

CPRE Kent comments for 'Our future district 2040: Issues Survey 2020'

What are the good things about the local area where you live and what could be improved?

The natural environment including:

- North Kent coastline AHLV
- The North Downs and Kent Downs AONB
- The nature reserves such as Stodmarsh RAMSAR site and Blean Woods National Nature Reserve
- The SSSIs
- The Stour valley
- Local wildlife sites

The landscaped setting of Canterbury's World Heritage site and the interrelationship between them.

With regard to what could be improved

- The integrity of the Stour valley urgently needs protecting by means of a long-term ecological vision, such as the Stour Valley Regional Park advocated by the Kentish Stour Countryside Partnership.
- Urban greening. Much greater recognition needs to be given to the importance of integrating nature into the fabric of our urban life (for example by means of green corridors between urban open spaces, tree planting along streets, hedge planting along the verges of busy roads, green roofs, green walls etc).
- Promote the creation of a Nature Recovery Network to:
 - i) increase the capacity of the natural environment to absorb carbon
 - ii) mitigate the effects of more extreme and volatile weather patterns
 - iii) create a network of habitats and green/wildlife corridors that will enable wildlife to migrate as needed in response to a warming climate. See <https://www.wildlifetrusts.org/nature-recovery-network>
- Greater care needs to be taken over the quality of the built environment
- Provide greater encouragement and support for neighbourhood planning for rural areas and city wards.

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

1. Greater use has been made of brownfield sites in suitable sustainable locations
2. Best and most versatile agricultural land has been safeguarded from development
3. Thriving and vibrant countryside and rural communities
4. Tranquil areas and areas benefiting from dark skies protected
5. Establishment of new public open spaces and protection and enhancement of green spaces
6. Improved design quality of new development that encourages good distinctive local design.
7. Greater consideration of the visual impact the countryside of development at the urban edges with regard to bulk / layout / perspective views / colours of materials
8. Action has been taken to improve air quality so that there is no need for AQMAs
9. New development is carbon neutral, has the highest energy efficiency standards, and aids reduction in water usage.
10. The Stour Valley in our view is under threat from insensitive development (for example housing and the Wincheap Park & Ride proposal); excessive abstraction; sewage surges, nitrate and phosphate pollution and agricultural run-off and would like to see the Valley protected from insensitive development.
11. Areas of High Landscape Value have been given the highest level of protection from development.

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

1 The government committed to eradicating net climate change by 2050. The review Plan's allocations and policies will need to be prepared with this in mind. There is a need for a locational strategy for new development that supports and promotes active travel and public transport.

2 Transport:

- a) Increasing opportunities for active travel.
- b) Supporting improved regular public transport serving rural communities.
- c) Facilitating the change towards electric / hydrogen powered vehicles. This would involve the need for solar panels on roofs to aid the National Grid. Design homes so that electric charging points are included or can be easily installed retrospectively. The need to support and encourage fast charging electric chargers in new developments.
- d) Ensure that funding for public transport and active travel is costed and funded with delivery dates [https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-villagevisions.pdf, June 2020]
- e) Support a discounted integrated public transport payment process

3 Energy:

- a) Improved energy efficiency for new homes to reduce demand for new energy supplies, lowering electricity bills and lifting residents out of fuel poverty.
- b) Given government aim to phase out petrol and diesel vehicles and move towards electric cars solar panels on homes would help support the National Grid. The present guidance means that homes can be deemed energy efficient without the need for solar panels.
- c) New homes should be designed with electric car charging points either installed prior to sale or with a layout that enables easy retrospective installation by occupiers.
- d) Need to support and encourage fast charging electric vehicle chargers in new development.
- e) Need for aesthetic controls of solar panels and wind farms etc

4 Water supply:

- a) Kent is water stressed and the scale of new development across the county will need consideration.
- b) It is noted that SE Water propose a new reservoir at Broad Oak by 2033. The scale of new development over the Plan period should reflect the reservoir's delivery timetable.
- c) It will be important to ensure water resilience for existing and future population as well as farming and the natural environment.
- d) Will need water reduction measures that can be maintained. Some water reduction measures, such as water efficient machines are often expensive and may not be replaced by like for like and may therefore not result in the expected reduction in water consumption. In conjunction with the SE Water and housebuilders consider initiatives such as charging different rates for summer and winter to help reduce demand and benefit householders with lower water bills.

