



The countryside charity  
Kent

# CPRE Kent: 100 years of Safeguarding our Countryside

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Presentation to CARE

April 18<sup>th</sup> 2024

# National Planning Policy Framework

- Good planning allows the development and use of land to balance economic, social and environmental benefits and drawbacks
- Local authorities are required to have an up-to-date plan (and penalised if they don't)
- Local authorities have a duty to cooperate
- Local authorities have a duty to consult on the plans

# National Planning Policy Framework

- There is a standard method for assessing housing need:
  - Assess projected household growth using 2014-based household forecasts
  - Adjust this figure upwards in areas where house prices are higher relative to local earnings
  - Cap this increase, depending on the status of its existing plans.
- This is the starting point

# ...that algorithm...

Housing requirement calculation:

*Adjustment Factor*

$$= \left[ \left( \left( \frac{\text{Local affordability ratio}_{t=0} - 4}{4} \right) \times 0.25 \right) + \left( (\text{Local affordability ratio}_{t=0} - \text{Local affordability ratio}_{t=-10}) \times 0.25 \right) \right] + 1$$

Where  $t = 0$  is current year and  $t = -10$  is 10 years back.



Draft Canterbury District

# LOCAL PLAN

2040

# ...that algorithm...

Steps	Result
Step 1: Household Growth <sup>4</sup>	818 (per year)
Step 2: Affordability adjustment factor  Local affordability ratio: 10.46  $\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$	1.40375
<b>Canterbury LHN</b>  = Household growth x affordability adjustment factor	<b>1,149</b>
Step 3: Cap and Step 4: Cities and urban centres uplift	N/A

## NPPF: 'Exceptional Circumstances'

*Paragraph 61:* “The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area... There may be **exceptional circumstances**, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need...”

# NPPF: 'Exceptional Circumstances'

Development Topic Paper, February 2024

E4. “The council cannot demonstrate exceptional circumstances, such as those exemplified in the NPPF, and are therefore required by national policy to plan for the need identified by the standard methodology.”



