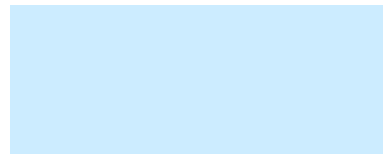


# Canterbury District Core Strategy Options Report

## Representations Analysis



May 2012

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## EXECUTIVE SUMMARY

*The Canterbury District Core Strategy Options Report was published by Canterbury City Council for consultation in January 2010. These Options included a series of Sustainability Objectives, Strategic Development Options and Core Policies to guide the development of the District over the next 15 years.*

*A period of six weeks was made available for comments on the Options Report, running from 21 January to the 5<sup>th</sup> March 2010. This Background Paper presents an analysis of all the responses received and a summary of the main issues arising from this consultation process in compliance with regulation 30 (1) (d) (iii) of the Town and Country Planning (Local Development) (England) (Amended) Regulations 2008.*

*During this period a total of 3,246 representations were received from 689 individuals, statutory consultees, agencies and organisations. Such a high level of response comprised a wide range of comments, along with expressions of support and objections.*

*Respondents were invited to complete a Representation Form and to state their views on both the draft text and, in particular, to a series of 10 specific Consultation Questions. 75 % of responses received were to the Consultation Questions, with the remaining 25% being comments on the text of the Report. 63% of respondents registered their submissions as objections, and 27% as supports. Respondents did not categorise their representations as either supporting or objecting in 10% of comments received.*

*Over two thirds (71%) of the total number of responses were to the invitation set out in 8 out of the 10 Consultation Questions for suggestions of alternative approaches, or the identification of other issues, that the Document should be addressing. The dominance of such narrative, as opposed to tick box, responses are particularly helpful in working on the next stages of the Core Strategy / Development Plan but make absolute quantifiable*

*assessments inappropriate as the sole method of analysing the consultation exercise in this instance.*

*Responses were heavily focused on a small number of elements of the Options Report. Almost half of all representations received were made to Chapter 8 (Strategic Development Options) and a further 20% to Chapter 9 (Core Policies) with, unsurprisingly, the background chapters which set out issues such as the evidence base for the Options receiving low numbers of comments. Similarly, just over 50% of all responses to the Consultation Questions were made to the two Questions (5 and 6) which focused on the Strategic Development Options, and 20% to the Question (9) on the proposed Core Policies.*

*A number of co-ordinated campaigns emerged with multiple entries of duplicate responses objecting to development to the south of Canterbury, to an additional Park and Ride facility for the city at Harbledown and to additional slip roads to the A2 being received. Although not included as an option, 12% of responses proposed additional development at Hersden on the A28 to the East of Sturry.*

*Since the publication of the Core Strategy Options Report there have been considerable changes at every level of the planning policy context in which the Canterbury Core Strategy, now to be known as the Canterbury District Local Plan, will sit. At national level a new National Planning Policy Framework was published and brought into force in March 2012, while the Localism Act was passed in November 2011. At a regional level, following the revoking of County Structure Plans in 2009 it remains the government's stated intention to revoke regional strategies so that the South East Plan will shortly no longer be part of the development plan shaping development policy in Canterbury District. At district level a new Corporate Plan for Canterbury was adopted in September 2011.*

*Against such a new policy background Canterbury City Council is currently working on a draft Canterbury District Local Plan to be published for consultation in the autumn of 2012. The main issues that arose from the consultation on the Options Report, as set out in this Background Paper, will in turn feed into and form part of the evidence base to this emerging draft Local Plan.*

## 1. INTRODUCTION

- 1.1 The Canterbury District Core Strategy Options Report (to be referred to in this analysis as the Options Report) was published for public consultation in January 2010. This Background Paper has analysed all responses received and presents a summary of the main issues arising from this consultation process in compliance with Regulation 30(1) (d)(iii) of the Town and Country Planning (Local Development) (England) (Amended) Regulations 2008.
- 1.2 The Options Report received a high level of response and a wide range of comments, expressions of support and objections. Respondents were invited to state their views on both the draft text, including Strategic Development Options and Core Policies, and a series of specific Consultation Questions. All but two of the ten Consultation Questions sought the opinions and suggestions of stakeholders, residents and consultees on alternative approaches or the identification of other issues that the document should be addressing, in addition to support or object responses. As a result the majority (71%) of responses were discursive in nature, making absolute statistical assessments inappropriate as a sole method of analysis of this Report. This Background Paper therefore presents a largely narrative-based assessment of the main issues raised, with results presented in graph and tabular form also as appropriate.
- 1.3 National guidance no longer requires Local Planning Authorities to respond to every representation and issue raised individually as in the past; rather Local Planning Authorities should provide *“a summary of the main issues arising”*<sup>1</sup> from representations received. Guidance from the Planning Inspectorate in this regard also confirms that *“the focus at examination is no longer on individual objections as used to be the case at local plan/UDP inquiries [...] local planning authorities no longer need to respond to each and every individual representation. What authorities are required to do is to assess the representations made at publication stage and to provide the Inspectorate with a summary of the main issues at submission.”*<sup>2</sup>
- 1.4 Planning Authorities are also required to note how these representations have been taken into account in the production of the next stages of the Development Plan Document. It is expected that such responses will be appended to this Background Paper by the City Council as work on the draft Canterbury Local Plan progresses.

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<sup>1</sup> Town and Country Planning (Local Development) (England) (Amended) Regulations 2008 Regulation 24 (2) (a(iv) (cc))

<sup>2</sup> DPD Examination Procedural Notes, *The Planning Inspectorate* 2009

## 1.1 THE CANTERBURY DISTRICT CORE STRATEGY OPTIONS REPORT

- 1.1.1 The Canterbury District Core Strategy Options Report presents a **vision** for the District developed by the City Council through its Futures Study (work undertaken for the City Council by Experian in 2006). A set of **objectives** for the District is proposed which seek to ensure that the Core Strategy implements the vision. These objectives are primarily influenced by the East Kent Sustainable Community Strategy, the Canterbury District Strategy, a study of the issues that the District faces, together with the local, regional and national strategic planning policy background.
- 1.1.2 The Options Report outlines the known **development requirements** for the District, including the overall amount of housing and employment development required to be planned for. A **settlement strategy** is proposed including a settlement hierarchy to help determine the scale and broad locations of development that could be allowed in principle for housing, employment and retail services in settlements across the District.
- 1.1.3 The Options Report continues by identifying a set of **strategic development options** for delivering the vision and objectives. Although the options are set out in the document as a series of discrete alternatives, the Council makes clear that they are intended to act as a “menu”, from which a combination of options will be taken forward. In this respect the Report presents initial conclusions about which options should be considered further. (Options relating to Park and Ride provision at Canterbury and the provision of a marina at the coast and a football hub are also included in this Report).
- 1.1.4 The Core Strategy is required to present a set of **Core Policies** that will assist in delivering the vision and objectives. A set of proposed Core Policies is therefore included at this Options Report stage; Policies which will be developed in more detail as the Core Strategy is prepared.
- 1.1.5 Finally the document sets out the key issues and principles for the development of an **implementation plan**.
- 1.1.6 Although feedback was invited on all aspects and elements of the Options Report the consultation process was focused on a series of ten Consultation Questions set out at key stages in the Report:

<b>Question 1:</b>	Key issues	(found in Chapter 2)
<b>Question 2:</b>	Core Strategy Objectives	(found in Chapter 5)
<b>Question 3:</b>	Development requirements	(found in Chapter 6)
<b>Question 4:</b>	Settlement Hierarchy	(found in Chapter 7)
<b>Questions 5 - 6 :</b>	Strategic Development Options	(found in Chapter 8)
<b>Questions 7 - 8:</b>	Other Key Development Options	(found in Chapter 8)
<b>Questions 9:</b>	Core Policies	(found in Chapter 9)
<b>Question 10:</b>	Implementation	(found in Chapter 10)

## 1.2 THE CONSULTATION PROCESS

- 1.2.1 A period of six weeks was made available for people to make comments on the Options Report, running from 21st January, through to 5th March 2010. Statutory consultees, community and voluntary groups, and those who had been involved or expressed an interest in the preparation of the Options Report were informed directly by letter. A Public Notice was placed in the local press along with advertisements for exhibitions which were held in the districts principal settlements of Canterbury, Herne Bay and Whitstable. Key elements of the Options Report were set out in display format at these exhibitions and council officers were on hand to discuss the draft proposals.
- 1.2.2 The Options Report and associated documents were also made available for comment on-line using the Council's consultation web-site <http://canterbury-consult.limehouse.co.uk/portal> and during normal office hours at the main Council Offices in Canterbury, the two Divisional Offices at Herne Bay and Whitstable, the offices of Kent County Council and the six Public Libraries in Canterbury District including the mobile library. Representation Forms were available at these venues, from the Planning Policy Website <http://www.canterbury.gov.uk/planningpolicy> or on request from the Planning Policy Team. A consultation alert was placed on the Council's main home page [www.canterbury.gov.uk](http://www.canterbury.gov.uk).
- 1.2.3 A summary leaflet was made available at all venues, postcards were produced and distributed for comments to be submitted and an article placed in the Winter 2009 edition (with reference also made in the Leader's column in the Spring 2010 edition) of the Council publication *District Life* which is distributed to every household in the



District, alerting residents to the publication of the Options Report for public comment.

- 1.2.4 Comments were invited and received, online, by email using an electronic version of the representation form, and by post using the representation form. The Council also received numerous letters and emails with views on the Options Report which did not use the format of the representation form. Such submissions were inputted into the database by Council officers.
- 1.2.5 A total of 3,246 representations were received from 689 individuals, statutory consultees, agencies and organisations. In line with national guidance representations which covered a number of policies or paragraphs of the Report were subdivided to ensure that each point raised was individually noted. A significant number of comments were repeated by a number of respondents against differing sections of the Options Report. In summarising the main issues raised in the consultation on the Options Report, reference to such duplicate entries is not always made each time it occurs.
- 1.2.6 Of the 3,246 responses 71% were responding to requests for suggestions of alternative approaches, changes or additions to key parts of the Document, providing wide-ranging feedback to the Options proposed and robust platform for the next stages of the Plan preparation process. 63% of respondents registered their submissions as objections and 27% as supports. Respondents did not categorise their representations as either supporting or objecting in 10% of comments received.
- 1.2.7 Almost half of all representations received were in response to the Strategic Development Options set out in Chapter 8, with a further 20% received for the Core Policies proposed in Chapter 9 (see Figure 1).

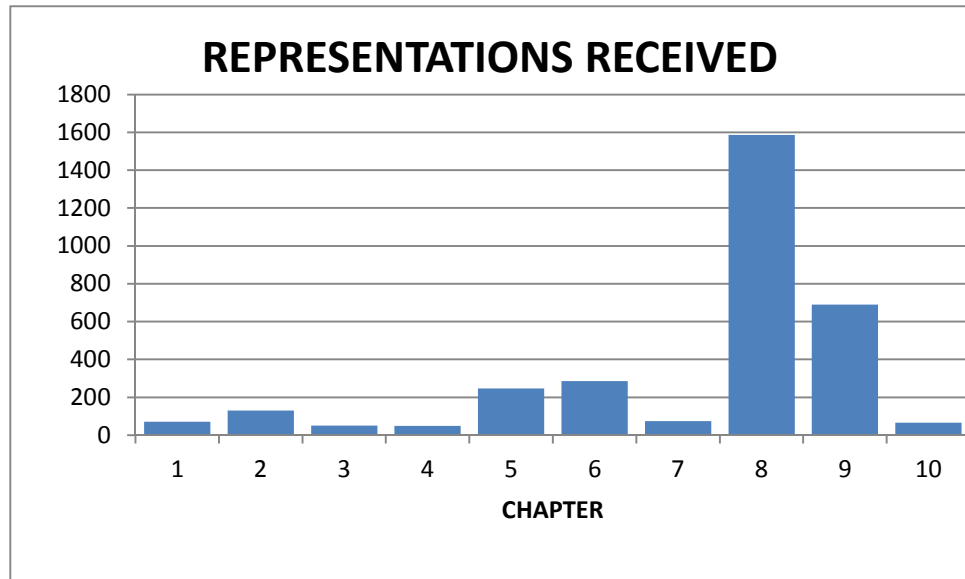


Figure 1: Representations received by Chapter

1.2.8 Similarly, just over half of all representations to the Consultation Questions were made to the Strategic Development Options (Questions 5 and 6), with 20% commenting on Core Policies (Question 9). Just less than 1 in 10 of the representations were to the proposed Objectives (Question 2) and a further 8% on the option of a new park and ride facility for Canterbury (Question 7) (see Figure 2).

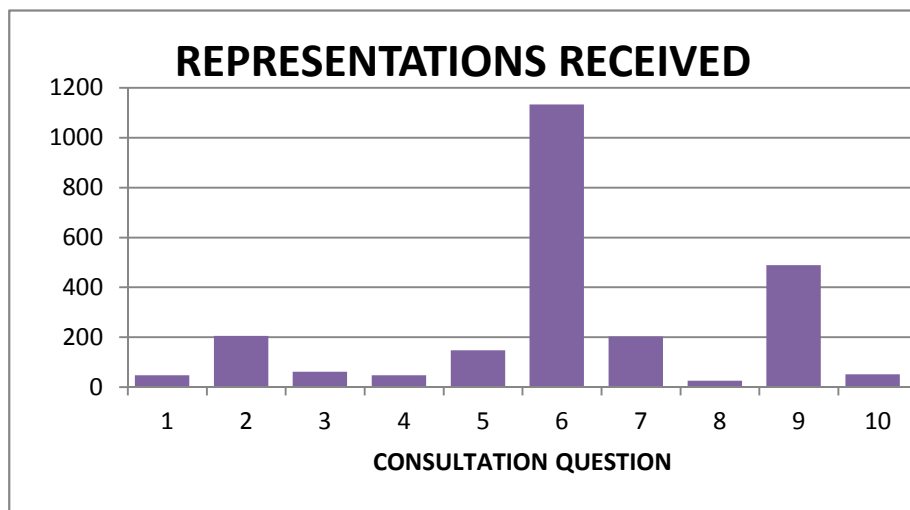


Figure 2: Representations received to each Consultation Question

1.2.9 Given the concentration of responses on the Core Objectives, Strategic Development Options and Core Policies proposed in the Options Report, representations made to these key issues are addressed in more detail in Tables 2, 3 and 4 of this Background Paper.

