

## A comment on the CCC Local Plan 2045

Overall, I find this plan very disappointing, and wish to register my disapproval – despite there being some good things within (e.g. much of what is proposed concerning open spaces, trees, and pollinators).

My overriding impression is that the plan is about building and/or re-developing roads. This then gives rise to the two other main ‘preoccupations’ of the Plan – the need to raise money to fund the road programme – and thus the plan to build over 30,000 houses across the district as the primary means to raise the very large capital sums required. That this is unbalanced seems not to be just my opinion: <https://www.planningresource.co.uk/article/1718595/kent-council-backs-local-plan-housing-target-almost-double-its-need-figure-fund-bypass>.

### *Traffic*

The plans for Canterbury City amount to doubling the resident population. This in turn would surely have a major impact on traffic volumes – not least in these days of ‘online shopping’ and increasing proliferation of delivery van journeys within and across the city. The ‘solution’ offered by CCC lies in road building (e.g. the proposed Bridge interchange and Sturry link road) and the five-radial zones scheme to limit across-town car journeys by residents. In my view this will generate more car-miles – not only as a result of the zonal scheme itself (‘induced traffic’), but also due to the wider overall phenomenon of generated traffic. As has been observed:

... engineers are shifting their thinking toward traffic. Formerly, the model for traffic was a “liquid,” where adding capacity relieved congestion. Now engineers are starting to see traffic as a “gas,” where traffic volume expands to fill the capacity. (Peter Jacobsen, *Los Angeles Times* 1997: <https://www.latimes.com/archives/la-xpm-1997-05-14-me-58478-story.html>)

### *Water supply and climate change – significance for sustainability, biodiversity and landscape*

East Kent is a peninsula with very low average rainfall compared with many other parts of the UK (the exception being Essex – the driest UK county). The historical rainfall for Canterbury is said to be as low as 300 mm (12 inches) per annum. Across the UK as a whole, the average annual rainfall over the period 1995–2021 is three to four times higher (<https://www.statista.com/statistics/610664/annual-rainfall-uk/>).

The 2020 KCC report *Climate Change Risk and Impact Assessment for Kent and Medway* predicts that, by 2040 (i.e., before the end of the period covered by the plan), we will experience:

Hotter summers with an increase in average summer temperature of 2–3°C

Summer rainfall reduced by 20–30%, and winter rainfall increased by 10–20%.

With hotter and drier summers we will surely see peak demand for water greatly increase – especially if we have, by 2045, an additional 35–70,000 people living in the district as a result of the proposed building programme. This poses many issues regarding the local infrastructure needed to sustain

human life (through our social institutions) – and for biodiversity. With respect to the latter and freshwater, two local concerns stand out: water flows in the Great Stour – the largest chalk stream in SE England, and the Stodmarsh SSSI – parts of which have five different designations indicating the exceptional conservation importance of this Great Stour-fed wetland, including that of being a Ramsar international site, and having European status for the conservation of wild birds ([https://en.wikipedia.org/wiki/Stodmarsh\\_SSSI](https://en.wikipedia.org/wiki/Stodmarsh_SSSI)).

With respect to the Great Stour, it is now recognised that chalk rivers globally form a very rare type of riverine ecosystem, with as many as 85% of all known examples being found in the southern half of England (<https://www.wildlifetrusts.org/habitats/freshwater/chalk-rivers>). Extraction of chalk aquifers for fossil water has already done massive damage to the UK's chalk rivers and streams – it is only the size of the Great Stour that has ensured that it does not dry up in the summer (yet). The Great Stour and Stodmarsh represent unique natural heritage for the area which, together with our local parts of the Kent Downs AONB (<https://landscapesforlife.org.uk/about-aonbs/aonbs/kent-downs>), are assets that we should treasure, promote, protect and celebrate – alongside our UNESCO World Heritage cultural status (more of which below). The road and excessive house-building aspirations of the Local Plan 2045 are a threat to all of this – and to farmland, which, with climate change and deteriorating international relations, will become ever more important for local and UK sustainability.

#### *The elephant in the room – the existing, rate-paying local residents of Canterbury*

For me it is not just the focus on road-building funded by house-building that is the only reason for my great disappointment with this plan. Who is the plan for? Little mention is made of the needs of the existing local residents. How many people in Canterbury District are in seriously substandard accommodation or are on a waiting list? Would this sum to 30,000+ by 2045? A recent local newspaper article states “Nearly 20,000 people are still waiting to be rehomed by local authorities across Kent.” The population of Kent is *ca* 1.86 million; of Canterbury district, *ca* 165,000 (somewhat less than 10% of the total). Social deprivation in Canterbury district is about average. All this suggest that the waiting list for accommodation in Canterbury is in the order of 2000. However, as developers build houses, not councils, there is absolutely no guarantee that if 30,000 new homes were built in Canterbury *overnight* that any of them would be affordable for those on the waiting list – let alone would it solve the *total local* need for people to be rehomed by Canterbury City Council.

