

THE CANTERBURY SOCIETY'S RESPONSE TO PUBLIC CONSULTATION ON THE DRAFT LOCAL PLAN.

Introduction

On numerous occasions over the past twelve months the committee of the Canterbury Society has held meetings with City Council officials and the Leader of the Council. It greatly appreciates the time and effort the Council has devoted to the preparation of this vital document. It also appreciates the extent to which the Council has engaged in consultation with local community organisations, including the Canterbury Society. It would be good to hope that these discussions will lead to a number of changes to key parts of the emerging Local Plan.

The committee of the Canterbury Society has reviewed the details of the most recent draft of the Local Plan, as presented in October 2022. It has also held a meeting with members of the Society, to gauge their opinion of this Plan.

Housing

After careful consideration we wish to record our strong opposition to the new housing numbers that the Plan proposes

The Plan is built around a government requirement that 1120 housing units are built per year during the life of the Plan, and the Council itself has increased that figure to 1263 per year. **This number of new housing units, added to the large number being forward from the 2017 Plan, and predominantly located in and around the city of Canterbury, would effectively almost double the population of the city. It would extend the built-up area of the city far into its hinterland, causing serious damage to the quality of Canterbury as a small cathedral town, set in a green envelope of attractive countryside.**

We would draw the Council's attention to the fact that on the 6th of December 2022 the Secretary of State for Levelling up, Housing and Communities, Michael Gove, stated: **"It will be up to local authorities, working with their communities, to determine how many homes can be actually built, taking into account what should be protected in each area—be that our precious Green Belt or national parks, the character of an area, or heritage assets."** He went on to say that he would be proposing changes to the National Planning Policy Framework to reflect this change of policy and that the Government would be starting a formal consultation on these proposed changes very shortly.

We urge, in the light of this change in Government policy and our estimation that the number of housing units proposed in the current draft would be highly damaging to the character of Canterbury, that the Council take advantage of this change and extend the period for the final drafting of the Plan until the proposed revisions to the NPPF have been clarified and can be taken into account in the CCC Local Plan.

In view of the recent change in Government Policy with regards to housing numbers and our comments above, we suggest that the Council limits the Allocations in the Local Plan

to circa **806** dwellings per annum which was the figure recommended by their own consultants Edge Analytics in the Council's Housing Needs Assessment for the Plan Period to 2045.

In this connection we would draw your attention to the fact that for the 20 year period between 2010 and 2020 **an average of 572** dwellings per annum were built and sold in the District, which would indicate that actual demand is in the order of 600 dwellings per annum. **The allocation of 806 dwellings per annum would therefore still be an increase of 40% above the 20-year average.**

Highways and Transport

We urge the Council, in its response to this Consultation of the Draft Local Plan, to reject the concept of an eastern by-pass and the division of the City into 5 Zones.

We recognise that there is a worsening problem caused by congestion and air pollution on the central road network. The construction of a by-pass and the zoning of the city would be a destructive and untested attempt at a solution. Therefore we believe that the congestion and air pollution caused by motor transport in the centre of Canterbury should be confronted directly, by measures to reduce as much as possible reliance on private cars to make journeys into and across the centre of Canterbury. The by-pass as proposed would i) itself take out a considerable area of green countryside and ii) require the building of a substantial number of houses on greenfield sites, to pay for it through developer contributions. Linked with the concept of a by-pass is the proposal for the division of the city into five zones, with penalties for driving from one zone to another. This appears to represent aspiration and wishful thinking, rather than being based on detailed feasibility studies. This 'zoning' may work in much larger cities, where there are neighbourhood shopping hubs. However, the much smaller character of Canterbury does not allow such hubs, and, as a result, mitigates against a zoning transport strategy as presently proposed. The routing of motor vehicles along the A2 plus eastern by-pass will mean much longer journeys, militating against the emissions reduction pathway, adopted by the Council, of a 25% reduction in car miles travelled by 2030.

The Environment and Biodiversity

We urge the City Council, in its re-working of the Local Plan, to have proper regard to:

- (i) the negative impact on biodiversity of the take-up of countryside for houses**
- (ii) the loss of high-grade agricultural land**
- (iii) the increasing difficulty of dealing with the treatment of wastewater and sewage**
- (iv) the uncertainty of provision of sufficient clean water for households in the district.**

In 2021 Parliament passed into law the Environment Act, which states that the natural environment in England is facing a crisis and requires local authorities to list and safeguard all areas which are valuable for their concentration of wildlife and biodiversity. We ask the Council to identify those areas before the Local Plan allocates sites for

development. There should be a presumption against building on Grade 1 and 2 agricultural land with the increasing uncertainty of national food supplies. The danger of pollution of the land from wastewater, and the difficulties involved in its treatment have become abundantly clear in the district in recent years.

The Old Park and Chequers Wood SSSI

We fully support the campaign by The Friends of Old Park and Chequers Wood to safeguard and extend the SSSI at this location. The proposed Eastern Bypass is an inherent threat to the integrity of the SSSI and contrary to Policy DS18 (Habitats and Landscapes of National Importance) and on this ground alone needs to be reconsidered as part of the current consultation process.

Conclusions and Recommendations:

In conclusion we urge CCC to:

- 1. Extend the period for the final drafting of the Plan until the proposed revisions to the NPPF have been clarified and can be properly taken into account in the final version of the Plan. Not to do so could risk a Judicial Review at a later stage.**
- 2. Adopt housing targets in the Plan that provide for Locally Assessed Needs rather than attempting to use excessive housing development to finance an Eastern Bypass.**
- 3. Reject the proposal of an Eastern Bypass and the division of the City into 5 Zones and instead to work with the highways authority to implement an effective scheme to achieve modal shift on the central road network of Canterbury. This should include the introduction of Clean Air Zones/Congestion Zones, Low Emission zones, better public transport and other options.**
- 4. Provide an evidence-based assessment for the Local Plan of the impact of its housing and transport proposals on the quantity and quality of the area's natural environment and its biodiversity including the Old Park SSSI.**
- 5. Prepare an Infrastructure Delivery Plan that will ensure that all the necessary infrastructure, including Social Infrastructure is provided in accordance with the agreed Plan.**