## 2. THE NEW PLANNING CONTEXT

- 2.1 Since the publication of the Options Report there have been considerable changes to every level of the planning policy context in which the Canterbury District Core Strategy, which will be taken forward as a single Local Plan, will sit and it is therefore appropriate to summarise these here.
- 2.2 At a national level a new National Planning Policy Framework (the NPPF) was published and brought into force in March 2012. This document aims to simplify the planning process through the revoking of all previous existing Planning Policy Guidance, Planning Policy Statements and Minerals Policy Guidance and Statements (though technical guides, circulars and a number of anomalies (such as Annex E of PPG7) remain in force at the time of writing), with a single Policy Framework. The NPPF is rooted in a presumption in favour of sustainable development, and re-emphasises the statutory position that planning applications should be determined in accordance with the development plan. It states that it is “*highly desirable that local planning authorities should have an up-to-date plan in place*”<sup>3</sup> and sets out guidance for the preparation of Local Plans.
- 2.3 Specifically, Local Plans should “*set out the opportunities for development and clear policies on what will or will not be permitted and where*”<sup>4</sup>, based on early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses. They should set out “*strategic priorities*”<sup>5</sup>, and “*plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework*”<sup>6</sup> Local Plans are required to be drawn up over a preferably 15 year time horizon, indicate broad locations for strategic development, allocate sites and provide detail on form, scale, access and quantum of development, identify areas where development would be inappropriate and contain a clear strategy for enhancing the natural built and historic environments. An adequate, up-to-date and relevant evidence base should form the basis of a Local Plan which will be examined to determine whether it has been positively prepared and is justified, effective and consistent with national policy.

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<sup>3</sup> National Planning Policy Framework, (2012) paragraph 12

<sup>4</sup> National Planning Policy Framework, (2012) paragraph 154

<sup>5</sup> National Planning Policy Framework, (2012) paragraph 156

<sup>6</sup> National Planning Policy Framework, (2012) paragraph 157

- 2.4 The NPPF also requires local planning authorities to determine housing and employment land requirements, and the Council has commissioned a study by Nathaniel Lichfield & Partners to provide evidence in this regard. Alongside that Study, the Council has also commissioned Ipsos MORI to carry out research to understand public opinion in relation to future development requirements (as identified in the NLP Study). The results of the Ipsos MORI research will need to be taken into account alongside the results of the Core Strategy consultation in considering the views of the public about development issues.
- 2.5 Under the NPPF, policies in existing adopted Development Plan Documents have full weight until 26 March 2013. However “saved” policies which are either saved, or were adopted in ‘old style’ local plans or Unitary Development Plans (and so are not DPD policies), or are out of sync with the NPPF in more than a ‘limited’ way, are superseded by the NPPF where they conflict. For Plans whose preparation is in progress, the policies within them will gain weight the more advanced the preparation stage, provided that they are consistent with the relevant policies of the NPPF.
- 2.6 Also at a national level the Localism Act was passed in November 2011. This wide-ranging Act aims to make the planning system clearer, more democratic and more effective. Amongst other matters, the Act enables the abolition of Regional Strategies (including the South East Plan), imposes a Duty to Cooperate on Local Authorities and other public bodies on planning matters, introduces a new right for communities to produce Neighbourhood Plans, with local planning authorities required to provide technical advice and support to neighbourhoods drawing up their proposals, and reforming the way that development plan documents are produced with a return to a single Local Plan to guide development in an area.
- 2.7 Following the revocation of the Kent Structure Plan in May 2009, it remains the government’s stated intention to revoke regional spatial strategies so that the South East Plan will shortly no longer be part of the development plan shaping development policy in Canterbury District.
- 2.8 At a District level a new Corporate Plan for Canterbury was adopted in September 2011. This Plan is based on the delivery of 10 ‘Pledges’ including planning for the right type and number of new homes in the right place to create sustainable communities in the future, supporting growth of the local economy and making the District cleaner and greener by leading by example on environmental issues.

2.9 Finally, since the Options Report was released the economy has experienced a prolonged period of recession, at both national and international levels, with consequences including substantial cuts in public services and very low levels of growth across many sectors of the economy. Major changes are also happening at national level to the way that universities and the education sector as well as the National Health Service are organised and funded, both significant employers, along with the public sector in this District.

**The following pages address the consultation responses to the Options Report by Chapter. The main issues raised are set out, together with the total numbers of representations received.**

**The numbers of representations shown for each Chapter are inclusive of those received to any Consultation Questions that fall within that Chapter.**

**The majority of the responses received were to the proposed Strategic Development Options, Core Policies and Core Objectives and representations on these issues are tabulated accordingly for ease of reference.**

**The Council's responses to these issues will be addressed as work on the new Local Plan progresses.**

# CHAPTER 1: INTRODUCTION

## CHAPTER THEME

Chapter 1 provides the background for the Core Strategy Options Report with information on the planning policy framework in which it sits, the research and evidence undertaken or commissioned by the Council which forms the base for the Options, a series of 16 Sustainability Objectives, the timetable for its production and the consultation procedures that will be followed at each stage in the development of the Core Strategy.

# 70

60 objections

4 supports

6 comments

Chapter 1 proposes 16 Sustainability Objectives which underpin the Options Report and have their origins in the Sustainability Scoping Report. Responses sought a number of changes to these Sustainability Objectives and these are set out below.

SUSTAINABILITY OBJECTIVE	SUGGESTED ALTERATION
<b>5</b> <b>To protect and improve landscapes for both people and wildlife and to protect and maintain vulnerable assets (including built and historic)</b>	REPLACE WITH: To conserve and enhance landscape and to protect and maintain vulnerable cultural and landscape heritage including architecture, archaeology and areas of tranquil countryside. REPLACE WITH: To protect, improve, enhance, create and connect priority habitats and other landscapes for both people and wildlife and to protect and maintain vulnerable assets (including built and historic)
<b>10</b> <b>To revitalise town and rural centres and to promote sustainable living.</b>	REPLACE WITH: To create more vibrant, cohesive and mixed town and rural centres and to promote sustainable living.
<b>11</b> <b>To encourage sustainable design and practice.</b>	ADD: High quality to design
<b>ADD OBJECTIVE</b>	To protect the quality and character of individual settlements and communities
<b>ADD OBJECTIVE</b>	Addressing the contribution of the Higher and Further Education sector in the District

## MAIN ISSUES RAISED

1. Incomplete evidence base. Transport Assessment, VISUM multi-modal transport model, SFRA and full SHLAA for example should be available upfront to inform both Options and comments. Evidence base for environmental objectives and policies not as clearly reflected in the document as that for other land-uses.
2. Online consultation process and forms complex and unwieldy. Consultation period should be extended to min of 8 weeks given scale of issues covered in the Document.
3. Reference made to Parish Plans and Village Design Statements supported.
4. More references needed to local residents in references to stakeholders; more acknowledgement of citizen involvement and promotion of local engagement.
5. Conflicting dates given for lifetime of Core Strategy with both 2026 and 2030 included in text.
6. Acknowledgement and reference needed to air quality and pollution issues.
7. Not enough detail in the Sustainability Objectives including information on how conflicts between them would be resolved. Suggest reference to Higher Education, given prominence in this District.
8. Glossary needed of planning terms.
9. More references to the importance of sport and physical activity needed linking with other Council strategies and targets.
10. Landscape Character and Biodiversity Assessment considered to be of an exceptional standard.
11. References needed to Kent Downs AONB Management Plan.
12. Suggest a need for a dedicated SPD and/or policy on Higher and Further Education sector.



## CHAPTER 2: PORTRAIT OF THE DISTRICT

### CHAPTER THEME

Chapter 2 introduces the District, drawing on the evidence base for the Core Strategy and covering such issues as environmental constraints, employment patterns, population estimates, housing market areas and key transport issues.

129

101 objections

8 supports

20 comments

### MAIN ISSUES RAISED

1. More detail required on transport and related issues including inclusion of references to walking, cycling and cycle routes
2. More analysis needed of the changes in farming practices, the importance of agriculture to the economy and landscape of the District. Greater emphasis upon its protection promoted.
3. Not enough consideration given to the recent expansion in student numbers in the District, particularly in Canterbury itself, and the HFE sector.
4. More acknowledgement of the archaeological heritage and historic significance of the city and World Heritage Site of Canterbury needed
5. Recognition of the need for more affordable family homes welcomed but more evidence needed to add weight
6. Further investigation of demographic patterns and trends needed
7. Reference should be included to the statutory Duty of Regard on the Council to take account of the need to conserve and enhance the Kent Downs AONB in the District
8. More detail required on landscape and wildlife designations to reflect their role and importance. Suggest that map differentiate in colour between national and international sites.

**Consultation Question 1**

**Are there any other key issues that you believe are essential to describe the Canterbury District as it is today?**

**Responses****47**

Many of the points raised in the representations on Chapter 2 are made again in response to Consultation Question 1.

1. More detail on transport and related issues eg congestion and health problems, cycling and walking infrastructure, the impact of High Speed Rail link.
2. More detail on landscape and wildlife designations, including in Map 1, to reflect their role and importance
3. Need to make greater reference to water – provision and potential shortages during lifetime of Core Strategy
4. Further investigation of demographic patterns eg distribution of population across settlements and growth in student population and its implications
5. More analysis of the district’s environment and importance of agriculture to the economy and landscape of the District, and greater emphasis upon its protection
6. More analysis of issues specific to Whitstable
7. More detail on the archaeological heritage and historical significance of Canterbury including consideration of the context of the World Heritage sites
8. References needed to young people and their well-being and to primary and secondary education provision and initiatives as well as tertiary education
9. Add in reference to the spiritual life of the District
10. Not clear whether work has been undertaken on the justification for retention of existing local landscape designations

## CHAPTER 3: STRATEGIC POLICY BACKGROUND

### CHAPTER THEME

**Chapter 3 sets out the strategic policy context for the Canterbury District Core Strategy. It outlines national planning policy, regional and sub-regional strategies and the local policy and strategy documents and studies which have informed the development of the Options Report.**

51

40 objections

3 supports

8 comments

### MAIN ISSUES RAISED

1. More clarification and interpretation of Canterbury's Regional Hub status needed including its role in the provision of regionally based housing requirements, the exact nature of the "focus on Canterbury", and its implications eg scale of new housing and major retail development needed
2. Objections to the weight attached to the East Kent Community Strategy and questioning of its democratic mandate
3. Development needs of Whitstable should be mentioned
4. More explanation of the background and status of documents eg the Canterbury Futures Study and the lifetime of saved policies of the 2006 Local Plan required
5. References needed to national strategies for climate change and renewal energy production such as the Climate Change Act 2008 and the 2009 White Paper.

## CHAPTER 4: THE FUTURE OF THE DISTRICT

### CHAPTER THEME

This chapter provides further background for the Core Strategy Options, reporting on the findings of the Canterbury District Futures Study, which has informed the preparation of the Options, alongside the objectives of sustainable communities and the impacts of both climate change and the current recession.

48

36 objections

5 support

7 comments

### MAIN ISSUES RAISED

1. Support for the aim of creating Sustainable Communities
2. Support for the 'green economy' concept but more clarity as to what the phrase means and work required. Core Strategy will need to reflect national goals of reduction in greenhouse emissions. Reference to the Kent Downs AONB Renewable Energy Position Statement suggested. Promote support for local heat and energy production.
3. More explanation of the Futures Study and clarification of the stakeholders who were involved in its preparation needed.
4. Acknowledgement sought that the impacts of an older population are broader than merely health related
5. Support for the Knowledge Economy.
6. Confirmation required that the 5 alternative scenarios in the Futures Study were tested through sustainability appraisal
7. Conflicts apparent between the Future Study's outcomes and between the Vision and other strategies
8. Include support for other sustainable rural businesses (not just tourism) particularly those which support the distinctiveness of the District

## CHAPTER 5: STRATEGIC VISION FOR THE DISTRICT

### CHAPTER THEME

Chapter 5 sets out the Council's Vision for the District for the period to 2030. 23 Objectives are outlined for consultation to deliver this Vision and to address the issues affecting the District in a focused and measurable way. Responses to individual objectives are summarised in Table 1 on pages 22 and 23 of this Report.

# 246

166 objections

77 support

3 comments

### MAIN ISSUES RAISED

1. Agricultural land should be protected
2. Vision for Herne Bay supported
3. Not enough consideration to implications of recent expansion in student numbers
4. Stronger role needed for Whitstable
5. High quality built environment should be an objective
6. Vision doesn't match the realities of recession and is not locally specific
7. Too many objectives
8. Importance of green infrastructure network needs to be included
9. Clearer linkages needed in document with and between objectives
10. "beating heart of East Kent" and "distinctiveness of village life" phrasing meaningless
11. Need references to supporting businesses
12. Specific objective requiring the conservation and enhancement of the Kent Downs AONB and its setting needed
13. Improve provision of safe cycle networks

### Consultation Question 2

**Do you agree that the range of Objectives are correct?  
If you don't agree, what other Objectives or changes to  
existing Objectives would you suggest?**

**Responses**

**205**

Many of the points raised in the representations on Chapter 5 are made again in response to Consultation Question 2.

