



CCC Consultations &lt;consultations@canterbury.gov.uk&gt;

## Responsee to Canterbury District Local Plan to 2045

1 message

Elizabeth Cowie [REDACTED]

16 January 2023 at 16:33

To: "consultations@canterbury.gov.uk" &lt;consultations@canterbury.gov.uk&gt;

Please find below and attached my response to the Canterbury City Council Plan

**Professor Elizabeth Cowie**

[REDACTED]



[2023 response to Canterbury council plan.pdf](#)

### Canterbury District Local Plan to 2045 - Response by Professor Elizabeth Cowie

[REDACTED]

I have very major objections to aspects of the Plan, as outlined below:

CCC DRAFT LOCAL PLAN 2045

Para 7 declares: '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.'

Para 8 Claims that: 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.

*My Comment:* I find no compelling evidence in the plan for the achievement of objectives a), b) and c). FIRSTLY re a. the plan only refers to housing for purchase, including 'affordable' housing. It does not include social housing for rent. Given that 30% of residents are likely to be renting, and in the context of the huge waiting list for social housing in the Canterbury district, it is clear that the Plan **does not** seek to properly meet the needs of the present, or the future residents of Canterbury, or of businesses seeking skilled and educated workers who are unable to afford either the high rents or high price of Canterbury City housing. AND there is no economic and social planning for increasing the economic or social well being for the disadvantaged neighbourhoods of Northgate and Thanington in the Canterbury area, or for the whole population of Canterbury District, with housing development focussed on South and East Canterbury.

**I disagree** that the advantages outweigh the disadvantages of the proposed target of 31,000 new homes - no account of the 'advantages' is given in the Plan, nor how it meets existing local needs and future needs. There is no clear legal certainty 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 such certainty, and given that such funds are not available until a major part of the housing has been built, the Plan involves unacceptable risk of severe Council deficit.

SECONDLY re (b) There is a clear risk to the local character of Canterbury and its immediate environs. The 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. This target will heavily and devastatingly affect the local character of the region. Canterbury City is surrounded by a ring of protected land - of High Landscape Value AHLV - framing the City, itself home to three major World Heritage Sites. The Plan itself admits there will be 'significant impacts' on the HHLV area as a result, claiming that 1. the advantages of the SLAA outweigh these disadvantages; and 2. that there might be 'possible mitigation' but with no indication of how! Without clear and viable plans for 'mitigation' residents of CCC cannot make an assessment of the plan in relation to the housing proposed.

Moreover, Housing Minister Michael Gove has conceded to Tory MPs debating the Levelling Up Bill a change to the wording of the NPPF Guidance on calculating future household numbers from the ONS 1024 census. The number given by that method will be a starting point, and local authorities will be able to respond to local arguments showing that "To implement the figures will result in a significant loss of or alteration of character."

Further, Gove states 'Where authorities are well-advanced in producing a new plan, but the constraints which I have outlined mean that the amount of land to be released needs to be reassessed, I will give those places a two year period to revise their plan against the changes we propose and to get it adopted. And while they are doing this, we will also make sure that these places are less at risk from speculative development, by reducing the amount of land which they need to show is available on a rolling basis (from the current five years to four).' CCC should review its proposals for development in the context of the Government's changed policy. This Governmental change offers CCC the opportunity to re-think its Plan and its focus on building within Canterbury City environs.

Further, the plan refers only to new primary schools to be provided in new estates by developers. It refers to new secondary school places in Whitstable and Herne Bay 'which will allow more secondary school pupils - both at the coast and within Canterbury city - to attend a school in their local area'. No reference is made to KCC plans for secondary schools in the district, and how such new secondary schools would be funded, nor whether these would be selective or non-selective. Given the poor overall rating of Kent's secondary school education this should be a key matter of concern for CCC in enabling developing high levels of educational attainment for children in the region to attract business development.

### THIRDLY

Further, with the proposed very large new housing estates where residents will wish to access Canterbury City, increasing problems of traffic that have already arisen with

past development such that congestion has now increased to a critical level on Canterbury's partial dual carriage way ring road and adjoining single carriageway roads. Moreover additional transport issues will arise with school students from the new housing south and east of Canterbury city centre accessing existing schools within the City centre or to the north and west Canterbury city centre. The KCC and CCC proposal is for 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).

BUT:

1. KCC's requirement that the outer ring capacity be provided before any significant inner ring road changes are made is not addressed by the CCC plan. But the problem of traffic is local, of journeys within and across the City.
2. The Inner ring road has met with derision and disbelief by appalled City residents and visitors, as noted by the local newspaper. CCC has given no evidence from transport planners that its plan would provide any relief to the serious and crippling effect of traffic queues in and around Canterbury, notably Wincheap, with its planned increased housing in Thannington, but also New Dover Road, and Sturry Road, or on the severe air pollution affecting the city.
3. Plans for Park and Ride depend on the new outer ring road, with no certainty that these will be developed as new housing is completed.
4. CCC's plans for low-carbon active travel (I am unclear what passive travel would involve) reduce capacity on the inner ring road, yet it will remain central for movement from outside Canterbury City to sites along the inner ring road.
5. Road plans fail to include consideration of traffic across Canterbury to business and industrial parks, current and - hopefully - new centres of work and retail business.