



# Canterbury District Local Plan to 2040

## Consultation summary report

### 1. Introduction

Consultation on the Draft Canterbury District Local Plan to 2040 (Regulation 18) took place between Monday 11 March 2024 and Monday 3 June 2024.

The Draft Canterbury District Local Plan to 2040 (Regulation 18) was informed by previous consultations undertaken as part of the process of preparing a new Local Plan for the district.

In summer 2020, we consulted widely on the issues affecting our communities. Following consideration of public feedback on these issues, a further consultation took place in summer 2021 where we sought views on a range of options for how the Local Plan could address these issues.

In 2022, we consulted on the previous draft Canterbury District Local Plan To 2045. This resulted in more than 2,000 responses from individuals and organisations and more than 24,000 individual representations.

The purpose of these consultations was to identify the key planning issues and opportunities the new Local Plan should address. The feedback received from you has helped us shape our draft Local Plan and influence the next stages.

This report outlines how the council engaged with the community and stakeholders through the most recent consultation process and sets out the main findings of the consultation, analysis of the comments received and provides copies of all representations made on the draft Local Plan as part of the consultation.

A total of **3,819 responses** were received (1,892 survey responses and 1,927 written representations).

The full comments submitted by each respondent in response to the consultation are set out at **Appendix 2 and Appendix 3**.

The following points should be noted:



- When commenting on a specific policy, some respondents referenced other elements of the plan. This was particularly relevant for Policy C12 (Land north of the University of Kent) and Policy W4 (Land at Brooklands Farm) where mention of both can be found in analysis summaries throughout the plan.
- Responses received from groups of organisations, either representing or with membership of a significant number of people, are considered as single responses within this report.
- Approximately 1% of responses received were duplicate entries submitted by people who had already had their say once. Where possible, subsequent submissions were deleted or combined with a respondent's initial response. Given the low percentage of people that did this, we are satisfied that this has not skewed the final results of the consultation.
- Comments on the Sustainability Appraisal, Habitat Regulations Assessment, and the Sustainability Appraisal of the Strategic Land Availability Assessment will be reported in a separate document.



## 2. Executive summary

A total of **3,819** responses were received from individuals and organisations, comprising of **12,262** individual representations on specific policies across the whole Local Plan.

The full comments submitted by each respondent in response to the consultation are set out at **Appendix 2 and Appendix 3**.

Some **1,892** questionnaire responses were received through the online survey and **1,927** responses were received in writing, such as via email or letter.

Respondents were asked to provide comments on individual policies, including any evidence they may have had to support this. By chapter, some of the key points raised were:

### Chapter 1: Spatial Strategy for the district

- **Vision:** emphasis on protecting open space and nature, with some opposition to Policy C12 and concerns about the feasibility of the draft vision
- **Strategic objectives:** similar concerns about nature protection and Policy C12 was also noted but there was also notable support for objectives related to climate change and sustainability
- **Environmental Strategy:** a focus on protecting green space and farmland, improving drainage infrastructure and preserving cultural distinctiveness
- **Sustainable Design Strategy:** need for infrastructure improvements and protecting open spaces, with support for net zero growth ambitions
- **Development Strategy:** significant concerns about housing growth, the need to protect rural character, and improving road infrastructure to reduce congestion
- **Movement and Transportation Strategy:** importance of public transport improvement was stressed, although there were concerns about the feasibility and impact of proposed changes
- **Infrastructure Strategy:** enhancements in sewerage infrastructure, water supply, health, and education services were deemed important before further housing development.

### Chapter 2: Canterbury

- Land north of University of Kent:
  - Concerns about negative impacts on countryside, ecology, agriculture
  - Issues with traffic and road access
  - Need for infrastructure improvements
- Canterbury City Centre Strategy:
  - Enhancement to heritage and culture needed
  - Utilise empty buildings for housing
  - Suggestions for adjusting parking charges, managing tourism, and increasing police presence



- Positive feedback on cycling provisions, walking paths and revitalising the city centre
- Land at Merton Park:
  - Protection of green spaces
  - Additional road pressure
  - Impact on biodiversity
  - Housing numbers deemed unjustified.

