

Canterbury Climate Action Partnership (CCAP) response to The Draft Canterbury District Local Plan to 2045

CCAP is a Community Interest Company, formally recognised by the UN Framework Convention on Climate Change (UNFCCC). CCAP is the umbrella organisation across the Canterbury District for organisations concerned with climate action, including residents associations, community and faith groups, businesses, schools and universities. It is represented on the City Council's Climate Action Partnership Board, and cooperates with CCC and KCC in finding joint solutions to the climate and ecological emergencies. Our response to the Draft Local Plan is undertaken in this spirit of ongoing cooperation, has drawn on relevant work undertaken by CCAP partners, and has the formal endorsement of the CCAP Board.

This response to the Draft Canterbury District Local Plan is based on the foundational issue detailed in the **Climate Change Topic Paper** (CDLP2045-CC01):

'The next 23 year period of time covered by the Canterbury District Local Plan 2045 has been highlighted internationally as a critical moment in human history: acting on the causes of climate change is crucial to minimise the risk of long term climate change instability and the worst impact of a changing climate. At the same time, parallel work to repair and restore resilient ecosystems and adapt to the changing climate must also be undertaken to reduce the impacts of climate and ecological change that are already underway.' (p.4)

As such, we frame the response around the policies in the Draft Local Plan that are directly related to

- repairing and restoring resilient ecosystems
- adapting to the changing climate

The Local Plan must formally acknowledge its alignment with the global targets on climate and biodiversity to which the UK Government is party to, as set out at the UN COP27 (2022) and the UN Biodiversity COP15 (2022). Likewise, given that certain key planning and other competencies affecting the district are the responsibility of Kent County Council and the UK Government, it is vital that the Local Plan ensures that decisions taken in Maidstone or Whitehall are fully compatible with local community needs. An example is the negative impact on the district's own climate goals, environmental safeguards and noise pollution targets posed by the proposed development of **Manston Airport** in Thanet, which we oppose.

This response does not address each policy within the Draft Local Plan. This is firstly to focus on issues concerning the two prime concerns indicated above, secondly for space limitation, and thirdly (and importantly) because many share a common underlying concern:

*Ambitions to achieving targets towards decarbonisation and ecosystem restoration are significantly challenged by **housing targets**.*

HOUSING TARGETS

We addressed in detail in our response to the 2021 consultation¹ that the plans to increase housing numbers in order to access developer contributions in order to (attempt to) alleviate increased traffic (particularly from the increased housing) are unreasonable and unsustainable. Adding to the problem in order to solve the problem is not a solution.

¹ <https://www.ccap.org.uk/response-to-local-plan-consultation/>

In particular, we are concerned that the consultation responses of 2021, concerning housing targets connected with the Preferred Option, have been insufficiently addressed in the Draft Local Plan. The **Consultation and Engagement Topic Paper** details the overwhelming objection in 2021 to the 'Preferred Option' of 14,000-17,000 new dwellings between 2020 and 2040: 'Preferred option [C]: 10.3% agree, 66.8% disagree. Canterbury Focus B: 8.6% agree, 65.8% disagree.' (p.6) In response, it states that: 'The draft Local Plan sets out development allocations to meet that need in full between 2020 and 2045 but does not propose higher levels than the minimum number set by the government' (p.6).

Policy SS3 – Development Strategy for the District indicates 'An average of 1,252 new dwellings per year' (p.13) for the District. This amounts to 31,300 new dwellings over the 25-year period (which has already begun). **Preferred Strategic Growth Local Plan Option** shows a similar planned increase in households between 2019 and 2045 of **27,699** (p.30).

The development strategy set out by the Canterbury District draft Local Plan to 2045 is to increase the number of households in the district by **40%**. This is excessive and unsustainable.

By extending the Local Plan period from 2040 to 2045, the annual targets have been reduced, whilst the overall target remains at that set by the rejected Preferred Option of 2021. This is not a reduction, and is not a fair response to the consultation. In light of the promises that CCC is '100% in listening mode,' and 'open to alternative suggestions that have a realistic chance of solving the district's challenges,'² it is expected that these 2021 consultation responses are considered with the attention they deserve, and that the total, rather than the annual, housing target are significantly reduced.

