



CANTERBURY DISTRICT LOCAL PLAN: PREFERRED OPTIONS CONSULTATION

CCAP RESPONSE

Introduction

Canterbury City Council has made good progress towards sustainability through the efforts to adopt the principles of Sustainable Development, in line with the National Planning Policy Framework (NPPF), and in light of the twin emergencies represented by climate change and biodiversity loss and much of this is reflected in the Local Plan proposals, especially its strategic objectives. However, we seriously question the specific Preferred Option for development set out in the current Local Plan proposals.

The CCAP Board met in July 2021 to review the draft district vision and agree alternative options for the new Local Plan. We welcome the opportunity to respond to the consultation. In addition to completing the online questionnaire, we would like to make a formal response as set out below. It is our hope that there will be an early opportunity for CCAP to meet with Council Officers and Councillors to discuss our concerns further and receive clarifications on the issues raised.

Endorsement of the positive initiatives

We are encouraged at the extent to which the aims and ambitions of the Climate Change Action Plan are integrated into detailed Local Plan strategic objectives, such as ‘how developments are to be designed to address the impacts of climate change.’¹ We would like in particular to endorse the positive proposals outlined in ‘Construction Carbon Emissions and Energy Standards’ towards:

- *A net zero operational energy standard for new buildings*
- *A requirement to evaluate the embodied carbon for planning applications*
- *New standards to improve the whole building energy efficiency for modifications to existing buildings.*²

We would also like to endorse the positive proposals outlined in ‘Development Options Carbon Emissions’ towards:

- *Implementing policy for planned developments to evaluate the embodied carbon emissions*
- *The planning authority to maintain a register of embodied carbon emissions from approved and completed developments*
- *The Local Plan set net zero operational emissions standards for new development in the district*
- *Life cycle carbon assessments are undertaken for the road infrastructure schemes as per Highways England SA 119 Climate in order to determine their contribution to district emissions reduction.*³

¹ <https://localplan.canterbury.gov.uk/>

² CDLP2040-CC02

³ CDLP2040-CC03

These are very encouraging proposals that will help the City Council achieve its stated objectives of reducing carbon emissions to net zero by 2030. We urge the Council to commit to the implementation of these policies when developers object on grounds of viability.

We welcome the recommendations to identify *‘priority areas for investment in renewable energy generation infrastructure across the district within the local plan along with more proactive policy to encourage and enable renewable energy installations within the Local Plan 2040.’*⁴

We also welcome the proposal of the Climate Change Action Plan to *‘introduce new land management practices across our open spaces aiming to maximise their ability to remove carbon and optimise their biodiversity and resilience value.’*⁵

We applaud the City Council on its pledge in the Statement of Community Involvement *‘to make the planning process more accessible to everyone within the community including those who traditionally have not engaged or may have felt excluded from planning decisions.’*⁶ We look forward to seeing these aims become action and to see the representation of communities in all steps of the planning processes.

These are bold and exceedingly important ambitions that will help create a Canterbury that is seen as a model for other cities in how to plan for the future in these times of crisis. This really is the opportunity for Canterbury to shine and show how to create a more sustainable city and district post-Covid as CCAP has argued in its previous submissions.

Why CAAP opposes the ‘Preferred Option’ (Canterbury Focus C) and Canterbury Focus B

Upon review of the consultation Evidence & Strategies, especially the Sustainability Appraisal, we do not consider the ‘Preferred Option’ (Canterbury Focus C) or Canterbury Focus B suitable or appropriate for the Local Plan. In particular the proposed 17,000 new homes, implying a population increase of 40,800, based on average national household size of 2.4, will have major consequences on sustainability. Sustainability is conventionally considered in light of the Social, the Ecological, and the Economic (or People, Planet & Profit). The costs to all three domains of Canterbury Focus C (Preferred Option) and Canterbury Focus B, far outweigh the benefits. This is not only clear from our assessment of the plans, but it is indicated in the Sustainability Appraisal.

Having scrutinised the technical evidence documents that helped inform the Local Plan, it is difficult to see how Preferred Option (Canterbury Focus C) is in line with these commitments and policies on sustainability, decarbonisation and protection of biodiversity. In fact, it is likely, based on the findings of the Sustainability Appraisal Report, that the Preferred Option (Canterbury Focus C) will have *‘significant negative effects on Climate Change (SA Objective 2), Biodiversity (SA Objective 3), Landscape (SA Objective 5) and Land Use (SA Objective 11).’*⁷

In contrast, for example, Canterbury Focus Option A, which still provides the 9,000 dwellings which meets the minimum LHN figure identified in the HNA 2021, is identified as a more sustainable option within the Sustainability Appraisal, which concludes: *‘Overall, the magnitude of the positive and negative effects would be expected to be lower than the Preferred Option.’*⁸ It is therefore surprising that the Sustainability Appraisal does not recommend the most sustainable option.