1. Too many objectives. Not all appear to be genuinely strategic. Likely to present problems in measuring achievement. Could some of these objectives be more appropriately expressed as sustainability objectives that help inform choices rather than represent delivery outcomes? Could others be regarded as expressing a means to an end rather than the end itself? Is there a risk that with 23 strategic objectives, the plan might lose focus?
2. The core strategy should provide for a 15 year housing land supply from the date of adoption. We wonder which objectives and critical success factors best support that need.
3. Creation of jobs for local people should be mentioned
4. Assessment of alternative future economic growth scenarios needed
5. Perceived problems associated with recent increases in student numbers needs to be addressed
6. No development at south Canterbury
7. Protect highest grade agricultural land
8. Encouragement of tourism offer at odds with recent museum closures
9. Need for a survey of villages to identify affordable housing needs
10. Need to strengthen references to renewable energies
11. Regeneration of Herne Bay supported
12. Additional objectives suggested include **retail, renewable energy delivery, and provision of safe cycle networks.**

OBJECTIVE	COMMENTS RECEIVED
	KNOWLEDGE ECONOMY OBJECTIVES
1	Objection to description of Canterbury having a “catalyst” role in East Kent – this is a role assigned to the Ashford Growth Area
2	ADD support for businesses which in themselves support the distinctiveness of the District and to traditional employment. Would welcome definition of “cultural and creative industries” in a Glossary.
3	Concerns expressed about the capacity of the City to absorb an additional third level institution.
	EXPERIENCE ECONOMY OBJECTIVES
4	ADD “extends and enhances” after “safeguards”
5	ADD “sustainable” before tourism. This objective is at odds with plans to close museums in the District. Concerns about impact of increased visitor numbers on protected environments.
6	Support cultural facilities as an important element of successful town centres. Resist closure of museums.
7	Role of sport in enhancing economy supported Regeneration of Herne Bay supported
8	ADD reference to Whitstable Concerns about the adequacy of measures to protect European sites from recreation pressure in the Herne Bay area
	GREEN ECONOMY OBJECTIVES
9	ADD objective specifically requiring the conservation and enhancement of the Kent Downs AONB and setting. ADD “conserve” after “protect” ADD aim TO create and extend. ADD BMV land after agricultural Natural England, Kent Wildlife Trust and Environment Agency support
10	Seek Code for Sustainable Homes Level 6 in new development
11	ADD “high quality” before design Seek Code for Sustainable Homes Level 6 in new development Renewable energy should be specifically referred to Environment Agency support
12	ADD “throughout the District” Environment Agency support
13	ADD “and landscapes” after “heritage” and “and natural” before “environment” What are “real benefits”? Suggested that replaced with “improvements” Seek to protect the setting of Canterbury City with Green Belt status

SUSTAINABLE COMMUNITY OBJECTIVES	
14	ADD “high quality sustainable” before alternatives Include reference to the desire for housing to be located close to existing employment Highways Agency support
15	ADD “including green infrastructure” after provision Needs to specifically acknowledge need to reduce greenhouse gas emissions and that the objective does not just relate to new development. Highways Agency and Kent Wildlife Trust support
16	It is unclear whether this falls within the remit of a Core Strategy.
17	ADD reference to provision of specialist accommodation. Increased provision of affordable housing supported.
18	Council has an obligation to provide pitches for gypsies and travellers.
19	ADD “and expand” after enhance, and “provision” after “open space” ADD reference to outdoor sports facilities and Public Rights of Way Environment Agency and Kent Wildlife Trust support
20	Needs to be redrafted to make more spatial Refer to working with others to achieve objectives ADD reference to indoor and outdoor sports facilities
21	ADD reference to need to provide cycle routes and links ADD requirement for green infrastructure provision ADD social care ADD “by means of forward funding mechanisms” ADD reference to indoor and outdoor sports facilities
INFRASTRUCTURE	
22	ADD requirement for green infrastructure provision South East Water, Highways Agency and Environment Agency support
23	ADD requirement for green infrastructure Environment Agency support

Table 1: Main issues raised to Core Objectives



# CHAPTER 6: DEVELOPMENT REQUIREMENTS

## CHAPTER THEME

This chapter explores the spatial implications of the strategic vision by identifying the vision and development priorities for Canterbury, Herne Bay, Whitstable and the rural areas. District-wide requirements for housing and for economic development and employment land, community facilities and infrastructure, together with those of the universities and colleges and the retail sector are set out here.

286

239 objections

23 supports

24 comments

## MAIN ISSUES RAISED

1. Widespread agreement that transport is the key issue to be resolved in relation to Canterbury. Need to encourage cycling and walking strongly supported.
2. More clarity is needed on future needs of higher education sector
3. Relationships between the Visions and the Spatial Implications is not clear and frequently unrelated
4. The housing requirement (derived from the SE Plan) is too high. Why is a housing figure assigned to Canterbury but not to Herne Bay, Whitstable or the rural areas?
5. Objections to new slip roads to A2 and to an additional Park & Ride facility which respondents consider needs more evaluation
6. Concerns that student housing is increasingly dominant and that it is not counted as part of housing numbers
7. More parking facilities needed especially at Canterbury West rail station as a result of High Speed rail services
8. What is “eco-standard” and “Canterbury standard” housing?
9. Vision for rural areas should include services as well as houses and jobs. References needed to parish plans and village design statements
10. Protection of Best Most Versatile agricultural land supported.

**Consultation Question 3****Development requirements:**

- 1. Do you think this document captures the broad development requirements for the District?**
- 2. If not, what would you add to/remove from the suggested requirements?**

**Responses****62**

Many of the points raised in the representations on Chapter 6 are made again in response to Consultation Question 3.

1. More research and evidence required on transport
2. Alternative modes of transport to the car including improved public transport provision should receive more emphasis
3. Objections to new slip roads to A2
4. Needs to be greater emphasis on the benefits of green infrastructure and public open space
5. Concerns about approach to student accommodation
6. Both support and disagreement received for the vision's concentration of housing in Canterbury
7. Need better infrastructure strategy to support increased population
8. Other development projects already in hand, including Football Hub, should be identified
9. Revise approach to employment land and accommodation
10. More analysis and strategy on health needs and facilities
11. More emphasis on need for provision of renewable energy sources
12. Concerned about absence of SFRA and lack of reference to one

## CHAPTER 7: DISTRICT SETTLEMENT HIERARCHY

### CHAPTER THEME

This chapter proposes a settlement hierarchy for the district based on the promotion of sustainable development and sustainable mixed-use communities in accordance with government guidance, a sequential approach to the location of new development, and the Canterbury Futures Study which recommended that future development be focused on the city of Canterbury.

**74**

56 objections

14 supports

4 comment

### MAIN ISSUES RAISED

1. The creation of sustainable mixed communities is supported
2. A sequential approach to the allocation of development sites is supported but support also expressed for development of previously developed land in villages before greenfield urban extensions
3. Objections to Settlement Hierarchy as defined in Options Report as out of date
4. Concerns about the sustainability trap faced by smaller villages
5. Reference to sequential approach to development in Flood Risk Areas is needed and to climate change issues
6. Object to lack of reference to Hilltop Community Design Statement

**Consultation Question 4****Do you agree with the settlement hierarchy identified on Table 3?****Responses****47**

1. Hersden should be classified as a larger village
2. Need to refer to special status of Broad Oak/ Sturry
3. Need to ensure delivery of a mix of house sizes
4. Need to explain the position of Chestfield and Yorkletts
5. Need to define “well served”
6. Include Herne and Broomfield and Chestfield in larger villages category
7. Move Barham down a tier
8. Need to clarify that not all settlements in the “large villages” category will be subject to greenfield land releases
9. Need to clarify the evidence base for the categories of villages
10. Little distinction should be made between the three urban areas of Canterbury, Herne Bay and Whitstable in allocating development
11. Concerns about development which could affect the Blean SAC
12. Need to acknowledge role of Parish Plans in shaping settlement strategy
13. Regeneration at Herne Bay supported

## CHAPTER 8: STRATEGIC DEVELOPMENT OPTIONS

### CHAPTER THEME

This chapter sets out seven options (with one option divided further into three distinct options) for the distribution of new development in the district during the lifetime of the Core Strategy. The text explains that these strategic development options represent a “menu” of options and it is likely that a combination of a number of options will provide the most appropriate strategy for development.

# 1,586

724 objections

622 supports<sup>1</sup>

240 comments<sup>2</sup>

### MAIN ISSUES RAISED

1. Objections to development at South Canterbury
2. Need to reduce pace of change
3. Equal approach to detail of each option needed
4. Methodology as set out in Options Report is subjective and crude – 4 options are dismissed immediately
5. Flood risk not considered equally. Flooding constraints refer to all options not just 3a
6. Concerns over capacity of transport infrastructure
7. Inconsistency in dealing with strengths and weaknesses of different options
8. New settlement option is not treated seriously or comparably
9. Need to disperse development more evenly
10. Other options raised, particularly Hersden, Blean and Aylesham (which lies outside the jurisdiction of the City Council in Dover District)

**THE MAJORITY OF RESPONSES TO THIS CHAPTER WERE TO THE STRATEGIC DEVELOPMENT LOCATION OPTIONS PROPOSED. THESE RESPONSES ARE SET OUT BY OPTION IN TABLE 2 ON PAGES 33-35 OF THIS STUDY.**

<sup>1</sup> This figure includes 293 representations in support of development at Hersden which were registered as support though such an Option is not specifically raised in the Options Report

<sup>2</sup> this figure includes 187 comments on park and ride options and 26 comments on Marina location options which invited multiple responses rather than straight support/object options

### Consultation Question 5

**Do you agree with the strengths and weaknesses associated with each option?**

### Responses

**147**

There was considerable duplication of responses to Consultation Questions 5 and 6 given that they both focus on the Strategic Development Options outlined in this Chapter.

The main issues raised in the responses to these Questions have therefore been jointly assessed and the results are set out in table 3 overleaf.

Each Option received more objections than supports in answers to Consultation Question 5. However, in responses to Consultation Question 6 all Options with the exception of Option 3B received more supports than objections (though a significant number of these Option 3B comments were representations proposing and supporting development at Hersden which had registered as support, but as development at Hersden is not specifically promoted in this Chapter should be seen as objections).

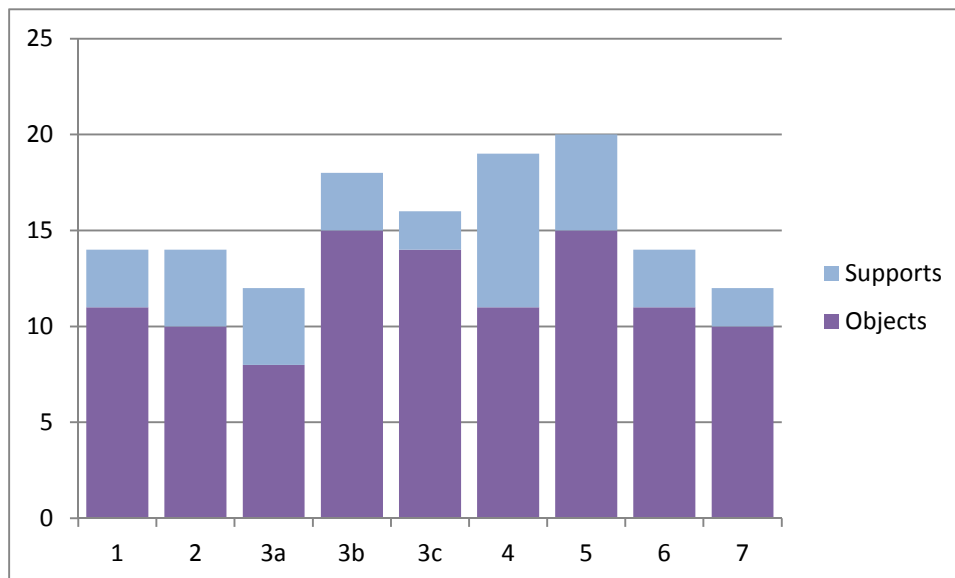


Figure 3: responses to Consultation Question 5 by Option

### Consultation Question 6

1. Do you agree with the conclusions relating to the combination of options requiring further testing at the next stage as set out in this Chapter?
2. If not, which option, or combination of options, would you prefer?
3. Are there any other realistic “reasonable alternatives” that should be tested?

### Responses

# 1,134

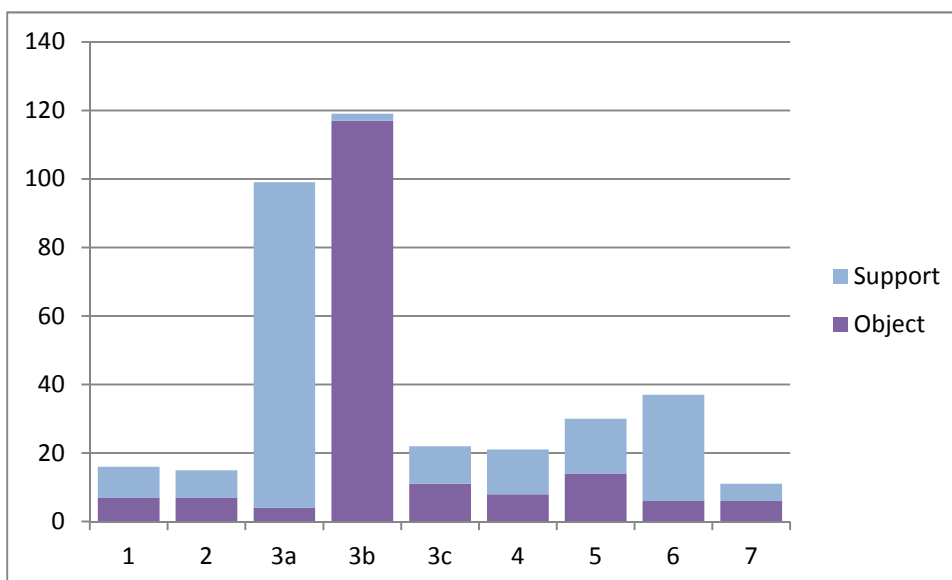


Figure 4: response to Consultation Question 6 by Option

There was considerable overlap between representations on Options 3a and 3b here with those supporting a dispersal of development around Canterbury (3a) doing so on the grounds that this would *not* deliver a single urban extension (3b) and vice versa.

This Consultation Question received 35% of the representations received to the Core Strategy Options Report as a whole. Aside from comments on specific Options, addressed in Table 3, issues which were raised in responses to Consultation Question 6 were:

1. Development should follow the existing ‘spokes’ routes into and out of Canterbury city
2. Need for transport impact study at Sturry

3. Need to protect historic settlement patterns
4. Propose the use of MoD land in the District including at Howe Barracks
5. Tackle bringing back into use of existing vacant properties
6. Universities should build on campuses and free up housing

Consultation Question 6 also sought suggestions on other reasonable alternative sites or approaches to the location of new development that should be examined. The most supported alternative locations promoted were **Blean** and **Broad Oak**. Low levels of support were also expressed for **Wincheap**, **Herne Bay**, **Littlebourne** and **Bekesbourne**. Development at **Cockering Farm**, **Hoath**, **Bettinge**, **Bramling**, **Adisham**, **Whitstable**, **Bridge**, **Barham**, **Upper Harbledown**, and **Bossingham** was proposed by a single individual in each case.

As noted above, there was considerable duplication of responses to Consultation Questions 5 and 6 given that they both focus on the Strategic Development Options outlined in this Chapter.

The main issues raised in the responses to these Questions have therefore been jointly assessed and the results are set out in Table 2 overleaf.