We urge CCC to adapt policies instead in accordance with the **Housing Needs Assessment** undertaken by Edge Analytics in September 2021, which recommends a baseline of 806 households per year for the District, itself a high target.³

Summary of Options Carbon Emissions CDLP2040-CC06 makes clear (fig.1 p.1) that 'year on year emissions from constructing new development and transport infrastructure (embodied emissions) plus the operational emissions from heating and powering the new buildings (operational emissions) evolve over the period of the plan.' The summary is unequivocal: greater housing = greater emissions. This is unavoidable, as housing is evidently required. It is, however, the scale and location of development that is of concern here.

The **Spatial Strategy for the District**, in the Draft Local Plan, explains that 'These levels of growth will undoubtedly place pressure on existing infrastructure, such as our roads, schools and water supply and, with limited "brownfield" or previously developed land available, will necessitate further development on agricultural land' (p.5). Growth in one limited sense (economic growth for some) is being therefore prioritised above environmental, ecological and social concerns. We question this baseline.

Similarly, **Climate Change, Carbon Emissions & Air Quality Strategic Overview CDLP2040-CC01** details the importance of land for carbon sequestration, and that 'each year the district land removes about 1/20th of the carbon dioxide generated from district energy consumption' (p.17). In addition, therefore, to the increased emissions of construction and materials, the destruction of agricultural land and its precious soils will remove a vital natural carbon sink and decrease the district's capacity for emissions absorption.

Increasing housing beyond the recommended baseline will increase emissions to the extent that makes the proposals incompatible with the Council's pledges to cut emissions and achieve net zero by 2030, as indicated both

² <https://news.canterbury.gov.uk/news/main-item/cabinet-urges-public-to-have-its-say-on-draft-planning-blueprint/>

³ <https://www.local.gov.uk/sites/default/files/documents/Housing%20Needs%20Assessment%20%28September%202021%29%20%281%29%20%281%29.pdf>

in the **Declaration of a Climate Emergency** of 18th July, 2019,⁴ and the **Canterbury City Council Climate Change Action Plan 2020-2030**.⁵

This is important: by pursuing the excessive house-building and subsequent road-building, the Council would fail to honour its own commitments to cut emissions.

In addition, a key SA Objective of the **Sustainability Appraisal Report** is ‘Avoid the unnecessary loss of best and most versatile agricultural land’ (11.2 p.6). This is of particular concern with increased food insecurity given climate and geopolitical pressures, and in light of the Government Food Strategy of June 2022,⁶ which calls for greater protection of farmland for domestic food production. Furthermore, when set alongside the catastrophic loss of farmland in neighbouring authorities, such as Ashford Borough Council, Swale Borough Council, Folkestone & Hythe District Council, Dover District Council, and Thanet District Council, it is incumbent on CCC to seek to preserve what little agricultural land is left in East Kent.

We urge the City Council to respond constructively to the proposed amendment to policy NC21 of the **Levelling-up and Regeneration Bill**, tabled by Theresa Villiers MP in November 2022, which ‘requires a revised NPPF within six months to provide that housing targets are advisory⁷ and not mandatory.

We also urge the City Council to respond constructively to Secretary of State for Levelling Up, Housing and Communities, Michael Gove MP, in his pledge that housing targets should be ‘an advisory starting point, a guide that is not mandatory,’ and that ‘It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area – be that our precious Green Belt or national parks, the character or an area, or heritage assets.’⁸

Furthermore, the Secretary of State offers ‘transitional arrangements’ of two years, which should be accepted by CCC in order to revise the excessive housing figures.⁹ This period of grace would also allow CCC to adapt to the forthcoming amendments to the NPPF, and thus to comply with the most up-to-date government policy, and to respond meaningfully to the consultation responses.

Many of the more controversial and unsustainable issues of the District Local Plan would be ameliorated by this fundamental shift in housing targets.

POSITIVE PROPOSALS

Strategic Objectives for the district, as outlined on p.7 of the Draft Local Plan.

Policy SS1 – Environmental Strategy for the district, in particular the provision of new open spaces, the protection of habitats and valued landscapes, the full recovery of the Stodmarsh Nature Reserve, the delivery of 20% biodiversity net gain, 20% tree and hedgerow cover for new development across the district, and the promotion of the Stour Valley Regional Park.

