



9 August 2021

Response to the Local Plan 2040 - Options consultation

The options paper published for consultation has a number of significant deficiencies and omissions due to a lack of supporting technical data and adequate assessment. The preferred development option is clearly not supported by analyses in the Sustainability Appraisal or detailed documents such as the Jacobs transport analysis (CDLP4). The Plan sets the vision for a future beyond 2040 when travel options, work patterns, housing needs, energy use and production will be significantly different to now. Therefore, the proposed plan needs to be more clearly underpinned by current thinking about urban planning prioritising the environment and health.

The City Council's identified preferred option (C) has significant flaws in terms of sustainability and should be rejected as not conforming to the NPPF and national policies and guidelines on sustainable development. In particular, the Sustainability Appraisal Concludes that the preferred option will have negative impacts on Climate Change (SA Objective 2), Biodiversity (SA Objective 3), Landscape (SA Objective 5), Land Use (SA Objective 11). Given the warnings regarding the need for urgent action recommended by the UN Intergovernmental Panel on Climate Change report published today, and proposed revisions of the NPPF, the Council needs to reconsider its preferred option.

The need for action to improve the natural environment and reduce negative impacts on people's health has already been highlighted by the Environment Agency in their report on the *State of the Environment (2020)*:

The coronavirus pandemic has exposed and amplified green inequality in society. Too many towns and cities in England, especially those with a strong industrial heritage, have too little green space, too few trees, culverted rivers, poor air quality and are at risk of flooding. This holds back economic growth and the building of new homes. It's also a fundamental moral issue. Areas of higher deprivation and Black, Asian and Minority Ethnic populations have less access to high quality green and blue space and this contributes to differing disease burdens and life expectancy.

Creating, and connecting people with, green or blue spaces will support new local jobs and benefit health and wellbeing. This is why it is important that the recovery

from coronavirus is a green recovery. The pandemic has led to an increased appreciation of nature and more engagement with the water environment, we need to build on this revitalised interest in the natural world to achieve something that is better and that lasts. (Emma Howard Boyd Sept 2020).

This quote by the Chair of the Environment agency clearly sets out the context for future local planning. She ends her introduction to the report by highlighting that *“The physical and mental health of everyone depends on quality green and blue space, and it reduces the burden on the NHS. At a time when there is such widespread recognition of these essential facts, we should value work to protect and enhance the natural world highly.”* Publications by the NHS and Public Health England – working with the Town and Country Planning Association – set out principles and guidelines for putting health into place, similarly emphasising the importance of health and the natural environment as key issues to be addressed in strategic planning.

The current preferred option for development contains proposals that are more likely to cause poor health by removing much of the local natural environment and reduce access for many people to open countryside and woodland. There will also be significant degradation of the local natural environment which ignores the community and economic benefit of such existing countryside. In addition, the preferred option will increase traffic and journey distance leading to increased pollution. It is likely that the proposals will simply move traffic congestion to other sites.

The Council’s preferred option C should be rejected

There is much to commend many of the key objectives of the proposed Local Plan in relation to the commitment of a net-zero operational energy standard for new buildings including improving whole building energy efficiency for modifications to existing buildings and the requirement to evaluate the embodied carbon for planning applications. But there is a fundamental flaw in the proposal which appears to be based on significant development and road building to improve city centre traffic problems.

Having read the options appraisal and supporting documents for the proposed Local Plan I fail to see why the Council has adopted the Canterbury Focus C as its preferred option. The Sustainability Appraisal Report concludes 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).*

The Local Plan should be setting out a future vision for Canterbury in 2040 and for subsequent decades to come. Yet the planning approach seems to be drawn directly from a vision of how communities and transport infrastructure with a focus on individual car use. This “vision” will have disastrous impacts on our local environment and on carbon

emissions, fails to solve traffic congestion - simply redistributing traffic - and fails to meet national planning guidelines and requirements to achieving net zero by 2050.