OPTION	COMMENTS RECEIVED
<p style="text-align: center;"><b>1</b> <b>City centre infill</b></p>	<ol style="list-style-type: none"> <li>1. Support for brownfield first approach</li> <li>2. Object as will result in loss of open space and will have detrimental impact on air quality</li> <li>3. Clearer information needed on how this Option would improve urban environment</li> <li>4. City infill should be a component of all Options</li> <li>5. This option would restrict choice</li> <li>6. Disagree with 'green' indicator for deliverability as such sites usually uncertain in deliverability</li> </ol>
<p style="text-align: center;"><b>2</b> <b>City centre infill and development in the wider urban areas of Canterbury, Herne Bay and Whitstable</b></p>	<ol style="list-style-type: none"> <li>1. Suggest Option changed to sustainable settlement expansion</li> <li>2. Development of brownfield sites supported</li> <li>3. Object as will result in loss of open space and will have detrimental impact on air quality</li> <li>4. Clearer information needed on how this Option would improve urban environment</li> <li>5. City infill should be a component of all Options</li> <li>6. Extend this Option to embrace brownfield opportunities in larger villages</li> </ol>
<p style="text-align: center;"><b>3a</b> <b>Canterbury Urban extension (dispersal)</b></p>	<ol style="list-style-type: none"> <li>1. Considerable support for this dispersal Option combined with maximising use of brownfield land (including at Hersden)</li> <li>2. Support as Option will not be wholly dependent on new infrastructure but rather will lead to maximum benefit from existing infrastructure and adjacent local services</li> <li>3. Will facilitate the integration of smaller sites with existing urban fabric and communities</li> <li>4. Dispersal Option unlikely to generate necessary new infrastructure</li> <li>5. Flooding constraints apply to all options</li> <li>6. Will not assist in coastal investment and regeneration</li> <li>7. Concerns that this Option will significantly increase traffic congestion</li> </ol>
	<ol style="list-style-type: none"> <li>1. High levels of objections received under this Option to proposed development at South Canterbury</li> <li>2. If large urban edge developments proposed the impact on adjacent rural areas of large urban edge developments should receive greater emphasis</li> </ol>

<p><b>3b</b> <b>Canterbury Urban extension (single site)</b></p>	<ol style="list-style-type: none"> <li>3. This option would encourage private car usage.</li> <li>4. Infrastructure should determine the location of development not the other way round</li> <li>5. This Option would represent urban sprawl.</li> <li>6. Too few large sites could result in delivery of housing problems.</li> <li>7. This option would damage the landscape setting of the city.</li> <li>8. The environmental impact of this Option is at odds with its 'green' rating</li> <li>9. Positive economic impacts on Canterbury city of this option cited need to be clarified</li> <li>10. Would restrict choice for new home buyers</li> <li>11. Will have the worst transport implications of the options with all future residents required to cross the city to access rail services</li> <li>12. Will lead to the loss of best and most versatile agricultural land.</li> <li>13. Has advantages in terms of tis capacity to deliver new infrastructure but likely to be hard to integrate with existing urban area.</li> </ol>
<p><b>3c</b> <b>Canterbury Urban extension (plus development at Herne Bay)</b></p>	<ol style="list-style-type: none"> <li>1. Need to demonstrate whether the distribution of development under this Option and associated scale of development at individual locations could provide sufficient support for the delivery of infrastructure referred to.</li> <li>2. Strong objections to extension of built up areas onto greenfield land</li> <li>3. Concern regarding impact of this Option on European protected sites.</li> <li>4. Support for development at Herne Bay.</li> </ol>
<p><b>4</b> <b>Urban extensions at Herne Bay and Whitstable</b></p>	<ol style="list-style-type: none"> <li>1. Likely to have significant negative impact on the Swale SSSI, SPA and Ramsar site.</li> <li>2. Poor fit with strategic planning objectives including for the city as a regional hub.</li> <li>3. Problems with past coastal developments being purchased predominantly as holiday homes.</li> <li>4. Serious transport problems in Whitstable.</li> <li>5. There is a lack of employment facilities in coastal towns to support any increase in housing.</li> <li>6. Development at Herne Bay supported.</li> <li>7. SFRA required to inform this Option.</li> <li>8. Option is confusing. Development should be centred on sites within defined urban boundaries before urban extensions.</li> </ol>
	<ol style="list-style-type: none"> <li>1. Objections made to the omission of Hersden from larger villages category.</li> <li>2. Objections to the inclusion of possibility of limiting this Option to only one "well-served" village.</li> </ol>

<p style="text-align: center;"><b>5</b> <b>Larger villages around Canterbury</b></p>	<ol style="list-style-type: none"> <li>3. Previously developed land in or adjacent to larger villages should be given priority for development over greenfield extensions.</li> <li>4. Likely to result in significant effects on European designated sites.</li> <li>5. Would not support strategic role of the Canterbury City</li> <li>6. Would not contribute to urban regeneration.</li> <li>7. Supported as would reinforce economic viability and vitality of larger villages.</li> <li>8. This Option would have less impact on traffic congestion in the city than other options.</li> <li>9. Concerned about impact of this Option on village character</li> </ol>
<p style="text-align: center;"><b>6</b> <b>Dispersal across the District</b></p>	<ol style="list-style-type: none"> <li>1. Likely to have significant negative impact on European designated sites.</li> <li>2. Poor fit with strategic planning objectives including for the city as a regional hub.</li> <li>3. Likely to be detrimental to village character</li> <li>4. The positive impact of well-planned housing development on viability of smaller communities in the District should be given weight.</li> <li>5. Support larger number of smaller developments.</li> </ol>
<p style="text-align: center;"><b>7</b> <b>New settlement</b></p>	<ol style="list-style-type: none"> <li>1. Difficult to comment as this is not treated seriously as an Option in this document – no strengths and weaknesses are identified and no potential location/s identified.</li> <li>2. All Options should be described in sufficient detail to allow for meaningful comment.</li> </ol>

TABLE 2: Responses to Strategic Development Options (Consultation Questions 5 and 6)

### Consultation Question 7

1. Do you agree with the options set out in relation to the provision of park and ride at Canterbury?
2. Are there any other realistic “reasonable alternatives” that should be tested?

Responses

203

Almost three quarters of responses to this Question were objections to a park & ride facility at Harbledown (74%). Of the options proposed in this Report the doubling of the existing facility at Wincheap received the most support – though one in ten of those responding to this Question did not want any further park and ride provision.

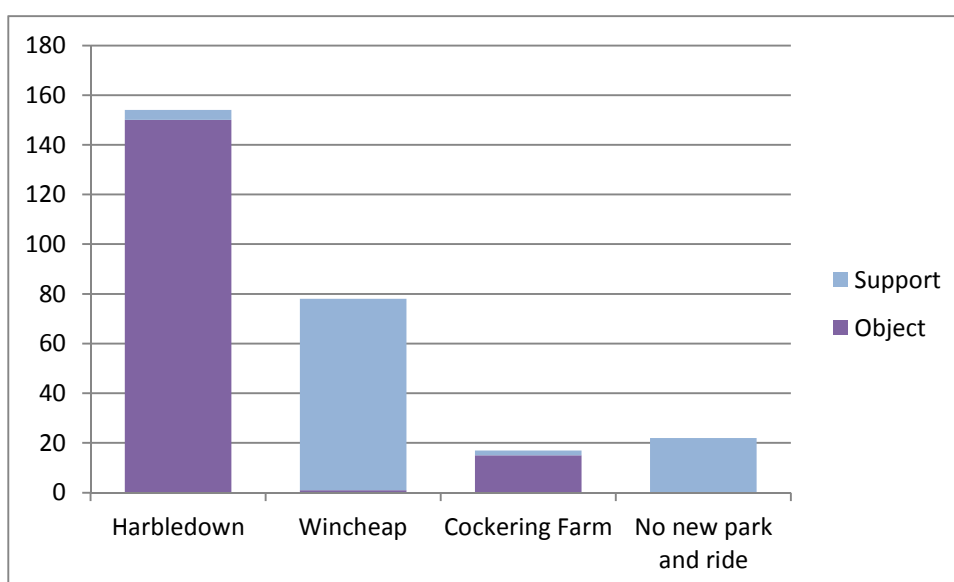


Figure 5: Park & Ride options responses

Six alternative sites were proposed by respondents. Of these **Brenley Corner** received the most support with 10 promotions, the **Victoria Hotel site** on the London Rd and the **Dunkirk airstrip** 3 each, while the **Blean** area and an upgrade of the **existing New Dover Rd** were suggested in 2 comments each. Finally the **former Wyevale garden centre** at **Upper Harbledown** was also suggested.

<p><b>Consultation Question 8</b></p> <p><b>1. Do you agree with the options set out in relation to the provision of marina facilities?</b></p> <p><b>2. Are there any other realistic “reasonable alternatives” that should be tested?</b></p>	<p><b>Responses</b></p> <p><b>26</b></p>
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Of the four Options proposed, Herne Bay emerged as having the most support though the numbers responding were statistically low on this issue.

A third of respondents to this question asked where was the evidence of need for a marina. Respondents also raised concerns that the Options Report proposed policies for the provision of park and ride, marina and football hub facilities but there was no commensurate commitment to an accessible walking and cycling network in the District.

Only one alternative site was proposed, outside the District in the neighbouring Borough of Swale at **Oare/ Faversham** on the Swale.

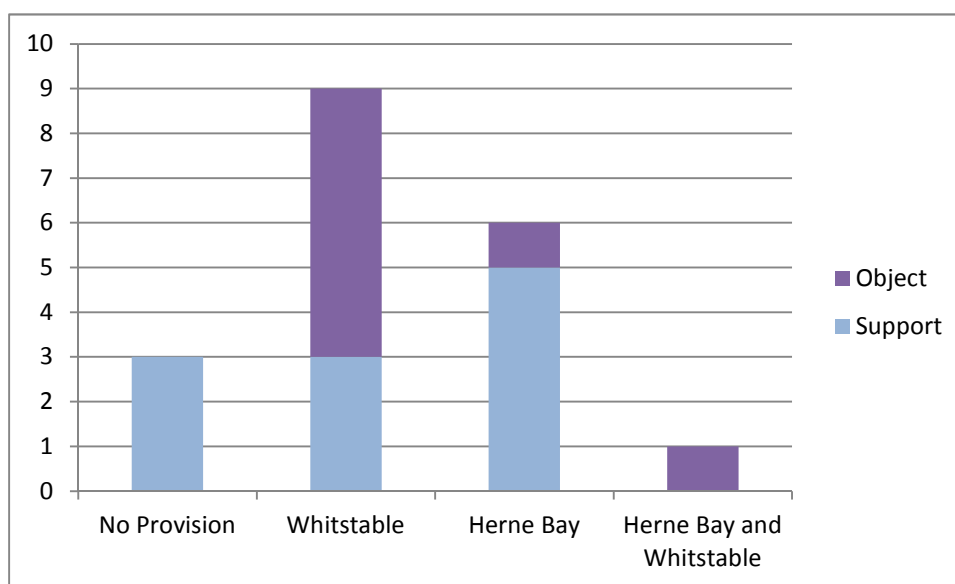


Figure 6: Marina options responses

<p><b>FOOTBALL HUB</b></p>	<p><b>10</b></p>
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Few responses were received on the proposal to create a Football Hub in the District with five objections, four supports and one comment. The proposals thus drew almost equal support and objection, with the provision of additional sports facilities in the City receiving support while the process by which this issue has already been progressed being objected to and leading to concern that it was therefore not a matter for inclusion in the Core Strategy.

# CHAPTER 9: CORE POLICIES

## CHAPTER THEME

This chapter proposes 12 Core Policies to guide the planning of the District to 2030 and outlines the scope and aims of each one. The evidence base and the policy context of each Policy are also set out.

690	574 objections	102 supports	14 comments
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Proposed Core Policy CP8 on Transport received a third of the objections made to this chapter, as shown below, the majority of these being on the subject of the proposed slip roads to the A2.

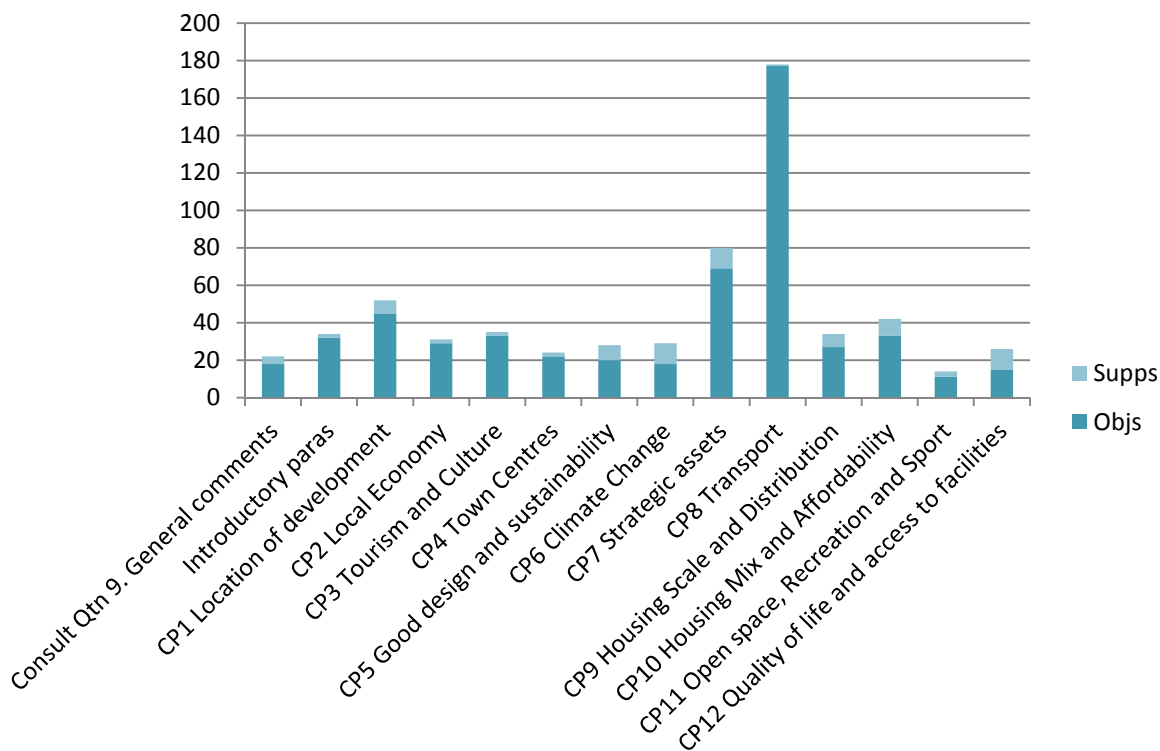


Figure 7: Responses by Core Policy

Three additional Core Policies were proposed on **education, sustainable transport infrastructure and the conservation and enhancement of the Kent Downs AONB.**

The main issues raised to each of the Core Policies follows in Table 3.