### **Chapter 3: Whitstable**

- Brooklands Farm:
  - Concerns about traffic impact
  - Loss of agricultural land
  - Concerns around sewerage and flooding
  - Infrastructure in need of improvement
- Whitstable Urban Area:
  - Sewerage concerns
  - Implications of development on traffic and congestion
  - Loss of rural landscape
- Bodkin Farm:
  - Traffic concerns
  - Inadequate infrastructure to cope with additional housing.

### **Chapter 4: Herne Bay**

- Town Centre Strategy: support for approach and regeneration seen as positive with concerns for traffic
- Thornden Wood Road: development of new school favourable, some concerns for traffic and loss of green gap.

### **Chapter 5: Rural Areas**

- The Hill, Littlebourne: concerns about unsuitable road infrastructure, limited local infrastructure for schools and GP surgeries, and flooding risks
- Land north of Court Hill: disproportionate scale of development and concerns about sustainability of development
- Rural Service Centres: concerns about inadequate amenities, loss of agricultural land, and the negative impacts development may have on community character
- Land west of Cooting Lane and south of Station Road: some support for providing homes for young families and local people but concerns about poor road infrastructure and risk of harm to natural habitats
- Bread and Cheese Field: concerns about the Sturry link road and the A28's capacity to accommodate additional traffic
- Countryside: need to protect rural identity and concerns about rural roads' capacity



- Broad Oak Reservoir and Country Park: support for nature and recreational provisions, concerns about damage to Stodmarsh, and stronger policy wording needed to protect habitats.

### **Chapter 6: District-wide Strategic Policies**

- Active and sustainable travel: some support for this policy, however people feel that residents would still use cars despite improvements
- Habitats, landscapes and sites of local importance: noted contradictions between this policy and Policy C12 with calls for amendments to the green gaps, and concerns about environmental impacts
- The Blean Woodland Complex: issues raised about damage to woodland
- Sustainable design: support for this policy with some concerns about deliverability and a desire to see more flexibility and evidence with mention of the need for higher density housing and active enforcement
- Rural economy: concerns for the need to protect agricultural land from development and conflict with Policy C12

### **Chapter 7: Development Management Policies**

- Water pollution: concerns around existing sewerage infrastructure
- Sustainable drainage: support for sustainable drainage in new developments
- Light pollution and dark skies: support for the designation of 'dark sky zones'
- Residential design: general support for technical requirements of new homes with some concerns around specific floor to ceiling height specifications.

### **Chapter 8: Carried Forward 2017 Local Plan Policies**

- Strategic Site Allocations: some support for specific development sites with consideration for the protection of nature and a need to improve roads and address congestion issues
- Housing Allocations: concerns about housing numbers and cited need to improve sewerage and water infrastructure
- Pedestrian and Cycle Routes: general support for prioritising active travel over car usage.

### **Chapter 9: Monitoring Indicators**

- Some of the most frequent comments raised biodiversity, improved enforcement of breaches, tree cover and water pollution as indicators.

### **Appendices**

- Of the few comments received, some highlighted the need to broaden the definition of 'rural business' within the glossary and two respondents expressed the need for on-plot tandem parking in Appendix 3.



## 3. Consultation methodology

### 3.1. Methodology

The following methods were used to seek views:

- an online questionnaire (see **Appendix 4**)
- a paper version of the questionnaire
- public events in the following locations:
  - Canterbury (Monday 29 April 2024 and Tuesday 21 May 2024)
  - Whitstable (Wednesday 24 April 2024)
  - Herne Bay (Tuesday 23 April 2024)
- a meeting with all parish councils in the district
- meetings with each of the district's local MPs
- dedicated briefings with amenity groups, business community and groups, as below:
  - Canterbury Society
  - Whitstable Society
  - CT5 Forum
  - Spokes
  - Canterbury Alliance for Sustainable Transport (CAST)
  - Disability Advisory Panel
  - Canterbury Business Improvement District (BID)
  - Alliance of Canterbury Residents' Associations (ACRA)
  
- written representations were also welcome, where **1,927** responses were received.

