

COMMENTS ON CANTERBURY CITY COUNCIL DRAFT LOCAL PLAN 2045

By Oaten Hill and South Canterbury Association
and Canterbury Heritage Design Forum

January 16 2023



CCC Map – results of SLAA call for sites (shown in blue)

OATEN HILL AND SOUTH CANTERBURY ASSOCIATION

We submit our response to the Draft Local Plan 2045, issued by Canterbury City Council for consultation.

We are unable to endorse this Plan for the reasons set out below, which cover both the actual proposals made in the Plan, and the processes described in the making of the Plan in the supporting documents.

In essence, we see that the Council, with the strong backing of Kent County Council, have adopted a car and developer driven scheme for massive growth of the city that seeks to propel Canterbury into a position of pre-eminence in East Kent. This is clearly driven by the assumption that bigger is better, and by uncritical acceptance of government housing targets.

The chosen development outcome is not arrived at by broad public consultations to discover the actual needs of Canterbury and its residents, and the design solutions are not supported by rational analysis and review of a full range of possible options.

The destructive impact on the city of building 31,000 houses is not objectively reviewed, financing of the proposed scheme is not robustly tested, and alternatives are not considered.

We suggest the Council bear in mind the basic maxim – ***that sustainable development consists of meeting the needs of the present without compromising the ability of future generations to meet their own needs*** .(NPPF)

We believe it is also the case that new communities should not be created at the expense of existing communities.

We strongly urge the Council to act on our suggestion to Pause the Plan, while a new NPPF is consulted upon, and to use the time to reconsider.

Tim Carlyle 16 January 2023, for OHSCA.

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Section 1 Overall Requirements – NPPF Legal Basis for Local Plans and Deadlines

1.1 Timetable, Impacts of failure to adopt a Plan

Like most planning issues, the requirement for an up to date Plan comes from the NPPF (National Planning Policy Framework) – current version is 2021.

All Plans must be compliant with the current NPPF

Plans must have a minimum valid period remaining of 20 yrs, and be up to date, for which reason they must be reviewed every 5 years.

The CCC 2017 Plan thus requires re-issue in 2022.

If the Plan is not current, its spatial plan defining what are developable areas no longer applies and developers are able to gain permissions for sites outside the spatial plan schedule.

1. NPPF key provisions – the background

Below, we quote what we take to be the key parameters as set out in the 2021 NPPF. Just before submitting this response, DLUCH issued a consultation on a revision to the NPPF, which is discussed below.

such adverse impacts may include situations where meeting need in full would mean building at densities significantly out of character with the existing area⁸ ;

Para 7 The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

To this we would add – we should only support development if new opportunities or communities are not created at the expense of either existing communities, or future communities.

It is a crucial part of the NPPF system that multiple aspects of development should be considered simultaneously, and that it is recognised that not all aspects of development are benign:

Para 8 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and

future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

This is developed in Section 11 which starts off with a bald statement (our added emphases)

*Plans and decisions should apply **a presumption in favour of sustainable development.***

But then goes on to consider better and worse aspects of plan making

For plan-making this means that:

*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; **align growth and infrastructure**; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

*b) strategic policies should, **as a minimum**, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

*i. the application of policies in this Framework that **protect areas or assets of particular importance** provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

*ii. **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits**, when assessed against the policies in this Framework taken as a whole.*

1.3 NPPF Legal Tests for Plans

NPPF says they must be

a) Positively prepared

– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed need; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified

– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective

– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent

with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.4 What are the Plan deliverables?

Before testing the Plan against these criteria, we need to note **what are the deliverables** of this Plan, as defined by CCC. in case it is not clear from other sources.

There are two fundamental outputs for the Plan

1 that a government defined housing target for new dwellings is met – 31,300 dwellings. This is at building at a rate of 1125 dw per year, as opposed to the 2017 Plan target of 800 dw per year

2 that developer contributions related to the new dwellings are large enough to pay for all the infrastructure required to service the developments, and ongoing local services costs, without requiring the government to increase its local authority support grant.

But a **third target** has been adopted by CCC and KCC in their joint assessment of Canterbury city traffic problems.

3 that past development in Canterbury city has been such that congestion has now increased to a critical level on Canterbury's ring road, and they believe a major scheme, to divert traffic onto a new road network is needed to bring about a significant reduction in congestion, and to make space for low-carbon active travel (walking, cycling)

1.5 Positively Prepared?

As below, we question the methodology for determining the **objectively assessed need** in relation to the calculation of future growth of households.

In regard to **joint working**, it is claimed by CCC that they can source from within CCC district enough land to deliver the 31,100 dwellings without requiring Thanet, Dover or Ashford councils to take on part of the quota. However, we understand that they are now in dispute with Dover DC because one of the important sites in delivering 1500 dwellings is Cooting Farm in Aylsham, adjoining the boundary to Dover DC, and that new settlement will require infrastructure servicing by Dover DC, who have not been involved in the process to date and thus are not projected to benefit from financial contributions.

1.6 Justified?

A significant legal case in planning history concerns the disposal of development land by Wednesbury Council, in which it was found

(i) that the council had not given consideration to any alternative options in determining possible options for the transfer of the land to their preferred developers eg obtaining several tenders

(ii) that alternative options had therefore not been quantified or assessed in a way that a reasonable council would have done.

CCC of course have investigated a range of options, and as noted below, do give quantitative and qualitative appraisals of these. But we believe that the range is artificially constrained to concentrate on preferred large scale road building options, and further, that **costing these under a realistic and robust range of possible scenarios has not been carried out.**

1.7 Effective?

Is the Plan deliverable, with effective joint working with other LPAs?

In our opinion, no.

As noted above, testing the viability of individual scenarios has not been adequately done,

eg consideration of housing market volatility, robust index-linked costings, inclusion of a genuinely full spectrum of scenarios including those that take account of developing policy and technologies, and unintended consequences. There would thus be significant financial risks, of an order of magnitude that could clearly significantly threaten the well being or even viability of the city.

The current estimate given in the DLP for various road-related works is £234Mn.

As above, there has reportedly been non proper joint working with Dover DC on the infrastructure impacts of the proposed Aylesham settlement.

1.8 Consistent

with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Fertile ground here for foregrounding eg CCC zero carbon policy commitments, that will be in conflict with the plan.

Is the DLP consistent with the current Corporate Plan, which has four priorities or Aims:

- To support the district's economy to recover then grow
- To deliver a better social housing service for our tenants
- To deliver better waste collection services for all residents
- To use our enforcement powers to protect the district

Are these aims sufficiently geared to the needs of the population of the District?

The Corporate Plan seems much less comprehensive in its scope than the NPPF Section 20, which expects Plans to make provision for

(a) development land for housing

(b) infrastructure for among other things transport, telecoms, foul and drinking water, waste

(c) community facilities such as health, education and cultural infrastructure

(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

The Levelling Up Bid recently submitted attempts to deliver on the first Aim, but neither it nor the Corporate Plan has any planning for increasing economic or social well being for the whole population, particularly in Northgate and Thanington areas.

With regard to section 20c) We do not believe the proposed Plan is sufficiently broad or far reaching in its scope, and fails to provide fundamental support measures for all of Canterbury's residents.

Thus **Policy C1** is deeply inadequate in our opinion, and **Policy C4** lacks detail and credibility, being a set of generic ambitions.

The Plan offers its Vision of Canterbury as the key visitor and shopping destination in Kent – suggesting a worrying lack of realism as clearly the implied aim is to eclipse Maidstone.

Equally concerning is the lack any targetted or detailed planning for the support and development of those sections of Canterbury's population not directly involved in operating student housing or retail business.

