

An aerial photograph of a rural landscape. In the foreground, a large, golden-brown harvested field is scattered with numerous round hay bales. A paved road curves through the field on the left side. In the background, a dense line of green trees separates the field from a residential area with several houses. The sky is clear and blue, suggesting a bright, sunny day.

**DOES THIS LOCAL
PLAN WORK FOR
OUR RESIDENTS?**

CANTERBURY
LABOUR COUNCILLORS

Foreword

The Local Plan 2045 is more than a planning document, it should represent a vibrant vision of what our district could be in 20 years' time. A vision that is led by the people who live in the district and not developers looking to extract profit. The vision should be something that residents identify with and understand; something that appreciates and builds on what makes our area and its residents unique and protects the character of where we live.

It is fair to say that some of the proposals in this document are controversial. In contrast to previous iterations of the local plan, opposition councillors have not been involved in the drafting of the document and as such many of its most ambitious proposals are untested and have faced widespread public opposition.

We hope that whoever makes up the council post May 2023 are in listening mode. Our residents deserve a council working with, and not against, their interests.

Labour recognises that building houses, enhancing the environment and retaining our World Heritage Status is a difficult thing. We accept that any suggestions we make must be legally and practically deliverable and have entered into this response with that in mind. However, some issues are current and cannot wait two decades to solve - sequencing and forward planning to create solutions to resolve congestion and the impact of climate change are needed now.

Ensuring our historic World Heritage Site remains centre stage is critical in terms of our future and this should be a yardstick by which to measure these plans for development.

We thank officers for their hard work and appreciate the substantial steps taken on improving open space and environmental standards. Our approach is to focus on the key issues on which we believe the plan remains unsound and does not deliver a credible approach. We have sought to be constructive and provide alternative options where appropriate.

We believe the Canterbury City Council (CCC) Draft Local Plan 2045 fails to answer six big questions local residents are asking and our response is built around these issues.



**DO WE NEED
SO MANY HOMES?**

1. Do we need so many homes?

Residents are rightly concerned about the scale of house building proposed in this plan. Our infrastructure is already under strain and there remains several thousand homes to be built under the current Local Plan – this is before the numbers in this draft plan are even considered. We do need to build homes, doing nothing is not an option. However, the scale of house building proposed in some parts of the district is untenable.

In contrast to neighboring local authorities the geography of Canterbury district has always made development difficult. Two of our three population centres are coastal and Canterbury is enclosed by both the Stodmarsh SSSI and one of the [largest concentrations of ancient woodland in England](#). Its character is of a small cathedral town set in a green envelope.

The city of Canterbury's population has increased by almost [25 per cent since 2001 according to the Office for National Statistics](#), almost twice the national rate. The Edge Analytics report commissioned by CCC in 2021 suggests that the forecasted rate of growth by the ONS is unrealistic going forward. It predicts population [growth of eight per cent between 2023 and 2040](#), half that forecast by the ONS and on which this Local Plan is built.

The scale of housebuilding in this draft plan will disproportionately affect Canterbury city, taking into consideration homes already in the pipeline and those in the draft 2045 document we will see a [doubling of the population in Canterbury city](#) between 2000 and 2050 (although the increase for the district as a whole is more modest).

As of March 2021, [11 of 13 Kent councils](#) are also effectively being punished for failure to bring forward homes as agreed. In Canterbury, the council has only built 65 per cent of the homes it had promised, leading the central government to remove many of the reasons local residents could object. As of March 2020 there were more than [64,000 homes](#) with planning permission or allocated within an adopted Local Plan in Kent that remain unbuilt - that's enough houses to build another Maidstone.

New homes have to be built and we understand that central government targets play an important role in delivering affordable housing; however – it would seem that the market does not have confidence in the rate of population growth proposed by this government.

Unfortunately, the amount of new homes built in the district is [not in the control of the local authority](#). The figure is calculated, with the help of the Office for National Statistics, using a standard methodology which suggests population growth will be incrementally in line with previous increases and adding extra homes to areas where the affordability of housing is deteriorating (such as ours).

The [Secretary of State](#) has recently agreed to consult on changes and acknowledges that population projections are a guide that is not mandatory. The government has also dropped legislation seeking to make them so. The Secretary of State has also advised that local authorities can deviate from this figure where they can show evidence that the character of their area is at risk. This clarification reflects how a government may want to actively encourage development more fairly across the country under the Levelling Up Agenda.

However, we believe there are more pertinent questions. Where in the district can homes be most sustainably built? When are we expected to bring on so many homes? Has the council shown evidence that it has plans to maximize the use of brownfield sites and return under-utilised properties to local residents? We would always prefer to house residents in properties that already exist rather than build new ones.

In preparing their proposed plan Canterbury City Council consulted on six models for spatial distribution of housing across the district. [Two thirds of respondents \(65.8 per cent\) disagreed with the preferred option.](#)

[In deliberately picking an option not even considered](#), this plan also goes no way to explain why other proposals were ruled out of hand. When only 1 in 3 respondents disagreed with a new freestanding settlement why was it rejected?

