

# New Local Plan 2040 – Issues Survey

## Introduction

1. These representations have been prepared by Nexus Planning, on behalf of Hallam Land Management (“HLM”), in response to Canterbury City Council’s New Local Plan (2040) Issues Survey

## What are the issues for housing and creating new communities over the next 20 years?

2. The consultation document on the emerging Local Plan rightly highlights that in 2019, the average house price in the District was more than 10 times average local earnings. The existing standard method for calculating housing need (and indeed the revised method outlined within the Changes to the Current Planning System consultation) is clear that upwards adjustments to housing need are required where the ratio between the house prices and average earnings is more than four, as four times a person’s earnings is the maximum amount that can typically be borrowed for a mortgage (paragraph 36 of the Changes to the Current Planning System consultation). It is therefore clear that the affordability ratio in the District is very high and this is major barrier to home ownership. This can however be addressed by providing the right number of homes as support by the Changes to the Current Planning System consultation which states that *“the affordability of homes is the best evidence that supply is not keeping up with demand”* (paragraph 31).
3. The draft revised standard method now places a greater emphasis on affordability than the current standard method and includes an analysis of the affordability trend over a 10-year period to better understand the ‘direction of travel’. In 2009, the District affordability ratio was 7.37 and in 2019 it was 10.65 – a clear and material increase over this period. The lack of affordability in the District peaked at 11.12 in 2017 and has reduced in the two subsequent years, albeit at a very slow rate. It is therefore demonstrable that the existing housing requirement within the adopted Local Plan of 800 dwellings per annum (“dpa”) is not sufficient to materially improve affordability and must substantially increase through this review.
4. Paragraph 60 of the NPPF states that *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method...”* (emphasis added)

5. Calculating housing need using the Government's current standard method would generate a figure of 1,120 dpa – a 39% increase against the adopted housing requirement. Using the Government's revised standard method (which it would appear will be necessary based upon transitional arrangements) increases this figure further to 1,125 dpa. Accordingly, it is clear that housing need in the District over the next plan period will be substantial and notably higher than levels currently planned for.
6. Paragraph 60 of the NPPF states that *"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."* Further, paragraph 35a outlines that in order for plans to be found sound, they must be *"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"*.
7. We have reviewed the implications of the revised standard method for authorities in the East Kent area that adjoin the Canterbury City boundary and note that almost every authority is likely to see a substantial increase in housing need. With such a significant increase in housing need across the area in general, it may not be possible for each authority to meet its development needs in full and therefore the Council must work with neighbouring authorities at an early stage to establish whether any unmet needs are likely to arise and if so, how these could be accommodated.
8. The adopted Canterbury District Local Plan ("CDLP") sets out at Policy SP4 that Canterbury, Herne Bay and Whitstable will be the *"principal focus for development"*. It is therefore clear that these settlements are the most sustainable in the District.
9. Paragraph 1.48 of the CDLP references the Council's Settlement Hierarchy Study (2011) noting that it recommended there should be a sequential approach to the allocation of land for development. In particular it states that *"...new housing development should primarily be concentrated in the urban centres of the District, with new development in the rural settlements limited, proportionate to their scale and position in the settlement hierarchy."*
10. Paragraph 59 of the NPPF states that *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed"* Furthermore, paragraph 103 outlines that *"The planning system should actively manage patterns of growth"* and that *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."* Accordingly it is clear that national planning policy continues to support the Council's historic growth agenda of focusing the majority of growth in and on the edge of the largest and most sustainable settlements in the District – Canterbury, Herne Bay and Whitstable. This is an approach we support.
11. Given that the development needs contained within the CDLP already required the release of greenfield sites, it is clear that further greenfield sites will need to be released to accommodate the

substantial increase in housing need and the Council would need to carefully consider the sustainability merits of accommodating further development on the edge of the three principal settlements.

12. Whilst the new Local Plan will need to accommodate a number of smaller sites to accommodate at least 10% of the Council's housing requirement in line with national policy (paragraph 68a of the NPPF), smaller sites (even including those with capacity to accommodate a few hundred homes) do not typically provide much if any on-site infrastructure. However, paragraph 72 of the NPPF outlines that *"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities."*

13. In this context, sizeable residential-led mixed use development that has the opportunity to incorporate significant blue/green infrastructure as well as new services and facilities for the existing and future residents of settlements should be a priority. There are areas of land adjacent the principal settlements within the District that are inherently sustainable locations for growth and offer logical extension/rounding of the settlements. In responding to the issues and opportunities identified within the consultation document, these types of sites could deliver a substantial quantum of market and affordable homes in a range of sizes and types to respond to the needs of specific grounds. These homes should also benefit from extensive access to high quality green spaces and recreational areas, promoting health and well-being. Visions can then be established that sets out how a high-quality place for people to live can be delivered, that is well-designed (including providing opportunities for self-build), integrated with the existing community and importantly provides convenient access to a range of services and facilities, including new infrastructure, as required.

#### **What issues need to be addressed for our local economy and employment over the next 20 years?**

14. The consultation document identifies that the new District Plan provides an opportunity to *"address any key barriers to investment, such as infrastructure problems or the availability of suitable land for development."* Importantly, it notes that *"this is even more important now given the current global health emergency."*

15. Whilst the above is true, the District Plan must also ensure that it continues to provide sufficient homes that are of the right type and in the right place to attract the workforce. This can, in part, be achieved by locating new high quality homes in accessible locations, such as Whitstable and Herne Bay.