The consultation was promoted in the following ways:

- an article on the council's newsroom site
- posts on the council's social media channels
- press releases sent to the local media
- correspondence to those that took part in the previous Regulation 18 consultation, those who signed up to the Local Plan contact database, as well as statutory stakeholders.



### 3.2. Respondent profile

This below information, submitted by respondents, relates only to the responses received from questionnaires, both online and paper copy. It excludes profile information on those respondents that submitted written representations.

The vast majority of responses were received from individual residents, with 1.8% (35) responses received by businesses, organisations or community groups. Some respondents listed under 'Other' could be applied to the other profiles.

Respondent type	Percentage
A resident of the city of Canterbury	93% (1,760)
A visitor to the city of Canterbury	1.8% (35)
A worker in the Canterbury district	0.6% (11)
A business, organisation or community group <ul style="list-style-type: none"> <li>- 500+ (<i>FRIENDS OF OLD PARK &amp; CHEQUERS WOOD</i>)</li> <li>- <i>Aspire LPP</i></li> <li>- <i>Canterbury Climate Action Partnership representing c1050 people</i></li> <li>- <i>Canterbury Diocesan Board of Finance Limited. Representing a very large number of people</i></li> <li>- <i>Canterbury District Green Party - 1,000 people</i></li> <li>- <i>Canterbury Eagles FC</i></li> <li>- <i>Canterbury parkrun representing over 20,000 participants by 2040 (currently 8,239)</i></li> <li>- <i>David White</i></li> <li>- <i>DHA Planning - 2 parties</i></li> <li>- <i>DHA Planning (on behalf of H W Twyman)</i></li> <li>- <i>DHA Planning (on behalf of Kent County Council)</i></li> <li>- <i>DHA Planning (on behalf of Woodchurch Property (BK) Ltd)</i></li> <li>- <i>DHA Planning on behalf of Canterbury Christ Church University</i></li> <li>- <i>DHA Planning on behalf of Wedgewood Land &amp; Investments</i></li> <li>- <i>Eastbridge Hospital</i></li> <li>- <i>Esquire Developments</i></li> <li>- <i>Eternal Energy Systems 6 Employees</i></li> <li>- <i>Galliard Homes Ltd</i></li> <li>- <i>Goddard Planning. Representing various landowners and developers.</i></li> <li>- <i>Havelock Street Community Group (HSTCG) 17</i></li> <li>- <i>JIG Planning &amp; Development Limited representing 1 person</i></li> <li>- <i>Land Agent representing a Landowner</i></li> <li>- <i>Little Stour &amp; Nailbourne River Group</i></li> </ul>	1.8% (35)