While officers have made some indication that land was not available for this development, [press reports on the unwillingness of the land owner to sell land at Cootings Farm](#) (Policy R1) indicate that the viability of the current proposal may rely on compulsory purchase. We believe a more in-depth discussion and master planning of a site with Dover District Council may have presented another more credible option to house building which would retain the character of our urban towns and been able to leverage government funding for infrastructure. Development backed by additional resources and on greenfield sites would have offered additional viability and allowed us to demand substantively more affordable housing and higher environmental standards.

While consultation on a new development was offered, comments made by the Leader of the Council would suggest that Canterbury Circulation Plan was being openly discussed in 2020, however this was not the case and as such it has never properly been considered.

Following the decision to make targets optional, we would encourage council officers to reconsider their conclusions and prepare a case for reducing the figure before the document is finalised. Its new proposals could better utilise existing sites by:

- Reducing the prevalence of second homes. Plans brought forward in the draft local plan only seem to focus on reducing the overconcentration of short-term lets and not the total number of homes. [In 2008, HMRC data showed that 1 in 4 homes bought in the district were to be used as second homes](#).
- Considering increasing the density (where suitable) of its estate regeneration exercise.
- Actively encouraging the development of brownfield sites. There is no policy specifically on brownfield development and there is currently space for [548 properties on land identified in the councils brownfield site register](#) and without planning permission. Many large brownfield sites owned by the council are not put forward as strategic development sites or listed on this register.
- Actively reducing the number of empty homes. Sixty per cent of the empty local authority owned-homes in the county are in Canterbury (182). [One in every 31 suitable dwellings is currently vacant in the district](#). Kent County Council has a [partnership fund](#) to support districts compulsory purchasing such properties and help them to access interest-free loans to refurbish them.

We would consolidate the character of our town by using green belts as a means to prevent urban sprawl and protect our World Heritage Status.

We believe this council should:

- Take time to recalculate the housing numbers in light of possible Government changes to the relevant legislation, before finalising the plan for submission. Provide more detailed plans on the proposal for a new freestanding development or at least recognise that the next local plan will only find space outside of our three urban centres.
- Give a detailed breakdown of how a greenfield site, with government infrastructure support would affect the housing viability calculations, improving the amount of affordable housing and improving environmental standards further.
- Identify more brownfield sites, including those it already owns, that could be brought forward for development.

An aerial photograph of a large residential development, likely a housing estate, during the golden hour of sunset. The houses are densely packed, featuring a mix of brick and light-colored facades with red-tiled roofs. The sky is a gradient of blue and orange, with soft clouds on the horizon. In the background, a large body of water is visible. The overall scene is well-lit by the low sun, creating a warm, golden glow over the entire area.

**ARE THESE HOMES
AFFORDABLE?**

2. Are these homes affordable?

Canterbury's homes are not affordable to the vast majority of people who live here. The average cost of a new build dwelling in Canterbury has almost [doubled in 10 years](#) (£167,476 - £317,381). In 2011 house prices in Canterbury were 8.16 times earnings; now they stand at almost 13 times annual salaries (12.91). We believe the problem can only be solved by the council taking a more proactive role in developing housing itself.

Canterbury sits within the top [20 per cent](#) of least affordable local authorities in the country and [yet in six out of the last 10 years Canterbury City Council has not built a single council house](#). In 2019 the council also increased [average rents for new tenants](#) moving into a council house from £394 (the social rent) to £671 (an affordable rent - benchmarked at 80 per cent of the market rate).

The council took this decision to protect the Housing Revenue Account, which was being depleted annually by the cost associated with replacing properties lost through the government's right to buy scheme. However, a byproduct of this decision has been to effectively opt out of the council actively developing property, as its new rents are equal to housing associations who can do the same thing.

It has effectively adopted a model where a developer is expected to use a small proportion of its financial gain to build affordable homes for either rent (through a housing association) or discounted purchase. A model whose perverse logic means local authorities can not demand levels of affordable housing on sites where such a move would threaten the economic viability of the site and the economic viability of the overall plan – a plan that requires these properties to be built as a means for paying for other vital infrastructure including roads, schools and parkland.

Local authorities are expected to choose between demanding more affordable homes and better environmental standards because both cost money while developer profit margins are protected in law.

Labour believes that the assessment of Local Housing Need, which is key to establishing how many houses developers can be mandated to build, is currently wrong. This calculation uses both the real number of people in housing need (the numbers on our housing needs register) and a projection of how many people currently renting would like to own or buy their own house. The calculation uses outdated data on the level of housing need. The Viability Study for the local plan estimates we have [2,503 people](#) on our housing needs register in January 2021, despite evidence that there were 2,800 in October and recently reports that the [housing team have over six months of applications currently in their intray](#). It is therefore reasonable to expect that the number of people on our needs register is far higher than the one used to calculate the level (3,000+).

