

A New Approach to the Local Plan for Canterbury District

A Vision for Sustainable Planning by 2030



CCAP
Canterbury
Climate
Action
Partnership



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ISSUES AND VISION: A LOCAL PLAN LED BY CLIMATE ACTION, SUSTAINABLE DEVELOPMENT AND COVID-19 RECOVERY

‘COVID19 has exposed the fragility of our societies to global shocks, such as disease or the climate crisis...let us use the pandemic recovery to provide a foundation for a safe, healthy inclusive and more resilient world for all people.’

Antonio Guterres, UN Secretary-General 28 April 2020

CHALLENGES AND OPPORTUNITIES

In line with the 2019 Local Development Scheme, Canterbury City Council (CCC) is proceeding with the revision of its 2017 Canterbury District Local Plan. This process entails community and public consultations according to the 2019 Statement of Community Involvement. As CCAP represents a wide range of key local stakeholders in the District, including residents’ organisations, civil society, business (through BID), the universities, and others, it wishes to contribute to the formulation of the Local Plan from an early stage, starting with the initial Survey of Issues and the drafting of the Local Plan’s overall Vision.

In 2019 the UK Government amended the Climate Change Act 2008 committing the UK to legally binding targets of net zero emissions by 2050. The same time, CCC declared a climate emergency, and CCAP has been closely engaging with CCC and Kent County Council (KCC – ref. the Kent and Medway Energy and Low Emissions Policy and the SE region TRI-LEP Energy Strategy). Our aim is to inform our public, contribute to local strategies and to support community-level projects with a view to reaching Zero Carbon emissions in the District, ideally by 2030. CCAP has worked closely with the Canterbury Sustainable Development Goal (SDG) Forum to submit a report on implementation of the SDGs in Canterbury District to the UK Government for the 2019 review of SDG implementation to the United Nations.¹

The Covid-19 pandemic has involved major efforts by our NHS, local government, local organisations and residents. This has absorbed massive resources and created new financial issues which will continue into the immediate future. Looking to the Covid Recovery in 2021 and beyond, the District will be faced with considerable challenges regarding the economic and employment impact of the crisis. But there will also be opportunities, notably in respect of addressing sustainability and climate action through green strategies. These will directly affect the formulation of the Local Plan, the Strategic Environmental Assessment, the Sustainability Appraisal and the Habitat Regulations. It can no longer be ‘business as usual.’

¹ Further information is available at www.ccap.org.uk and Facebook pages *Canterbury Climate Action Partnership* and *Canterbury SDG Forum*.



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In identifying the Issues impacting on the new Local Plan, its Vision and substantive content, our community is faced with unprecedented challenges as well as opportunities. The Plan must address the climate emergency, ensure implementation of sustainable development, and promote a successful Covid Recovery. In this endeavour, it is vital that the whole community is fully engaged and supportive, building on the close relationships and interaction achieved during the Covid-19 crisis. CCAP will continue to work with CCC and KCC in the achievement of these key objectives, providing advice and relevant expertise. CCAP is able to draw on local government and community experiences, not only from the UK, but also from international bodies which have been at the forefront of formulating responses to climate action, sustainability and Covid Recovery.²

ISSUES AND VISION

In line with CCC's declaration of Climate Emergency, we must develop a new Local Plan for the District that rises to the immense challenge of reducing the causes of, and planning for, the effects of climate change. The new Local Plan of 2021 will need to be environment, infrastructure and people-led in order to bring the community along with us in reducing emissions, repairing the environment and developing resilience to climate change.

There is a new imperative to all local, regional and national planning, addressing the causes and effects of climate change in line with the obligations set out in the 2016 Paris Agreement on Climate Change. Although the International Panel on Climate Change, SR15 Report states clearly that our emissions must be at least halved by 2030, there is evidence that this is not soon enough. The Tyndall Centre has set carbon budget commitments for Canterbury District and these anticipate a reduction in our emissions by 50% by 2025. This presents an enormous challenge for the reform of our district and we urgently need a Local Plan than puts this imperative at the top of the agenda.

Climate action is embodied in SDG 13 of the UN 2030 Agenda for Sustainable Development but it cuts across many of the other goals, such as SDG 7 on affordable and clean energy, SDG 8 on decent work and economic growth, SDG 11 on sustainable cities and communities, and SDG 12 on responsible consumption and production. Many of these SDGs and their specific targets for 2030 relate to existing legal competencies of CCC and KCC and the work of local institutions and civil society. The Local Plan and other strategic plans should be accompanied by a 'Voluntary Local Review' on SDG implementation as carried out by Bristol City Council and many local councils overseas.

