

CANTERBURY LOCAL PLAN REVIEW - 2020 – 2040

CCC DRAFT OPTIONS PAPER May 2021.

Oaten Hill and South Canterbury Association Response

8th August 2021

Summary

The Review of a Local Plan is an important event, because it generally replaces the existing Plan in key areas, and has a twenty year life, ie to 2040. There will be further Reviews, from 2025 onwards, but the terms of this Review will be in force until then, so this is an important document.

Positives

The first positive aspect of the Options that we would like to congratulate the Council on, is that while we fundamentally disagree about the means, we do welcome the Council's acceptance that traffic congestion and health impacts in Canterbury can only be addressed by fundamental clean air control measures, and a major re-prioritisation of city centre roads away from the needs of the motor car and in favour of cycling, walking and public transport.

Secondly, the commitment to zero carbon standards for all new building by all parties is also welcomed, with reservations as noted below.

Negatives

Unfortunately, we cannot support this Review because

- The Options concentrate narrowly on a traffic and housebuilding agenda, and major expansion of the town, but omits any general review of the effectiveness or fitness of the 2017 Plan. We believe the Review should also look at Canterbury's current distressed financial and social position, and set out an outline Covid pandemic recovery plan.
- The content of the consultation documents is not fit for purpose, as proposals are made without sufficient evidence, are incorrectly or unfairly justified, and without examining alternative Options
- The proposals deviate from the Corporate Plan (both the current Plan and the replacement proposed in June) in respect of seeking to impose a major growth area trajectory on Canterbury, which is not part of the Corporate Plan,
- The preferred Option B will cause major damage to Canterbury's social environmental and economic fabric, by building up to 17,000 new dwellings and two new roads and the proposals do not comply with CCC Corporate Plan Objective 1 on Climate Change

2107 Plan Issues

CCC regularly report in their Budget Consultations how HMG grant monies continue to be cut, and how they have to respond by cutting services, and raising charges. CCC stated in January 2021 that they would reach the limit of fiscally prudent drawings on reserves, by 2022.

Two issues as examples stand out –

- the increased numbers of homeless people, now returning to our streets, need permanent accommodation and support solutions, which will be costly, but are essential.
- CCC have taken over direct management of both the refuse collection system, and the council housing stock. The former lost money, and performed badly, - how will CCC avoid repeating the same inadequate performance without increasing funding, which is not currently envisaged or

possible. The latter is in poor condition, was badly run and poorly maintained, but CCC noted in the 2021-22 Budget proposals that they would be cutting back on housing maintenance even further.

We also note that Land Securities have recently announced that 25% of all their retail premises will shortly become unviable and are earmarked for conversion to other uses, notably residential use. What is the financial position of the Canterbury High Street retail, which forms a large part of the income portfolio of CCC?

Canterbury is also in the unfortunate position of defaulting on its obligations to create mitigating measures for the portions of city centre roads that break the legal limits for pollution, harming residents health, and is therefore potentially liable for future legal action following the Ella Kissi-Debrah inquest judgement.

We could continue our list, but are concerned that on financial and humanitarian grounds, CCC should adopt a transparent approach to detailing its difficulties, and to sketching out effective action plans for consultation.

Covid recovery will hopefully be good, but it is not acceptable for the Council to adopt the position that the future will be a clone of the past, in the face of all the advice to the contrary. While it hopefully will only last for a few years, the altered way of life that will be necessary for all of us is surely worth a chapter on short term measures that need to be taken, to maximise our recovery prospects, and minimise the damage and loss being suffered by sections of our community in the meantime.

Fitness for Purpose

OHSCA believes the Options methodology is completely unacceptable because it avoids dealing with two interlocking questions in relation to the plan proposals, both of which are fundamental elements in any feasibility appraisal process.

• COST - how has the number of housing units been arrived at, as the road scheme it is to fund only has an outline design, no housing locations are identified for it to serve, and is not costed.

• DELIVERABILITY - where is the design detail and analysis of the proposed road network, from ring road to inner city, that adequately demonstrates the need, and the ability to deliver the significant reductions in car use and congestion, taking into account not only new congestion impacts arising from the 16,000 * agreed units in the current plan but the further congestion impact of the 17,000 new units, whose design and location does not yet exist?