**Consultation Question 9**  
**Do you agree with the scope of Proposed Core Policies and do you think it will support the overall vision for the area?**  
**If not, what would you propose to add/remove?**  
**Please indicate the policy to which your comment relates.**

**Responses**  
**489**

Many of the points raised in the representations on Chapter 9 are made again in response to Consultation Question 9.

The responses to Consultation Question 9 reflect the overall pattern of response to this Core Policies Chapter with Transport again the greatest topic of concern.

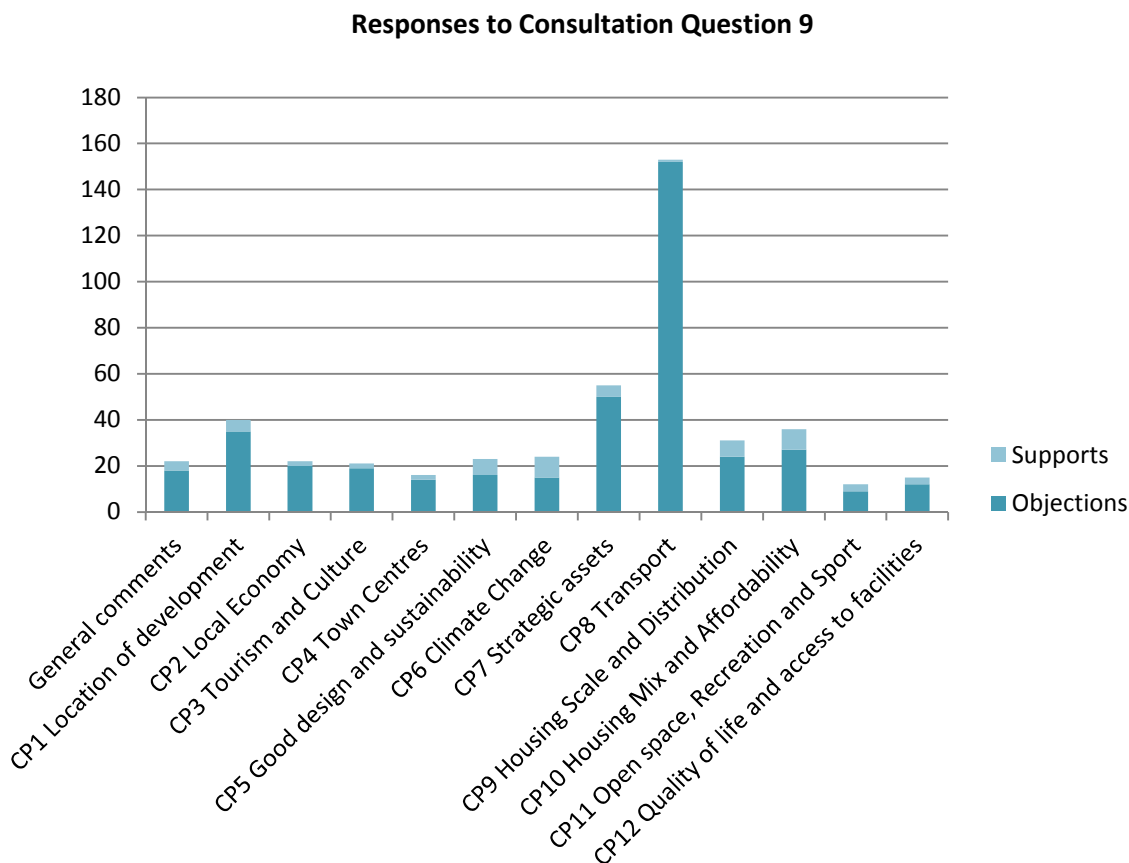


Figure 8: responses to Consultation Question 9 by Core Policy

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>1</b> <b>LOCATION OF DEVELOPMENT</b></p>	<ol style="list-style-type: none"> <li>1. Concern about any large extensions at Canterbury; planning approach should be more sensitive.</li> <li>2. Point 4 should place emphasis on Canterbury City. Policy should support the role of Canterbury as a regional hub.</li> <li>3. Settlement expansion needs to include Canterbury, Whitstable and Herne Bay – the Strategic Housing Market Assessment should assist with determining appropriate distribution.</li> <li>4. Policy should recognise the importance of making development accessible to walking, cycling and public transport.</li> <li>5. Point 5 too vague – what is “identified community need”?</li> <li>6. Policy should also include reference to education.</li> <li>7. A sustainable location policy which will assist in identifying sites and facilitate investment planning is supported and considered appropriate to a Core Strategy.</li> <li>8. Support for sequential approach but reservations about development in coastal towns due to impact on European habitat network</li> <li>9. Add reference to transport assessment and travel plans</li> </ol>

*TABLE 3: Responses to proposed Core Policies (Consultation Questions 9)*



CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>2</b> <b>LOCAL ECONOMY</b></p>	<ol style="list-style-type: none"> <li>1. Power of the knowledge economy should not be underestimated. Its development needs to be dovetailed with other services, particularly transport and housing.</li> <li>2. Need to review adopted sites and employment clusters in the Local Plan.</li> <li>3. Support for development of a high specification business park and protection of employment sites / properties</li> <li>4. Support the identification of need for digital infrastructure</li> <li>5. Make stronger reference to the 'Green Economy' including support for rural businesses</li> <li>6. Office and light industry is well accommodated at the coast, and there is small office space at Canterbury. Any more in the city will create traffic problems.</li> <li>7. Make reference to growth of education facilities at part d.</li> <li>8. There should be greater emphasis on economic growth, not the knowledge economy. Land use for business should take priority.</li> <li>9. Policy should distinguish between B Class employment uses and other employment floorspace and the extent to which this is to be provided through strategic sites or a subsequent site allocations document</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>3</b> <b>TOURISM AND CULTURE</b></p>	<ol style="list-style-type: none"> <li>1. Encouraging tourists welcomed. Promote a greater emphasis on economic growth through tourism. Support and encourage tourism. More hotels are needed.</li> <li>2. Policy should not be excessively prescriptive by restricting hotel development to specific (allocated) locations or zones.</li> <li>3. Encourage the upgrading and extension of existing accommodation stock, including affordable staff accommodation.</li> <li>4. Do not place an embargo on provision of caravan sites in the future. Small-scale static caravan sites may be a beneficial diversification.</li> <li>5. Recognise the potential business and economic benefits that conference facilities can bring to an area, converting visitor trips into staying trips.</li> <li>6. A policy adopting a more ‘open’ view of tourism accommodation, and providing opportunities for new high quality facilities (where these can be achieved without harmful impacts, or with improvements) may be required.</li> <li>7. Self-catering accommodation is considered to have particular growth potential. Rural self-catering is particularly beneficial to the local economy.</li> <li>8. Need to balance recreational tourism and nature conservation of designated sites.</li> <li>9. Tourism providers should ensure that designs are inclusive. Encourage greater accessibility to tourism facilities and services for people with disabilities.</li> <li>10. AMEND a) to add “to support the distinctiveness of the District”.</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>4 TOWN CENTRES</b></p>	<ol style="list-style-type: none"> <li>1. Possible that not all retail need could be accommodated in Canterbury City Centre and locations to meet need will have to be identified, with first preference for the town and city centres followed by well-linked/sustainable locations elsewhere in the urban areas, including regeneration areas.</li> <li>2. Policy CP4 should either be expanded or a separate policy provided relating to retailing, business and commercial leisure developments which may need to be, or would be appropriately located, outside town centres.</li> <li>3. Core Policy 4 could go further in seeking retail growth at Herne Bay that would assist in sustainable economic growth.</li> <li>4. Unlikely that Canterbury city centre will need an expansion of existing retail provision in the near future. There are about 50 empty shops, it is likely that the economic recession will be prolonged, that more shopping will be carried out on-line.</li> <li>5. If Canterbury is to develop out -of-town self-sustaining mixed communities then surely these will need their own retail facilities.</li> <li>6. Future site allocations should take the constraints of Canterbury City Centre into account and also assess whether retail need can be met in other locations in the city, particularly where there are existing concentrations of retail and sustainable transport links, for example in the Wincheap regeneration area.</li> <li>7. ADD to policy AN emphasis on provision of sustainable transport infrastructure.</li> <li>8. Impact on Dover should be considered within retail hierarchy.</li> <li>9. Policy should emphasise the importance of small independent traders.</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>5 GOOD DESIGN AND SUSTAINABILITY</b></p>	<ol style="list-style-type: none"> <li>1. Principle of Policy CP5 is supported.</li> <li>2. Care must be taken with the detailed wording to ensure that policy requirements are not unduly onerous or unrealistic.</li> <li>3. Sustainable Construction SPD should remain an essential element of the policy framework.</li> <li>4. Policy would be strengthened by inclusion of a requirement to achieve a minimum score of 14 out of 20 using the Building For Life criteria. Building for Life is the national standard for well designed homes and neighbourhoods.</li> <li>5. ADD clause regarding environmental enhancements within development design. Refer to Biodiversity Appendix of Kent Design.</li> <li>6. The importance of good design and related matters of local character and distinctiveness are not prominent in the Core Strategy as currently drafted. Policy should be amended to give prominence to the need for design to reflect place and distinctiveness</li> <li>7. Amend evidence base to include village design statements completed in the District and the Kent Downs Landscape Design Handbook.</li> <li>8. ADD reference to landscape design, not just buildings</li> <li>9. Incorporate water efficiency standards, Access to Natural Greenspace Standards (ANGST), Secured by Design and Green infrastructure as pre-requisite in new developments.</li> <li>10. Policy should refer to existing historic character of proposed development sites.</li> <li>11. Need to elaborate on the design principles and criteria that will underpin assessment of high quality and environmental performance of development proposals</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>6</b> <b>CLIMATE CHANGE</b></p>	<ol style="list-style-type: none"> <li>1. Policy should acknowledge that achieving a modal shift, especially towards cycling and walking is needed to mitigate against climate change.</li> <li>2. Consideration should be given to maximising on-site renewable energy generation, connection to CHP networks, off-site generation and contribution to an offset fund to provide clarity for developers.</li> <li>3. The City Council neglect to mention the detrimental Climate Change impact of reservoir development. An independent and impartial study should be commissioned to determine the impact of greenhouse gas emissions.</li> <li>4. Strong agreement that a Policy along the lines suggested is necessary.</li> <li>5. The need to address climate change issues needs to underpin the whole Core Strategy, and such is the importance of this issue consider that this should be the first Core Policy.</li> <li>6. This Policy should endorse the "Woking" model of local heat and energy generation.</li> <li>7. Care must be taken with the detailed wording to ensure that policy requirements are not unduly onerous or unrealistic .</li> <li>8. This policy is weak, the issues are identified but no actions associated with them appear.</li> <li>9. Support a policy setting out standards according to the Code for Sustainable Homes.</li> <li>10. Supportive of the expansion of the Blean Complex, the provision of Sustainable Urban Drainage Systems, the protection of water resources and the provision of habitat corridors to aid species migration.</li> <li>11. ADD reference to the Kent Downs AONB Renewable Energy Position Statement</li> <li>12. Policy could make reference to protecting protected landscapes of SSSIs andAONBs from effects of climate change.</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>7</b> <b>STRATEGIC ASSETS</b></p>	<ol style="list-style-type: none"> <li>1. Importance of a policy protecting the District’s Strategic assets is acknowledged.</li> <li>2. Policy should refer to the importance of landscapes and protection of existing city setting.</li> <li>3. Council should apply to gain Green Belt status to the city surroundings to prevent urban sprawl. This would protect both setting and landscape and would provide areas of wildlife and recreation.</li> <li>4. Policy should incorporate a degree of flexibility to allow consideration of the release of some ‘greenfield’ land to meet broader development requirements.</li> <li>5. Care must be taken with the wording of the policy to ensure that requirements do not go beyond what is reasonable in terms of National and Strategic Planning requirements.</li> <li>6. Strategic assets also include: AONB, seaside, salt marshes and chalk soils, local district museums, the Westgate Towers, the City Walls and Tower House etc outside Canterbury’s World Heritage Site, and Crab and Winkle line.</li> <li>7. Policy needs to be strengthened to reflect the need to protect the open countryside.</li> <li>8. It is noticed that no specific mention is made of the essential need to maintain green gaps between towns, town and village and between villages. Prevent ‘infill’ in green areas.</li> <li>9. Biodiversity protection for sites where known species, floral and fauna and proper land management must be made a strong policy. Policy should actively seek opportunities to achieve a net gain in biodiversity across the district.</li> <li>10. This is an excellent policy. The aims should fully protect nationally &amp; locally designated sites as well as establishing and protecting the strategic network throughout the urban and rural environment. Further measures may be needed to ensure protection of European sites but the creation, enhancement &amp; connection of the BOAs will ensure that the natural habitats &amp; species will be better protected from the effects of climate change &amp; development.</li> <li>11. ADD “management” after “protection” in first sentence and “conservation and enhancement” after “protection” in e)</li> <li>12. ADD reference to duty of regard for the AONB to 9.46 and to point f)and add reference to Green Infrastructure</li> <li>13. ADD reference to retention of SLAs and AHLVs which can serve as buffers for the setting of the AONB</li> <li>14. Need to co-ordinate with neighbouring councils on green infrastructure network shared protected landscapes</li> <li>15. Commend recognition of multi-functional green space and role it can play in climate change adaption and health.</li> <li>16. Not clear whether local landscape designations are to be retained.</li> <li>17. Need to make clear the weight given to local landscape designations as to national and international designations.</li> <li>18. ADD River Stour and bathing waters as important strategic assets.</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p><b>8</b> <b>TRANSPORT</b></p>	<ol style="list-style-type: none"> <li>1. In light of pledges to reduce emissions, provide a more balanced equality of opportunity for transport users, and an increased choice of transport options, it is extremely disappointing to see that these are not reflected as the key aims. The policy should be reworded to prioritise sustainable transport.</li> <li>2. Measures to reduce car dependence and provide alternative non-car travel modes must be adopted if air quality problems are to be taken seriously. Need to see some proposals on lessening the air pollution on the inner ring road. CCC should be taking steps to reduce CO2 emissions, primarily through discouraging private car use. A major failing within the LDF is the complete lack of provision of alternative forms of transport, such as:             <ol style="list-style-type: none"> <li>a) Improve rail service, including Canterbury to both Whitstable and Folkestone;</li> <li>b) An extensive local rail service, or tram service for areas adjacent to Canterbury;</li> <li>c) Support existing and proposed cycle routes, incl Crab and Winkle line;</li> <li>d) More bus priority measures and improved bus services;</li> <li>e) Housing should be linked to transport routes and location of schools, employment etc;</li> <li>f) Promotion of strategic multi-user transport routes</li> <li>g) Promote Green Travel plans more vigorously, incl working from home;</li> <li>h) Provide cycle hire points</li> <li>i) A greatly improved and integrated public transport provision</li> <li>j) City circle bus services or even an outer loop;</li> <li>k) Provision of attractive low energy alternatives for the future;</li> <li>l) Direct bus links between the two railway stations in the City</li> <li>m) All developments to provide pedestrian access to the existing footway network.</li> <li>n) Proper provision for walking and cycling.</li> </ol> </li> <li>3. The strategy overly relies on infrastructure improvements that will facilitate greater use of the private motor car. Improvement of the A2 Canterbury junctions together with associated demand management measures including additional park &amp; ride provision" appears to conflict with PPG13 and proposed Policy CP8 which seeks to promote a more sustainable transport system.</li> </ol>

