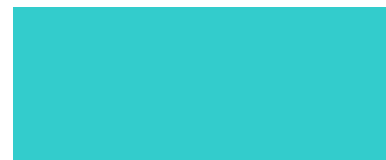
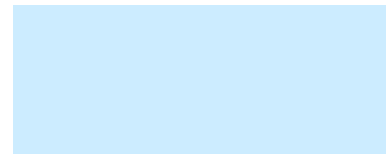


Canterbury District Local Plan

Preferred Option Consultation Draft

Representations Analysis



February 2014

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INTRODUCTION

- 1.1 The **Canterbury District Local Plan Preferred Option Consultation Draft 2013**¹ was published by Canterbury City Council on **20 June 2013**. It sets out, in twelve chapters, 160 planning policies and 8 strategic site allocations to guide the development of Canterbury District over the next 18 years to 2031.
- 1.2 A period of ten weeks was made available for comments. This Report provides a **summary of the Main Issues** arising from this consultation process in compliance with Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 A total of **6,996 comments** were received from **1,331** respondents. This is a significant level of response, and one that is well above the average response rate when compared with other similar consultations across the country. It represents a 93% increase in the number of respondents, and a 115% increase in the number of representations, received to the previous Options stage of the Local Plan.
- 1.4 Of respondents, the majority were local residents (90%). Representations were also made by the specific bodies, as required by The Town and Country Planning (Local Planning) (England) Regulations 2012, and by a wide range of organisations across the groups of other general consultation bodies as set out in Appendix 2 of the adopted Canterbury City Council Statement of Community Involvement (2007). These included developers, landowners and agents, community and residents groups, countryside and conservation groups, local councillors and political parties, and organisations representing disability and ethnic minority groups and interests including the built environment, transport, education, religion and sport. Such a consultee profile represents a broad and thorough representation of the residents and stakeholders of the District.

¹ For ease of reference, this publication will be referred to as the Consultation Draft in this Report.

- 1.5 Comments were received in a variety of formats. Respondents were encouraged to submit comments online at the Council’s consultation portal. However, only 10% of representations were made in this way. Instead, comments were predominantly made by email (58%) and letter (31%).

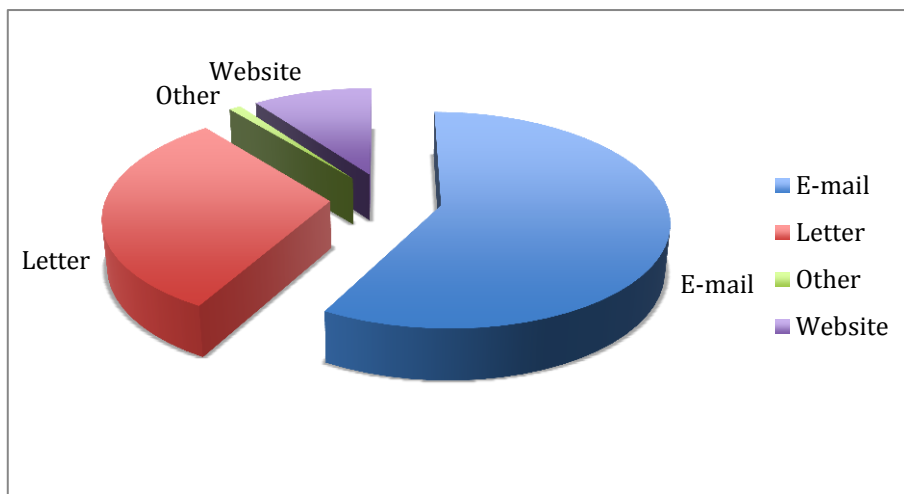


Figure 1: Comments received by format

- 1.6 In the case of those representations not submitted online, the content of each had to be subsequently uploaded onto the online database by Council officers. Given the exceptionally high numbers of comments this process took several months to complete and delayed the release of the representations received, as well as the analysis of the Main Issues that arose from the consultation event.
- 1.7 Respondents were not required to specify the particular paragraph or policy to which their comment related. Given the high proportion of comments which were not made directly online, this again led to administrative delays and it is suggested that this situation is reviewed in subsequent consultation events. In the case of representations made by letter an assessment was initially made by Council officers as to whether the letter was a site-specific objection. In such instances, all the issues raised in the representation, such as transport or ecology were assigned to both the site policy and the relevant topic policies. In the case of non-site specific comments, efforts were made to attach that comment to the most appropriate policy or paragraph. Where a paragraph or policy was specified, either in a web submission, email or letter, this was not altered unless a mistake was clearly made. General concerns about the process or the consultation were set against the Foreword.

General comments on the plan as a whole were set against the Plan Objectives, set out at the start of Chapter 1 of the Consultation Draft. Requests for longer representations to be considered as single entities, despite relating to multiple sections of the Consultation Draft, were resolved by being read and assessed as one representation but recorded online against each of the paragraphs and policies on which comments were made.

- 1.8 As is to be expected in a database of this scale, isolated instances of online errors including supports being logged as objections and vice versa occur, together with a small number of blank entries and duplications.
- 1.9 Representation coverage of the Consultation Draft is comprehensive, with all 160 policies having received comments. Comments focused on Chapters 1 (**Strategy**), and 5 (**Transport**) and 2 (**Housing**). More than one in three (37%) of all representations received were to Chapter 1, while 16% were to Chapter 5 and 12% to Chapter 2.

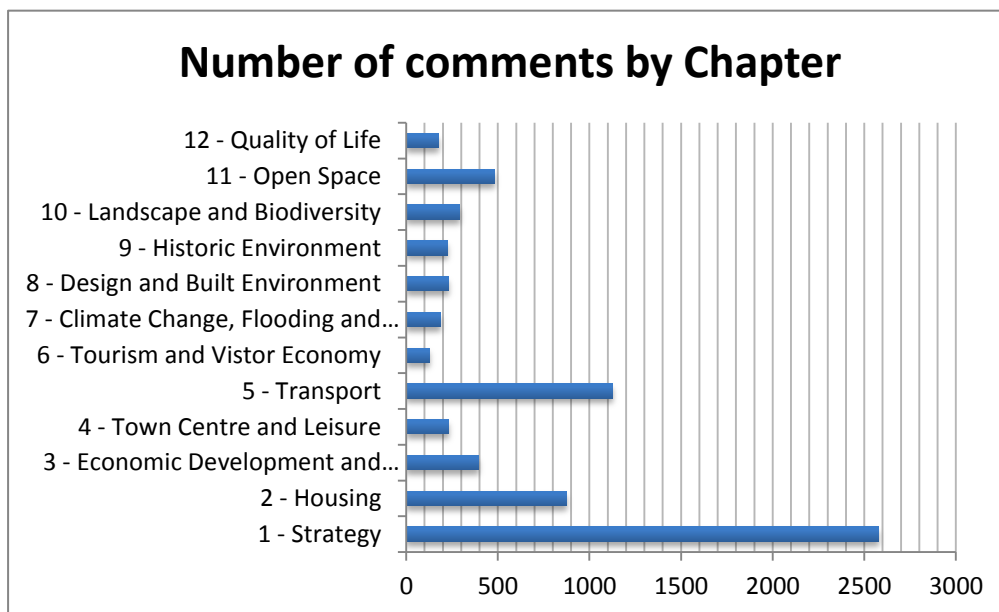


Figure 2: Total number of comments by Chapter

- 1.10 Within these chapters a small number of policies received particular attention. Policies **SP3a** (strategic development allocation at South Canterbury), **SP3d** (strategic development allocation at Herne Bay Golf Club), **SP2** (overall land allocations quantum), **HD1** (strategic housing allocation safeguarding) and **T5** (creation of an additional park and ride facility at

Harbledown) attracted the largest numbers of comments, although straight numerical comparisons are not possible as, as noted in paragraph 1.7 above, site-specific representations were also lodged to generic policies as well as to the strategic site allocations themselves as set out in Chapter 1.