We believe the housing and road plans are meaningless as there is no detail to justify the proposals either in terms of cost or deliverability. Nevertheless the Council have assessed the number of houses they want permission to build by reverse-engineering the amount of Section 106 monies required to pay for a comprehensive new road scheme, and are asking residents to sign a blank cheque, worth approximately £200M. The only certainty about their Option B is that the environmental impact of 17,000 houses will be immensely harmful.

The process proposed by CCC to debate and agree these Options is not fit for purpose because it fails to detail methods or scenarios applicable to each of the Options for providing for the differing needs of the various sub-communities of district residents, including city centre businesses and visitors. These scenarios should take account of environmental, economic and health costs and impacts, for example by building the very large number of dwellings for Option B, and the transition to a nearly car free centre. Residents and visitors cannot react to a blank canvas or argue with assumptions that optimistic outcomes will be delivered by some as yet undiscovered means in the future.

We set out below various observations regarding the Options created by CCC, and others that they have not so far considered, to try to develop criteria that should be used in assessing the various options. It is our opinion that the simplistic road and house building programme being promoted is untested, unimaginative, and unworkable.

Corporate Plan

As we detail below, CCC in this document have departed from the adopted and the new Plan, but creating a vision that is entirely different in degree from either the Canterbury we recognise, and the incremental growth model that successive Local Plan and Corporate Plans have set out.

This issue should be explicitly put to the residents, with a full appraisal the strengths and weaknesses of such a change in policy – because there will be adverse impacts, and there are alternatives.

Our proposals

1. We recommend that CCC radically revise the remaining stages of the Local Plan Revision process, and insert a second consultation exercise before the Draft Plan consultation, in which they re-present a full range of development and Plan revision proposals with proper evidence on how they will work in detail, what the proper comparisons are between options, in terms of deliverability, cost, environmental and social impacts.

These should be accompanied by resident workshops and seminars to present, debate and discuss them fully, covering the whole district. From these inputs, the Draft Revised Plan options can then be fairly and responsibly devised.

2. We also recommend that CCC and KCC immediately embark on setting out options, fundraising, and moving to field trials, of schemes for better management of city traffic and pollution, and encouragement of modal shift, for example Clean Air Zones (CAZ). It is clear that much of the impetus for the proposals comes from the CCC recognition that the cumulative increase in traffic and pollution arises from development over the last decade, which CCC and KCC have failed to predict or manage.

These will be valuable for assessing feasibility, breaking the alleged link between excessive development and road improvements, and there is no reason why harmful effects of current pollution and congestion must be endured for another five to ten years before the next Plan is adopted and new CIL/ Section 106 monies begin to accrue.

3. We recommend that CCC immediately set up feasibility studies with development, commercial and transportation partners to test the viability of free standing settlements, as the preferred option for new housing development, which should be located with an existing rail connection at their centre.

Context

The Review Options are defined by the Committee Paper of 27 May voted for by the Planning Committee. (Not the consultation website pages).

Article 174 of the Treaty provides that Community policy on the environment is to contribute to, inter alia, the preservation, protection and improvement of the quality of the environment, the protection of human health and the prudent and rational utilisation of natural resources and that it is to be based on the precautionary principle.

- The Draft Vision
- Strategic Objectives
- Growth
- Town Centre Strategies
- Housing and New Communities
- Employment

- Town Centres
- Movement and Transportation
- Historic and Natural Environment.

The Proposals - Summary

CCC have issued their Options Paper which sets out their interpretation of the feedback provided in the Vision workshops in the Summer of 2020, and is stated to be compliant with the new Corporate Plan presented to the same Committee for endorsement.

In particular, the preferred spatial form proposed for the housing expansion is strongly skewed towards Canterbury, rather than the coast, or a free-standing settlement.

It is also proposed to provide not the mandatory 9,000 units as indicated by the Census analysis, but a range of between 14,000 – 17,000 units, dependent on costings and grants.

This will increase road use in the town road network, which will thus require intensive mitigating measures, which it is stated will cancel out new traffic loads, as well as relieving existing inner road traffic loads, permitting a major shift towards active travel and public transport, and widespread health and quality of life improvements.

HOW SHOULD THE OPTIONS BE ASSESSED?

What are the relevant criteria for a Local Plan Review?