⁴ CDLP2040-CC05 Local Plan 2040: Energy Paper

⁵ CANTERBURY CITY COUNCIL CLIMATE CHANGE ACTION PLAN 2021-2030 FINAL FOR ADOPTION 1.7

⁶ STATEMENT OF COMMUNITY INVOLVEMENT 2019

⁷ 42680-WOOD-XX-XX-RP-OP-0003_S4_P01.3, p.107

⁸ 42680-WOOD-XX-XX-RP-OP-0003_S4_P01.3, p.107

A more detailed review identified a number of significant concerns with the credibility of the Sustainability Appraisals findings. We are especially concerned that the Sustainability Appraisal has no assessment of the Eastern and Western Bypasses. There is no mention of the roads at all, only repeated descriptions of ‘significant upgrade to the A28.’ We find this absence of appraisal worrisome and urge the City Council not to proceed with such strategies until a full Sustainability Appraisal has been carried out.

This is worryingly repeated in the public-facing ‘Have Your Say’ questionnaire when presenting the growth options. For the Preferred Option: ‘To support this, there will be an extra 14,000 to 17,000 homes by 2040 and an upgrade to the A28 road.’ And for Canterbury focus B: ‘Significant upgrading of the A28 road so that through-traffic can bypass the city centre.’ We are deeply concerned that this is misleading and disguises from the public the full extent of proposed road construction.

We also question the reliance on Section 106 monies for infrastructure funding which seems uncertain in light of the changes under the proposed Planning Bill: ‘Planning for the Future.’ This argues that the current system of Section 106 agreements and Community Infrastructure Levy should be replaced by a nationally-set value-based flat rate charge (to be called the Infrastructure Levy), set at a single or varied rate.⁹

For a fuller explanation of our rationale for rejection, see **Appendix A**.

CAAP’s Alternative Vision for the District Local Plan

We welcome the opportunity to contribute to the draft vision for the District in the Local Plan. We would like to endorse – with reservations – both Canterbury Focus A and the New Freestanding Settlement. However we feel that the ONS data used as the basis for the Canterbury Housing Needs Assessment (HNA) requires more careful consideration in light of important recent national developments tilting planning debate towards greater sustainability. We recognise that the powers of the City Council are limited and that many decisions, including in respect of funding and infrastructure are taken at national or level or by Kent County Council; we are also aware of the severe funding restrictions facing local government especially post-Covid. We nonetheless urge the City Council to consider the Local Plan in light of the many developments related to Planning and Transport taking place nationally. These developments are already having major implications with regard planning applications, planning approval, funding, land use, and environmental standards

For a summary of relevant national developments see **Appendix B**.

Specifically, we would like to make the following recommendations for housing:

- Once the ONS data of population demographics is more robustly established, we recommend the construction of homes as required throughout the District, in Canterbury, the coastal towns and in the rural villages. These must be carefully located developments of mainly social and truly affordable homes on small/medium brownfield sites so that local communities are not swamped by development. They should be on sites determined by the planners in consultation with the community on the basis of need, rather than on the developer-oriented ‘call for sites’ process.
- Once the brownfield site developments have been considered, the remaining housing requirement, if any, should be given a zero-carbon, stand-alone eco-settlement based around an existing railway station in the District. Better still, the City Council should think regionally and consider working in partnership with neighbouring authorities such as Faversham and Thanet, to create a larger and more sustainable eco town.

⁹ Planning for the Future: planning policy changes in England in 2020 and future reforms p. 26

In respect of transport, we make the following recommendations:

Closing the inner ring road and giving over the space to cyclists and pedestrians is a positive aim of the Council's proposals and should be endorsed. However, it should not be at the expense of building new roads, given also that the evidence shows these generate more traffic flows. Rather, we suggest the following proposal be given serious consideration:

