

## HOUSING TARGETS?

My understanding is that central government, under political pressure, will no longer be setting mandatory targets for housing for local councils. The targets were in any case widely seen as unrealistic, all the more now so in the context of recession and inflation. See inter alia

<https://news.canterbury.gov.uk/news/council-calls-on-ministers-to-suspend-housing-delivery-sanctions/>

Acceptance of current realities rather calls into question the statement in the Local Plan that "national policies have increased the level of housing growth the government expects in our district". The Council's underlying needs assessment on housing is out of date. The target of "An average of 1,252 new dwellings per year" (Policy SS3 1(a)) is clearly undesirable as well as unachievable.

This has knock-on effects on many aspects of the Plan, which consequently need rethinking. The Plan must not be put forward to central government until rectified in the light of political and economic realities.

## MORE ROADS, MORE BLOCKAGES, LONGER JOURNEYS

I am not in favour of the strategy for Canterbury city zoning. Nor am I in favour of the associated "outer ring" concept. Some reasons follow.

Surely "the provision of road links at the outskirts of the city [which] will create new points at which to access the city by car" (Plan para 1.23) would be at odds with the proposal to bottle up/block traffic as it comes close to the city.

Proposal C5: "The provision of the South West Canterbury Link Road with a new A2 junction and connections to A28 at Thanington" is without merit.

SS4, 2(a) "The relocation of key city centre car parking to locations outside of the inner ring road" may free up existing parking lots for building development, which seems to be favoured (but see Housing above) but it would make things difficult for shoppers. Older people would be increasingly restricted to their homes if shopping is made more difficult/circuitous.

## ZONING/BLOCKING AND INCREASED TRAFFIC

On roads, the aims in the background Evidence provided are said to be to "improve travel choices, travel awareness and road safety within the area,

reduce traffic congestion and travel demand, improve journey time reliability, and reduce greenhouse gas emissions as a result of traffic congestion" (From Project No: B2432000. Document Title: Canterbury Local Plan – Preferred Strategic Growth Local Plan Option. Document No.: 6. Revision: 2.0. Date: October 2022).

However the consequences of the zoning/blocking will be a significant increase in journey time, a reduction rather increase in "travel choices". Possibly "journey time reliability" may be decreased in some cases (it's hard to judge) but at the cost of greater journey times per se. There must be significant increases in "greenhouse gas emissions" although these would result from longer journey times rather than from "traffic congestion". Also possibly increases in people's fuel costs.

#### METHODOLOGY, TERMINOLOGY, DEMOCRACY

The way some of the criteria are phrased and deployed (same doc as above i.e. Project No: B2432000. Document Title: Canterbury Local Plan – Preferred Strategic Growth Local Plan Option October 2022) is unfortunate.

For example, journey time "reliability" and "greenhouse gas emissions as a result of traffic congestion" are more than being cumbersome terms – they also conflate different concepts. Such terminology cannot be regarded as being coherent. Key terms should be specified/deployed with more care.

For example, if emissions increase overall, that being due to traffic being spread by zoning blockers over much wider areas, then maybe one could say that emissions "as result of traffic congestion" fall, but in real terms what had been gained and lost? Possibly there could be rises in emissions as a result of traffic dispersal over additional miles.

Crucially, the portmanteau nature of terms deployed often appears to cut across the understanding of citizens, reducing the scope for democratic steering of the Council.

This impression is heightened by the density of the Plan as presented, by its opacity in some respects, and by the mix of high-level proposals and detailed local pictures. If this is state of the art, in the view of the Council, then the art appears to be befuddlement.

A final example, from SS4: "(f) Implementation of an ANPR-based sectoring system and modal filters to limit cross-city trips". I beg your pardon?