16. A further challenge for the economy during the early part of the new plan period will be addressing increased unemployment as a result of the pandemic. However, the construction industry and in particular housebuilding has the potential to create new jobs and offer a significant economic boost. Indeed, page 13 of the document entitled 'The Economic Footprint of UK House Building' published in March 2018 by the House Builders Federation confirms that the scale of employment

supported by housing building is equivalent to between 2.4 and 3.1 direct, indirect and induced jobs per new dwelling built.

#### **What issues need to be addressed for our town centres and local facilities over the next 20 years?**

17. The challenges that are likely to face our town centres and local facilities over the next 20 years are multi-faceted and complex. We already know that many town centres were already struggling to adapt to changing lifestyles and more recently particular uses have been hit hard by the COVID-19 pandemic. It will also take time to see the effect on the high street of the recent changes to the Use Classes Order.
18. The CDLP identifies at paragraph 4.9 that the Whitstable and Herne Bay District Centres fulfil a complementary role to Canterbury City Centre in the established retail hierarchy. It goes on to state that *"They serve the local population and ensure a sustainable focus and pattern for development and their position within retail hierarchy will continue to ensure they have opportunities to enhance and strengthen this function."*
19. Locally specific initiatives will no doubt be required to ensure the continued viability and vitality of the aforementioned District Centres and the same can be said for local facilities. However, a critical element to any strategy will be to ensure that sufficient housing growth of the right type is planned in and around locations such as Whitstable and Herne Bay to ensure that existing communities can remain in the area and that new residents can move in. This will ensure that settlements retain a diverse range of households and retain their position in the settlement hierarchy.
20. The above is also largely applicable in the context of the provision of local facilities however this is in the context of retain existing facilities, rather than providing new ones. Smaller scale residential development may generate demand for services and facilities but invariably provide such infrastructure. Accordingly, it is important that the Council consider a range of site allocations but specifically large scale sites that have the physical capacity, critical mass and overall viability to support the provision of new services and facilities.

#### **What issues need to be addressed for movement and transportation over the next 20 years?**

21. As has been identified earlier in our representations, the District and wider East Kent area is facing a substantial increase in housing need and the challenge for the Council (and neighbouring authorities) will be accommodating this in sustainable manner.
22. The consultation document identifies that the CDLP sets out a hierarchy of transport modes, starting with walking and cycling as the priority, all the way down to the use of the private car as the lowest priority. The consultation rightly points out that *"In practice this means that new development should be located in areas which minimise the need to travel and which enable people to meet most of their day to day needs in the local area."* The provision of urban extensions on the edge of the most sustainable settlements has proved a long standing and successful way to promote sustainable travel across the country and has been the strategy employed in the District through the CDLP.

23. Whilst opportunities might present to create new communities that can make a location sustainable, such initiatives typically require substantial infrastructure investment, suffer from viability challenges and have long lead-in times. Conversely, urban extensions can in many cases be delivered within the relative short term and without the upfront need for significant new infrastructure. It would therefore be appropriate for the Council to continue to pursue a strategy of focusing the majority of growth around the most sustainable settlements. This is further supported by the NPPF which at paragraph 103 states *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”* and at paragraph 104a where it states that planning policies should *“support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.”*
24. Land on the edge of Canterbury, Whitstable and Herne Bay can provide these opportunities to deliver significant housing being the most sustainable settlements in the District. There are sites located within walking and cycling distance of a range of services and facilities, including retail, convenience and employment facilities as well as recreational facilities, primary and secondary schools and a range of healthcare services. These large scale sites offer scope to deliver new local centres, primary school or other services on-site, if required. They can also offer substantial green infrastructure to the benefit of existing and new residents, promoting healthy communities and usually they offer the ability to connect to existing public transport, whether that be a range of bus services or railway stations.

#### **What issues need to be addressed for our historic and natural environment over the next 20 years?**

25. As is the case with every local planning authority, the Council will need to strike an appropriate balance between the need to meet development requirements against the need to protect the historic and natural environment.
26. The CDLP already requires the development of greenfield land to accommodate necessary growth and it is therefore clear that further development in the countryside will be necessary to accommodate the requirements of the emerging local plan. As the consultation document outlines, the District contains a range of environmental constraints including some 27% designated at the Kent Downs Area of Outstanding Natural Beauty (AONB). Paragraph 172 of the NPPF is clear that *“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues”* (emphasis added).
27. There are also more local designations including Green Gaps and Areas of High Landscape Value. However, the NPPF is clear that *“Plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework”*. In this context, local landscape

designations would fall into a category of lower environmental or amenity value and must be balanced against other objectives of the NPPF, for example *“providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs”* (paragraph 35a) and supporting the Government’s objectives of *“significantly boosting the supply of homes”* (paragraph 59). Accordingly, local landscape designation should not in principle be seen as a reason to prevent otherwise sustainable development.

28. In terms of conserving and enhancing the historic environment, the District contains a range of heritage assets. Paragraph 193 of the NPPF outlines that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).”* Paragraph 194b outlines that assets of the highest significance include *“scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites”*. Accordingly, it is important to avoid developing sites that could impact upon such heritage assets.

29. The consultation document outlines that the District Plan will provide opportunities to *“secure improvements to our natural environment, so that new developments leave the environment in a measurably better state through a mechanism known as ‘biodiversity net gain’ ”*. It also outlines the importance of connecting *“natural areas together to create networks for wildlife and support biodiversity. This can enhance wildlife and habitats, while providing greater opportunities for people to access the natural environment.”* It is therefore important to ensure there is a focus on sites being green infrastructure led as this maximises the ability to deliver a net biodiversity gain.