- Firstly, a fuller assessment of traffic use should be undertaken. Most of the traffic currently using the inner ring road of the City is local, not through-traffic. Therefore, the creation of new bypasses to the East and the West would have little impact on reducing congestion.
- Promote a District 'Outer Orbital' road system (A2/A299 to the west/north) and to the A2/A256 south/east and reinforce this with signage.
- Within the orbital route, the area should be made a Clean Air Zone subject to local traffic control.
- The current ring road and key parts of the A28 to be closed to traffic and given over to cyclists and pedestrians. It will be essential to cut off all possible 'rat runs', so that any route across the District is far slower than the orbital road system. We do not agree that the only mechanism for reducing traffic of the inner ring road is the building of new bypasses to the East and the West. Firstly, as stated, the bypasses would scarcely affect localised traffic, and secondly, through-traffic moving Ashford-Thanel and Thanet-Ashford could satisfactorily be directed to the Outer Orbital to the north and south of the District.
- Traffic coming into the areas Clean Air Zone to be controlled by emissions, weight (no trucks - only small/medium vans for deliveries etc.) and time (when can deliveries be made etc.)
- The above will also greatly benefit the villages along the A28 and free them from heavy traffic and pollution.

Conclusion

We hope that Canterbury City Council will further strengthen sustainable working partnerships with local organisations, business, Community Interest Companies, resident groups, parish councils, educational institutions, faith communities, and other local stakeholders. In this context, CCAP welcomes the engagement of both councillors and officers in its own meetings and deliberations and cooperation on proposed initiatives such as the 2021 Canterbury Climate Action Week. The District Climate Change Partnership Board, of which CCAP is pleased to be a member, is another welcome innovation designed to encourage district-wide planning to achieve Zero Carbon and should be complimented by similar council-stakeholder groups.

The 'Preferred Option' of the current Local Plan proposals, and Canterbury Focus B, do not in the view of CCAP reflect the objectives of the overall Strategic Objectives or of the Sustainability Appraisal. Nor do they correspond to the results of the Issues Consultation of 2020. In fact, the opposite: response after response calls for protection of greenfield sites, no more urban sprawl, priority to brown-field site development, tightened environmental standards for housing, retrofitting old housing, repurposing student accommodation for younger citizens, less traffic, better and cheaper public transport, encouragement of so-called 'modal shift' to cycling and walking (without the need for new roads and vast housing development), decarbonisation, protection of biodiversity and the countryside.

In the Policy Committee of 27 May 2021 the Chief Planning Officer stated unequivocally that the Local Plan consultation would be meaningful. We urge the City Council to honour that pledge.

Appendix A

Rationale for CCAP's rejection of the 'Preferred Option' and Canterbury Focus B

The Sustainability Appraisal Report sets out 14 key sustainability objectives against which the options can be appraised. However, when it comes to the actual appraisal of the options the process appears to fail on the following three counts:

1. Uncertainty (lack of data/assessment)
2. Missing information
3. Flawed weighting/assessment

Taking each of these points in turn and specifically applying them to the **Preferred Option (Canterbury Focus C)** these points are examined below.

1. Uncertainty

The 'Summary Appraisal of Strategic Growth Options' presented in the SA report provides the key information on how each option performs against the 14 established sustainability objectives.¹⁰ The table contains a large number of 'brown' cells, which represent multiple effects. Across the 14 established objectives **The Preferred Option (Canterbury Focus C)** has 9 question marks. In other words, there is uncertainty across more the 60% of the criteria. Furthermore, of the 'brown' cells the nature of the reporting masks the fact that for Climate Change, Biodiversity, Landscape and Land Use the cells contains 'red' data in the form of significant negative effects.

The Preferred Option has significant negative effects on 4 of the 14 criteria, is uncertain about 9 of the criteria, and claims significantly positive effects on 4 criteria (of which 2 are uncertain).

This is clearly indicated in the Summaries section of the SA report: *'However, there are also likely a mix of minor positive and significant negative effects on climate change (SA Objective 2), Biodiversity (SA Objective 3), Landscape (SA Objective 5) and Land Use (SA Objective 11). However, the extent and magnitude of such effects is uncertain at this stage.'*¹¹

This is also clearly indicated in The **Appraisal of Strategic Spatial Growth Options**, which shows significant negative effects of Options B & C (the options with additional housing and road infrastructure) in relation to greenhouse gas

¹⁰ 42680-WOOD-XX-XX-RP-OP-0003_S4_P01.3, p.8

¹¹ 42680-WOOD-XX-XX-RP-OP-0003_S4_P01.3, p.111

emissions,¹² biodiversity,¹³ water quality,¹⁴ sustainable land use and soil quality,¹⁵ resource consumption and waste.¹⁶

In comparison, **Canterbury Focus A** only has 1 identified significant negative effect, on Climate, which applies equally to all options, and still retains the significant positive effect on Housing, as well as recognising positive effects on Economy, Sustainable Transport and Health, again with uncertainty.

