



## CANTERBURY SDG FORUM Additional Submission to Canterbury City Council's Consultation Reviewing The Local Plan Our Future District 2040 September 2020

This paper is submitted by Canterbury SDG Forum as a contribution to the consultation in September 2020 on preparing a new Canterbury District Local Plan. We have submitted a response to the on-line questionnaire, and in this paper we wish to elaborate on what we have said in the opening sections of the questionnaire, where the word limit is particularly constraining. We ask that the paper should be considered along with our questionnaire response.

### WHO WE ARE

Canterbury SDG Forum is a coalition of individuals and local groups in the Canterbury district with the aim of:

1. promoting public awareness of the UN Sustainable Development Goals for 2030, and encouraging individuals and groups to reflect the Goals in their own behaviour;
2. advocacy for the SDGs and their localisation, lobbying local, regional and national government to adopt policies guided and informed by the Goals.

Among the organisations represented in the Forum are the United Nations Association Canterbury Branch, Canterbury Soroptimists, the Canterbury Society, the Alliance of Canterbury Residents' Associations, the sustainability teams of Canterbury Christ Church University and the University of Kent, Canterbury District Inter-Faith Action (CANDIFA), the Church of England Canterbury Diocese, and the Mothers' Union.

### THE LOCAL PLAN AND THE SUSTAINABLE DEVELOPMENT GOALS

Canterbury SDG Forum would like to see a commitment to sustainability at the heart of the Local Plan. What is needed is an integrated overall vision of the kind of district we all want. The focus should be on planning for a **sustainable district**. The UN Sustainable Development Goals provide an ideal way to frame this vision. They bring together issues of environmental sustainability (including not only climate change but also the biodiversity crisis and other threats to the natural world) with social sustainability (e.g. meeting the needs of age, mobility, disability and gender as well as addressing the unsustainability of divided communities) and economic sustainability (how to adapt to changing patterns of employment and economic activity without destroying the planet in the process). Some local councils in the UK have mapped their own plans onto the SDG framework, and we strongly recommend that CCC should do the same. Doing so would serve to locate a vision for our district within a larger national and global vision.

To take that process forward, we make two procedural requests. We ask CCC to:

- **Appoint a councillor as SDG champion**
- **Conduct a Voluntary Local Review of SDG implementation in the district**

One example of a local council which is preparing its new Local Plan by reference to the SDGs is Southend-on-sea Borough Council, whose approach can be seen at:

<https://localplan.southend.gov.uk/issues-and-options/introduction/introduction>

As an example of a Voluntary Local Review, we would refer to that of Bristol City Council, whose Review can be consulted at

<https://www.bristol.ac.uk/media-library/sites/cabot-institute-2018/documents/BRISTOL%20AND%20THE%20SDGS.pdf>

The Cabot Institute at the University of Bristol has produced a handbook on conducting a Voluntary Local Review, which can be accessed at:

<https://www.bristol.ac.uk/media-library/sites/cabot-institute-2018/documents/uk-cities-voluntary-local-review-handbook.pdf>

The Local Government Association has published a guide for local councils on how to link the global goals with local communities. This document refers to Canterbury as an example of grass-roots engagement, where councils are recognising momentum building in the business and civil society communities – like in... Canterbury (p.11)... Sometimes it has been local organisations or alliances of organisations who have taken the initiative on the SDGs in their community, such as... Canterbury SDG Forum, who then tried to involve their council as a key local player (p.19).

<https://www.local.gov.uk/un-sustainable-development-goals-guide-councils>

We remain keen to build on that engagement, and we hope that CCC will work with us and with other community groups and local organisations to create a Local Plan which reflects the needs and aspirations of the whole local community.

## **A BROAD UNDERSTANDING OF SUSTAINABILITY**

Underpinning the Local Plan should be a broad understanding of *sustainability*. This includes the urgent need to take action to combat climate change, but it also goes much wider than that. The climate change crisis is inextricably linked to the biodiversity crisis, and it is important that climate action should look to nature based solutions and avoid the folly of policies that sacrifice the natural environment for the sake of carbon reduction narrowly conceived. 'Sustainability' also ranges more widely than environmental stability. As we have said, it embraces also social sustainability and economic sustainability. The needs of one section of a community must not be met at the expense of other sections of the community. Such injustices are not sustainable.

A key strategy in achieving greater sustainability is to aim for greater resilience. We are currently reliant on long (often international) supply chains for essential goods — via pipeline or cable, road, rail, sea or air — for food, energy, products, materials for building and manufacture, clothes, etc. We are reliant on a few large companies and organisations for employment. The Covid-19 pandemic has made us acutely aware of the danger if these supplies or services become blocked. We are not at all resilient when a crisis strikes. We should therefore aim to source many of these essential goods locally, encouraging local food production, local manufacture of products, local renewable energy generation (perhaps community-owned), and a greater diversity of small to medium sized employers. Sustainability and resilience must go hand in hand. CCC's Local Plan should reflect this in its policies for the local economy and employment.

