

Canterbury City Council

Planning and Regeneration

Canterbury District Local Plan

Publication Draft June 2014

Consultation Statement

Consultation summary June 2013 to date



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Consultation undertaken to inform preparation of the Canterbury District Local Plan Publication Draft

1. Introduction

The Planning and Compulsory Purchase Act gave Local Authorities the responsibility to produce a Local Development Framework. At a national level a new National Planning Policy Framework (the NPPF) was published and brought into force in March 2012 and the National Planning Practice Guidance (NPPG) in April 2014. The National Planning Policy Framework 2012 recommends that each local planning authority produce a local plan for its area that contributes to sustainable development while reflecting the vision and aspirations of local communities. Also at a national level the Localism Act was passed in November 2011 the Act aims to make the planning system clearer, more democratic and more effective, highlighting a return to a single Local Plan to guide development. Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 outlines the public consultation process.

The Canterbury District Local Plan will become the statutory Development Plan for the District. Once completed, the Local Plan will set out the Council's long term planning strategy for the area up to 2031.

This Consultation Statement outlines the consultation undertaken during the preparation of the Publication Draft of the Canterbury District Local Plan. It runs on from the consultation statement prepared in June 2013 for the Preferred Option Consultation Draft of the Canterbury District Local Plan. It has been prepared to clarify the consultation process to date, to indicate the range of consultees involved in the process and to show how the Local Plan Publication Draft responds to the consultation to date. It also shows how consultation has been undertaken in line with the Council's Statement of Community Involvement 2007 (SCI).

2. Canterbury District Local Plan Preferred Option Consultation Draft June 2013 and sustainability appraisal consultation

In June 2013 Canterbury City Council put out for consultation the Local Plan Preferred Option Consultation Draft, its sustainability appraisal and the Canterbury Landscape Character and Biodiversity Appraisal. The production of these documents was based on a substantial evidence base and consultation as outlined in the LDF Core Strategy Options Stage Consultation Statement 2010 and the Local Plan Preferred Option Consultation Draft Consultation Statement June 2013.

The Canterbury District Local Plan Preferred Option Consultation draft responded to changes in legislation and was informed by numerous background studies including:

- Futures Study and review (Experian in 2006 & 2011)
- Canterbury Development Requirements Study (2012), by Nathaniel Lichfield & Partners
- Canterbury Future Development Research (2012) (Ipsos MORI)
- Habitats Regulations Assessment (2010)
- SHLAA Report and Sustainability Appraisal
- Strategic Housing Market Assessment (2009)
- Canterbury Retail and Leisure Study (2011)
- Canterbury District Employment Land Review 2011-2031 (2013)
- Local Transport Plan for Kent (2011 – 2016)
- Local Plan Viability Assessment (2012)
- Strategic Flood Risk Assessment

The full list and links to the documents are available on the Canterbury City Council Planning Policy website at <https://www.canterbury.gov.uk/planning/planning-policy/background-documents/>.

The document also responded to the issues raised in the responses to the consultation on the Options Report (Representations Analysis of the Draft Core Strategy Options Report (2012)).

The aim of the Local Plan Preferred Option Consultation Draft was to set out the Council's vision for the district to 2031 and provide certainty to local people and developers with respect to positive planning for the district. The document puts meeting the needs of local people, creating places where people want to live and work and securing prosperity of the district at the heart of its policies. The Preferred Option draft was set out across 12 chapters, 160 planning policies and 8 strategic sites, which would guide development across the district for the next 18 years. The consultation aimed to seek the public's views on the future direction for development in Canterbury District until 2031.

Prior to public consultation the documents were seen and approved by the following Council committees: Scrutiny and Audit Committee on 6 June and Executive Committee 30 May 2013.

The formal consultation period for these documents ran for 10 weeks from 20 June 2013 until 30 August 2013. Statutory consultees, those identified in the SCI, community and voluntary groups, Councillors and residents and interested parties who had been involved or expressed an interest in the preparation of the Preferred Option Draft were informed directly by letter or email (Appendix 1).

A Public Notice was placed in the local press on 23 June 2014, along with adverts, information leaflets, posters and a feature article in District Life (Appendix 2).

The documents were available from the Planning Policy Team and during opening hours at:

- Canterbury City Council (main office), Military Road, Canterbury;
- Herne Bay (divisional office), William Street, Herne Bay;
- Canterbury Library, 35 Pound Lane, Canterbury;
- Herne Bay Library, 124 High Street, Herne Bay;
- Sturry Library, Chafy Crescent, Sturry, Canterbury;
- Swalecliffe Library, 78 Herne Bay Road, Swalecliffe;
- Whitstable Library, 31-33 Oxford Street, Whitstable;
- The Mobile Library;
- KCC Offices, Invicta House, Maidstone; and,
- On the Planning Policy website www.canterbury.gov.uk/planningpolicy
- For comment on-line the Council's consultation web-site <http://canterbury-consult.limehouse.co.uk/portal>.

Representation Forms were available at all the venues, from the Planning Policy Website <http://www.canterbury.gov.uk/planningpolicy> or on request from the Planning Policy Team (Appendix 1). A consultation alert was placed on the Council's main home page www.canterbury.gov.uk. Representations could also be made online directly through a link on the Planning Policy Web page http://canterbury-consult.limehouse.co.uk/portal/preferred-options-2013/cdlp_preferred_option_2013.

Summary and information leaflets were made available at all venues, information posters were produced and distributed and a feature article placed in the Summer 2013 copy of the Council's publication *District Life* which is distributed to every household in the District, alerting residents to the publication of the Canterbury District Local Plan Preferred Option Consultation Draft and that it was available for public comment as well as where to see it and how to comment. The production of the document and its consultation were also well covered by the local press in the

lead up to the consultation. A copy of the District Life Article, forms, posters, notices and adverts are reproduced at Appendix 2.

Comments were invited and received, online (10%), by email using an electronic version of the representation form, and by post using the representation form. The Council also received numerous letters (31%) and emails (58%), with views on the Preferred Option draft, that did not use the format of the representation form. Such submissions were inputted into the database by Council Officers, against the relevant chapters, paragraphs and policies.

During this period a total of 6996 representations were received from 1331 individuals, statutory consultees, agencies and organisations. Ninety percent of the comments received were from local residents. Representation coverage of the plan was comprehensive with all polices receiving comments. However, comments focussed on the chapters relating to strategy (1), transport (5) and housing (2), which received 37%, 16% and 12% of the comments respectively. It should also be noted that one in three representations supported the policies and allocations.

The representations were correlated and analysed by Catherine Hughes Associates who provided a comprehensive report on the main issues and comments "*Canterbury District Preferred Option Consultation draft, Representation Analysis, February 2014*". The analysis outlines the main issues and comments, the numbers of comments objecting to and in support of each paragraph, policy and chapter. This feedback provided the scope of community opinion, which fed into, and informed changes to, the Local Plan Publication Draft. The main issues have been summarised in a table along with the Council's responses to the primary points raised (see Appendix 3).

3. Consultation and Meetings with stakeholder groups to inform the Local Plan Publication Draft

Since the conclusion of the Local Plan Preferred Option Draft consultation, Council Officers have met and consulted with a range of stakeholders, stakeholder groups, including statutory organisations and individuals to seek to inform the development of the Publication Draft of the Local Plan.

In addition, there have had a series of meetings with statutory consultees and interested parties to discuss key issues, including Kent County Council (education; transport; community infrastructure; employment and population issues); Environment Agency (flood risk); Highways Agency (transport issues); Southern Water Services (water supply and sewerage issues); South East Water (water supply); Natural England (biodiversity and SSSI); NHS Trusts (future health requirements), National Grid, local stakeholders, local developers, local universities and schools, .

A list of these meetings, those involved and the matters covered at those meetings, is included in Appendix 4.

4. Duty to Co-operate / Evidence Base consultation

Section 110 of the Localism Act sets out the duty to co-operate, this applies to all local planning authorities and a number of other bodies. Paragraphs 178 to 181 of the National Planning Policy Framework give guidance on planning strategically across local boundaries and highlight the importance of joint working to meet requirements that cannot be wholly met within a single local planning area through joint working, polices and plans. The duty to co-operate covers a number of public bodies in addition to Councils. These bodies are required to co-operate with Council's on issues of common concern to develop sound plans. Discussions with these organisations are ongoing.

- Environment Agency
- Homes and Communities Agency
- Communities and Local Government
- Historic Buildings and Monument Commission for England (English Heritage)
- Natural England
- Office of Rail regulation
- Network Rail Infrastructure Limited
- Highways Agency
- Civil Aviation Authority
- Marine Management Organisations
- Primary Care Trust
- Home Builders Federation
- Service Providers (including water, sewage, electricity, gas and telecommunications)

Over the past decade the Council has worked with and will continue to work with Local Authorities in East Kent including Kent County Council and other partners to develop a long-term vision for the area as well as mechanisms for developing that vision including local plans. The Council has become part of and helped set up a number of organisations. In the process of developing the evidence base and writing the Local Plan, the Council has also consulted with and briefed a number of adjacent authorities and other organisations. The organisations that the Council is part of and has on-going discussions with include:

- Kent County Council
- Thanet District Council
- Dover District Council
- Shepway District Council
- Swale Borough Council
- Ashford Borough Council
- Local Enterprise Partnership
- Kent Planning Officers Group
- Kent Planning Policy Forum
- East Kent Chief Executives Forum
- East Kent Local Planning Authorities
- East Kent Local Strategic Partnership
- East Kent Regeneration Board
- East Kent Green Infrastructure Partnership
- Parish Councils
- Local Housing Associations
- Local education institutions
- Environmental and amenity groups
- Canterbury District Transport Steering Group

The Council has proactively sought to have discussions with relevant organisations at appropriate stages of plan development. A list of the meetings held and the matters discussed at those meetings is included in the list at Appendix 4. Details of all the groups the Council is part of and the organisations, bodies and stakeholders consulted with under the duty to co-operate and those to be consulted with are in the Council's Annual Monitoring Reports and the Statement of Community Involvement (2007).

5. Council Members

Local Plan Steering Group (an advisory group for the Council's Executive) is a multi-party member group that has been responsible for overseeing the production of the Local Plan. They have met to consider and decide on all aspects of the Local Plan and its evidence base. The list of meetings is attached at Appendix 5.

A Council Member's briefing on the Local Plan Publication Draft was held on 11 March 2014. Members received a briefing on the next steps of the Local Plan process, before Committees formally considered it. This included a summary of the comments received during the Preferred Options Draft consultation; an analysis of the main issues arising from the consultation; a review of the evidence base; advice given by an advisory Inspector; proposed changes being recommended by officers and the next steps in the Local Plan process towards Examination.

6. Consideration by Council Committees

The Canterbury District Local Plan Publication Draft was considered by the Council's Overview Committee on 2 April 2014 and by the Council's Executive on 10 April 2014 (A copy of the Committee Report and the minutes is attached at Appendix 6). It was approved for consultation by Council on 24 April 2014. Links to the committee reports and the minutes is included in Appendix 6.

APPENDIX 1

Preferred Option Consultation Draft Consultation - notifications

Letters, Forms, Emails.

Example general letter

Date: 19.06.13
Your Ref:
Our Ref: LP/POC/GEN
Ask for: Planning Policy
Direct dial: **01227 862199**
Direct fax:
E-mail: planning.policy@canterbury.gov.uk

«Title» «Given_Name» «Family_Name»
«Company__Organisation»
«Address_Line_1»
«Address_Line_2»
«Address_Line_3»
«Post_Town»
«Post_Code»

Dear Consultee,

Canterbury District Local Plan Preferred Option Consultation Draft

I am writing to inform you that the Canterbury District Local Plan Preferred Option Consultation Draft June 2013, Sustainability Appraisal and Canterbury Landscape Character and Biodiversity Assessment will be out for public consultation from 20 June 2013 until 5pm Friday 30 August. All comments need to be received by this date as the City Council may not be able to consider comments received after 5pm 30 August.

The Local Plan will provide the overall spatial development strategy for the Canterbury District up to 2031 and will set the levels of development required. Copies of these documents together with other supporting documents can be viewed at the council's website <https://www.canterbury.gov.uk/planning/planning-policy/> and during normal office hours at the following locations:

- Canterbury City Council (Main Office) Military Road Canterbury 8.30am-5pm
- Herne Bay Divisional Office, William Street, Herne Bay 8.45am-4.45pm

Copies are also available to view during normal opening hours at:

- Canterbury Library – The Beaney, High Street, Canterbury
- Herne Bay Library – 124 High Street, Herne Bay
- Sturry Library – Chafy Crescent, Sturry
- Swalecliffe Library – 78 Herne Bay Road, Swalecliffe
- Whitstable Library – 31-33 Oxford Street, Whitstable
- The mobile Library

Comments can be made

- online at <http://canterbury-consult.objective.co.uk/portal> or
- by completing the comments form and emailing to planning.policy@canterbury.gov.uk or by post to Planning Policy Team, Canterbury City Council, Military Road, Canterbury CT1 1YW.

If you wish to purchase copies of the documents please contact the planning policy team, the costs are set out below:

- Canterbury District Local Plan Preferred Options Consultation Draft £50 and £35 for local residents (on production of proof of local address)
- Sustainability Appraisal Non-Technical Summary £10
- Landscape Character and Biodiversity Appraisal CD - £25, hard copy £50

For other background documents please contact the planning policy team.

We will keep you informed about the preparation of our Local Plan and other related planning documents that we produce. On occasions we may share your contact details with other departments within the Council so that they can tell you about other consultations or information that might interest you. If you **do not** want to receive any information from Canterbury City Council, other than that relating to the Local Plan and related planning documents, then please email planning.policy@canterbury.gov.uk .

If you have queries regarding this consultation then please contact the planning policy team on 01227 862199 or by emailing planning.policy@canterbury.gov.uk

Yours faithfully

Adrian Verrall

Mr Adrian Verrall
Planning Policy Manager
Planning and Regeneration

Example statutory letter

Date: 19.06.13
Your Ref:
Our Ref: LP/POC/stats2/DCs
Ask for: Planning Policy
Direct dial: **01227 862199**
Direct fax:
E-mail: planning.policy@canterbury.gov.uk

«title» «firstname» «surname»
«organisation»
«addr1»
«addr2»
«town»
«postcode»

Dear Consultee,

Canterbury District Local Plan Preferred Option Consultation Draft

I am writing to inform you that the City Council is now consulting on the Canterbury District Local Plan Preferred Option Consultation Draft June 2013, Sustainability Appraisal and Canterbury Landscape Character and Biodiversity Assessment. Electronic copies of the documents can be found on the enclosed CD.

The public consultation period will run from 20 June 2013 until 5pm Friday 30 August. All comments need to be received by this date as the City Council may not be able to consider comments received after 5pm 30 August.

Copies of these documents together with other supporting documents can be viewed at the council's website <https://www.canterbury.gov.uk/planning/planning-policy/> and during normal office hours at the following locations:

- Canterbury City Council (Main Office) Military Road Canterbury 8.30am-5pm
- Herne Bay Divisional Office, William Street, Herne Bay 8.45am-4.45pm

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- by completing the comments form and emailing to planning.policy@canterbury.gov.uk or by post to Planning Policy Team, Canterbury City Council, Military Road, Canterbury CT1 1YW.

If you wish to purchase additional copies of the documents please contact the planning policy team, the costs are set out below:

- Canterbury District Local Plan Preferred Options Consultation Draft £50 and £35 for local residents (on production of proof of local address)
- Sustainability Appraisal Non-Technical Summary £10
- Landscape Character and Biodiversity Appraisal CD - £25, hard copy £50

For other background documents please contact the planning policy team.

We will keep you informed about the preparation of our Local Plan and other related planning documents that we produce. On occasions we may share your contact details with other departments within the Council so that they can tell you about other consultations or information that might interest you. If you **do not** want to receive any information from Canterbury City Council, other than that relating to the Local Plan and other planning documents, then please email planning.policy@canterbury.gov.uk .

If you have queries regarding this consultation then please contact the planning policy team on 01227 862199 or by emailing planning.policy@canterbury.gov.uk

Yours faithfully

Adrian Verrall

Mr Adrian Verrall
Planning Policy Manager
Planning and Regeneration

General email

Dear Consultee,

Canterbury District Local Plan Preferred Option Consultation Draft

I am writing to inform you that the Canterbury District Local Plan Preferred Option Consultation Draft June 2013, Sustainability Appraisal and Canterbury Landscape Character and Biodiversity Assessment will be out for public consultation from 20 June 2013 until 5pm Friday 30 August. All comments need to be received by this date as the City Council may not be able to consider comments received after 5pm 30 August.

The Local Plan will provide the overall spatial development strategy for the Canterbury District up to 2031 and will set the levels of development required. Copies of these documents together with other supporting documents can be viewed at the council's website <https://www.canterbury.gov.uk/planning/planning-policy/> and during normal office hours at the following locations:

- Canterbury City Council (Main Office) Military Road Canterbury 8.30am-5pm
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- Herne Bay Library – 124 High Street, Herne Bay
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- Whitstable Library – 31-33 Oxford Street, Whitstable
- The mobile Library

Comments can be made

- online at <http://canterbury-consult.objective.co.uk/portal> or
- by completing the comments form and emailing to planning.policy@canterbury.gov.uk or by post to Planning Policy Team, Canterbury City Council, Military Road, Canterbury CT1 1YW.

If you wish to purchase copies of the documents please contact the planning policy team, the costs are set out below:

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- Landscape Character and Biodiversity Appraisal CD - £25, hard copy £50

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If you have queries regarding this consultation then please contact the planning policy team on 01227 862199 or by emailing planning.policy@canterbury.gov.uk

Yours faithfully

Adrian Verrall

Mr Adrian Verrall
Planning Policy Manager
Planning and Regeneration

Comments Form

For official use only

Reference number:

Comment number:

Canterbury District Local Plan Preferred Option Draft 2013

Comments Form

June 2013

Why not submit your comments on line at <http://canterbury-consult.objective.co.uk/portal> it's easy to use and it will keep you informed of the process.

Alternatively, use this form to set out your comments on the Local Plan Preferred Option Draft 2013, using a separate sheet for each representation. You may photocopy this form or obtain further copies free of charge from the Planning Policy team on **01227 862 199** or via the website www.canterbury.gov.uk/planning-policy All comments received are available for public inspection and therefore **cannot** be treated as confidential.

Section 1: Contact details	
Name:	Address:
Organisation (if applicable):	
Phone:	
Email:	Representing:
Agent's name:	Agent's address:

Please read the guidance notes on the reverse of this form, before completing.

Please return all completed forms by **5pm** on **30 August 2013** to Planning Policy Team, Planning and Regeneration, Canterbury City Council, Military Road, Canterbury, CT1 1YW

Email: planning.policy@canterbury.gov.uk

Online submission at <http://canterbury-consult.objective.co.uk/portal>

or via www.canterbury.gov.uk/planning-policy



Which policy, paragraph or appendix are you commenting on?