Please note also that document **Development Options Carbon Emissions** concludes that ‘Methods for constructing large infrastructure projects without generating carbon emissions do not exist currently. The scale of the projects must therefore be reduced to the minimum to achieve net emissions reduction benefits.’¹⁷

2. Missing Information

The SA report contains no mention of a new road, link road or even a bypass (as a noun). Instead, there are repeated mentions of ‘*Significant upgrading of A28 to enable through-traffic to bypass the city centre*’. There are no graphics or maps contained within the SA report depicting this significant upgrading of the A28.

Under no circumstances could a brand new link road be considered upgrade of an existing road.

This would indicate that the SA – a statutory requirement – is incomplete. A new road would require its own assessment even at Strategy stage.

This lack of clarity and absence of information is visible also in **Appendix E Appraisal of Strategic Spatial Growth Options**, which contains many mentions of ‘upgrades to the A28’, with not one mention of new link road.

However, the Forecast Report,¹⁸ central to the Movement & Transport vision, clearly indicates new bypass roads associated with Options 4 & 5 (which correspond to **Preferred Option (Canterbury Focus C)** and **Option B**). These new roads are certainly not upgrades to the A28. They also have significant impacts on multiple sustainability objectives.

¹² ‘An increase in greenhouse gases both during construction (e.g. due to emissions from HGV movements and plant and associated with embodied carbon in construction materials) and once development is complete (e.g. due to increased traffic generation and energy use in new dwellings) would be expected. The volume of greenhouse gas emissions associated with this option are primarily influenced by the quantum of development to be accommodated over the plan period. Growth at the levels proposed in all strategic options would lead to substantial embodied carbon in the construction phase although this quantum would be higher for the growth levels in this option with between 14,000-17,000 dwellings, employment and other associated development.’ (p.3)

¹³ ‘The residential growth associated with this option (14,000-17,000) would be expected to lead to the greater release of greenfield than lower housing growth figures. The magnitude of any negative effects in this regard will be dependent on the scale of greenfield land lost to development and the existing biodiversity value of sites.’ (p.5)

¹⁴ ‘Depending on the exact location of new development and its proximity to water bodies and the prevailing quality of the waterbody, and groundwaters, there is also potential for adverse effects on water quality associated with construction activities and from occupation of dwellings.’ (p.35)

¹⁵ ‘The delivery of 14,000-17,000 homes, substantial infrastructure, and employment development under this option is likely to result in adverse effects on landscape character and, potentially, the built environment.’ (p.34)

¹⁶ ‘Commensurate with the level of growth, it is expected that the development of around 14,000-17,000 homes under this option would lead to the greater use of raw materials during construction and the use of more materials and greater waste generation during occupancy than lower growth options. The potential for significant negative effects is therefore greater.’ (p.9)

¹⁷ CDLP2040-CC03, p.14.

¹⁸ CLP4 | 0.2

At the same time, the public questionnaire makes no mention of the additional Western Bypass. This is a poorly articulated scheme that has no detailed maps or designs, has been subject to no Sustainability Appraisal, and is only indicated by the rough graphic in the public-facing consultation pages.

In the Forecast Report, the infrastructure options are presented with different terminology, with Options 4 & 5 including the Western and Eastern bypasses.¹⁹ The document begins with the statement: ‘The results have shown varying levels of operational performance across all proposed LPR options, however there is no single stand out option that could be recommended for solving the existing local and strategic issues in the network.’²⁰

There are multiple projected data sets leading to rankings with no clear determination that Options 4 & 5 are preferable to Options 1-3. In the Summaries & Recommendations, there is no indication of any preference for the new bypass roads:

‘In conclusion, there are varying levels of operational performance across all proposed LPR options, however there is no single stand out option that could be recommended for solving the existing local and strategic issues in the network. It should be noted that based on the analysis presented in the previous sections, it has been identified that often, when one issue in the network is resolved by implementing one measure, it would consequently free up some suppressed traffic that in turn causes other problems elsewhere in the network. For example, restrictions around the City in the Option 5 reduces capacity for trips trying to go to the centre and improves the City Centre Ring road junctions, however this additional vehicular distance increases the expected journey time in the other area of Canterbury.’²¹

The Forecast Report makes very clear that efforts to ease city centre congestion will simply lead to congestion in other areas, especially on new roads if built.