With respect to the quality of life for existing local residents in Canterbury who are fortunate enough to own or can afford to rent accommodation – and pay their Council Tax – the draft Plan seems to give scant regard. All the focus, if the plan becomes reality, is that the new estates, however wonderful or not with respect to housing standards (carbon neutral?), community facilities, open spaces etc etc, will largely serve the needs of people who currently do not live here. And what will be source of their income? Is a further great increase in local college and university jobs expected to sustain them? Commuting to London? New service industry jobs? Tourism? How will our tourism ‘industry’ fare if Canterbury loses its UNESCO status (as Liverpool has recently) because all the long ‘pilgrim’ views of the Cathedral and surrounding hills have been lost to housing? If the river has dried up and Stodmarsh is polluted because Southernwater, which cannot or will not cope now, simply isn’t up to providing the sewerage infrastructure needed, and South East Water, faced with an imperative to keep the Great Stour flowing plus summer droughts, cannot provide a reliable water supply? Not to mention the inevitable increase in traffic congestion (if not pollution), and the five zone traffic scheme to control and limit the movements of existing residents.

## *Healthcare*

It seems undeniable that the NHS and social care are in crisis at this point. Consider GP provision. The national average number of people per GP has recently risen to about 2300 (October 2022: Office for National Statistics website [Trends in patient-to-staff numbers at GP practices in England: 2022](#)). In Thanet the number is currently said to be 4000, while for Swale it is *ca* 3300. Although Canterbury is better, overall, Kent & Medway have been claimed to have the highest patient to GP ratio in the UK (<https://www.kentonline.co.uk/medway/news/reasons-why-kent-has-uks-worst-gp-numbers-272523/>). It is local ‘folklore’ that, because of a degree of social deprivation coupled with the ‘peninsula effect’, recruitment and retention of medical staff in East Kent is particularly difficult. The recent creation of a joint University of Kent/Canterbury Christ Church University medical school may in the longer term lead to some improvement – but the Local Plan 2045, if it is to have such an ambitious house-building target, must address this problem – or be scaled appropriately.

## *A personal note*

I have to confess that, like many residents, I find one of the most negative things about Canterbury is traffic congestion. So I would of course welcome a considered and effective way to reduce this. Its roots lie in the fact that the town plan is still essentially that of a mediaeval walled city – set in a bowl of flanking low hills (the downs), astride an important river. But this is of course the main USP for Canterbury as a quality heritage destination for tourists and home seekers alike. Another downside is its setting – a setting that for so long welcomed pilgrims to the original seat of Christianity in England – which used to be beautiful, but is now subject to the ever increasing uglification of its main approaches – notably Sturry Road and Wincheap but also now, step by step, the New Dover Road. I can only see the draft plan making this worse – especially by further damage to the long views of the Cathedral from the east, and from orchards and other areas just north of the A2 – areas that now look set to be covered in houses. Then there is the Chequer’s Wood and Old Park area ([https://en.wikipedia.org/wiki/Chequer%27s\\_Wood\\_and\\_Old\\_Park](https://en.wikipedia.org/wiki/Chequer%27s_Wood_and_Old_Park)), set to suffer from the new link road as well as housing. If the ‘university slopes’ are built on, yet more damage to the historic setting – all added risks to our UNESCO world heritage status.

## *Conclusion*

This plan needs to be reformulated with the real *needs* of the existing population placed at its core – at its *heart* I am tempted to say. Protection of our *landscapes* (‘cultural’ as well as ‘natural’) needs to be far more strongly emphasized. Plans for *expansion* must be tempered by a far more realistic appraisal of what is sustainable – in terms of natural resources (e.g. water supply), the needs for significant improvements to infrastructure (e.g. sewerage), and services (notably social care, healthcare, and primary and secondary education). The draft plan is overambitious quantitatively, and under-ambitious qualitatively.

One way to help with this would be to mobilise and make use of the huge range of knowledge and expertise that exists among our local residents. It is over four decades since David Widdicombe, QC ([https://en.wikipedia.org/wiki/David\\_Widdicombe\\_\(barrister\)](https://en.wikipedia.org/wiki/David_Widdicombe_(barrister))) wrote:

The plain fact is that people everywhere in this country today want more say in the decisions that affect them, whether at their place of work or where they live. Voting once every few years may have been enough a hundred years ago, but it is not enough for a community which has enjoyed the benefits of universal education for several generations. Our institutions must develop to accommodate this demand for participation. In particular ... we must devise ways to involve people in decision-making in the field of transport policy (quoted from Foreword by D. Widdicombe to Tyme, J., 1978, *Motorways versus Democracy*, Macmillan Press).

The fact that a professional report on the potential effects of Mountfield Park on local traffic, commissioned by the Alliance of Canterbury Residents Association, cannot even be admitted as evidence by CCC and KCC makes it very clear that nothing has changed since David Widdicombe made his plea.

CCC – make *use* of local people – engage properly – we are the ones who vote, and the ones who pay. Get real, get a grip. This plan simply will not do. Even Michael Gove might agree.

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