- 1.11 With regard to the categorization of comments, respondents were asked to state whether they supported or objected the part of the Plan on which they were commenting. In the case of representations which stated support for the policy/paragraph, or the principle of the policy/paragraph but which additionally sought minor adjustments to its wording, these have been classified as ‘qualified supports’ and counted separately.
- 1.12 Overall, the Consultation Draft received more support than the previous Options Draft, with one in three representations expressing support for the policies and allocations. There were **significant levels of support** for Strategic Site Allocations **SP3d** at Herne Bay Golf Club (75% of responses) and **SP3g** at Thanet Way Whitstable (61%) and for **Chapter 9** (67%), **Chapter 3** (57%) and **Chapter 10** (55%).
- 1.13 However, as noted above, it is not appropriate to allocate ‘scores’ for individual policies or allocations given the many instances of comments received being applicable to multiple paragraphs or policies, which have resulted in some comments being ‘counted’ many times.
- 1.14 In line with national guidance representations which covered a number of policies or paragraphs were subdivided to ensure that each point raised was individually noted. By way of example, emails and letters received objecting to the safeguarding of an additional Park and Ride site at Faulkner’s Lane, Harbledown frequently presented land adjacent to the existing Park and Ride site at Wincheap as preferable, with associated support for an A2 off-slip road at Wincheap. Such ‘linked’ representations were categorized, and thus ‘counted’ three times; firstly as an objection to T5, and then also as a support for Policy T6 and as a support for Policy T12, in order to ensure that the issues raised in such representations were as accurately recorded as possible. Similarly, many comments on Strategic Site Allocation SP3b (land at Sturry/Broad Oak) raised concerns about the associated closure of the Sturry level crossing. Given that this was a prominent issue it was considered appropriate to log such representations against the relevant transport policy, Policy T15, also even when consultees had not done so.

2. SUMMARY OF MAIN ISSUES

What is a Main Issue?

- 2.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 require Local Planning Authorities to prepare **“a summary of the main issues raised by the representations”**. Although a Main Issue is not defined in legislation or guidance it is generally accepted to mean an issue that goes to the heart of the soundness of the Plan.
- 2.2 Guidance from the Planning Inspectorate² confirms this, defining ‘issues’ in this context as *“the key points on which decisions about the soundness of the document will depend”*³ and ‘main issues’ as *“issues upon which the soundness of the plan depends”*⁴.
- 2.3 Under such a definition it is therefore the nature, and not the volume, of comments received on a particular policy or paragraph that determines whether it or they is or are categorized as a main issue for the purpose of this Report.

Methodology

- 2.4 Given the high response level to the Consultation Draft it is unsurprising that comments received were particularly wide-ranging. All comments received were read and then reviewed on a Chapter by Chapter basis to determine the issues, categorized as Main Issues and Other Matters (other key issues which emerged, together with issues raised by large numbers of respondents), arising from representations on the policies and supporting paragraphs of each Chapter. These are set out in the following Sections of this Report.

² *Examining Local Plans Procedural Practice*, The Planning Inspectorate, December 2013

³ *Examining Local Plans Procedural Practice*, The Planning Inspectorate, December 2013, paragraph 2.5

⁴ *Examining Local Plans Procedural Practice*, The Planning Inspectorate, December 2013, paragraph 5.4

SUMMARY OF MAIN ISSUES ARISING

2.5 The Main Issues to arise from representations across all Chapters can be broadly grouped under the following headings:

- **Deliverability**
- **Jobs Housing balance**
- **Capacity of existing services**
- **Environmental Issues**

Deliverability

2.6 Concern is expressed widely in the representations received, at the dependence of the proposed strategic allocations upon the delivery of significant strategic infrastructure. Given their reliance on the provision of large scale new infrastructure, the deliverability (and hence NPPF compliance) of the strategic sites, including timetabling and phasing, is questioned.

2.7 With regard to new highway infrastructure, including the proposed new A2 interchange near Bridge, concern is raised at lack of clarity as to whether development could come forward in advance and with regard to the strategic development sites in Herne Bay the proposal that these sites are locked together, to share the costs of a relief road, regardless of their individual situation is seen as high risk. Finally, there is concern that the deliverability of affordable housing could be compromised by high infrastructure costs associated with all strategic housing allocations.

2.8 Underlying such objections is frequently concern that the Plan has proceeded in advance of the evidence base, in particular the economic strategy, the transport strategy (including VISUM modelling results), the environmental strategy and the open space strategy. This is viewed by many as undermining the Consultation Draft. In addition, consultees questioned whether it has had adequate regard to a limited number of other significant constraints including the presence of high voltage electricity lines at South Canterbury and route options at Sturry/Broad Oak and Hersden.

Jobs - Housing balance

2.9 Many objections focus on a perceived failure in the Consultation Draft to demonstrate the evidence for the link between increased housing and economic growth on which the overall

strategy is based. The link between growth and housing is not substantiated, or sufficiently so, for many consultees. In particular, representations object to the apparent avocation of an increase in the labour supply through major housing development, rather than an approach rooted in the first instance in the expansion of the knowledge economy.

- 2.10 In terms of overall housing numbers, there was support for reducing this from the proposed 780dpa to around 500 dpa. Scenario B in the Canterbury Development Requirements Study (2012) produced for the Council by Nathaniel Lichfield and Partners receives support as being a more realistic approach having regard to historic completion levels and economic projections.
- 2.11 Finally, given the significant presence of third level education institutions in this District, the issue of student housing and whether such housing can or should count towards overall housing provision is a main issue arising in representations across the policies and strategic site allocations of the Consultation Draft. In particular, concerns are expressed that housing need takes account of student numbers, but that student accommodation isn't currently counted against provision. There is a demand for clarity on this matter and whether student housing can be taken account of in calculating both housing demand and housing supply.

Capacity of existing services

- 2.12 The impact of the levels of proposed development on what are perceived to be already overstretched services, particularly the highway network, although surgeries and schools also get extensive mentions with many local residents stating that they are already unable to get places for children at local schools and access to their local GP surgery, was a main issue to arise from representations across all chapters and sites.
- 2.13 Concern over the exacerbation of existing traffic congestion and not enough sustainable transport measures being advocated was raised by significant numbers of consultees. The potential harmful impact on the water supply and insufficient sewerage capacity of the scale of additional development proposed was raised by service providers.

Environmental issues

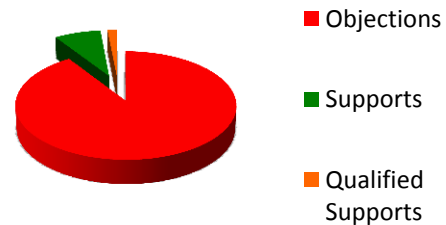
- 2.14 The impact on European and protected sites of the overall scale of development proposed was a main issue to arise in representations, particularly from environmental agencies. In particular, concern was expressed over the potential recreational pressure on the Thanet Coast and Sandwich Bay SPA/Ramsar site, the Blean Complex SAC and the SSSIs of the District including West Blean and Thornden Woods SSSI and Local Wildlife Sites including Duncan Downs from the strategic sites allocations, individually and collectively.
- 2.15 In this regard, concern also arose that the text of the Consultation Draft implies that there had been no assessment of impacts on the Thanet Coast and Sandwich Bay SPA prior to its drafting, and therefore that it fails to meet the regulatory requirements of the Conservation of Habitats and Species Regulations 2010.
- 2.16 The loss of Grade 1 and 2/3 agricultural land including at South Canterbury and the safeguarded Park and Ride site at Harbledown, and at Strode Farm, Hillborough, Greenhill, Golf Club Herne Bay respectively, also received widespread objections. The potential harm to Ancient Woodland as a result of the strategic site allocation at Sturry/Broad Oak also emerged as a main issue. Representations raised concerns over development and flood zones in a small number of cases, including the Herne Bay sites, Strode Farm, Plenty Brook, and Kingsmead Field.

