

# Canterbury Local Plan, 2040

## Spokes response to consultation, August 2021

Spokes, the east Kent Cycling Campaign, is a membership organisation which campaigns for cycling to be a major part of a sustainable transport policy for east Kent and for the benefits of cycling to be easily accessible to people and organisations in the area.

This document is our response to the consultation by Canterbury City Council (CCC) to its proposals for the *District Local Plan to 2040*. We have concentrated generally on the plan's sections on vision, strategy and transport and movement.

### **Draft vision for the district**

We support the Council's draft vision, ie:

- creating a strong and resilient economy
- centring growth on Canterbury
- building healthy communities
- improved connectivity.

In particular we support strongly the elements of the vision relating to transport, namely,

*Investment in ... walking and cycling routes will have helped to improve air quality and the challenges of climate change, supporting good health and wellbeing in our communities*

and

*Existing communities will be enhanced, and new healthy communities will be of high quality, low carbon design; with good public transport to the city and beyond.*

### **Draft strategic objectives**

Spokes also supports the Council's draft strategic objectives, especially the following:

- *Create a transport network with a focus on low carbon travel to improve air quality and people's health, while making sure there's excellent access to city and town centres on foot, cycle and by public transport, including intelligent transport systems*
- *Take advantage of, and improve, our links to and from London and the continent, while creating a local transport network which means most residents can access their day-to-day needs within 15 minutes through healthy, environmentally friendly journeys*

- *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*
- *Adapt to and reduce the impacts of climate change by making sure new development is highly energy efficient and encourages low carbon lifestyles*

## **Growth options**

We do not support or agree with the following growth options:

- The Council's preferred option (Canterbury focus C)
- Canterbury focus B
- Coastal focus
- Rural focus
- New freestanding settlement

With some reservations and concerns, we support Canterbury focus A - providing substantial enhancements to active travel and decarbonising the transport network are added - as the basis for the local plan.

### **The seventh option**

Having said that, we believe CCC should have created an additional option that would achieve the plan's vision and strategic objectives by prioritising active travel and adopting policies to achieve a significant modal shift towards walking, cycling and public transport while keeping new housing developments to that mandated by the government - 9000 homes - and no more.

### **Canterbury focus C - preferred option**

The argument behind CCC's preferred option seems to be that if more houses are built, there'll be more money to spend, this money can be spent on new roads, specifically the east and west bypasses, which will reduce traffic in Canterbury thereby allowing investment in cycling, walking and public transport, which, overall, will produce the most sustainable outcomes.

We disagree with this approach. Our reasons for this are set out in the following sections.

#### *1. Dependencies*

Although this is a plan there are no intrinsic dependencies between the plan's components; each is technically independent of the others. 17000 homes could be provided, for example, and all the money from these spent on active travel. Even if this option were adopted it would seem more sensible, practical and carry less risk to introduce the active travel elements first as these are cheaper and can be implemented more quickly.

## 2. Finance

Unless some strange threshold effect applies, building 9000 houses instead of 17000 will still provide 53% of the funds from the higher target. If the money from providing 17000 homes will pay for bypasses and additional roads such as the Chestfield link and active travel options in Canterbury, then surely 53% of this should be sufficient to secure all of the environmental benefits from focus C without the road building.

It would have been useful if CCC had published any financial modelling it has carried out in developing the growth options. If it has, please send us a copy or let us know where we can find it.

As an aside, we note that Quinn Estates are prepared to pay about £150 million towards a new hospital in Canterbury if it gains planning permission for 2000 homes, ie £75000/house<sup>1</sup>. If this is the going rate for developer contributions, then about 150 houses would pay for all the cycle routes proposed by CCC!

## 3. Bypasses and active travel

The preferred option couples new road building with opportunities for improving cycling and walking primarily in Canterbury but, as we have already pointed out, these are independent activities. It is quite possible to have the eastern and western bypasses with no changes in Canterbury road system and quite possible to introduce substantial changes to support active travel without the bypasses.