The calculation uses data about how many people want to be home owners is irrelevant when they cannot afford it. Whilst 59 per cent of private renters may aspire to become home owners in our latest Housing Market Needs Assessment, 34 per cent of newly forming households cannot afford the affordable rent levels in the market.

The plan has not modelled proposals to increase levels of affordable housing in 5 per cent increments or consider whether it could demand higher levels of housing on larger greenfield sites where it knows developers are going to make a larger return. It has not considered quotas for council housing on any of the sites nor explained why the Housing Needs Assessment of 70 per cent of the affordable housing quota cannot be met (the proposed plan proposes 66 per cent).

Of the 34 per cent of affordable housing which is identified for discounted purchase, the local plan gives no consideration to reducing the different types of products available despite evidence that they are not equally affordable. The Viability Plan acknowledges that 95 per cent of all residents would be unable to afford a property under a Help to Buy Equity Loan of 20 per cent, compared to only 32 per cent of residents who would be unable to afford a property purchased under Rent to Buy.

The Plan proposes to make 1 in 4 affordable homes built in this plan a "[First Home](#)" - the statutory minimum provision introduced, it appears, at the expense of affordable homes to rent. First Homes are a government backed

financial product which is only accessible to people with a local connection, is capped at £250,000 and, in contrast to other models, has to be sold on at a similar discount meaning that they remain affordable for longer. First Homes can be delivered up to 50 per cent of market rents yet are only modelled at 30 per cent.

This council should:

- Prepare the groundwork for the local authority to actively identifying its sites for housing development. The council would reap the uplift in land value by developing the plot and selling a proportion of the site off on the open market. It could develop property for rent by proposing property at Military Road is a strategic site for housing and all car parks redundant after the implementation of city centre measures. The plan for the Wincheap Industrial Estate should be reviewed to deliver more housing units and consider whether the circulation plan will jeopardise businesses on the estate.
- In parallel the council should independently set a 'Canterbury Rent' somewhere between the social rents and affordable rents and no higher than 30 per cent of lowest quartile earnings. [A 2021 study commissioned by the Local Government Association](#) shows how planning for the medium to long term, council housing delivers a good return on investment and substantially improves tenant health by moving them into better quality housing.
- Limit the modes for delivering affordable purchase to ones which prove a local connection – choosing to specifically focus resources on reducing the affordable housing problem of our own residents rather than providing discounted homes that others could purchase. This would involve:
 - Establishing quotas for key worker housing Rent to Buy on all larger housing sites. The risk to developers on these properties would be higher but negligible in a district where [almost 1 in 3 of the population work in either education or health/social care](#).
 - Establishing mandatory, rather than optional quotas, on all sites over 2,000 for self-build housing. [There is a need for 48 plots on our self build register and only 8 plots identified](#).
 - A presumption in favour of universities redeveloping existing accommodation, alongside new development as tied housing for faculty and workers.
 - Returning 70 per cent of the affordable housing to rent by excluding shared ownership models which will ultimately be used provided as financial packages to developers if they suffer from oversupply.
 - Modelling a market reduction of 35 per cent (not 30 percent) on First Homes located on larger greenfield sites which generate a higher return.
- Consider the provision of more emergency homeless accommodation in Canterbury – it is frankly unacceptable that families are often placed in unsuitable temporary accommodation miles from children's schools.

An aerial photograph of a road winding through a lush green landscape. The road is flanked by rows of trees, some of which are showing autumn colors. The surrounding area consists of rolling green hills and fields under a bright blue sky with scattered white clouds. A white text box is overlaid on the lower portion of the image, containing the text 'ARE MORE ROADS REALLY THE ANSWER?' in bold, black, uppercase letters.

**ARE MORE
ROADS REALLY THE
ANSWER?**

3. Are more roads really the answer?

Canterbury has a problem with traffic. The proposed local plan proposes that the solution to this is the introduction of a new Eastern Movement Corridor (Eastern By-pass) and the division of the town into five zones between which the majority of drivers are not going to be able to travel. Labour believes that new roads are not the solution and will only increase vehicle use and average journey times in a way that will harm the environment.

The model is based on Ghent's *circulatieplan*, which levies a €55 fine on any vehicle passing illegally through the zones in a deliberate effort to reduce the 40 per cent of journeys which, prior to its introduction, took place across the city. While both cities have historic cathedrals and infrastructure, Ghent has a population almost five times that of Canterbury and is spread over an area almost six times as large. In order to for its plan to succeed Ghent introduced an electric tram service, built one [car space outside the city for every 10](#) residents and planned for 30 per cent of all movements across the city to be done by bike. In contrast Canterbury has no such plans and an electric tram could not be built in our historic city.

The local plan argues that such a radical option is key to creating modal shift. The transport modelling that is used focusses entirely on motor vehicles without any reference to how the phasing out of the internal combustion engine could improve air quality nor how the plans for improving cycling and walking will impact transport choices.