Question 1

Are you supporting or objecting to this policy, paragraph or appendix?

- Supporting Objecting

If your comment at Question 1, relates to a Strategic Development Site, (SP3) please select from the list below (please select one answer)

- Site 1: South Canterbury
- Site 2: Land at Sturry/Broad Oak
- Site 3: Hillborough Site, Herne Bay
- Site 4: Herne Bay Golf Club
- Site 5: Strode Farm, Herne Bay
- Site 6: Land at Greenhill, Herne Bay
- Site 7: Thanet Way Site, Whitstable
- Site 8: Land north of Hersden
- Other

If other, please enter details such as site name, location and proposed use.

Question 2

Detailed comments

Please state fully and clearly the reasons for your support or objection to this policy, paragraph or appendix. You may continue on a separate piece of paper if necessary.

Please provide a summary of no more than 100 words if your main submission is more than 500 words.

Question 3

Changes sought

If objecting, please state what change you are seeking, which could resolve your objection.

Thank you for your comments. We will keep you informed about the preparation of our Local Plan and other related planning documents that we produce. On occasions we may share your contact details with other departments in the council so that they can tell you about other consultations or information that might interest you.

Please tick this box if you do not want to receive any information from Canterbury City Council, other than that relating to the Local Plan and related planning documents.

Canterbury District Local Plan Preferred Options Draft June 2013

Guidance notes for completing the comments form

General

1. The public consultation period runs from **20 June 2013** to **5pm 30 August 2013**. The city council **may not** be able to consider representations received **after** this date. Copies of the documents can be viewed at the council's offices and libraries in Canterbury, Herne Bay, Whitstable, Swalecliffe, Sturry and the mobile Library and online via the council's website.
2. Please use a separate comments form for each comment. The forms may be copied or alternatively contact the Planning Policy Team on 01227 862 199 to arrange further copies, or they may be downloaded from the website.
3. Representations can be submitted in the following ways by the due date and carry equal weight:
 - Online at <http://canterbury-consult.objective.co.uk/portal> or via the council's website www.canterbury.gov.uk/planning-policy
 - By downloading the comments form from www.canterbury.gov.uk/planning-policy
 - By using the paper comment form available from the council offices/libraries
 - By email using the planning.policy@canterbury.gov.uk address
4. All representations received are available for public inspection and therefore **cannot** be treated as **confidential**. All comments will be available to view online once they have been processed.

Contact details

5. Please complete the contact details, as this will enable the city council to notify you of other consultations in connection with the Local Plan.
6. Where an agent is representing a client or local group this must be clearly stated.

Nature of representation

7. Please indicate clearly the policy or paragraph to which your representation relates and whether you are in support or objecting and indicate the change you are seeking which could resolve your comment.

Please return all completed forms by **5pm on 30 August 2013** to Planning Policy Team, Planning and Regeneration, Canterbury City Council, Military Road, Canterbury, CT1 1YW

Email: planning.policy@canterbury.gov.uk

Online submission at <http://canterbury-consult.objective.co.uk/portal>
or via www.canterbury.gov.uk/planning-policy

Preferred Option Consultation Draft Consultation - public information

District Life Articles, Notices, Posters and Leaflets.

Press notice for Preferred Option Consultation Draft

Public Notice

23 June 2013



Planning and Compulsory Purchase Act 2004

Town and Country Planning (Local Planning) (England) Regulations 2012 No 767

Regulation 18 – Notice of the publication of:

- Canterbury District Local Plan Preferred Options Consultation Draft June 2013
- Sustainability Appraisal
- Canterbury Landscape Character and Biodiversity Appraisal

The Local Plan will provide the overall spatial development strategy for the Canterbury District up to 2031. The City Council is inviting members of the public to view and comment on these documents between 20 June and 5pm 30 August 2013.

Copies of the Local Plan, Sustainability Appraisal and the Canterbury Landscape Character and Biodiversity Appraisal along with other supporting documents can be viewed at the Council's website www.canterbury.gov.uk/planning/planning-policy and during normal office hours at the following locations:

Canterbury City Council (Main Office) Military Road, Canterbury	8.30am to 5 pm
Herne Bay Divisional Office, William Street, Herne Bay	8.45am to 4.45pm

Copies are also available to view at:

- Canterbury Library – The Beaney, High Street, Canterbury
- Herne Bay Library – 124 High Street, Herne Bay
- Sturry Library – Chafy Crescent, Sturry
- Swalecliffe Library – 78 Herne Bay Road, Swalecliffe
- Whitstable Library – 31-33 Oxford Street, Whitstable
- The mobile library

Comments can be made:

- online at <http://canterbury-consult.objective.co.uk/portal> or
- by email to planning.policy@canterbury.gov.uk using the downloadable comments form or by post to Planning Policy Team, Canterbury City Council, Military Road, Canterbury CT1 1YW.

All comments relating to Canterbury District Local Plan Preferred Option, Sustainability Appraisal or the Landscape Character and Biodiversity Appraisal must be received by 5pm 30 August 2013. The City Council may not be able to consider representations received after this date.

Further information can be obtained from the planning policy team on 01227 862 199 or by emailing planning.policy@canterbury.gov.uk

Local Plan
A vision for our district

We're preparing a Local Plan that sets out how we will plan for the future of our district - for homes, jobs, countryside, shops and leisure facilities.

To have your say on your district in 2031 visit our website or see the plans in your council offices or libraries.

www.canterbury.gov.uk/localplan
PeoplePlacesProsperity

CANTERBURY CITY COUNCIL

QR code

Example of press article
From Kentish Gazette 9 May 2013

Newdesk: 01227 475985 www.kentonline.co.uk Thursday, May 9, 2013 (WG) 5

LOCAL PLAN: FOUR-PAGE SPECIAL REPORT

DEVELOPMENT: How will Canterbury look in the future if plans for new homes go ahead?
Picture: Martin Apps FM2582801

Council leader: 15,000 new homes or face a free-for-all nightmare

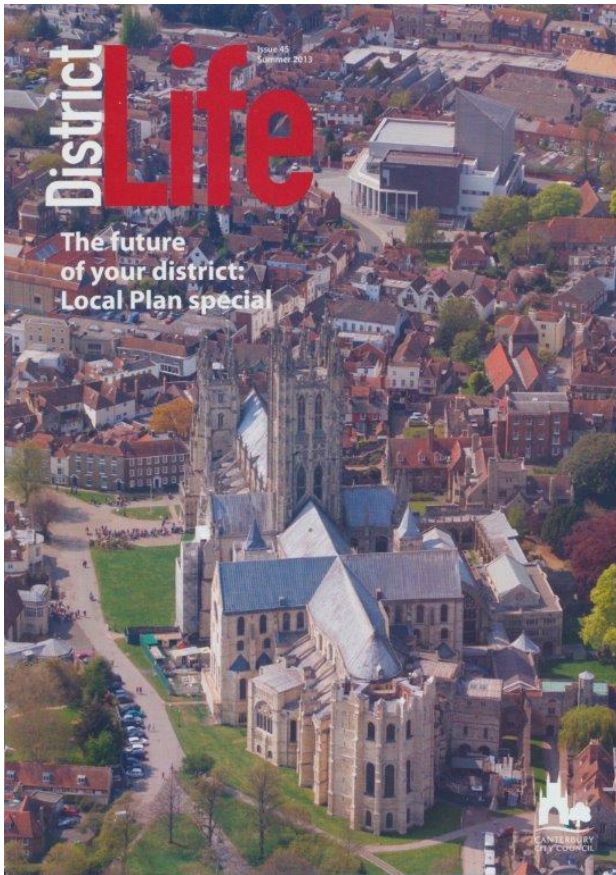
breast cancer care Pink Ribbonwalk
in association with womanathome
Leeds Castle 8th June
Walk 10 or 20 miles through beautiful countryside and help change lives
Register at www.pinkribbonwalk.org.uk

INTERIOR HOME DESIGNS OF ROSSENDALE
Solid Oak Framed Kitchen For Sale!!
All still boxed and guaranteed, includes oven, hob, stainless chimney hood, fridge, wine cooler, sink, tap and worktops.
Should cost £3,000 will accept £795
Please telephone: 02030022980 / 07512694947
Please quote JNKS when calling

GARAGE DOORS CRAZY SALE MADNESS
Top of the range 'remote controlled' insulated aluminium rolling garage door, superb product maintenance free.
Totally secure and fully guaranteed, RRP £2,155.00
NOW JUST £699 INC VAT & FITTED FREE!!
TO SEE THIS 'SEGURO' DOOR WITHOUT ANY OBLIGATION
TEL: 01622 765993 REF: RPS
Contact our office for 'FREE FITTING OFFER'
www.segurogaragedoors.co.uk

WANT TO LOSE WEIGHT?
SAVE £15 SEE WEBSITE
Our doctors have been helping people (MALE & FEMALE) to lose weight for nearly 30 years. Weight loss is not just cosmetic, it is an improvement in your healthy well-being.
START NOW by calling 01622 685434 MAIDSTONE Kings Private Clinics

District Life Summer 2013
 Delivered to every household in the District



Leader's column



It's a crucial time for the district as we head towards some key decisions that will affect how the city, towns and villages will develop and change over the next 15 to 20 years, and I am going to use this edition's column to set out my administration's approach.

I think everyone would agree that the district is a very special place to live and work in, and to enjoy our precious leisure time in, with a mix of beautiful coast and countryside and thriving urban areas. It is understandable why it is increasingly a magnet for families wanting to settle here - and the question is how we can ensure that continues for years to come.

We want to create a district that supports jobs and creates wealth. I am working on the Regional Growth Fund given to East Kent and at the time of writing we have allocated £18m (out of £35.5m) in grants and loans to 54 companies in financial need. Twenty-two of these are in the Canterbury district.

We also want to provide good quality homes for families to live in. And with that must come improvements in all the facilities that people need, such as schools, roads and open space.

Our Local Plan, once approved, will be the basis for planning decisions taken during the next 15 years. It is vital that we have a plan, because without one, development will still happen, but we will have much less control over how it happens.

By leading this process and ensuring we have a sustainable and robust vision for the future, we can get the best results for local people.

You will see on the next three pages that we are proposing development at eight key locations. Sites are being put forward in all the main three urban areas, along with limited development in the villages.

We know that people living in these locations will be concerned about what is being proposed. We are committed to working with residents in these areas, and across the district, to create proper communities and garden city environments.

The draft plan goes out to consultation in the middle of June. Ipsos MORI has already carried out public opinion research in order to understand the level of house building that would be generally acceptable to residents, and the draft plan is broadly in line with the findings of that research.

Once the plan is officially released, everybody should give us their views. Have a look at the information here in District Life and the full plan that will be on the website and in libraries shortly and tell us what you think.

We're talking about the future of your district. The decisions we make now could affect your lives for years to come.

Cllr John Gilbey, Leader, Canterbury City Council

Draft Local Plan out to public consultation

Public consultation on the city council's draft Local Plan will start later this month (June) and local residents are being urged to make their views known.

The plan sets out a vision for the Canterbury district and how it will develop up to 2031. It is an important document as it will guide developments and be the official blueprint covering homes, businesses, shops, leisure facilities, countryside - in fact, everything that contributes to how people live, work, travel and spend their time in the district.

It also continues the council's commitment, already established and implemented in its last two Local Plans, to protecting the best of the district's built and natural environment.

This includes supporting the protection and proper management of Canterbury's World Heritage Site, listed buildings and conservation areas, seeking to protect sites that are important for nature conservation, including national and international wildlife sites, such as Stodmarsh, the Blean and the coastal areas, and encouraging good design in all new development, as well as high environmental standards and good internal space in new homes.

And alongside the draft plan, the council is publishing for consultation its Landscape Character and Biodiversity Appraisal, which aims to protect sensitive landscapes and encourage the protection and extension of our wildlife and habitat network. This gives long-term protection to the Kent Downs Area of Outstanding Natural Beauty, which covers almost one-third of the district.

In putting the draft plan together, the council's aim has been to create a district that supports the creation of jobs and wealth and can be a place where residents live in homes they can afford and want to live in.

This approach is backed up by developing the necessary infrastructure, such as roads, schools and medical facilities, safeguarding the environment and ensuring that change is made in a sustainable way.

To get to this point, the council has carried out a number of

studies and research to work out what development is needed and assess the impact of the proposals. Major public opinion research last year sought the views of residents on a range of development options for the district.

The draft plan takes into account the outcome of these studies and local views, while ensuring that the council meets its national planning requirements.

All the studies demonstrated that to achieve the vision, an increase in development, both residential and business space, along with additional public open space, is required.

As a result, the previous figure set out in the earlier South East Plan of 510 new homes a year will no longer be enough to lead to economic growth and increase in employment.

The studies concluded that a supply of 780 new homes a year, together with employment land, are needed each year up to 2031. This figure would meet employment and affordable housing requirements.

Where new development is built, the council will plan to create new sustainable communities involving a mix of housing, open space and public facilities. They will be planned in consultation with those organisations responsible for schools, medical facilities and roads.

Taking into account transport links, public facilities and employment opportunities, the studies recommended that new housing development should primarily be located in urban areas of the district, with some limited development in the larger villages.

The council is proposing development in a smaller number of large sites instead of a scattergun approach of lots of smaller sites. This will allow for the creation of proper communities in 'garden city'-style developments.

Eight principal areas have been identified for development and some of these are explained in more detail over the next two pages.

The eight sites are:

- South Canterbury** - 4,000 homes, 70,000 square metres of employment space in a business park, community facilities, open space, new A2 junction, fast bus link to the city centre and a 'green gap' to Bridge
- Sturry/Broad Oak** - 1,000 homes, local business space, community facilities, open space, new bypass of the rail crossing and the possible closure of existing rail crossing points
- Hillborough, Herne Bay** - 1,000 homes, 33,000 square metres of employment space, community facilities and road improvements to the Thanet Way
- Herne Bay Golf Club** - 400 homes, commercial property, sports and leisure facilities and new secondary school space
- Strode Farm, Herne** - 800 homes, 15,000 square metres of employment space, local shopping, community facilities and a relief road for Herne village
- Greenhill, Herne Bay** - 600 homes, community facilities and new allotments
- Next to Thanet Way, Whitstable** - 400 homes, major extension to Duncan Down and open space including allotments
- Land north of Hersden** - 800 homes, new business space and community facilities

Public consultation

More than 1,000 local people have already had the chance to help shape the plan at meetings with residents' groups and through independent research led by Ipsos MORI.

Public consultation on the draft plan runs from 14 June to 16 August. Following that, all the comments will be considered and the plan amended accordingly.

There will then be further consultation in early 2014 ahead of a full independent public inquiry led by a government inspector during summer 2014 before the plan is approved in early 2015. Full information is available on the council's website at www.canterbury.gov.uk.

Copies of the plan will also be in libraries and at the council's offices across the district.



Local residents get involved in a Local Plan workshop last year discussing the future development of the district.

Key Local Plan proposed sites:

South Canterbury

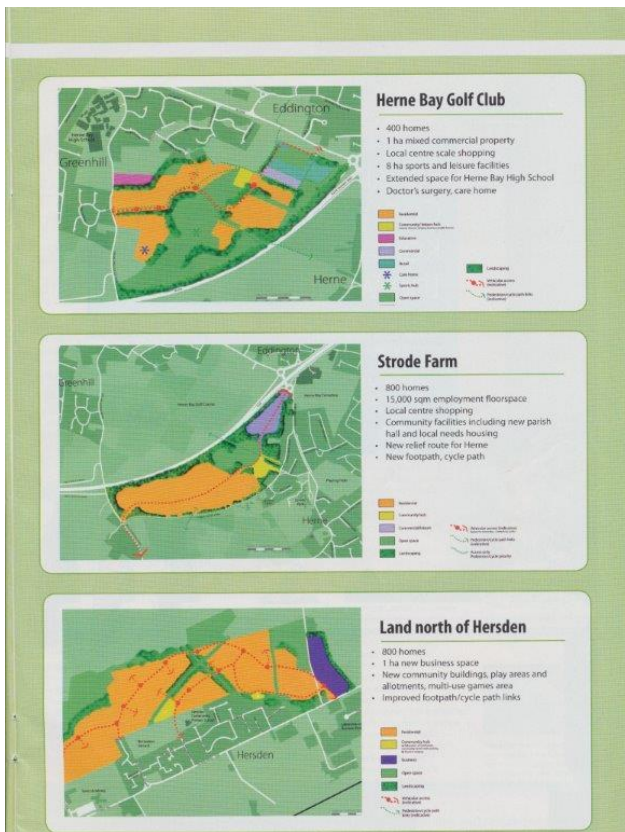


- 4,000 homes
- 70,000 sqm employment space
- Local centre shopping
- Community hub, primary school, doctor, extended park and ride, combined heat and power facility, 30ha new public open space including allotments, 20ha new woodland planting
- New A2 junction and fast bus link to the city centre

Land at Sturry/Broad Oak



- 1,000 homes
- Business floorspace for local business space
- Local centre scale shopping
- Community facilities to be determined with parish council
- Protection of remaining ancient woodland
- New open space, public gardens and playing fields
- New Sturry crossing bridge, closure/partial closure of crossings at Broad Oak and Sturry, closure of existing rail foot crossings, new car park for Sturry Station



District Life Winter 2013

Thousands give their views on the draft Local Plan

In the last edition of *District Life*, we included information about the council's draft Local Plan and showed some of the key development sites for the district.

The consultation on the draft plan closed at the end of August and the council received around 5,800 comments from about 1,300 individuals or organisations. It is hoped that all the comments will be available shortly to view on the council's website and in paper copy at the council offices in Canterbury.

Many of these comments (over 1,200) relate to the level of development proposed in the draft plan, and the proposed new

development sites.

Many argued that the overall level of new development for the district is set too high, but some organisations equally argued that the draft Local Plan does not propose sufficient housing for the area.

Considerable support was indicated for sites at Herne Bay Golf Course and north of the Thanet Way at Whitstable, but there was opposition to sites at South Canterbury, Sturry/Broad Oak, Strode Farm (Herne Bay) and land north of Hersden.

Some of the issues raised relating to the various sites included loss of farmland, traffic congestion, landscape

impacts and impact on local services.

Reasons for supporting some of the proposed sites included provision of new open space and sports and leisure facilities.

A number of alternative development sites and areas were proposed, whether for housing, business or mixed uses, including sites at Canterbury, Herne Bay, Whitstable and some of the larger villages, such as Bridge, Littlebourne, Chartham and Hersden.