0 EU Directive 42

CCC state that there was a SEA (Sustainability Environmental Assessment) carried out last year and the SA presented now continues that process, applying the same criteria to review the Options.

We believe this is a spurious exercise, because the SEA has no quantum, or numerically defined limits or criteria. The options are thus only able to be relatively assessed against each other.

This is incorrect: We have already seen in respect of Mountfield Park that the Environment Agency does not agree with the SA used by Corinthian, and approved by CCC, in respect of nutrient pollution fed from the development into Stodmarsh Nature Reserve. It will kill or seriously damage the waterbourne organisms at the bottom of the food chain.

If we refer to the EU document Directive 21001 / 42 that requires SEA's to be carried out, it states

Article 174 of the Treaty provides that Community policy on the environment is to contribute to, inter alia, the preservation, protection and improvement of the quality of the environment, the protection of human health and the prudent and rational utilisation of natural resources and that it is to be based on the precautionary principle.

Preservation is not relativistic, and there are no mentions of tradeoffs between benefits in one of the three (social, environmental, economic) sectors, to offset losses in others.

1 NPPF Policies (Criteria)

All Local Plans are required to comply with the objectives of the NFFF.

NB – between publication of the Options and the closing date for responses, HMG has published the 2021 update of the National Planning Policy Framework. While it can be argued that the proposals should be judged against the 2019 version applying at the time of preparation, clearly the 2022 version of the proposals which will be issued as detailed options for further consultation will be assessed against the 2021 version, so we use this standard in our comments.

The high level framework of the document is clear:

The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs⁴.

It goes on to spell out

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways :

- (a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- (b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations
- (c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Further:

11 For plan-making this means that:
a) 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; (our underlining)

And

11 b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas(our emphasis).

National	The Climate Change Act 2008 This requires all legislation to take account of the requirements to reduction of carbon use so as to achieve the target of zero emissions by 2050.
Local	Plans should be based on The current Corporate Plan (2021 version) including the CCC Climate Emergency Resolution 2019.

3 OHSCA Criteria

We with ACRA (The Alliance of Canterbury Residents Associations) expect our Council to follow the precepts of

Good Governance - CCC/KCC policies should comply with the NPPF and CCA2008 objectives, be transparent, fair, and competent

Zero Carbon Commitment - We support strongly the CCC Zero Carbon Resolution, and the CCAP call for it to be extended to cover ALL activities in Canterbury by ALL actors,

Policy and Resource Neutrality - do not create policies that favour one section of our community over another, and conversely, do not impose harm or disadvantage on specific sections of our community

OUR ASSESSMENT OF THE OPTIONS

"The content of the consultation documents is not fit for purpose, as proposals are made without sufficient evidence, are incorrectly or unfairly justified, and without examining alternative.

CCC Options Paper (pg63) lists five options

- A Preferred Option – which is almost all regards identical to Option B, but in this option there is reference to radical redesign of movement within the city rather than the SWECO-plus scheme
- A Growth focussed on Canterbury, 9,000 new homes for the whole district, limited growth at the coast, PLUS ring road SWECO scheme for increased walking / cycling, improved Park and Ride
- B Growth focussed on Canterbury, 17,000 new homes for the whole district, limited growth at the coast, PLUS ring road SWECO scheme for increased walking / cycling, improved Park and Ride PLUS upgrading A28 with a bypass.
- C Coastal focus, 9,000 homes for the whole district, new Park and Ride at Whitstable, coastal public transport improvements
- D Mainly rural focus, 9,000 houses for the whole district, improvements to public transport
- E New free-standing settlement, minimum 9,000 homes with comprehensive infrastructure
- The **Jacobs document** looks at five scenarios, but not the same as the Options:
 - 1 No change from the current Plan
 - 2 The majority of the new housing in the Whitstable and Herne Bay areas
 - 3 The majority of new housing in the Canterbury area, plus SWECO ring road improvements

4 The majority of new housing in the Canterbury area, plus SWECO ring road improvements, plus new Eastern and Western bypasses

5 The majority of new housing in the Canterbury area, plus SWECO ring road improvements, plus new Eastern and Western bypasses, plus Ghent road scheme (Option B)

(‘Ghent’ relates to the Dutch town where traffic and road measures have recently been adopted that CCC are basing their design approach upon)

There is a major omission in the assessment: Jacobs does not assess CCC’s Option E – the free standing settlement.

