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To: Planning Management
Canterbury City Council
Military Road
Canterbury CT1 1YW

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Dear Planning Management department,

COMMENTS ON THE CANTERBURY DISTRICT LOCAL PLAN

We submit the following comments on the latest draft of the Canterbury District Local Plan (CDLP). We are primarily concerned with the environmental impact of the plan, but also offer some comments on other aspects of the CDLP.

Environmental impact of the plan

From our reading the draft's approach to sustainability is based primarily on economic sustainability. We urge that the draft be reoriented so that the overriding framework is pivoted towards environmental sustainability. We agree that

Businesses based in the villages improve the sustainability of our rural settlements as they provide employment opportunities for rural residents, reducing their need to travel longer distances for work. Given the congestion and air quality issues around the district's urban areas, and the changes in working patterns emerging from the global health emergency, the new Local Plan will need to support the development of employment opportunities within the rural areas, where this can be accommodated.

However, for the CDLP to be firmly based in the principles of environmental sustainability there needs to be a clear and unambiguous commitment that economic development will be permitted only to the extent that it does not significantly degrade the natural environment or any areas of outstanding natural beauty (AONB). Such a commitment should be fundamental to the proposed Sustainability Appraisal. This is an important document that should be subject to separate stakeholder consultation and validation.

For example, a commitment to environmental conservation and sustainability and protecting AONBs is missing from the following passage:

Support the sustainable growth of our rural communities with affordable housing, community facilities and transport, and take advantage of opportunities to grow the rural economy

Similarly, the natural environment is completely absent from the following passage which uses the phrase 'sustainable rural areas' without definition or context:

Growth focused in sustainable rural areas, with some growth at villages and hamlets, and more limited growth at Canterbury, Whitstable and Herne Bay.

We welcome the emphasis on improved public transport to connect rural and urban areas but seek two additional pledges. First, there should be a commitment to reducing the greenhouse emissions from public transport with a view to driving these down to zero by 2030. Second, we seek a stronger emphasis on significantly increasing the mileage of cycle paths.

There is well-founded concern regarding the absence of cycle paths in plans for the proposed Mountfield development. The active encouragement of cycling demonstrates a commitment to reducing – or at least slowing the growth of - motorised transport in the district. It would also demonstrate a commitment to decarbonisation of the local economy, something that could also be demonstrated with strong commitments in the CDLP to:

- Developing an infrastructure for electric car recharging points
- Reduction of 'farm to fork' foodmiles through support for local farmers' markets
- Reducing nitrous oxide and particulate matter air pollution, something that is especially important given that Canterbury has previously broken national air pollution guidelines on several occasions. It is well established in the medical literature that the detrimental health effects of air pollution include increased risks of strokes, heart disease and respiratory problems.
- Ensuring that any new build in the district is carbon neutral (the existing plan merely mentions 'low carbon', a weaker commitment than 'carbon neutral')
- Retrofitting of existing building stock (housing, office, retail, leisure etc) in order to reduce carbon dioxide emissions for light and heating

We welcome the commitment to maintaining green gaps around Canterbury. We agree that "Gradual merging can not only harm the character of the open countryside but also negatively impact the setting and special character of villages and coastal towns". With respect to the commitment in the draft that "Green gaps are another local designation which aim to keep the separate identities of certain villages and towns within the district by preventing built up areas from merging together" we recommend a stronger commitment, namely that green gaps should be considered as foundational in their strategic significance for the CDLP and neighbourhood plans. We seek a commitment that the designations will be stated to endure beyond the end of the plan period and that, where appropriate, the gaps are also designated as Local Green Space. For example, a change to local parish council boundaries should not constitute a legitimating rationale for changing the boundary of green gaps, which should continue to serve as permanent buffers.

The commitment to green gaps and other green spaces is absolutely essential for providing ecological space that will reduce the risks to biological diversity through habitat erosion and agrochemical pollution, and protecting intrinsic landscape characteristics, recreational value, local character and wildlife.

We have carried out some research on the standing of green gaps within the Canterbury district as shown in publicly available maps. The following link to the 2017 map clearly shows green gaps, as well as conservation areas, AONBs and areas of high landscape value: https://mapping.canterbury.gov.uk/webapps/Local_Plan_Proposals_2017/

This map appears to be linked to the 2031 version of the CDLP:

https://mapping.canterbury.gov.uk/webapps/Planning_information/

Curiously the legend on this map, as well as the map itself, no longer shows the category 'green gap' nor areas of high landscape value. Presumably this is for cartographic or technical reasons concerning the design of the map rather than any change in policy on the importance of green gaps in the CDLP. We would welcome clarification on this important point.