Other comments related to:

- Objections to a proposed Park and Ride site at Horsteddown
- Concern about water supply and sewerage issues
- Support for a University Masterplan
- Concern about impact of new housing on local services

- Concern about congestion arising from new development
- The proposed policy to restrict new Houses of Multiple Occupation in some areas
- Issues relating to the National Planning Policy Framework
- Implementation and delivery of sites and infrastructure

The council also received a number of objections to sites that had been proposed, but not included, in the draft plan and also a number of new site proposals. A few proposals for new Local Green Space designations have also been put forward for Chaucer Fields, Kingsmead Field and seafront areas at Whitstable.

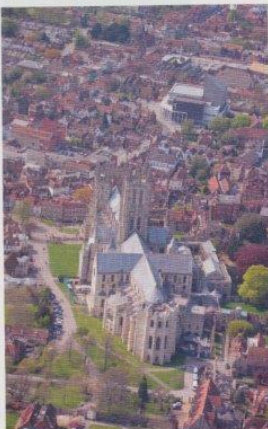
The council is currently considering the comments received in more detail, and will need to identify the main issues that need to be addressed.

It is also in the process of carrying out some final work on the viability of the plan, reviewing the transport modelling and finalising proposals for new green infrastructure. This work, together with the comments on the draft Local Plan, will be reported to city councillors in due course.

It is hoped to publish a formal draft Local Plan in the spring of 2014, and then submit it to the Planning Inspectorate, with an Examination of the draft Plan (carried out by an independent Inspector) later next year.

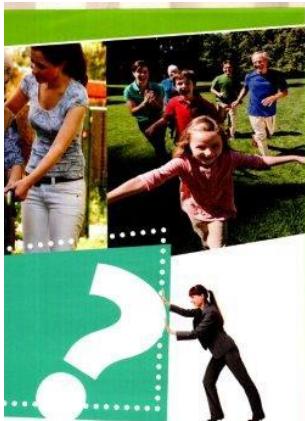
The council's Head of Regeneration and Planning, Ian Brown, said: "We were very pleased with the level of response to the draft plan and the interest shown by local residents and groups. It shows how much people care about the future of the district."

"We are nearing the end of work to analyse all the comments and will be publishing everything on our website as soon as possible. Keep an eye out for announcements in the local papers and on the council's Facebook and Twitter pages."



Our own gateway scene picture in the last edition. Picture by Martin Apple.

Information Leaflets



Our Local Plan puts PEOPLE, PLACES and PROSPERITY at the heart of the vision for our district by

Meeting the needs of local PEOPLE - by providing a mix of homes, shops, community, working people and families to meet the needs of our district and doing our best to help improve the quality of life for our residents.

Creating PLACES - where people want to live - with the right types of homes in the right places, supporting economic, educational, recreational and sporting experiences, whilst protecting our unique built and natural environment.

Securing the PROSPERITY of our district for future generations by supporting the growth of all economic and social activity, offering good job opportunities to local people.

Creating communities

Where new development is planned, the aim is to create new sustainable communities involving a mix of housing, job opportunities, community facilities and open spaces. They will be planned together with those organisations responsible for schools, medical facilities and transport.

Protecting the environment

Protecting our wonderful natural heritage and landscapes and providing access to open space is an important part of the draft plan. It includes supporting the protection and proper management of Canterbury World Heritage Site listed buildings and conservation areas, seeking to protect sites that are important for national and international wildlife sites, such as St Dunstons, the Blean and the coastal areas, and encouraging good design to all new developments, as well as high environmental standards and good internal spaces in new homes. A new protected green space is also proposed to protect the bank to the south of the new community in South Canterbury and Bridge as open space, preventing any further development.



Where will development go?

Taking into account transport and road links, other local facilities and employment opportunities, the draft plan recommends that new housing development should primarily be concentrated in the urban areas of the district with some limited development in the larger villages. But our plan can be flexible to respond to local needs if appropriate development in the smaller villages is identified.

Some principal areas have been identified for development and it is preferable to concentrate development in a smaller number of sites, enabling the creation of whole new communities in a well planned approach rather than a scattered incremental approach across the district. Some of the proposed sites are shown inside.

What is a Local Plan?

The Local Plan sets out a vision for the Canterbury district and how it will develop up to 2031. It is an important document as it will shape the future development of our district covering homes, businesses, shops, leisure facilities, countryside - in fact, everything that contributes to how people live, work, travel and spend their time here.

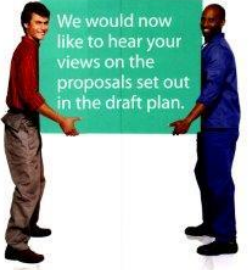
A vision for our district

Most people would agree that the district is a very special place to live, work and enjoy our precious leisure time in. With a beautiful mix of coast and countryside and thriving urban areas, it is understandable why the area is increasingly a magnet for families wanting to settle here.

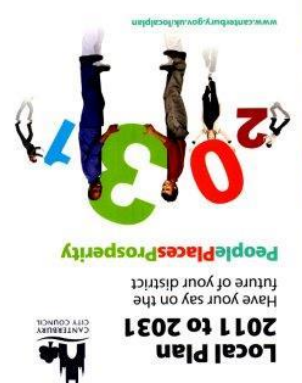
We need to ensure that we can give that same quality of life to our future generations, getting the balance right between our economic ambitions and the need to protect our heritage and open spaces, creating an even better district for all.

Involving our residents

Over the past five years we have regularly consulted with local people on the issues that matter to you and your priorities for the district. Last year, the research charity Ipsos MORI carried out major research with more than 1,000 local people, seeking views on a range of development options for the district. Local community groups have also had the opportunity to hear about and comment on the research. All these views have been important to us in shaping the Local Plan.



We would now like to hear your views on the proposals set out in the draft plan.



Have your say

More than 1,000 local people have already had the chance to help shape the plan. It is now your turn to help shape the plan. It is now your turn to help shape the plan. It is now your turn to help shape the plan.

How to comment

There are three ways you can comment on our draft plan: by attending a public consultation event, by writing to us, or by submitting a written comment to us.

What happens next?	
20 June to 30 August	Public consultation
Autumn 2013	Consideration of comments
December 2013	Final draft plan to council committees
Winter/Spring 2014	Public consultation on final plan submitted for examination
Summer 2014	Local Plan examination
Winter 2014	Inspector's report and adoption



How do we achieve our vision

Why do we need to develop?

Over the past few years, the council has commissioned a number of expert studies and research to identify the best ways to develop and protect our district for the future. All the studies demonstrated that to achieve the vision and our economic ambitions, an increase in development, both residential and business space, along with additional public open space is required. The studies concluded that a supply of 750 new homes a year together with employment land is needed each year up to 2031. This figure would meet employment and affordable housing requirements. The studies also identified land to be protected from development, such as the Area of Outstanding Natural Beauty and open space. The draft plan takes into account the outcomes of these studies and local views, while ensuring that the council meets its national planning requirements.

business, open space, heritage, thriving, facilities, transport

communities, young people, families, affordable homes, jobs, business

How will the Local Plan affect you?

These illustrations are typical of some of the households within our district. The quotes reflect the issues of importance these groups expressed during independent market research last year and what the draft Local Plan will mean to them.

The Greenwood's: Mike (17), Joanne (32), Jessica (7), Josh (5) Amy (1)

Use in a three bedroom terraced house on the outskirts of Whitstable, where I have a family of five. Mike works full time as a very hard and as a full time mum.

Mike: "We love to live in our own home but it is getting more and more expensive to buy a house. I don't also want to rent decent public transport and more cycle routes."

Jake (24) and Kate (23)

Use in a one bedroom terraced flat in Canterbury city. Jake is studying for a degree. Jake is employed in the work and Kate works part time at a nursery while completing a childcare qualification.

Kate: "We've been to stay here after college and whilst job prospects are not great, the area needs to be a good place to live for young people. We need to be able to afford to live here. We have to be able to afford to live here. We need to be able to afford to live here. We need to be able to afford to live here."

The Local Plan will identify housing land to meet local needs and support economic growth and ensure a mix of housing types, and ensure it is available to meet different needs. There is a particular emphasis on affordable housing. The plan will also identify sites for development and sites to be developed alongside the housing.

Key Local Plan proposed sites:

This map shows the seven main development sites being proposed in the draft plan. It also shows the important landscape and wildlife areas that the plan aims to protect in the long term.

- 1 South Canterbury**
 - 4,800 homes.
 - 1,500 open employment spaces.
 - Local shopping.
 - Community centres, primary schools, health centres.
 - Extended Park and Ride.
 - 200 new public open spaces including allotments.
 - 200 new woodland planting.
 - New A2 junction and fast bus link to the city centre.
 - New cycle routes.
 - Combined heat and power facility.
- 2 Land at Sturry/ Broad Oak**
 - 1,000 homes.
 - Business floorspace.
 - Local shopping.
 - Community facilities.
 - Protection and enhancement of ancient woodland.
 - New open spaces, public gardens and playing fields (including allotments).
 - New retail road, including conceptual design.
 - Coverage at Broad Oak and Sturry new car park for Sturry Station.
- 3 Herne Bay Golf Club**
 - 400 homes.
 - The mixed commercial property.
 - Local shopping.
 - The sports and leisure facilities.
 - Site for new secondary school.
 - Dieter's surgery club home.
- 4 Strode Farm**
 - 800 homes.
 - 15,000 open employment floorspace.
 - Local shopping.
 - Community facilities including new park hall.
 - New retail route to Herne.
 - New health, cycle path.
- 5 Hillborough**
 - 1,200 homes.
 - 100 new business spaces.
 - New primary school with other community uses.
 - Additional woodland.
 - Open space north of the railway line.
 - Improvement to junction onto the Thanet Way.
- 6 Land north of Herden**
 - 400 homes.
 - The new business space.
 - New community buildings, job sites and allotments, multi-use games area.
 - Improved footpaths/cycle paths links.
- 7 Thanet Way**
 - 400 homes.
 - Significant extension to Dunbar Drive open space and wildlife area.

District map key

- Red outline: Main development sites
- Blue outline: Main proposal
- Red outline: Areas of Search for possible Eastern Sites
- Green outline: Sites Downside Area of Outstanding Natural Beauty
- Green outline: Areas of High Landscape Value
- Green outline: Protected Natural and International Wildlife Sites
- Green outline: Protected Green Space

Local Plan

The Masons: Debbie (49), David (51), William (20) and Holly (16)

Live in a four bedroom detached house in the outskirts of Canterbury. Debbie is a part time teacher and David is a painter in a local construction firm, and Holly and William are both school students.

David: "We've been looking for a house for a while but it's so expensive. I'd like to see a house that's a bit more affordable. I'd like to see a house that's a bit more affordable. I'd like to see a house that's a bit more affordable. I'd like to see a house that's a bit more affordable."

The Local Plan will provide land in Canterbury to meet the housing need. As there are currently remaining brownfield sites left in the district we have to build on greenfield sites, but brownfield sites for landscape and wildlife will be protected. The development will provide for good public open space between.

The plan will make provision for the growth of the universities and colleges. It will also encourage new and diverse businesses to locate in the area including the development of innovative and high tech businesses, hopefully to raise local salary levels which would enable students like William and Holly to remain in the area.

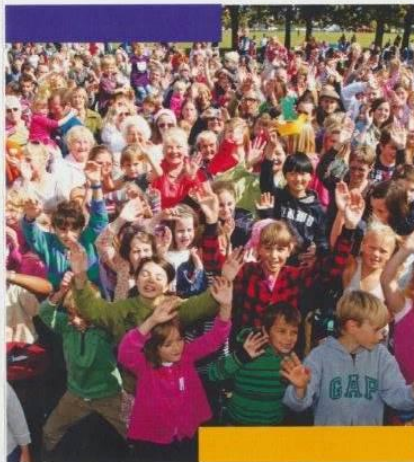
Joyce Smith (81)

Live in a two bedroom terraced flat in central Herne Bay. Joyce: "I think we've got opportunities as an older person but I don't think we've got enough housing for us. It's not enough. We need more housing for us. We need more housing for us. We need more housing for us. We need more housing for us."

The draft Local Plan provides a continued commitment to the regeneration of Herne Bay and improvement of the town centre. New sites will be made available for business in the town and surrounding area to meet housing together with new community facilities will be needed to support the creation of these new jobs. Even today, there is already a clear need for new affordable housing locally with many people, particularly young people, and families unable to afford properties, so the Local Plan will help meet these needs.

Local Plan

What's planned for Herne Bay



Find out more

canterbury.gov.uk/localplan
planning.policy@canterbury.gov.uk
 01227 862 200

Keep up-to-date

Sign up for our newsletter Canterbury.gov.uk
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 Like us on Facebook facebook.com/CanterburyCityCouncil
 Connect with us on LinkedIn linkedin.com/company/canterbury-city-council

canterbury.gov.uk/clocktower

canterbury.gov.uk/localplan



Our vision for Herne Bay is 'to be a vibrant seaside town that the community are proud of and are happy to share with others, offering good quality jobs, housing and transport links and a strong leisure and entertainment sector'.

The regeneration of Herne Bay forms a key part of the Local Plan and Herne Bay Area Action Plan, with both working towards achieving this vision.

The Local Plan

The draft Local Plan, which sets out how the Canterbury district will develop up to 2031 and identifies land for development across the district - including other social, economic and environmental policies, was published last summer for consultation to hear the views of local people on the proposals.

The draft plan included some large sites at Herne Bay, for housing, employment land, retail and sports and community facilities such as schools and medical facilities, together with open space and road improvements. We received around 7,000

comments from about 1,300 individuals and organisations - these are available to view online or can be seen in the council offices in Canterbury, the district office in Herne Bay and the library in Whitstable.

The Area Action Plan (AAP)

In 2010 we adopted the Herne Bay Area Action Plan to realise a variety of projects to strengthen the town centre and improve the local environment, and these are at various stages of implementation.

For Herne Bay, the purpose of the proposals in the draft Local Plan is to reinforce the regeneration objectives in the Area Action Plan. The intention is to do this by providing more housing and employment opportunities for the town, and expanding the range of services and facilities available.



What's happening next?

The main issues arising from the consultation responses are being considered by the council at various committees in April, once this has been done we will publish a final draft for another public consultation.

We will then submit it to the independent Planning Inspectorate for public examination, which is expected to be towards the end of 2014. The inspector will tell us if the draft plan is sound and can be adopted.

Spring 2014

Public consultation on final plan and plan submitted for examination.

Winter 2014

Local Plan examination

Spring 2015

Inspector's report and adoption

How to get involved

You will be able to comment on the final draft Plan early summer, which will be considered by the independent inspector through the examination. You can sign up to our newsletter to receive details of the publication of the draft plan.

Local Plan



We're preparing a Local Plan that sets out how we will plan for the future of our district - for homes, jobs, countryside, shops and leisure facilities.

A vision for our district



PeoplePlacesProsperity

To have your say on your district in 2031 visit www.canterbury.gov.uk/localplan or see the plans in your council offices or libraries.



APPENDIX 3

Table showing the Council's responses to the summary of main issues raised in representations on the Local Plan Preferred Option Consultation Draft consultation

Chapter / policy	Headings / Main issues	Council Response	Any changes required
Foreword	Foreword		
	Full Appropriate Assessment should be carried out.	Discussions with PINS suggest that full Appropriate Assessment would only be required if suitable measures are not agreed with Natural England. Extensive discussions have taken place with NE to ensure that the appropriate set of mitigation measures can be provided alongside future development.	New policy/text needed to demonstrate how Habitat Regulations issues to be addressed.
	Number of policies appears at odds with the objectives of the NPPF of simplifying the current planning system, which may have knock-on impact on the ability to monitor the Plan in the Annual Monitoring Report.	Although there are a large number of policies in the draft Plan, they reflect important issues for delivery of the Plan objectives or for considering future proposals not identified in the Plan. It is the intention to develop a set of core monitoring priorities so as to keep the monitoring process more straightforward.	No change to draft Plan required.
Chapter 1	Strategy		
	Concern that the results of the MORI public opinion research have been misrepresented.	This is not the case. While there are different ways of presenting the complex messages coming back from the consultation, the MORI findings were carefully presented to ensure that there was no misrepresentation.	Review draft Plan text to remove any information that might be interpreted as misleading.
	<p>The Plan should stipulate an annual housing requirement of between 500 and 550 dwellings per year, rather than 780 dwellings per year. This can be supported by the evidence, is closer to historic completion levels in the District (and thus more realistic) and would have less impact on transport and the environment.</p> <p>The Plan should stipulate an annual housing requirement of 1200. This is supported by evidence in the NLP Study.</p>	<p>A lower level of development would not be sufficient to meet all of the identified housing need and demand in the district. Also it would not reflect the current economic vision preferred in the Futures Study consultation. Based on the evidence in the Development Requirements Study, there is a need for a higher level of housing than in the South East Plan, which would only support the creation of 2 net new jobs over the Plan period.</p> <p>Furthermore the National Planning Policy Guidance (August 2013) states that household projections published by DCLG should provide the starting point estimate of overall housing need. However, it is believed that the current interim household projections include an over-estimate of housing need affected by</p>	No change required to draft Plan.

Chapter / policy	Headings / Main issues	Council Response	Any changes required
		student numbers, which were not included in the Development Requirements Study. A higher level of housing is therefore also not accepted.	
	Failure to demonstrate evidence for link between increased housing and economic growth, on which plan is based.	The research provided by NLP indicates the importance of housing in supporting the economy and creating some economic activity directly. It also illustrates the negative impact that a lack of housing has on economic growth. This is not a direct relationship (a direct per dwelling ratio), and is also affected by changing household size, ageing population and in- and out-migration factors. However, there is a strong relationship between housing and economic growth. Legal advice given at the last stage of the draft Plan indicated that a Plan that could be shown to limit growth would be unlikely to be found "sound".	Additional text to provide concise explanation of the relationship between housing and the economy.
	<p>Lack of evidence on duty to co-operate:</p> <ul style="list-style-type: none"> - Lack of reference to discussions with other authorities, including impact of proposed under-provision at Swale and Ashford - Lack of clarity on level of communication with adjacent Councils and how overall numbers relate to adjacent areas - Objections from both Dover (on basis of potential for undermining the DDC Core Strategy) and Swale to Policy SP2. No comments on this policy from Ashford or Shepway. 	<p>The Consultation Statement explains how the City Council has co-operated with relevant bodies and neighbouring Councils in the preparation of the draft Local Plan.</p> <p>In relation to housing numbers, the City Council has already advised Swale Borough Council that it is unable to meet any shortfall identified in the Swale Local Plan process, and the situation regarding Ashford is no different.</p> <p>We have had extensive discussions with neighbouring Councils, and the clear intention is for the different areas of East Kent to contribute different aspects of economic activity to a sub-regional "mosaic" economy. It is not considered that the provisions of the draft Plan will have a negative impact on the wider East Kent economy and that it may in fact have a positive long-term effect on other local economies in East Kent.</p>	Additional text to explain how the Council has met the duty to co-operate.
	Concern that the Local Plan has proceeded in advance of the evidence base, namely the economic strategy (paragraph 1.38), the transport strategy (1.39) the environmental strategy (1.42) and the open space strategy (1.45).	The strategies are all being produced in parallel with the draft Local Plan, and like the draft Local Plan are the result of joint-working and shared evidence between departments.	Minor changes may be required to reflect the development of these strategies, but no other change required.
	Objection to a local definition of sustainable development, and resultant departure from the NPPF	The local definition of sustainable development reflects para 12 of the NPPF, and the findings of the sustainability appraisals, which have informed Plan preparation. The NPPF also states (para 10)	No change required.