² e.g. Commonwealth Local Government Forum (CLGF), www.clgf.org.uk, Local Governments for Sustainability (ICLEI) www.iclei.org, United Cities and Local Governments (UCLG), www.uclg.org and the OECD which has recently published *A Territorial Approach to the SDGs* <https://doi.org/10.1787/23069341> (2020)



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Our new Local Plan must be formulated in light of the enormous challenges facing local government, national government and the international community in the post Covid-19 recovery period. These may seem daunting, not least in restoring jobs and prosperity, where Canterbury is likely to be hit by income and job loss through drastic decline in tourism and student numbers. However, as UN Secretary-General Antonio Guterres has said, there will also be opportunities in adopting a green strategy to economic recovery. Indeed, local government working with business through BID and other partners will have a key role in sustainable economic recovery. Such a recovery should entail local economic development strategies aiming to create jobs through adopting Green Policies. It will need to be pursued both through the Local Plan and in harmony with the wider Kent renewal strategies being coordinated at county level.

Covid-19 has resulted in reduction in air pollution, it has encouraged home working, greater attention to local food supplies, and more focus on recycling, green spaces and our natural environment. Above all it has shown the importance of neighbours and communities cooperating, and of vital public services, not only in health, but many other areas where local government has a direct responsibility. These are opportunities which need to be built upon.³

A STEP CHANGE IN APPROACH TO LOCAL PLANNING

There must be a re-focussing of carbon action from the margins of the Local Plan placing 5-year carbon budgets at its core. The traditional view of 'development' must be re-thought so that we focus more on our existing buildings, infrastructure and environment, rather than new development.

The highest priority is the rapid decarbonisation of the existing district housing and commercial property, and of our transport and energy infrastructures, in order to reach net zero emissions targets.

If we continue to follow the guidance set out in the National Planning Policy Framework (NPPF) we will fail to deliver a Local Plan that addresses climate action in anything like the scale and urgency required.⁴

This existing approach has hitherto prioritised new development over Climate Action because the economic imperative of 'now' has always trumped the climate impact of 'some point in the future'. However, the climate situation has reached the point where the only development that should be permitted is that which achieves a net zero or better carbon footprint. In this respect, reference should be made to the

³ A number of cities such as Brussels, London and Milan have announced their intention to instigate more pedestrianisation and cycle lanes as part of a Covid Recovery strategy.

⁴ A range of overseas governments, as well as the European Commission are providing grants and other financial assistance to the private sector for Covid recovery on the condition that they agree to carbon-reduction or other specified climate actions, particularly in the case of those businesses with an existing heavy carbon footprint.



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published papers by the CCAP Building Group and the Canterbury Alliance for Sustainable Transport (CAST), a CCAP partner.⁵

The new way of developing the Local Plan must have clear foundations in carbon budget planning and sustainability, summarised in the following table:

Old way of developing a Local Plan	The new way of developing the Local Plan
<i>Local Plans must:</i>	<i>The New Local Plan must:</i>
Plan positively for the development and infrastructure required to meet the objectives, principles and policies of the National Planning Policy Framework.	Plan for how to reform and adjust the existing infrastructure in order to transform the district to net zero carbon operation.
Be drawn up over an appropriate time scale, preferably a 15-year time horizon, taking account of longer-term requirements, and kept up to date.	Be drawn up in 5-year carbon budgets that will deliver emissions reductions to meet each budget.
Indicate broad locations for strategic development on a key diagram and land use designations (e.g. nature reserves) on a proposals map.	Indicate all the areas of the District that can be used for ecological restoration and wilding, carbon sinks, tree growing, renewable energy generation and community growing.
Allocate sites to promote development and other uses of land, providing detail on form, scale, access, and the amount of development where appropriate.	Show prioritised zones of the district for massive emissions reduction work to reduce operational emissions to net zero and improve the social and environmental sustainability.
Identify areas where it may be necessary to limit freedom to change the uses of buildings.	Rezone the district to enable the co-localisation of work and habitation to reduce transport and distribution.
Identify land to protect from development, e.g. because of its environmental or historic value.	Identify and increase land for environmental regeneration and community use.
Contain a clear strategy for the environmental enhancement of the area.	Have a clear strategy for ensuring that any new development aims at net zero carbon
Promote local economic development and growth including tourism	Ensure that post Covid-19 local economic development and growth including job-creation is in line with green strategies and climate goals and that tourism is of a sustainable nature
No reference to international obligations or 2019 Climate Change Act 2008 (2050 Target Amendment) Order.	Reference to 2019 UK Climate change Act, 2016 Paris Agreement and subsequent IPCC targets, the 2030 Agenda for Sustainable Development and SDG targets and preparation of an accompanying Voluntary Local Review on SDG implementation

⁵ CCAP Building Group paper 'Zero Carbon Buildings', June 2020 and CAST paper 'A Vision for 2030 and How to Travel There', April 2020



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BUT ISN'T THIS JUST TOO HARD TO ACHIEVE?