The four schemes for new works are clearly illustrated in Section 4.

The CCC paper presents and commends the Growth Options in the Vision and Strategy sections, where the document confuses assumed results with aims:

"The Vision is supported by strategic objectives which set out how the district will be developed".

This is nonsense – the list of supposed outcomes are in fact sub-clauses of the Vision summary. The ability of the proposed Option to generate these outcomes is nowhere justified.

LACK OF EVIDENCE AND ANALYSIS IN SUPPORT OF PREFERRED OPTION / OPTION B.

Jacobs Final Report

Deliverability

Section 4 (and technical layouts in the appendices) are fundamentally flawed because they are not deliverable, and the impacts of two roads plus 12,000 houses or so are not assessable because there are no designs.

The routes for the new roads are cross country, but there is no information on safeguarding the land: have affordable purchase options been negotiated? If not there can be no financial appraisal as the price is not known, and the scheme would collapse if negotiations broke down, unless CCC /KCC were willing to use compulsory powers.

Planning permissions may be refused for the change of use, if the current status of the land or part of the land is legally protected, as is likely.

As no housing design has been carried out, access points and traffic loading for the new roads cannot be analysed, and basic road capacity viability cannot be assessed.

Need and functionality

There is no evidence or Baseline Study offered in the CCC Options Paper for the preferences promoted.

The Jacobs document analyses the performance of the road systems in the four of the five CCC Options, but has no commentary on the housing numbers or distribution.

CCC Option E is not assessed at all. This is discussed later.

We note that the Jacobs appraisal for Scenario 5 (CCC Option B) quotes the example of Ghent to support the preferred Option 5, in particular re the 'blockers' to be installed to prevent rat-runs being used by shortcutting cars trying to access the inner ring road, but no details are given. In fact Ghent is a larger town than Canterbury with an existing complete inner and outer ring road. The proposed new roads shown in Section 4 of the Jacobs document do not constitute a ring road but two partial bypasses, and the comparison is not valid.

There is no effort made in the Jacobs document to give details as to how any local part of any of the options would work, except for the analysis of the lane allocations of the re-modelled ring road, between vehicles and other forms of transport.

Instead, the commentary assumes that the purely physical changes to the road system will deter or induce drivers to use other roads than the inner ring road. This is a fundamentally flawed approach.

This element of analysis is needed for assessing ALL of the Options, in order to show up the potential for localised redesign of road systems. Such as introduction of 'blockers', and in our opinion would be capable of showing that with the right kind of committed approach and funding, the traffic load displaced from the ring road would be reduced, and could be accommodated with minor additions to the existing road network at reduced cost.

Network Analysis

It is plainly stated at the outset of the Report that the model used (Local Model Validation) to predict the trip numbers is a new variant developed in 2019, based on the KCC Visum model, but tuned to the particular aspects of the Canterbury District.

Some aspects of the new model are confusing: the 4th slip (Dover bound off traffic) at A2/A28 Wincheap junction is omitted, to reflect the recent ruling that the design fails DoT standards and has to be redesigned. Surely, in a 20 year plan, some future new design must be presumed to be built? Its existence will have a marked impact on Canterbury west traffic.

The claims for the proposed new road from Sandwich Road to Sturry Rd must be supported by a rigorous investigation of the inner and outer cordon flows: we believe the figures from the 2015 Transport Strategy studies show that that only approximately 20% of traffic on the ring road is on a East West through journey. If this is the case, the justification for the new road collapses.

For example, most of a new road will be constructed between Sandwich Road and Littlebourne Road as part of the approved Howe Barracks development – the final connecting link would be economic to build, and minimally disruptive, but a useful link to divert traffic away from the inner ring road.

Modal Shift / Active Travel

The Jacobs Report fails to consider either in principle or detail, any of the complementary people – moving schemes that are fundamental components of any transport strategy.

What are the current conditions and numbers of users, what are the possible redesigned conditions and number?. For example, even the notoriously optimistic Mountfield Park Travel Plan took the trouble to spell out how a large scale deployment of e-bicycles together with subsidies for electric cars and enhanced bus services would reduce car trips by between 10 – 25%.