5 Re-use of suitable brownfield sites in sustainable locations where this would help deliver homes closer to services, workplaces, public transport and active travel routes.

6 The creation, protection and enhancement of green spaces are crucial for tackling the climate change emergency and for providing the 'countryside next door' that is essential for our wellbeing.

7 The need to maximise the landscapes' ability to capture carbon through natural processes. This should be done in ways that complement and enhance their unique character, respect nature and support sustainable local economies. (<https://www.cpre.org.uk/wp-content/uploads/2020/07/Greener-Better-Faster-July-2020.pdf>)

8 The Council's Climate Emergency declaration makes no reference to the natural environment. This is a major omission. The Local Plan provides a critical opportunity to respond to the challenges that climate change poses to biodiversity, and to maximise the potential of the natural environment to mitigate the impacts of climate change. As mentioned above, these should include:

- a) Greening up of our urban environment to make it more habitable in a hotter climate
- b) Making it easier for biodiversity to survive in, and adapt to, a warming climate (for example by means of a Nature Recovery Network)
- c) Protecting existing carbon sinks (for example grassland, woodland, floodplains saltmarshes etc) and creating new ones
- d) Minimise the impact of more unpredictable and extreme weather events, for example by slowing the flow of floodwaters by protecting and enhancing natural floodplains

9 Promote forms of alternative energy generation that have low impacts on the surrounding landscapes.

10 Promote the retrofitting of insulation to older properties ensuring that this does not compromise their appearance and weather resisting properties.

11 Promote housing that meets the Passivhaus standard.

Housing and new communities

Issue 1 New housing is not just about meeting housing numbers. It is about creating community. Places where people want to live and stay.

What do you think should be done to address this issue?

1. The need for a thriving countryside with sustainable rural communities that are more than commuter settlements. Any new residential development should provide a mix of housing type and not just large 'executive' property.
2. Putting Health in Place (2019) [<https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-executive-summary.pdf> and <https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-2-design-deliver-manage.pdf>] concludes that new places should create the conditions for social and economic connections to take root and grow, and that these connections are more likely to be successful when places are compact, walkable and mixed-use and have a distinct identity. Provide services such as shops, medical centres, schools, community facilities, along with active travel and public transport services early on in the development to encourage and support sustainable lifestyles. Chafford Hundreds in Essex, a 6,000 dwelling development provided shops and doctors surgery in portacabins in the early phase which, at a later date were replaced by permanent facilities.
3. Covid19 has shown the importance of quality green spaces within and adjacent to residential areas. Public open space within / serving new developments should be provided in line with the scale of housing as it is built out, and not at the end of a development: this is particularly important for people living in flatted developments. POS and green spaces need protecting.
4. New development should foster community-building. Avoid allocating land on either side of busy roads as this results in bisecting communities. An example of this is Hersden where the adopted local plan allocated housing either side of the A28 and sites south of the A28 not allocated in the local plan have been permitted. This has resulted in the expanded village being split by the busy A28. This approach undermines community-building rather than fostering it.
5. Given the need for housing in locations with good walking access to local facilities, the regeneration of the Wincheap industrial estate as a mixed-use development with high density housing overlooking the Stour floodplain (but not on it) would appear to be a sensible option. The development should be built to high ecological and social standards, such as the award-winning Goldsmith Street development in Norwich.

NHS England has identified poor diet as the biggest avoidable cause of ill health in England and it is associated with heart disease, stroke, cancers and type 2 diabetes [<https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-executive-summary.pdf>]. Encourage the introduction of 'Incredible edible' in new developments [<https://www.incredibleedible.org.uk/>].

Issue 2 Affordable housing:

- a) Covid19 has reminded us how important essential service workers are to our health and happiness. There is a need for more dedicated keyworker housing. These workers can be priced out of rural areas, undermining the resilience of countryside communities. Rural affordable housing needs to be protected in perpetuity. The Government's 1st Homes initiative as a way of providing lower cost homes in the countryside.
- b) Lack of provision of affordable housing: The adopted Local Plan requires 30% affordable housing from schemes of a certain size. KCC Affordable Housing 2018-29 Bulletin February 2020 shows that for the period 2014-19 the amount of affordable housing provided via new development was just 12.4% and that an additional 370 affordable homes were provided. The Council's Annual Monitoring Report April 2018 to March 2019 shows that the number of people on the Housing Needs Register rose by 258 over the period 2014 -2019. KCC Right to Buy in Kent 2019 Bulletin July 2020 shows that for the same period 150 homes were purchased under right to buy.
- c) *What do you think should be done to address this issue?*
 - a) Provide more dedicated keyworker housing and invest in rural social housing that is retained in perpetuity.
 - b) Raise the delivery rate of affordable housing.

