

## Canterbury District Local Plan 2045 consultation

### General

Since the government announcement in December 2022 that housing targets would be advisory rather than mandatory and that councils would be able to propose building fewer homes if they faced building at a density that would “significantly change the character of the area” the council needs to reconsider the Local Plan proposals. This reconsideration is needed in light of the government’s new approach to targets, the evidence of the impact of the last 10 years of development and of the council’s performance against the current targets which now means the council is having to consider planning applications on the basis of a presumption in favour of sustainable development.

There is no doubt that the addition of substantial housing estates in Beltinge/Hillborough, Thannington, Hersden etc has changed the character of those communities therefore the council needs to look again at the need for a new town which can have proper facilities and transport and infrastructure links to Canterbury and elsewhere. The present approach has created the traffic problems that the Canterbury Circulation Plan seeks to address. The new plan has a housing target of 1252 new dwellings each year that is 27,500 houses by the end of the plan period. This number is almost twice the number of houses Whitstable had in 2011 (15483 per Census2011). Census data indicates residents per dwelling at 2.34 so these new dwellings will generate a population of around 64,500 well above Canterbury city’s current population. Adding these numbers in big blocks of development-Mountfield, East Canterbury, South-west Canterbury, Brooklands Farm, Cooting Farm with the number of vehicles they will have (87% of households have at least one car) is not sustainable.

Canterbury’s performance against the Housing Delivery Test in recent years is

Period	Target	Delivered
2016/17- 2018/19	2275	1983
2018/19 -2020/21	2323	1509

As a result of this performance the council is now subject to the “presumption in favour of sustainable development” so the council is vulnerable to having to approve developments in areas it does not consider appropriate. With a new target of 1252 dwellings per year against the current 780 it seems the council is setting itself up to fail and so will always have to consider applications on the presumption in favour basis.

Given that Canterbury’s population density of 540 per km<sup>2</sup> is 106 people per km<sup>2</sup> higher than England’s 434 people per km<sup>2</sup> the council would seem to be able to make the case to government that its housing target should be lower.

The council also needs to recognise construction cost inflation which has become apparent after the plan preparation work started and the skills and labour shortages in the construction industry. The current targets combined with these labour shortages have already made it difficult for residents to get tradespeople to maintain and improve existing properties and they have made work more expensive. Expansion on the scale proposed will exacerbate this without plans and actions to address the labour and skills shortages in advance of building yet more houses.

The Financial Times reported on 22 July 2022 that electricity networks are near capacity ( and 3 London councils had to hold up development plans) Demand for EV charging, heat pumps and data

centres will place additional demands on local networks and this pressure does not take account of the near 50% increase in the target for new homes. The Environment Agency classes South East England as “water stressed” and the Broad Oak Reservoir proposal will not alter this until well into the life of the new plan. These further factors add to the case for lower housing targets. It is not axiomatic that continual growth in size is necessary to thrive. There are plenty of business examples that show this to be so.

#### Whitstable Proposals

In terms of particular areas and sites I confine my comments to Whitstable. As page 81 of the draft plan recognises traffic congestion and parking provision particularly in the summer months do detract from the character and environment of the town centre. There are concerns locally that the developments already approved and under consideration – 400 dwellings under construction at Whitstable Heights and 300 at Grasmere Pasture with work due to start on another 42 near Harrier Lodge care home this year will begin to see Whitstable suffering the same traffic issues as Canterbury. To add a further 2,000 dwellings at Brooklands, Court Lees, Golden Hill and Bodkin farm would bring Whitstable to a standstill and adversely impact its current attraction and success.

The Ancillary services proposed are rarely delivered, KCC generally takes contributions rather than build the new schools identified. The country has a shortage of GPs; Kent has the worst ratio of GP’s to residents in the country and according to the Chair of the Royal College of GP’s it takes ten years to train a G so that is a problem that will not be resolved quickly. The Plan seems to have been prepared regardless of these issues.

The proposed walking and cycling routes will do little to reduce car movements. The average property price in Chestfield at March 2021 was £579,000. Whoever develops Brooklands Farm will build dwellings at around this level. According to the 2011 Census 83% of Chestfield households had 2 or more cars so the 2000 dwellings could well have up to 4000 cars. It is likely there will be 2 earners in the properties and in their busy lives they are not going to walk and cycle for food shopping.

The plan says that bus routes will be proposed through these developments. Sadly there is currently little evidence of Stagecoach or anyone else running regular buses through such estates but maybe re-routing the road would achieve this for part of the site.

All that said, at the 2011 census Chestfield parish had 1346 dwellings of which 1112 were detached properties so a development of 1300 dwelling plus 250 at Bodkin farm would significantly change the character of the area and given the concession by government to reduce housing targets where this is the case the Brooklands farm site should be excluded from the Local Plan.

Whilst I have focused on the Brooklands farm site I believe similar concerns arise in the case of the South West and the East of Canterbury proposals.

#### Affordable Homes

In terms of the aim to provide high quality affordable homes for our communities I believe the council needs to look at increasing the number of socially rented homes that are provided within the “affordable homes” allocation and it needs to look at how it can protect these for Canterbury’s current residents.

#### Traffic

The Canterbury Circulation Plan needs a serious rethink. The growth in population and car numbers over the last 20 years has left Canterbury with undoubted traffic problems but to zone the city and have people drive in and out before going to another zone will do little to retain any viability of the city centre. In addition, with the disposal of 6 inner ring road car parks, it would have a seriously detrimental impact on the council's income from car parking which we have seen from the local paper makes a significant contribution to the council's general fund revenue budget.

The Plan proposes another Park and Ride site when the council has recently concluded the Sturry Road site is no longer viable.

#### New Homes Bonus

The council ought to take time to re-assess its Plan in light of the Government's consultation on changes to the basis for new homes bonus.

#### Conclusion

The Adopted Plan's outcomes over the last 10 years give sufficient evidence that adding to existing communities in large numbers is not a sustainable approach and this has seriously exacerbated Canterbury's traffic problems. Seeking continual growth in this way is not the way to improve the communities of Canterbury district. The council needs to look harder for a site for a new town if development has to be on the scale the draft plan indicates.

The draft plan looks as if it would create similar traffic problems in Whitstable which will detrimentally affect the viability and success of Whitstable.

The council should assess the electricity network and water resource capacity locally to determine the development constraints in the district.

The council should use the leeway given by the Government's new approach to housing targets to make the case for lower annual targets and should exclude the Brooklands farm site from its new Local Plan (together with other sites that would also substantially change the character of the area).

The council should be wary of accepting a housing target which it is unlikely to achieve and thereby make itself vulnerable to having to grant planning applications for sites it does not think appropriate.

The council should also assess the potential impact of New Homes bonus changes prior to finalising the plan.

The council should consider whether and how it can make its "Affordable homes" provision more securely geared towards social rented housing for current district residents.

The council needs to reconsider the Canterbury Circulation Plan in terms of its potential impact on the viability of the city centre and its impact on the council's own General Fund.

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