



## A response to the Canterbury District Local Plan 2045

### Submission from the Canterbury Sustainable Development Goals Forum

This submission to the consultation on the draft Local Plan is from the Canterbury SDG Forum. We think it important to consider the Local Plan in a larger context and assess its proposals against the needs of an increasingly interdependent world. We recommend that the objectives in the Local Plan, when finally agreed, should be mapped against the Sustainable Development Goals and their specific targets, perhaps using the ONS SDG open software.

In this submission we have identified those policies in the draft Plan which we see as supporting and promoting the global goals, and those which we see as being in conflict with them.

#### **SDG 1: End poverty in all its forms everywhere & (SDGs 2 Zero Hunger & 3 Health and Wellbeing).**

Tackling poverty is largely dependent on national policies, but a particular dimension of poverty amenable to local action is the difficulty experienced by so many people in accessing affordable housing, especially those in real poverty. The Canterbury SDG Forum has just produced a Report on poverty in the district, which emphasises that among the causes of poverty, “Housing is a central issue, partly because the cost of housing is often the cause of people living in poverty and also because poorer people are likely to end up in sub-standard accommodation or become homeless.” The difficulty of accessing affordable housing often exacerbates people’s debt problems, which are in turn a major cause of stress, anxiety, and mental health problems Council housing is often people’s only recourse, but our Report notes that “The numbers of households on the local authority waiting list have increased dramatically in recent years. In Canterbury the numbers of households waiting to be housed was 1983 in 2019, 2547 in 2021 and 2809 in 2022.”

We therefore support the proposal in Policy DS1 that 30 per cent of all new major developments should be affordable housing. However, as our Report notes, this is only a target, and “its attainment is subject to a number of factors, including other social needs, such as schools, and highways, and developer profitability.” Furthermore it is important that housing should be genuinely affordable, not just in the technical sense. We therefore urge that there should be a greater emphasis in Policy DS1 on the provision of social housing at affordable rents.

#### **SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.**

*Target 11.1 By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums.*

We repeat our comment in relation to SDG1 about providing support for those in poverty by meeting the need for genuinely affordable housing including social housing.

We welcome the commitment in Policy DS6 to minimise the carbon footprint of new residential and commercial development in the district, and to maximise the water efficiency of new residential development. We emphasise the necessity for all new housing to be built with maximum insulation, solar panels and electric charging, and for a definite and accountable long term environmentally appropriate strategy for wastewater and sewage.

*Target 11.2 By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.*

We support the objectives of the transport policies in the draft Plan, including the objective of improving public transport, and the commitment to the Movement Hierarchy in Policy DS13. However, we strongly disagree with the proposal to achieve these objectives through the draconian Canterbury Circulation Plan. The sectorisation proposal for Canterbury will disadvantage those groups which are identified in SDG11.2 as being especially vulnerable, including women whose concern for safety may make them reluctant to walk or use public transport at night, families with children, people with disabilities, and older people who may not be registered disabled but have mobility problems. All these groups are likely to need to resort either to car travel or specialist shared transport at certain times and the proposed policy would make this difficult for them.

### **SDG 12: Ensure sustainable consumption and production patterns.**

We support the commitment to a circular economy in Policy DM4.

### **SDG 13: Take urgent action to combat climate change and its impacts.**

We welcome the commitment in the Strategic Objectives of the Plan to “Reduce the causes of climate change and adapt to ensure that all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.” We support the commitment in a number of the policies “to address climate change by reducing car dependency”. We agree in principle with the requirement in Policy SS2 that all new developments should be zero carbon, but we do not agree that ‘net zero’ is an acceptable standard, because by allowing offsets it lets everyone off the hook.

However, we agree with the submission from Canterbury Climate Action Partnership that the targets for the amount of housing development and the proposal for creating an eastern movement corridor will add very substantially to carbon emissions, both from the process of construction and from the increased and longer journeys which will be an inevitable consequence. We therefore disagree strongly with Policy SS3 Development Strategy for the District and with Policy SS4 Movement and Transportation Strategy for the District.

### **SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.**

We welcome the Environmental Strategy for the district in Policy SS1, and Policy DS21 on Supporting Biodiversity Recovery. However, the amount of development proposed for greenfield sites will have a significant negative impact on terrestrial ecosystems, as is acknowledged in the Sustainability Appraisal, and the proposed eastern movement corridor will have a serious impact both on the buffer zone which is essential for the Old Park & Chequers Wood SSSI, and on Trenley Park Woods. We urge that those policies should be reconsidered and that alternatives should be adopted in order to make the whole of the Local Plan genuinely sustainable.

### **The UN Sustainable Development Goals 2030**

We repeat our suggestion above that the objectives in the Local Plan, when finally agreed, should be mapped against the Sustainable Development Goals and their specific targets, perhaps using the ONS SDG open software. This would then make it possible to undertake a Local Voluntary Review and monitor progress towards the goals on an annual basis, as recommended by the United Nations (<https://sdgs.un.org/topics/voluntary-local-reviews>). We believe that the urgency of effecting the changes needed for environmental and social sustainability requires the coordination of planning at all levels, local and regional and national.