## 4. Modelling, forecasts and local journeys

In this context, we note that the Jacob's report commissioned by CCC to produce a local transport model specifically states

*These initial forecast scenarios have been developed in order to test the functionality of the Local Canterbury Model rather than to assess the impacts of any particular individual scheme or policy.* (Limitation Statement, p7)

and

*The model used in this project is highway based only and therefore cannot be used in its present form to quantify mode shift from car to sustainable modes.* (Likelihood of modal shift, p93)

Such caveats explain why, for example, as seen in Table 9.3 in the Jacob's report, it refers to 'low', 'medium', 'high' and 'very high' likelihoods of modal shift occurring. Without some quantification of 'likelihood' any outcomes and transport forecasts in the proposed local plan should be best viewed as informed guesses.

This has implications for aspects of the sustainability assessments and the forecasts made in CCC's *Local Plan 2040: Summary of options carbon emissions*. For example, the statement on page 7 that

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<sup>1</sup> <https://www.kentonline.co.uk/canterbury/news/first-look-at-new-kent-super-hospital-242735/>

*... as the traffic model does not reflect changes in travel behaviours, it therefore projects large volumes of traffic taking orbital routes around the city to replace cross-city short journeys. The experience from the Ghent implementation is that many of these journeys will be replaced by walking and cycling in the quieter and safer streets and improved walk and cycle ways: This reduction in vehicle traffic is what will deliver the overall traffic carbon emissions reduction of this option.*

This suggests that it is local journeys in Canterbury which cause much of the congestion and carbon emissions. As the current *Canterbury District Transport Strategy* notes (p13)

*Cross-city trips make up about half the traffic entering the city during peak times and only approximately 13% of the traffic is through traffic.*

If cross-city journeys are the real problem, then this could be dealt with using tried and tested solutions such as congestion charging, introducing a low/ultra-low emission zone, an annual tax on car parking spaces and improving public transport and park and ride. Combined with measures to promote active travel, this could produce a significant amount of 'traffic evaporation' (see, for example, Rachel Aldred work on this<sup>2</sup>), thereby achieving both a reduction in road traffic and an increase in cycling, walking and public transport use. Effectively removing the need for any bypasses or A28 upgrades.

In addition, the transport strategy (p24) recognises that road building is not a solution to traffic growth

*4.10 It has long been recognised that building extra road capacity does little to solve existing traffic congestion and can actually increase traffic on roads. There is likely to be limited funding available for major road building and we need to accept that there is finite road space, particularly in an historic city like Canterbury.*

*4.11 Therefore the way to tackle congestion while maintaining and improving access is to promote alternative forms of travel. This means that those who still need to use a vehicle will still be able get around and those journeys that could be walked, cycled or taken on the bus or train will be encouraged.*

Again, it seems there is no need for any additional road building to deal with congestion and pollution in Canterbury, just investment in cycling and walking and other projects to increase use of public transport. If this reduces local traffic, then through journeys should become easier too, assuming this is seen as a desirable outcome.

## *5. Decarbonisation*

The first strategic priority listed in the government's recently published decarbonising transport report (*Decarbonising Transport: a Better, Greener Britain*, p36) is

*Accelerating modal shift to public and active transport*

- *Public transport and active travel will be the natural first choice for our daily activities.*

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<sup>2</sup> <http://rachelaldred.org/writing/thoughts/disappearing-traffic>

- *We will have a cohesive, widely available, net zero public transport network designed for the passenger*
- *We will use our cars differently and less often, with new technology helping reduce our carbon footprint*

The second strategic priority is decarbonising road transport.

Sadly, CCC's *Local Plan 2040: Road transport options carbon emissions* report makes it clear that all the options selected for consultation will increase carbon emissions from transport, ie

*The evaluation shows that in all cases emissions are projected to increase from the baseline...*  
(p8)

and (Recommendations, also p8)

*This evaluation of emissions from the local plan road transport options shows that without other interventions, all the options are likely to increase the total carbon emissions from the district transport system. Moreover, in order to reach carbon reduction targets towards net zero emissions, significant alternative transport system changes and interventions will be needed.*

*The traffic flow data that underpins this evaluation is not adequate to quantify the potential emissions reduction from the active travel components of the transport options, and in particular option 5 which aims to enable significant modal shift in the Canterbury urban area. A much more detailed and comprehensive multimodal study is required to develop and evaluate option 5.*

As we have already mentioned, there is no technical dependency between the active travel and road building aspects of CCC's preferred option.