4. Objection to the Park & Ride provisions included the following reasons: destruction of Grade 1 agricultural land; destruction of landscape heritage close to a medieval village and historical site; more through traffic in Harbledown, Rough Common and Chartham Hatch; use land which is in AHLV, SLA, and SNCI; air, noise and light pollution would have a deleterious effect upon the health of the village, and Vernon Holme School pupils; would increase road traffic and car dependence.
5. Objections to A2 slip roads :
  - (a) Do not improve the local traffic problem for those accessing the city centre.
  - (b) Additional slip roads on the A2 will increase traffic flows into the city, causing bottlenecks and encourage drivers to use narrow country lanes
  - (c) Any road space/ capacity created on the Ring Road by the A2 Slips will be of a temporary nature. Many would want to cross the city via the A2.
  - (d) Is at odds with the aim to reduce carbon emissions and improve air quality.
  - (e) It will increase pollution and oil dependence.
6. Supports for A2 Slip Roads :
  - (a) Large numbers of cars have to trawl round the ringroad in order to get past Canterbury centre;
  - (b) There need to be a way of getting to the north side of Canterbury .
  - (c) A2 slip roads at Wincheap are necessary to serve new development in the Wincheap Industrial Estate area.
  - (d) Canterbury is regularly gridlocked. The use of cars esp for older people must be accepted and roads built. Develop roads around the hub
7. Concerned that the Council has produced their plans for housing allocation without the benefits of the results of the VISUM transport modelling.
8. The Council should consider the wider implications of growth upon the network beyond the Canterbury District Council boundary and that this be reflected in future documents and sustainability appraisal, in particular Brenley Corner.
9. Highways Agency would expect the Core Strategy to set out the requirement for Transportation Assessments or Transport Statements to be undertaken as part of any development proposal.
10. Kent Downs AONB Unit would seek the promotion of strategic multi-user transport routes providing they are of very high quality design and landscaping and management.



CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>9</b> <b>HOUSING SCALE AND DISTRIBUTION</b></p>	<ol style="list-style-type: none"> <li>1. Object to development to south of Canterbury - consider alternative and brown field sites to meet the housing targets (e.g. Hersden).</li> <li>2. Locate housing on previously developed land in or adjoining the larger villages ahead of large greenfield urban extensions.</li> <li>3. Return of the existing housing stock to the use for which it was originally intended before continuing to allow the boundaries of the city to expand into the countryside.</li> <li>4. When location and scale of development are identified, impacts to the European networks must be factored into the final selection process.</li> <li>5. Parts (c) and (b) should be swapped, if the preferred option for new housing sites is to focus on one or more Strategic Sites, with the land supply supplemented by other, lesser scale development opportunities.</li> <li>6. Oppose the inclusion of the Simon Langton Girls' School site in future development plans, on account of the loss of the amenity of open space, and the high traffic generation on the Old Dover Road, as well as the loss of the agricultural land which would inevitably be used in constructing its replacement.</li> <li>7. Any significant housing development in or around historic city should involve master-planning to ensure we plan for communities rather than dwelling units.</li> <li>8. Council has an obligation to provide more pitches for gypsies and travellers. In advance of DPD will this policy establish criteria for locations?</li> <li>9. This Policy (or CP1) should establish relationship between strategic housing requirement and residual provision required.</li> <li>10. Needs reference to densities.</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>10</b> <b>HOUSING MIX AND AFFORDABILITY</b></p>	<ol style="list-style-type: none"> <li>1. This policy is specifically aimed solely at affordable housing and student accommodation. Needs to address private housing need, mix, type or size.</li> <li>2. Whilst the evidence base identifies a future growth in the number of older persons the proposed policies do nothing to address such an identified housing need which is going to become more acute.</li> <li>3. The student population puts large amount of pressure on existing housing in the area, particularly near Universities. Further analysis needs to be undertaken to address the need for additional purpose built student units/houses. Any new student units should be accompanied by local facilities.</li> <li>4. It is now possible for the Council to limit the number of HMO's and this should be made part of the Council's policy to protect local housing. The rundown appearance of some of these HMO's reduces the quality of life for everyone. It is unacceptable that approximately 9,000 students live in family homes and this number is set to rise.</li> <li>5. Provision of additional residences within the university campuses has the potential to release a significant number of properties within the private rented sector thus helping to alleviate some of the wider housing issues that the District is facing.</li> <li>6. The issue of student accommodation would be better dealt with as part of a proposed new specific policy on further and higher education.</li> <li>7. Contributions from developers on affordable housing are a current national topic, and more mention of affordable housing is needed throughout the Core Strategy, together with a policy to make it clear that the Council will require such housing as a main plank of all residential development proposals, and that it will insist upon compliance with all agreements entered into.</li> <li>8. This policy should reflect the recommendations of the SHMA.</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>11</b> <b>OPEN SPACE, RECREATION AND SPORT</b></p>	<ol style="list-style-type: none"> <li>1. The Core Strategy should encourage water based recreation (unless there is a clear nature conservation conflict) where it does not conflict with other recreational uses or would harm residential or other amenity or the overall character of the area.</li> <li>2. The Core Strategy should make adequate provision for new or existing significant regional sporting venues to redevelop or expand to meet future needs.</li> <li>3. Would be useful to define “good quality” and add reference to benefits of natural green space on both biodiversity and health.</li> <li>4. Welcome the aim that states “aspire to protect and enhance the existing quality of our open space and promote its usage”. There should be more proactive and imaginative use of open spaces available to local residents for non-profit making events e.g. community concerts during the daytime, and skateboard parks. This should be recognised in the aims of CP11.</li> <li>5. The absence of open space and parks is one of the city's great weaknesses which should be emphasised. Parks would be an asset to locals and visitors.</li> </ol>

CORE POLICY	COMMENTS RECEIVED
<p style="text-align: center;"><b>12</b> <b>QUALITY OF LIFE AND ACCESS TO FACILITIES</b></p>	<ol style="list-style-type: none"> <li>1. Welcome the recognition that accessible and good quality services and facilities are essential for sustainable communities and quality of life.</li> <li>2. Support b) in seeking to achieve a fair society where increased social mobility is encouraged.</li> <li>3. Support the provision of a church to give a place of worship for new development and help provide a broader range of community services.</li> <li>4. Quality of life is unlikely to be achieved simply by offering "access to services" especially when there are no guarantees that any services will actually be provided on either of the single site developments under consideration. The policy should embrace such things as quiet, appearance and community development.</li> <li>5. Develop a standard for planning for community facilities to ensure full consultation with the key stakeholders from the outset, to ensure that the concepts generated have the highest likelihood of being accepted by the whole community.</li> <li>6. Suggest this Policy is placed more prominently as currently the ordering places tourism issues, descriptively at least, ahead of quality of life of existing communities.</li> <li>7. Encouragement of promotion of local sustainable produce would be welcomed here.</li> <li>8. This policy could be more closely linked to securing developer contributions.</li> </ol>

Table 3: main issues raised in response to Core Policies

# CHAPTER 10: IMPLEMENTATION

## CHAPTER THEME

Implementation of the Core Strategy will rely on effective delivery mechanisms, funding arrangements (including a Community Infrastructure Levy (CIL)) joint working and co-ordination with adjoining local authorities. This chapter proposes a Core Policy to oversee the implementation of the Core Strategy, support the development of a CIL and to promote the phasing of strategic development through Development Briefs or masterplan-style DPDs.

66

47 objections

12 supports

7 comments

## MAIN ISSUES RAISED

1. Securing necessary funding for infrastructure becoming increasingly important. Support CIL.
2. CIL should not go towards road improvements (including A2 slip roads) but instead towards other infrastructure including the police, social, sports and health facilities.
3. CIL should support primarily low energy sustainable transport measures and not just roads and car parks.
4. If the principles of sustainable development are to be upheld then infrastructure adequacy should determine the location of development rather than relying on funding from developers.

**Consultation Question 10**

- 1. In terms of the options identified for further testing, what additional infrastructure would be required?**
- 2. Do you agree that the CIL, or a similar mechanism is necessary to ensure that necessary infrastructure is provided in a timely fashion?**

**Responses****51**

Many of the points raised in the representations on Chapter 10 are made again in response to Consultation Question 10.

1. CIL should be used to provide sustainable transport modes, use of public transport, cycleways, and not A2 slip roads or more Park & Ride facilities
2. CIL should be used to provide social facilities, sports facilities and contributions towards policing services.
3. Support expressed for the CIL as a means of ensuring necessary infrastructure is provided in a timely manner. CIL needs to be enforceable.
4. Important that Green Infrastructure given equal importance with other infrastructure requirements
5. Development Briefs and Master Plans should be dealt with separately in the Core Strategy to CIL/Developer Contributions.
6. Important that infrastructure requirements include impact on adjoining rural areas and that funding and partner commitment are established before development starts.
7. An Infrastructure Delivery Plan is needed.
8. Need for Core Strategy to specifically state that new development will be required to make the necessary contributions towards physical and social infrastructure including education.
9. Recommend the use of Manual for Streets as a basis for creating new, and improving existing, infrastructure.

### 3. WHAT HAPPENS NEXT?

3.1 The Local Planning Authority is currently working on the evidence base for a draft Canterbury District Local Plan, to be published for consultation in the autumn of 2012. Alongside this Background Paper which examines the results of the consultation on the Options Report, the Council has been reviewing technical evidence, addressing the issues of transport and landscape, assessing the sites submitted by various developers and landowners and considering the scale and location of development that is needed in the district for the next 20 years. Work has also focused on two key studies as mentioned in Section 2 earlier - a Development Requirements Study being undertaken by Nathaniel Lichfield & Partners and public opinion research into local attitudes towards future development in the district carried out by Ipsos MORI for the Council.

3.2 It is expected that this draft Local Plan for the district will more closely resemble a single development plan document similar to those prepared before the Local Development Framework system came into place and in line with guidance in the new NPPF (see paragraphs 2.2 – 2.4 above). The Canterbury District Local Plan will

- set out the planning strategy for the district
- identify sites to meet the development needs of the area
- include policies to assist in the consideration of individual development proposals
- establish policies to protect the best of the local environment.

3.3 The Council intends to have an adopted Local Plan in place by April 2014 and the indicative timetable to secure this is set out below

DATE	STAGE
November 2012	Preferred Option (draft Local Plan) published for consultation
April 2013	Pre-submission consultation
July 2013	Submission to Planning Inspectorate/DCLG
October 2013	Examination
January 2014	Inspector's Report
April 2014	Adoption of Canterbury District Local Plan

Table 4: draft Local Plan preparation timetable

## ACKNOWLEDGEMENTS

Our thanks to Adrian Verrall and Jillian Barr of the Planning Policy Unit of Canterbury City Council for their advice and support on this Study.



# APPENDIX 1

Representations were received from the following:

## CHAPTER ONE

Dr Keith Mander	University of Kent
Mrs Denise Horswell	Clerk Blean Parish Council
Mrs Christobel Seath	Clerk Bridge Parish Council
Mr R Cheeseworth	Clerk Thanington-Without Parish Council
Mr A Hume	Hillreed Developments Limited
Mr Graham Cox	Whitstable Society
Mr Paul Watkins	
Mr M Preston	The MHP Partnership
Mr. J. Sharkey	John Sharkey and Co.
Mr Eric Parkinson	Langton and Nackington Residents Association
Professor Clive Church	Chairman Hilltop Community
Ms A Sparkes	Canterbury Conservation Advisory Committee
Mr Brian Lloyd	CPRE Kent
Mr Guy Voizey	
CLlr Nick Eden-Green	
Mr. Christopher Date	
Prof Jan Pahl	Chair Canterbury Society
Ms Debbie Salmon	Conservation Officer Policy Kent Wildlife Trust
Mr Julian Dipper	Principal Planning Officer Kent County Council
Mr Cliff Brown	
Ms Angela Maynard	
Mr Christopher Young	
Mr Simon Hewson	Hilltop Community
CLlr Hazel McCabe	
Mrs Denise Horswell	Clerk Hackington Parish Council
Dr Geoff Meaden	Chair - Canterbury branch Green Party
Mr T F Maple	
Mrs M Maple	
Mr Bob Crick	
Mr John R Brooks	
Mr Chris Smith	
Prof Grenville Hancox	
Mr J and P Booth	
Ms Elizabeth Rix	Senior Planner Dover District Council

Mr Michael Rundell	Spokesperson PACE
Mrs Julie Cox	
Mr Robert M Woods	
Mr R I Vane-Wright	
Mr Gary McInally	Chair South Canterbury Residents Association
Ms Gillian Northcott Liles	Executive Committee Oaten Hill and District Society
Mr Nick Johannsen	Director Kent Downs AONB Unit
Mr Michael Nee	
Mrs J Sheen	