The circulation plan has been met with almost complete disbelief by the public as zoning does not make sense to residents of the city. It is unworkable and seems to ignore the reality of life for people living here. It assumes key sites are located in the centre of the town, but prominent locations such as K&C hospital, supermarkets, the leisure centre and Riverside development, churches, doctors' surgeries, the sports grounds at the Spitfire Ground, Polo Farm, Canterbury Golf Club, and the University of Kent are not, and as such would require substantial round trips via the bypass.

We believe that the transport modelling in the paper is wrong and that its preference for bundling together the means to reduce congestion, makes it impossible to accurately identify the impact of each intervention. These interventions include proven solutions to reduce journeys introduced elsewhere such as car free zones, workplace car levies, subsidised park-and-ride and even a timed version of the existing Circulation Plan. The impact of reducing school journeys into the city by building schools on the coast has not been factored in. None of the models considers a far greater focus on public transport, for example, free park-and-ride and municipal hopper buses. The Transport Paper includes other options but the only ones tested relate to the location of housing developments and the car journeys they generate rather than to alternative transport models.

To date the council's encouragement of modal shift has been patchy. In fact, since 2017 it has mothballed park and ride (P+R) in Sturry and become more highly reliant financially on car parking revenues.

No timings or sequencing/phasing appears in this plan, a critical omission as it must be clear it cannot all happen in the year 2045, we need measures now to relieve congestion. Proven measures such as clean air zones, even if imposed only at peak times to even out demand, have not been considered as an immediate solution to lower the baseline rates.

We believe that the aims of the transport policy – regardless of how many homes are built or where – should be to:

- Create viable, safe, regular public transport and personal travel (walking/cycling etc.) options
- Create disincentives to travel by car – probably including raising parking charges significantly and possibly barring cars from some routes at some times to allow bus lanes to be installed etc.
- Effectively to penalise unwarranted car use (but allow legitimate blue badge holders to park conveniently and allow movement of emergency vehicles, commercial travel, freight)
- Put in place first the SWECO model and the walking and cycling implantation plan, then monitor and manage the consequent traffic flows.

We cannot do nothing and the [SWECO model does reduce the capacity for driving around the ring road but also remodels the network to reduce bottlenecks.](#)

We therefore propose that the following options should be modelled in an iterative fashion so as to understand the cumulative impacts.

Option 1: do nothing at all on transport, but add the planned housing numbers to create a baseline “worst case” for 2045 (this has already been done according to the Transport Topic Paper)

Option 2: Remove the Eastern By-pass:

- carry out the changes to the inner ring road per the SWECO report
- close all the car parks inside the inner ring except Whitefriars and Castle Street
- add the multi-storey on Holmans Meadow/Dover Street (but note that we are conscious that the council must find a solution for residents within the city centre to park conveniently)
- convert Queningate, Castle Row, North Lane and Northgate to freight transfer stations and P&R bus drop off points
- add planned P&R capacity (including Whitstable)
- add inner “hopper” bus services connecting those drop-offs plus East and West stations and Riverside
- put in place the cycling and walking implantation plan.

Option 3: option 2 plus:

- free P&R for registered residents of the district
- additional commercial bus services to connect routes around the city, especially to the K&C hospital; London Road estate; University of Kent; the outer retail hubs at Wincheap and Sturry Road; Thanington/Cockering Road and all the south Canterbury new housing estates planned to 2045
- bus services should run 364 days per year, minimum of 6.00am to 12.00 midnight, frequency to be minimum 10 minutes between 07.30 and 20.00, and 30 minutes outside those hours
- penalise (presumably by taxing) private commercial parking spaces (eg: at offices).

We believe that if we implement the options 2 & 3 alongside the SWECO report it would still have the effect of making journey times longer on the ring road, thus disincentivising travel into the city, without making it impossible. Given that the evidence is that only 13 per cent of vehicle movements on this road are for journeys through the city, implementing the SWECO proposals would enhance non-vehicle based travel options and the ambience of the area around the city walls, while also cutting traffic.

The Eastern By-pass would, on the present routing, cut into the Sturry Road Community Park, the edge of the SSSI and leave no buffer zone. We believe it would cause significant habitat damage here and in the wetlands near Alder Carr woods and in Trenley Park. The plans for widening the road through Rough Common have not been assessed adequately enough.

Labour believes that the whole system needs to be supported by a bus-first policy, implementing a hopper bus service round the city centre as a first step, supported by the safer walking and cycling implementation plan in full. Some of the infrastructure funding could be used to incentivise new bus companies by subsidising new hopper bus routes until they become more financially viable and to encourage lower fares leading to higher use. Some rat runs will need to be stopped as traffic from new developments will result in local neighbourhoods being swamped by cars, and the ANPR approach seems workable, limited to congestion hours, free movement outside these hours. We remain unconvinced that solutions that rely on the patchy and currently expensive bus network (i.e. the Whitstable Park and Bus) will work unless the council take a more active part in providing the service.