3. SUMMARY OF MAIN ISSUES BY CHAPTER

FOREWORD

65

59 objections
5 supports
1 qualified support



Matters raised concern the process of the Plans' preparation, the consultation process itself and the format and content of the Plan

Plan preparation:

- Views of residents not reflected in document
- Inadequate engagement with the public before the Plan published
- Too much weight given to ancillary reports

Consultation Process:

- Online comment system difficult to operate
- Plan poorly publicised
- Local Plan leaflet only identifies seven of the strategic sites

Format and content of the Plan

- Full Appropriate Assessment should be carried out
- Foreword should reference the NPPF
- Plan would benefit from a detailed contents page and an index of topics and sites and a table of policies in the Adopted Local Plan to be deleted / replaced.
- 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

CHAPTER 1: STRATEGY

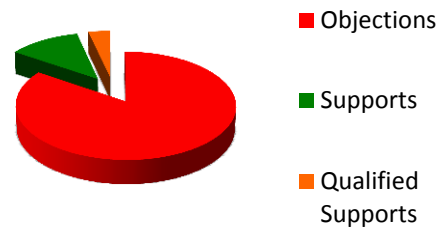
EXCLUDING REPRESENTATIONS ON STRATEGIC SITE ALLOCATIONS
(SP3 A- H) WHICH ARE DEALT WITH SEPARATELY

1,365

1,154 objections

162 supports

49 qualified supports



MAIN ISSUES RAISED

- Concern that the results of the MORI public opinion research have been misrepresented
- Failure to demonstrate evidence for link between increased housing and economic growth, on which plan is based
- Lack of evidence on duty to co-operate
 - 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.
- 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)
- Housing numbers should be reduced from proposed 780dpa to around 500 dpa
- Objection to a local definition of sustainable development, and resultant departure from the NPPF wording
- Impact of proposed growth on already overstretched services, particularly the highway network
- Concerns that housing need takes account of student numbers but student accommodation isn't counted against provision
- Impact on European and protected sites of scale of development proposed

SP3: STRATEGIC SITE ALLOCATIONS

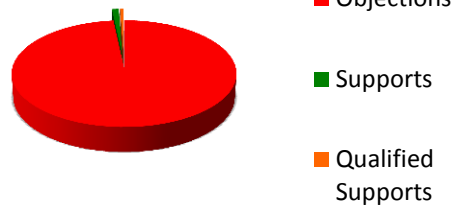
A NUMBER OF ISSUES WERE RAISED IN REGARD TO ALL STRATEGIC SITE ALLOCATIONS :

- Exacerbation of existing traffic congestion
- 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

STRATEGIC SITE ALLOCATION 1: SOUTH CANTERBURY

356

350 objections
4 supports
2 qualified supports



MAIN ISSUES RAISED

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.

- Traffic impact on an already congested road network
 - Is there a transport study?
 - Fast bus won't work on already congested roads
 - Increase in air pollution
- Loss of Grade 1 agricultural land

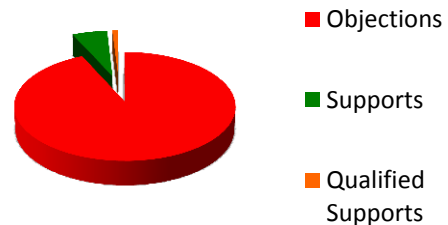
The scale of the allocation, the impact of such a large scale development here on the setting of the city and its location away from high speed rail and major local employers are concerns particular to this allocation.

- Too large a mass of new housing, overwhelming, unsustainable
- Infrastructure of SC (surgeries, schools, transport links) already overloaded
- Will damage the setting and historic fabric of the city – the reason that tourists visit and its main economic generator
- Impact on water supply
- Would lead to merging of Bridge with Canterbury. Need to protect green gap
- Insufficient sewerage capacity
- Wrong side of the city for HS1 and UKC. No major employer this side of Canterbury
- Viability / deliverability uncertain NPPF compliance issues
- Will overwhelm hospital services which have already been downgraded
- Resolving student accommodation situation would free up houses so less needed
- Housing will not generate economic growth
- Harm the Area of High Landscape Value
- Insufficient primary school provision

STRATEGIC SITE ALLOCATION 2: STURRY/BROAD OAK

104

97 objections
6 supports
1 qualified supports



MAIN ISSUES RAISED

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 emerge as the key areas of concern here.

- Will increase traffic problems, including air pollution
- Will double the size of Broad Oak, at odds with how it is defined in the Rural Settlement Hierarchy. As a result it will lose its village identity, will merge with Sturry
- Closure of level crossing will sever link between two parts of community, from services including doctors and shopping and pubs at Fordwich and Broad Oak from the bus route
- Harm Ancient Woodland, irreplaceable habitat contrary to NPPF118 and LB8
- Interacts with new National Grid high voltage electricity connector cable route options, contrary to 162 of NPPF.

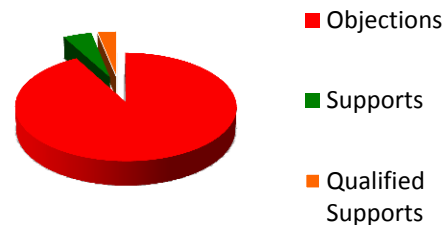
Other Matters raised include

- The loss of countryside / farmland
- Potential for harm to nearby SSSIs and SPA
- Insufficient sewerage capacity and too close to Broad Oak waste water treatment centre contrary to 109 and 120 of NPPF
- Lack of school provision
- Need for improved infrastructure including cycle paths

STRATEGIC SITE ALLOCATION 3: HILLBOROUGH SITE, HERNE BAY

63

58 objections
3 supports
2 qualified supports



MAIN ISSUES RAISED

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.

- impact on and around Herne and Broomfield, loss identity and strain on infrastructure, particularly schools but also doctors, dentists
- All planned sites will impact on the traffic on local roads and the A28 and the Sturry/Broad Oak area
- insufficient sewerage capacity
- No assessment has been done of the impact of the development on the Thanet Coast SSSIs – the site is grade 2/3 Agricultural Land

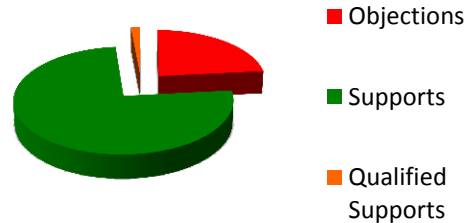
A number of issues arise here and against the Herne Bay sites as a group

- individual and in-combination impact on SPA of additional development on this scale with birds being disturbed throughout the coast.
- The proposed strategic allocations are all dependent upon significant strategic infrastructure. Neither the Local Plan nor its evidence base demonstrates that these sites are viable without such infrastructure.
- The strategic development sites in Herne Bay to share the costs of a relief road. Concern at locking these sites together, to fund such a scheme, regardless of their individual situation seems complex and high risk.
- Due to such increase in residential development, significant additional schools will be required
- Objection to CIL monies raised in Herne Bay going towards Herne Relief Road and Sturry crossing instead of Herne Bay itself

STRATEGIC SITE ALLOCATION 4: HERNE BAY GOLF CLUB

343

79 objections
254 supports
5 qualified supports
Also 5 blanks



MAIN ISSUES RAISED

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.

- Concern over ability of existing infrastructure to cope with this additional development
- insufficient sewerage capacity
- No assessment has been done of the impact of the development on the Thanet Coast SSSIs – the site is grade 3 Agricultural Land

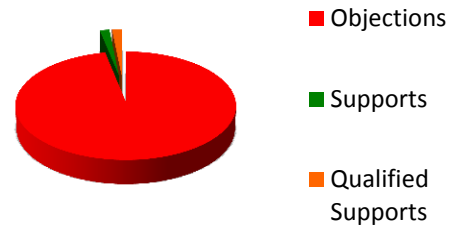
A number of issues arise here and against the Herne Bay sites as a group

- Individual and in-combination impact on SPA of additional development on this scale with birds being disturbed throughout the coast.
- The proposed strategic allocations are all dependent upon significant strategic infrastructure. Neither the Local Plan nor its evidence base demonstrates that these sites are viable without such infrastructure.
- The strategic development sites in Herne Bay to share the costs of a relief road. Concern at locking these sites together, to fund such a scheme, regardless of their individual situation seems complex and high risk.

STRATEGIC SITE ALLOCATION 5: STRODE FARM, HERNE BAY

125

121 objections
2 supports
2 qualified supports



MAIN ISSUES RAISED

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.