At 9.1 the Report says

"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.... The model assumes that the level of car journeys remains fixed, no matter how much easier it is to walk or cycle the volume of car journeys will not change. Also, journey time analysis is by car only whereas it is known that most trips in Canterbury made by car are short trips which could be made by walking or cycling with sustainable transport options in place."

There is therefore simply no measurement attempted of numbers of people choosing modal shift, or Active Travel, and no investigation of the components of a mixed mode system. The concluding sections of Many have argued over a period of time that seamless travel routes are required to persuade people to change mode, including options to switch mode if distances are long or weather adverse, so interchange hubs are essential between cycle, but, walking, train, taxi etc.

but 30% increase in the network in the South Canterbury suburb, even after a generously optimistic assessment of modal shift measures to reduce trips by at least 5%.

Finally, calculations of trip rates for new households are improbably optimistic.

We suggest that Secn 7 – Journey Times – also needs considerable clarification and review to aid comprehension.

Within this section, we see that tables in 5.2.4.1 suggest that trip rates per household may be **0.185 /Hh in the morning: this cannot be a credible figure as given** – further discussion is needed.

Errors and Confusion in Jacobs growth assumptions

The scale of the 48% increase in dwellings may in fact be greater, as many of the detailed assessments are contradictory.

Section 5 – Forecasts of anticipated traffic flows under the five options - includes various tables or graphs illustrating where the new housing would be sited, but the figures for new HouseHolds (HH) are presented in a complex and apparently contradictory fashion.

Table 5.2 lists new developments assumed to be built, totaling 10756, which in contradiction to the LP Options Paper stating between 14,000 and 17,000 new dwellings will be required to deliver the preferred option, and the HNA Report that states that 9,000 dwellings is the target set by HMG.

In addition table 5.5 lists new HH's in various permutations, and suggests at one point that the increase will be from 68,567 to 86,876 HH, ie 18,309, and at another point that it will be 22,256.

These sections need re-presenting in a rationalised and coherent fashion so that figures comply with each other, and published statements in the overall Options Vision documents.

LACK OF EVIDENCE AND ANALYSIS FOR OPTION E – A FREE STANDING SETTLEMENT.

CCC bias in Options Appraisal.

The Baseline Analysis is inadequate and posits new road building as the only lens through which Options can be assessed, and adding to the urban envelop of Canterbury as the only way to fund it.

The new edition of the NPPF states

Para 73 requires large scale housing developments to be supported by “a genuine choice of transport modes”.

“(The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)”

In 2008 CCC did at least commission a report on the relative merits of Canterbury / village / new settlement siting of new dwellings. On this occasion, there is no such research. Instead the Council offers it as a self-evident truth that you can't have your cake and eat it – we can only build one new road system. Therefore any worthwhile development option in Canterbury depends on a massive road building scheme, because we already have an major congestion problem that will steadily worsen as the 16,000 houses already consented are built.

Thus CCC have determined that new road building is the solution to the congestion and health problems of Canterbury, because they have abandoned attempts to deal with the issues using proportionate and incremental responses. Earmarked funds must be raised .

The CCC Options Paper therefore dismisses the Free Standing Settlement Option as tending to require high spending on new infrastructure, which will deplete the budget available for the major improvements for Canterbury that they believe we must necessarily have. This a travesty of an argument.

Because they clearly now accept that there will be a significant new congestion burden created by the major new schemes that they have already given consent for, which requires new infrastructure which has no funding, the scale of the new building is intensified, and results in the 14,000 – 17,000 estimate.

What is a freestanding settlement?

CCC do refer in their Options paper to the need for sustainable living in new communities

Option 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.

This is a worthwhile but extremely modest aim with very limited scope, and in fact contradicts the Jacobs Report assessment that to be classified as local, journey times can be 30 minutes duration by car, bus, or cycle/foot. It does not discuss the issues involved in genuinely stand-alone communities.

The generally accepted threshold level for new settlements is 20,000 persons or 5,000 dwellings.

As a matter of interest , Mountfield Park if expanded slightly would satisfy this definition. This would surely be possible to arrange, by taking 1000 dwellings out of the 9,000 – 17,000 pot that CCC are contemplating.