We would also like to see:

- Consideration of freight transport centres to reduce the use of heavy goods vehicles inside the final miles of any journey into the city centre.
- Strategic community led consultation in each of the three large population centres through supplemental planning documents. These consultations could identify rat runs and explore community support for low traffic neighbourhoods, residents parking and pavement parking bans. We should not be identifying problematic junctions through computer models and then proposing radical solutions which limit people's movement without speaking to them first.
- Greater consideration of how we could build 'healthy high streets' actively considering inclusive design features which make them more accessible, reduce crime and making people feel safer. The Canterbury Community Safety Partnership is concerned about violence against women and girls particularly at night.



**JUST HOW GREEN
IS THIS PLAN?**

4. Just how green is the plan?

This new plan brings in welcome new environmental standards on housing development but if the plan is to meet the urgency underpinning our climate emergency it must go further and faster.

[Building the government's proposed 300,000 homes a year would blow the country's entire carbon budget until 2050](#). It takes 50 tonnes of carbon to build an [average UK house](#) which is why we need to be careful in how many we build. Where housing is essential it must be substantially more energy efficient, generate biodiversity net gain, and not overwhelm our ageing infrastructure.

The draft local plan only imposes rigorous environmental conditions on housing sites of over fifteen homes. It says that sites larger than fifteen homes should be built to achieve a net zero carbon emissions standard and deliver a biodiversity net gain of 20 per cent (which actively discourages development of Grade 1 agricultural land). It sets standards for new homes to be designed to use 90 litres of water for day (the current average is 140 litres) and provide plans to prevent surface run off flows which will cause the overwhelming of our sewage network and pollution of our seas.

Environmental protections are very well covered in SS1 Environmental Strategy including provision of new open spaces, protection of habitats and valued landscapes, the full recovery of the Stodmarsh Nature Reserve, the delivery of 20% biodiversity net gain, 20% Tree & Hedgerow cover for new development across the district together with the promotion of the Stour Valley Regional Park. Much more of the detail is in the Tree and Open Space Strategies. As with many of the strategic approaches the issue is delivery.

We believe the council needs:

- Clearer constraints on developers with less opt outs. Throughout the Plan developers are offered ways of opting-out of their site specific obligations for, as an example, biodiversity net gain or green space provision. This is usually achieved by off-setting or off-siting the requirements. We think this is an inappropriate solution. If sites cannot meet the viability or feasibility requirements for these mitigations and enhancements within the site then in our view the site should not be developed. Biodiversity gain in particular cannot possibly be achieved through environmental enhancements elsewhere since by definition diversity of species requires diversity of habitat.
- Where funds are allocated to Carbon Reduction Fund, we think these funds should have a clear and specific purpose, for example the retrofitting of existing council housing. [58% of homes in Canterbury don't meet energy efficiency standards, pushing fuel bills higher](#).
- Higher standards on smaller sites (those below 15 homes). We would welcome that these deliver carbon efficiency 30 per cent below the mandatory building standards ensuring that standards for their delivery will remain relevant throughout the life of this plan and encourage early development. Tree cover should be set at 20 per cent of all developments rather than just those developments of more than 300 homes.
- Clearer guidance for developers on water quality – technical guidance given as to how surface run off rates should be measured. All Sustainable Drainage Plans must be up to date with [CIRIA SuDS](#)

[Guidance](#) and include a management and maintenance plan which has had public consultation and evidence of agreement of adoption or management company supplied.

- Independent and credible monitoring of surface run off and phosphate levels (particularly near Stodmarsh SSSI) should be set in development plans and be reported to planning departments. Construction and drainage plans should include details of how they will deal with surface flow through construction.
- While historically developers have overloaded our sewage system before a water company has taken steps to update the system, we believe restrictive '[Grampian' conditions](#) should be added to all developers to make sure that water companies can cope with the additional load through municipal (not private) systems. We believe new standards should be set to prevent tankering of sewage off site during development. Non-residential developments should be required to achieve full credits for category [Wat 01 of BREAM](#).
- Better Air Quality standards. All new commercial and residential buildings must minimise sources of indoor air pollution. Major developments in Air Quality Management Areas must be Air Quality Neutral and demonstrate the air quality impact on the local population has been mitigated. Construction Environment Management Plans on all sites must include standards around the cleanliness of generators, site vehicles, dust management and retention of soils.
- Clearer language in the plan. There are several references to Garden City principles but in no location are they explained. The principles of the original garden city principles by Ebenezer Howard included community ownership of assets, jobs within the city, higher proportions of open space including green belt, tree lined streets, biodiverse public parks, places for residents to grow food. The scale of food growing opportunities should be defined in relation to the scale of development.
- A supplemental planning document (SPD) on green construction methods which could summarise the proposed solutions but also actively encourage the inclusion of materials that actively sequester carbon, orientation of buildings to maximise solar gain, disincentivizing of fossil fuel heating systems and encouragement of construction models which conserve resources and eliminate waste.
- This SPD should establish standards to future proof recycling in the district, including adequate space to store recycling bins or access to communal bin stores our crews can access. It should consider the use of hedgerows rather than fencing and encourage pollinator corridors - thorough species surveys should be carried out on all sites to identify protected and notable species.
- A more strategic approach to funding formal open space. Access to open space needs to be a right for residents but the status quo sees developers build open space within a site whilst existing park lands struggle for funding. Parks and recreational services are then funded by a developer for 15 years before deteriorating and becoming the responsibility of the council. [Friends of the Earth](#)

calculate that seven of the 19 neighbourhoods in Canterbury are deprived of the gardens and parks needed to improve the health of their residents.