3. Flawed Weighting/Assessment

The main arguments utilised to justify the increased significant negative effects identified for the **Preferred Option (Canterbury Focus C)** hinge on claimed benefits to Economy, Sustainable Transport and Health. However, the argument repeatedly used to promote the preferred option hinges on the scale of the development (14,000-17,000 homes) being able to unlock, through Section 106 agreements, finance to fund wider transport improvements. However, this is based on a number of assumptions not fully articulated in the SA report that raise serious concerns.

The SA report also recognises that the Preferred Option ‘would conversely also lead to the largest increase in new homes, and although the option would support sustainable transport measures, based on current assumptions, there would be an increase in private vehicle use.’²²

So we have a circular and flawed argument that the **Preferred Option (Canterbury Focus C)** will provide impetus (through Section 106) for investment in wider transports upgrades (new roads), whilst at the same time the significant increase in housing will trigger the requirement for these new roads, and will increase traffic numbers, which will further exacerbate congestion and air quality.

¹⁹ •Option 1: Existing Local Plan Strategy; • Option 2: Coast with improved public transport; • Option 3: City with SWECO interventions; •Option 4: City with SWECO interventions and relief roads; • Option 5: City with Ghent and relief roads. (CLP4 | 0.2 p.15)

²⁰ CLP4 | 0.2 p.6

²¹ CLP4 | 0.2 p.98 (emphasis added)

²² 42680-WOOD-XX-XX-RP-OP-0003_S4_P01.3, p.106

It must also be pointed out that Section 106 monies are unreliable sources of funding and are not guaranteed in the proposed national Planning Bill: ‘Planning for the Future.’²³

It is suggested in the SA that the **Preferred Option (Canterbury Focus C)** would be contingent on sustainable travel and modal shift. However, the reasons given is that the option ‘would support infrastructure delivery and investment that facilitates a significant modal shift.’²⁴ Once again we have the circular argument in which the only way to encourage the modal shift towards active travel is to build more houses that come with their own infrastructure. This is further qualified in the Forecast Report, in which Options 4 & 5 (equivalent Preferred Option) ranked first in Active Travel owing, simply, to their having the ‘highest number of housing.’²⁵

It is not explained why such measures could not also be incorporated into other options. Furthermore, due to the reduced number of houses the other options do not trigger the expensive and unsustainable plans to build new roads, contrary to the sustainability objectives, and reduces the comparative increase in absolute traffic numbers generated by the new houses.

Given the uncertainties identified in the SA, and the multiple significant negative effects identified for **Canterbury Focus C**, it is difficult to understand on what basis the SA can identify this option as the Preferred Option. The absence of information contained in the SA about the new roads required for **Canterbury Focus C** undermines the confidence in the assessment.

Given that other option, such as **Canterbury Focus A** and the **New Freestanding Settlement**, provide the necessary housing target, and similar positive effects, without the multiple significant negative effects, it seems illogical and inappropriate that it should be discounted in favour of the less sustainable option, particularly given the extensive uncertainties identified within the Sustainability Assessment.

We would also like to draw attention to the **Western Bypass**, for which there is no detailed map and, as with the Eastern Bypass, does not figure on the Sustainability Appraisal.

²³ ‘Planning for the Future argues that the current system of Section 106 agreements and Community Infrastructure Levy should be replaced by a nationally-set value-based flat rate charge (to be called the Infrastructure Levy), set at a single or varied rate.’ (Planning for the Future: planning policy changes in England in 2020 and future reforms) p. 26

²⁴ 42680-WOOD-XX-XX-RP-OP-0003_S4_P01.3, p. 111

²⁵ CLP3 p.91

The Forecast Report: **Transport Modelling Report (May 2021)** is the only document to show any maps (the highest-resolution image copied here from p.24).



What the maps show is that the proposed route a) runs parallel to the existing Rough Common Road, b) cuts through a river valley, woodland, farmland, hedgerows, an orchard, and (so it would appear) right through the grounds of Kent College. Furthermore, it deposits traffic opposite the notoriously busy Giles Lane junction. The various traffic-flow models do not show any improvements, as the traffic ends up with the same pressures as currently on Whitstable Road and Giles Lane, with nowhere to go but along Giles Lane through the University campus heart, which conflicts with the University Master Plan vision to reduce campus heart traffic, and out to Tyler Hill. There is no visible benefit in terms of traffic, whilst the damage to the environment is tremendous.

This again clearly demonstrates that the ‘preferred option’ of building the Eastern and Western bypasses are not borne out conclusively by the Forecast Report.