⁴ <https://democracy.canterbury.gov.uk/documents/g12133/Printed%20minutes%2018th-Jul-2019%2019.00%20Council.pdf?T=1>

⁵ <https://democracy.canterbury.gov.uk/documents/s110788/Appendix%201%20Climate%20Change%20Action%20Plan>

⁶ <https://www.gov.uk/government/publications/government-food-strategy/government-food-strategy>

⁷ https://publications.parliament.uk/pa/bills/cbill/58-03/0169/amend/levelling_up_rep_rm_1115.pdf

⁸ <https://questions-statements.parliament.uk/written-statements/detail/2022-12-06/hlws405>

⁹ ‘Where authorities are well-advanced in producing a new plan, but the constraints which I have outlined mean that the amount of land to be released needs to be reassessed, I will give those places a two year period to revise their plan against the changes we propose and to get it adopted.’

Policy SS2 – Sustainable Design Strategy for the district, in particular, that ‘new development should be designed to achieve Net Zero operational carbon emissions, should make efficient use of land and should be designed to maximise energy and water efficiency.’

All the policies of **Policy DS6 – Sustainable Design**, which are excellent ambitions, in particular, that ‘New development shall be designed to achieve a recognised calculated Net Zero operational carbon emissions standard such as those set by Passivhaus, Standard Assessment Procedure (SAP) and BREEAM.’

Policy DS13 – Movement Hierarchy. This inverse pyramid, which prioritises active travel and public transport whilst deprioritising private vehicles, is an admirable policy proposal.

Policy DS14 – Active and Sustainable Travel. Another excellent policy proposal.

Policy DS18 – Habitats and Landscapes of National Importance and **Policy DS19 – Habitats, Landscapes and Sites of Local Importance**. Both these policies are excellent, granting protection to local and national sites of importance.

Policy DS22 – Landscape Character. The important and rigorous conditions must be matched prior to the granting of planning permission. In particular, Clause 3, which states that ‘Proposals for development which would cause significant harm to the landscape character of an area will be refused.’ This policy must be rigorously enforced in close consultation with local communities and parish councils.

Policy DM17 – Noise Pollution and Tranquility and **Policy DM18 – Light Pollution and Dark Skies**. This latter is an excellent initiative, especially following the proliferation of sports pitch floodlights surrounding the city.

The **Canterbury District Tree & Woodland Strategy 2022 – 2045**, is admirable. We urge CCC to follow the first core principle of the Strategy: ‘Protecting existing trees and woodlands,’ and to prioritise tree, woodland and hedgerow *preservation* as grounds for not pursuing development rather than tree-planting or hedgerow planting as *mitigation* for development. It is also vital to consider the third core principle, that in addition to precious and valuable habitat and wildlife refugia, trees, hedgerows and woodland constitute valuable natural carbon capture. It is worth emphasising that as trees grow to maturity, they capture carbon at an exponentially increasing rate. In addition, mature trees, such as oak, can increase their rate of photosynthesis by up to a third in response to raised CO₂ levels.¹⁰ Therefore the loss of a mature tree cannot be appropriately compensated by the planting of numerous saplings, and consequently mature trees, woodlands and hedgerows must be protected at all costs.

AREAS OF CONCERN:

Policy SS4 – Movement and Transportation Strategy for the District. The emphasis on sustainable transport is vital, especially the improvement of walking and cycling infrastructure, and investment in public transport. This is well reflected in the inverse pyramid of **Policy DS13 – Movement Hierarchy**.

However, the delivery of these policies is contingent upon a) increased housing for securing developer contributions, and b) the Eastern Movement Corridor (bypass). This is evidently problematic. Increased housing will result in increased private car use, even with provision of active travel as conditions of development. Building new roads encourages more traffic, and comes at a massive environmental cost. Special attention needs to be given to restoring public transport to rural communities which experienced withdrawal of bus routes in 2022.

CDLP2040-CC01 Climate Change, Carbon Emissions and Air Quality Strategic Overview makes the following recommendation for the city council and other public service providers:

¹⁰ <https://academic.oup.com/treephys/article/42/1/130/6326847?guestAccessKey=cc4b32f0-c8ca-4507-928b-59398a211fac&login=true>

“● *Seek extra investment for public and community transport (e.g. increased routes, frequency, through ticketing etc) and for significant infrastructure that supports a modal shift to walking and cycling.*

● *Consider measures to dampen demand for private car transport, e.g. increasing parking charges, road user charging, introduction of workplace parking levies etc. [...]*

● *Run additional campaigns to champion public transport and active travel.*

● *Incentives low emissions car-sharing schemes. [...]*

The local plan must prioritise transport policy and options that resource the necessary actions to facilitate transition to a net zero transport system.” (pp.12-13)

Why are these proposals not already being pursued? We urge Canterbury City Council to follow these recommendations *with immediate effect*, to invest in active travel and sustainable transport as *first priority*, to work with KCC and bus companies to invest in public transport *as a matter of urgency*, and to withdraw from the Local Plan **Policy C16 – Canterbury Eastern Movement Corridor**.