Yes, it is hard to achieve, but it is THE challenge for our generation and if we fail to act, the consequences are beyond imagination. This should be the lesson from the Covid-19 emergency which can ultimately be overcome, but once climate change reaches a critical tipping point, it may not be possible to reverse it.

BUT WHAT ABOUT ECONOMIC DEVELOPMENT?

As already stated, following our experiences with Covid-19, it will be crucial to get the economy up and running again as soon as possible. But it is also vital that economic development should not return to 'business as usual'. We need a new economic model that embraces a recovery strategy that simultaneously boosts the economy while tackling the climate crisis and reducing inequality. This is why we need the adoption of what has been called a 'Green New Deal' involving **Green Policies based on global targets and international best practices**.

Such **Green Policies** include:

- A sweeping green investment programme at the heart of government economic policy
- Making billions of pounds available for a Green Transformation Fund
- The creation of 'green collar jobs'; a 'carbon army' of workers and apprenticeships
- A massive investment in renewable energy
- Making low-cost capital available for green businesses
- Building an alliance between environmentalists, industry, agriculture and trades unions to put the interests of the green economy foremost
- Ensuring that all buildings are energy-efficient
- Ensuring more realistic fossil fuel prices that include the cost to the environment
- A windfall tax on oil and gas companies

The UK remains highly centralised compared to most other countries. The Local Government Association and UK Executive Mayors have argued that the lessons of Covid-19 have demonstrated both the need and the ability for local government to have more powers and financial means. This was shown by the extraordinary allocation of £3.32 billion to local government by Whitehall, although even this did not cover all local needs. In the current circumstances almost all the measures outlined above will need central Government to act. CCAP and other like-minded organisations need to lobby central government to put **Green Policies** foremost in its plan to revive our ailing economy and to reinforce the need to maintain and grow the green economy until the UK reaches zero carbon and beyond. In this we can draw on extensive and growing experience and expertise.

We further need to join with local government to insist that central government decentralise appropriate powers, including financial, to our democratically elected local bodies to allow them to promote the Green



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Economy locally. Even without immediate decentralisation, we need to call on CCC and KCC to ensure that the green economy is a central plank in all its policies and spending plans and that they do everything possible to support local green business, working with BID and other local bodies.

BUT SURELY THIS WILL NOT COMPLY WITH THE NPPF?

The National Planning Policy Framework (NPPF) presumes in favour of Sustainable Development but also includes a clause that states that ‘any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards (which are currently inadequate to tackle the climate emergency)’. Developers often quote variance with national standards when mounting legal challenges to planning policies, conditions or decisions.

However, within the NPPF, there are some positive clauses on which Canterbury can build a case for denying inappropriate development and for setting zero carbon requirements and planning conditions for all new buildings. These include the stipulation that *‘planning authorities should consider whether unacceptable development could be made acceptable through the use of conditions or planning obligations.’*

To get true zero carbon Sustainable Development where new development is absolutely needed, it will be necessary for CCC and KCC, through the Local Government Association to campaign to change the Government’s national technical standards. At the same time, we can work with other like-minded councils, such as Bristol, and cities and partner councils overseas, in setting radical new zero carbon policies and planning conditions in our revised Local Plan.



RECOMMENDATIONS

It is no longer realistic to return to ‘business as usual’ and Canterbury can take advantage of the changed public mindset resulting from the Covid-19 crisis to develop a new vision for the Local Plan addressing Climate Change and Sustainability.⁶

Specifically, it is the view of CCAP that the Local Plan should:

- **Be environment, climate and people-led and focus on improving our buildings, infrastructure, and environment.**
- **Contain 5-year carbon budgets with clear carbon reduction plans.**
- **Ensure new development, including housing, is zero carbon in use.**
- **Encourage local economic development that creates green jobs/investment and sustainable tourism in close cooperation with BID.**
- **Tackle air pollution by creating low emission zones and providing viable alternatives to private car use, including cycling lanes.**
- **Establish more green spaces/corridors and areas of ecological restoration and community use.**
- **Rethink how businesses and homes are located to encourage home working and to reduce commuting.**
- **Identify sites for renewable energy.**
- **Be accompanied by a Voluntary Local Review of SDG implementation.**

The Climate Emergency will not go away: Canterbury can emerge as a national and international leader in addressing these issues if it follows the policies outlined.⁷

CCAP and its partner organisations stand ready to work with CCC, as well as KCC, to help identify and formulate the Issues, a new Vision, and to provide expert advice.

⁶ A recent KCC survey undertaken with Hampshire and Hertfordshire showed that as a result of Covid-19 in the next 12 months 47% of respondents stated that they expect more locally produced food, 42% would reduce their use of single use plastic and 20% would use their car less by using more active forms of travel.

⁷ The 2019 UCLG GOLD V report, dealing with SDG implementation referenced the work taking place in Canterbury on climate emergency; <https://www.gold.uclg.org/reports/other/gold-v-report>