There is a duty under the NPPF to promote Sustainable Development. Furthermore, the Council has adopted net zero pledges and policies. The SA report sets out the key 14 sustainability objectives against which to test the options. The **Preferred Option (Canterbury Focus C)** explicitly fails against several objectives, namely: Climate Change (SA Objective 2), Biodiversity (SA Objective 3), Landscape (SA Objective 5), Land Use (SA Objective 11).²⁶

It is our view that the SA has insufficiently considered the impacts of the new roads associated with **Preferred Option (Canterbury Focus C)** and is misleading in the consultation regarding the proposed upgrading of the A28, when other plans show new roads, which cannot be accurately described as upgrades to the A28.

Summary of our rejection of the Preferred Option and Canterbury Focus B:

- The proposed Eastern and the Western bypasses have not been considered in the Sustainability Appraisal.
- A significant proportion would be built on greenfield sites surrounding the city and towards the coast, especially surrounding the Blean Woods National Nature Reserve, West Blean and Thornden Woods.
- Prime agricultural land, woodland, scrubland and varied green spaces would be lost. This is a concern across Kent at present, especially locally in Faversham, Sittingbourne, Dover and Thanet.
- Loss of woodland and scrubland threatens biodiversity by removing habitat, refugia and green corridors. It also removes valuable carbon store.
- Regardless of the energy and emissions standards of the new build, the process of construction is immensely carbon-costly (acknowledged in LP supporting docs).

²⁶ 42680-WOOD-XX-XX-RP-OP-0003_S4_P01.3, p. 107

- The loss of green amenity removes the access to nature that, since Covid, we are increasingly reliant upon.
- Regardless of cycle lanes and footpaths, the distance from town of many of the satellite sites would bring huge volume of extra traffic in and around the city, and overburden rural roads and lanes.
- The demands upon water from the river catchments, aquifer and reservoirs would be huge, imperilling an already over-burdened system.
- The waste water would imperil an already over-burdened sewerage system; the delays of the development at Mountfield Park have been due to the risk on Stodmarsh National Nature Reserve, a RAMSAR Special Protection Area and SSSI.
- The draft Local Plan highlights Heritage as central to the vision. 14-17,000 new homes would destroy much of this heritage, especially in the rural areas and villages.
- The virtual doubling of Canterbury’s population would effectively imply a doubling of potential car ownership and traffic flow and make the stated purpose of the ring road totally inadequate to meet the envisaged traffic flows. Any benefit would therefore be lost.

The SA states to be a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised. Furthermore, the SA also incorporates a process set out under the UK regulations called the Strategic Environmental Assessment (SEA), which requires that alternative options are considered.²⁷ The SA report does identify alternative options which are more sustainable, such as **Canterbury Focus A** and the **New Freestanding Settlement**.

Therefore, it is our considered response that the current **Preferred Option (Canterbury Focus C)** cannot be considered sustainable under the NPPF, and is not appropriate for the future of the Canterbury District.

Appendix B

Overview of Transport and Planning developments nationally

Transport:

The Government’s analysis of **September 2019** ‘Road transport and air emissions’ highlights the contribution of road transport to greenhouse gas and air pollutant emissions.²⁸

In **December 2020**, as part of the oral evidence of the Biodiversity and Ecosystems Environmental Audit Committee Sir Robert Goodwill posed the question to Sir Partha Dasgupta: ‘how compatible is the roadbuilding programme with our goals in terms of nature recovery?’ Dasgupta’s response highlighted the negative impacts of roads to biodiversity and ecosystems: ‘Fragmentation is one of the fastest ways of reducing biodiversity, destroying biodiversity, and there is a very good ecological reason for it. Ecological processes are non-linear, therefore if you halve an ecosystem then some of the productivities of the two halves will be smaller typically than the original productivity. That is where things go wrong. One reason is that, of course, the migration possibilities of organisms are reduced when you create this.’²⁹

²⁷ Statutory Instrument 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004. Available from http://www.legislation.gov.uk/uksi/2004/1633/pdfs/uksi_20041633_en.pdf.

²⁸ <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairmissions/2019-09-16>

²⁹ <https://committees.parliament.uk/oralevidence/1391/html/>

In **February 2021**, the parliamentary Environmental Audit Committee called for climate and nature investment to be prioritised in the economic recovery. ‘Considerable progress has been made in moving to clean electricity generation in the last decade, but the UK is lagging in introducing measures to decarbonise transport, industry and buildings. In common with many other nations, by the end of 2020 the UK had signally failed to meet most of the Aichi targets to protect wildlife, habitats and eco-systems. Many of the green initiatives the Government has introduced as part of its economic recovery packages are welcome, but do not go far enough.’³⁰

It must be stressed that despite the moves to ‘modal shift’ outlined in the Local Plan Preferred Option, and even with improved emissions standards and carbon reviews, the vast housing and road developments are not compatible with this urgent call to decarbonise transport and buildings.