All of the SDGs can help to fill out this broader vision of sustainability, but the following Goals are particularly pertinent to the sections of the Local Plan questionnaire:

Climate change challenges:

SDG 13 – Take urgent action to combat climate change and its impacts

Housing and new communities:

SDG 11, especially 11.1 – Ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums

Local economy and employment:

SDG 8 – Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

Movement and transportation:

SDG 11.2 – Provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by improving public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons

Town centres and local facilities:

SDG 11 – Make cities and human settlements inclusive, safe, resilient and sustainable

Historic and natural environment:

SDG 11.4 – Strengthen efforts to protect and safeguard the world's cultural and natural heritage

SDG 14 – Conserve and sustainably use the oceans, seas and maritime resources...

SDG 15 – Protect, restore and promote sustainable use of terrestrial ecosystems... and halt biodiversity loss

Cross-cutting with all the SDGs and running through the broad vision of sustainability are

SDG 1: End poverty in all its forms everywhere

SDG 5: Achieve gender equality and empower all women and girls

SDG 10: Reduce inequality within and among countries

SDG 17: Revitalise the global partnership for sustainable development

These goals all give expression to the pledge made by the 193 United Nations Member States, when they adopted the SDGs and the 2030 Agenda for Sustainable Development, to ensure "no one will be left behind". Those words recognise that development is not sustainable if the needs of some are met at the expense of the needs of others. The Covid-19 lockdown has revealed how much poverty there is in the UK and locally, including in our district. The challenges of recovery have forced us all to envisage a different world which is more resilient and more sustainable.

Partnership for the goals, as stated in SDG 17, should underpin the process for achieving local action on sustainability, and CCC's engagement at regional, government and international level.

SDG 17.17 - Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnership. In that spirit we ask CCC to work with local community organisations including the SDG Forum to pursue, through the Local Plan, a shared

vision for a sustainable district.

SDG 17.16 - "Enhance the global partnership for sustainable development... to support the achievement of the sustainable development goals in all countries, in particular developing countries. The Canterbury UNA Branch and the SDG Forum are working on an SDG-based link between Canterbury and Entebbe in Uganda, to share ideas and experience, particularly on climate action, and we ask CCC to support this link."

## **WHAT MAIN CHANGES**

Our understanding of sustainability and the SDGs leads to our answers in this section of the questionnaire:

### **What main changes would you like to see in the district over the next 20 years?**

- A clear commitment and a visionary approach to protecting and enhancing the natural environment. This would involve: greening urban areas; protecting functioning ecosystems and restoring degraded ones; creating wildlife corridors to connect existing habitats; protecting natural carbon sinks and enhancing the capacity of the natural environment to cope with extreme weather events.
- A commitment to tackling the problems of traffic and congestion, including a segregated and integrated cycle route network, and better provision for public transport.
- A commitment to tackling poverty and inequality, including improved facilities for the more disadvantaged areas of the district, and more housing which is genuinely affordable.
- A commitment to sustainability should be at the heart of the Local Plan. The experience of the Covid-19 epidemic, and the challenges of recovery, have forced us all to envisage a different world which is more resilient and more sustainable.

We recognise the extremely difficult financial position which the Council is facing, as a result first of the withdrawal of central government funding, and then of the economic consequences of the Covid-19 epidemic. The pursuit of a positive vision for the district will be extremely challenging. To bring about the changes that are needed, CCC will need to join with KCC and other local government bodies to lobby for increased funding and greater powers, giving it the financial and other resources to perform its tasks and be less dependent on centralised control by Whitehall.

## **CLIMATE CHANGE**

In the light of what we have said, we wish to elaborate our answers to the question:

### **What are the climate change challenges for our district and how might these be addressed?**

#### **The challenges are:**

- The need to ensure that climate change, air quality, and other environmental considerations are put front and centre of the new Local Plan;
- The need to cut carbon emissions;
- The need to promote renewable energy generation;
- The need to rethink our urban environment to make it more habitable in a hotter climate;
- The need to make it easier for biodiversity to survive in, and adapt to, a warming climate;
- The need to protect existing natural carbon sinks and create new ones;
- The need to minimise the impact of more unpredictable and more extreme weather events.

#### **To address these challenges, CCC should**

- Set 5 year carbon budgets and associated emission reduction plans for both the Council and the District.
- Ensure that all new buildings are net zero carbon in use, and commit to a retro-fit plan for all existing public sector, domestic and commercial buildings with the aim of ensuring that all existing buildings are as near to zero carbon in use as is practically possible. This will require massive financial support from central government to provide financial assistance/ encouragement for the required energy efficiency measures. CCC should lobby for such funds.
- Include sites for renewable energy generation in the Plan, and create opportunities for decentralised networks such as district heating and energy storage and the setting up of an investment programme to support these.
- Tackle the problems of transport and traffic in ways which reduce carbon emissions, by working with KCC to deliver the 'modal shift' away from car use which has been promised in the Transport Strategy but not delivered.
- Amend the approach to planning so as to encourage urban greening to cool the urban environment, and facilitate travel by foot or bicycle. This will require more open spaces in residential and retail areas, more green corridors, more hedge planting, a substantial increase in the urban tree canopy, the introduction of green roofs and green walls, more water features etc.
- Create a Nature Recovery Network, as advocated by the Wildlife Trusts. This will involve the

creation of a joined-up network of healthy habitats for animals and plants so that they can move more easily from one place to another and adapt to change.