It has been argued in the Travel Plan for MFP that the settlement is 'largely autonomous' , as a justification for the very low trip rates in the VISUM modelling that Corinthian and RGP put forward leading to their declaration that the increase in congestion caused by MFP would be as low as they state – no more than 33% on Old and New Dover Roads. We disagree with these assessments of trip rates, but have argued in the past that MFP infrastructure, employment and cultural provision should be enhanced because the autonomous settlement concept is of the few feasible ways to mitigate and contain the impact of large scale new building.

We believe that CCC should therefore be investing heavily in the conceptual development of valid models for free- standing settlements, with the relevant development and transport partners. With an attractive and robust local cultural and employment establishment, with strength and variety, there are strong possibilities that the number of off-site trips would be significantly reduced.

The counter-tendencies do need thorough investigation to develop measures that would limit the trips rate off site: there is a very strong comparison shopping tendency among all sections of our populations, leading to off-site high trip rates to major destinations – eg Blue Water, large amusement attractions, megastore supermarkets, high quality comparison shopping outlets for consumer goods or clothes.

For this reason we expected to see CCC committing to investigate strategies to help establish autonomous districts, as part of their wide-ranging urgent examination of the impact of the internet on the our High Street shopping, on which CCC's economic well-being depends.

Review of these strategies and development of relevant criteria need to be reviewed as part of the options Appraisal for the new housing required – whether it is at the 9,000 or 17,000 level, if there is to be a genuine comparison. criteria.

An example scenario

Mountfield Park at 4000 dwellings occupies 232H, including roads, commercial and community uses, At a net density of 17dw/H.

This is a low to medium density development.

To minimise land take for ecological reasons, and utilise more compact building forms for carbon reasons, the density for a new settlement would be higher.

However, using 47dw/H, a free standing settlement of 2Km radius gross, would be contain 5175dw, above the threshold for free standing settlements.

The maximum walking distance to the centre from any point would be 15 minutes, making car trips very much less likely.

The potential site maps published by CCC for the 17,000 dw option extend as far as Littlebourne, ie 5.75km or 3.6m, and the walking time to the centre of Canterbury would be 1h 15min, encouraging most residents to entertain a bus or car trip.

In a fairly large town such as that which Canterbury would become under the Preferred Option, only the provision of intensive high quality public transport would curtail the demand for car and bus transport, and this does not form part of the offer by CCC in their scenarios.

Where could a new settlement be located – CCC failure of Duty To Cooperate

Among the Evidence documents deposited by CCC are some SoCG's – Statements of Common Ground, regarding consultations with Ashford and Dover. These show that DDC and ABC do not consider the Options as problematic for their own housing projections.

There has been no consultation with Swale or Thanet DC, thus infringing the NPPF requirements.

This is quite surprising with regard to Ashford, as their 2018 Local Plan states in its introduction , that ABC see Ashford as the natural growth area for East Kent, which continues their longstanding overspill/expansion zone status.

It is evident that a new settlement could not be built on the outskirts of Canterbury because of the impact of Mountfield Park, and it is clear that the search for a suitable site would necessarily involve meaningful and cooperative discussions with all the adjoining district councils, or whatever other body might take their place. With such cooperation there is no reason why a suitable site could not be found, so that the Free Standing Settlement Option could be properly appraised.

FAILURE TO SUPPORT ASSERTIONS OF ECONOMIC AND RETAIL GROWTH, AND ENHANCEMENT OF THE HISTORICAL ENVIRONMENT.

The 2010 CCC Corporate Plan presaged this Plan, by boasting that Canterbury would grow vigorously and develop

- A high quality tourism offer with Canterbury becoming a notable tourist Destination, based on its historic fabric and World Heritage Site
- Increased local wealth, with a high income employment offer, with our Universities spearheading a Knowledge economy
- A high quality retail offer

- High quality housing for all.

None of these targets have been met, and CCC / BID efforts to do so have not been successful. The relevant Reports in the Evidence do not provide any argument as to how CCC will do better in the 2020's than they did in the 2010's.

CCC cannot devolve all the responsibility for job creation to its planning department – ie by providing employment land. It must develop detailed working relationships with key providers in the employment categories it seeks to enhance

The document on Historic and Natural Environment, contains no statements of any kind on management or enhancement of Canterbury's historic fabric. The quality of the management and operation of heritage assets has deteriorated sharply since the austerity measure from 2015 onwards have reduced staffing. This means that the day to day enforcement of existing policies is badly delivered, and there is no leadership delivering new policies to enhance as well as preserve our assets, as is required by the framework of all Heritage legislation. Inappropriate and out of scale developments are permitted in many of our central high value areas.