Policy C16 – Canterbury Eastern Movement Corridor

This bypass would constitute a significant negative ecological impact. It is our assessment that it should not be built and that it should be withdrawn from the Local Plan.

- It would encourage greater car usage. See **Appendix F: Appraisal of the Preferred Option Spatial Strategy**: ‘This may relieve some air quality issues within Canterbury City Centre itself but may encourage greater car use’ (p.2). See also **Appendix H: Appraisal of Spatial Strategy Policies** ‘new road infrastructure, including a movement corridor to connect the A28 at Sturry with the A2 at Bridge, is proposed which is likely to result in increased car use in these locations’ (p.2). See also **Sustainability Appraisal Report**, 5.8.20, p.80.
- It would greatly increase carbon emissions. See **Appendix F: Appraisal of the Preferred Option Spatial Strategy**: ‘The delivery of new road links [...] would also add to the embodied carbon required to deliver the spatial strategy’ (p.4).
- It would run through parts of Trenley Park Wood, designated as Ancient Woodland and important habitat link in the **Canterbury District Tree & Woodland Strategy 2022 – 2045**. Trenley Park is also outlined as ancient woodland in the **Landscape Character & Biodiversity Appraisal**, which highlights the historic and heritage value of this woodland: ‘the oldest documented deer park in Kent, as well as one of the oldest in the country. It was created by Odo of Bayeux and was first mentioned in a charter dating 1071-82 and is one of two deer parks in Kent mentioned in Domesday Book’ (p.226).
Ancient woodlands are designated as ‘irreplaceable habitats’ in the NPPF.
The Landscape Character & Biodiversity Appraisal celebrates Trenley Park Wood’s ‘sense of remoteness along the routes afforded by woodland enclosure’ (p.226) and the ‘areas of tranquillity’ (p.227) It labels Trenley Park Wood a ‘valuable and priority habitat’ that should have ‘buffers to protect and enhance habitats’ (192). The overall aims of the report concerning Trenley Park are ‘To protect and enhance woodland habitat, which forms part of the wider habitat network within the Lower Stour Wetlands BOA’ (228).
These recommendations are clearly incompatible with plans for a new road. There is no way the road can be reconciled with this report.
- It would cut through Moat Rough and Sandpit Wood, woodlands that were already well established in the mid 19th century, as indicated on the KCC Heritage Map.¹¹
- It would destroy a key buffer of the SSSI of Old Park & Chequers Wood. The integrity of SSSIs is guaranteed by the creation and preservation of buffer zones and corridors adjacent to the designated area. To build a road so close to the SSSI would greatly impact its integrity and its capacity to provide essential habitat for protected

¹¹ <https://webapps.kent.gov.uk/KCC.HeritageMaps.Web.Sites.Public/Default.aspx>

species (especially Nightingales and Turtle Doves). Buffers and corridors are articulated in the Lawton Principles, embedded nationally within the **Natural Environment White Paper** and the **Biodiversity 2020 Strategy**.

- The **NPPF** guidance for Preparing and Reviewing Plans advises LPAs that ‘Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued’ (p.11). No alternative options to road building for reducing city traffic have been presented. No options have been explored or consulted on. The Eastern Bypass was never appraised (or even mentioned) in the 2021 Sustainability Appraisal. As such, the public were denied the opportunity to scrutinise the plans in the initial stages of consultation, and have been given no alternatives to consider.
- The **NPPF** Section 9 is devoted to Promoting Sustainable Transport, with clear guidance on improving local transport networks, cycling and walking. As mentioned above, these ‘modal shift’ options are presented as contingent upon the Canterbury Circulation Plan, which includes the Eastern Movement Corridor. Sustainable transport must be prioritised and pursued instead of impactful road infrastructure.
- **NPPF** Section 13 provides protection for Green Belt land: ‘Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.’ (43)
- **NPPF** Section 16 describes conserving and enhancing the historic environment. The **Landscape Character & Biodiversity Appraisal** details the many important heritage features to be found in multiple sites along the route of the Eastern Movement Corridor, in particular those of the Middle Acheulian associated with *Homo Neanderthalensis* and *Homo Heidelbergensis* at the Fordwich Pit and the Sturry Pit. This is ancient archaeology of global significance.
- **NPPF** Section 15. Conserving and enhancing the natural environment, and conserving Habitats & Biodiversity. This further reinforces the reasons against building a road adjacent to the SSSI.
- The Eastern Movement Corridor would mirror the ongoing controversy of the Norwich Wensum Link, currently estimated as costing £251m and diverting vital Council monies from other services, currently challenged by Judicial Review, and bringing significant negative attention to the District Council.