- Protect natural carbon sinks (grassland, woodland, floodplains, saltmarsh, seagrass meadows etc) and create new ones by planting trees and hedgerows and by enhancing open spaces.
- Slow the flow of floodwaters by protecting existing floodplains and investing in nature-based approaches to flood management. Work with other local authorities and other agencies, including the water companies and the Environment Agency, to help to develop an integrated water resource management plan, making the district more resilient to the challenges of drought and flooding which are the likely effects of climate change. See [https://consult.defra.gov.uk/water/improving-management-of-water-in-the-environment/supporting\\_documents/floodwaterconsultation190114.pdf](https://consult.defra.gov.uk/water/improving-management-of-water-in-the-environment/supporting_documents/floodwaterconsultation190114.pdf)

We believe that a serious approach to tackling the challenges of climate change will require CCC to confront government policies and decisions (including the recent decision to allow flights to resume at Manston airport) which are in conflict with the council's declaration of a climate emergency and with the government's own commitments to action on climate change. We call on the council to address the challenges by working with the local community, including the Canterbury Climate Action Partnership, and we commend CCAP's submission to the Local Plan consultation.

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## Historic Environment Section

We also wish to expand on what we have said about 'Protecting Heritage' in the section on 'Historic and Natural Environment'.

SDG - 11.4 specifically underlines the need to protect cultural heritage, including the heritage of the built environment. We identify four issues with implications for the Local Plan and suggest some actions which should be taken in response to each issue.

### 1 Conserve the historic environment

There is an increasingly serious issue about conserving heritage in a place such as Canterbury, dependent as it is on tourism and on higher education. Visitors and students are attracted by a well-cared for historic city. However, cut-backs in local authority funding risk the dilution and degradation of the city's historic character. This can occur through the neglect of historic buildings and spaces or through the cumulative impact of individually small low quality developments. (See: Historic England (2015) *Managing Significance in Decision Taking in the Historic Environment - Good Practice in Planning* 2, Section 106)

#### Action

We urge CCC to adopt the stance described in Section 83 of the above document, which asks that each development in a conservation area makes a positive contribution to the conservation area character, rather than merely avoiding harm.

It is also important to recognise that existing non-heritage buildings can contribute to the character and cultural heritage of a particular neighbourhood. They should not be dismissed as irrelevant because they are not listed. This applies, for example, along the New Dover Road and elsewhere, where unsympathetic infilling has changed for the worse a historic route into the city.

### 2 Staff for conservation and enforcement

The conservation team at the Council have achieved a lot in terms of producing the Heritage Strategy and Action Plan. However, additional funding and staffing will be needed if the Action Plan is to be implemented. This will involve both the conservation of existing heritage assets and the enforcement of high standards in alterations to existing buildings and in the building of new developments. Lack of funding has allowed some historic buildings and street spaces to become decrepit and neglected and has weakened enforcement powers.

#### Action

We urge the creation of a stronger Conservation and Appeals team. This is necessary in order to conserve Canterbury's rich heritage and to make decisions that are winnable at Appeal, by being based on wider ranging research and using legal personnel who will be able to be stronger in resisting massive commercial appeal teams.

### 3 Protect conservation areas

Historic cities like Canterbury are at risk from the changes proposed in the Planning White paper. Though conservation areas may in theory be protected, what happens in the zones identified for 'renewal' or 'growth' will impact on the areas which are supposedly protected. Massive developments in the suburbs of historic cities are already creating traffic congestion, air pollution and pressure on space in and around historic city centres, so destroying the historic environment which is supposed to be protected.

## **Action**

In order that development does not damage these protected areas it would be valuable to identify 'buffer zones', around conservation areas. These could be developed as part of Conservation Area Appraisals. These 'buffer zones' should both define and defend the qualities which make conservation areas valuable.

It will also be important to reduce the dominance of roads and cars in and around historic areas which were not built for motor traffic. This may mean narrowing roads, reducing traffic speeds, eliminating city centre roundabouts, prioritising walking and cycling, and so on.

## **4 Highlight the World Heritage Site (WHS)**

Canterbury has one of the few World Heritage Sites in the UK, bringing together the Cathedral, St Augustine's Abbey and St Martin's Church. However, at present the site itself is not well publicised. The revision of the Management Plan is long overdue and parts of the Christ Church Priory are on the English Heritage 'Buildings at Risk' register. The lack of an effective 'buffer zone' round the WHS means that new developments risk damaging the views of the WHS across the city. Taken as a whole, the WHS is neglected and does not contribute as much as it might to the attractiveness and prosperity of the city

## **Action**

The World Heritage Site Management Committee should take immediate steps to revise and update the Management Plan and to create an effective buffer zone around the site. It should also work with relevant local organisations to publicise the WHS so that it becomes a valued part of the tourist experience in the city.

These developments could be supported by an annual day conference of all stakeholders to review Canterbury's heritage and the management and publicising of the World Heritage Site.