The Council's preferred option is large-scale development focused on Canterbury with construction of new roads aimed at reducing traffic congestion and air pollution on the existing A28 ring road. The proposal involves significant house building (14-17,000 houses) well in excess of the required number of 9,000 houses. The resultant environmental damage caused by such large-scale house and road building will far outweigh any benefit that might be obtained on the inner ring road. The carbon impact of the house and road building will lead to the loss of important open space, wooded areas, agricultural land etc. These are areas of significant community and environmental value. Economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure.

Section 19(1A) of the Planning and Compulsory Purchase Act 2004 places a legal duty on local authorities to ensure climate mitigation and adaptation are integrated across all local planning policy. In addition, the revised draft plan will be published in 2022 when it will need to conform with the revised National Planning Policy Framework to be published this year. The draft NPPF *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects*

The Council's preferred option with new "bypass" proposals is not supported by the Sustainability Appraisal where bypass options are not assessed, or by later the transport modelling report. The Jacobs's traffic report (CDLP4) does not support any particular option as having benefit over other options. In fact, the report's conclusion is that "... *there is no single stand out option that could be recommended for solving the existing local and strategic issues in the network.*" (Jacobs (CLP4.02) p6). Also, surprisingly given the emphasis in the proposals on sustainable transport, the assessment has no analysis of public transport, cycling and walking with only limited modelling undertaken (ibid p14). The introduction of the report refers to the objective of "... *shifting the modes of transport used, promoting all possible transport choices including walking, cycling, the use of public transport and introduction of park and rides, and work on removing dependency on private car usage.*" (ibid p9). The Council's preferred option is **ranked worst for public transport accessibility** (Jacobs chapter 8) and therefore likely to increase car usage.

There has been reference in the media by the Council Leader and in the Jacobs's report to the adoption of the Ghent solution. The Jacobs's appraisal for Scenario 5 quotes the example of Ghent - where the inner city has been sectioned into several discrete zones with 'blockers' installed to prevent rat-runs being used by shortcutting cars traversing the inner

city. This is held up as a solution for Canterbury without any consideration of the different road layouts, the lack of a complete ring road structure around Canterbury and no detail of how such a zoning system would be applied to a small city like Canterbury. Ghent has an urban area population of some 450,000 people, an existing complete inner and outer ring road structure and substantial public transport and cycling infrastructure in existence. The proposed new roads shown in Section 4 of the Jacobs document do not constitute a full ring road but two partial bypasses. The arterial access is more limited in Canterbury and Ghent also has a well-developed public transport and cycle path network. The comparison between Canterbury and Ghent is not valid.

The Council argue that the preferred option C will deliver more sustainable travel options due to the increased infrastructure investment resulting from building more housing than required by Government. However, the Sustainability Appraisal notes that such development would also bring additional car traffic and in the absence of any analysis of sustainable transport options – for example no assessment of current usage data of buses and trains, pedestrian and cycling trips – the argument is simply supposition. Based on the sustainability and technical appraisals the result of the preferred option could equally lead to increased car use, longer car journeys, increased congestion and a further erosion of more sustainable transport modes. There is no reference at all to the potential for developing new railway stations only trying to make existing stations more accessible and linked to other sustainable transport modes.

The proposed options appear to have been developed without consideration of different patterns of working and travel arising from the COVID pandemic. Further consideration is needed in relation to choices of travel mode and hybrid working, influence on tourism and current patterns of journeys across the city, in particular vehicles entering and leaving the outer and inner cordons. Currently there are significant deficiencies in the transport analyses that provide any justification for the Council's preferred option.

Lack of analysis of health impacts of plan options

There is a lack of any public health assessment of the impact of the options on population health. As is often the case, the health assessment in the Sustainability Appraisal focuses on availability of health services and access to them. The NPPF and Strategic Environmental Assessment guidelines stress the importance of assessment for human and population health. No assessment or analysis has yet been undertaken in relation to this. It is not clear how the proposed plan tackles key health issues. The current assessment is rudimentary. The Sustainability Appraisal assessment of health is extremely limited focusing on population structure and some limited data on general health. It does identify areas of higher deprivation and that people in Canterbury have reported higher levels of poor health than in the South-East or for England as a whole and that more people have some limitations in their daily activities. There is no reference to the Joint Strategic Needs

Assessment (JSNA) as required by the NPPF and SEA guidance. The JSNA should be a key local/regional policy document. National policy documents on issues such as planning and health published by the NHS, Public Health England and the National Institute for Clinical Excellence should also be referred to.