- We would recommend that on all sites over 300 homes an endowment is made by the developer to the council. This endowment is an up-front cost equal to what the developer would have spent on maintaining the site over the 15 years but also provides a means by which the council can make a profit on the interest of such endowment to fund future works beyond the 15-year timescale – this would mitigate some of the pressure on existing budgets and encourage the council to be involved in the early planning of open space to ensure it complements existing play park provision and formal playing pitches can meet emerging local need.
- We disagree with the proposal to construct the Eastern By-pass as we believe that it will sever ecological connectivity between the Old Park & Chequers Wood SSSI and the Stodmarsh SSSI / Ramsar site, both of which form an integral part of the ‘Lower Stour Wetlands Biodiversity Opportunity Area’ as outlined in the Canterbury Landscape Character Assessment and Biodiversity Appraisal. Rather than severing ecological connectivity between the two SSSIs, the Local Plan should be enhancing green and blue infrastructure in the area in order to ensure the successful establishment of a Local Nature Recovery Network and facilitate the creation of a Stour Valley Regional Park.
- More joined up planning for Open Spaces. Given the strategic importance of the Old Park & Chequers Wood SSSI (classified as G1) in the Lower Stour Wetlands Biodiversity Opportunity Area, we believe that the SSSI should be safeguarded in its entirety for biodiversity net gain, including its buffer zones. Old Park, Chequers, Timpson and Realm Woods site is an area of excellent mosaic habitat giving amenity green space to the densely packed estates of Northgate and Barton wards. This is also meeting criteria under policies in relation to Noise Pollution and Tranquility, Light pollution and Dark Skies and habitats of national importance and landscape character.
- The plan seems to want to increase green space but as a mosaic of green wedges rather than a concerted plan for green belts to prevent urban sprawl particularly in Herne Bay and Whitstable. Green spaces are not as linked in as they could be, vague lines on site specific plans show buffer zones, it would be better to consider a network from the Stour Valley to Coastal Promenades, parks and gardens. Buffer lines could be replaced by the need to provide village greens in all large developments.
- Developers should be encouraged to protect green space in their plan as a Field in Trust, actively encouraging local residents to be involved in the management of the land.
- Clearer guidance on our World Heritage status. Heritage and culture issues are too briefly addressed in policy DS26 but are critical to the character of the city in particular (but not exclusively) and to the district’s economy. There should be much more emphasis on how physical development – both housing and the universities – and economic development are linked with heritage and cultural assets and with tourism development.



**IS THE PLAN
GOOD FOR JOBS?**

4. Is the plan good for jobs?

The Local Plan doesn't adequately reflect what the economy of Canterbury is likely to be in twenty years time and doesn't adequately consider what type of businesses we may want to stimulate and support. The plan highlights how we can establish the accommodation which fits our current business need but fails to consider actively supporting emerging industries.

The [Economic and Development Study](#) behind this paper was commissioned during the Covid pandemic and at a time of considerable uncertainty for many of our largest employers. International visitors to the South East have been contracting since the Brexit vote in 2016 and [Visit Britain](#) is forecasting tourist numbers will not return to pre-pandemic levels until 2025. Jobs in education account for almost 1 in every 10 jobs at a time when university intake has dropped, and our largest institutions have [publicly posted large losses](#). The update to the economic study [commissioned by the council](#) did not consider how the dependency of the district on these industries may lead to longer term scarring from Covid-19.

Faced with financial losses of its own, this council has taken the decision to actively disinvest in many of the festivals listed in the paper as supporting the economy in our area and to close its Tourist Development Teams.

Between 2001 and 2019 Canterbury lost approximately 10 per cent of its industrial floorspace and 15 per cent of its office floorspace – considerably above the national average.

Changes to residential classes, introduced after these reports, mean that at a time of economic recession there may be a real risk of losing retail floorspace to residential [unless plans are put in place for targeted economic regeneration](#) of each of our three large population centres.

The plans for Whitstable and Herne Bay in the current plan are aspiration-led but need additional scoping if they are to identify more potential sites which can anchor them in regeneration.

Since the study, the planned economic regeneration of Beach Street, Herne Bay has been shelved. The plan for Herne Bay High Street seems not to consider Mortimer Street and does not include the pier which is an emerging tourist destination. Mortimer is the town's de facto High Street and should remain so.

