

I thank the City Council for the opportunity to comment on the draft Local Plan, 2020 to 2045. In view of my limited remaining personal stake in that period, I refrain from commenting in detail on Policies, but I am aware of pertinent and critical submissions which have been made to many of these, and I hope the City Council will pay full attention to them. I am also aware of the very constructive submissions, especially on Canterbury City issues, from organisations including in particular the Canterbury Society, Canterbury Climate Action Partnership (CCAP) and the Alliance of Canterbury Residents' Associations (ACRA); and I wish to endorse the request from the Canterbury Society and others that the period for the final drafting of the Local Plan should be extended, to give time for the public's views and objections to be reflected in the finalised Plan.

I understand the nature and purpose of Local Government Plans, as defined in law and interpreted by Government. I also understand that the City Council must submit a single Plan for the whole District; but the Council's own questionnaire recognises that the public will want to concentrate their comments on their own area within the District. The City of Canterbury itself, as a World Heritage location, as a name known world-wide, and deriving from these advantages as a place substantially dependent on the continued integrity of its character, demands to be considered as an organic unit, and in its global as much as in its local context; the collective responses I mention above do so, in so far as the issues they raise require it, and I follow them.

I understand too that subject to a number of criteria (such as the economic, social and environmental objectives, referred to in paragraph 8 of the NPPF system), the essence of the Local Plan comes down to a requirement to designate land for housing development, to such extent as to achieve the actual construction of target numbers of new dwellings prescribed on behalf of Government (albeit based on obsolete data and outdated Whitehall calculations). But the actual achievement of these required dwelling-numbers depends not on land allocations or planning consents, but on developers' decisions on when, and indeed whether, to build as their consents allow. Current experience is that developers' decisions lag a long way behind land allocations and consents. Attempts to encourage more building by increasing the number of consents can only be ineffective, because although allocation is an opportunity to developers, it does not make them start building; naturally, the motivation of developers is simply their companies' economic benefit. The only effects of additional consents is to give developers overall a wider choice of consented sites on which to build their economic number of houses, and to dilute the planning authority's power to decide precisely where and which houses will actually be built.

In this context, the request of other respondents in this draft Local Plan consultation, that the City Council should give itself time to see what comes of the recent suggestion by the Secretary of State for Levelling Up, Housing and Communities (namely, that the Government's housing numbers, currently 'prescribed', should become an 'advisory starting point') seems timely, and I support it. But I think there are other reasons too for taking a respite to re-check on the adequacy and relevance of this draft Local Plan. These reasons arise from the concept of Canterbury City, as distinct from the District, as a unit; from a broad view of the environmental scene; and from a realistic appraisal of economic prospects.

Paragraph 8 of the NPPF system dissects a local authority's responsibility into economic objectives, social objectives and environmental objectives; for the City of Canterbury at least, there is more to it than that, and the Local Plan ought to include a recognisable and coherent panoptic appraisal of the City's prospects and needs. It would be good to find in the Plan an expression of how the City's character is to be identified, supported and developed in the light of its history and its potential future; but instead, the dominating impression we get is only a determination to surround the City with an excess of houses: an excess, that is, over what the Government demands; and not for the proper purpose (to provide housing for people who need it), but to finance a new by-pass road.

It would be too simplistic to dwell on the circular nature of this objective (building extra houses to finance a road which will provide for the increase in vehicle numbers, due in large part to extra houses), and other respondents have spelt out specific environmental and cost reasons for opposing it – reasons which I support and need not repeat, but I should like to follow up both of these themes with a longer perspective.

By its nature, even if successful, the proposal to permit more houses than Whitehall now requires cannot produce funding for the new road before the latter years of the Local Plan – the 2040s – because only then would the developers' contributions have accumulated. Others have rightly pointed out, and quantified, the environmental damage which both the construction and the use of a new road will cause; going beyond that, I would add that it is difficult to believe that by the 2040s such a road-building project will be conceivable. 2045 is now 22 years away; we have only to look back to see how much actual deterioration in the global environment has taken place in the last 22

years, how much our knowledge of that deterioration has increased, and how much more widely (if as yet inadequately) public acceptance of this knowledge has grown. The signs at present are that the rate of this global deterioration is increasing – we know that even the rather minimal pro-environmental actions to which governments commit their countries are defaulted upon – and there is good reason to think that public concern about the environment will increase substantially by the 2040s. It is impossible to foresee in detail how this concern will manifest itself, but it is surely unlikely that re-directing motorised traffic onto an (environmentally-destructive) by-pass road will be either an adequate or an acceptable response to the environmental challenge.

But even if this were not so: there is no apparent reason to believe that allocations of extra land for house-building would as the City Council hopes generate the money needed for the new road – even leaving aside the other social needs which developers' contributions should cover. As I have noted above, the allocation of land is not a mechanism which makes builders build; understandably, they do so to the extent that it is financially beneficial to their companies. And as other responses have pointed out, experience in this District is that the rate of new building falls consistently and substantially short of the allocations and consents which the Planning Authority has given. So there is nothing evident in our experience to encourage the belief that the developers' contributions relied upon in the draft Plan will really be available, even in the 2040s.

But it is recognised that external (ie Government) funding will also be needed, and there should be no illusions about the likelihood of this. For most of the present century at least, the UK has been living through economic decline, masked for much of the time by underinvestment (or 'saving') on public services and on infrastructure maintenance and renewal. We are seeing the consequences of this now, and we shall be learning in the next few months just how fragile our social and economic structures are in this context. But in any case, the competition for resources will not abate.

Some may still see relief in 'growth' (which as the CCAP response says, in this context means 'economic growth for some'), and there is certainly a need for all available productive potential to be usefully employed. But there is no realistic prospect of national relief from any general increase in global prosperity, rather the reverse. Besides the costs of proactive global action on climate change (action which may perhaps not adequately happen – but if it doesn't, the consequences are incalculable, but certainly most dire), we have hardly, for example, seen the beginning of the population displacements which climate change will generate and of which the global costs are incalculable; even the (so far) limited war in the Ukraine is causing destruction of wealth on a global scale; and it is no longer possible for people in any corner of the earth to escape from consequences of global economic hardship.

So with respect, I don't think any UK Government in 2045 is likely to provide the top-up to any proceeds which may come from Canterbury's developers' contributions, which would be needed to build the by-pass.

In short, I support the Canterbury Society's call to extend the final period for the drafting of the Local Plan, for the reasons which they state, and particularly in order to include a better-articulated vision for the City of Canterbury; to eliminate the traffic/zoning-eastern by-pass scheme; to limit the allocations of housing land to the legal minimum; and to re-think the allocations of land for housing more radically if Michael Gove does get the 'prescribed' housing requirement changed to an 'advisory starting point.'

Denis Linfoot
Canterbury

13.01.2023