- Existing local infrastructure (schools, doctors surgeries in particular but also water and sewerage systems) at capacity
- Will result in village of Herne losing its identity and merging with Herne Bay
- Will exacerbate existing flooding problems
- Will increase traffic problems (particular reference to Bullockstone Road). Plan does not contain any information on traffic data/analysis impact
- Harmful impact on the Conservation Area

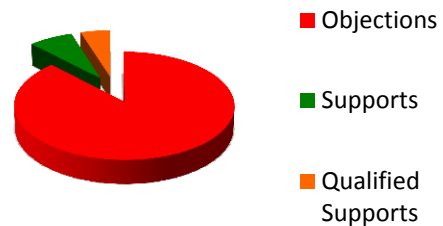
A number of issues arise here and against the Herne Bay sites as a group

- Individual and in-combination impact on SPA of additional development on this scale with birds being disturbed throughout the coast.
- The proposed strategic allocations are all dependent upon significant strategic infrastructure. Neither the Local Plan nor its evidence base demonstrates that these sites are viable without such infrastructure.
- The strategic development sites in Herne Bay to share the costs of a relief road. Concern at locking these sites together, to fund such a scheme, regardless of their individual situation seems complex and high risk.
- Due to such increase in residential development, significant additional schools will be required
- Objection to CIL monies raised in Herne Bay going towards Herne Relief Road and Sturry crossing instead of Herne Bay itself

STRATEGIC SITE ALLOCATION 6: LAND AT GREENHILL, HERNE BAY

41

36 objections
3 supports
2 qualified supports



MAIN ISSUES RAISED

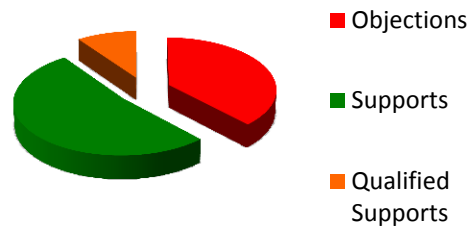
This site received the fewest comments of the proposed site allocations. Concern focuses mainly on the impact on local schools and other infrastructure.

- Objection to impact this on already strained schools and infrastructure . Focus should be on developing Herne Bay rather than expanding .
- Concerns over the loss of identity and merging of Greenhill/ Herne/ Hillborough/ Broomfield
- All planned sites will impact on the traffic on local roads, the A28 and the Sturry/Broad Oak area, which will in turn effect air pollution and wildlife.
- No assessment of the impact of the development on the Thanet Coast SSSIs – the site is grade 2/3 Agricultural Land
- Within the site natural open space to be delivered as part of the development is specified to ensure adequate on-site mitigation is provided. Additionally a need for sufficient natural open space to detract visitors from using the coast for dog walking

STRATEGIC SITE ALLOCATION 7: THANET WAY SITE, WHITSTABLE

71

27 objections
37 supports
7 qualified supports



MAIN ISSUES RAISED

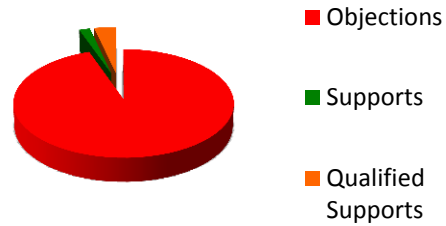
Along with the Herne Bay Golf Club proposed allocation, this proposed allocation received more supporting than objecting comments.

- 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
- Objections to vehicular ingress or egress from Grimshill Estate and foot/cycle routes should be extended into and across the site
- Kent Wildlife Trust reiterate their concern over recreational pressure on Thanet Coast and Sandwich Bay, Blean Complex SAC, West Blean and Thornden Woods SSSI and Duncan Downs LWS
- Southern Water highlights the insufficient sewerage capacity on site for proposed houses.

STRATEGIC SITE ALLOCATION 8: LAND NORTH OF HERSDEN

112

106 objections
2 supports
4 qualified supports



MAIN ISSUES RAISED

The main issue arising from responses to this proposed allocation was the impact on local services and the interaction of the site with high voltage route corridor options.

- Concerns over the loss of sense of community and the impact on infrastructure, childrens play park, listed houses, water and sewage supplies and the impact of increase in numbers on primary schools and the doctors surgery. There are also concerns over traffic implications with many highlighting Bredlands Lane as too narrow to handle the increase in traffic
- National Grid raises concerns over the interaction of land north of Hersden with the proposed route corridor options and sub-options of the new high voltage route corridor.

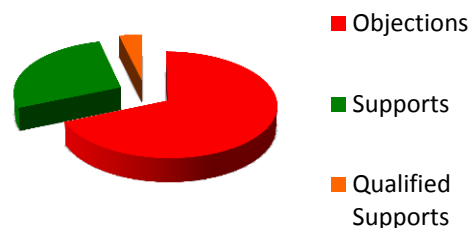
The impact of development within the wider landscape and the suggestion to re-open the Hersden train station are also raised.

- Impact on environment including the impact of the proposed buildings on the skyline and landscape of the area
- Suggestion to reopen Hersden train station and linking this with the High Speed in order to try and reduce traffic congestion
- A number of comments received suggest South Hersden as a more appropriate site location.

CHAPTER 2: HOUSING DEVELOPMENT

874

600 objections
241 supports
33 qualified supports



MAIN ISSUES RAISED

Student housing and its impact on the local housing market in Canterbury figured highly across a number of policies in responses to this chapter. Other main issues included concerns that the link between growth and housing is unexplored and unsubstantiated and the deliverability of the proposed phasing of new development and of affordable housing is queried.

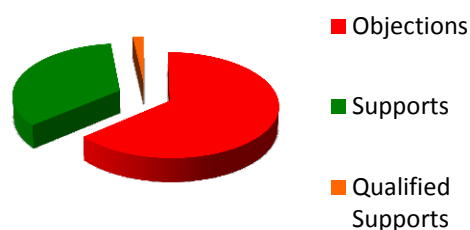
Many of these issues are also raised in representations on Chapter 1 and relate to, and thus should be cross referenced with, the Strategic Site Allocations also set out in Chapter 1

- Need to take account of student housing in both housing demand and supply. Conflicting views as to whether this is permissible.
- Link between growth and housing is not substantiated. Economic Land Review does not mention housing as an economic driver.
- Scenario B in the NLP Report gets significant support as more realistic having regard to historic completion levels and economic projections
- Strong objections to building on Kingsmead Fields, Chaucer Fields/Southern Slopes, the overflow car park for Canterbury West Railway Station and Simon Langton Girls School.
- The deliverability (and hence NPPF compliance) of the strategic sites, including timetabling and phasing, is questioned.
- Concern that too high a proportion of development is programmed for the strategic sites with few smaller sites identified.
- Is the deliverability of affordable housing going to be compromised by high infrastructure costs associated with all strategic housing allocations?
- Queries raised over the reliability of the SHMAA as an up to date evidence base and as a basis for the identification of the affordable housing requirement and whether it complies with the duty to co-operate

CHAPTER 3: ECONOMIC DEVELOPMENT AND EMPLOYMENT

395

252 objections
136 supports
7 qualified supports



MAIN ISSUES RAISED

The main issue raised in representations to Chapter 3 focuses on the link between housing and jobs

- The link between economic growth and housing is not made clear in the Draft Plan
- 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

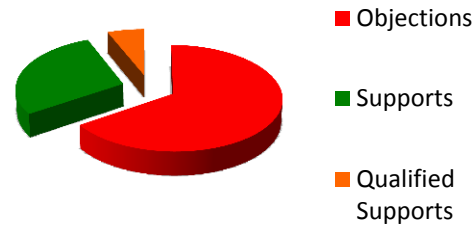
Other matters

- Strong support for EMP7 and the preparation of a masterplan for the university campus (Many but not all of such supporting representations refer also to the need to prevent development of Chaucer Fields)
- Remove land at Canterbury West from allocated employment/office due to more pressing need for more parking and improved access here
- Employment strategy for Herne Bay needed as well as work to attract an economic driver for the town
- Support for provision of grammar school at coast. Plan needs clearer commitment to provide, with land safeguarded.
- EMP11 would impact on Thanet Coast and Sandwich Bay SPA and Ramsar site
- Queries over compliance of EMP4 with paragraph 22 of NPPF
- Queries over compliance of EMP14 with paragraph 25 of the NPPF

CHAPTER 4: TOWN CENTRE AND LEISURE

229

150 objections
65 supports
14 qualified supports



MAIN ISSUES RAISED

- Chapter should define primary shopping areas, and primary and secondary shopping frontages in compliance with paragraph 23 of the NPPF.
- Concern about absence of village shops from Policy TCL5 or similar Policy specific to rural retail facilities.
- Query whether the sequential test set out in 4.37 complies with paragraph 24 of the NPPF.
- Concerns over the impact of Policy TCL7 on the economy of the city centre and the evidence base for this policy.
- Concerns at lack of progress on the retail aspect of Herne Bay including the CDA site.