With regard to section 20(d) The provision of 31,300 dwellings will have a massive carbon impact, and construction of roads will have both a capital carbon impact (construction) and an in-use impact (increased car use), and a bio-diversity impact.

All in all, we believe there are serious conflicts with the duties set out in section 11(a)

*11 a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; **align growth and infrastructure**; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

And the following section is also of great importance in out view, with regard to the wholesale transformation of Canterbury that would result from virtually doubling the housing stock by extensive building at low densities on the historic rural belt surrounding the city that contributes fundamentally to its character, **and which is protected**:

11 b (i).[strategic policies should not be applied where] the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area7;

Section 2 – Where are the documents we viewed in our assessment;

2.1 CCC Evidence base for the DLP

Our comments are based on the CCC **Evidence Base** placed by CCC on a Google Drive webpage

This can be accessed through the CCC website. This link below takes you to a Google page – click on the top line that should say

[New Local Plan 2045 Canterbury City Council.](#)

Clicking through the links arrives at “**Local Plan Evidence and Strategies**”, and then on to the main pages with 10 Topic Papers on key elements, plus links to folders with more detailed documents.

Appendix B gives a list of all the sites that have been listed for development, with detailed commentary, linked to the SLAA **summary of the sites on a map.**

2.2 LDS – Local Development Scheme – timetable.

The Plan process is required to include issue of a detailed outline timetable of the consultation process from inception to adoption of the final approved Plan

It is important to note that this shows five legally binding stages with dates

1	Issues and Options	Oct 2019 – Aug 2021
2	Draft Local Plan preparation and consultation (Regulation 18)	Sep2021 - Jan2023
3	Pre-Submission preparation and publication (Regulation 19)	Feb 2023 - Sep 2023

- | | | |
|---|---|---------------------|
| 4 | Submission (Regulation 22) and Independent Examination Hearing | Oct 2023 - Aug 2024 |
| 5 | Inspector's Report Issued, followed by Adoption of the Local Plan | Sep 2024 |

We are therefore at Stage 2.

It is important to note that in effect, this stage is only stage at which there is community input to detailed proposals, and this informs our comments as below, particularly as regards Viability.

SECTION 3 – SPECIFIC POLICIES

3.1 Housing Numbers

Policy SS3

These are derived from the 2014 census predictions of household growth. We will argue the number adopted in the current Draft would adversely affect the character of Canterbury.

Development Option Paper 2.7 etc

3.1.1 NPPF Standard Method applied to Canterbury

This is quite a complex piece of statistics

There are 2 documents that both count - The **Housing Needs Assessment (HNA)** and the **Development Options Paper (DOP)** that comments on the HNA. The DOP updates the HNA introducing a larger Affordability Factor [AF] - 1.55375, rather than 1.45, and also notes that the Cap on applying the AF does not apply because the Plan is now more than 5 years old - whereas HNA said it did, because at the time of writing it was less than 5c years old.

Hence, see the HNA for the basic figure annual growth extracted from Table 406 - we agree with their numbers

ONS 2014 Housing Projections **Table 406**

Line 323 – for District E07000106 Canterbury (NB – this is CB District)

2021	2031
66833	76890

- so we get an annual growth over period 2020 - 2030 of 8059 dw, so that is 806 pa.

Multiply 806 x 1.55375 (AF) to get 1252 pa.

For a comparable 20 year period to the 2017 Plan, we then get 20 x 1252 = **25,040**

Then a notable manipulation is made

DOP notes at 2.10, “a decision was made” to extend the Plan period from 2040 to 2045.

Thus 25yrs x 1252pa = 31,300 - QED.

3.1.2 Gove Intervention in the NPPF

In December Michael Gove conceded to Tory MPs a proposed change to the wording of the NPPF Guidance on calculating household numbers from the ONS 2014 census. The number given by that method will be a starting point, and local authorities will be able to respond to local arguments.

“To implement the figures will result in a significant loss of or alteration of character. “

He expanded on this in a press statement which included the comment

Where authorities are well-advanced in producing a new plan, but the constraints which have outlined mean that the amount of land to be released needs to be reassessed,

The anticipated revised NPPF consultation has now begun (22 Dec 2022) and the two key new wordings are

Para 7 The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes and other forms of development, including supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. [. . . .

Para 11b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, such adverse impacts may include situations where meeting need in full would mean building at densities significantly out of character with the existing area ⁸;

to which the footnote applies

8 Taking into account any design guides or codes which form part of the development plan for the area, or which are adopted as supplementary planning guidance.

Wed have therefore two grounds for arguing that the DLP45 will not comply with NPPF 2023.

(i) A fully detailed breakdown is needed of the geographical distribution for the housing numbers for the 2017 Plan plus the 2045 Plan, but the proportion of the 31,100 destined for Canterbury, with its current dwelling stock of 22,900 dwellings, will result in a massive expansion of the town (eg if 50% of new housing is for Canterbury, this = 65% increase.) . This is an excessive density.

(ii) significant portions of the housing are proposed for prominent positions on high ground, and this will alter the character of Canterbury, because there is an implicit design code that protects the AHLV from development.

3.1.3. OHSKA Proposal to pause the Plan

Clearly the Plan must comply with the new NPPF, so CCC would be best advised to pause the process and go through a focussed re-consultation responding to the new framework when it is agreed, with new proposals.

3.1.4 Review of ONS 2014 numbers

A further reason for a pause in the Plan is the recognition that ONS 2014 overestimated future growth, but the figures were allowed to stand to compensate for national house building under-delivery in previous periods. ONS 2018 and 2021 figures tend to confirm the 2014 figures, so there will be a degree of over-provision.

In addition, as part of the pandemic effect, student numbers are not rising currently, and may fall significantly, reducing the number of students contributing to the Canterbury City population, and ONS accept that they do not have a robust model of post graduation migration patterns of students after graduation, and are commissioning studies to refine their understanding. This is a significant uncertainty, given the size of the student proportion of the population.

3.1.5 Housing mix

The HNA by Edge Analytics at E13 discusses housing mix.

For clarity, note that ONS 2014 only talks about household projections, not population. Clearly 31,000 4 bed houses might well accommodate 7 persons, 2 bed houses might only accommodate 3 persons – a factor of 230% difference.

The HNA blends several sources on information in its discussion – including the 2011 census, and CCC/s own housing needs register.

It summarises these by saying that there is a decline in younger age group cohorts, a surge in the baby boomer cohort, and a clear preference in rural districts for smaller 2BR houses.

Our interpretation of the first and last figures is that poor economic opportunities are either driving those cohorts away from Canterbury, or constraining the mortgage payments they can afford, leading then to tolerate more overcrowding.

It is well established that the central group of older people will have a strong tendency to down size as children move away, and lower retirement incomes limit ability to maintain the larger family house.

We therefore place little credence in the analysis by Edge. The mix figures in our opinion are incorrect, because they are strongly influenced by the demands of developers who have offered the sites, whose preference is for the median market house size of 3 bedrooms, where the profit margins and demand levels are higher.

3.1.6 Affordable Housing, Viability, CCC Housing Register

3.1.6 It is welcome that CCC have taken comfort from their Viability Study which predicts that market yields on houses will support the full developer contribution of 30% affordable housing and this figure is in the Plan.

A further positive development is the new policy for front end viability studies on individual when detailed applications are made, for the whole of the project development cycle, to be paid for by the developer and commissioned from independent valuers. This means there is a good likelihood that the 30% figure can be maintained through the Plan period.

However, the Local Housing Need (LHN) document sets out some disturbing figures regarding housing need.