<ul style="list-style-type: none"> <li>- Littlebourne &amp; Stodmarsh Roads Community Association</li> <li>- PJArchitecture, Whitstable - representing our client base</li> <li>- Rebus Planning Solutions representing 1 person</li> <li>- Rural and Community Housing Enabling Service (RACE) 2 people</li> <li>- SOS WHITSTABLE</li> <li>- Southern Water</li> <li>- Swifts Local Network: Swifts &amp; Planning Group, comprises eleven national experts representing over 130 local swift conservation groups.</li> <li>- Thanet Way Residents Association; 180 people</li> <li>- THE CANTERBURY SOCIETY 294 MEMBERS</li> <li>- Wharfe Rural Planning - circa 10</li> <li>- Whitstable Medical Practice</li> </ul>	
<p>A city, county, parish or town councillor</p> <ul style="list-style-type: none"> <li>- Hersden Parish Council (consisting of 9 parish councillors)</li> <li>- Chestfield Parish Council (representing 1,500 households)</li> </ul> <p>NB: 2 respondents did not provide details</p>	0.2% (4)
<p>An MP</p>	-
<p>Other</p> <ul style="list-style-type: none"> <li>- A regular conservation volunteer for Kent Wildlife Trust Trest</li> <li>- Agent on behalf of a landowner</li> <li>- Brooklands Farm Development I object</li> <li>- Chair of Governors Blean Primary School</li> <li>- Corinthian (Mountfield) Ltd. Applicant for South Canterbury / Mountfield Park</li> <li>- Denton Homes - a developer with an interest in land at Fordwich.</li> <li>- DHA Planning on behalf of BDW Kent</li> <li>- DHA Planning on behalf of Persimmon Homes</li> <li>- Dover resident live in Aylesham</li> <li>- Family are from Blean, will be visiting more and more.</li> <li>- Former resident and now visitor</li> <li>- Former resident/occasion resident.</li> <li>- I grew up in Greenhill and my family live there.</li> <li>- I lived in Blean for much of my life and have family in Blean and Tyler Hill</li> <li>- I was born and raised in Canterbury district and regularly return to visit family.</li> <li>- J.Scott, Finn's on behalf of Mr P Anderson</li> <li>- J.Scott, Finn's on behalf of Mr P Anderson, Landowner</li> <li>- J.Scott, Finn's on behalf of Mrs S Leidig, Landowner</li> <li>- J.Scott, Finn's on behalf of the Prior Brothers and Sisters of the hospital of St John the Baptist</li> <li>- J.Scott, Finn's, on behalf of St Nicholas Court Farms Ltd</li> <li>- J.Scott, Planning Consultant, Finn's on behalf of various</li> </ul>	2.5% (47)





<p><i>Clients</i></p> <ul style="list-style-type: none"> <li>- <i>Jane Scott, Finn's on behalf of Mr D O'Brien, Landowner</i></li> <li>- <i>Landlord</i></li> <li>- <i>Member of Kent Wildlife Trust</i></li> <li>- <i>Moving to Whitstable on August 7th 2024</i></li> <li>- <i>Mrs J Scott, Planning Consultant, Finn's on behalf of Mr Baker-White, Landowner</i></li> <li>- <i>National advisory public body; statutory consultee</i></li> <li>- <i>Neighbouring parish resident</i></li> <li>- <i>on behalf of a landowner</i></li> <li>- <i>Park run volunteer</i></li> <li>- <i>Planning Consultant on behalf of a client</i></li> <li>- <i>Planning Consultant on behalf of Save the Blean</i></li> <li>- <i>Previous Littlebourne resident</i></li> <li>- <i>Property owner</i></li> <li>- <i>Resident</i></li> <li>- <i>Resident</i></li> <li>- <i>Secretary of the Grasmere Village Residents' Association, Chestfield</i></li> <li>- <i>Site promoter and developer with contractual landowner agreements</i></li> <li>- <i>Sittingbourne resident with an interest in Blean Woods and North Downss</i></li> <li>- <i>Soon to be resident of Whitstable</i></li> <li>- <i>Student at the University of Kent and resident of Thanet Area</i></li> <li>- <i>Student of University of Kent</i></li> <li>- <i>The Environment Agency</i></li> <li>- <i>Used to be a resident</i></li> <li>- <i>Whitstable resident</i></li> <li>- <i>Woodland Trust</i></li> </ul>	
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The highest proportion of respondents were aged between 45 and 74:

Age	Percentage
Under 18	0.5% (9)
18 to 25	2.9% (55)
26 to 34	5.7% (107)
35 to 44	13.1% (247)
45 to 54	18.8% (355)
55 to 64	21.8% (413)



65 to 74	20.8% (394)
75 to 84	9.2% (175)
85 and above	0.8% (16)

*NB: 121 respondents (6.4%) did not give their age*

Responses by gender were well balanced with slightly more females responding than males:

Gender	Percentage
Male	41% (776)
Female	51.5% (974)
Prefer to self-describe	0.5% (9)

*NB: 133 respondents (7%) did not give their age*



## 4. Analysis of written comments

### 4.1. Chapter 1: Spatial Strategy for the district

Chapter 1 set out the District Vision and Strategic Objectives which inform all policies within the draft plan. The chapter included policies reflecting five key strategies for environment, sustainable design, development, movement and transportation and infrastructure which together comprised the overall strategy for managing growth and development in the district to 2040.