Other matters raised include

- The Canterbury West Station Area Development Brief should be included in Policy TCL10.
- Support for an expansion of leisure facilities, with particular mention of a multi-screen cinema.
- Reference to 'reasonable rate' in Policy TCL2 lacks clarity.

CHAPTER 5: TRANSPORT INFRASTRUCTURE

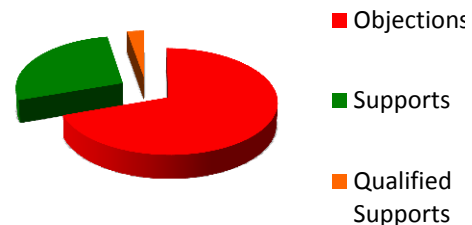
1,131

789 objections

310 supports

31 quantified supports

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MAIN ISSUES RAISED

Dominated by objection to the safeguarding of a site for an additional P&R facility at Harbledown, Chapter 5 responses also demonstrated strong support for a new A2 slip road and A28 relief road at Wincheap and the expansion of the P&R facility at Wincheap. The deliverability of new road infrastructure and the need for improvements to Canterbury West Station are raised by many respondents.

- Objection to P&R safeguarding at Harbledown
 - Loss of productive, grade 1 agricultural land (contrary to NPPF para 112)
 - Will increase traffic on unsuitable minor roads
 - Harm the setting of the Harbledown Conservation Area contrary to HE6 and NPPF
 - Close to/expand Wincheap P&R as viable alternative
 - Harm AHLV
 - Harm historic sites including Bigbury Camp and St Nicholas Hospital, ancient pilgrimage route mentioned in Canterbury Tales
 - No evidence of need in Plan period
 - Harm views from National Trust Golden Hill
 - Unsustainable site contrary to NPPF and LP policies
 - Proximity to infant and junior school
 - No need to safeguard as CCC would not give planning permission for any other development here
 - Alternative brownfield sites available
- Support for new A2 slip road and A28 relief road at Wincheap
- Support for expansion of P&R at Wincheap (both in its own right and as an alternative to Harbledown)

MAIN ISSUES RAISED continued

- Concerns about deliverability and certainty of funding for new road infrastructure including new A2 interchange near Bridge, whether the Herne relief road meets paragraph 204 tests in NPPF and the absence of transport evidence base, VISUM modelling results
- Improve Canterbury West including safeguarding land on Roper Rd for additional pedestrian access and station enhancement
- Need to rebalance transport demands and provide / facilitate more sustainable modes of transport
- Objection to closure of Sturry level crossing
 - Divide the village
 - Will worsen and relocate congestion

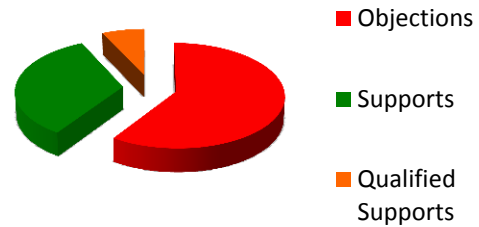
Other matters raised include:

- Increase and co-ordinate cycling routes and extend to outlying villages
Plan should include commitment to preserve and enhance PROW
- T8 should have same criteria as T9 as will impact on the setting of the AONB
- contrary to NPPF to defer to SPD as in T10
- Overall support for eastern by-pass
- Reference should be included in T17 or supporting paragraphs to the Rural Streets and Lanes: a design handbook produced by the Kent Downs AONB Unit and adopted by KCC

CHAPTER 6: TOURISM AND VISITOR ECONOMY

128

76 objections
43 supports
9 qualified supports



This chapter received a high degree of support.

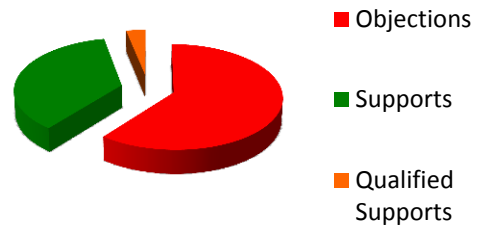
Concerns focus on impact of the proposed large scale development on the fringes of city on its tourism appeal, the lack of attention to both rural tourism and the impact of visitor numbers on the coastal SPA/Ramsar sites and the Kent Downs AONB. There is overall support for a marina.

- Significance of tourism in the local economy welcomed. Many suggestions received as to how to broaden appeal.
- Concern that the attractiveness of City of Canterbury to tourists will be jeopardised by large scale development and associated traffic congestion on its edges.
- Chapter lacks attention to rural tourism and facilities
- Important to ensure increases in visitor numbers are included with assessment of impact as part of HRA process and that new visitor accommodation contributes to any Sustainable Access Management and Monitoring Strategies.
- Overall support for marina with Herne Bay preferred over Whitstable but concerns over impact on SPA

CHAPTER 7: CLIMATE CHANGE, FLOODING & COASTAL CHANGE

189

115 objections
68 supports
6 qualified supports



MAIN ISSUES RAISED

- South East Water of the opinion that Local Plan as currently drafted does not adequately plan for future water resources.
- Queries of compliance of Policies CC5 and CC6 with NPPF
- Environment Agency want Policy CC5 amended to state that no new developments will occur unless justification through Sequential and Exception Tests
- Concerns surrounding the proposed Broad 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.
- More clarification is required over the 'exceptional justification' in Policy CC7
- Concerns over development and flood zones including Herne Bay sites, Strode Farm, Plenty Brook, and Kingsmead Field highlighted by many

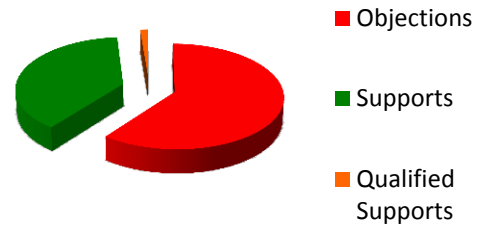
Other matters raised include:

- Should promote rain water harvesting as a solution to water issues.
- RSPB would like to be included as a stakeholder to investigate and consider the definition of coastal change management area at Reculver
- Kent Wildlife Trust raise concerns that possible culverting and pumping of Gorrell Stream, Swalecliffe Brook, Westbrook and Plenty Brook would conflict with enhancement of aquatic habitats
- Reference to large scale solar farms should be added given their increasing occurrences

CHAPTER 8: DESIGN AND THE BUILT ENVIRONMENT

230

139 objections
88 supports
3 qualified supports



MAIN ISSUES RAISED

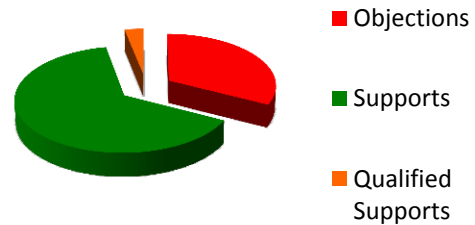
There was a good level of support for this Chapter, with comments broadly falling into those who felt the policies were too onerous and those who felt they didn't go far enough.

- Objection to DBE4 which is considered to be contrary to NPPF paragraphs 59 – 61.
- Query necessity of Policy DBE4. This Policy overlaps with DBE3, whose phrasing could be strengthened by use of the wording in DBE4.
- Concern that DBE6 goes beyond NPPF paragraph 98
- Concern that DBE7 doesn't reflect Lifetime Homes Standards which states that such standards are mandatory from 2011 for all public sector/affordable housing and for all housing by 2013.
- Objections that guidance is being accorded policy status (DBE9)

CHAPTER 9: HISTORIC ENVIRONMENT

224

73 objections
144 supports
7 qualified supports



This chapter received considerable support. Concerns were raised only in small numbers or single mentions.

