



CCC Consultations <consultations@canterbury.gov.uk>

Draft Canterbury District Local Plan to 2045

1 message

Keith Bothwell [REDACTED]
To: consultations@canterbury.gov.uk

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To whom it may concern

The Draft Canterbury District Local Plan to 2045 contains a number of laudable policies, including aims for sustainable design, economic resilience and biodiversity gains. However, when seen in the context of the overall strategy for building 31,000 new houses on a set of disconnected sites in a city whose transport, water and drainage infrastructure is already failing, these policy aims become effectively meaningless and unacheiveable.

The key overriding issue is that Canterbury has already been developed beyond its capacity to effectively service the current number of dwellings in terms of its roads, public transport, sewage capacity and fresh water supply.

Most of the sites identified for development in this draft local plan are dotted around the outskirts of the already-developed urban area, with no clear strategy for how they connect with each other or to the existing infrastructure. In other words, they are just the 'empty' sites that are left over. There is no rationale for why these particular sites should be developed.

What is needed instead is a professionally produced masterplan, starting by clearly identifying local needs and opportunities — in consultation with local communities — and then developing strategies for meeting those needs and creating those opportunities, rather than being led by housing numbers and bypass schemes. Greenways, which are mentioned in the Plan, could be the starting point for developing a coherent and appropriate masterplan — linking communities and green spaces together with safe foot and cycle paths along pleasant biodiverse routes. The sustainable infrastructure should be the prime generator of the masterplan, not road schemes that will just encourage more vehicle traffic.

The housing demand needs to be proven, rather than based on formulae using outdated data. Moreover, in view of the impending review by the Secretary of State Michael Gove, the Local Plan should be put on hold until he deliberates. If there is the demand, a much more appropriate solution would be to build a new garden city — of a minimum critical mass in terms of dwelling numbers — to provide nearly all of the new housing, at a location with strong rail and road links away from Canterbury and the other towns, such as at Aylesham/Adisham.

Policies aiming for 'net zero' carbon are not acceptable. The aim should be simply 'zero carbon'. 'Net zero' standards and S106 agreements allow for offsetting those carbon emissions that are difficult to avoid and are basically a let-out clause enabling developers and others to find the low hanging fruit only, and not tackle those carbon emissions that are difficult to avoid. 'Net zero' standards will not get us to where we need to be in 2025, or 2030 let alone in 2050.

The building energy standards are welcomed in principle, but the standard should be Zero Carbon, not net zero. However, SAP and BREEAM are not suitable standards as they do not model energy use and carbon emissions accurately. The Passivhaus or equivalent standards should be upheld.

The so-called 'vision' for Canterbury is generalised and disappointing. The vision should be much more ambitious and specific, identifying key areas where Canterbury might develop some unique attributes. For example, the district could become a regional or national centre for retrofit skills training, for food resilience, and a centre of excellence for zero-carbon businesses... it might become a model for a city with clean air where walking, cycling and excellent public transport are the norm.

Best regards

Keith Bothwell

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[REDACTED]