The Draft Plan figure of 1152 dw/pa will generate Affordable Housing at a rate of **345** dw/pa

at 30%, whereas CCC's statistics of **Housing Need** show a current need of 464 dw/pa, two thirds of which are for rental. (308).

Who will provide the missing 219 dwellings for overall housing.

The **rental** portion of the Affordable Housing provided under the Plan targets will be 70% x 345, = 241 dw.

Further detail is need as to what proportion of the rented housing is for **social rent** (ie lower rental of no more than 30% local median disposable income)

This throws up two basic issues:

(i) who or what will fund the deficit of 119 dw/pa overall? The Plan is silent on this point.

(ii) The Plan sticks to the CCC traditional blend of affordable housing – of 70% rented, 30% intermediate market. Who will provide the missing 84 rental dwellings ? The Plan is also silent on this point.


3.2 City Character

We focus on character in the sense used in legislation or policies regarding conservation of heritage assets – the quality of buildings combined with spaces between, based on significance with its innate link with historical evolution of the area or asset in question.

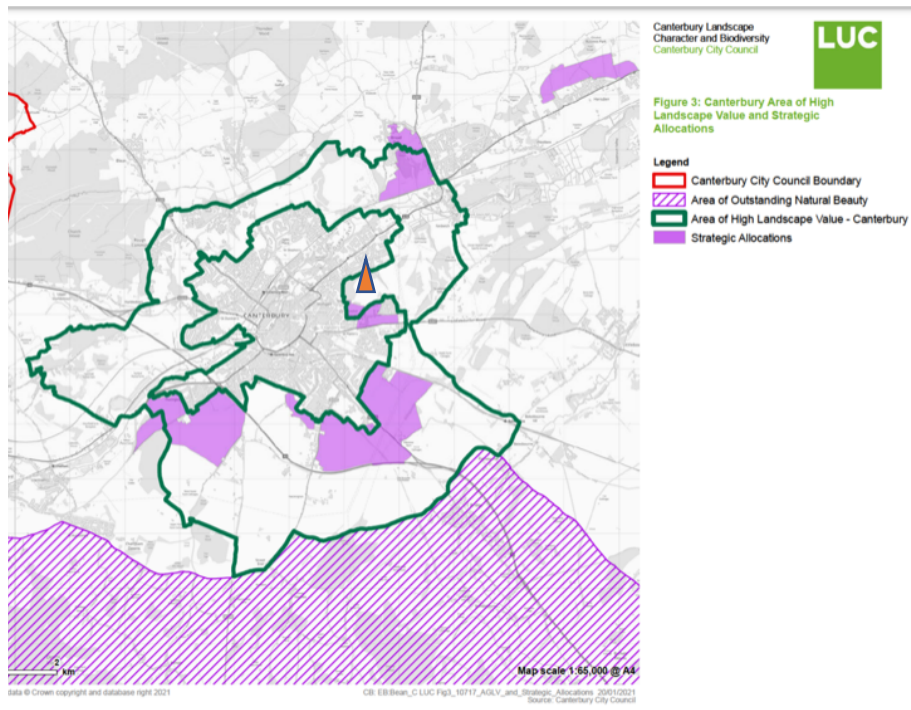
We believe it was significant that the term was used in the Gove press release regarding justifications for departing from the Standard Method number, even though it has not been used in the new Paragraph 11(b). There are strong references in other parts of the NPPF of the duty to Build Beautiful, and we believe this is an important new element that is being more strongly highlighted in the NPPF. It also has major importance to us as residents of historic small city.

3.2.1 - Landscape impact – the Canterbury Area of High Landscape Value)

DS 26

Look at Merton Park as an example of impact. [ in map below] Other sites will be similar..

Canterbury is surrounded by a ring of protected land – of High Landscape Value. AHLV



This is analysed in the CCC Canterbury AHLV document, which explains the unique contribution the AHLV ring round Canterbury makes, by framing the whole city as a shallow bowl, with undisturbed rural landscape forming the horizon or rim, emphasising the compact and moderate size of the city form.

The SLAA – list of development sites – has an entry for this site

SLAA151, SLAA259 and SLAA128 are identified as suitable and available in the SLAA and are allocated as part of a strategic development area in South-West Canterbury. While the SA has identified significant and minor negative impacts across all three sites, it is determined when reviewed alongside the SLAA on the balance of impacts and considering possible mitigation and design, that the majority of these impacts can be addressed. SLAA259 is included in the existing 2017 allocation at Cockerling Farm, however was not included in the planning submission boundary for the approved outline development. The SDA will consolidate growth on the southern side of the city, to build on and integrate with planned growth at the 2017 strategic site at Cockerling Farm. The allocation of these sites will also unlock opportunities to deliver significant infrastructure investment, including a South West Canterbury Link Road, with direct access to the potential new Kent and Canterbury Hospital in SLAA151. This key infrastructure will facilitate the implementation of the Canterbury Circulation Plan which will significantly reduce traffic in existing neighbourhoods, enabling “shared streets” and supporting more active and sustainable travel.

There are three points to note from this entry

- The land will suffer “significant and minor negative impacts”

- The access to the site is needed to provide part of the Circulation Plan road network
- The access can also provide access to the hospital site, for a potential new building.

However – the sites are included because

it is determined when reviewed alongside the SLAA on the balance of impacts and considering possible mitigation and design,

This formulation means - , the benefits outweigh the adverse impacts referred to in NPPF para 11b(ii), and the harms can be possibly ‘mitigated’ – with no hints as to how – and the design form may be able to reduce the harm.

Since the shallow bowl or valley that contains this land parcel is open and frames an open vista all the way down to the city, the Cathedral and the University hill beyond, if the land is built on at 35 dwellings per hectare, this character will be almost wholly lost.

3.2.2 City Character – Heritage.

CCC published a Heritage Strategy some years ago, reviewing the state of the city and its assets, including the World Heritage Site, with respect to residents and visitors enjoyment of the city and the financial value of the tourism it attracts.

There was little action arising from the Strategy, until 2022 when CCC commissioned respected conservation architects Purcell to review the CC Conservation Area Management Plan, for all the conservation areas, to which various residents’ groups responded.

The Report noted that many assets have become somewhat degraded, by wear and tear to some degree, but more strongly by inappropriate use, building interventions including extensions, erection of unsympathetic buildings affecting the context, and by the incidence of inappropriate street scape and materials. A regime of review and increased coherence was suggested . A similar review of the World Heritage Site is now under way.

We believe there is great importance attached to preserving the assets and their settings in a rigorous manner, to avoid their quality being lost through the **cumulative** impact of permitting mediocre new buildings or interventions, and believe CCC must develop active strategies and Design Codes, to **enhance** the character of buildings and spaces.

3.3 Viability

3.3.1 Basic processes of Option Appraisals

Sust

CCC have provided a Viability document in the evidence – as a Summary and a detailed document, prepared by HDH Planning

The Summary shows conscientious analysis of the whole range of housing development indicated in the SLAA, allocating valuations to units, commenting on development costs and potential yields, and evaluating maximum developer contributions that would be acceptable.

These are applied via the Section 106 and CIL systems of levying charges, and assessed as equal to the main costs listed by CCC in their Transport Option Paper.

Considering this computation in isolation for the time being, it is clear what that is **not** done is

- any detailed analysis of the infrastructure costs, listed in the DLP and the Transport Option Paper as £234 Million, or the projection of the effects of inflation which may act differently on house building costs, versus infrastructure costs and other externals on those costs.
- any detailed analysis of major fluctuations in the housing market affecting yield

- (iii) risk assessment and critical path analysis – none of the transport components of the Plan have been designed yet.