Overall, Chapter 1 received **2,695** written comments. A higher number of comments were received on the outlined Vision and Policy SS3 (Development strategy for the district) but overall, this Chapter received a high volume of feedback.

It is worth noting that many respondents used Chapter 1 to emphasise their specific objection to Policy C12 (Land north of University of Kent).

For **Vision for the District**, roughly half of comments stressed the importance of protecting open space and nature. Similarly, almost half of comments on the vision stated their opposition for Policy C12. Other comments highlighted the need for more infrastructure and felt that the draft plan's vision was unfeasible and contradictory.

For **Strategic objectives**, similar comments around the protection of nature and Policy C12 were raised. However, nearly a quarter of comments showed support for the objectives with encouragement around climate change and sustainability.

For **Policy SS1 - Environmental strategy for the district**, nearly a half of comments related to the protection of open space and farmland. Other comments highlighted the need to improve drainage infrastructure and protect cultural distinctiveness.

For **Policy SS2 - Sustainable design strategy for the district**, comments around infrastructure improvement and the protection of open space were among the highest received. Respondents' comments also expressed support for the council's ambitions for net-zero growth.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.

For **Policy SS3 - Development strategy for the district**, the level of housing growth was raised as a significant concern. Other comments emphasised the need to protect the district's rural character. A high proportion of comments also suggested improvements to roads to avoid further congestion issues.



For **Policy SS4 - Movement and transportation strategy for the district**, respondents felt that improvements to public transport are imperative. This related strongly to congestion concerns and a fear that development would worsen this. However, despite recognising that active travel improvements are necessary, over one third of comments expressed that the proposed public transport improvements would not work.

For **Policy SS5 - Infrastructure strategy for the district**, enhancements in sewage and water supply are deemed important. Respondents also want to see improvements to health and education services before the development of more houses.



## 4.2. Chapter 2: Canterbury

Chapter 2 included the Vision for Canterbury together with the Canterbury City Centre Strategy. The chapter set out the strategic policy framework for development in the urban area of Canterbury and included site allocation policies for a range of developments across the city, including a strategic development area to the south west of the city and a new freestanding settlement to the north of the city.

Overall, Chapter 2 received **2,960** written comments. A higher number of comments were received for Policy C12 (Land north of University of Kent), Policy C1 (Canterbury City Centre Strategy), and Policy C6 (Land at Merton Park).

For **Policy C12 - Land north of University of Kent** a substantial amount of concerns were raised, primarily about the site's negative impact on the countryside, greenfield land, ecology, and agriculture. Traffic increase and road access issues were also significant worries, along with potential harm to wildlife and endangered species. Others expressed concerns about the need for infrastructure improvements, increased pollution and poorer air quality, sewerage management, and the potential loss of the surrounding villages' character and community. The lack of current healthcare facilities, the proposed demolition and rebuilding of Blean Primary School, and deficiencies in the local plan and its alignment with existing policies were also highlighted.

For **Policy C1 - Canterbury City Centre Strategy**, many comments highlighted the need to enhance heritage and culture in the city. Comments also emphasised a need for more traffic restrictions and reductions. Others suggested utilising empty buildings for housing development and improving public transport with additional calls for better shops and a move away from unregulated vape or phone repair shops that some respondents felt are overcharging for 'tat' products. Concerns also included the strategy's potential negative impact on residents given that there is not enough space or infrastructure to support its aims. They also highlighted their opposition to new housing, and the importance of supporting existing businesses. Some feared that the policy's emphasis on regeneration could harm the city centre by compromising the city centre's historic character if not carefully managed. They also argued that simply moving traffic does not solve the underlying issues. Suggestions included adjusting parking charges to attract more visitors, managing tourism to align with local needs, increasing city centre policing, and retaining car parks. Some positive feedback highlighted the addition of more cycling and walking paths, while other comments emphasised the need to revitalise the city centre, keep the market, and address the plan's feasibility and funding.