In Whitstable, we welcome the way in which a supplemental planning document for Whitstable Harbour could see the council actively engage in placemaking but there is a fear that unless a wider exercise is undertaken new development will simply drive trade and investment away from away from the High Street. This area identified for this document should also encompass all of the Harbour Estate and adjoining municipal buildings to the Gorrell Tank Car Park.

In Canterbury vacant shop fronts are a common sight that is not simply explained by the wider transition of high streets from retail to leisure. The city council's strategic interventions to refurbish St George's Street and submit a [Levelling Up](#) bid for the city are not commented on. If the Levelling Up Bids for either Herne Bay seafront or Canterbury fail we need a plan.

Elsewhere, the current local plan establishes a hierarchy of development that highlights the identity and value of many of our [local centres](#) (Wincheap, Tankerton, Beltinge, Seasalter) without considering how these can be actively supported by community facilities to thrive. Proposals to transfer up to 15 per cent of Section 106 contributions to parish councils are of little benefit to unparished areas unless there is a plan to actively [establish community facilities](#) in these areas using council-owned space.

For many people, the lack of placemaking in this plan is a real concern. We cannot see every ‘community building’ on large sites filled by small supermarkets.

Much of the local plan seems to support existing business allowing for the largely unfettered development of the University on its own site and allowing the expansion of existing light industrial employment space where it already exists. Much of this is legitimised by the survey results which show businesses wish to relocate close to their existing site but there is no reference to the fact that four in 10 businesses quit their premises because they can no longer afford it.

The local plan fails to consider the economy of 2050 and strategic opportunities identified within its own study including the fact that:

- Self employment figures in the district remained above the national average during the pandemic. In 2019, [17 per cent of our workforce was self-employed compared to 10 per cent in the UK as a whole.](#)
- Creative industries in Kent and Canterbury are growing – despite being largely limited at present to repair services. Our position within the [Thames Estuary Production Corridor](#) provides us with a real opportunity to grow the arts and creative media.
- A growth in experiential and activity-based tourism could support some of our high streets and diversify our offer. Despite high levels of employment in the knowledge economy, Canterbury has one of the lowest [median weekly wages in Kent](#) reflecting its dependence on hospitality and leisure.

We agree with the need to better regulate AirBnB accommodation outside of the city centre, there seems to be no consideration how plans to prevent over saturation in certain areas may jeopardise bed spaces in the short term. Outside of Canterbury there are five AirBnB beds for every hotel bed and no plans, in this local plan, to encourage further hotel building.

This council should:

- Develop a clear set of expectations for each rung of its settlement hierarchy and provide clearer guidance on how the Circulation Plan will affect the economic viability of current employment spaces, particularly Wincheap and Sturry Road.
- Review the provision of existing employment space and specifically the provision close to any new development in Adisham.
- Prioritise the development of a science park at the University of Kent and on council-owned brownfield sites with Canterbury Christchurch which could use university-led research to support small to medium-sized businesses and industrial piloting of ideas.
- Better define what is meant by “oversaturation” in the limits placed on short-term rental accommodation and provide clarity to residents and model how this would impact tourism in specific areas.
- Put forward a Community Asset Transfer Policy which can ensure community facilities across the district, or at least map community facilities outside of parished areas and identify whether they can benefit financially from section 106 contributions.
- Create three distinct Supplemental Planning Documents for Canterbury High Street, Herne Bay Sea Front and Whitstable Harbour to lead on economic regeneration and allow for future scoping of sites. The plan for Whitstable, for example, identifies only the harbour as a potential development site, in what will feel quite detached from the High Street. It could explore the provision of light industrial and maker-led units on Whitstable Harbour to deal with the shortfall in units in the area. Supplemental Planning Documents in the three urban centres might allow a level of public scrutiny and engagement in urban regeneration which has historically been lost by our two-tier local

authority structure. It would allow an honest discussion about the problems relating to residential parking, public transport routing, industrial deliveries to high streets, protection of green space in our towns and how local authority assets could be better utilised. The vision presented in the local plan for Whitstable and Herne Bay focuses almost entirely on preservation and not on remodeling and preparing both centres for the new economy.

- Remove opt outs whereby developers extending existing business parks don't need to guarantee super-fast broadband and improvements in energy efficiency.
- Establish a new policy on a proportion of new industrial units being available for a subsidised affordable rent to microbusiness and the self-employed.

An aerial photograph of a coastal town, likely in the UK, showing a dense residential area with many houses. In the foreground, there is a railway station with several blue and yellow trains. To the left, there is a large industrial or storage area with many trucks and containers. The town extends to the sea in the background. A large white banner with black text is overlaid on the bottom half of the image.

**IS THE LOCAL PLAN
DELIVERABLE?**

5. Is the local plan deliverable?

The required number of houses to build this plan is double anything which has been achieved over the last 10 years. The level of coordinated master planning needed to build new ring roads, deliver the infrastructure available for modal shifts and actively sequence the development of schools elsewhere in the district to reduce the total number of journeys into Canterbury at the right time is immense.