Chapter / policy	Headings / Main issues	Council Response	Any changes required
	wording	that Plans need to take local circumstances into account. Para 15 of the NPPF also states that plans should include policies “that will guide how the presumption [in favour of sustainable development] should be applied locally.”	
	Impact of proposed growth on already overstretched services, particularly the highway network	<p>The issue of future service provision is being addressed through consultation and engagement with the relevant bodies (including Kent County Council (education, transport, etc), health providers, National Grid, utility companies and so on. The site agents have been made well aware of the service and infrastructure issues, that affect their various sites, and they have also been speaking with statutory bodies as to how their proposals will address these issues.</p> <p>In transport terms, the provisions of the draft Plan have been the subject of extensive strategic modelling of development options and the preferred option. The Local Plan and the draft Transport Strategy contain a number of measures to address transport issues.</p> <p>Also the larger scale developments provide for large-scale infrastructure improvements to help address existing issues.</p>	No change to draft Plan required.
	Concerns that housing need takes account of student numbers but student accommodation isn't counted against provision	The housing requirements in the Development Requirements Study largely factor out the impact of student numbers. However, because the 2011 Census did collect information about students (away from home), it is believed that the subsequent interim household projections do include an over-estimate affected by student numbers.	No change to draft Plan required.
	Impact on European and protected sites of scale of development proposed	The Council recognises the need to ensure that development in the Draft Plan does not have a significant adverse impact on national and international wildlife sites. The Council has been working with site promoters, Natural England and neighbouring Councils to make sure that both the design of the sites (including on-site open space), and any mitigation measures are sufficient to prevent such adverse impacts.	Policy/text needed to demonstrate how Habitat Regulations issues are to be addressed
SP3	Strategic Site Allocation		
	<p>A number of issues were raised in regard to all sites:</p> <ul style="list-style-type: none"> Exacerbation of existing traffic congestion 	These issues are all being addressed through consultation and engagement with the relevant bodies (including Kent County Council, Natural England, Environment Agency, South East Water,	Policy/text needed to demonstrate how Habitat Regulations issues to be

Chapter / policy	Headings / Main issues	Council Response	Any changes required
	<ul style="list-style-type: none"> • Local infrastructure (surgeries, schools in particular, transport links) already overloaded • Impact on water supply • Insufficient sewerage capacity • Viability / deliverability linked to strategic infrastructure, NPPF compliance issues • Not enough sustainable transport measures provided • High voltage electricity line (existing) at South Canterbury and (future) at Sturry/Broad Oak and Hersden • Concern over recreational pressure on Thanet Coast and Sandwich Bay SPA/Ramsar, Blean Complex SAC and SSSI • Loss of Grade 1 (South Canterbury) and 2/3 (Strode Farm, Hillborough, Greenhill, Golf Club Herne Bay) agricultural land • Resolving student accommodation situation would free up houses so less needed • Due to increase in residential development, significant additional schools will be required 	<p>Southern Water, National Grid, utility companies etc). The site agents are well aware of the environmental, service and infrastructure issues that affect their various sites, and they have also been speaking to the statutory bodies about how their proposals will address these issues.</p> <p>In terms of the transport issues, the City Council and the County Council are producing a joint Transport Strategy, which will set out in detail the long-term sustainable transport measures that would need to be introduced, either alongside development or separately.</p> <p>See response above in relation to impacts of development on national and international wildlife sites.</p> <p>In relation to agricultural land, the Council acknowledges that some of the identified development sites are on best and most versatile farmland. The district as a whole possesses a high proportion of best and most versatile land, which makes development choices difficult. However, it is notable that most of the areas of lower quality land (ie. that which is not best and most versatile) are located in areas which are adjacent to, or part of, national and international wildlife sites, on partly wooded sites, in flood risk areas or in small and remote pockets within the AONB. There is therefore very little scope in the district for building on lower quality farmland.</p> <p>The Council is seeking to address the issue of student accommodation in several ways in the draft Plan – encouraging new student accommodation on campus where possible; supporting new managed accommodation in suitable locations in the City and seeking to restrict new HMOs in areas where there is already a significant level of such accommodation.</p>	<p>addressed; no other detailed changes required to Policy SP3.</p>
SP3a	South Canterbury		
	<p>Two issues dominate responses – the impact of the additional traffic resulting from such a large increase in housing here on an already congested road network and the loss of Grade 1 agricultural land.</p> <p>The scale of the allocation, the impact of such a large</p>	<p>See general response above. Transport issues are being addressed through the transport modelling and the preparation of a Transport Strategy for the district (see above). The Council recognises that these need to be resolved and is working with both the Highways Authority (KCC) and the Highways Agency and developer to ensure that this is the case.</p>	<p>No change to draft Plan required.</p>

Chapter / policy	Headings / Main issues	Council Response	Any changes required
	<p>scale development here on the setting of the city and its location away from high speed rail and major local employers are also concerns particular to this allocation.</p>	<p>The Council also recognises that this is a sizeable urban extension to Canterbury, and that it will place new demands on local services. However, in the previous Plan, the Council sought to focus, almost exclusively, on brownfield sites. While this strategy was largely successful, this means that the only significant development options for Canterbury are now on greenfield land.</p> <p>In relation to agricultural land, the Council acknowledges that the land is best and most versatile farmland. The district as a whole possesses a high proportion of best and most versatile land, which makes development choices difficult. However, it is notable that most of the areas of lower quality land (ie. that which is not best and most versatile) are located in areas which are adjacent to, or part of, national and international wildlife sites, on partly wooded sites, in flood risk areas or in small and remote pockets within the AONB. There is therefore very little scope in the district for building on lower quality farmland.</p> <p>Infrastructure/services issues are addressed above.</p>	
SP3b	Land at Sturry/Broad Oak		
	<p>Increased levels of traffic congestion, the impact of the allocation on the village of Broad Oak, the division of the community following closure of the level crossing and the harm to Ancient Woodland.</p>	<p>See general response above regarding development site and transport.</p> <p>This area was the one identified by the previous Inspector as the most suitable for future development. Although the Council is not bound to follow a previous Inspector's recommendation unquestioningly, as circumstances may have changed since those reports were written. However, the Council does consider that much of the reasoning behind the previous Inquiry Inspector recommendations remains valid, and that the site should be part of the suite of allocated sites.</p> <p>The Council is working to make sure that there is a clear benefit in terms of the Ancient Woodland at the site. Over the last 10 years there has been a significant erosion of the area covered by Ancient Woodland, and some damage done by recreational activity. One of the objectives of this proposal is to ensure that the Ancient Woodland can be brought into positive management; whilst seeking</p>	<p>No change to draft Plan required.</p>

Chapter / policy	Headings / Main issues	Council Response	Any changes required
		<p>to minimise any direct impacts form development.</p> <p>It is not the intention to fully close the Sturry level crossing. It was indicated as a possible solution (if necessary) in the draft Plan. However, the preferred option for both the City Council and the County Council to allow local traffic for access for people in Sturry to services on both sides of the crossing, and for bus services.</p>	
SP3c	Hillborough site, Herne Bay		
	<p>The main issue of concern with this allocation is the impact on Herne and Broomfield and existing services including schools and doctors surgeries, which are already at capacity.</p>	<p>See general response above in relation to future service provision.</p> <p>The main impact on Herne & Broomfield is likely to relate to new traffic generation, but the Council is proposing a new relief road for Herne; assisting with air quality issues and improving the environment of the Conservation Area through the removal of traffic.</p>	<p>No change to draft Plan required.</p>
SP3d	Herne Bay Golf Club		
	<p>This site receives a large degree of support, principally to the increase in sporting facilities that it will provide. Concerns were limited and concentrated in the main on the impact on local services including health and education, water and sewerage, traffic congestion and the erosion of the green gap between Herne Bay and Herne.</p>	<p>See general response above in relation to service provision and infrastructure.</p> <p>There are a lot of benefits associated with this site in terms of open space provision, and meeting the needs of local sports clubs, this has been mentioned in responses to the draft Plan. It also has other benefits when combined with the Strode Farm site.</p> <p>The area between Herne Bay and Herne is not a designated Green Gap, and it is arguable whether this area performs that function. However, there is a substantial amount of open space proposed on this site, which could provide a small open gap in this location.</p>	<p>No change to draft Plan required.</p>
SP3e	Strode Farm, Herne Bay		
	<p>The impact on residential development on this scale on local services, the village of Herne and Conservation Area, the local road network and the exacerbation of existing flooding problems are key areas of concern here.</p>	<p>See general response above in relation to service provision and infrastructure.</p> <p>Any designs for the site will need to reflect the proximity of Herne and the character and nature of the Conservation Area.</p>	<p>No change to draft Plan required.</p>

Chapter / policy	Headings / Main issues	Council Response	Any changes required
SP3f	Land at Greenhill, Herne Bay		
	This site received the fewest comments of the proposed site allocations. Concern focuses mainly on the impact on local schools and other infrastructure.	See general response above. However, it should be noted that KCC, as Highways Authority, have recently raised an objection to the level of housing on this site, following the completion of the latest round of transport modelling. The advice from KCC is that the site could be capable of accommodating 300 units, in highway terms.	That the capacity of this site be reduced to 300 dwellings.
SP3g	Thanet Way Site, Whitstable		
	Along with Herne Bay Golf Club this proposed allocation received more supporting than objecting comments. Objections raised over the number of houses being proposed, the 300 initially suggested in the consultation preferred. Conflicting views on the use of Duncan Down, whilst some welcome the idea many highlight environmental issues as it is registered as a local wildlife site.	See general response above. The site proposals already include a significant proportion of open space, given the size of the site. In terms of design, traffic and other factors, the Council does not consider that there is a case for reducing the number of dwellings to be provided at the site. As far as the relationship with Duncan Down is concerned, care will need to be exercised to ensure that the additional open space provided acts as a buffer area for Duncan Down, providing new complementary habitats, as well as recreational opportunities on a less sensitive site, which should also help to reduce visitor pressure at Duncan Down. Overall, the provision of open space in this location is seen as a benefit to Duncan Down.	No change to draft Plan required.
SP3h	Land North of Hersden		
	The main issue arising from responses to this proposed allocation was the impact on local services and the sense of community here. The impact of development within the wider landscape and the suggestion to re-open the Hersden train station are also raised.	See general response above regarding service provision. It is important that any new development at Hersden is well integrated into the existing settlement and the Development Brief for the site will need to address this issue in detail. The potential of opening the old Colliery halt as a railway station has been explored over many years. This is not realistic, since Network Rail are opposed to such a scheme, because of the impact on High Speed 1 services and journey times to Ramsgate. It is also recognised that there is a Listed Building at the western end of the site and the potential presence of protected species. Any design for the site will need to reflect these issues. The	There may need to be a change in the capacity of the site. This is being assessed at the moment.

Chapter / policy	Headings / Main issues	Council Response	Any changes required
		National Grid proposals may also impact on the capacity of the site.	
Chapter 2	Housing Development		
	Number of responses relating to student housing and its impact on the local housing market.	The Council is seeking to address the issue of student accommodation in several ways in the draft Plan – encouraging new student accommodation on campus where possible; supporting new managed accommodation in suitable locations in the City and seeking to restrict new HMOs in areas where there is already a significant level of such accommodation.	No change to draft Plan required.
	Need to take account of student housing in both housing demand and supply. Conflicting views as to whether this is permissible.	Clarify the situation with CLG relating to the inclusion of student housing in the demand and supply of housing. The housing requirements in the Development Requirements Study largely factor out the impact of student numbers. However, because the 2011 Census did collect information about students (away from home), it is believed that the subsequent interim household projections do include an over-estimate affected by student numbers. However, the scope is fairly limited.	Additional text clarifying whether student housing can or can't be included in the demand or supply of housing.
	Deliverability of the proposed phasing of new development and of affordable housing is queried.	As part of the consultation more information on the phasing of sites has been supplied by landowners and developers. Amend the local plan in light of this new information. In addition further work has been commissioned regarding viability of the local plan as a whole.	Amend the local plan if necessary in light of any new phasing information.
	Link between growth and housing is not substantiated. Economic Land Review does not mention housing as an economic driver.	The research provided by NLP indicates the importance of housing in supporting the economy and creating some economic activity directly. It also illustrates the negative impact that a lack of housing has on economic growth. This is not a direct relationship (a direct per dwelling ratio), and is also affected by changing household size, ageing population and in- and out-migration factors. Clarify the link between the growth and housing in the strategy section of the local plan.	Additional text to provide concise explanation of the relationship between housing and the economy in Chapter 1 strategy.
	Scenario B in the NLP report gets significant support as more realistic having regard to historic completion levels and economic projections.	This lower level of development would not be sufficient to meet all the identified housing need and demand in the district. Also it would not reflect the current economic vision preferred in the Futures Study consultation.	No change to draft Plan required.

Chapter / policy	Headings / Main issues	Council Response	Any changes required
Policy HD1	Strong objections to building on Kingsmead Field, Chaucer Field/Southern Slopes and the overflow car park for Canterbury West Railway Station; withdrawal of housing allocation on Simon Langton Girls' School.	<p>Ideas on the future of Kingsmead Field are currently being addressed at the moment and any subsequent decisions will need to be reflected in the submission draft of the local plan if appropriate. (See also comments relating to Local Green Space on Chapter 11 paragraphs 11.16 11.17). Chaucer Fields/southern slopes are also the subject of comments relating to its designation as Local Green Space (see comments relating to this in Chapter 11 paragraphs 11.16 and 11.17) This land was submitted as part of the SHLAA process and has not been allocated for housing in the local plan. These sites are currently being assessed as to their suitability as Local Green Space.</p> <p>Canterbury West Railway station overflow car park – this is a sustainable location for housing, however, the Council is looking at the need for parking in this area.</p> <p>Kent Country Council indicated that they no longer wish to pursue a housing allocation at Simon Langton Girl's School and have asked for the allocation to be deleted.</p>	<p>See chapter 11 comments relating to local green space paragraphs 11.16 and 11.17.</p> <p>May need to revise boundary of housing allocation at Kingsmead Field to reflect outcome of discussions and the Local Green Space decisions.</p> <p>Remove the housing allocation at Simon Langton Girls' School from the paragraph 2.24, appendix 2 and Inset 1 Canterbury. Reinstate Protection of Existing open space to the schools' playing fields in line with the Council's approach to private playing fields.</p>
	The deliverability (and hence NPPF compliance) of the strategic sites, including timetabling and phasing, is questioned.	As part of the consultation more information on the phasing of sites has been supplied by landowners and developers. Amend the local plan in light of this new information. In addition further work has been commissioned regarding viability of the local plan as a whole.	Amend the local plan if necessary in light of any new phasing/viability information
	Concern that too high a proportion of development is programmed for the strategic sites with few smaller sites identified.	<p>A number of smaller sites are identified in Appendix 2 to the local plan as they already have planning permission or are allocations that have been carried forward from the previous local plan. A number of small sites also come forward as windfalls each year and will continue to do so through the life of the plan.</p> <p>Also, in the previous Plan, the Council sought to focus, almost exclusively, on small and brownfield sites. While this strategy was largely successful, this means that the only significant development options for Canterbury are now on larger greenfield sites.</p>	Clarify text by referring to the other smaller sites that are allocated and listed in appendix 2.
	Queries raised over the reliability of the SHMA as an up	The Council is currently undertaking a partial update of the SHMAA	Amend text if appropriate

Chapter / policy	Headings / Main issues	Council Response	Any changes required
	to date evidence base and as a basis for the identification of the affordable housing requirement and whether it complies with the duty to cooperate.	and the results will feed in to the submission local plan.	once completion of the partial update is complete.
Policy HD6 HMOs	Considerable support for Policy HD6 HMOs and additional support, which is qualified by concerns that the second half of the policy needs to be more tightly worded to prevent it undermining the main thrust of the policy. Need to define "exceptionally high".	A threshold was removed to allow for specific circumstances and to maintain flexibility.	Review wording to ensure clarity
Chapter 3	Economic Development and Employment		
	The link between economic growth and housing is not made clear in the Draft Plan.	See Strategy section.	Additional text to provide concise explanation of the relationship between housing and the economy.
	Draft Plan appears to be advocating increasing the labour supply through major housing development, rather than the expansion of the knowledge economy and as a result the creation of new jobs for residents	The draft Local Plan is seeking to facilitate both elements of the economic equation, providing for the necessary housing to support the economy and the employment land and opportunities to support new and growing businesses. See also Strategy section.	Additional text to provide concise explanation of the relationship between housing and the economy.
	Employment strategy for Herne Bay needed as well as work to attract an economic driver for the town.	Agreed; that is the intention of the combination of policies in the Area Action Plan and the draft Local Plan.	No change to draft Plan required.
	Support for provision of grammar school at coast. Plan needs clearer commitment to provide.	Plan cannot specify school type, but is supportive of increased provision at coast.	No change to draft Plan required.
	Objections to development of best agricultural land.	Noted. However, there is a high preponderance of best and most versatile farm land in the district, and lower quality farmland (ie. that which is not best and most versatile) is primarily located in areas which are adjacent to, or part of, national and international wildlife sites, on partly wooded sites, in flood risk areas or in small and remote pockets within the AONB. There is therefore very little scope in the district for building on lower quality farmland.	No change to draft Plan required.
Policy EMP1	Remove land at Canterbury West from allocated industrial sites due to a more pressing need for more parking and improved crossing here	The land at Canterbury West Station is at a premium and should be used for the most constructive purpose possible. The Council considers that this site is well-suited for office/commercial purposes, especially as it is located on the HS1 route. The Council is keeping under review the need for additional parking at Canterbury West	No change to draft Plan required..