Issue 3 Population change and household need. The recent ONS 2018-based population and household projections for the district indicate a reduction in estimated population and household need over that identified in the 2014-based projections. The recent projections indicate there will be an increase in the 75+ population and their need for housing over the period 2018-2043 will be +9,488 households out of an additional 11,718 households.

What do you think should be done to address this issue? Need to consider future housing need, including C2 accommodation in suitable locations.

Issue 4 Student accommodation: The impact of present student population on the local housing market and the impact of Covid 19 /Brexit on how the universities will deliver courses in the future and the impact this will have on the amount of student accommodation required.

What do you think should be done to address this issue?

- a) Discussion with universities on the matter and if there will be no change then the universities should provide more purpose-built accommodation.
- b) All new student housing should have the structural flexibility of change of use to affordable housing.

Issue 5 Allocate a mix of size of housing sites. Large housing sites take longer to bring forward, give dominance to large national developers who replicate their national palate of house designs that rarely reflect local distinctiveness.

What do you think should be done to address this issue? Allocate smaller sites to encourage smaller, local builders, and self-builders.

Local economy and employment

Issue 1 Are there opportunities to create jobs suitable for existing and new residents to enable people to live closer to where they work?

What do you think should be done to address this issue?

- Improve public transport and active travel routes.
- Provide housing near(er) to employment.
- The potential for greater home working.
- Provide community hub workspaces and high-quality broadband connections in rural areas to facilitate remote working.

Issue 2 The recent decision regarding Manston airport.

What do you think should be done to address this issue? Consider how this will impact on the district's economically active residents and transport consequences – need for improved bus services, and location of new housing.

Issue 3 The role of the rural economy

What do you think should be done to address this issue? Aiding the rural economy can help reinvigorate the general economy. This could include:

- Providing fast, reliable, rural broadband to support rural businesses and home working.
- Provide community hub workspaces
- Providing housing in villages, of a scale appropriate to the settlement, to support the retention of existing services or broaden the range for the benefit of residents.

Issue 4 The impact of Covid 19 on working practices. It has shown that for certain employment sectors it is possible for people to work from home. Will people continue working from home; and will there be need for as much office space?

What do you think should be done to address this issue?

The continuing provision of the fastest broadband including in the rural area.

Where office space is no longer required in purpose-built offices consider its use for alternative uses including residential and supporting services such as gyms, hairdressers, or small start-up businesses.

Issue 5 The impact of Covid 19 on higher education. There may be a decline in the number of students on full-time three-year residential courses. This would result in fewer people in the flexible labour market. It could also affect the local economy such as the evening / night-time economy and high street shops.

What do you think should be done to address this issue? Consider the implications for the City Centre and local centres where there are currently concentrations of students.

Movement and transportation

Issue 1 The need for the plan's development location strategy to be underpinned by active travel and regular walk-on public transport.

What do you think should be done to address this issue?

- Siting new development in locations well supported by, or that will support, sustainable transport will help achieve this. This local plan should promote development in locations well served by regular public transport services and social and community facilities, that are in safe walking and cycling distance or would support, or result in, a sustainable settlement. Such routes need to feel safe, be well lit, especially for children and women who have to use them after dark – otherwise cars will be the preferred mode of transport.
- New development should be underpinned by active travel and public transport links to be available from the start to provide the opportunity for residents to use non-car modes of transport from the start. Ensure that funding for public transport and active travel is costed and funded with delivery dates. The recent Transport for new homes report which looked at Garden Villages and Garden Towns found that they were car dependent resulting in more traffic on roads and the need for massive investment in road capacity; that whilst public transport was very popular it was underfunded as was cycling. [<https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-villagevisions.pdf>, June 2020].
- Introduce an integrated transport system with discounted credit card payments systems. This could also provide data to understand transport choices and usage.
- Use housing density to support active travel and public transport to help reduce people's reliance on the private car.
- Public transport:
 - Promote innovative and experimental forms of public transport
 - Implement the existing proposals to create an Integrated Public Transport Hub at Canterbury West station.
 - The existing bus station is at capacity. It would be helpful to provide smaller bus hubs around the city as they have done in York.
- Cycling:
 - Make canterbury a cycle-friendly city
 - Introduce a scheme within the city for rentable bikes for example London.
 - Main Roads need to be made safer and more pleasant to encourage cycling
- Walking:
 - Main Roads need to be made safer and more pleasant to encourage walking
 - Provide pedestrian crossings across busy roads to facilitate movement
- The provision of services, such as shops, health care and schools, early in the development can help establish people's travel patterns.
- Encourage the establishment of car club schemes.
- The Park and Ride sites are too close to the city centre and should be located further out and be designed and located for minimum impact on the rural environment.