If the environmental costs were not sufficient to dissuade Canterbury City Council from building the new bypasses, then the financial costs must be more closely considered. Estimates for the Eastern Bypass vary. No estimates at all have been provided for the Western Bypass. These costs will undoubtedly rise. In **May 2021** it was reported that a similar link-road bypass project proposed in Norwich – the Wensum Link – has now spiralled to just under £200m at £50.8m a mile.³¹ This project has also divided the Norwich City Council and Norfolk County Council and has become a national controversial issue that associates Norwich with similar contested road building schemes across the country.

In **June 2021** the Climate Change Committee published its ‘2021 Progress Report to Parliament’,³² which urges the Government to review its road-building strategies. To secure the 63% cut in emissions needed between 2019 and 2035 (78% cut since 1990), the CCC is calling on the Government to ‘prioritise funding away from car use’ and ‘to encourage behaviours that reduce travel demand such as working from home or using technology in place of business trips. Prioritisation of investment in improved digital connectivity rather than road-building would help achieve this, contributing towards a greener recovery.’³³

The CCC report also states that ‘Decisions on road building, planning, fossil fuel production and expansion of waste incineration are not only potentially incompatible with the overall need to reduce emissions but also send mixed messages and could undermine public buy-in to the Net Zero transition.’³⁴ This is extremely important, and echoes our concern of Canterbury City Council’s mixed messages regarding decarbonisation and road-building.

In **June 2021** the House of Commons Committee, Environmental Audit Committee published ‘Biodiversity in the UK: Bloom or Bust?’ in which they outline the tremendous negative impact of road-building on biodiversity. ‘The Government has committed to spending £27.4 billion between 2020 and 2025 in England’s “largest-ever” road-building programme. Environmental organisations have raised concerns that the road building programme is incompatible with the Government’s goals on nature recovery. They argue that new roads will further accelerate the loss of biodiversity by severing and further fragmenting habitats. The extra traffic generated by roads will further stimulate more car-dependent housing and out of town retail parks and business parks.’³⁵

In **June 2021** The Welsh government declared a freeze on all new road-building projects as part of its plans to tackle the climate emergency. The deputy minister for climate change, Lee Waters, explained: ‘We need a shift away from

³⁰ <https://publications.parliament.uk/pa/cm5801/cmselect/cmenvaud/347/34703.htm>

³¹ <https://www.edp24.co.uk/news/cost-of-ndr-western-link-up-by-45m-8008792>

³² <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/>

³³ <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/> p.164

³⁴ <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/> p.157

³⁵ <https://publications.parliament.uk/pa/cm5802/cmselect/cmenvaud/136/136-report.html>, p. 102

spending money on projects that encourage more people to drive, and spend more money on maintaining our roads and investing in real alternatives that give people a meaningful choice.’³⁶

In **June 2021** the case raised by the Transport Action Network against the Government’s road-building strategy was heard in the High Court. The case highlighted the fact that the Government’s road strategy was written in 2014, before the UK’s legal commitment to net-zero, before its latest carbon budget, and before the significant changes to travel due to Covid. In **July 2021** the TAN won the first hearing of the case. At the time of writing, the case has not concluded, but it indicates clearly a widespread public disquiet with the plans across the country to build new roads. The extent of the public concern is illustrated in the Community Planning Alliance, which documents 482 grassroots campaign groups fighting housing developments, roads and environmentally damaging projects.³⁷

In **June 2021** the Conservative defeat in the Chesham and Amersham by-election was accredited in many news reports both to the destruction of land due to HS2 but also to local planning issues and the likely impact of the proposed Planning Reform.