Chapter / policy	Headings / Main issues	Council Response	Any changes required
		and has not ruled out provision of this in the future.	
Policy EMP4	Queries over compliance of EMP4 with paragraph 22 of NPPF.	The NPPF says that "Planning policies should avoid the long term protection of sites allocated for employment use <u>where there is no reasonable prospect of a site being used for that purpose</u> ". The sites identified under Policy EMP4 have been designated following an assessment as part of an Employment Land Review and are all considered capable of being used for those purposes within a reasonable timescale.	No change to draft Plan required.
Policy EMP7	Strong support for EMP7 and the preparation of a masterplan for the university campus. Many but not all of such supporting reps refer also to need to prevent development of Chaucer Fields.	Noted.	No change to draft Plan required.
Policy EMP11	EMP11 would impact on TC and SB SPA and Ramsar Site.	See Strategy section for reference to Habitat Regulations policy.	No change required to Economic Development & Employment Chapter.
Policy EMP13	EMP13 should include ref to AONB.	The Plan should be read as a whole. EMP13 refers to "harm to... physical setting...", and the AONB is obviously a particularly important setting, which is addressed by draft Policy LB1.	No change to draft Plan required.
Policy EMP14	EMP14 contrary to paragraph 25 of the NPPF.	Para 25 refers to the sequential test for main town centre uses. All EMP14 seeks to do is to indicate that preferably new business accommodation should be close to rural communities and services.	No change to draft Plan required.
Chapter 4	Town Centre and Leisure		
	Chapter should define primary shopping areas, and primary and secondary shopping frontages in compliance with paragraph 23 of the NPPF.	The current proposals map does not include the secondary (MIXED) frontages in the Primary Shopping Area. Amend Canterbury Primary Shopping Area to include the major secondary shopping frontages. Insert relevant Primary Shopping Frontages accordingly in area currently marked as Primary Shopping Area.	Amend Primary Shopping Area and inset Primary Shopping Frontages.
Policy TCL5 & QL3	Concern about absence of village shops from Policy TCL5 or similar Policy specific to rural retail facilities.	Policy QL3 relates to village services and facilities. Chapter 4 relates to the town centres.	No change to draft Plan required.
	Query whether the sequential test set out in 4.37 complies with paragraph 24 of the NPPF.	Clarify role of Primary Shopping Area – as beginning of sequential test for retail. Clarify role of town centre, and the sequential test for other 'Main Town Centre Uses'. The reference to retail nodes reflects the accessibility of those areas (in line with para 24), and	Clarify text on sequential text.

Chapter / policy	Headings / Main issues	Council Response	Any changes required
		the concentration of such uses which promotes multi-purpose trips and reducing car travel to more scattered sites in and around the City, reflecting the need to deal with congestion in the City.	
Policy TCL7	Concerns over the impact of Policy TCL7 on the economy of the city centre and the evidence base for this policy.	The DTZ study on a future retail strategy for the City recommended that the Council consider the identification of a single, complementary centre, which would help meet identified retail capacity in a manner to be compatible with the primary role of the City centre. It is envisaged that the retail provision at Wincheap would be for uses and formats not currently represented in the City, rather than those that would be in direct competition with the City centre. A Master-Planning exercise will be undertaken to ensure that the Wincheap redevelopment has a complementary retail function. The NPPF expects the Council to allocate suitable sites, so that needs are met in full.	No change to draft Plan required.
	Concerns at lack of progress on the retail aspect of Herne Bay including the CDA site.	The Council continues to work to regenerate Herne Bay Town Centre in accordance with the AAP.	No change to draft Plan required.
Chapter 5	Transport Infrastructure		
Policy T5	Objection to P & R safeguarding at Harbledown	This site is not an allocation, it still needs to be safeguarded if required for future use. This shows flexibility in the Plan in line with NPPF paragraph 14.	No change to draft Plan required.
Policy T12	Support for new A2 slip road and A28 relief Road at Wincheap. (Many of those supporting this were also objecting to Harbledown Park and Ride)	Noted	
Policy T6	Support for expansion of P & R at Wincheap (incl HA & KCC). (Many of those supporting this were also objecting to Harbledown Park and Ride)	Noted	
Policy T13 & SP3a	Concerns about deliverability and certainty of funding for new road infrastructure including A2 interchange near Bridge	The viability study shows that this can be delivered and funded.	No change to draft Plan required.
Policy T14 & SP3e	Concerns whether the Herne relief road meets paragraph 204 tests in NPPF and the absence of transport evidence base, VISUM modelling results	The Herne relief Road does meet the tests of paragraph 204 of the NPPF as it is necessary to make the development. acceptable in planning terms and is directly related to the development. The VISUM modelling shows additional traffic through Herne and	No change to draft Plan required.

Chapter / policy	Headings / Main issues	Council Response	Any changes required
		the relief road will have the benefits of removing some traffic from Herne; assisting with air quality issues and improving the environment of the Conservation Area through the removal of traffic.	
	Improve Canterbury West station including pedestrian access from the north side and station enhancement	Improvements to the West Station forecourt were completed in December 2013. Access from the north side is an action in the draft Transport Strategy.	No change to draft Plan required.
Policy T15 & SP3b	Objection to Sturry level crossing	There is now no intention to fully close the Sturry crossing.	Amend Policy SP3 to clarify
Chapter 6	Tourism and Visitor Economy		
	This chapter received a high degree of support	Noted	
	Significance of tourism in the local economy welcomed	Noted	
	Concern that the attractiveness of the City of Canterbury to tourists will be jeopardised by large scale development and associated traffic congestion on its edges	The Local Plan and emerging Transport Strategy will ensure that sustainable transport measures are in place to minimise the impact.	No change to draft Plan required.
Policy TV7 & TV8	Chapter lacks attention to rural tourism and facilities	There are 2 policies, Policy TV7 & TV8, and supporting text specifically related to rural tourism and facilities.	No change to draft Plan required.
	Important to ensure increases in visitor numbers are included with an assessment of impact as part of HRA process and that new visitor accommodation contributes to any sustainable access management and monitoring strategies.	An HRA will be carried out as part of any proposal that will increase visitor numbers and measures will be put in place. Monitoring will be addressed through various surveys taking place and future monitoring needs will be developed through Developer contributions.	No change to draft Plan required.
	Overall support for Marina with Herne Bay preferred over Whitstable but concerns over impact on SPA.	Noted. An HRA will be carried out to establish any impact on the SPA. This is referred to in Policy TV5.	No change to draft Plan required.
Chapter 7	Climate Change, Flooding and Coastal Change		

Chapter / policy	Headings / Main issues	Council Response	Any changes required
	South East Water of the opinion that Local Plan as currently drafted does not adequately plan for future water resources.	The development requirements set out in the draft plan were included in the modelling carried out by the Water Resources South East group which include SEW and the EA. Discuss comment with SEW and ensure the plan supports the outcomes of the Water Resources Management Plan and plans positively for water resources.	To discuss further
Policy CC5 & CC6	Queries of compliance of Policies CC5 and CC6 with NPPF	Amend policy CC5 to read: '...no new development will be permitted unless an exceptional justification can be demonstrated through the Sequential and Exception Tests '. Extensions to existing property and change of use must meet the requirements of flood risk assessments. ' This is an EA recommendation. EA did not comment on CC6, but will consult further to ensure this policy is still in-keeping with latest advice, including standing advice.	Amend Policy CC5, CC6 to discuss further.
Policy CC5	Environment Agency want Policy CC5 amended to state that no new developments will occur unless justification through Sequential and Exception Tests	Amend in accordance with EA advice.	Amend Policy CC5
Reservoir Policy CC13	Concerns surrounding the proposed Brand Oak reservoir; that it is not fully integrated into Policy CC13, how it will be supplied given frequent low levels of the Stour, that it will not be delivered in time to meet increased demand arising from strategic site developments and that it will require a full formal environmental impact assessment to be carried out.	Any application for a reservoir at Broad Oak will not be determined by the City Council. The Council, however, is seeking to be fully involved in assessment of impacts on communities and the environment, and justification of need, location and choice of water supply options before any final decision that a reservoir at Broad Oak is an appropriate solution to water supply.	No change to draft Plan required.
Policy CC7	More clarification is required over the 'exceptional justification' in Policy CC7	It would not be appropriate to define exceptional justification. It is normally inappropriate to permit new development in the overtopping hazard zones, since these locations, which can be affected by wave action, are hazardous.	No change to draft Plan required.
	Concerns over development and flood zones including Herne Bay sites, Strode Farm, Plenty Brook, and Kingsmead Field, highlighted by many.	The Council discusses allocations with the EA and the Council's drainage engineers. Development design will have to ensure that runoff from development sites does not increase and that risk is not increased elsewhere.	To discuss alongside development sites.
Chapter 8	Design and the Built environment		

Chapter / policy	Headings / Main issues	Council Response	Any changes required
Policy DBE4	Objection to DBE4 which is considered to be contrary to NPPF paragraphs 59-61	Policy DBE4 sets out positive encouragement for modern design of high quality. It is important in an historic city to set out what constitutes good design and the main considerations for developments in historic settings. Therefore Policy DBE4 is in accordance with NPPF.	No change to draft Plan required.
Policy DBE4	Query necessity of DBE4. This policy overlaps with DBE3, whose phrasing could be strengthened by use of the wording in DBE4.	Policy DBE4 relates specifically to new modern design and is seen as an encouragement for new innovative high quality modern design. It recognises that there may be opportunities a place for modern design. DBE3 relates to all new development including more traditional design and relates more to site context.	No change to draft Plan required.
Policy DBE6	Concern that DBE 6 goes beyond NPPF paragraph 98	The purpose of the planning system is to contribute to the achievement of sustainable development (NPPF paragraph 6). Therefore it is appropriate for this to be set out in a sustainability statement. The statement will need to be proportional to the size of development and impact. Paragraph 98 refers to proposals for renewable energy schemes and therefore does not apply to this policy.	No change to draft Plan required.
Policy DBE7	Concern that DBE7 does not reflect the Lifetimes Homes standards which states that such standards are mandatory from 2011 for all public sector affordable housing and for all housing by 2013.	Further clarification is being sort and the text will be amended in line with the standards if necessary.	Further clarification is being sort and the text will be amended in line with the standards if necessary.
Policy DBE9	Objections that guidance is being accorded policy status (DBE9)	Policy DBE9 clarifies the policy context for the design guide.	No change to draft Plan required.
Chapter 9	Historic Environment		
Policy HE4	Question of compliance of Policy HE4 with the NPPF	This policy is primarily aimed at listed buildings, substantial harm or loss of which should be exceptional. Ensure policy wording is in line with the NPPF. Update chapter wording to take account of anticipated regulations to bring into force changes set out in the Enterprise and Regulatory Reform Act. These are expected in April and include replacing Conservation Area Consent with Planning Permission.	Update chapter text.
Policy HE5	Need for Policy HE5 to include requirement for assessment of impact of development on heritage	Proportional evidence is mention in para 9.29. At Policy HE5 insert the following clause: <i>(d) An assessment of the impact of the</i>	Amend policy HE5

Chapter / policy	Headings / Main issues	Council Response	Any changes required
	asset, and to refer to proportionality of evidence (paragraph 141 of NPPF)	<i>proposed alterations on the historic significance of the building and its setting</i>	
	Need for chapter to include reference to the Canterbury Conservation Area Appraisal and the Kent Historic Environment Record	The Canterbury Conservation Appraisal is mentioned in the chapter. Insert further reference to conservation area appraisals and the Councils ongoing programme of Conservation Area appraisal. The Local Plan currently refers to the Historic Environment Record, a database held by Canterbury City Council. Amend the document to also refer to the Kent Historic Environment Record held by KCC.	Amend chapter to include reference to evidence base documents.
Policy HE1	Recommendation that Council should prepare a district-wide Heritage Strategy to meet NPPF requirements.	Make reference to the Council's intention to prepare a heritage strategy when resources allow. Make clear the current sources of evidence available and insert at HE1 a requirement to submit a Heritage statement with applications that affect listed buildings, locally listed buildings, conservation areas, SAMs, Registered Park and Gardens or archaeological sites. This would draw on evidence to outline the significance of assets and the likely impact of development.	Amend Policy HE1
Chapter 10	Landscape and Biodiversity		
	Queries raised as to whether the Council has reviewed the boundaries of the Canterbury AHLV following the previous Local Plan examination.	The AHLV was reviewed in 2005 by Jacobs. It was a detailed review requested by the Planning Inspector to the 2006 Local Plan. The methodology took account of the Inspector's comments, followed best practice in landscape assessment and only included land which makes a real visual contribution to the valley setting of the historical city within the visual envelope boundary.	No change to draft Plan required.
Policy LB5 & LB6	Kent Wildlife Trust seeks that the issue of the impact of development on the internationally or nationally designated sites to be added to Policy LB3.	Policy LB5 seeks to protect sites of international nature conservation importance. LB6 seeks to protect nationally designated sites. The Plan needs to be read as a whole.	No change to draft Plan required.
	Concern that paragraph 10.35 implies that there has been no assessment of impacts on the Thanet Coast and Sandwich Bay SPA therefore that the plan fails to meet the regulatory requirements of the Conservation of Habitats and Species Regulations 2010.	Paragraph 10.32 – 10.35 need to be reviewed following ongoing discussions with Natural England and timetabled visitor surveys. It is likely that development will have likely significant effects on the Thanet Coast and Sandwich Bay SPA. The Council is currently investigating the 'zone of influence' to determine which housing developments will need to contribute to mitigation.	Review section on internationally designated wildlife sites.
Policy	Conflict between Policies LB8 and LB12 and the	The final form of an allocation and the layout of development within	Continue to review

Chapter / policy	Headings / Main issues	Council Response	Any changes required
LB8 & LB12	strategic site allocation at Sturry / Broad Oak which contains areas of ancient woodland.	it continues to be under review.	development site layout.
	Concern that the Draft Local Plan has been prepared in advance of the results of the Kent Wildlife Habitat Survey and that site allocations have been made without ecological baseline site specific surveys. Given that protected species data is required upfront when considering development proposals, it is advocated by Natural England that the same principle apply to the allocation process.	The Kent Wildlife Survey is completed on a 10 yearly interval, with the most recent survey issued in 2012. The Council will expect all sites to have the necessary ecological survey in place before publishing a submission draft local plan.	No change to draft Plan required.
Policy LB10	Query soundness of Policy LB10 in relation to requirements of paragraph 165 of the NPPF.	This paragraph relates to the plan preparation process and relates to the use of up to date information and sustainability appraisal to consider the impact on the environment, economic and social factors. However, not all future proposals are considered as part of the plan making process and the policy provides means by which to consider future unanticipated proposals. Ensure policy is clear and reflects NPPF.	Review/ clarify policy
Policy LB16 & OS12	Perceived conflict between Policy LB16 and the Council's strategic site allocations and Riverside Strategy as set out in paragraphs 11.79-11.81 and Policy OS12.	Access to the riverside must be done in a manner that conserves and enhances the landscape, water environment and wildlife habitats. Insert reference at OS12 that any lighting must be sensitive and not disturb wildlife. Assessment of the impact of development on river environments and river catchments must be a key consideration as developments progress. The Council will need to closely look at the impact of development on watercourses, including Plenty Brook, Gorrell Stream, River Stour and Sarre Penn, ensuring enhancements where possible.	Insert amendment at Policy OS12
Chapter 11	Open Space		
	There were many sites proposed for designation as a Local Green Space- these included Westmeads recreation ground- Whitstable, West Cliff Meadow-Whitstable, Prospect Field- Whitstable, Cornwallis Circle- Whitstable, Apex of land cnr of Station Road and Railway Avenue- Whitstable, Columbia Avenue recreation ground – Whitstable, Church Street playing field- Whitstable, Tankerton slopes, Marine Parade-	Local Green Space designation assessments are taking place at present to identify suitable sites for designation. Any suitable sites will be designated in the next Local Plan.	Designate suitable sites as Local Green Space, as agreed. New policy if appropriate.

Chapter / policy	Headings / Main issues	Council Response	Any changes required
	Whitstable, Crab and Winkle Way Embankment – Whistable, Chaucer Fields, University of Kent-Canterbury, Kingsmead Field- Canterbury, Green gap between Sturry & Canterbury, Green gap between Sturry and Broad Oak, Green gap between Blean & Rough Common, Green gap between Canterbury & Tyler Hill, Herne Bay Downs from Canterbury Road to Bishopstone, Herne Bay beach from Hampton (Coast guard cottages) to Bishopstone (Reculver Country Park), Whitstable Beach from Sportsman pub, Seasalter to the Coast guard cottages, Swalecliffe		
Policy OS3	Strong support for Policy OS3 for the allocation of land for junior football pitches at Swalecliffe	Noted	
	Policy OS4, allocation at Ridlands Farm for Canterbury City football club, recreation uses and public playing fields, is now out of date	A new Policy will be written to reflect any future decisions by the Council	Amend/new policy as appropriate
	A number of additional Green Gaps were proposed, principally between Herne and Herne Bay and Canterbury and Bridge and also Tyler Hill, Blean and Canterbury, Rough Common and Upper Harbledown, Westbere and the former colliery site and between Hersden and Upstreet.	Assessments are taking place at present. Any suitable sites will be designated in the next Local Plan.	Designate suitable sites as Green Gaps, as agreed
Chapter 12	Quality of Life		
	This chapter received a good level of support.	Noted	
Policy QL8 & QL12	Policy QL8 - concern voiced here and to other policies throughout the Plan over the reduction in services at Kent and Canterbury Hospital and a lack of commitment to seek improvements and no reference to social care	There is a proposal for a new hospital (see housing paper). This will be referred to in the next Local Plan. Policy QL12 supports the provision of new medical and health facilities. Social care provision is also referred to in the Housing chapter, paragraphs 2.80 & 2.81.	No change to draft Plan required.
Policy QL11	Policy QL11- concern voiced both here and against other policies throughout the plan about the impact on air quality as a result of the quantity of new development and roads proposed in the plan	The Council has an Air Quality Action Plan in place, which is being revised to reflect the proposed levels of development in the Local plan. Monitoring is carried out on an annual basis.	No change to draft Plan required.