Thus, while we see it as a positive move that the Plan does state that at the initial negotiating stages, whole scheme viability studies by independent experts will be required to verify financial robustness of schemes, this does not appear to have been carried out by CCC in their own whole Plan study.

HDH state

12.20 This report is being completed after the United Kingdom has left the European Union. It is not possible to predict the impact of leaving the EU, beyond the fact that the UK and the UK economy is in a period of uncertainty. A further uncertainty is around the ongoing coronavirus pandemic. It is not the purpose of this assessment to predict what the impact may be and how long the effect may last. There is anecdotal evidence of an increased demand for larger units (with space for working from home) and with private outdoor space. Conversely, employees in some sectors that have been particularly affected by the coronavirus have found their ability to secure a loan restricted.

This is an inadequate response to the management of the very large financial risks implicit in the Plan.

Generally, the entire road scheme lacks crucial elements illustrating the connectivity that is stated to exist in the narrative, so we place no faith in the functionality of the scheme, or in the cost estimates provided.

When questioned about this aspect, CCC transport officers acknowledged that more design and feasibility work would be carried out after the consultation closes, among other things to incorporate the various inputs.

We find this wholly unacceptable as the LDS has no provision for a further round of consultation on these refined designs. Is CCC proposing a further consultation round?

3.3.2 Inconsistent and Biased Option Appraisal

In our opinion, the overall approach taken by CCC breaches what is accepted good practice in carrying out Option Appraisals, as instanced for example in HMG consultations..

The essence of robust decision making is to define desired outcomes, and to do so in a manner that generates criteria that can be used a tool to review the range of options that are thought to be likely to deliver the required outputs.

It is essential that financial costs for possible scenarios are built up from various strands of enabling activity, and that degree of mutual independence of these strands must also be assessed, to allow alternative mixes of options to be developed. Risk assessments are required so as to evaluate the likelihood of success or failure. Of each strand. Full allowance must be made for such contingencies as inflation, external factors including changes in policy frameworks, markets, or technologies, and capacity building issues - such as the detailed design for the proposed Circulation Plan.

Similarly, the impacts – both positive and negative, quantitative and qualitative – of possible packages require analysis, particularly with regard to how their component strands interact, and what criteria there are for ranking impacts, which are a crucial element of the NPPF formula.

The CCC methodology ignores totally most of these basic rules, and proposes instead just two **outline** elements, neither of which is yet designed, of – 31,300 dwellings generating contributions of £234Mn to pay for a new road package. No options outside these two envelopes are considered.

It may be argued that the Jacobs Report did investigate options, but there were no costings developed, and other major issues such as carbon impact were never considered.

Our final comment is that the Carbon Option Papers note that the best figure for modal shift to active travel that can be hoped for is 15% of current ring road traffic, but there is no assessment of the congestion level to be expected on the new roads particularly the access points, or of the carbon generation potential of the significant number of new long trips approximately 3 - 6 extra miles - required by drivers to circumnavigate town via new road rather than the inner ring road.

3.4 The Pattern of development

3.4.1 Where to build

At the Initial Plan stage, CCC set out five Options, which were modelled by transport consultant Jacobs. Options Three and Five included remodelling of the inner ring road.

Many residents commented that the preamble to the review ruled out the inclusion of a sixth option, that of a free-standing settlement, on the grounds that such a scheme would have higher infrastructure costs if placed in a greenfield setting, leaving less net benefit, and that this would limit the scope of new infrastructure works that CCC could carry out in Canterbury City.

In the current iteration of the Plan a free-standing settlement has appeared, but there is no discussion of the adverse impact that this logically should have on the funding of Canterbury infrastructure, if the earlier comments were accurate.

In view of the fundamental capacity problems we list in this Response, we believe the only rational and sustainable way to resolve the many issues is to pay proper attention to NPPF 11(a) and consider alignment with infrastructure as a fundamental driver. A site should be negotiated between Canterbury and its neighbouring authorities to provide the majority of the new housing in a substantial new settlement away from Canterbury, linked directly to trunk roads, and of sufficient size to achieve genuine autonomy for the majority of its services.

3.4.2 A new road network – the impact of generating £234Mn.

In the earlier consultation, CCC had included 5-8000 additional dwellings to arrive at a total figure for 2027 Plan plus 2040 Plan of 31,000 dwellings, specifically to pay for the city infrastructure projects, with only the most global estimates of costs to support this, and without any detailed road design.

The major impact that 5000 extra dwellings would have on a city of 23,000 dwellings was investigated.

Similarly, in the current consultation, as noted above, CCC extended the Plan period by 5 years to 2045, explicitly to arrive once again at 31,300 dwellings, clearly to pay for the infrastructure scheme outline for Options 3 and 5, again without an impact study.

3.4.3 Canterbury Circulation Plan (CPP)

CCC and KCC present the CPP - part of **Option 5** - as the only way of reorganising internal routes within Canterbury, modelled on an approach used in Ghent. The benefits are taken as self-evident, but there is no accounting of the negative impacts on the local economy, or residents basic needs in pursuit of their established way of life.

Ghent is also approximately three times the size of Canterbury. Its terrain is flat, and with a much more rational modern road network, and is therefore not a credible model for Canterbury.

It is worth noting that the 2015 Transport Strategy claimed that large modal shifts of up to 50% were possible, citing the example of Shanghai, which also has flat terrain.

The CCP subdivides the city into radial segments, each with an axial road connecting inner ring road to and outer road, referred to as an outer ring road. Traffic may not travel radially from one segment to another except via the outer ring road.

The layout for the 2023 – 2045 Plan required a new western axial road to serve the south Wincheap area, which is provided as part of the Merton Park development. Thus, in one more respect, the housing number has been manipulated to pay for another new road, to provide an essential link to the outer ring road required for the viability of the CPP scheme.

Further basic feasibility issues for the proposed new road are referred to in the next section.

However, the two most important aspects of the CPP are

- (i) The absence of documentation of KCC Highways inputs to the design formation. CCC have indicated in consultation meetings that it is a KCC requirement that outer ring road capacity be provided **before** any significant inner ring road changes are made.
- (ii) The fact that under normal S106 arrangements, the outer ring road cannot be built until a substantial proportion of the 31,100 houses are built, and with an uncertain housing market, this means a long or very long delay before the new roads might be operational. No interim road re-engineering or congestion charging schemes are envisaged in the meantime.

Apart from the main construction financial viability issues, the CPP scheme described in the Plan offers no detail of the process by which new live/work travel arrangements might evolve for residents or visitors, or what financial, social or opportunity costs they may have. ?

Meanwhile, if the Plan is approved, for up to 20 years or more in advance of the new road construction, major new construction projects will be built out with ever-increasing congestion impacts.

We argue that at the very least, CCC must investigate fully how £234Mn might be expended not on a car-driven scheme with new by-passes with increased car use, but on a comprehensive high quality public transport system, similar to say Freiburg in Germany, that provides an attractive non-car-led alternative to the current gridlock.

3.5 Zero Carbon Appraisals– Housing and Transport.

3.5.1 Transport

In the Transport Option Paper - which is written by KCC - there is a review of the effectiveness of modal shift measures agreed in the Canterbury District Transport Strategy (CDTS).

Contrary to our arguments above about timescales, and confirmatory remarks made at consultation meetings with CCC officers, the paper states

The strategy to achieve these objectives involves working quickly to be able to put in place a Circulation Plan that prioritises healthy and safe walking and cycling,

It goes on to say

Significant transport infrastructure projects were proposed, associated with major Developments These include a repositioned and improved A2 junction at south Canterbury; Sturry relief road; Herne relief road; improvements to A299 junction at Heart in Hand Road; a realignment of A28 eastbound at Wincheap; and expansion of all 3 Park and Ride car parks around the city. Improvements to the bus network and cycling and walking networks were also proposed. Housing delivery associated with the existing local plan has not advanced as expected and, as a result, none of the committed transport infrastructure projects have yet been completed.