The [Infrastructure Development Plan](#) attached to this document goes some way to justify why the council can feel that its request, particularly of Kent County Council, is linked to their strategic priorities but does not provide any independent assessment as to whether the funds exist. This problem is also particularly pertinent when considering commercial providers such as bus operators which have no statutory compulsion to engage and yet are referenced in both the Whitstable Park and Bus service and policies relating to the sustainability of communities and provision of tourist employment spaces.

If the Circulation Plan is delivered, it is clear that the new roads around Canterbury need to be built first and that if the full number of projected homes isn't built, there may need to be a massive amount of borrowing against future Section 106 contributions and CIL contributions which is unacceptably risky for either the city or county council.

Inversely the practice of triggering the building of on-site infrastructure (shops, water treatment services and schools) based on the number of houses completed – provides opportunities for developers to halt or pause building thereby putting undue stress on other services and threatening provision of affordable housing. Whilst we appreciate that the viability of sites may be threatened by changes to market conditions, changes in building costs and additional infrastructure – residents do not want to see developers use these as excuses for them to wriggle out of their promises to deliver affordable housing.

The draft local plan has, to date, not felt a joined-up process. Opposition councillors were excluded from many of the detailed conversations, particularly in relation to the Circulation Plan, where they could have offered a constructive challenge. Town Centre Consultations occurred only online, during the working day and in the midst of the pandemic excluding many traders. Officers at Kent County Council complain that they have not been consulted widely and questions in council relating to the factual accuracy of data in some of its associated plans have been ignored. The Dover District plan does not reference future developments to the west of the district.

We want to see an evidence-based approach to decisions and to date it seems that the evidence provided (particularly in traffic models and housing viability assessments) is constrained and does not allow for a more nuanced discussion of the problem than the proposal submitted in the draft plan.

For many people, this plan will be seen as a blank cheque to developers that promotes higher standards but also uses a raft of imprecise language that remains unexplained. Demands for higher standards need to either be non-negotiable or include detailed exclusions that can be tested.

The plan presents no reason why several major sites which are contiguous (for example south of Littlebourne Road, Hoath Farm/Bekesbourne Lane and Canterbury Golf Club; the two sites south of the Thanet Way, the two sites at Kingsdown Park) and – are treated as separate developments when in fact their impact is as a single growth area and should be sequenced as such. Our experience from handling larger strategic sites (i.e. Mountfield Park) is that continued engagement by councillors throughout a process can ensure greater adherence to emerging and developing building and environmental standards.

This council should:

- Merge adjacent sites in this plan to allow for a more strategic planning.
- Secure written assurances on Stagecoach (or build in to the S106 and CIL contributions to support new companies set up hopper buses etc.) as to the delivery of the Whitstable Park and Bus and Hopper services across the city of Canterbury; alternatively costing the delivery of these services independently by themselves.
- Provide detailed assurances as to the sequencing and financing of road and school infrastructure. Who will pay and what assurances do we have?
- Add detail as to how any developers' requests to change the conditions of their provision of housing may be considered.
- Commit to forcing developers to releasing affordable housing at an even rate to the release of private housing on strategic sites with a penalty for failing to do so.
- Explain why the trigger for tree cover and community facilities seems to be 300 and does not consider the location or accessibility of a site.
- Commit to the use of [Grampian conditions on strategic sites](#) which preclude the implementation of development permitted by planning permission until work undertaken by a 3rd party particularly highway improvements and sewage infrastructure.
- Remove imprecise language in the draft – use the term “must” or “may” rather than “should”, use “will be considered” rather than “will be supported” to avoid predetermination and explain Garden City Principles in detail.

Conclusion

Given the lack of involvement of the opposition councillors much of the main modelling in the Local Plan 2045 has not come under the scrutiny that would have built in a reality check on some of the more contentious ideas before it was put out for consultation. The process was not joined up and has lacked oversight from the Labour group, consequently we have needed to question some underlying assumptions.

Initial modelling of the transport solutions is constrained by the data available from KCC, limited as it is by being based purely on car movements. There appear to be no attempts to take the approach of creating transport solutions involving bus, cycling and walking infrastructure first. This severely drives certain types of solutions in favour of, for example, by-passes. We propose the opposite.

Zoning as outlined in this plan does not make sense for the people who live in the city, this model has caused most of the focus to be diverted towards this and has reduced serious consideration of and credibility for the Local Plan 2045.

Housing numbers and where they are sited should be reviewed in the light of the new approaches from the government, but we do need more housing in this district that meets the needs of our residents in terms of affordability and accessibility. We have posed some options to address this substantial problem.

A stand-alone garden city, developed together with a nearby district was, we think, an idea abandoned too soon, but could be a platform to be worked up within the lifespan of this Local Plan.

Open Space provision will be better as a result of the strategic approach in this plan, but we do need to make sure current residents have the same quality of open space as those in new developments.

We welcome any further clarification or discussion on our response to the local plan via email. You will find our details at www.canterburylabourcouncillors.co.uk.