## CHAPTER TWO

Mrs Denise Horswell	Clerk Blean Parish Council
Mrs Christobel Seath	Clerk Bridge Parish Council
Mrs Monica Blyth	Herne and Broomfield Parish Council
Mr A Hume	Hillreed Developments Limited
Mr Michael Steed	
Mr Graham Cox	Whitstable Society
Mr Paul Watkins	
Mr John Stebbings	Persimmon Homes
Peter Hawkes	Kent Invicta Chamber of Commerce
Mr John Archer	National Farmers Association
Mr Eric Parkinson	Langton and Nackington Residents Association
Professor Clive Church	Chairman Hilltop Community
Ms A Sparkes	Canterbury Conservation Advisory Committee
Mr Brian Lloyd	CPRE Kent
Mr Guy Voizey	
ClIr Nick Eden-Green	
Mr Jeremy Spon	
Mr Christopher Rootes	
Prof Jan Pahl	Chair Canterbury Society
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Mr Julian Dipper	Principal Planning Officer Kent County Council
Mr Cliff Brown	
Strand Lucchesi Buchan	Devine Homes
Miss Sarah Bevan	Planning Manager Berkeley Homes
Mr. Gregory Williams	
Mr Christopher Young	
ClIr Hazel McCabe	
Mrs Denise Horswell	Clerk Hackington Parish Council

Dr Geoff Meaden	Chair - Canterbury branch Green Party
Mr Bob Crick	
Mr Graham Norton	Land and Planning Director Strategic Land Kent
Mr Keith Groombridge	
Mr Robert Palmer	Chairman Petham Parish Council
Ms Elizabeth Rix	Senior Planner Dover District Council
Mr Michael Rundell	Spokesperson PACE
Mr Adam Parsons	
Dr Matthew Baxter	Head Teacher
Mr C Mills	
Ms Annette Woods	
Mr Robert M Woods	
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Mr C Laming	
Mr Geoffrey Woods	
Mr Gary McInally	Chair South Canterbury Residents Association
Ms Gillian Northcott Liles	Executive Committee Member Oaten Hill and District Society
Mr Nick Johannsen	Director Kent Downs AONB Unit
Mr Michael Nee	
Tory Family	
Mr Daniel Humphreys	Policy and Planning Officer Tourism South East
Mr Jeremy Greenway	
Mr David Frost	Parish Clerk Harbledown and Rough Common Parish Council
Dr Phil Perkins	
Mr Edward Heppenstall	Tesco
Mr Gerry Reilly	

### CHAPTER 3

MS Vicky Aston	Planning Manager Sport England
Dr Keith Mander	University of Kent
Mrs Denise Horswell	Clerk Blean Parish Council
Mrs Christobel Seath	Clerk Bridge Parish Council
Mr A Hume	Hillreed Developments Limited
Mr P Bedford	East Kent Gospel Hall Trust
Mr Paul Watkins	
Mr John Stebbings	Persimmon Homes
Mr Eric Parkinson	Langton and Nackington Residents Association
Mr Brian Lloyd	CPRE Kent
Ms Debbie Salmon	Conservation Officer Policy Kent Wildlife Trust
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Mr. Gregory Williams	
Mr Christopher Young	
Cllr Hazel McCabe	
Mrs Denise Horswell	Clerk Hackington Parish Council
Mrs Denise Horswell	Clerk Hackington Parish Council
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Mr Nick Johannsen	Director Kent Downs AONB Unit
Mr Gerry Reilly	

#### CHAPTER 4

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Mr Eric Parkinson	Langton and Nackington Residents Association
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Ms Debbie Salmon	Conservation Officer Policy Kent Wildlife Trust
Miss Jennifer Wilson	Planning Liaison Technical Specialist Environment Agency
Mr Mike Farrell	
Mr Julian Dipper	Principal Planning Officer Kent County Council
Mr B Wallis	Kent Police
Mr David Paine	GOSE
Mr Shellum	McCarthy & Stone Retirement Lifestyles Ltd
Mr. Gregory Williams	
Mrs Denise Horswell	Clerk Hackington Parish Council
Mr Taylor-Gooby	
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## CHAPTER 5

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MS Vicky Aston	Planning Manager Sport England
Mrs Monica Blyth	Herne and Broomfield Parish Council
Mr P Bedford	East Kent Gospel Hall Trust
Mr S Hall	Royal Mail
Mr Michael Steed	
Mr Graham Cox	Whitstable Society
Mrs P Proctor	Ramblers Association
	Brett Work Management Ltd
Ms Jeanne Taylor	Lee Evans Planning
Mr Paul Watkins	
Mr John Stebbings	Persimmon Homes
Peter Hawkes	Kent Invicta Chamber of Commerce
Mr. J. Sharkey	John Sharkey and Co.
Mr Eric Parkinson	Langton and Nackington Residents Association
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Mr Brian Lloyd	CPRE Kent
Mr Guy Voizey	
Mr. A. R. Finn	
Cllr Nick Eden-Green	
Dr Philip Shore	
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Mr B Wallis	Kent Police
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Wilson Quinn	
Miss Sarah Bevan	Planning Manager Berkeley Homes
Mr David Paine	GOSE
Mr Guy Dixon	The MHP Partnership
Peter Jackson	
Mr Lee Dance	South East Water
Mr Richard De Lisle	

Mr Shellum	McCarthy & Stone Retirement Lifestyles Ltd
Mr Mick Drury	Partner BDB-DESIGN
Mr. Gregory Williams	
Mr Chris Blunkell	Chris Faversham Road Residents Association
Mr Tim Wilson	
Mr Simon Hewson	Hilltop Community
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Ms Connie Long	
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Mr C Laming	
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Mr Michael Nee	
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Dr Phil Perkins	
Mr Edward Heppenstall	Tesco

## CHAPTER 6

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Mrs Christobel Seath	Clerk Bridge Parish Council

Mrs Monica Blyth	Herne and Broomfield Parish Council
Mrs S Shaw	Clerk Lower Hardres Parish Council
Mr P Bedford	East Kent Gospel Hall Trust
Mr Graham Cox	Whitstable Society
Mrs P Proctor	Ramblers Association
Mr Lionel Hoskins	
	Brett Work Management Ltd
Mr Paul Watkins	
Mr John Stebbings	Persimmon Homes
Peter Hawkes	Kent Invicta Chamber of Commerce
Mr M Preston	The MHP Partnership
Mr Steve Staines	Friends, Families and Traveller Law Reform Project
Mr. J. Sharkey	John Sharkey and Co.
Mr. David Sims	Development Analyst, Corporate Strategy Southern Water
Mr John Archer	National Farmers Association
Ms. S Scott	
Mr Eric Parkinson	Langton and Nackington Residents Association
ClIr Michael Dixey	
Ms A Sparkes	Canterbury Conservation Advisory Committee
Mr Brian Lloyd	CPRE Kent
Mr Guy Voizey	
Mr Leonard Rea	
Mr. A. R. Finn	
ClIr Nick Eden-Green	
Dr Philip Shore	
Mr Christopher Rootes	
Mrs IVD Baker	
Mr MJR Baker	
Mr J Burden	
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Miss Jennifer Wilson	Planning Liaison Technical Specialist Environment Agency
Mr Julian Dipper	Principal Planning Officer Kent County Council
Mr B Wallis	Kent Police
Mr Cliff Brown	
ClIr Ashley Clark	Secretary Friends of Duncan Downs
Rev G Manley	
Ms Angela Maynard	
Mr Little	

Mr Nigel Brown	Property Group Kent County Council
Somerlee Homes Ltd	
Strand Lucchesi Buchan	Devine Homes
Mr Ian Bull	Pentland Properties
Wilson Quinn	
Miss Sarah Bevan	Planning Manager Berkeley Homes
Mr Guy Dixon	The MHP Partnership
Peter Jackson	
Mr Andrew Hall	
Mr Lee Dance	South East Water
Mr Richard De Lisle	
Mr Mick Drury	Partner BDB-DESIGN
Mr. Gregory Williams	
Mrs O Rogerson	
Ms Bonnie Ferguson	
Mr John Marshall	
Mr Tim Wilson	
Mr Simon Hewson	Hilltop Community
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Mr John Barton	
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Ms Beatrice Shire	
Dr Matthew Baxter	Head Teacher
Mrs Dorothy Talbot	
Mr P Bloues	
Mr Robert M Woods	



Mr Bertram Leslie	
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Mr JD Colthurst	
Mr C Laming	
Petros	
Mr Michael Armstrong	
Mr Adrian Harris	Eton College
Mr Geoffrey Woods	
Mr Gary McNally	Chair South Canterbury Residents Association
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Girne American University	
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Mr J Linnane	
	Mount, Finn and Simon Wight Homes
Mr Peter Topley	
Mr Michael Nee	
Mr Nicholas Greenway	
E L Head	E L Head Ltd
Mrs Margaret Greenway	
Mr Rutgard Rumpel	
Ms Yvonne Stichbury	
Mr James Stichbury	
Mr Gary McNally	
Mr David Frost	Parish Clerk Harbledown and Rough Common Parish Council
Dr Phil Perkins	
Mr Colin Smith	
Ms Joanne Smith	
Ms Hilary Smith	
Ms Eleanor Parkinson	
Dr David Ponsonby	
Mr Gerry Reilly	

## CHAPTER 7

Mrs Christobel Seath	Clerk Bridge Parish Council
Mrs Monica Blyth	Herne and Broomfield Parish Council
Mr S Hall	Royal Mail
Mr Michael Steed	
Mr Graham Cox	Whitstable Society
Mrs P Proctor	Ramblers Association

Ms Jeanne Taylor	Lee Evans Planning
Mr Paul Watkins	
Mr John Stebbings	Persimmon Homes
Peter Hawkes	Kent Invicta Chamber of Commerce
Mr M Preston	The MHP Partnership
Mr Eric Parkinson	Langton and Nackington Residents Association
Ms A Sparkes	Canterbury Conservation Advisory Committee
Mr Brian Lloyd	CPRE Kent
Mr Guy Voizey	
Cllr Nick Eden-Green	
Mr Christopher Rootes	
Prof Jan Pahl	Chair Canterbury Society
Ms Debbie Salmon	Conservation Officer Policy Kent Wildlife Trust
Miss Jennifer Wilson	Planning Liaison Technical Specialist Environment Agency
Mr Julian Dipper	Principal Planning Officer Kent County Council
Mr Cliff Brown	
Mr Nigel Brown	Property Group Kent County Council
Somerlee Homes Ltd	
Strand Lucchesi Buchan	Devine Homes
Miss Sarah Bevan	Planning Manager Berkeley Homes
Mr Guy Dixon	The MHP Partnership
Peter Jackson	
Mr Mick Drury	Partner BDB-DESIGN
Mr Christopher Young	
Mr Simon Hewson	Hilltop Community
Mr Taylor-Gooby	
Dr Geoff Meaden	Chair - Canterbury branch Green Party
Mr Graham Norton	Land and Planning Director Strategic Land Kent
Mr Charles Wimborne	Somerlee Homes Ltd
Mr Keith Groombridge	
Mr Robert Palmer	Chairman Petham Parish Council
Ms Elizabeth Rix	Senior Planner Dover District Council
Hilltop Action Group	
Petros	
Mr Michael Armstrong	
Mr Adrian Harris	Eton College
Mr Gary McNally	Chair South Canterbury Residents Association
Mr Nick Johannsen	Director Kent Downs AONB Unit
E L Head	E L Head Ltd

Mr Gary McNally  
 Dr Phil Perkins  
 Mrs Heidi Kelly

Rydon Homes Ltd

## CHAPTER 8

Ms Vicky Aston  
 Dr Keith Mander  
 Mrs Denise Horswell  
 Mrs Christobel Seath

Mr P Hornibrook

Mrs Monica Blyth

Mrs S Shaw

Mrs Liliana Jokic

Mr R Cheeseworth

Mr A Hume

Mr S Hall

Mr Edward Palmer

Mr Michael Steed

Mr P D Sudell

Ms Carol Fido

Mr Graham Cox

Mrs P Proctor

Ms Jeanne Taylor

Mr Paul Watkins

Mr John Stebbings

Peter Hawkes

Sir / Madam

Mr M Preston

Mr. J. Sharkey

Ms. S Scott

Mrs Janet Larkinson

Mr Eric Parkinson

Professor Clive Church

Cllr Michael Dixey

Miss D. R. Manley

Mrs B Golding

Mrs Wendy Gregory

Ms Dawn Kelly

Mrs. S. A. Finn

Planning Manager Sport England

University of Kent

Clerk Blean Parish Council

Clerk Bridge Parish Council

Clerk Chartham Parish Council

Herne and Broomfield Parish Council

Clerk Lower Hardres Parish Council

Clerk Sturry Parish Council

Clerk Thanington-Without Parish Council

Hillreed Developments Limited

Royal Mail

Wincheap Allotments Association

Whitstable Society

Ramblers Association

Lee Evans Planning

Persimmon Homes

Kent Invicta Chamber of Commerce

Estates / Planning Sainsburys

The MHP Partnership

John Sharkey and Co.

Harbledown and Rough Common Parish Council

Langton and Nackington Residents Association

Chairman Hilltop Community

Rough Common W.I.