As it is only the 'Ghent'/'shared streets' options which reduce (probably) emissions from the Council's preferred option to the point that the Sustainability Analysis shows positive effects, this can just as easily be applied to all of the Canterbury options. *Figure 5: Plan options with carbon reduction policies implemented and option 5 'Shared streets'* (p7, *Local Plan 2040: Summary of options carbon emissions*) makes it clear just how much reduction is possible in all of the Canterbury focus options.

## 6. *Car ownership and housing*

17000 new homes means about 24000 more cars (assuming an average of 1.4 cars/household, the South-east average). 9000 homes will still mean 12500 new cars in the district. But fewer houses will mean fewer cars and fewer vehicle journeys. Apart from parking, car ownership is not itself a problem; it's usage which is important. An important consideration as it has been predicted that there will be an 11% rise in car journeys by 2050 coupled with a 28% increase in car ownership<sup>3</sup>.

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<sup>3</sup> <https://www.ippr.org/research/publications/all-aboard>

## 7. Canterbury and Ghent

Ghent is put forward as a model for Canterbury to follow. However, this comparison is somewhat fanciful. Ghent did not decide to build the R4 and R40 ring roads so it could introduce its circulation plan, which itself is part of the city's Mobility Plan<sup>4</sup>. Ghent has had a mobility plan since 1997 and adopted its first cycling strategy in 1993 (p39, *Reclaiming city streets for people: chaos or quality of life?*, European Commission, 2004?<sup>5</sup>) and has a track record in dealing with the problems caused by cars in the city, finally resulting in the scheme introduced in 2017. The circulation plan, by and large, made use of the existing road network to introduce the zoning system and make the town center traffic free.

Although the comparison may be fanciful this doesn't mean it can't be used to inform CCC's plan. Rather than rely on ring roads which don't exist or dividing Canterbury into six sectors, options such as low traffic neighbourhoods may work just as well and be far cheaper and easier to implement.

### Canterbury focus A

We think the approach used for CCC's preferred option is back to front. It would be far better to invest in active transport across the district as this will reduce the number of vehicle journeys in Canterbury and elsewhere, thereby reducing congestion, air pollution and CO2 emissions and the need for more road building - and save CCC council tax payers lots of money and disruption. Compared to CCC's preferred option it would mean that the quickest and cheapest ways to improve transport in Canterbury for all would be introduced first.

Because of this we support - with reservations - Canterbury focus A as it seems to provide the best balance between growth, housing and active travel and gives a good starting point to further develop active travel to create an 'active travel first' local plan - the 'seventh option'. Focussing development, primarily, on Canterbury will make it easier to support cycling, walking and public transport and, hopefully, by bringing people together to help to produce a thriving and entrepreneurial business environment.

Additional active travel developments in Whitstable, Herne Bay and the villages will reduce the need to travel by car locally if combined with measures to promote cycling and walking, improve bus services and improve local services and facilities.

Canterbury A can be considerably enhanced by adding elements from some of the other options that improve the local environment and reduce air pollution and greenhouse gas emissions. We see, for example, no difficulties in taking the changes to cycling and walking infrastructure suggested by the 'shared streets' approach or building low traffic neighbourhoods and introducing these independently of any other changes to transport infrastructure, for example congestion charging and improved park and ride.