There is limited evidence so far of modal shift.

It goes on to say that stronger measures will be needed to persuade residents and visitors to move to **increased us of active travel** - cycling and walking, hence the Option 5 plan for imposing major interventions on Canterbury motorists.

We strongly question the validity of using the last five years as the pattern for the next five years, and assuming all the schemes proposed were of faulty design. Yes they do demonstrate that consistent incentives and or encouragements are needed, and that coercion of the residents of a city is not easily achieved. But to go to the lengths of a major ring road building programme is yet another very expensive experiment.

More detailed action plans with stakeholders should be the preferred initial option.

The Carbon Reduction Option Paper itself points out that HGV traffic is hard to reduce, or decarbonise. It is extremely interesting to see the attempt in the CCC paper to consider how to influence the public actors on the Canterbury road system: This is a different approach to the CCC Climate Emergency Resolution of 2019, that set targets for net zero for 2030, but only for CCC 's own estate.

However, even the Carbon Reduction paper accepts that the majority of trips crossing Canterbury are local, and that the evidence that they can be induced to switch to active travel is limited, to say 10 - 15%. **The much quoted exemplar city of `Ghent only achieved 12%**

3.5.2 Housing Fabric and Operation.

Excellent analysis is provided to show that, as noted in remarks about the Viability Study, even after imposing mandatory net zero carbon standards on house builders, the profit margins are sufficient to support robust developer contributions.

However, it stands out that road construction itself remains carbon intensive, and will remain so for a considerable period of time.

House construction is similarly intensive – with embodied carbon in the fabric amounting to approximately 20 years of emissions for heating.

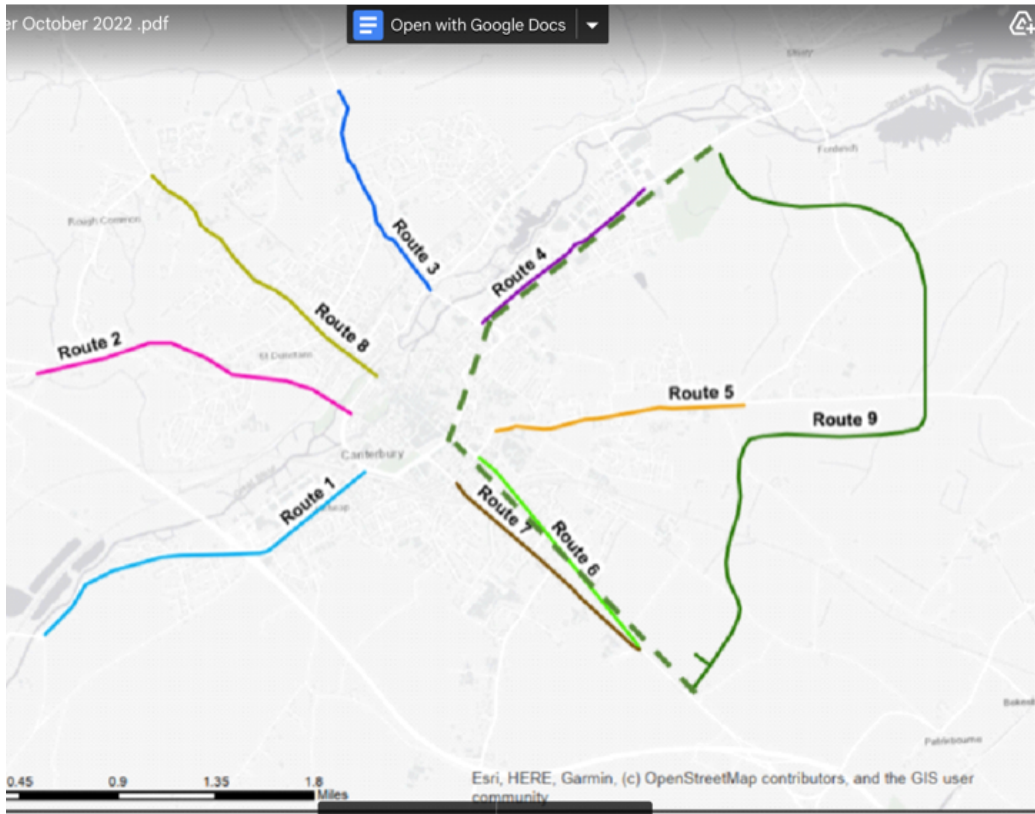
A calculation has been done for the whole estate to 2045,

- net carbon emissions – embodied energy – 1.4Million T CO2
- net carbon emissions – operation 800,000 T CO2

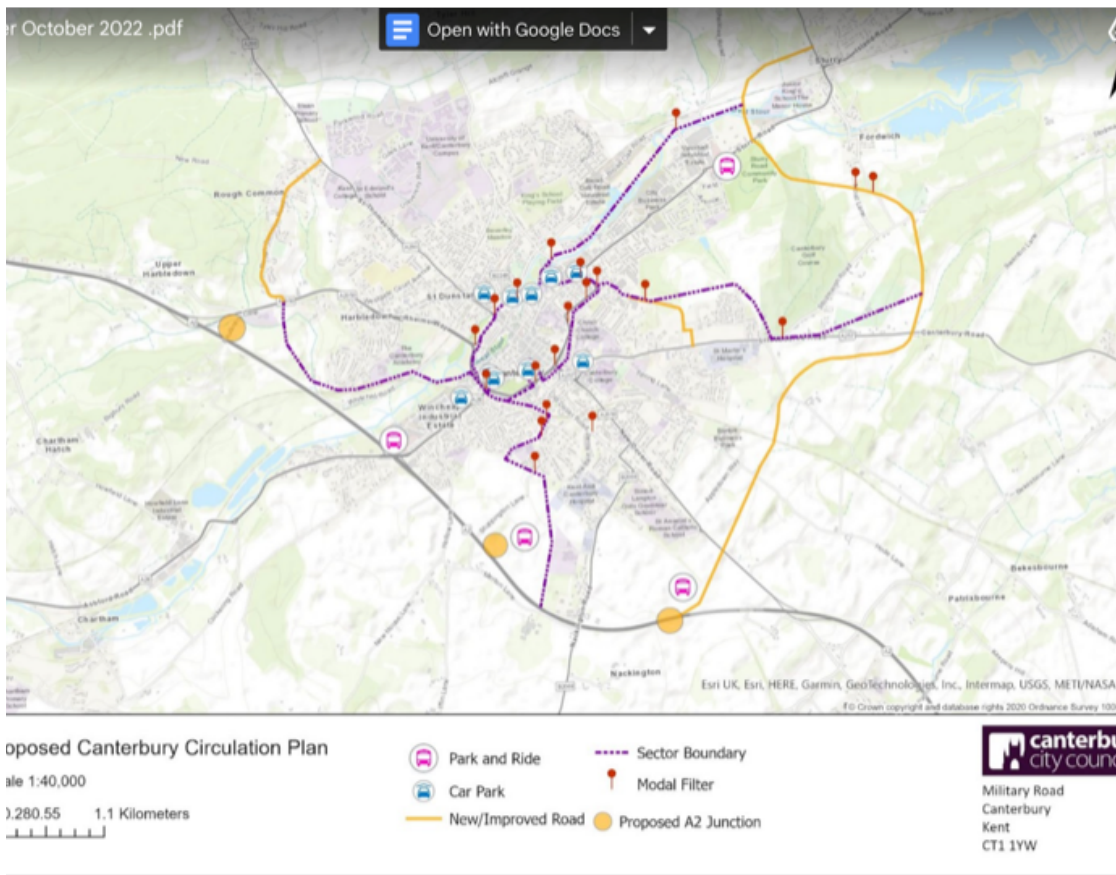
Construction density is set at generally 35 dw/ H, which is the typical historic density, and makes no concessions to reducing both cash and carbon costs.