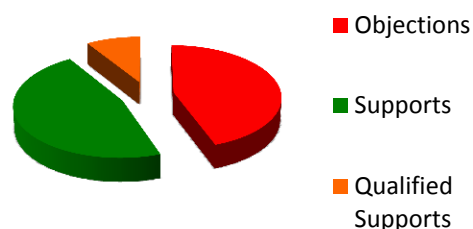
Concerns include:

- Question of compliance of Policy HE4 with the NPPF
- Need for Policy HE5 to include requirement for assessment of impact of development on heritage asset, and to refer to proportionality of evidence (paragraph 141 of NPPF)
- Need for chapter to include reference to the Canterbury Conservation Area Appraisal and the Kent Historic Environment Record
- Recommendation that Council should prepare a district-wide Heritage Strategy to meet NPPF requirements.
- Objection to the extent of the proposed World Heritage Buffer Zone under UNESCO Operational Guidelines, paragraph 104

CHAPTER 10: LANDSCAPE AND BIODIVERSITY

290

129 objections
135 supports
26 qualified supports



MAIN ISSUES RAISED

This chapter received considerable support. Main issues arising are :

- Queries raised as to whether the Council has reviewed the boundaries of the Canterbury AHLV following the previous Local Plan examination.
- Kent Wildlife Trust seeks the issue of the impact of development on the internationally or nationally designated sites to be added to Policy LB3.
- Concern that paragraph 10.35 implies that there has been no assessment of impacts on the Thanet Coast and Sandwich Bay SPA and therefore that the plan fails to meet the regulatory requirements of the Conservation of Habitats and Species Regulations 2010.
- Conflict between Policies LB8 and LB12 and the strategic site allocation at Sturry / Broad Oak which contains areas of ancient woodland.
- 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.
- Query soundness of Policy LB10 in relation to requirements of paragraph 165 of the NPPF.
- 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.

CHAPTER 11: OPEN SPACE

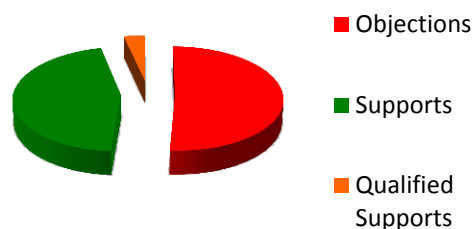
482

246 objections

218 supports

17 qualified supports

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The majority of comments received on this chapter were seeking the designation or categorisation as Local Green Spaces under paragraph 76 of the NPPF of various parcels of land with Kingsmead Field, the area of the UKC Campus south of University Road and Whitstable Beach being promoted most frequently. Designation of Green Gaps also featured highly in responses.

Proposed Local Green Spaces:

- Kingsmead Field
- Whitstable Beach
- Southern slopes of UKC Campus south of University Rd
- Westcliff Meadow, Columbia recreation park, Church St playing fields, Prospect Field, Cornwallis Circle, Whitstable
- Tankerton Slopes, Seasalter Beach, Herne Bay beach and The Downs

A number of additional Green Gaps were proposed, principally between

- Herne and Herne Bay
- Canterbury and Bridge
- Tyler Hill, Blean and Canterbury,
- Rough Common and Upper Harbledown,
- Westbere and the former colliery site
- Hersden and Upstreet

Other matters include

- Strong support for the allocation of land for junior football pitches for Tankerton Football Club (Policy OS3)
- Policy OS4 which allocates land at Ridlands Farm for a football hub is now out of date

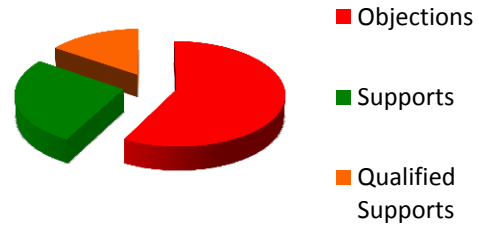
Other matters raised include :

- Play areas need to be improved and a park/play area is needed in South Canterbury for all ages
- Concern raised by the MOD that the pitches at Howe Barracks protected by Policy OS9 are over provided being based on the specific training and fitness requirements placed on MOD personnel.
- Proposal for designation of some of the city of Canterbury's rural hinterland as a form of green belt.
- Paragraphs 11.61 – 11.63 should be incorporated into Policy OS8.
- Policies OS8 and OS9 appear to overlap.
- Request for similar policy to Policy OS14 for publically owned beach hut sites, or for this Policy on allotments to be extended to ensure effective use and care for beach hut sites.

CHAPTER 12: QUALITY OF LIFE

176

102 objections
47 supports
27 qualified supports



This Chapter received a good level of support with only a wide range of other matters raised, including

- Policy QL8 concern voiced both here and to other policies throughout the Plan over the reduction in services at the Kent and Canterbury Hospital and a lack of commitment in QL8 to seek improvements.
- Policy QL8 should include reference to social care as communities must promote integrated services under the health and social care Act 2012
- 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.

ACKNOWLEDGEMENTS

The authors are grateful for the help, advice and support of all officers from Canterbury City Council's Planning Policy Team.

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Ms Avril Leonard
Mr T Whiting
A M Terry
Ms Lynne Broadbent
Mr & Mrs Dey
Julie Rowe

Clerk Barham Parish Council

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Bill Willsmer	
Mr Stephen Griffith	Thanet International Ltd
Mr Jim Pace	Amos Dawton Finn
Fabio Hedayioglu	
Mr John Pike	
A M Bartlett	
Dr Emily Blake	
Cllr James Flanagan	Westgate Ward
Mr Tony O'Sullivan	Chairman Wickambreaux Parish Council
Cllr Charlotte MacCaul	
Mr Philip Wilson-Sharp	
Mrs Janet Hall	
Mrs Jillian Johnson	
Cllr Martin Vye	
Mrs Gail Hubbard	Clerk Bekesbourne with Patrixbourne Parish Council
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Church Commissioners for England	
Mr David Birmingham	
Mr Harvey Blaymire	
Mr Gary Day	McCarthy & Stone Retirement Lifestyles Ltd
Mr Phil Rose	
Mrs Jennifer Bate	PLANNING OFFICER KENT DOWNS AONB
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Dr R B Mallion	
Mr and Mrs Jim and Colleen Howard	
Mr Michael McDonnell	
Mrs Patricia Kane	
Mr John Burden	
Dr Gillian Corble	
Robert & Helen Atkins	
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Mr Jeremy Barton	
Miss Megan Wells	Vice-President (Welfare) Kent Union
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Mark & Dawn Walsh	
Ms Sarah Wood	
Alan & Britta Pearlman	
Mr Robert Keen	
A C Strange	
Leigh Derbyshire	

Dr Michael Forrester	
Ms Pauline Walters	
Roisin Bresnihan	
Mr Peter Boys	
Ms Margaret Derbyshire	
John & Kate Hills	
Ms Helen Gardiner	
Mr Ben Knox	
Dr Robert Jupe	
B J & J M J Carpenter	
Pru Cherry	The Whitstable Road Residents Association
Mr T J Patten	
Mr Martin Ward	
Ms Jayne Ward	
Ms Julie Sargeanty	
Ms Amanda Sparkes	clerk Westbere Parish Council
Mrs & Mrs Edmed	
B O'Byrne	
Pavillion Property group	Pavillion Property
Mr D Gardiner	

Chapter 3

Ms Amanda Sparkes	clerk Westbere Parish Council
Rev Paul Wilson	
Ms Patricia Marsh	Secretary Kent Green Party
Cllr Michael Dixey	
Mr John Ellaby	Acting Chairman St Mildreds Area Community Society
Prof Jan Pahl	Chair Canterbury Society
Professor Clive H Church	
Mr Frederic Stansfield	
Sainsbury's Supermarkets Ltd	
Terrace Hill	
Mr & Mrs R Gaskell	
Mr Phil Rose	
Mr Alan Porter	
Ms Ros McIntyre	
Mr David Wadmore	
Dr Richard Norman	
Mr Philip Wilson-Sharp	
Devine Homes Strand Lucchesi Buchan	
Mr R I Vane-Wright	South Canterbury Residents Association
Mrs Catherine Cantwell	
Mrs Doreen Louren	