APPENDIX 4

Record of Consultation and Engagement with Key Stakeholders and Public Bodies Up to 24th April 2014 (meeting of Full Council)

Date – When
Consultees – Who was there/target audience
Role/purpose – What was intended to gain from the consultation/meeting
Outcome – the result in 1 sentence
Location – Where the event/meeting held, notice placed
Format - What was the type of consultation, ie meeting, exhibition, presentation, workshop, Question & answers session, discussion, informal or formal

Date	Consultee/s	Purpose/issues discussed	Outcome	Location	Format
20/5/13	Canterbury for business and Canterbury City Centre Partnership	Business Briefing on the LP	Advice to local stakeholders on Local Plan and up-coming consultation	Canterbury	Discussion
22/5/13	Southern Water	Planning Briefing on WRMP and wastewater	Advice to LPAs on future work programme and relationship to LP programmes	Ashford	Meeting
3/6/13	East Kent District Councils	Discussion regarding proposed CIL for Dover and relationship with neighbouring districts	Continued engagement with Dover CIL work	Dover	Discussion
4/6/13	BDB Planning/Hobbs Parker	Sturry/Broad Oak site	Continued engagement with agents for key proposed development site. Agreement on next steps for progressing proposals	Canterbury	Meeting
6/6/13	Meeting with Corinthian Land	South Canterbury Site	Continued engagement with agents for key proposed development site. Agreement on next steps for progressing proposals	Canterbury	Meeting
13/6/13	Local Stakeholder Groups	Local Plan consultation briefing	Advice to local stakeholders on Local Plan and up-coming consultation	Canterbury	Presentation and Q&A
19/6/13	Whitstable Society	Local Plan consultation briefing	Advice to local stakeholders on Local	Whitstable	Presentation and

Date	Consultee/s	Purpose/issues discussed	Outcome	Location	Format
			Plan and up-coming consultation		Q&A
20/6/13	Public and Stakeholders	The Preferred Option Draft of Canterbury District Local Plan released for consultation	Statutory public consultation on draft Local Plan	District wide	Multiple
21/6/13	Thanet District Council /Dover District Council	Thanet Local Plan Stakeholder conference	Seeking to ensure consistency and alignment of planning strategies	Winter Gardens, Margate	Workshop
25/6/13	Canterbury Society briefing	Discussion on the LP	Advice to local stakeholders on proposed Local Plan and consultation process	Canterbury	Briefing and discussion
26/6/13	Meeting with CPRE	Discussion on the LP	Advice to local stakeholders on proposed Local Plan and consultation process	Canterbury	Meeting discussion
26/6/13	East Kent Local Authorities	East Kent Green Infrastructure Strategy	Agreement on next steps for research programme	Dover	Meeting discussion
28/6/13	Canterbury4Business	Local Plan Conference	Local businesses involved in discussion of Local Plan policy and consultation process	Canterbury	Presentation and Q&A
28/6/13	Kent County Council	Joint Employment Land survey	To ensure common understanding of employment land supply situation	Canterbury district	Site visits
3/7/13	Lee Evans Partnership	Draft Local plan and potential development sites	Agents to provide further information	Canterbury	Meeting
4/7/13	LPMG (umbrella group of organisations dealing with mental health issues)	Local Plan Briefing and consultation discussion	Advice to local stakeholders on proposed Local Plan and consultation process	Canterbury	Discussion and questions
8/7/13	Blean Parish Council	Local Plan Briefing and Neighbourhood Plan discussion	Advice to local stakeholders on proposed Local Plan and consultation process. Blean PC to consider whether NP appropriate	Blean	Presentation and discussion
11/7/13	Canterbury Age-wise	Local Plan Briefing and consultation discussion	Advice to local stakeholders on proposed Local Plan and consultation discussion. Broad support expressed for Plan policies	Canterbury	Presentation and discussion
12/7/13	KPPF	Discussion of local plan programmes and policies and other related planning policy issues	Continued engagement to ensure best practice and consistency of Plan-making	Maidstone	Discussion

Date	Consultee/s	Purpose/issues discussed	Outcome	Location	Format
12/7/13	Thanet and Dover District Councils	Local Plan strategic issues	Explained thinking behind final draft Plan provisions	Maidstone	Discussion
16/7/13	East Kent Local Authorities	Heritage Strategies	Shared position on development of Heritage Strategies	Dover	Meeting
18/7/13	Natural England	Habitat Regulations matters	Agreed a means of resolving any outstanding issues and mitigation matters. CCC to carry out additional research in specific areas	Ashford	Discussion
18/7/13	Development Advisory Panel	Local Plan accessibility and inclusion policies	DAP supported broad range of policies in draft Plan	Canterbury	Discussion
23/7/13	Various Parish Councils	Local Plan Briefing	Advice to local stakeholders on proposed Local Plan and consultation process	Hersden	Presentation and Q&A
24/7/13	Alister Hume	Draft Local Plan and allocated sites	Agents to provide further information	Canterbury	Meeting
06/8/13	Public Meeting	Local Plan Briefing and consultation discussion	Advice to local stakeholders on proposed Local Plan and consultation process	Herne Bay	Presentation and Q&A
15/8/13	BDB Planning/Hobbs Parker	Sturry/Broad Oak allocation	Agents to provide further information	Canterbury	Meeting
20/8/13	Broad Oak Preservation Society	Local Plan allocations	Society to prepare LP comments	Canterbury	Meeting
20/8/13	Herne & Broomfield Parish Council	Local Plan Briefing and consultation discussion	Advice to local stakeholders on proposed Local Plan and consultation process	Herne	Presentation and discussion
6/9/13	KPPF	Discussion of local plan programmes and policies and objectively assessed housing needs	Agreement to continue to liaise closely as housing needs assessments develop	Maidstone	Discussion
09/9/13	CCCU	Future development needs for Canterbury Christ Church University	Agreement to continue to liaise closely as University assessments develop	Canterbury	Discussion
10/9/13	Meeting with Corinthian	South Canterbury site	Continued engagement with agents for key proposed development site. Agreement on next steps for progressing proposals	Canterbury	Meeting discussion
13/9/13	KPOG Meeting	Cooperation on emerging Local Plan	Programme for future work and	Ashford	Discussion

Date	Consultee/s	Purpose/issues discussed	Outcome	Location	Format
		matters; common issues and best practice.	research agreed		
16/9/13	Meeting with CCCU and DEURA	To discuss the future development of Prison and Peugeot sites in relation to meeting needs of CCCU	Agreement to continue to liaise closely as University proposals develop	Canterbury	Discussion
24/9/13	East Kent Local Authorities	East Kent Green Infrastructure proposals	To set a programme to finalise the green infrastructure proposals for East Kent	Dover	Meeting discussion
1/10/13	Canterbury Society	Local Plan proposals and Society's Canterbury Vision	CCC to consider relationship between strategies	Canterbury	Meeting
2/10/13	Kent County Council Transportation	Canterbury Transport modelling	Amey to complete transport modelling following handover from previous contractor	Maidstone	Meeting discussion
8/10/13	Thanet District Council	Habitat Regulations matters	Agree a coordinated approach to HRA matters for agreement with Natural England	TDC offices	Meeting discussion
09/10/13	Meeting with MoD	Member and Officer information site visit to Howe Barracks	Provide background information for consideration of future development of site	Canterbury	Site visit
09/10/13	Meeting with Peter Brett Associates	To discuss future development of Howe Barracks	Agreement to continue to liaise closely as development proposal evolve	Canterbury	Meeting discussion
10/10/13	Corinthian Land	South Canterbury site	Progress on development of site proposals	Canterbury	Meeting
18/10/13	KPOG	Cooperation on emerging Local Plan matters; common issues and best practice.	Programme for future work and research agreed	Margate	Discussion
18/10/13	Kent County Council Education section	Education planning meeting	Ensure that the Local Plan proposals reflect the identified education needs arising from new development	CCC offices	Meeting discussion
5/11/13	Meeting with UKC	Local Plan issues	Seek to ensure that the Local Plan proposals reflect the identified future development needs of the University	Canterbury	Meeting discussion
5/11/13	VLH Associates	Strode Farm site	Progress on development of site proposals	Canterbury	Meeting

Date	Consultee/s	Purpose/issues discussed	Outcome	Location	Format
8/11/13	Thanet District Council and others	Housing Market Capacity meeting	Meeting to inform development of Thanet Local Plan, but to provide liaison with CCC and to ensure compatibility	Margate	Presentation and discussion
11/11/13	East Kent Authorities	Gypsy & Traveller site provision	Liaison in relation to review of East Kent GTAA. Discussion of possible joint DPD	CCC offices	Meeting discussion
12/11/13	Kitewood Estates	Local Plan allocations - Hillborough	Progress on development of site proposals	Canterbury	Meeting
15/11/13	Residents Associations in Canterbury	Article 4 Direction for HMOs in Canterbury	To inform about and discuss progression of Article 4 Direction in context of Local Plan	CCC offices	Meeting discussion
20/11/13	East Kent Regeneration Board	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting
20/11/13	Lee Evans Partnership	Draft Local plan and potential development sites	CCC to consider additional information	Canterbury	Meeting
21/11/13	Natural England	Habitat Regulations matters	Prepare draft approach to Habitat Regulations matters to be agreed with Natural England	NE offices	Meeting discussion
22/11/13	Meeting with Corinthian, Savills, Indigo Planning	South Canterbury site	Progress of supporting studies, including viability work	Canterbury	Meeting discussion
29/11/13	BDB Design, Hobbs Parker	Meeting with developers of Broad Oak / Sturry site	Progress of supporting studies	Canterbury	Meeting discussion
04/12/13	East Kent Chief Executives Forum	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting
04/12/13	CCCU	Future development needs for Canterbury Christ Church University	Agreement to continue to liaise as Local Plan proposals develop	Canterbury	Meeting discussion
06/12/13	KPOG	Cooperation on emerging Local Plan matters; common issues and best practice.	Programme for future policy development work and research agreed	Maidstone	Discussion
6/12/13	East Kent Authorities	Thanet Local Plan - key issues; proposed approach; "fit" with other East Kent plans	Inform/discuss emerging policy for Thanet Plan and seeking to ensure alignment between local plans	TDC offices	Meeting discussion
10/12/13	Advisory Inspector	Advice on draft Local Plan – content and process	Advice from Inspector that draft Plan is generally consistent with issues	CCC offices	Meeting discussion

Date	Consultee/s	Purpose/issues discussed	Outcome	Location	Format
			raised by Inspectors		
11/12/13	East Kent Regeneration Board	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting
11/12/13	BDB Design, Hobbs Parker	Meeting with developers of Broad Oak / Sturry site	Progress of supporting studies	Canterbury	Meeting discussion
12/12/13	John Shephard	Barham Court Farm site	Progression of site proposals	Canterbury	Meeting
08/01/14	East Kent Chief Executives Forum	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting
10/01/14	VLH Associates	Meeting with developer of Strode Farm Herne Bay	Progress of supporting studies	Canterbury	Meeting discussion
15/01/14	East Kent Regeneration Board	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting
20/01/14	George Wilson	Discussion of future business needs and possible development sites	Agreement to continue to liaise as development proposals evolve	Canterbury	Meeting discussion
21/1/14	Meeting with Corinthian Land & Consultants	South Canterbury site	Progress of supporting studies – masterplanning, transport, etc	Canterbury	Meeting discussion
22/1/14	Alister Hume	North Hersden site	Additional work required for site proposals	Canterbury	Meeting
24/1/14	CCC Economic Development	East Kent Investment Plan	Agree proposals (in draft Local Plan) to go forward as part of EKIP bid	CCC offices	Meeting discussion
27/1/14	Natural England; Thanet District Council; Dover District Council; Kent Wildlife Trust; RSPB and others	Thanet Coast and related designations – Habitat Regulations issues and mitigation matters.	Agreement to continue monitoring and research to support development of Local Plan policy and mitigation measures	NE offices	Presentations and discussions
29/1/14	Peter Brett Associates	Howe Barracks site	Agreement on pre-application programme for site proposals	Canterbury	Meeting
31/01/14	BDB Design, Hobbs Parker	Meeting with developer regarding Broad Oak Sturry	Progress of supporting studies	Canterbury	Meeting discussion
03/02/14	George Wilson	Discussion of future business needs and possible development sites	Agreement to continue to liaise as development proposals evolve	Canterbury	Meeting discussion
04/02/14	Canterbury Anglican Deanery	Church planning to meet the needs of new development	Agreement to continue discussions in relation to specific sites as Deanery planning progresses	St May Bredin Church, Canterbury	Presentation and discussions/Q&A
05/02/14	East Kent Chief	Regeneration and strategic planning	East Kent, County and Sub-Regional	Canterbury	Meeting

Date	Consultee/s	Purpose/issues discussed	Outcome	Location	Format
	Executives Forum	issues	regeneration priorities		
10/2/14	Canterbury And Coastal Clinical Commissioning Group	Need for medical facilities to serve new development	CCG generally supportive of the approach set out in draft Local Plan	Herne Bay	Meeting discussion
12/02/14	East Kent Regeneration Board	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting
25/2/14	East Kent authorities	Approaches to CIL and development contributions	Agreement to continue discussions to seek to ensure consistent approaches	Dover DC offices	Meeting discussion
3/03/14	South East Water	Water supply issues to meet the needs of new development	SEW to provide additional information relating to the provision of Broad Oak reservoir	CCC offices	Meeting discussion
3/03/14	Hollamby Estates	Greenhill site	Discussion of proposals for site	Canterbury	Meeting
05/03/14	East Kent Chief Executives Forum	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting
07/3/14	Meeting with CCCU	Future development needs for Canterbury Christ Church University and discussion of sites	Agreement to continue to liaise as Local Plan proposals develop	Canterbury	Meeting discussion
12/03/14	BDB Design, Hobbs Parker	Meeting with developer regarding Broad Oak Sturry	Progress of supporting studies	Canterbury	Meeting discussion
12/03/14	Kent County Council	Liaison meeting on Local Plan and major sites	Agreement to continue discussions on funding and service provision as Plan progresses	CCC offices	Meeting discussion
21/03/14	Kent Planning Policy Forum	Best practice/ shared experience on 5-year housing land supply, developing a coordinated approach to land supply methodology; response to draft London Plan	Agreement to consider joint response to London Plan and to guidance on 5-year housing land supply	Tunbridge Wells	Meeting discussion
26/03/14	Thanet District Council; Dover District Council	Thanet viability study relevant to Canterbury viability and CIL work	Agreement to continue discussions to seek to ensure consistent approaches	Margate	Presentation and discussion
26/03/14	Herne Bay residents and business	Business exhibition covering large range of services, including Council services	Advice to local stakeholders on proposed Local Plan and consultation process	Herne Bay	Public exhibition

Date	Consultee/s	Purpose/issues discussed	Outcome	Location	Format
2/04/14	Corinthian Land Lock & Associates Indigo Planning	South Canterbury site	Progress of supporting studies – masterplanning, transport, etc	Canterbury	Meeting discussion
2/04/14	East Kent Chief Executives Forum	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting
8/04/14	East Kent authorities	CIL progression and common ground on research and policy development	Cooperation meetings to continue through CIL development process	Margate	Meeting discussion
9/04/14	Kent County Council	Development of Canterbury s106/CIL proposals in relation to KCC service provision and local service needs	Agreement to continue discussions to ensure relevant information available to both Councils	Canterbury	Meeting discussion
11/04/14	KPOG	Cooperation on emerging Local Plan matters; common issues and best practice.	Programme for future joint working agreed	Swale	Discussion
15/04/14	Kent local planning authorities	Progress and emerging results from GTAA reviews and intended next steps	Agreement to seek to ensure consistency of methodology and approach	Swale BC offices	Meeting discussion
16/04/14	East Kent Regeneration Board	Regeneration and strategic planning issues	East Kent, County and Sub-Regional regeneration priorities	Canterbury	Meeting

APPENDIX 5

List of Member Working Group Meetings.

Meeting dates for the Local Plan Steering Group since May 2013

Meeting dates
17 March 2014 – 10.30 am
27 February 2014 – 2.30pm
30 January 2014 – 2.30pm
17 December 2013 – 8.30am
24 May 2013 2.00 pm

APPENDIX 6

**Committee Agendas, Reports and Minutes for
Local Plan Publication Draft**

Overview Committee agenda - full documents are available at:

<http://democracy.canterbury.gov.uk/ieListDocuments.aspx?CId=120&MId=9079&Ver=4>

Overview minutes - full documents are available at:

<http://democracy.canterbury.gov.uk/documents/g9079/Printed%20minutes%2002nd-Apr-2014%2019.00%20Overview%20Committee.pdf?T=1>

Executive Agenda Item 215

Subject:	Canterbury District Local Plan – response to “Preferred Options” consultation comments (Regulation 18); publication of pre-Submission Draft Plan (Regulation 19); and submission of draft Plan for Examination (Regulation 22).
Director/Head of Service:	Chief Executive/Assistant Director of Planning & Regeneration
Decision Issues:	These matters are within the authority of the Council
Decision type:	Not applicable.
Classification:	This report is open to the public.
CCC Ward(s):	All
Summary:	<i>This report sets out the issues to be considered in publishing the draft pre-Submission Local Plan; and the process to Submission to the Planning Inspectorate for Examination.</i>
To Recommend to Council:	<p>(A) To publish the Submission draft Local Plan for a period of six weeks to allow representations on matters of “soundness” and legal compliance, with the changes recommended in this report, and subject to no significant issues being raised in the final Sustainability Appraisal report;</p> <p>(B) That the Head of Planning & Regeneration be granted delegated authority, in conjunction with the Portfolio Holder, to make such minor, factual and technical changes to the draft Plan as necessary prior to the publication of the Pre-Submission Draft Plan, that do not affect the overall direction of the draft Plan or the key development decisions; and</p> <p>(C) submit the draft Plan to the Planning Inspectorate for Examination, along with the representations received during the publication period, subject to no substantive new issues arising from the consultation or in the interim, that would necessitate a significant alteration affecting the strategy set out in the draft Plan.</p>
Next stage in process	Once the publication period is complete, the draft Plan must be submitted to the Planning Inspectorate, along with the representations received during the publication period.

SUPPORTING INFORMATION

1. Introduction

The City Council is under a statutory duty to prepare a Local Plan for its area. This has to be the subject of consultation prior to submission for Examination. This report sets out the background to the preparation of the draft Local Plan; and the main issues to be addressed in the draft Plan, following the consultation on the Preferred Option version of the Plan.

It is important that the draft Local Plan reflects the technical evidence gathered over the last few years, and that it is also in conformity with the broad policy basis of the National Planning Policy Framework (NPPF).

As part of a wide-ranging review of Government guidance, the Government has published new national Planning Practice Guidance. The Council will need to take this into account when coming to decisions on the draft Plan.

2. Detail

Government Requirements & Legal Duties

The Council has a number of legal duties in preparing a Local Plan, and there are also requirements placed on the Council by Government guidance (notably in the National Planning Policy Framework)(NPPF).

Briefly, the main issues are:

- (1) The City Council, as local planning authority, is now responsible for determining development requirements for the district. Local Plan decisions (including decisions about development quantities) must be clearly and robustly evidence-based. The NPPF states that local planning authorities should ensure that Local plans meet “the full, objectively assessed needs for market and affordable housing”. The National Planning Policy Guidance indicates that the “household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need”.
- (2) Local Plans need to “be consistent with the principles and policies” (para 151) set out in the NPPF, with a presumption in favour of sustainable development.
- (3) The NPPF stresses at many points the need for local planning authorities to use Local Plans to “plan positively” to meet the economic, social and environmental needs of their areas, and (para 182), that the Plan should be the most appropriate strategy, based on the evidence.
- (4) Local Plan decisions also need to respond to the findings of Sustainability Appraisal (SA) work. The NPPF states (para 165) that “sustainability appraisal... should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors”. It is essential that the Council can demonstrate how it has responded to the findings of the SA process.

The SA should inform the decision making process, and facilitate the evaluation of alternatives. It should also help demonstrate that the plan is the most appropriate given the reasonable alternatives. The Local Plan should normally follow the findings of the SA, unless there are compelling reasons to do otherwise. It is clear that Planning Inspectors place considerable weight on this part of the process, and that draft Local Plans that go against SA findings are often assessed by Inspectors

as being flawed, and requiring significant additional work and delay. The SA needs to meet the requirements of the Strategic Environmental Appraisal Directive. The Habitat Regulations Assessment (HRA) is a particular element of the work which is required in relation to the international wildlife sites in the district.