We note the proposal for "Growth focused at a new freestanding settlement, with more limited growth in Canterbury, Whitstable and Herne Bay and rural areas". We have two queries on this. First, where will this proposed freestanding settlement be located. Second, are we right to presume that this proposal will respect existing green gap commitments?

We note this commitment:

Support the growth and development of our universities as a centre of innovation and learning excellence, which will help create business start-ups and skilled jobs

We urge that this be amended to emphasise the role that universities and businesses can play in stimulating a post-pandemic green economic transition, with the emphasis on the start-up of businesses firmly committed to a zero-carbon economy and the creation of green jobs.

Similarly, the following commitment should be amended to emphasise green infrastructure (rather than just 'infrastructure') and sustainable economic development that respects nature (rather than just 'development'):

Exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses, and ensure the critical infrastructure is delivered at the right time to support development

We urge that CDLP references to climate change contain a commitment to at a minimum match, if not exceed, the UK's international greenhouse gas reduction commitments under the UN Framework Convention on Climate Change (UNFCCC). Please include a strong commitment to the UNFCCC process in the next draft of the CDLP.

With respect to this pledge:

Strategic housing growth would be well connected through expansion of the city, and new communities would be supported by community infrastructure like schools and shops, plus open spaces.

This is concerning as it presumes an expansion of the city as a given. Any expansion of the city, and any 'housing growth', should only take place after rigorous environmental impact

assessments (EIAs) that demonstrate that growth and expansion will not degrade the natural environment (for example, through depletion of biological diversity or contamination of ground water).

There are similar concerns for the following:

To support this, there will be an extra 14,000 to 17,000 homes by 2040 and an upgrade to the A28 road, as well as significantly improved public spaces and less car use.

What is the evidence base for these numbers? The commitment to upgrading the A28 presumes increased traffic, which is incompatible with the environmental imperative to reduce greenhouse gas emissions and air pollution.

Regarding the following:

Residential redevelopment in centres normally uses brownfield land. These sites are often suitable for different housing types and tenures for different groups including older people.

We urge that the default position of the CDLP should be that new build housing will take place on brownfield sites, with greenfield developments adopted only very reluctantly and only after a rigorous EIA. We note this sentence:

- The level of housing need identified by the government's calculations means that new greenfield sites, including some large strategic sites, will be needed to meet identified needs.

Where are the government's calculations? Has CCC checked them? We urge that any policy to build on greenfield sites 'including large strategic sites' (whatever this might mean) be rejected and that this phrase be struck from the final draft.

We refer to the following gov.uk site:

[11. Making effective use of land - National Planning Policy Framework - Guidance - GOV.UK \(www.gov.uk\)](#) National planning policy para 120 mandates local authorities to

(c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

(d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).

This is all relevant to the CDLP, especially post-Covid. Has CCC's brownfield land register been updated since the start of the pandemic?

We are puzzled by this assertion:

- There is a specific need for a conference hotel.

Where is the evidence base for this 'specific need'? it can be argued that since the start of the pandemic face-to-face conferencing is no longer so popular, with increased uptake of online and blended conference formats.

Other points

We wish to draw your attention to four other matters:

1. The new local plan will be introduced in the context of new national planning legislation. How can the CDLP be future proofed against future changes of government policy, especially those that may erode the cultural distinctiveness of Canterbury and its surrounding natural environment?
2. The CDLP mentions government targets, yet has not produced evidence of these. For example, from where does this come from: "Minimum development of 9,000 homes to meet government targets"? How was this figure calculated?
3. Concerns have been expressed regarding perceived inaccuracies of population estimates on which household projections and subsequent housing need are based [Review of population estimates and projections produced by the Office for National Statistics – Office for Statistics Regulation \(statisticsauthority.gov.uk\)](#). To what extent is the CDLP consistent with the most recent and most accurate population estimates? The OSR report specifically mentions the implications associated with cities with large student populations. The impact of the OSR report should therefore be integrated into the local plan deliberations. The ONS is due to report back to OSR this year with plans to address the identified problems.
4. An important consideration is the role of universities. University master plans will be incorporated into the CDLP, but what prior scrutiny will take place of the university master plans, and their commitment to the broader aims and objectives of the CDLP, such as protecting Canterbury's world heritage sites? (Overall the draft shows a poor lack of referencing to Canterbury world heritage status.) There has been a significant increase in university buildings in Canterbury in recent years, especially of Christ Church University. To what extent are these buildings constructed to ensure compliance with the UK's commitments to reducing greenhouse gas emissions?

We respectfully submit these comments, queries and observations in the hope that they will assist CCC in preparing the next draft of the CDLP. We are happy to engage in further correspondence and dialogue with as you work to prepare a plan that will fit the needs of Canterbury's current and future population. We wish you well in your work. We are,

Yours sincerely



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[e-signature not available]

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David Humphreys