Mr Brian Lloyd	Senior Planner CPRE Kent
Mr Tony O'Sullivan	Chairman Wickambreaux Parish Council
Mr Stuart Read	
Roisin Bresnihan	
Mrs Monica Blyth	Parish Clerk Herne and Broomfield Parish Council
Mr George Wilson	George Wilson Developments
Mr Rick Strange	
Mr Richard Marsh	
Mr Paul Watkins	
O W Presland	
Mr Paul Barrett	Chairman Canterbury for Business
Ms Ann Carruthers	Transport Strategy Delivery Manager Kent County Council
Robert & Sandra Shine	
Mr Russell Page	Canterbury Alliance for Sustainable Transport
	Corinthian Land Ltd
Miss L Dowle	
Mr Harry Macdonald	
Mrs Angela Boddy	Secretary Thanet Way Residents Association
K P Poole	
Ms Debbie Salmon	Conservation Officer Policy Kent Wildlife Trust
Mr Robert Atkins	
Mr John Bailey	
Mrs IVD Baker	
Mr MJR Baker	
Ms A Knight	
Mr & Mrs A R Pierce	
Mr John Lister	Lead Adviser Natural England
Mr M P J Baker	
Mr Jeremy D I Baker	
Mr B J Head	Director Crown Products
Mr Christopher Heady	
Ms Margaret Young	
Ms Avril Leonard	
Sarah Harrison	Planning Analyst Southern Water
Mr Chris Lowe	
National Grid	
Mr Jim Pace	Amos Dawton Finn
Cllr James Flanagan	Westgate Ward
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Mr Matthew Hedges	
Mr Brian Buggins	
Ms Louise Spalding	Ministry Of Defence
Mr. Gregory Williams	
Miss Karen Banks	Associate Lee Evans Planning
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Mr Adam Roake	
Mrs Jennifer Bate	PLANNING OFFICER KENT DOWNS AONB
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Church Commissioners for England	
Mr Andrew Lloyd	
Mrs Lynn Saxby	Parish Clerk Waltham Parish
Dr Grainne Evans	
Mr Huw Kyffin and Sheila Kurowska	
Ms Julie Martin	
Mrs Patricia Kane	
Mr Michael McDonnell	
Ms A Sparkes	Canterbury Conservation Advisory Committee
Robert & Helen Atkins	
Councillor Ashley Clark	Canterbury City Council
Mr David Smith	
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Mrs Susan Langdown	
Mr and Mrs Jim and Colleen Howard	
Cllr Charlotte MacCaul	
Mr Jeremy Barton	
Mr Jason Hobbs	Area Manager Homes and Communities Agency
Mr Richard Norman	Vice Chair St Michael's Road Area Residents Association
Prof J H Strange	
Mark & Dawn Walsh	
Ms Sarah Wood	
Alan & Britta Pearlman	
Mr Robert Keen	
Ms Sue Pratt	
A C Strange	
Mr Tom Tomaszewski	
Leigh Derbyshire	
Dr Michael Forrester	
Ms Jennifer Lennard	
Ms Pauline Walters	
Mr Peter Boys	
Ms Margaret Derbyshire	
Mrs Marianne Fearnside	
John & Kate Hills	
Ms Helen Gardiner	
Ms Lucinda Malster	
Ms Sian Pettman	
Mr Ben Knox	
Dr Doreen Rosman	
Dr Robert Jupe	
Dr R B Mallion	

Mrs Ursula Harris	secretary Harkness area Residents Association
Mr Keith Bothwell	
Ms Clare Benfield	
Pru Cherry	The Whitstable Road Residents Association
Daniel & Elizabeth Rikh	
Dr Jeremy Kendall	
Mr Ken Fox & Family	
Ms Rosemary Cane	
Mr T J Patten	
Mr Jonathan A Cane	
Mr Tom Cane	
Mr Martin Ward	
Ms Jennifer Keaveney	
Ms Laura Leahy	
Mr Richard Grayson	
Dr Adam Bartley	
Ms Laura Jowers	
Mr T Whiting	
Mr Brendan Power	
Julie Rowe	
Ms Jayne Ward	
Fabio Hedayioglu	
Mr John Pike	
Mr Jon Linnane	Co Chair Langton and Nackington Residents Association
Mr Graham Cox	Chair (Planning Committee) Whitstable Society
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Newmaquinn Ltd	
Kent College	
Mr & Mrs Bill & Carol Hinchliffe	
Mr Paul Newton	
Gordon and Susan Manley	
Mrs S Shaw	Clerk Lower Hardres Parish Council
Mrs S Shaw	Clerk Petham Parish Council
Mr Malcolm Cumming	
Whitstable Oyster Company Ltd	
Mr Michael Perkins	
Mr John Archer	Regional Environment & Land Use Adviser NationalFarmersUnion
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Mr Clive Flisher	
B.J. Gore	
Ms Judy Seymour - Ure	
Mr J and P Booth	
Mrs Margaret Darby	
Ms Elizabeth Akenhead	British Horse Society

Chapter 4

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Mr Frederic Stansfield	
Ms Ros McIntyre	
Mr Steve Moore	Thanet District Council
Mr Brian Lloyd	Senior Planner CPRE Kent
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Mr Phil Rose	
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Mrs Barbara Hudgell	
Ms Patricia Marsh	Secretary Kent Green Party
Ms Gillian Northcott Liles	Vice-Chairman and Secretary Oaten Hill and District Society
Rev Paul Wilson	
Incafield Ltd	
Dr Richard Norman	
Cllr Michael Dixey	
B.J. Gore	
Mr R I Vane-Wright	South Canterbury Residents Association
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Hendersons	Hendersons Global Investors
Sainsbury's Supermarkets Ltd	
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Dr Grainne Evans	
Mr Harry Macdonald	
Mr. Gregory Williams	
Councillor Ashley Clark	Canterbury City Council
Cllr James Flanagan	Westgate Ward
Mrs Monica Blyth	Parish Clerk Herne and Broomfield Parish Council
Mrs Carol Davis	
Councillor Simon Cook	Canterbury City Council
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Edward & Moria Hughes	
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Newmaquinn Ltd	
Mr John Bailey	
Councillor James Flanagan	Liberal Democrat Group Response
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Ms Ruth Buckland	
Mrs Janet Hall	
Mr Michael Steed	
Mr Ken Fox & Family Harris	
Ms A Knight	
Mr & Mrs T Coleman	
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Mr Michael Perkins	
Ms Elizabeth Akenhead	British Horse Society
Canterbury Christ Church University	

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Mr & Mrs R Gaskell	
Dr Gillian Corble	
Mr Tony O'Sullivan	Chairman Wickambreaux Parish Council
Ms Ros McIntyre	
Mr S Fawke	SPOKES
Mr Alan Best	Swale Borough Council
Mrs Christine Le Jeune	
Mr Cliff Brown	
Miss Margaret Stirling	Secretart Craddock Road Residents Association
Miss Margaret Stirling	
Dr Richard Norman	
Mr. Gregory Williams	
Mrs Chris Molony	Secretary St Stephen's Residents Association
Mr Robert Marshall	
Mrs. Rebecca Smith	

Mr Richard Guest	
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Mr Malcolm Scott	
Mr Graham Cox	Chair (Planning Committee) Whitstable Society
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Mr Phil Rose	
Mr David Parish	
Terrace Hill	
Mrs Jennifer Bate	PLANNING OFFICER KENT DOWNS AONB
Mrs Lynn Saxby	Parish Clerk Waltham Parish
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Mr N J Blake	
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Mr Harry Macdonald	
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Mr Andrew Hall	
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Prof Jan Pahl	Pentland Properties and Crest Strategic Projects
Miss Jane Gallimore	Chair Canterbury Society
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M Hogben	
Mr Stuart Field	
Mrs Janet Hall	
Mr Rick Strange	
Mr J K Rishworth	
Mr David Smith	
St Michael's Road Area R A	Vice-Chair St Michael's Road Area Residents Association
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Mr William Leetham	
Ms Beatrice Shire	
Cllr Alex Perkins	Councillor Canterbury City Council
Mr Andrew Bartlett	
Prof & Mrs Osman & Lorna Durrani	
Mr Richard Norman	Vice Chair St Michael's Road Area Residents Association
S Thorne	
Mr Tony Pringle	Member HIMN
Roisin Bresnihan	