Critically more emphasis needs to be placed on retaining and protecting as much existing natural environment as possible and ensuring continuing access to this. Public Health England published a guide in 2017 (*Spatial Planning for Health An evidence resource for planning and designing healthier places*). The guide highlights the importance of retaining natural environments “*There is a very significant and strong body of evidence linking contact and exposure to the natural environment with improved health and wellbeing. For the purpose of this review, the natural and sustainable environment is comprised of neighbourhood ecosystems and the resulting co-benefits between the environment and health. Protecting the natural environment is essential to sustaining human civilization.*” A key aspect of this analysis and focus should be on the Plan’s impact on inequality. The recent Environment Agency report *The state of the environment: health, and the environment* (Sept 2020) highlighted key health issues that need to be addressed in strategic planning:

- **Mental health conditions are increasing - they are the largest single cause of disability in the UK, and can be caused or affected by pollution, flooding and climate change**
- **There is substantial and growing evidence for the physical and mental health benefits of spending time in the natural environment, but children are engaging less with nature**
- **Exposure to pollution, and access to the natural environment are not equally distributed across society - people living in deprived areas often have poorer quality environments with less accessible green space**
- **Equality of access to, and connection with, a healthy natural environment would save billions of pounds in healthcare costs and reduced economic activity every year**
- **There are opportunities to improve health through the choices government, regulators, businesses and individuals make in creating and contributing to healthier, greener and more accessible environments**

The plan tends to focus on health primarily in relation to travel options and pollution from traffic. The emphasis on air quality is welcome but by 2040 we should be experiencing a marked reduction in vehicle emissions due to government policy banning the sale of new petrol and diesel cars from 2030 and hybrid vehicles from 2035. The major source of emissions will be from housing and commercial activities and a focus on local sustainable energy production and energy networks would be useful.

Proposed housing sites in the land between the Littlebourne Road (A257) and Sturry Road and north the railway line and Littlebourne Road will significantly decrease access to the natural environment for people living in more deprived areas of the city. The exclusion will be exacerbated by the construction of the proposed eastern bypass. Yet a local plan policy is to *“Support equal access and improvements to green and blue infrastructure, the countryside and open spaces including parks”* (14.1). Currently the proposed preferred option will fail to meet this policy goal. In terms of promoting health the only objective is to *“Promote healthy lifestyles including through sport and physical activity”* (14.5) However, option C removes access to open space and there is an odd reference on p59 of the Sustainability Appraisal to *“Improving the deprivation within the District “* As a result it is bizarre that the Sustainability Appraisal gives option C a positive result for health. Any objective and real assessment of the overall impact is clearly negative. The mitigation factors focus on improving access to sports facilities and countryside and improving access to and gaining developer contributions for healthcare facilities. Negative aspects of environmental degradation are completely ignored as is the impact of option C on limiting equality of access to local countryside.

The current sustainability assessment on population health is inadequate to make any assessment of how options will affect population health. The council need to undertake a more thorough health impact assessment of their options before identifying a preferred option.

Conclusion

There are several deficiencies in the approach to identifying a preferred option. The Council has proposed a preferred option that is not supported by the technical documents. Option C is likely to cause most detriment to the natural environment and people’s health. Proposals for large scale development of 14,00-17,000 houses and additional roads are not supported by any evidence that it provides the most sustainable or effective approach to addressing the future development of the district. I have focused on sustainability and health, but I also recognise that there are other key weaknesses in the current proposals. These include questionable population growth estimates, lack of attention to addressing social and affordable housing needs, lack of consideration of Kent wide development strategy which sees major growth centred on Ashford, non-consideration of proposed major housing development between Faversham the A2 and Bramley Corner among several key omissions.

The City Council’s identified preferred option (C) has significant flaws in terms of sustainability and should be rejected. The starting point for the plan should be on developing local neighbourhoods rather than large scale development. The Council needs to place walking, cycling and public transport at the centre of its planning process drawing on

well accepted principles of environmental sustainability and principles of “health into places”.

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