The World Heritage Site status of the Christian religious sites has not been reviewed for more than 10 years, and damage is occurring to parts of the setting of these irreplaceable assets.

What are the future plans and what are the resources to be acquired, to reverse this downward spiral?

An important part of the urban environment, and its attractiveness to visitors, will be the experience of getting to their destination. We comment above about the needs of employers, shopkeepers, venues or all kinds, to deliver their working materials, but above all their customers or visitors. The environmental quality, visitor experience and the effort required to reach destinations are vital elements for the CCC highways planners to successfully handle in designing new layouts. It will be a great challenge to all, and robust transitional arrangements will be needed.

CLIMATE IMPACT OF OPTION B, POOR GOVERNANCE, BREACH OF THE CORPORATE PLAN.

Corporate Plan

We have pointed out that CCC are in conflict with the Ashford BC Plan which claims to be the established growth centre for East Kent.

CCC in their Vision document introducing the Options are in conflict with the Corporate Plan 2020 (Draft). The latter contains no proposition for a major growth agenda for Canterbury – 45% expansion of the town over 20 years, and the proposals in our view are a breach of the Corporate Plan.

Objectives 1 puts Climate Change at the top of all CCC agendas. That is, all other Objectives must be pursued within the restraints of Objective 1.

However, there is no analysis within the Options Paper of the carbon impact of the Options, and none in the key Jacobs Report on roads.

Carbon and Natural Habitat Impact

As we noted in the Introduction, we are pleased to see in the Housing and Community section, that the preferred Option being promoted is for CCC to require all new building to be zero carbon by 2035. This is a considerable step forward on their current undertaking to make all new building/operations in the Canterbury CC estate zero carbon by 2030, because it now covers all third party development, which is a very much larger segment of the economy with a much larger CO2 output.

Equally praiseworthy is the promotion of a regime to require alterations to all existing buildings to be accompanied by measures to reduce carbon output of the whole building to that of current Building Regulations.

However, we believe CCC must go further and include assessment and control not just of the energy required to run the building (**fabric losses**) but also the impact of the whole construction process (**embodied energy carbon**) – which is considerable. This goes above or beyond the Future Homes Standard that will be introduced in 2025.

The massive negative impact in terms of embodied carbon of building 17,000 homes – 8,000 more than are mandatory – cannot be excused. There is no discussion of the issue in the Options study, and of course no ideas on how to reduce impacts.

Construction of the two new roads will be at a massive environmental cost, destroying ancient woodland in the case of the Northern Bypass.

There is no acknowledgement of the current stalemate regarding the prohibition of Nutrient Enrichment of the Stodmarsh Nature Reserve, as a result of which all major new housing developments have been halted until they can demonstrate how they can overcome this outcome in an acceptable manner.

Governance – Inequitable Differential Impacts

Housing Need

We note that the Plan Review outlined in the Options Paper makes no mention of Affordable Housing issues, but the HNA does set out figures that show 1469 households in housing need continues to be addressed by the HNA with a 20 year action plan with dwellings provided at a rate of 73 dwpa.

This is not only callous, with regard to the plight of the residents, but fails to take account of new housing need that will arise over the period.

Affordable Housing – Defaults, definitions.

The Review makes no mention of Affordable Housing, so we assume that CCC propose to continue to demand 30% of new developments be Affordable.

We also note that CCC proposer to demand that developers provide S106 benefits earlier in the construction programme, but that will not affect the rate at which developers effectively default, but submitting Viability Studies after planning applications are issued, that exempt them from the Affordable Housing requirement because the Scheme is insufficiently profitable.

We think CCC should set Viability tests and agreements that are not re-negotiable, and that these should be completed as a necessary condition of planning permissions.

We would like to see CCC redefine Affordable in line with the definition proposed by Shelter that rental costs of a lower quartile house should be no more than 27% of the disposable lower quartile income of Canterbury residents.

Failure to take action on these issues means that the high yielding new housing, in the profitable high asset price district of Canterbury, will continue to produce very large profits for developers and owners, but provide nil benefit for the average salary family on £26,000 pa before tax, faced with a mortgage for a new 2 bed house costing £360,000 – a salary / price factor of 14x