

CANTERBURY SOCIETY RESPONSE TO LOCAL PLAN (V4)

Introduction

The City of Canterbury is a World Heritage Site, containing Canterbury Cathedral, St Augustine's Abbey, and St Martin's Church. It is surrounded by outstanding countryside, much of which is designated AONB, sites of high landscape or agricultural value, or of Special Scientific Interest. However, it is overburdened with vehicular traffic, to the extent that the central road network is at or near capacity. These are just some of the factors that constitute the 'exceptional circumstances' which the Government has said can justify the use by a planning authority of a method different from the Standard Method in setting the number of housing units to be built over the period of the new Local Plan.

Changes in Circumstances.

There are a number of changes in circumstances that have taken place since the previous Local Plan consultation which call for a change of approach in calculating the housing numbers to be provided over the Plan period. These changes in circumstances include:

1. The Statement by Lee Rowley Minister for Housing Planning and Building Safety on 23rd January 2024 regarding the "new powers and freedoms to Local Planning Authorities in the Revised NPPF dated December 2023." Please read the Ministers Statement below:

Hansard 23rd January 2024

"We have been consistently clear that the standard method is a starting point for Local Authorities in assessing what to plan for and that it does not set a mandatory target. The framework now sets that out in national policy. Local authorities should be in no doubt that the outcome of the standard method is an advisory starting point for establishing housing requirements through plan-making. Again, for the avoidance of doubt, that means that local authorities can put forward their own approach to assessing needs where certain exceptional circumstances exist."

In response to a specific question by Maria Miller MP as to whether the Minister could confirm that there will be more types of exceptional circumstances put forward in the future than there have been in the

past the minister replied: “I am absolutely certain that there will be more cases for exceptional circumstances put forward in the future, and I encourage councils to consider them if they believe that they apply. Logically, I would expect more cases for exceptional circumstances to be accepted by the Planning Inspectorate although that will also be for the Inspectorate to determine on a case by case basis. It is the Government’s intention to indicate that cases for exceptional circumstances can be made, that local authorities should weigh up making them and that, if they feel that they have a strong case through the Planning Inspectorate process, they do so for the good of the communities they seek to serve.”

It is quite clear from this statement that the Government are much more open to consideration of the needs and circumstances within each Local Authority than they have been in the earlier versions of the NPPF, which adopted a “one size fits all” approach to calculating housing numbers based on an algorithm imposed by central government.

2. The decision not to proceed with the Eastern Bypass which was predicated on a significant increase in house numbers to fund this piece of highway infrastructure via developer contributions.

3. The Edge Analytics Housing Needs Assessment 2021 (HNA) commissioned by Canterbury City Council identified a figure of **802 dwellings per annum** as the Assessed Housing Need for the Canterbury District. This was increased to 1149 per annum when the algorithm used in the earlier DLP was applied. **This report should now be reviewed and updated and used to determine the number of dwellings to be allocated in the Local Plan Review.**

4. Historic Over-provision

An Average of 572 dwellings were completed per annum in the 20 years between 2001 and 2021.

The present proposal of **1149 per annum** represents an **over provision of 548** dwellings per annum compared to what has been achieved in the past, which calls into question the need for the unsustainable housing numbers proposed in the emerging Local Plan to 2040.

5. Under delivery

There are two main reasons why Canterbury has consistently failed over the last 20 years to deliver the number of houses allocated in the local plan.

The first is that for a great many people in the District on average incomes, the houses being built are simply unaffordable. If the houses cannot be sold the developers response is to reduce output to meet the demand, resulting in under delivery and a recurring over provision in the local plan which is then carried forward to the next local plan.

The second, and equally important reason, is that over the last 15 years Local Authorities have been prevented from building sufficient social housing for rent or for shared ownership due to funding cut backs by Central Government. This reduction in the provision of Social Housing accounts for most of the shortfall in deliver in local plans over the last 15 years. The solution to under delivery is not to allocate more land than is actually needed but to fund the building of social housing on land that is already allocated.

6. Land Supply and House Prices

The idea that house prices can be stabilized by allocating more land than is necessary to meet the locally assessed housing needs was the main recommendation of the ***Barker Review of Housing Supply 2004***, which was commissioned by the Blair administration to address the issue of high house prices.

Kate Barker was an economist who saw the problem as an imbalance of supply and demand. She was convinced that the that the best and

quickest way to reduce house prices was to increase the supply of land with planning permission for residential development.

This “theory” has been the basis of the requirement in the NPPF to use locally assessed needs as “the starting point “and then add to that by using a formula devised by central government to over-provide supply in an attempt to reduce house prices and stabilise issues of market volatility.

A comparison of house prices between 2004 and 2024 shows that this policy has consistently failed in its principal objective. This is because the supply of land is only one factor in the house price equation and house prices cannot be “stabilized” without addressing the many other factors in the equation.

There were two other principal recommendations in the Barker Report which were needed if the recommendations were to have any prospect of working. One was that central Government should fund the building of social housing for rent and shared ownership. The second was the setting of Regional Planning Authorities so that housing could be provided in the right numbers where needed on a regional basis rather than the narrow basis of local planning authority boundaries. These two key recommendations were scrapped by the incoming Cameron Administration in 2010 which has led to the current housing crisis.