Ms A Knight  
 Mrs Margaret Wilson  
 Mr & Mrs R & E Antill  
 Dr A Teresa Hankey  
 Mr and Mrs D R Greenstreet  
 Mr. John Conway  
 Mr John Whitworth  
 Mr & Mrs Ovely  
 Mr & Mrs Hixson  
 Ms Angela Graham  
 Mrs Cooke  
 Mr & Mrs. Sayer  
 Mr Mansell Jagger  
 Mr G Dowse  
 Ms Pamela Harvey  
 Ms Joan Cuthbert  
 Dr. RJ Hendy  
 Mr. Norman Evans  
 Ms Joanna Fassum  
 Ms D. A. Roberts  
 Mr Neil Morres  
 Mr & Mrs Lawrence & Marjorie Lyle  
 Mr. J.D. Robson  
 Mrs. V Gore  
 Ms Erica Dowse  
 Mr. Christopher Date  
 B.J. Gore  
 Mr Howard Moore  
 Prof Jan Pahl  
 Ms Debbie Salmon  
 Miss Jennifer Wilson  
 Mr Mike Farrell  
 Mr Julian Dipper  
 Mr B Wallis  
 Ms Sarah Guest  
 Mr Cliff Brown  
 Cllr Ashley Clark  
 Mr Tony Couperthwaite  
 Ms Christel Moor

Highways Agency  
 Chair Canterbury Society  
 Conservation Officer Policy Kent Wildlife Trust  
 Planning Liaison Technical Specialist Environment Agency  
 Principal Planning Officer Kent County Council  
 Kent Police  
 Secretary Friends of Duncan Downs

Rev G Manley	
Ms Angela Maynard	
Mr Little	
Mr Nigel Brown	Property Group Kent County Council
Vine Family	
Somerlee Homes Ltd	
Strand Lucchesi Buchan	
Mr Ian Bull	Pentland Properties
Wilson Quinn	
Hollamby Estates & Mrs D Olley	
Hollamby Estates	
Miss Sarah Bevan	Planning Manager Berkeley Homes
Mr David Paine	GOSE
Mr Guy Dixon	The MHP Partnership
Mr Andrew Hall	
Mr Mick Drury	Partner BDB-DESIGN
Mr Christopher Ives	
Mr. Gregory Williams	
Mr Sidney Denham	
Mr & Mrs J Carpenter	
Mrs Emma Palmer	
Ms Ann Redgwell	
Ms Jane Arnott	Land Use Planning Advisor National Trust
Mr Christopher Young	
Mr David Anning	
Mrs O Rogerson	
Mr Richard Guest	
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Mr Murray Smith	
Ms Bonnie Ferguson	
W Nicoll	
Margaret and Mark Gurr	
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Mr E Small	
K A & M Foster	
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Miss E Nevell

Mr Adam Roake

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Mr Roger Howard

Mr Brian Hughes

Mrs Verity Howard

Mrs Marion Sackett

Mrs Clair Marsh

Mr Hubert Pragnell

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Mrs M Dachtler

Mr Matthew Sackett



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 Mr Harry Macdonald  
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Mr Mark Roberts

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Ms Janice Feldman

Ms Pamela Feldman

Mr & Mrs Gerry & Janet Reynolds

Dr Felicity Dunworth

Ms Frances Farrell

Ms Gerda Buckingham

Mr Andrew Birnie

Ms Elizabeth Rix

Senior Planner Dover District Council

Ms Vicky Whiting

Mr Stephen Metherell

Dr S O' Byrne

Mr Marcus Walls-Bruck

Mr Michael Rundell

Spokesperson PACE

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Mr Stephen Brooks

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Zeke Jeffrey

Dr David Wyatt





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Ms Eleanor Brown	
Mr Ed Vant	
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Mrs Geraldine Knights	
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Ms Andrea Benson	
Mr Richard McCarthy	
Mr Richard Edwards	
Dr Richard Brown	
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Mr S Griffith	
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	Mount, Finn and Simon Wight Homes
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Mr Michael Nee	

Mr Michael Lindsay-Watson

Dr Nick Riding

Mr Nicholas Greenway

Mr N C Evers

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E L Head Ltd

Mrs Margaret Greenway

Ms Lynn Lacey

Ms Lindsay McNally

Mr Liam Flavin

C Saunders

Mr Rutgard Rumpel

Kelly Navarro

Ms Katrina Walters

Ms Katharine Hughes

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Mrs J Gilling

Ms Jane Pollok

Ms Ruth Hinchliff

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Ms Kate Hinchliff  
Mr David Hinchliff  
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Miss Claire Naude  
Mr Adrian Naude  
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Mrs R Rubins  
Miss Nancy Guest

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Mr N Flanagan  
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Mr Barwick  
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Mr Peter Taylor  
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Ms Joan Cross  
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W P Hillman  
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Dr Phil Perkins  
Mr Jenner  
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Mr Andrew Jenner  
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Mr Phillip Embry  
Mrs Joyce Burt  
Mr D A Smith  
Mr Gustav Strandvik  
Mrs B A Wallis  
Mrs Hodges  
Mrs M Long  
Mr N Long

Parish Clerk Harbledown and Rough Common Parish Council

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Mrs Pauline Davis  
Ms Shelagh Cork  
Mr David Hover  
Miss Sian Jones  
Mr and Mrs Francis and Romesh Nagrath  
Mr Colin Smith  
Ms Joanne Smith  
Ms Hilary Smith  
Ms Eleanor Parkinson  
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Ms Jennifer Tyler  
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Mr Williams  
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Ms Jean Lilley  
Mr J Cousins  
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Mr Terry Davis  
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Miss G Kamson	
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Mr Harry Blows	
H S Sexton	
B Anderson	
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Mr and Mrs D Sutton	
Mrs A Hirst	
M C Marshall	
Miss J Kennison	
Mrs S Whittaker	
Mrs Brown	
Anne Hills and Gary Smith	
M and J Whitcombe	
Mr and Mrs Morton	
Mr Michael Foord	
L J Moys	
J Sharratt	
Mr and Mrs Gower	
J.B. Herbert	For: Herbert, Piperno, Pratt, Newman, David
Mrs Heidi Kelly	Rydon Homes Ltd
Reverend Michael Morris	
Mr and Mrs Hadler	
Mr Gerry Reilly	
Mr and Mrs Alan and June Vassall	

## CHAPTER 9

Ms Rose Freeman	The Theatres Trust
MS Vicky Aston	Planning Manager Sport England
Dr Keith Mander	University of Kent
Mrs Christobel Seath	Clerk Bridge Parish Council
Mrs Monica Blyth	Herne and Broomfield Parish Council
Mrs S Shaw	Clerk Lower Hardres Parish Council
Mrs Liliana Jokic	Clerk Sturry Parish Council
Mr R Cheeseworth	Clerk Thanington-Without Parish Council
Mr P Bedford	East Kent Gospel Hall Trust

Mr Michael Steed	
Mr Graham Cox	Whitstable Society
Mrs P Proctor	Ramblers Association
Ms Carolyn Wilson	Senior Planner Mono Consultants Limited
	Brett Work Management Ltd
Ms Jeanne Taylor	Lee Evans Planning
Mr Paul Watkins	
Peter Hawkes	Kent Invicta Chamber of Commerce
Mr J. Sharkey	John Sharkey and Co.
Mr David Sims	Development Analyst, Corporate Strategy Southern Water
Mr John Archer	National Farmers Association
Ms. S Scott	
Mrs Janet Larkinson	Harbledown and Rough Common Parish Council
Mr Eric Parkinson	Langton and Nackington Residents Association
Professor Clive Church	Chairman Hilltop Community
CLlr Michael Dixey	
C Smart	
Mr S Fawke	SPOKES
Ms A Sparkes	Canterbury Conservation Advisory Committee
Mr Brian Lloyd	CPRE Kent
Mr Leonard Rea	
Mr A. R. Finn	
Dr Philip Shore	
CLlr P Vickers	
K P Poole	
CLlr James Flanagan	Westgate Ward Councillors
Mrs IVD Baker	
Mr MJR Baker	
Mr & Mrs Sayer	
Mr Mansell Jagger	
Mrs V Gore	
B.J. Gore	
Mr Howard Moore	Highways Agency
Prof Jan Pahl	Chair Canterbury Society
Ms Debbie Salmon	Conservation Officer Policy Kent Wildlife Trust
Miss Jennifer Wilson	Planning Liaison Technical Specialist Environment Agency
Mr Mike Farrell	
Mr Julian Dipper	Principal Planning Officer Kent County Council
Mr B Wallis	Kent Police

Mr Dominick Veasey	Regional Planner South East England Partnership Board
Ms Sarah Guest	
Mr Cliff Brown	
Mr Tony Couperthwaite	
Strand Lucchesi Buchan	Devine Homes
Mr Ian Bull	Pentland Properties
Wilson Quinn	
Mr D Bryant and Mrs.M.Robinson	
Hollamby Estates	
Miss Sarah Bevan	Planning Manager Berkeley Homes
Mr David Paine	GOSE
Mr Guy Dixon	The MHP Partnership
Mr Lee Dance	South East Water
Mr Shellum	McCarthy & Stone Retirement Lifestyles Ltd
Mr Mick Drury	Partner BDB-DESIGN
Mr Christopher Ives	
Mr Gregory Williams	
Mr Christopher Young	
Mr Richard Guest	
Ms Rachel Jones	
Ms Helen Nicoll	
Mr Tim Wilson	
Mr Paul Barrett	Chairman Canterbury for Business
Cllr Charlotte MacCaul	
Mr Graham Robin	
Mr & Mrs PF Uden	
Cllr Hazel McCabe	
Mr Adam Roake	
Mr Tim Clark	Planning Representative Canterbury Congregation of Jehovah's Witnesses Clerk Hackington Parish Council
Mrs Denise Horswell	
Mr Craig Hartford	
Dr Geoff Meaden	Chair - Canterbury branch Green Party
Mr Roger Howard	
Mr Matthew Sackett	
Mr David Sackett	
Mr Alan Best	Swale Borough Council
Mr David Buontempo	
Mrs Alison Buontempo	
Mr Graham Norton	Land and Planning Director Strategic Land Kent

Mr J Farrier	
Ms H Farrier	
Mr Charles Wimborne	Somerlee Homes Ltd
Mr Keith Groombridge	
Ms Giulietta Holly	Natural England South East Region
Ms Pru Cherry	
Mr Steve Richards	
Mr Robert Palmer	Chairman Petham Parish Council
Mrs Lynne Couperthwaite	
Ms Shelley Serisier	Ickham Residents Action Committee
Ms Elizabeth Rix	Senior Planner Dover District Council
Mr Tim Chancellor	
Mr Adam Parsons	
Mr William Burnett	
Ms Beatrice Shire	
Mrs SPP Harman	
Mrs J Linnane	
Mr B B Miller	
Mrs Jackie Stocken	
Mr M E Bancrall	
Mr C Mills	
Mrs Dorothy Talbot	
Mr P Bloues	
Mr Edward Blain	
Mrs Julie Cox	
Mr & Mrs David and Melanie Boorman	
Mrs Lynda Day	
Ms Emma Butcher	
Ms Annette Woods	
Mr Robert M Woods	
Mr Timothy Khoury	
Mr E Holman	
Mrs L Keyte	
Mr M F Gower	
Hilltop Action Group	
Mr C Laming	
Ms Cheryl Ives	
Petros	
Mr Adrian Harris	Eton College

Mr David Greenway	
Mrs D Wells	
Mr Gary McInally	Chair South Canterbury Residents Association
Ms Erin Murphy	The London Planning Practice
Ms Gillian Northcott Liles	Executive Committee Member Oaten Hill and District Society
Mr Nick Johannsen	Director Kent Downs AONB Unit
Mr J Linnane	
Mr Peter Topley	
Mr Michael Nee	
Mr Nicholas Greenway	
Tory Family	
E L Head	E L Head Ltd
Mrs Margaret Greenway	
Mr and Mrs S and C Ainscow	
Ms Ruth Hinchliff	
Mr John Hinchliff	
Mr And Mrs J Meardon	
Mr Gary McInally	
Mrs P A Beaty	
Mr Daniel Humphreys	Policy and Planning Officer Tourism South East
Mrs Francis Davis	
Mrs S J Wraight	
Ms Patsy Higginson	
Mrs Joanne Davis	
Ms Anika Walls-Bruck	
Mr L M Robins	
Mr Andy Cross	
Mr Eric Hawkins	
Mr Eric Marsh	
Mrs Mavis Hawkins	
Mrs A Johnson	
Mr R A Jonson	
Ms Lilian Owen	
Mr Roy Owen	
Ms Mel Higginson	
Ms Veronica Pringle	
Mr Steve Walls	
Mr Lee	
Ms Barbara Markham	

Mr Jeremy Greenway  
Mr and Mrs Gilbert Lawrence  
Ms Sarah Guest  
Mr Tom Guest  
Mr Jack Guest  
Dr Craig Guest  
Miss Nancy Guest  
Mr Kenneth Guest  
Mr N Flanagan  
Ms Amelia Cross  
Ms Rebecca Anthony  
Ms Joan Cross  
Ms Ami Southon  
Mr Keith Butler  
Ms Judy Butler  
Ms Amie Butler  
Mr Ross Butler  
Mrs Marian Wood  
Mr Russell Wood  
Ms Lynne Parkinson  
Mrs M Walker  
Mrs E Ridge  
Mr Martin Stokes  
Ms P M Tyler  
Ms L K Tyler  
Mr David Frost  
Mr R S Wraight  
Mr Simon Brown  
Mrs B A Wallis  
Mrs Hodges  
Mrs M Long  
Mr N Long  
Ann Jenner  
Mrs Pauline Davis  
Ms Shelagh Cork  
Mr David Hover  
Miss Sian Jones  
Mr and Mrs Francis and Romesh Nagrath  
Mr Colin Smith

Parish Clerk Harbledown and Rough Common Parish  
Council



Ms Joanne Smith  
 Ms Hilary Smith  
 Mr Neal Mason  
 Ms Jennifer Tyler  
 Dr David Ponsonby  
 Mrs G L Jagger  
 Mrs Pat Mason  
 Mrs Gill Carlton  
 Mr David Jenner  
 Mr Tony Pringle  
 Mr Mick Hopkins  
 Mr Williams  
 Mr Gary Port  
 Ms Jean Lilley  
 Mr and Mrs Flisher  
 Mr Edward Heppenstall  
 Mrs Heidi Kelly  
 Mr John Burden

Tesco  
 Rydon Homes Ltd  
 Trustee The Crab & Winkle Line Trust

## CHAPTER 10

MS Vicky Aston	Planning Manager Sport England
Mrs Christobel Seath	Clerk Bridge Parish Council
Mrs Monica Blyth	Herne and Broomfield Parish Council
Mrs S Shaw	Clerk Lower Hardres Parish Council
Mrs P Proctor	Ramblers Association
Mr Paul Watkins	
Peter Hawkes	Kent Invicta Chamber of Commerce
Mr J. Sharkey	John Sharkey and Co.
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Mr Tony Couperthwaite	
Mr Ian Bull	Pentland Properties
Mr David Paine	GOSE
Mr Lee Dance	South East Water
Mr Mick Drury	Partner BDB-DESIGN
Mr Gregory Williams	
W Nicoll	
Mr Paul Barrett	Chairman Canterbury for Business
Mr & Mrs PF Uden	
Mrs Denise Horswell	Clerk Hackington Parish Council
Mr Taylor-Gooby	
Mr Charles Wimborne	Somerlee Homes Ltd
Mr Robert Palmer	Chairman Petham Parish Council
Mrs Lynne Couperthwaite	
Ms Elizabeth Rix	Senior Planner Dover District Council
Mr Michael Butler	
Mr C Mills	
Mrs Julie Cox	
Hilltop Action Group	
Mr David Greenway	
Mr Gary McNally	Chair South Canterbury Residents Association
Ms Gillian Northcott Liles	Executive Committee Member Oaten Hill and District Society
Mr Michael Nee	
Mr Nicholas Greenway	
Mrs Margaret Greenway	
Mr Gary McNally	
Mr Jeremy Greenway	
Dr Phil Perkins	
Dr David Ponsonby	