The **Transport Topic Paper** opens with the bold lines: ‘It is acknowledged nationally and across the district that congestion and pollution will continue to rise to exacerbate the climate crisis without radical steps to come up with an alternative solution’ (p.1) There are, certainly, many visionary and radical aspects to the Local Plan proposals. The Eastern Movement Corridor is not radical. It attempts to solve the problem of city congestion by offloading the problem elsewhere, and in so doing creating an ecological, cultural, social and economic catastrophe.

We support and strongly recommend the **Old Park & Chequers Wood Common Position**¹² presented to CCC Overview & Scrutiny Committee on Wednesday 14th December 2022. This proposal would extend the SSSI to cover the whole of Old Park, Chequers Wood and the Golf Course, to increase the buffering, to prevent all development within and adjacent to its designation, and to improve connectivity with other core habitats. The overall integrity of the Old Park & Chequers Wood is vital to the future sustainability of the District.

Policy C15 – Canterbury Golf Course. Concordant with the protection of the SSSI of Old Park & Chequers Wood, we call upon CCC to withdraw the plans for mixed used development at Canterbury Golf Course. In addition to all other considerations detailed above, this site abuts the breeding and nesting habitat of the turtle doves, whose tiny and vulnerable population would be severely disrupted by development on this site.

Policy C26 – Land north of University of Kent. The Northern Land Holdings of the University of Kent, submitted in the **2020 Call for Sites**, have not been allocated. These lands should therefore be withdrawn from the Local Plan. Any major housing development in those areas would constitute a loss of prime agricultural land, a negative impact on the rural character of Blean and Tyler Hill, and an additional loss of green space, landscape, habitats and ecosystems. Furthermore, a future **Northern Movement Corridor** would come at an unacceptable and significant

¹² <https://us14.campaign-archive.com/?u=040ece4d6fc7cf93ba6a2305a&id=30008b3868>

negative impact. With no sustainability appraisal of such a huge proposal, and consequently no opportunity to consult on it, we recommend that **Policy C26** be withdrawn.

Policy SS2 – Sustainable Design Strategy – whilst supporting this policy (see above) we seek clarification on how these objectives will be achieved, whether planning permission will be refused if these conditions are not built in to the application, and what level of scrutiny will ensure developments conform to net zero carbon.

Policy SS4 – Movement and Transportation Strategy for the District. The Canterbury Circulation Plan (CCP). This whole vision is based on the questionable premise that the means to solve a traffic problem is to re-route traffic elsewhere. New roads generate more traffic. This is called Induced Demand, defined by the **Department for Transport Evidence Review** as ‘the increment in new vehicle traffic that would not have occurred without the improvement of the network capacity.’¹³ This is clearly identified in the Local Plan **Sustainability Appraisal Report**, that whilst potentially reducing city-centre traffic, the Eastern Movement Corridor ‘would also likely increase vehicle use outside the city centre’ (p.80).

Even the reduction of city-centre traffic is not guaranteed. The summary of the DfT Evidence Review is clear: ‘network improvements stimulates additional traffic and this additional traffic affects travel conditions, *partially re-congesting the network*.’¹⁴ The case of Newbury and the A34 is relevant here.¹⁵ In the case of Canterbury, these factors would be compounded by increased traffic caused by the increased housing built in order to secure funding to build the roads to reduce the traffic.

The CCP is likewise predicated on the upgrade of Rough Common Road, the details of which are laid out in the **Transport Topic Paper**. This is neither viable nor sustainable. It would cut the community in two, increase congestion, noise, pollution and accident hazard. It would deposit traffic on the Whitstable Road with no ease of access to the city centre, increasing congestion on an already congested road. Traffic modelling in the **Jacobs Kent Countywide Model Forecast Report** is confusing, and appears to show no advantage of this ‘western artificial bypass.’ The negative impacts far outweigh whatever positive impacts might be presented.