This must be an incentive to reduce house construction to a reasonable minimum, and to consider less carbon intensive building types – a higher proportion of flatted buildings.

Canterbury Circulation Plan – outline map



Canterbury Circulation Plan - detail



3.6 Viability / Road Design Problems

We set out some of the more egregious omissions in the Plan road designs.

The main Local Plan document is provided with numerous maps of the various development sites, generally of mediocre quality.

2017 Plan housing allocations are in **peach**

3.6.1 Canterbury Circulation Plan

- (i) Where is the modelling of vehicles flows in each sector
- (ii) There is no detail of any part of the system, other than some examples of modal filters – which are basically NPR cameras, which generate fines for cars crossing between adjoining segments without authorisation.
- (iii) The occupants of the city centre, within the city walls will have particular difficulties – while NPR cameras might be set to allow them on to the inner ring

- road how will the system control their exit from it? Will they basically have uncontrolled access to all radial roads?
- (iv) How will access to car parks, which are to move to outside the inner ring road, be accessed?
 - (v) How will abuse be controlled
 - (vi) How will residents who work across the city from their vehicles be facilitated?
 - (vii) There are no details of connections for some segments to the bypass – eg Merton Park.

3.6.2 Merton Park A2 access. Policy C6

The Plan has no detail of the connection from the A2 to South Canterbury Road.

Is this also supposed to be the connector for Wincheap area residents, rather than on to the A28

3.6.3 Hollow Lane Policy C7

There is no layout for the link road connection between the A2 and Hollow Lane where it joins Hollowmede. A historic sunken lane cannot accommodate a modern road. The numerous 'possible link road' indications are impossible to evaluate.

3.6.4 Rough Common Road – Western By Pass - Blight

In the early draft this was a new road, obliterating ancient woodland between Rough Common and the area above Glen Iris Avenue.

This plan has been dropped, in favour of widening and improving the whole length of the road as it passes through the village. No date is allocated for the work, but it will be disruptive to fronts of houses or gardens, and blight the entire length of the road.

This is an untenable and unfair strategy, penalising the residents of Rough Common through the lack of competent planning by CCC.

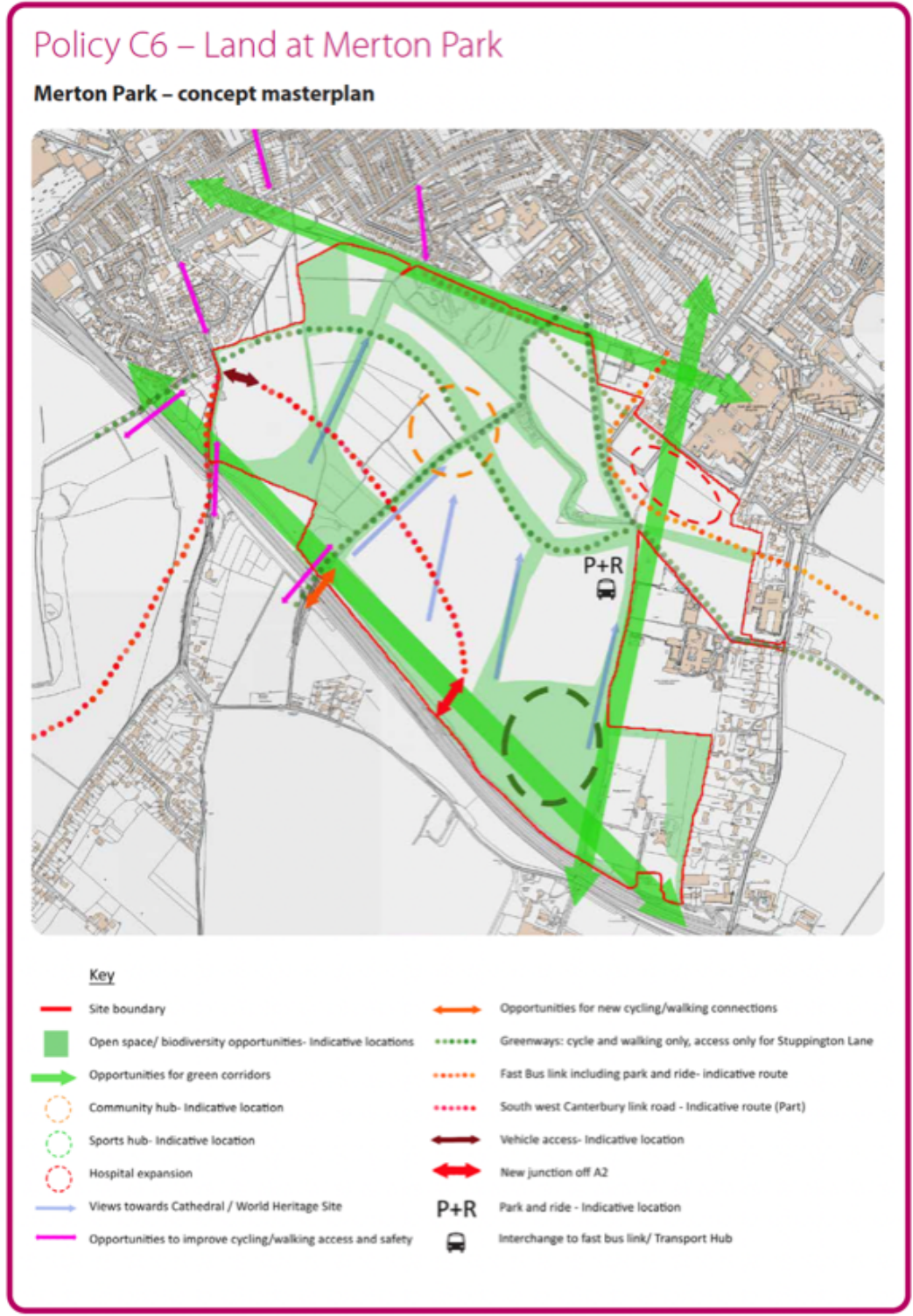
3.6.5 Rough Common Connection to A2

There is no link shown in plans to connect the A2050 road at Vernon Grange, where Rough Common Road terminates, to the A2 bypass southbound. There is also virtually no suitable land in Harbledown.

3.6.6 Eastern Movement Corridor.

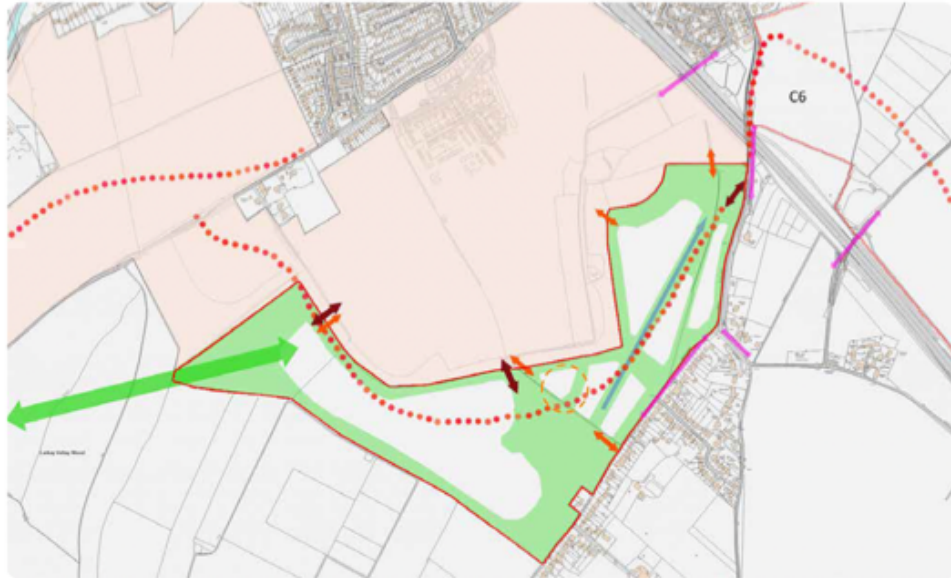
Earlier, it drove through Old Park Wood – an SSSI . It has now been re-routed further north, but still approaches Sturry on a line that brings it inside the buffer zone to the SSSI, approaching very closely the edge of the site.