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Mr David Wadmore	
Mrs Ursula Harris	secretary Harkness area Residents Association
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Pru Cherry	The Whitstable Road Residents Association
Mr Philip Norwell	Managing Director Stagecoach South East
Mr Ken Fox & Family	
Mr Kevin Bown	Asset Manager Area 4 (Kent) Highways Agency
Mrs Carol Davis	
Mrs Margaret Darby	
Mrs D Jeffers	
Mr Frederic Stansfield	
Mr Peter Taylor-Gooby	
Mr David Greenway	
Newmaquinn Ltd	
Ms Margaret Young	
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Wortham	
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Dr Noel Bridge	
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Mr Fred Wilson	
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Xhelal Mustafa
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 H Taner
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 C Winters
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clerk Westbere Parish Council

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mr matthew willerton
Mr Russell Blyth
Mrs C L Sullivan
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Mr. Ronnie Nevell
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Mr David Shire
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Chris & Maggie Smith
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Emma & Mark Barrett Palmer
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Ms Vicky Whiting
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Dr Christopher Dawson
Lyvie De Haan
Mr Justin Terry
Mr Brian Dillon
Naomi De Haan
John & Lorraine Hamilton-Box
Mr & Mrs G Scarfe
Mr Paul Barrett
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Land Use Planning Advisor National Trust

Parish Clerk Harbledown and Rough Common Parish Council
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Mr R I Vane-Wright	South Canterbury Residents Association
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Ms Daphne Ellis	
Ms Mary Lerigo	
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Mr James Stevens	Strategic Planner Home Builders Federation
Mr Graham Norton	Land and Planning Director Strategic Land Kent
Mr John Bailey	
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Mr Paul Watkins	
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Mrs F Dingle	
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Mr Ian Rogers	
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Mr John Pye	
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Patrick & Moira Austin	
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Mr John Hedington	
Mr Gerry Atkin	
Ms Hazel Brackley	
Mr Roger Mullaley	
Ms Lorraine Manser	
Mrs D Potts	
Mr Michael Steed	
P Manser	
Ms Sheelagh Deller	
Mr Tony Couperthwaite	
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Mr John Anderson	
Jo and David Pick	
Mr Andrew Thomson	
Ms Claire Dethier	
Mr Peter Welch	
Mr Mike Bodkin	Senior Associate, Planning & Regeneration Peter Brett Assoc

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Prof Jan Pahl	Chair Canterbury Society
Professor Clive H Church	
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Cllr Charlotte MacCaul	
Mr Harry Macdonald	
Ms Patricia Marsh	Secretary Kent Green Party
Dr Richard Norman	
Ms Patricia Marsh	Committee Member Wincheap Society
Ms Ros McIntyre	

Cllr Michael Dixey
 Ms Debbie Salmon
 Brigadier M J Meardon
 Rev Paul Wilson
 Ms Louise Spalding
 Mr David Birmingham
 Ms Lorraine Manser
 P Manser
 Mr. Gregory Williams
 Mr Graham Cox
 Ms Ann Carruthers
 Mrs Jennifer Bate
 Mr Brian Lloyd
 Mr Michael Perkins
 Councillor Ashley Clark
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 Mr Andrew Newell
 Mrs Janet Hall
 Mr Phil Rose
 Miss Gemma Avory
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 Mr James Stevens
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 Ms Sophie Flax
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 Miss Karen Banks
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SPOKES
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 Chair Canterbury Society
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Mr Richard Grayson

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Mr Stephen Metherell

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Mr Rick Strange

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Mr & Mrs R Gaskell	
Ms Patricia Marsh	Secretary Kent Green Party
Mrs Carol Davis	
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Mr Andrew Lloyd	
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Mr and Mrs Gibbon	

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 Mr Mike Walling
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 Mrs Lynn Saxby
 Professor Clive H Church
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 Mr Michael McDonnell
 Mr David Smith
 St Michael's Road Area R A
 Mrs Susan Langdown
 Mr Andrew Bartlett
 Mr Richard Norman
 Prof J H Strange
 Mark & Dawn Walsh
 Ms Sarah Wood
 Alan & Britta Pearlman
 Mr Robert Keen
 Ms Sue Pratt

Canterbury Conservation Advisory Committee
 Acting Chairman St Mildreds Area Community Society
 Chair Canterbury Society

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Dr Michael Forrester	
Ms Jennifer Lennard	
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Mrs Marianne Fearnside	
John & Kate Hills	
Ms Helen Gardiner	
Ms Lucinda Malster	
Mr Ben Knox	
Dr Robert Jupe	
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Mr Huw Kyffin and Sheila Kurowska	
Mrs Ursula Harris	secretary Harkness area Residents Association
Ms Clare Benfield	
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Mr Ken Fox & Family	
Ms Rosemary Cane	
Mr T J Patten	
Mr Jonathan A Cane	
Mr Tom Cane	
Mr Martin Ward	
Ms Laura Leahy	
Mr Richard Grayson	
Dr Adam Bartley	
Ms Laura Jowers	
Mr T Whiting	
Mr Brendan Power	
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Ms Jayne Ward	
Fabio Hedayioglu	
Mr John Pike	
Mrs Patricia Kane	
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Mr Bruce Woodcock	
Mr and Mrs Jim and Colleen Howard	
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Ms Jennifer Keaveney	
Mrs Christine Le Jeune	

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 Mr John Burden
 Devine Homes Strand Lucchesi Buchan
 Mrs S Shaw
 Ms Katharine Rist
 Mr N J Blake
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 Mrs Denise Horswell
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Lead Adviser Natural England

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Vice-Chair St Michael's Road Area Residents Association

Vice Chair St Michael's Road Area Residents Association

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Mr Tony Pringle
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 Ms Helen Gardiner
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Mr Ben Knox
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Dr Robert Jupe
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Ms Louise Spalding

Mr Huw Kyffin and Sheila Kurowska

Mrs Ursula Harris

Ms Clare Benfield

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Daniel & Elizabeth Rikh

Dr Jeremy Kendall

Mr Ken Fox & Family

Ms Rosemary Cane

Mr T J Patten

Mr Jonathan A Cane

Mr Simon Wall

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Ms Laura Leahy

Mr Richard Grayson

Dr Adam Bartley

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Julie Rowe

Ms Jayne Ward

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 The John Graham Centre

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secretary Harkness area Residents Association

The Whitstable Road Residents Association

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Mr Paul McNally	Acting Chair Whitstable Beach Campaign
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Mr S Fawke	SPOKES
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Mr R I Vane-Wright	South Canterbury Residents Association
Mrs Christine Le Jeune	
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Miss Margaret Stirling	
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Mr Paul McNally	
Sian Pettman	Save Kingsmead Field Campaign
Ms Sian Pettman	
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V Pamnani	
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mr james green	director Whitstable Oyster co
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Mrs Janet Hall	
Ms Susi Brain	
Ms Sarah Guest	
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 Mr Tim Elgar
 Mr Terry Whyte
 Ms Lynsey Cole
 Mr Tom Sharp
 MR STEVE BARNES
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 Mr Graham Cable
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 Ms Liz Buckwell
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 Mr Bob Pullen
 Mrs Tina Ismail
 Mr Brett Remington
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 Mr Richard Shaw
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 Mr Laurence Muston
 Mrs Gail Hubbard
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 Mrs Carol Davis
 Mr Phil Rose
 Ms Ros McIntyre
 Mrs Denise Horswell
 Mrs Denise Horswell
 Ms Amanda Sparkes

EastBridge Hospital
 South Canterbury Residents Association

Co Chair Langton and Nackington Residents Association

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Ms Rosemary Cane	

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Mr Bruce Woodcock	
Mr David Smith	
O W Presland	
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Mr George Wilson	George Wilson Developments
Mr David Birmingham	
Ms Cecilia Duggan	
Mr. Gregory Williams	
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Miss Karen Banks

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Mr. Gregory Williams

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Solihin Garrard

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