For **Policy C6 - Land at Merton Park**, the most frequent issues raised were around the loss of green spaces, as well as the additional pressure on roads despite the promotion of active travel. Respondents also expressed worries about the negative impact on biodiversity and sought improved mapping to more clearly illustrate the proposals. Many believe local



infrastructure will not cope with the proposed development, and the housing numbers were seen as unjustified by some.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.



### 4.3. Chapter 3: Whitstable

Chapter 3 included the Vision for Whitstable together with the Whitstable Town Centre Strategy. The chapter set out the strategic policy framework for development in the urban area of Whitstable and included site allocation policies including a strategic development area to the south of Whitstable and a new secondary school at Chestfield.

Overall, Chapter 3 received **3,187** written comments. Policy W4 (Land at Brooklands Farm) received extensive feedback from the community, this was followed by a high number of comments for Policy W3 (Whitstable Urban Area) and Policy W6 (Bodkin Farm).

For **Policy W4 – Land at Brooklands Farm**, the most significant concerns related to increased traffic and transport infrastructure, sewerage issues, healthcare provision, and impacts on the environment and biodiversity. There were also substantial concerns about flooding risks and the preservation of green space and farmland. Many highlighted the area's overpopulation due to numerous other recent developments, stressing the need to maintain water supplies and reduce pressure on schools. Additional concerns included pollution, negative effects on residents' health and well-being, and inadequacies in local infrastructure and facilities. There was also opposition to the proposal without specified reasons and a view that the scale of development is too large. Comments further noted that the housing would not be affordable or targeted towards local people, and the development would negatively impact the local area's character and potentially increase crime.

For **Policy W3 – Whitstable Urban Area**, the most frequent issues raised were sewerage concerns, increased traffic, and the impact on wildlife and the environment. Many respondents emphasised the importance of preserving the rural landscape and farmland, with significant worry about the strain on healthcare facilities. Other notable concerns included flooding risks, overpopulation, and the requirement for additional schools.

For **Policy W6 – Bodkin Farm**, over half of respondents stated their objection to development at this site. Key concerns included increased traffic, sewerage issues, and the need for improved infrastructure. Many respondents stressed the importance of protecting wildlife and green spaces, as well as addressing flooding and drainage issues. Concerns were also raised about the impact on healthcare provision and the prevalence of other developments in the area. Some comments emphasised the need to preserve farmland and highlighted worries about child safety, ensuring social housing is for local people, and maintaining the character of the existing settlement. There were also comments advocating for the preservation of the green gap, noting the negative impact on residents' well-being, and welcoming new school facilities.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.



## 4.4. Chapter 4: Herne Bay

Chapter 4 included the Vision for Herne Bay together with the Herne Bay Town Centre Strategy. The chapter set out the strategic policy framework for development in the urban area of Herne Bay and includes site allocation policies including a new secondary school in Greenhill.

Overall, Chapter 4 received **225** written comments. A higher number of comments were received for Policy HB4 (Land to the west of Thornden Wood Road) and Policy HB1 (Herne Bay Town Centre strategy).

For **Policy HB4 - Land to the west of Thornden Wood Road**, particular concerns about traffic congestion and the impact of additional housing were noted. Many opposed building in the green gap and emphasised the need to preserve the existing natural landscape. While there was support for new schools, some argued that a new school is not necessary and suggested expanding existing schools instead. Other comments highlighted concerns about sewerage and insufficient infrastructure to handle more houses and cars. Additionally, the importance of ensuring new housing developments are for local people and consideration for affordable housing was also stressed.