The plan is still not scientifically acceptable, or consistent with protection policies accepted by KCC/CCC.



Policy C7 – Land to the north of Hollow Lane

Land to the north of Hollow Lane – concept masterplan



Key

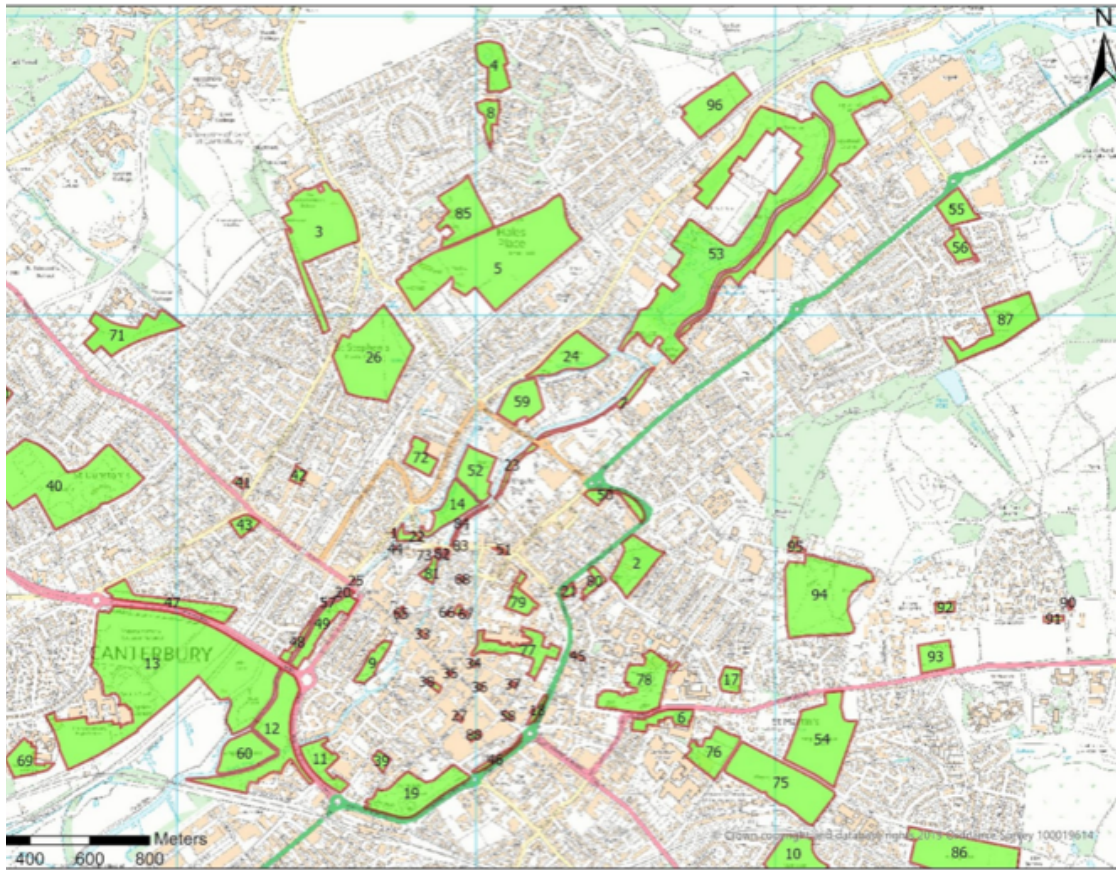
- | | |
|---|--|
|  Site boundary |  Opportunities to improve cycling/walking access and safety |
|  Open space/ landscape buffer - Indicative locations |  Opportunities for new cycling/walking connections |
|  Opportunities for green corridors |  Vehicle access - Indicative location |
|  Non residential uses - Indicative location |  South west Canterbury link road - Indicative route (Part) |
|  Key views |  Strategic sites Local plan 2017/ other sites |