7. Sustainability. The level of housing provision proposed in the Draft Local Plan 2025 to 2040 is unsustainable on almost every aspect you examine it and runs completely contrary to the principles adopted in the Councils Draft Corporate Plan which is based on the UN Sustainable Development Goals. It is an obvious anomaly that CCC should adopted the UN Sustainable Development Goals as the underlying principle in their Corporate Management Plan but fail to recognize these sustainable principles in the emerging Local Plan.

NB: To allocate more dwellings than the Housing Needs Assessment requires is contrary to the principles of Sustainability which CCC have already adopted as the guiding principal in their Corporate Plan.

8. Balancing Heritage and Growth. In a Historic Cathedral City like Canterbury we have some of the “exceptional circumstances” that the Housing and Planning Minister referred to in his recent statement. These include local demographics, including a very high student population, a World Heritage Site, the landscape quality of the setting of the City and the need to protect the heritage and character of the Historic Cathedral City.

In September 2022 Historic England funded a research project on **Achieving a Better Balance between Heritage and Growth in Historic Towns and Cathedral Cities**. Canterbury was one of the 12 Cities that took part in the project.

This report explains why historic cathedral cities like Canterbury need to be considered as “exceptions” as announced by the Minister for Housing Planning and Building Safety on 23rd January 2024. Copies of this report are attached.

VALUE OF SURROUNDING COUNTRYSIDE

A ‘Key Diagram’ published by Canterbury City Council is a map of the District, on which most of the non-urban area is designated as National Landscape, International Wildlife Site, National Nature Reserve, Site of Specific Scientific Interest, or Area of High Landscape Value. **However, even those areas not covered by a designation are of high value, in creating a green envelope for the historic city, in maintaining corridors for wildlife, and as much-needed sources of food.** We commend the Council for removing from the latest draft of the Local Plan the large development sites to the east of the City towards Littlebourne and Bekesbourne (which were put in to help pay for the now rejected Eastern By-Pass). **However, the addition of a development site for 2000 houses between Blean and Tyler Hill almost matches those withdrawn sites in its negative impact on the countryside and the sustainability of the Plan.** Whereas we need to allow for natural growth of the population of the District, every effort should be made to accommodate the commensurate growth in housing on brownfield land.

Traffic and Transport

Large numbers of people have to enter or traverse urban Canterbury every day: employees, shoppers, visitors, schoolchildren and students people in need of healthcare, people providing services such as plumbers and carers, and drivers of delivery vehicles. To get from one side of the urban area to the other the only routes are either along the A28/ring-road to the south, or along St Stephen's Road/North Lane/St Peter's Place to the north. In 2019 KCC as Highways Authority commissioned a report(the Sweco report) which found that the road network in urban Canterbury was '**at or near capacity**' and that, with the development already planned '**doing nothing is not an option**'

Since the 2019 Report space for a further 22,000 housing units by 2040 is being proposed in the new draft Local Plan, a great deal of it in the vicinity of the City of Canterbury. **This is another reason for the Council to reduce the number of housing units in the Local Plan. Any addition to the number of houses actually needed will increase without any justification the number of vehicles using the road network, and contribute to gridlock, and increasing harm to health caused by air pollution.**

Even building the 806 of houses identified in the Housing Needs Assessment will require significant investment in measures to prevent ensuing growth in private car journeys that would cause the major problems above. We commend the Council for the aspiration expressed in the draft Transport Strategy that accompanies the draft Local Plan. It presents a vision of integrated public transport, with hopper buses connecting all parts of the city, and reallocation of road space to buses and bicycles, and replacement of roundabouts with signalised crossings that are friendly to cyclists and pedestrians. However, this is not a carefully costed strategy, and in addition most of the interventions are set to be funded by developer contributions and therefore vulnerable to the well-known plea by developers that such contributions would make their developments financially unviable. It is therefore vital that the number of housing units in the Local Plan is kept down to a figure which matches the need.

Does This Local Plan Work For Our Residents

We would draw Members attention to the Canterbury Labour Councilors Document “Does this Local Plan Work for Our Residents (2022) which addressed many of the issues in the previous Draft Local Plan and concluded:

“We believe that this Council should take time to recalculate the housing numbers in light of possible Government changes to the relevant legislation, before finalizing the plan for submission.”

A copy of this document is attached for reference.

Recommendations

- 1. We urge CCC to review its approach to the current Local Plan Review and revert to their own Housing Needs Assessment Report as its housing target rather than the pursuit of unsustainable growth unsuited to the needs and character of the City and District and which does nothing to resolve the problems of housing affordability and the provision of social housing for rent and shared ownership.**
- 2. Members should ask Officers in the Local Plan Team to provide a written report as part of DLP consultation process setting out in detail the reasons why they maintain that the broader definition of exceptional circumstances referred to by the Minister for Housing, Planning and Building Safety does not apply to Canterbury.**