For **Policy HB1 - Herne Bay Town Centre Strategy**, the most frequent views included support for the approach to development, though some concerns were raised about the new road layout opposite the pier, which increased traffic. Respondents stated that the draft plan didn't respond to local needs and there were specific calls for road and infrastructure improvements. Others called for more leisure and tourism development, including a hotel. Comments raised other issues, including insufficient parking on main streets, the need to regenerate the bandstand area, and inadequate infrastructure for the proposed changes.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.





## 4.5. Chapter 5: Rural areas

Chapter 5 set out the strategic policy framework for development in the rural areas of the district, including the settlements which are classified as Rural Service Centres and Local Service Centres and the countryside. The chapter included site allocation policies at a number of the district's most sustainable rural settlements to support the vitality of these villages and provide some local affordable housing.

Overall, Chapter 5 received **1,056** written comments. A higher number of comments were received for Policy R7 (The Hill, Littlebourne), Policy R8 (Land north of Court Hill) and Policy R1 (Rural Service Centres). Other policies that received a larger number of comments included Policy R12 (Land west of Cooting Lane and south of Station Road), Policy R5 (Bread and Cheese Field), Policy R19 (Countryside), and Policy R17 (Broad Oak Reservoir and Country Park).

For **Policy R7 – The Hill, Littlebourne** and **Policy R8 – Land north of Court Hill, Littlebourne** a significant proportion of respondents on these policies felt that existing road infrastructure was unsuitable to accommodate extra traffic. Separate concerns related to limited local infrastructure capacity with reference to schools and GP surgeries being unable to cope with population growth. Many expressed worries about significant sewerage and water supply issues, with widespread concerns for flooding risks and the impact of this on ecology and wildlife. Some noted the disproportionate scale of proposed development relative to Littlebourne's existing size and the proposals failure to meet sustainable development standards. Comments for both policies mentioned recent extensive development in Littlebourne, unsafe conditions for walking and cycling, and accessibility issues due to narrow roads.

For **Policy R1 – Rural Service Centres**, the most frequent concern was the existing amenities and services are inadequate to support further development. Many supported the proposed scale of development but worried about the loss of prime agricultural land, deeming the level of growth disproportionate to rural living. Others' comments raised concerns about the threat that development would pose to existing communities' character and the exacerbation of traffic congestion due to inadequate road infrastructure.

For **Policy R12 – Land west of Cooting Lane and south of Station Road, Adisham**, respondents primarily raised concerns about unsuitable road infrastructure, degradation of natural wildlife habitats, and the need for more parking spaces. While some supported development to provide homes for young families, others cited concerns about the impacts of sewerage, noise, light, and air pollution.

For **Policy R5 – Bread and Cheese Field, Hersden**, highlighted concerns included the Sturry link road and A28's capacity to handle additional development traffic, insufficient existing infrastructure, and the need to protect the countryside. Many respondents



advocated for a green gap to maintain separation between the villages of Hersden and Westbere and, for Westbere, to protect its rural and historic character.

For **Policy R19 – Countryside**, comments emphasised protecting rural identity and character, limiting or halting countryside development, and safeguarding nature. Concerns were also raised about rural roads' capacity, with calls to improve roads and general infrastructure. Respondents felt that the protection of the countryside was important as it provides opportunities for leisure and recreation.

For **Policy R17 – Broad Oak Reservoir and Country Park**, the importance of planning for a fresh water supply was stressed, in addition to the support for nature and recreational provisions. Other concerns were raised about enforcement and deliverability, potential damage to Stodmarsh from filling the reservoir, and the need for stronger policy wording to protect sensitive habitats. There were also comments to protect the Sarre Penn and general unease about the loss of farmland.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.



## 4.6. Chapter 6: District-wide strategic policies

Chapter 6 set out the strategic policies which would apply to planning applications for different types of development across the district. The chapter included key district-wide strategic policies on a wide range of matters such as housing and new communities, employment and the local economy, movement and transportation and open space, natural and historic environment.