Issue 2 Improved rural public transport.

What do you think should be done to address this issue? Create a ring-fenced rural transport fund to support public transport services for rural communities that need to be connected. CPRE Greener-Better-Faster July 2020. [<https://www.cpre.org.uk/wp-content/uploads/2020/07/Greener-Better-Faster-July-2020.pdf>]

Issue 3 Air quality

What do you think should be done to address this issue? The location of new development should not make existing AQMAs worse, nor areas of higher air pollution, nor result in the need for AQMAs to be declared. Consider the cumulative effects of allocated / allocations on air quality.

Issue 4 The impact of lorries on local communities

What do you think should be done to address this issue? It is important to find ways to reduce the number of lorries on the roads and to encourage more electric vans as alternatives.

Issue 5 Communication about transport issues

What do you think should be done to address this issue? Improve the communications interface on transport issues between Highways England, Kent Highways, the council, transport providers and the community.

Town centres and local facilities

Issue 1 The role of village centres / local facilities in villages and smaller settlements. Healthy and viable local facilities can help support village life reducing the need to travel by car to larger centres and provide employment for local people.

What do you think should be done to address this issue? Need for the local plan to support village life. Where appropriate this may result in suitably located additional housing appropriate in scale with the settlement, reflecting local need, including affordable housing.

Issue 2 Online / e- shopping. An article by Retail Insight Network (21 August 2019) stated that more than half of UK consumers are now shopping online and UK online spend is forecast to increase 29.6% between 2019-2024 according to retail analysts at Global Data. Lockdown has resulted in increased online sales and has most likely triggered a permanent shift to online shopping.

What do you think should be done to address this issue? Consider alternative roles for city and local centres.

Historic and natural environment

Issue 1 The need to conserve and enhance the landscape and natural beauty of the countryside, especially the Kent Downs AONB and its setting.

What do you think should be done to address this issue?

1. Resist allocating land within the AONB. Include policies which support the AONB Management Plan.
2. There needs to be much greater respect for local character assessments and biodiversity appraisals.

Issue 2 Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation; and protect tranquil areas.

What do you think should be done to address this issue?

1. Resist / limit development within areas of intrinsically dark landscapes. CPRE Dark skies mapping can help identify areas within the district that benefit from dark skies. This can be found at <https://www.nightblight.cpre.org.uk/maps/>. Include a development management policy requiring lighting within new development to resist increased light pollution.
2. Establish a district lighting code which not only gives constraints for areas protected for nature, landscape and heritage, but also for impacts on human health.
3. Resist / limit development within tranquil areas. CPRE tranquility mapping can help identify tranquil areas in the district.

Issue 3 The need to safeguard best and most versatile agricultural land (BMV). This is a finite national resource and there is a high percentage in the district.

What do you think should be done to address this issue? BMV land should not be allocated for development.

Issue 4: The design of developments on the boundary between urban areas and the countryside

What do you think should be done to address this issue? Care needs to be taken about matters such as materials, vistas, impact on the skyline, landscaping.

Issue 5: The Stour valley. The Stour is one of only 210 chalk streams in the world and a globally important ecosystem. And yet increasing urbanisation, abstraction and pollution (both from agricultural sources and from sewage surges) are causing serious damage.

What do you think should be done to address this issue? The district needs to develop a long-term vision for the Stour which recognises its ecological significance and also its huge recreational value. This vision could be in the form of the Stour Valley Regional Park as recommended by the Kentish Stour Countryside Partnership. Given the likelihood of more extreme and unpredictable weather events, the capacity of the Stour's floodplain to slow the flow of floodwater should be enhanced. Far from converting the Wincheap Water Meadows into a car park, the Council should be investing in ecosystem restoration of this critically important part of the floodplain upstream from Canterbury so that its capacity to store flood water is improved and its value for biodiversity is enhanced.