# Reasons for Exceptional Circumstances

## **Demographics:**

- Unusually high student population
- Failure to meet affordable housing needs

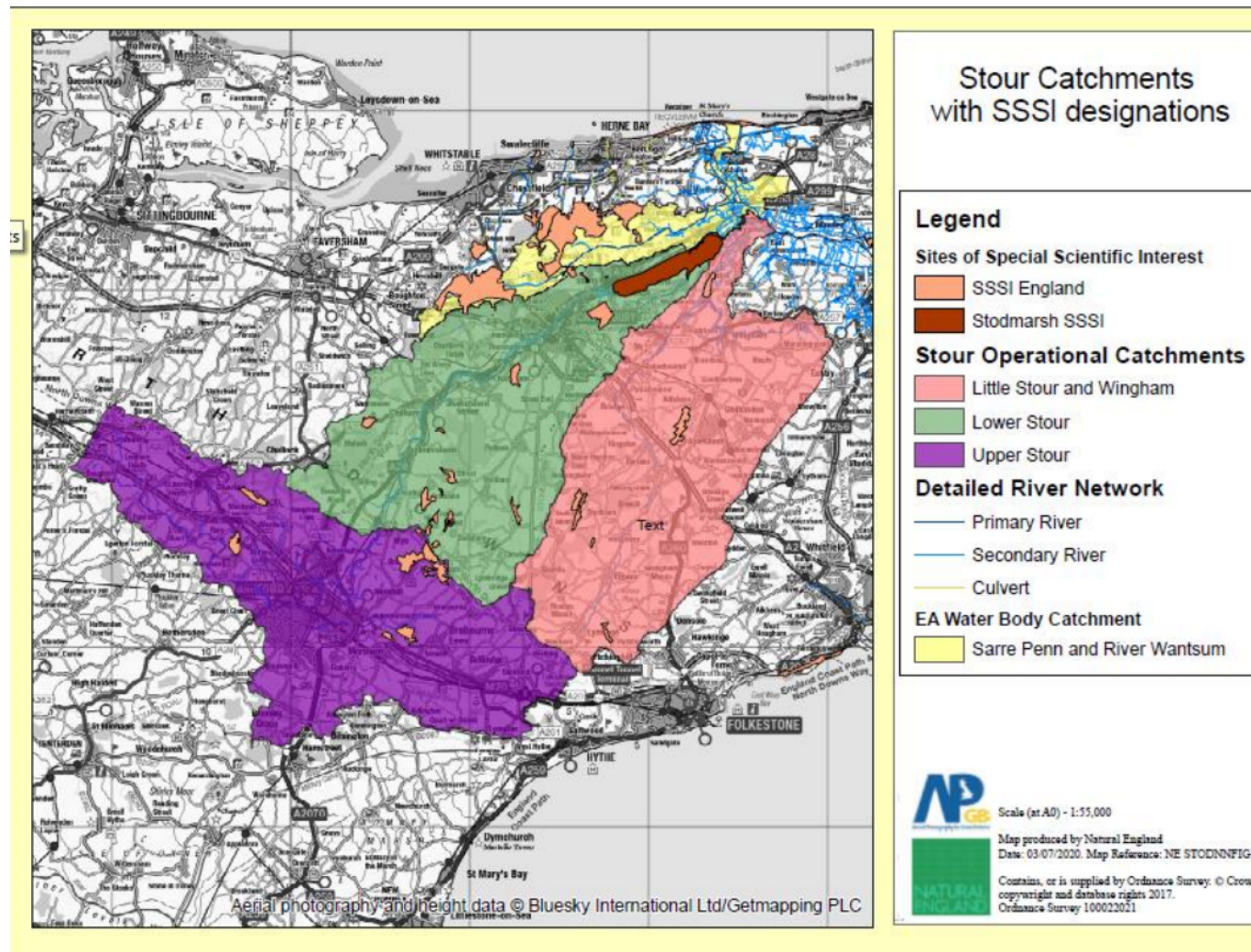
## **Environmental:**

- 27% National Landscape (AONB)
- 15.6% ancient woodland
- 2 NNRs
- 15 SSSIs

## **Cultural:**

- 3 World Heritage Sites

# Nutrient neutrality...



# The Housing Merry-go-round that needlessly threatens our countryside



1: Unrealistic targets set

2: Large land allocations

3: Developers cherry-pick sites for maximum profit

4: Building rates kept low to maximise prices

5: Targets are inevitably missed

6: Councils forced to allocate more land

7: ...more cherry-picking...

8: ...and round we go again...

# Early wins from the last Local Plan

- Removal of traffic zoning plans
- Removal of the Eastern Bypass
- Reducing the Plan Period and therefore the number of homes
- ...and removing Policy R1 (Cooting Farm, a 'garden village' of 3,200 homes)

# Consultation responses

From the consultation website:

- We strongly recommend that you use the survey form to submit your comments, but you can submit your comments in writing to [consultations@canterbury.gov.uk](mailto:consultations@canterbury.gov.uk).
- If you choose to send your comments in writing, please make it clear which policies your comments relate to and include your name and address, as anonymous representations cannot be accepted.

# Canterbury Local Plan 2040

- Planning law requires all decisions to be made in line with the adopted local plan.
- This is your best opportunity of influencing the plan

It's flexible

You are  
responding to  
your Council

They need your  
opinion

They need to  
demonstrate they  
have listened

# Making your representation effective

Don't rush

Focus on your  
key areas of  
concern

Use your local  
knowledge

Think about  
improvements

Make your  
voice heard!

Cite evidence

# CPRE's six tests for planning

- Local democracy and community engagement
- Biodiversity and nature's recovery
- Affordable housing and developer contributions
- Climate and sustainable development
- Beauty and heritage
- Health and wellbeing



# FAQs



Below you'll find answers to our most frequently asked questions.



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Below you'll find answers to our most frequently asked questions.

## Could you explain the Local Plan process and what happens from initial consultation through to adoption?

A Local Plan is a vitally important document that sets out where and what new development is to be allowed within a council's area over the next 15 to 20 years.

Once a Local Plan is approved, the law requires that all planning decisions be made in line with that Plan except in very special circumstances (known as material considerations). This may even be where a council subsequently changes its mind after a Local Plan is approved!

Unfortunately, the first time many people hear about a proposed development is when there is a planning application for that development, not when it is firstly being considered as a potential development within a Local Plan. By this point, it is often too late to object against the principle of the development.

For this reason, we strongly encourage those who care about Kent's countryside to engage with the Local Plan process. This is also why we campaign at national level for much better community involvement throughout this process.

We however recognise commenting on a Local Plan can be very complicated and can take up a lot of time. That is why we at CPRE Kent will always prioritise robustly responding to Local Plans in the county on behalf of our members and supporters. Above all, we will be seeking to ensure Local Plans protect the countryside and result in well-designed, locally-led planning proposals in sustainable locations.

To find out more about the Local Plan process, we have produced a flow chart setting out the various stages involved. [See flow chart \(PDF 54 KB\)](#).

# Our future

- Like most charities, CPRE locally and nationally is suffering losses of membership and funding
- We rely wholly on our members, supporters and benefactors for funding
- Please consider supporting us, joining as a member, or joining as a volunteer
- Visit [cprekent.org.uk](http://cprekent.org.uk) and click on 'support us'
- **Thank you!**

# Consultation responses

## DRAFT CANTERBURY DISTRICT LOCAL PLAN 2040

### Policy SS3 - Development Strategy for the district

1. Between 2020/21 and 2040/41 provision is made through the granting of planning permission and the allocation of sites for:
  - (a) an average of 1,149 new dwellings per year including affordable housing, older persons housing and a range of sizes and types of housing to meet local needs;
  - (b) 54 pitches for gypsy and traveller accommodation;
  - (c) 30,780 sqm floorspace for office use;
  - (d) 45,160 sqm floorspace for light industrial use;
  - (e) 11,200 sqm floorspace for general industrial use;
  - (f) 53,960 sqm floorspace for campus, north of Canterbury, which will provide new homes, jobs, services and infrastructure.
3. Whitstable Urban Area and Herne Bay Urban Area will be the secondary focus for development in the district. New development will be supported on suitable sites within these urban areas.

Whitstable town centre and Herne Bay town centre will continue to be key district centres and a focus for commercial, leisure and tourism at the coast, complemented by the edge-of-centre Commercial Areas at Estuary Park and Altira Park.

This plan allocates land for a Strategic Development Area at south Whitstable