3.7 Open Space Strategy

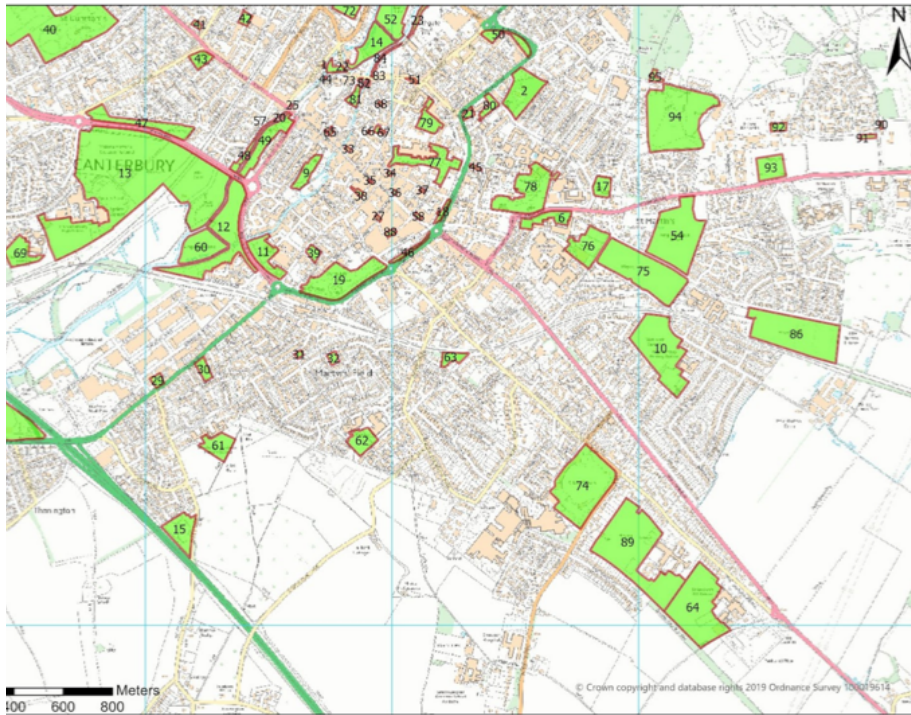
3.7 – Open Space Strategy

3.7.1 Plans – Responses to CCC call for sites - Open Space

bury

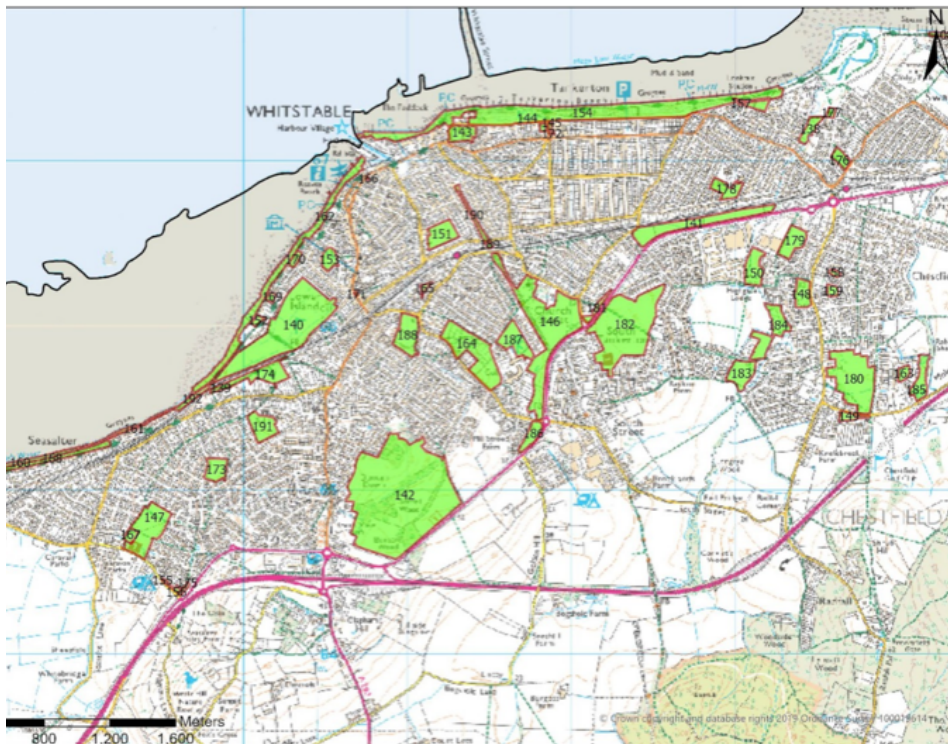


.4: Protected Open Space in the north of Canterbury



5: Protected Open Space in the south of Canterbury

ble



1: Protected Open Space in Whitstable

3.7.2 Open Space Policies

CCC called in May June for suggested sites for renewable energy, but also to be preserved as Open Spaces, Green Gaps, Local Green Spaces.

This an idea copied from Ashford BC – as development pressure mounts, it becomes more necessary to identify spaces NOT to be built on

There are many positive policies in the Open Space Strategy, and the Trees and Woodlands Strategies.

However: these are the areas put forward, not what is required to satisfy objective criteria. Is this fragmentary scattering of spaces a strategy?

Are all areas of housing adequately served?

The adopted OSS does not contain details of urban areas that are known to have shortfalls – for example South Canterbury. The Report is content with saying that future housing will be provided with Open Space to the requisite standard, and the overall amount of open space per head will increase. CCC is on record as saying that they have no plans to redress historic shortfalls.

This is not an adequate plan.

3.8 Cycling Policies

These appear in various documents – Infrastructure Topic Paper (ITP), the Transport Topic Paper (TTP) etc.

In the ITP Schedule A notes that of the £234M planned expenditure, there is a sum of £20M for cycle improvements, which is clearly a best guess covering the whole district. Given the cost of road modifications, especially when being carried out on arterial roads, the most dangerous for cyclists, this sum will not in our opinion be sufficient to cover the whole of Canterbury, let alone the District.

It represents an acknowledgment that cycle routes are of major importance, but in no sense can be taken as an adequate or considered scheme that responds to all the current areas for cyclists, and the increased levels of traffic that can be expected.

It is very important to bear in mind that apart from the problematic inner ring road in Canterbury Centre, there are many high traffic arterial routes in Whitstable and Herne Bay suburbs, not to mention the main through routes, eg the A2, the A28, the Thanet Way.

Of equal importance is the interface between cycle and motor or pedestrian modes. The Plan makes mention of mobility hubs, and these also appear in for example the Committee Report on the detailed plans for Mountfield Park, a housing suburb of 4000 houses. Experience in Oxford, for example, much more relevant than Ghent, shows that allowing residents to take an incremental approach to their longer trips by swopping from cycle to walking or train/bus transport modes, or from electric car to cycling etc etc, greatly increased the take-up. Canterbury must offer a full network of fully functional hubs, and these once will cost much more than the part share of the £20M offered for the whole district.

The same criticism must therefore be made as for the cycle network itself – the allowances made in the Plan are

- (a) no plans at all and
- (b) an inadequate token funding gesture.

3.8.1 Detailed Design

The TTP does take an important step forward in offering one detailed layout for a safe junction, taken from Dept for Transport Cycle Infrastructure Design Manual (2020) fig 10.39, which is to be commended. It is a great improvement on the layouts used in recent planning drawings for Mountfield Park, which still persist in the mistaken view that a dual carriageway roundabout is safe for cyclists, merely by allowing them a separate outside lane. There are no priorities offered for cyclists over vehicles, and they do not work.

However, the example offered, if studied in the DfT Manual, still has potential gaps in the priority flow for cyclists, needs more clarity about implementation, and is only a typical solution. Once again, this single illustration can only be taken as a token effort, but has the potential to be a valid approach to solving the personal risk factors that heavily inhibit cycling.

3.9 Environmental Issues

3.9.1 Loss of Agricultural Land

Using simple overall measures, taken from the Plan documents we see that The Appendix B (SLAA submissions) shows 1106 Ha of land provisionally allocated as suitable for development (all uses). That is to say 11 square kilometres

To this would have to be added the land required for the Eastern Movement Corridor, plus any other major road junctions.

This is new land – ie not including the land required to develop the carried forward dwellings from the 2017 Plan.

These are listed in the Development Topic Paper Table 6.4 as 11,970. Assuming a density of 35dw/H this adds 342 Ha to the total, without extraneous infrastructure, giving a total land take of 1448Ha, ie 14.8 sq kilometres.

All or most of this land will be Best and Most Versatile Land, lost for ever to agriculture, and we believe at a time of ecological and economic stress, and increasing issues with food security resulting in rising prices, there should be an Impact Assessment to quantify the damage done by this very significant loss of land.

As we have argued in the section on Housing Numbers, and on Carbon Impact, the impact of new housing, at whatever is finally agreed on, is reduced if proportionately more are built at greater density, generally involving a greater proportion of three or four story dwellings of suitable design.

3.9.2 Bio Diversity, Green Corridors

At a time of large scale reductions in species types and numbers, the policies offered to mitigate this are poor.

As an example, Policy SS1/4 requires a net increase in bio diversity of 20% when sites are developed. We strongly urge that this figure be raised to at least 100%, and be constrained to be provided on the development site.

This is because, as we have seen in for example Mountfield Park, that 20% net gain means that the very low levels of diversity as seen on modern farming sites with field boundaries that are few and of minimal habit value and monoculture in the very large fields, will produce insignificant new habitat.

SS1/6 requires coherent green infrastructure, and in particular we believe this means **green corridors** connecting sites, and within sites, that correspond to national guidance on minimum widths etc. This normally means 50m minimum.

Similarly, developers are now seen to offer narrow strips of grass land bordering estate blocks as open space - these have almost no ecological or landscape value.

Policy SS15 requires 2-% tree cover on sites of more than 300 dwellings. This should be the case in **all** developments.

As an example of poor practice, where detailed plans contradict the statements made in broad policies, see the plans for the EMC as it skirts SSSI Old Park Wood, where the road breach three buffer zones that surround the wood. Much better detail is required that reflects the complexity of ecological reality.

The Green Gaps policy in the Open Spaces Strategy offers vague and inadequate proposals in support of Green Gaps. These are shown in diagrammatic form, but in some cases, eg for Chartham/Canterbury, the detailed plan shows an inadequate strip of land which will not provide significant habitat, or visual/social separation between housing.