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<sup>4</sup> <https://stad.gent/en/mobility-ghent/mobility-plan>

<sup>5</sup> [https://ec.europa.eu/environment/pubs/pdf/streets\\_people.pdf](https://ec.europa.eu/environment/pubs/pdf/streets_people.pdf)

## **Movement and transport**

Spokes agrees with the statements at the start of *Section 6, Movement and transport*, of the draft local plan, ie

*The transport network connects people and places and is essential for supporting growth in the district and improving the quality of life of our communities.*

*Rebalancing the transport network towards more walking, cycling and public transport and supporting low-emission vehicles are clear government priorities.*

### **Issue MT1 - How can we maximise active travel in the district?**

We do not understand why options MT1A and MT1B are presented as an either/or alternative. We believe combining the two would give a clear statement of the Council's intent to promote cycling and walking. A possible wording for a combined statement is

*We will continue with the current approach to safeguard pedestrian and cycle routes and all new developments must show how they will maximise opportunities for walking and cycling and connect to the current, proposed and safeguarded walking and cycling networks.*

As the Sustainability Analysis shows strong positive effects for MT1B on SAO13 and SAO14, we believe these can only be enhanced by combining the two options. There may also be positive effects on other sustainability options, specifically SAO1 and SAO2 (*Definitions from Appendix L to Local Plan 2040*).

A similar approach could be taken for options MT2A and MT2B and MT2C and MT2D.

In addition, combining MT1A and B could reduce the uncertainties in the Council's *Health Impact Analysis* as there would be a greater likelihood of encouraging physical activity and supporting health.

### **Issue MT4 - How should we set parking standards in the Local Plan?**

We would support option MT4C providing the intention to provide more cycle parking is made explicit. A possible wording could be

*Amend the current parking standards to significantly reduce car parking in the most sustainable locations, to allow for enough spaces in suburban areas, and require cycle parking to be provided at all locations.*

We wonder why cycle parking was not included in the sustainability analysis of this option.

### **Issue MT5 - How should we produce transport assessments, transport statements and travel plans?**

We support the Council's preferred option, MT5C, but would like to see a mechanism for assessing the implementation and effectiveness of the plans to stop these becoming a 'tick box' exercise.

## Credibility

Sadly, CCC lacks credibility when it comes to active travel, especially in supporting cycling or in promoting sustainable transport generally. Warm words have not been matched by expenditure, planning or action.

As far as we know, the only expenditure on cycling recently has been on a few hundred yards extension to the Crab and Winkle Way in Whitstable. CCC's *Authority Monitoring Report April 2018 - March 2019* - the latest listed on the Council's website (as at 30 July 2021) - lists just three cycling projects using Section 106 money, ie an upgrade of Lansdown Road cycle route, pre-construction work on the Asda to Vauxhall Avenue section of the Herne Bay to Canterbury cycle route and pre-construction work on the Crab and Winkle extension. These are also the only cycle route projects listed in the previous year's *Monitoring Report*.

Policy 5.2 Cycling in the *Canterbury District Transport Strategy 2014-31*, adopted in July 2017 states

*We will encourage cycling as an alternative to the private car for local journeys through a comprehensive network of cycle friendly routes and cycle related improvements*

Yet again, as far as we know, little - any? - progress has been made on any of the 37 'cycling actions' listed in the *Strategy* (pages 83 -88, references B1 to B37).

If CCC have carried out any work in the district on improving, extending and building cycle routes and facilities for cycling, either those uniquely for cyclists or as part of other work, for example of active travel or junction 'improvements', Spokes will be delighted to receive details and will happily list them on our website and in our monthly newsletter, *Update*.

## Conclusion

We recognise that creating a local plan is a difficult process. However, we believe that the Council's preferred option is flawed as it does not start with ways to promote active travel but sees these as an addition to be afforded only when additional housing and roads have been built. As mentioned above, we believe this approach is back to front - investment in active travel should come first. In addition, as we hope we've pointed out, the evidence base to support CCC's preferred option is partial and not especially robust.

We support Canterbury focus A proving there are substantial additions to promote active travel and public transport in Canterbury, Whitstable, Herne Bay and the villages combined with measures to limit vehicle journeys. This is the best way to meet the plan's vision and strategic objectives in an environmentally and sustainable way.

Publishing targets, including dates, and providing clear priorities for active travel projects as part of the plan could also help re-establish CCC's credibility and commitment to sustainability in the district.

Spokes is, of course, happy to discuss any aspect of this document.