

# **ALLIANCE OF CANTERBURY RESIDENTS' ASSOCIATIONS**

## **RESPONSE TO CCC LOCAL PLAN DRAFT VISION AND OPTIONS CONSULTATION AUGUST 2021**

### **INTRODUCTION**

ACRA readily acknowledges the progress made by Canterbury City Council in working towards the 2030 zero carbon target for its own activities.

However the need to extend these initiatives into the community becomes increasingly urgent with every passing year and that is why we believe that, as an overriding aim, all of the options put forward in this consultation must be robustly analysed against the twin objectives of environmental sustainability and carbon neutrality for the district as a whole at the earliest possible date.

It is for this reason that we completely reject the Preferred Growth Option and Canterbury focus B option.

The suggestion that the best way of improving our natural environment and conserving our rich and unique heritage is to build double the number of housing units specified in the central government forecast of need is in our view completely undeliverable and financially risky in the extreme.

### **STRATEGIC CONTEXT**

We were surprised and disappointed that there was no East Kent strategic context in the document, and would suggest that without a clear understanding of where and how any of the proposals in the document would integrate with housing and infrastructure developments in adjoining District Councils, an objective, measured and costed evaluation of the options is just not possible.

We also note that, at the time of writing, the deadline has not arrived for the ONS to respond to the request from its regulator to re-examine its calculations of housing needs in areas with high student numbers relative to the local population. We await the findings of this investigation with great interest and look forward to the CCC response after they become available

### **ENVIRONMENT**

In contrast to the order set out in the consultation questionnaire and the Policy Committee papers, we make no apology for putting environmental considerations at the top of our list of priorities. This needs to be the point from which we start all debates about our way forward.

Colleagues of ours in other groups such as the Canterbury Climate Action Partnership and the Canterbury SDG Forum (which we fully support) are presenting to you very powerful evidence-backed expert submissions about their specific areas of interest such as climate change, sustainable living, biodiversity, fresh water supplies, foul water and pollutant discharge into the sea and our rivers and lakes, and flood risk from our rivers and as a consequence of rising sea levels.

On Issue HNC8, 'How can we deliver low carbon and energy efficient housing?' we support

HNC8C (Preferred Option): All new homes delivered to net zero

and

HNC8F (Preferred Option): Set higher local domestic build energy standards for modifications to existing homes and require the submission of an energy plan to assess the potential for improvements to the energy performance of the overall building.

On Issue NE3, 'How should we protect and enhance biodiversity and green and blue infrastructure?' we support

NE3C (Preferred Option): Require new developments to enhance existing or provide new green infrastructure, to conserve and where possible enhance blue infrastructure, and seek 20% biodiversity net gain.

We have noted with great concern the coverage in the national press, of late, regarding the apparent ease with which developers are alleged to have easily manipulated biodiversity targets to their own advantage. Of the two examples given, one was within Dover district. We trust that NE3C will be not only included in the Local Plan but rigorously enforced.

On Issue HNC3 'How should we provide opportunities for suitable brownfield and regeneration developments?' we support

HNC3B (Preferred Option): Maximise opportunities for delivery of suitable brownfield and regeneration developments.

We urge CCC to make every effort to concentrate the additional housing we do need on brownfield sites.

On Issue HNC6 'How can we support sustainable living in new communities?' we support

HNC6C (Preferred Option): Set clear requirements for new or improved social and community infrastructure to be delivered as part of strategic developments and require large developments to demonstrate that essential services can be accessed within 15 minutes walking/cycling time.

We urge CCC to work towards the delivery of 15-minute communities in which, for the first time on record, artistic impressions of development become the reality and go a long way to secure the form of sustainable living we all wish for.

We reiterate that to proceed with building an excessive number of houses in the face of such unprecedented environmental challenges, as envisaged in the Preferred Growth Option, is in our view an act of supreme folly which exposes residents to serious unnecessary risk to their health and general well being.

## **TRANSPORT**

No evidence has been presented to suggest that the serious problems of traffic congestion and the consequential high levels of PM 2.5 and N20 in Canterbury city centre will be best relieved by the construction of seriously environmentally damaging eastern and western by passes. We note the conclusion of the Jacobs Transport Modelling Report (at 11.1):

"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.... The assessment of a 'best' or 'better performing' option is therefore complex, and dependent on what the priority is for the scheme."

No evidence-based case has therefore been made for the Preferred Growth Option as the best solution to traffic problems.

Electric vehicles, while clearly preferable to those driven by diesel/petrol, will only have a marginal impact on air pollution because of the dangerous-to-health dust and particles generated by brake use and tyre degradation. Neither will they alter congestion levels.

What is needed is a net reduction in private vehicle use which extends beyond the family car to include vans and lorries. The latter can be achieved through innovative development of freight reception areas on the periphery of the city with single vehicle distribution within the wider city area.

The former is achieved not just by providing better facilities for pedestrians, cyclists and scooter riders, but the provision of an integrated public transport service with guaranteed coverage of all areas between 6 am and 11pm. People will make far more use of buses and trains if the service timetables are integrated.

Use of the local rail network both for freight and passengers is currently far from optimal. When identifying sites for new housing and commercial activities, high priority should be given to the ease of access to train services. This may necessitate the construction of new stations.