- (5) Some regard also needs to be paid to previous Inspector's Local Plan Public Inquiry reports. This does not mean that we should follow those recommendations unquestioningly, as circumstances may have changed since those reports were written. However, the Council does need to show that it has considered the reasoning behind previous Inquiry Inspector recommendations in coming to its decisions.

Role of the Inspector

The Inspectorate has a key role to play in the progression of the Local Plan. Ultimately, the Inspector's assessment of the "soundness" of the Plan will determine whether or not the Plan can be adopted by the Council.

The Inspector will consider the evidence gathered by the Council (including the evidence identified in this report), and how the draft Plan responds to that evidence. It is important to recognise that the Examination process is different from both the old Local Plan Inquiry arrangements, and from Section 78 Planning Appeals. The Inspector sets the agenda, not based on the level of objections to any given part of the Plan, but on the basis of what the Inspector considers to be the key issues arising from the evidence base and consultation.

Under the Examination arrangements, the Inspector makes an initial assessment of the Plan document to identify "any fundamental or cumulative flaws" in the Plan. If the Inspector forms an early view that the submitted document may have serious shortcomings that point to potential unsoundness, the Inspector will bring this to the attention of the LPA. This means that an Inspector may hold back an Examination where the draft Plan is considered flawed. This has occurred in different places in Kent in relation to housing numbers.

Furthermore, if the flaw in the draft Plan cannot be resolved sufficiently, an Inspector may simply find the draft Plan to be unsound. The Council would then have to choose to continue with an unsound plan or, which is the clearer and more reasonable option, to withdraw the draft Plan and make significant changes to it.

If either of these situations occurs, it is likely that it will be more difficult for the Council to resist unwelcome housing development proposals and indeed would be in a very weak position at appeal in the event it decided to refuse such proposals.

It is therefore essential that the Local Plan responds appropriately to the evidence gathered, and that the strategy and allocations set out in the Plan follow the evidence.

Planning Inspectorate advice

In December 2013, following the previous consultation, and while the comments were being assessed, a Planning Inspector provided advice on the draft Local Plan and the next stages of the draft Plan. Key issues arising from that advice were as follows:

- (1) The starting point for assessing future housing numbers should be the household projections issued by the Department for Communities & Local Government (CLG). The interim household projections produced by CLG for Canterbury (up to 2021) indicate a need for 840 dwellings per year. Some variation from the interim household projections may be acceptable if there is specific justification that can be supported by evidence. In this case, the Council can provide evidence that the level of housing land is appropriate, given the detailed evidence before it. There would be a real danger of the Plan being rejected at Examination if this is not the case. Not

only that, but this may well also create a situation where the Council cannot demonstrate a 5-year housing land supply, and this would leave the Council vulnerable to “planning by Appeal”;

- (2) The Inspector’s advice was also that the over-provision of housing from the previous Plan period cannot be included in the calculations of housing requirements. This is because the housing targets in the draft Plan should have already taken account of the impact of that provision. This adds 1003 to the housing total for which land needs to be identified in the draft Plan;
- (3) Any examining Inspector will almost certainly question the distribution of housing in the district, and will almost certainly require further information to justify why there is not a greater proportion proposed for the city of Canterbury, in line with the provisions of the South East Plan and the initial Core Strategy Options Report. As stated in the previous report, relating to the Preferred Option consultation, the Council can put forward a strong case for the distribution set out in the draft Plan, based on the imperative for regeneration at Herne Bay, a focus on Sturry (the largest of the villages in the district), and the benefits arising from the provision of new needed infrastructure. However, the council will almost certainly need to provide a more detailed case to the Inspector in due course; and
- (4) The Council will also be required to demonstrate that it has fulfilled the “duty to cooperate” with neighbouring authorities and other “prescribed bodies”, such as Environment Agency. This will need to be included in the Consultation Statement at the next stage. The Inspector advised that this would be one of the first things the examining Inspector will check, and that if the evidence for cooperation is not clear, the Examination could be halted at that point, until the issue was resolved. However, there has been a long and productive history of co-operation in East Kent, and this should be something that the Council can demonstrate clearly.

Responses to main issues raised in representations

The guidance and Regulations require the Council to consider the main issues raised in consultation. These have been considered by Local Plan Steering Group and are attached as a schedule at Annex 1. The recommended responses to those main issues are also included in the schedule, and proposed wording changes are at Annex 2.

Members will be aware that a number of local groups (such as Canterbury Society and CPRE Kent) have submitted substantial representations setting out wider arguments for a different approach to the Local Plan. Whilst the individual points raised have been considered, the wider cases presented have also been considered in their whole.

The key issues arising relate to the following areas:

1. Objections to housing numbers;
2. Objections to overall growth strategy and the link between housing and jobs;
3. Objections to distribution of development;
4. Viability and delivery issues; and
5. Impact on environment issues.

In terms of future housing requirements, the Planning Practice Guidance (2014) on housing and economic development needs assessments indicates that the “household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need”.

The interim household projections for Canterbury are for 840 dwellings per year, some 60 units per year higher than the requirement set out in the draft Local Plan. The NPPG does allow for testing of those figures, and it is believed that the difference between the two figures can be explained by different approaches to the counting of students in the area through the Census.

This indicates that the scale of development identified in the draft Local Plan is of the correct order.

The current housing land position is set out below, based on the officer recommendations for changes to the draft Plan.

The overall strategy set out in the Draft Plan is based on the development of thinking from the first Futures Study in 2007, when local stakeholders identified their favoured strategy to incorporate

- support for developing the existing “experience economy”;
- seek to widen the economic base to develop knowledge-based business in the district, with a focus on the City of Canterbury; and
- to support strong underlying environmental policies.

This was reinforced with the review of the Futures Study in 2011, and this strategy forms the basis of one of the scenarios in the Development Requirements Study, which in turn identified the development requirements set out in the draft Plan.

It is officers’ view that this is the appropriate long-term strategy for Canterbury district and that the draft Local Plan should respond positively to that agenda, as advised in the NPPF.

Thus the draft Local Plan seeks to meet the development requirements identified in the study, to ensure that necessary infrastructure (physical and social) is delivered alongside new development, and to protect the best of the district’s environment, notably the World Heritage Site, the numerous Conservation Areas of Outstanding Natural Beauty (AONB), and the significant areas of national and international wildlife designations in the district.

The relationship between housing and jobs is identified in the National Planning Policy Framework as key, stating that Local Plans should address barriers to economic growth, including housing and that strategies for housing and economic development should be integrated. The relationship is a complex one due to the wide range of variables and factors that influence it. It is also highly dependent upon peoples own lifestyle choices on how they live and work. However, the range of evidence that exists on the link between housing and jobs indicates the following:

- (1) Constrained housing supply can restrict labour market mobility, which can lead to increased commuting, reduced labour market efficiency and costs to business (and the public sector), reducing economic growth and employment opportunities;
- (2) Within any Local Plan there must be broad alignment between jobs, the population of an area (including population profile and the local labour force) and the housing needs associated with that population. The housing strategy for an area should not place risks against achieving the economic strategy for an area. This has been the focus of a number of recent Local Plan examinations;
- (3) The best way of modelling this statistical relationship is to embed it in a demographic model to ensure that the housing and jobs outcome of any given scenario are aligned. Such approaches have been tried and tested at Local Plan examinations. The accuracy of the model will be dependent upon the reasonableness and robustness of the assumptions adopted within them; and
- (4) New housing itself does deliver new jobs. Direct employment in construction, as well as indirect employment in supply chains, can be significant. In addition, a greater population and more households in an area will support the growth in jobs of consumption related sectors (such as retail).

In relation to the distribution of sites, the advice from the Planning Inspectorate is unambiguous. The South East Plan indicated that development in the district should be “predominantly” located at Canterbury. The evidence for that overall approach remains generally sound. The Development Requirements Study, undertaken to provide guidance on future development requirements, also indicates that “economic-led growth in service sectors suggests development predominantly within Canterbury City, where those sectors are more prevalent”. With the changes proposed in this report, the level of housing development at Canterbury is still below 50%.

Officers believe that a good case can be made for the distribution set out in the draft Plan:

- 1) The distribution of sites submitted under the Strategic Housing Land Availability Assessment (SHLAA) process is not predominantly weighted towards Canterbury. This means that there are only a relatively few large sites from which to select, which cannot fully meet the district requirement (this also relates to point 3 below);
- 2) Advice from the Highway Authority, Kent County Council (KCC), and the Council’s own transport planners (following the VISUM transport modelling) is that the transport network in Canterbury cannot sustain a number of new large housing sites at the City, in conjunction with the allocation of Wincheap to meet future identified retail requirements. This is because of congestion on the ring road; the difficulty of achieving fast bus links to the City Centre and limited options in relation to alternative transport routes; and
- 3) There is also still a need to support economic regeneration at Herne Bay (to reinforce the approach set out in the Herne Bay Area Action Plan), with additional housing and employment land, as envisaged in the Core Strategy Options Report.

However, KCC has strongly advised that this should only happen if two key pieces of infrastructure are provided – a new railway crossing and improved road layout at Sturry (to relieve congestion at the junction of the A28 and A291); and a Herne Relief Road (to relieve congestion and prevent the further decline of air quality, and possible designation as an Air Quality Management Area).

This infrastructure is significant and can only be funded by allowing a significant level of development in this area of the district. Apart from the sites at Herne Bay, this includes some development at Sturry/Broad Oak (a location preferred by a previous Local Plan Inquiry Inspector); and to the north of Hersden.

In terms of development viability, an independent study has been undertaken for the Council, looking at the strategic sites and the overall Plan. The conclusions of this study are that the strategic sites are viable, and this is covered below.

It is therefore believed that with sound legal agreements, the developments are capable of delivering the physical and social infrastructure needed to support them.

In relation to environmental matters, the draft Local Plan contains a strong suite of policies which address environmental issues. However, the Council still needs to make provision for its development requirements, and has sought to do so while protecting environmental resources. This does involve conflicts between different environmental issues, and the balance to be struck between all those issues is considered through the Sustainability Appraisal process. The results of Sustainability Appraisal to date for this latest stage are summarized below.

The Council has also received numerous objections from developers whose sites were not allocated in the Preferred Options Local Plan. They present a number of arguments as to why

their sites should be allocated in preference to, or in addition to, the sites in the draft Plan. These points have been considered, but officers are satisfied that the original assessments and studies are correct, and that with a limited number of exceptions set out in this report, the general distribution of development and the specific site selections are appropriate, based on that evidence.

General response to other matters raised in representations

Members will be aware that there are many other comments made in relation to the Plan that are not regarded as main issues. It is considered that most of these points can be addressed within the wider strategy set out in the Plan.

Other changes to the draft Plan can be made where the points raised are valid, and could improve the draft Plan, and a schedule of these changes is attached at Annex 3. Recommended changes to the Proposal Map are attached at Annex 4.

New site proposals

The Council has received a number of new proposals for site allocations, and these are attached in a schedule at Annex 5.

These proposals have been considered by Local Plan Steering Group, and the following sites are recommended to Members for inclusion in the draft Plan:

- (1) Kent & Canterbury Hospital – allocation of site for housing (as part of a wider site including Ridlands Farm and Langton Lane). It is proposed that the Kent & Canterbury Hospital will relocate to the site allocated at South Canterbury, therefore leaving the Hospital available for redevelopment. It is considered that this site, together with adjacent land at Ridlands Farm and Langton Lane could make a significant contribution to meeting the district housing requirements during the Plan period, and should therefore be allocated. The draft Plan should also make clear that the South Canterbury site will incorporate the provision of a relocated Kent & Canterbury Hospital;
- (2) Land to the south of the Joseph Wilson Business Park – allocation for business uses. Although the draft Plan already allocates a sufficient quantity of land for employment purposes, it is considered that this site could add flexibility to the employment land supply, and meet specific business needs;
- (3) Land at Sturry Road, Canterbury – allocation for mixed employment uses. This site was originally submitted under the SHLAA process. As mentioned above the draft Plan allocates a sufficient quantity of land for employment purposes, it is considered that this site could add flexibility to the employment land supply by making land available for business/employment uses outside the standard range of industrial/business uses (known as Class B uses). The allocation of this site would also assist in the delivery of the new Sturry Crossing, providing the route through to the Sturry Road. It is therefore proposed that the site be allocated for the following uses only – Use Classes B1 (business), B8 (storage & distribution), D1 (non-residential institutions) and D2 (assembly and leisure) and certain “sui generis” uses, such as car showrooms, where the anticipated nature and level of traffic generation would not undermine the wider transport objectives in this area. Subject to the same caveat, a mix of these uses or an element of A3/A4 uses might also be acceptable.

Local Green Space proposals

18 sites have been put forward for consideration for designation under the new Local Green Space designation in the NPPF. A schedule of these sites is attached at Annex 6.

The sites have been assessed against the criteria set out in the NPPF (paras 76-78). The NPPF states that designating land as Local Green Space would rule out new development other than in very special circumstances. It advises that “Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services” and if this condition is met, sets out three main criteria to be considered:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

The guidance also makes clear that “the Local Green Space designation will not be appropriate for most green areas or open space”.

These proposals have been considered by the Local Plan Steering Group and the following sites are being recommended for designation as Local Green Space:

- (1) Prospect Field, Joy Lane, Whitstable
- (2) Columbia Avenue Recreation Ground, Whitstable

The remaining sites proposed for Local Green Space are not considered to meet the criteria for designation.

However, following the recent announcement by the Leader of the Council, it is intended (subject to the agreement of Full Council) to designate Kingsmead Field as Protected Open Space under draft Local Plan Policy OS9. This would apply to the area submitted as a proposed Village Green. The remainder of the land to the east of the site would be retained for housing (about 15 dwellings). If Full Council decides not to designate the area as Protected Open Space, the whole site would be retained as a housing site.

Sustainability Appraisal (Amec)

The Council is required to carry out Sustainability Appraisal (SA) at each key stage of the Plan preparation process. This is to ensure that the Plan, as it develops, is objectively assessed on the basis of available evidence, to identify the best balance of social, economic and environmental criteria.

All the previous stages of the Plan have been the subject of SA, as have some of the key documents, including the scenarios developed through the Futures Study, the Development Requirements Study and the sites submitted through the SHLAA process.

The key conclusions from the Preferred Option Local Plan were that there were many significantly positive aspects of the draft plan in relation to the Sustainability objectives, particularly those relating to housing, economy and employment objectives. However, the SA also indicated that the draft Plan should be clearer about how Habitat Regulations issues are addressed, and this point is dealt with below.

In addition, the final draft Plan, including development sites (and draft policies), is the subject of a final SA and Habitat Regulations Assessment. This work is currently being finalised, but the initial assessment by Amec indicates that the changes to the development sites and the broad range of policies in the draft Plan are soundly based, subject to some minor changes, including those relating to the Habitat Regulations Assessment. If the final report of the SA identifies more

substantial concerns, which would lead to significant changes to the draft Plan, this will be reported back to Members at a later date.

The Council will need to consult on that SA/AA and any Appropriate Assessment (if required; see below) as part of the Local Plan consultation.

Habitat Regulations Assessment

A number of comments relating to the draft Local Plan raised the issue of Appropriate Assessment of the draft Plan. Officers have been in discussion with Natural England over a period of months to ensure that Habitat Regulations issues are addressed.

The City Council has, in agreement with Natural England, begun a series of surveys to establish “zones of influence” for the sensitive coastal areas relative to the main areas of settlement. This will assist in developing management measures for the sites.

In broad terms, it is proposed that the Local Plan includes a specific policy relating to Habitat Regulations matters (draft Policy SP8), and that in addition measures are sought as part of new development which would support the funding of new wardening schemes in the district; increased education as to the value of these sites; consideration of management of access to sensitive sites; monitoring of the potential impact of new development (including at the Blean and Stodmarsh; and the provision of significant new open space at proposed strategic development sites, including new habitat areas, which provide alternative informal recreational opportunities. This broad set of measures is supported by Natural England, and on this basis, it is believed that a full Appropriate Assessment is not required to be undertaken for the draft Plan.

These measures are set in the proposed changes to text at Annex 2.

Conclusions of other key studies

VISUM strategic transport modelling

Three broad scenarios were tested through the VISUM model to inform the Preferred Option Local Plan, based on the requirements set out in Scenario E in the Development Requirements Study. The modelling outcomes indicated that a number of principles should be considered:

- Larger scale residential development sites present the opportunity for the inclusion of local facilities and services such as schools, health provision etc. It would be reasonable to assume a higher proportion of walk and cycle trips in this case, reducing the demand on the network. The larger developments at Canterbury may also have the potential to support highway and infrastructure improvements to benefit Canterbury as a whole, as well as providing opportunities for ‘fast-track’ bus services into the city.
- Developments outside the city centre are likely to generate less sustainable trips. The potential for walk and cycle trips is more limited if the destination of the trips is outside the immediate area. Access to a public transport may be more limited than that available within the city.
- Development near to the A2 and A299 will benefit from the access to the available capacity on the major road network. However trips destined for the city will contribute to and suffer from the overloaded network in Canterbury.

The suite of sites identified in the Preferred Option consultation draft of the Local Plan have also been tested through the VISUM transport model.

The model forecasts that in the Do Minimum (background growth in traffic) scenario, travel demand (person trips) would increase by up to 17% and traffic growth (vehicle trips) would

increase by 18%. In the Do Something scenario (represented by the proposals in the draft Local Plan, travel demand would increase by up to an additional 13% and vehicle trips by an additional 10%.

The Transport Strategy contains 4 key strands to reduce these predicted increases and improve journey time reliability. The objective is to accommodate the increase in the demand to travel by increasing the mode shares of walking, cycling, public transport and home working. A headline target of this strategy is that in 2031, traffic levels in the centre of Canterbury will not have increased from the base year.

Plan Viability Assessment

Additional viability work has been undertaken by Adams Integra to assess the viability of the strategic sites identified in the draft Plan, and the overall viability of the draft Plan.

This work concluded that all the strategic sites are viable and that the Plan and its provisions as a whole are viable. The executive summary states that "...the eight strategic sites are viable and can deliver 30% affordable housing alongside the major infrastructure works required to enable the schemes to proceed".

It also states that "the major infrastructure projects required to enable the major strategic sites to be developed can be fully funded by the revenue from the developments themselves without the need for public funding".

Housing land position

As mentioned above, the Council has been advised that the over-provision of housing from the previous Plan period cannot be carried forward into this Plan.

For the purposes of deriving a housing requirement for the Plan period to form the basis for site selection, a number of factors need to be taken into account, and these are set out below.

The "base year" for the Plan is 2011, the formal start year for the new Local Plan.

