbon homes AND BUILD NO NEW ROADS.