Policy DS21 – Supporting biodiversity recovery. Too much emphasis is placed on mitigation of habitat and biodiversity loss and ecological degradation and fragmentation over prevention, even with 20% BNG. This is evident with the priority of the Eastern Movement Corridor over any alternative measures to reduce traffic in the city centre. There should be active support for rewilding projects, such as Kent Wildlife Trust’s Wilder Blean Project (the recipients of the 2022 Canterbury Climate Action Award).

Policy DM13 – Biomass Technology. We reject the proposals for any biomass development that uses wood as fuel. Although considered to be renewable, this is an unsustainable and damaging industry that is being challenged across the UK and across Europe. Canterbury District can lead the way in refusing this industry.

Policy DS25 – Renewable energy and carbon sequestration. Greenfield land, even intensive agriculture, constitutes natural carbon sequestration. We therefore urge for reduction of housing development on greenfield and agricultural land, and we strongly urge against the Eastern Movement Corridor. Likewise, the same considerations should pertain to future development elsewhere in the district, with the aim of maintaining the rural character and heritage. It is important to place strong safeguards on the integrity of rural and agricultural land in response to plans for large-scale industrial solar parks and monocultural plantations of biofuel crops. This policy must acknowledge the impact on rural communities and biodiversity, and indicate what is or is not an appropriate location for such projects.

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762976/latest-evidence-on-induced-travel-demand-an-evidence-review.pdf

¹⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762976/latest-evidence-on-induced-travel-demand-an-evidence-review.pdf

¹⁵ <https://www.transportforqualityoflife.com/u/files/Beyond-Transport-Infrastructure-fullreport%20July2006.pdf>

CONCLUSION

The **Draft Canterbury District Local Plan to 2045** contains some bold, visionary and radical proposals that could place Canterbury District on the map of forward-thinking and sustainable districts. However, far too much emphasis has been placed on housing and road development as the unique pathway towards achieving these sustainability objectives, and in so doing the objectives are severely undermined to the point of being unachievable.

This is evident with the **Local Cycling and Walking Implementation Plan**. Of the 135 schemes that have been proposed and costed, 131 are funded by CIL, S106 or S278, all of which are developer funds. Sustrans, Levelling Up, and Active Travel Funding account for just 4 of the projects. Modal shift and active travel are overwhelmingly contingent upon development. This demonstrates unequivocally the priorities of this housing-developer-led Draft Local Plan.

The alternatives have been insufficiently explored. This is most apparent with the Eastern Movement Corridor. The only alternative that is articulated in this consultation is the **Transport Topic Paper** with the “Do nothing approach” which recognises clearly and coherently a) that there is a traffic congestion problem in Canterbury and across the south east, and that b) ‘The transportation challenges that additional development brings exacerbate this problem’ (p.3). This second point is crucial. The additional development both of housing and road-building will clearly aggravate the very problems the Local Plan sets out to solve. However, the only alternative presented is doing nothing, as opposed to the articulation of plans and strategies to pursue all the sustainability objectives: public transport, modal shift, active travel, clean air zones, open spaces, protection of landscape and biodiversity, etc. etc. *without* the need for additional housing and bypasses. These alternatives are regrettably absent.

Now is the opportunity to be truly radical and to address the roots of the traffic problem. We must invest in public transport and active travel as a matter of absolute urgency, starting immediately. We must find ways to reduce the traffic, not encourage it. There is an appetite for this, as demonstrated in other cities and councils in the UK that have invested significantly in public transport and have deprioritised private car use.

Across the District there are active and engaged Friends Groups, Residents Associations, CICs, Parish Councils, expert bodies in conservation, biodiversity, heritage, housing and transport, student societies, faith groups, and other committed organisations. There is great energy and expertise here, and these civic bodies are vital for the future sustainability of Canterbury. They have, however, been deprioritised in favour of housing developers. This is neither inclusive nor sustainable. Great opportunities lie ahead for the City Council to demonstrate its capacity for radical thinking and visionary planning by working *with* the residents and the civic groups, by mobilising this energy and expertise – especially for funding bids – by listening carefully to local needs, concerns, knowledge and expertise, and by developing a Local Plan that puts the community and the land at its heart.

Dr William Rowlandson, Deputy Chair CCAP, and endorsed by the CCAP Board.
January 2023