Housing supply buffer required by NPPF

The NPPF (para 47) requires local planning authorities to maintain a five-year supply with a 5% buffer, to "ensure choice and competition in the market".

It also requires that in areas where there is a record of "persistent under delivery", that buffer should be increased to 20%. However, this provision does not apply to Canterbury district. In the five full years of the South East Plan, completions exceeded the 5-year requirement by 999 units (nearly 40%).

Through most of the Local Plan period, the 5% buffer can be met by land that had been phased for later in the Plan period. Therefore, it is only in the last 5-year period (2026-31), where no future housing supply is identified, that specific provision needs to be made to address the 5% buffer. Under the housing requirements set out in the draft Plan some 3,900 units should be provided in that 5-year period, of which 5% would be 195 units.

Completions during the Plan period

Over the first two years of the Plan period (that is; the last two monitoring years, 2011-13), a net total of 1,128 dwellings were completed. These also need to be netted off the total housing requirement figure.

Existing land supply

The monitoring for the year 2012-13 has been completed, and this work demonstrates that there is an existing land supply (current allocations and permissions) of 1,914 dwellings. This needs to be netted off the total housing requirement figure. The Council's approach to

identifying land supply was described as robust and realistic in a Planning Appeal decision in 2012.

Use of “windfalls”

The NPPF states (para 48) that “local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply”.

Canterbury district has experienced a consistent level of “windfall” planning permissions over a long period. In the 20-year period from 1991 to 2012, 5,397 dwellings were completed as “windfalls”. A proportion of these were large sites, which are unlikely to occur again in such numbers. Officers would therefore recommend that large sites are discounted from any “windfall” projections, and only include an allowance for small site “windfalls”.

In the preparation of the current Local Plan, the Council took the decision to discount a proportion of “windfalls” to reflect the extensive urban housing capacity study work it had undertaken. Despite this, “windfall” permissions have continued to emerge. Since the adoption of the current Local Plan, small site windfalls have averaged 138 units per year.

It would therefore be reasonable to assume an annual “windfall” provision of 138 units (a total of 2,484 units over the Plan period), and this allowance should be “netted off” the total requirement figure.

Table: Residual Housing Requirement

Base date for the Plan is 1st April 2011	
LP requirement of 780pa x 20 years	15,600
completions 2011-12	624
completions 2012-13	524
Residual requirement	14,452
5% buffer 780x5x5%	195
New residual	14,647
Extant planning permissions from 2013 HIA survey	967
Existing local plan allocations	947
HIA Extant supply (PPs + ex allocations)	1,914
Residual requirement	12,733
New strategic allocations 2013	10,110
Other allocations 2013	531
Small site windfall 138x18 years	2,484
New allocations + windfall allowance supply	13,125
Surplus over requirement	392

Changes to housing site allocations

The table below sets out the proposed allocations in the draft Plan.

The main changes are:

- (1) The allocation of the Hospital/Ridland/Langton site is proposed to be added to meet the housing requirement, but also to provide the opportunity for the Kent & Canterbury Hospital to move its services to a modern site at South Canterbury, where there is room for possible future expansion.
- (2) The Howe Barracks site has been added as a more definite proposal since the last Plan, and discussions with the MoD about the re-development of the site have progressed to some extent. The capacity of the site is limited to the mainly built element of the Barracks complex. Much of the rest of the site is a Site of Special Scientific Interest or has other wildlife interest, or is occupied by the Canterbury Golf Club.
- (3) The capacity of the Hillborough site has been increased to 1,300, following additional assessment work being undertaken.
- (4) The potential capacity of the Greenhill site has been reduced to 300, following the completion of the transport modelling, and the projected impact on the road network.
- (5) The potential capacity of the Herne Bay Golf Club site has been increased to 600, following revised proposal from the agents.
- (6) The potential capacity of the site north of Hersden has been reduced to 500, due to the constraints of a Listed Farmhouse at the western end of the site, and to reflect the potential impact of the proposed new power lines associated with the NEMO Connector project.

In relation to the distribution point raised by the advisory Inspector, these changes do slightly increase the proportion of housing at Canterbury.

SHLAA Ref	Site	Housing	Employment
Canterbury		5,425	70,000 sqm
206	South Canterbury	4,000	70,000 sqm
123/190	Hospital/Ridlands/Langton	810	
183/184	Howe Barracks	400	
038	St Martins Hospital	200	
	Kingsmead Field	15	
Herne Bay		3,190	27,000sqm
129	Land at Hillborough	1,300	15,000 sqm
011	Land at Strode Farm	800	12,000 sqm
010	Land at Greenhill	300	
208	Land at Golf Club	600	
013	Bullockstone Road Greenhill	190	
Whitstable		400	-
001	Land north of Thanet Way	400	
Larger Villages		1,626	-
177	Sturry/Broad Oak	1,000	
148	Land north of Hersden	500	
096	Spires Academy, Hersden	81	
211	Barham Court Farm	25	
185	Bakers Lane, Chartham	20	
Totals		10641	97,000 sqm

Use of previously-developed land

Guidance on the priority to use previously-developed land has changed to some degree with the new NPPF. The NPPF states (para 111) that “planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”. However, there is no longer a national target to be followed.

The current Local Plan achieved a very high proportion of housing allocations on previously-developed land. The consequence of that quite tight “brownfield first” approach was that the proportion of housing built on previously-developed land rose from about 63% (4-year average before Local Plan adoption) to 87% (4-year average after Local Plan adoption). The success of that policy, however, does mean that, for a less industrialised area such as Canterbury, the availability of previously-developed land is now highly constrained. Despite this, some 30% of the development sites identified in the draft Plan are located on previously-developed land.

Weight to be given to different issues

The decision on how much development is appropriate, and where it should be located, has to be based on a range of environmental, economic and social factors. Issues such as employment projections, transport infrastructure, housing need and key ecological sites (for example) need to be considered together in coming to a conclusion.

A key piece of evidence informing those decisions should be the Sustainability Appraisal (SA). It is increasingly clear that Planning Inspectors give considerable weight to the conclusion of SA work, and to the way in which local planning authorities respond to the conclusions of that work.

Submission process

The next stage of the Local Plan process is to publish a pre-Submission version of the draft Local Plan for six weeks to allow for comments in relation to matters of “soundness” and legal compliance. It should be noted that this is not the same as the previous consultation, and that comments should relate to issues of “soundness” and legal compliance.

Once the publication period is complete, the Council needs to submit the draft Plan to the Planning Inspectorate for Examination, along with any comments submitted in the publication period. It should be noted that although the Council will collate the comments and identify the main issues, it will be the Inspector who will consider the comments in detail, rather than the Council at this stage.

At that point, the programme is determined by the Planning Inspectorate, the availability of Local Plan Inspectors and the Examination programme.

Weight to be given to draft Local Plan

The guidance indicates that as a draft plan moves through the process, it gradually acquires more weight, dependent on its conformity with the NPPF and the level of objections received to that policy through consultation.

Depending on these factors, it will be possible for Development Management officers to give weight to the draft Plan in dealing with individual planning proposals. This will however, have to be considered on a case-by-case basis.

Recommendations

- (1) To retain the housing and employment land requirements, as set out in the Preferred Option draft Local Plan.
- (2) To amend the site allocations as set out in this report.

(3) To make other changes to the draft Local Plan as set out in the attached schedules.

3. Relevant Council Policy/Strategies/Budgetary Documents

- (1) Canterbury District Local Plan 2006
- (2) Corporate Plan 2011
- (3) Draft Transport Strategy 2014 (on this agenda)
- (4) Housing Strategy 2013

4. Consultation planned or undertaken

This report sets out the overall results of consultation and the next steps in preparing the draft Plan, which will be the Publication of the pre-Submission Plan to allow comments on the soundness of the draft Plan.

It is proposed that a 6 week public consultation period is undertaken for the pre-Submission Publication version of the draft Plan.

5. Options available with reasons for suitability

See main report.

6. Reasons for supporting option recommended, with risk assessment

The main risk associated with the next stages of the Plan process is the risk of the draft Plan being found “unsound” at Examination.

Para 182 of the National Planning Policy Framework states that:

A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Officers have considered the draft Plan as amended against the relevant test of soundness as reflected in para 182 of the NPPF and have concluded that the Council can show not only that

the draft Plan has been prepared in accordance with the Duty to Cooperate, and the legal and procedural requirements but also that it is sound.

The latter conclusion is based principally upon having a robust evidence base which supports the approach taken in the draft Local Plan.

Officers consider that the draft Plan is positively prepared, justified, effective and consistent with the NPPF.

With regard however to the particular issue of housing need, were the approach to be taken which leads to a significant departure from the housing numbers derived from the interim household projections, such an approach would likely to be found “unsound”, and would represent a significant risk to the progression of the draft Local Plan. Not only that, but this may well also create a situation where the Council cannot demonstrate a 5-year housing land supply, and this would leave the Council vulnerable to “planning by Appeal”, losing control of the development process in the district.

There remains a risk (as the advisory Inspector has indicated) that an Examining Inspector will consider that there should be a greater proportion of development at Canterbury itself. Officers believe nevertheless that a strong case can be made for the distribution set out in the draft Local Plan, based on the imperative for regeneration at Herne Bay, a focus on Sturry (the largest of the villages in the district), and the benefits arising from the provision of new needed infrastructure.

Officers are therefore content to recommend that the Draft Plan, as amended by the recommendations in this report, be taken forward to publication.

7. Implications

- (a) Financial Implications – the costs of the Publication of the pre-Submission Plan and any subsequent Examination already have budgetary provision
- (b) Legal Implications – The draft Local Plan has to be prepared in the context of national legislation and planning guidance set out in the National Planning Policy Framework (NPPF). Once the Plan is adopted, it will act as the primary policy guidance for new development in the district. If sites are allocated in the Plan, there will be a presumption in favour of that development, assuming the detailed matters are acceptable.

Other implications

- (c) Staffing/resource – None directly arising from this report
- (d) Property Portfolio – None directly arising from this report
- (e) Environmental/Sustainability – The draft Plan and its allocations and policies have been the subject of a series of Sustainability Appraisals. The draft Plan contains allocations to meet housing and business needs, and a series of policies to protect the best of the local environment.
- (f) Planning/Building Regulations – The adoption of a Local Plan sets the planning strategy for the district for a 15-20 year period, and provides the basis for development decisions. The implications for the Local Plan process are set out in the main body of the report.
- (g) Human Rights issues – None arising directly from this report

- (h) Crime and Disorder – None arising directly from this report
- (i) Biodiversity – The draft Plan contains a number of policies relating to the protection of important sites for habitat and biodiversity; the creation of new habitat areas to support biodiversity; and the development of a Green Infrastructure Strategy to improve open space provision and biodiversity
- (j) Safeguarding Children – None directly arising from this report
- (k) Energy efficiency – None directly arising from this report

8. Conclusions

The conclusions in relation to the points to be considered by Members are set out in the main report.

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For reference purposes the draft Local Plan can be viewed on the Council's website via the following link <https://www.canterbury.gov.uk/planning/planning-policy/local-plan/>

List of Annexes

- (1) Response to Main Issues**
- (2) Proposed Changes relating to Main Issues**
- (3) Other proposed changes**
- (4) Recommended changes to the Proposals Maps**
- (5) New site proposals**
- (6) Local Green Space proposals**

List of background papers (other than published works) for the report

None

Executive minutes - for Publication draft local plan – document located at:
<http://democracy.canterbury.gov.uk/documents/g9070/Printed%20minutes%2010th-Apr-2014%2018.30%20Executive.pdf?T=1>

Executive minute number E215

The Executive Members then RECOMMENDED (to the Full Council)

- (a) That no change be made to the Submission draft of the Local Plan in so far as it relates to the sites at Hersden and Hoplands Farm. (Councillor Bellamy did not vote on this resolution because he had declared a personal interest through his employment with Sturry Parish Council which had made representations about the sites).
- (b) That the following amendments be made to the Submission draft Local Plan

Kingsmead Mixed Use Development – Policy TCL10

Amend the Policy to read

C) Kingsmead: retail, leisure, business and residential

Policy EMP 8 Canterbury Christchurch University

That the site shown on the map included in the Supplement for this item be identified for University purposes

Harbledown Park & Ride

Amend the text of paragraph 5.41 to read:

The Council will keep under regular review the future need for Park and Ride provision, as the sites identified in this Local Plan are brought forward, and will consider alternative sites, if required.

Delete draft Policy T5, and the safeguarding designation on the Proposals Map.

Chaucer Fields/Southern Slopes, University of Kent

Paragraph 11.50 – Green Gaps (Draft Policy OS5 relates)

Add Chaucer Fields / Southern Slopes to the list of proposed Green Gaps in paragraph 11.50 (covered by draft Policy OS5).

Proposals Map

Add a new Green Gap designation at Chaucer Fields / Southern Slopes, as shown on the map included in the Supplement for this item.

- (c) That, subject to the amendments set out above, the Submission draft Local Plan be published for a period of six weeks to allow representations on matters of “soundness” and legal compliance, with the changes recommended in this report, and subject to no significant issues being raised in the final Sustainability Appraisal report.
- (d) That the Assistant Director Planning and Regeneration be granted delegated authority, in conjunction with the portfolio holder, to make such minor, factual and technical changes to the draft Plan as necessary prior to the publication of the Pre-Submission Draft Plan, that do not affect the overall direction of the draft Plan or the key development decisions.
- (e) That the draft Plan be submitted to the Planning Inspectorate for Examination, along with the representations received during the publication period, subject to no substantive new issues arising from the consultation or in the interim, that would necessitate a significant alteration affecting the strategy set out in the draft Plan.

Reasons for the recommendations

The Officers have considered the draft Plan as amended against the relevant test of soundness as reflected in paragraph 182 of the National Planning Policy Framework and have concluded that the Council can show not only that the draft Plan has been prepared in accordance with the Duty to Cooperate, and the legal and procedural requirements but also that it is sound. The latter conclusion is based principally upon having a robust evidence base which supports the approach taken in the draft Local Plan.

Council Meeting Agenda – document located at:

<http://democracy.canterbury.gov.uk/ieListDocuments.aspx?CId=138&MId=9145&Ver=4>

Council Meeting minutes - for Local Plan Publication draft – document located at:

<http://democracy.canterbury.gov.uk/documents/g9145/Printed%20minutes%2024th-Apr-2014%2019.00%20Council.pdf?T=1>

729 EXECUTIVE MINUTES/ REPORTS TO FULL COUNCIL

- (a) **Canterbury District Local Plan - response to "Preferred Options" consultation comments (Regulation 18); publication of Submission Plan (Regulation 19); and submission of draft Plan for Examination (Regulation 22)**

(1) It was proposed by Councillor Gilbey and seconded by Councillor Law that the Council approve the following recommendations at Minute No. E215 of the Executive meeting on 10 April 2014:-

(a) That no change be made to the Submission draft of the Local Plan in so far as it relates to the sites at Hersden and Hoplands Farm.

(b) That the following amendments be made to the Submission draft Local Plan Kingsmead Mixed Use Development – Policy TCL10

Amend the Policy to read

C) Kingsmead: retail, leisure, business and residential

Policy EMP 8 Canterbury Christchurch University

That the site shown on the map included in the Supplement for this item be identified for University purposes Harbledown Park & Ride

Amend the text of paragraph 5.41 to read:

The Council will keep under regular review the future need for Park and Ride provision, as the sites identified in this Local Plan are brought forward, and will consider alternative sites, if required.

Delete draft Policy T5, and the safeguarding designation on the Proposals Map.

Chaucer Fields/Southern Slopes, University of Kent

Paragraph 11.50 – Green Gaps (Draft Policy OS5 relates)

Add Chaucer Fields / Southern Slopes to the list of proposed Green Gaps in paragraph 11.50 (covered by draft Policy OS5).

Proposals Map

Add a new Green Gap designation at Chaucer Fields / Southern Slopes, as shown on the map included in the Supplement for this item

- (c) That, subject to the amendments set out above, the Submission draft Local Plan be published for a period of six weeks to allow representations on matters of “soundness” and legal compliance, with the changes recommended in this report, and subject to no significant issues being raised in the final Sustainability Appraisal report.
- (d) That the Assistant Director Planning and Regeneration be granted delegated authority, in conjunction with the portfolio holder, to make such minor, factual and technical changes to the draft Plan as necessary prior to the publication of the Pre-Submission Draft Plan, that do not affect the overall direction of the draft Plan or the key development decisions.

- (e) That the draft Plan be submitted to the Planning Inspectorate for Examination, along with the representations received during the publication period, subject to no substantive new issues arising from the consultation or in the interim, that would necessitate a significant alteration affecting the strategy set out in the draft Plan.

WHEREUPON –

- (2) It was proposed by Councillor Clark and seconded by Councillor Harrison that the section of West Beach, Whitstable be designated as a local green space.
- (3) Following a debate the amendment at (2) above was then put. A request having been made pursuant to the Council Procedure Rules a record of the voting was taken as follows:-

For the proposal

Councillors Austin, Baker, Baldock, Bellamy, Bull, Byford, Cartwright, Clark, S Cook, Cragg, Dixey, Doyle, Eden-Green, Edwards, Ellis, Fitter, Flanagan, Gilbey, Glover, Harrison, Howes, Law, Lee, Linfield, Morgan, O’Dea, Perkins, Reuby, Samper, Sole, Sonnex, Staley, A Taylor, H Taylor I Thomas, R Thomas, Todd, Vickery-Jones, Waters, Westgate, Williams, Wood and Wratten (43)

Against the proposal

None

Abstained from voting

Councillor A Cook (1)

Absent from the meeting during the consideration and voting on the proposal

*Councillor Hirst (1)

*due to his pecuniary interest

The Lord Mayor declared that the amendment at (2) above was CARRIED.

- (4) Following a debate the proposal at (1) above, as varied by the amendment at (2) above was then put.
A request having been made pursuant to the Council Procedure Rules a record of the voting was taken as follows:-

For the proposal

Councillors Austin, Baker, Bull, Byford, Clark, A Cook, S Cook, Cragg, Doyle, Edwards, Ellis, Fitter, Gilbey, Glover, Harrison, Howes, Law, Lee, Morgan, O’Dea, Reuby, Samper, Sonnex, A Taylor, I Thomas, R Thomas, Todd, Vickery-Jones, Waters and Westgate (30)

Against the proposal

Councillor Eden-Green, Perkins, Sole, Staley, Williams and Wratten (6)

Abstained from voting

Councillors Baldock, Cartwright, Dixey, Flanagan, Linfield, H Taylor and Wood (7)

Absent from the meeting during the consideration and voting on the proposal

*Councillors Bellamy and Hirst (2)

*because of their interest in the item

The Lord Mayor declared that the proposal at (4) above was CARRIED.
Councillors Bellamy and Hirst then re-joined the meeting for the remaining business.