In **July 2021**, a government decision to approve a major roadworks project in Derby has been quashed by the High Court.³⁸

In **July 2021** the Government released for consultation the Transport Decarbonisation Plan, which includes ambitions to amend the ‘road transport infrastructure policy to require that they take account of (1) the UK’s commitments under the Paris Agreement, and (2) the commitment to net-zero carbon emissions by 2050.’³⁹

Lastly, and importantly, The Jacobs Forecast Report of **May 2021** stresses the need to consider all the projections for the Local Plan in light of behavioural changes through Covid: ‘It is recommended for future considerations to perform sensitivity test incorporating the “Work from Home behaviour” using the preferred option. Suggested sensitivity modelling approach: • Reduction by around 30% car trips from new B1 office related developments (factor based on Kent or Canterbury local data); and • Monitor overall car trip reduction for “Commuting trips”. Based on DfT data is expected about 10%-13% car trip reduction roughly (local data to be used if available).’⁴⁰ These shifting baselines do not seem to be reflected in the Preferred Option plans for major road infrastructure.

Planning:

Whilst we recognise the obligation of the City Council to provide a Local Plan in line with national guidelines, current trends in national policies must be taken more into consideration at this strategy and consultation stage.

Canterbury City Council must question the ONS data that have formed the basis of the Canterbury Housing Needs Assessment (HNA). In **May 2021** The Office for Statistics Regulations published a ‘Review of population estimates and projections produced by the Office for National Statistics.’ Amongst other recommendations, the OSR indicated that: ‘• ONS needs to investigate the root and scale of the issue associated with cities with large student populations and communicate its findings publicly, to support the appropriate use of the existing data. • ONS needs to integrate a more flexible and responsive approach to methodological changes in its design for admin-based population estimates, working with its external partners, so that improvements are more timely. • ONS should collaborate

³⁶ <https://www.theguardian.com/uk-news/2021/jun/22/welsh-government-to-suspend-all-future-road-building-plans>

³⁷ <https://www.google.com/maps/d/u/0/viewer?ll=53.40330100106092%2C-0.36594839919916744&z=7&mid=13yu348GgZojatUt3lc5FG6krn3MhcNyD>

³⁸ <https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/a38-derby-junctions/?ipcsection=overview>

³⁹ <https://researchbriefings.files.parliament.uk/documents/CDP-2021-0088/CDP-2021-0088.pdf>, p. 11

⁴⁰ CLP4 | 0.2 p.102

with others to incorporate local insight and carry out sensitivity analysis to enhance its approach to quality assurance.’

In **May 2021** The Housing, Communities and Local Government Committee published ‘The future of the planning system in England’ in which, amongst numerous recommendations to embed sustainability more robustly within planning policy, it is recommended that ‘The Government should publish the evidential basis for its 300,000 housing units a year target and set out how this target will be achieved, both by tenure and by location.’⁴¹

Rosie Pearson, Co-Founder at Community Planning Alliance, summarises this need for statistics review: ‘It is time to review the national housing target and to ensure it is based on robust evidence. Until then, England’s green and pleasant land will continue to be allocated for housing that is not even needed.’⁴²

Neither can the argument of housing shortage nationally be viably employed as a rationale for new house-building developments. In in **August 2019** report by UK Collaborative Centre for Housing Evidence: ‘Tackling the UK Housing Crisis: is supply the answer.’ The author, Ian Mulheirn calculates that for the past 15 years English councils have been working to annual targets of up to 80,000 more homes than there were households to fill them.

This is reflected also in a **September 2019** report ‘Houses are assets not goods: taking the theory to the UK data’ by Bank of England researchers John Lewis and Fergus Cumming, in which they argue that ‘Increasing scarcity of housing, evidenced by real rental prices and their expected growth, has played a negligible role at the national level.’⁴³ The authors also argue that building new houses will not lower house prices or increase affordability.

In the absence of this evidence for housing number predictions, the data employed in the HNA, which figures so prominently in the Canterbury Local Plan, must be reviewed.⁴⁴

The City Council should also factor into its calculations for new housing the latest figures on empty homes. According to Action on Empty Homes, there are currently 2144 empty occupancies in Canterbury.

In summary, it is vitally important that Canterbury City Council take these issues into consideration. It would be disastrous to embark on massive housing and road-building developments if the essential data used as rationale were modified in light of these investigations and reports.

William Rowlandson, Deputy Chair CCAP – July 2021

⁴¹ <https://committees.parliament.uk/work/634/the-future-of-the-planning-system-in-england/>

⁴² ‘Houses for people who don’t exist’: <https://www.linkedin.com/pulse/houses-people-who-dont-exist-rosie-pearson>

⁴³ <https://bankunderground.co.uk/2019/09/06/houses-are-assets-not-goods-taking-the-theory-to-the-uk-data/#more-5400>

⁴⁴ <https://www.actiononemptyhomes.org/Handlers/Download.ashx?IDMF=cc105ded-c15e-4f6a-aac1-eee6b77e4ae7>