In order to focus minds and stimulate meaningful progress in reducing road traffic and encouraging new mobility modes, CCC is requested to give serious urgent consideration to the designation of Canterbury city centre as a Clean Air Zone (CAZ) and to learn from the experiences of cities such as Bath and Bristol which are at the cutting edge of tackling these problems meaningfully.

## **HERITAGE**

ACRA is delighted that the important contribution that our heritage can offer within the longer term economic regeneration of the city and the wider area is now formally recognised. Such acknowledgment is long overdue and the decision by UNESCO to remove Liverpool from the list of World Heritage Sites is a timely reminder of the risks of neglecting their sensitive conservation. Sadly this has been the case in Canterbury in recent years.

We therefore suggest that, on Issue NE1, 'How can we protect and enhance our heritage assets?', the Preferred Option

Option NE1A: Continue with the current Local Plan approach

is inadequate.

The Local WHS Management Plan has remained unchanged since 2002 despite a requirement for it to be updated every five years.

Conservation of the three World Heritage Sites that we are fortunate to have in our midst has a far wider requirement than mere good internal housekeeping. It covers the external physical and natural environment over a far wider area than the two square miles in which they are located. In recent years Canterbury city centre has witnessed a plethora of overlarge, in some cases unacceptably brutal, buildings which have incrementally whittled away at the prominent place which the Cathedral and our many other historically interesting buildings should have here.

The latest example of a failure of duty of care has been the installation of ventilation units atop a new university building adjacent to St Augustine's Abbey. This observation applies equally to large developments that are proposed for the outskirts of the city such as Mountfield Park, where its impact on the World Heritage Sites has been completely disregarded.

Heritage is always at the bottom of the pecking order when planning applications are considered and this lack of appreciation of its importance needs to be remedied urgently. The importance of the history of Canterbury has played a major part in attracting visitors here but in recent years cities such as York and Bath now offer a far better overall visitor experience. Canterbury has fallen badly behind, to such an extent that a casual passing traveller would be completely unaware that we have three sites here of worldwide significance.

## **EMPLOYMENT AND HOUSING**

It is vital to ensure as a matter of urgency that employment opportunities here are diversified to avoid over-reliance on the academic sector, which faces an uncertain future locally with the progression of on-line learning.

ACRA is very supportive of efforts to support small technology-driven business set-ups and creative ideas for the reuse of former retail space such as leisure and niche services

It is vital that there is a clear correlation between local employment opportunities, affordable housing for young families, and social housing for all ages. There is little discernible value to the local economy in providing housing for long distance commuters. Not only is long (over 25 miles) distance daily commuting environmentally damaging (presuming that in the absence of radically improved bus and train services most of it will be by private motor car), it is socially disruptive and mentally stressful .

## **SOCIAL, HEALTH AND ENVIRONMENTAL COMMUNITY INFRASTRUCTURE**

Following on from the preceding paragraph, it is essential that as well as areas of new housing development having the requisite infrastructure in place, sight is not lost of the important need to ensure equality of access to these facilities across the area as a whole.

Location of GP services and provision of open space, for example, is very patchy, with some parts of the district being very well served whilst residents in other areas have to travel some distance for the facilities and services they need. For example, in the entire area of South Canterbury as defined by the Old and New Dover Roads, there is no defined open public space for local residents to enjoy.

It is vital that CCC continue with and give serious consideration to the conclusions of Equality of Access Impact Statements and act in accordance with those findings.

ACRA is very supportive of the need to make proper provision for the needs of the travelling community, with the caveat that once this is done, any subsequent applications beyond the approved allocation of spaces are firmly rejected.

## **DELIVERABILITY**

ACRA acknowledges that at this vision stage of the Local Plan, precise costs will not be available, but even allowing for an acceptable degree of uncertainty, we concluded that there was insufficient detail to allow proper evaluation of the options and, more worryingly, the supporting information that was provided was disproportionately divided across the options.

We believe that a strategy based on an over-expansion of concrete and tarmac is intellectually outdated, highly damaging to the environment, disappointingly unimaginative, and financially risky to the point of folly. It would appear that these proposals have been fabricated purely as a means of raising money from S106 contributions. Given the track record of developers in successfully wriggling out of such obligations, this does not inspire confidence. Indeed there can be no certainty that even five years from now the S106 mechanism will remain in place.

One important point to register here is the great alarm generated within the community by the vague line of blobs purporting to be the line of a possible eastern bypass. Not only is this general line environmentally challenging, its imprecision needs urgent clarification.

## **CONCLUSION**

ACRA recognises the difficult choices for CCC that lie ahead.

It is appreciative of the open approach that CCC has taken so far with the Local Plan consultation process to date. CCC can be assured that if invited to continue with the engagement of community groups such as ours, we will strive to ensure that our contributions are empathetic and constructive.

Whilst this submission reflects the general consensus view of the ACRA committee, we are encouraging our member organisations and individual members to make their own submissions and we would ask that they are given due consideration.

ACRA has been in touch with Canterbury Climate Action Partnership, Canterbury Alliance for Sustainable Transport, Canterbury SDG Forum, and the Canterbury Society during this consultation and we are supportive of the submissions from those bodies.

Stefan Colley  
Chair ACRA