Overall, Chapter 6 received **1,679** written comments. A higher number of comments were received for Policy DS14 (Active and sustainable travel), DS19 (Habitats, landscapes and sites of local importance), and Policy DS23 (The Blean Woodland Complex). Policy DS6 (Sustainable design) and Policy DS12 (Rural economy) also received more comments than other policies contained within this Chapter.

For **Policy DS14 – Active and sustainable travel**, the most frequent concern was that the policy is not deliverable, followed by worries that development would increase vehicle use. Respondents felt that residents would still use their cars despite the promotion of active travel and these people called for improved bus services. Support was seen for this policy, with extra suggestions for better consideration of rural communities and improvements to cycle and footpath infrastructure.

For **Policy DS19 - Habitats, landscapes and sites of local importance**, comments frequently objected to Policy C12 and noticed contradictions between Policy DS19 and others, including Land to the north of University of Kent. While some did support this policy, there were calls for amendments to the green gaps, more clarity and extra detail. Comments also emphasised concerns about environmental impact and the importance of retaining and enhancing local landscapes. Others found the policy overly restrictive and suggested building in flexibility.

For **Policy DS23 – The Blean Woodland Complex**, the most frequent issues raised were about the consequences of development and the damage this would cause to the woodland. These respondents supported the protection of the area's integrity and connectivity to Blean Woods. There were also suggestions to extend the policy to surrounding areas.

For **Policy DS6 – Sustainable design**, respondents showed support for the policy while raising some concerns about its viability and deliverability. There were calls to strengthen requirements for EV charging, solar panels, low carbon heating, and sustainable water usage. Some also felt that the policy should be more flexible and better evidenced with mention of the need for higher density housing and active enforcement.

For **Policy DS12 – Rural economy**, respondents stressed the need to protect good quality agricultural land from development. Many commented that the protection afforded to best and most versatile agricultural land conflicts with Policy C12 (Land north of the University of



Kent). Some emphasised the importance of the rural economy, while others stated the need to protect the character of rural areas.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.



## 4.7. Chapter 7: Development management policies

Chapter 7 provided the set of detailed, non-strategic policies, which would apply to planning applications for different scopes of development across the district unless they are replaced by Neighbourhood Development Plans.

Overall, Chapter 7 received **312** written comments. A higher number of comments were received for Policy DM16 (Water pollution), DM15 (Sustainable drainage), DM18 (Light pollution and dark skies) and DM11 (Residential design).

For **Policy DM16 - Water pollution**, a number of comments highlighted the inadequacy of existing sewerage infrastructure which linked to some comments calling for additional funding.

For **Policy DM15 - Sustainable drainage**, there was general support for the council's expectation on all developments to integrate sustainable drainage systems. Other comments felt that this policy overlaps too strongly with Policy DS20.

For **Policy DM18 - Light pollution and dark skies**, there was general support for the policy but some did feel that certain site allocations contradict it. As well as this, numerous respondents encouraged the council to designate specific areas in the district as 'dark sky zones' and apply these to more areas of the district.

For **Policy DM11 - Residential design**, some of the most frequent comments expressed support for the policy. Some respondents had concerns around specifying floor to ceiling heights within policy, others wanted to see specific reference to energy efficiency measures.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.



## 4.8. Chapter 8: Carried Forward 2017 Local Plan Policies

Chapter 8 included policies from the 2017 Local Plan which the council will continue to apply over the period of this Local Plan.

Overall, Chapter 8 received **111** written comments. Compared to other elements of the draft plan, this Chapter did not receive a large volume of comments. However, a higher number of comments were received for Policy CF1 (Strategic Site Allocations), CF2 (Housing Allocations), CF3 (Pedestrian and Cycle Routes).

For **Policy CF1 – Strategic Site Allocations**, a number of comments highlighted the need to improve roads and address congestion. Some respondents supported or suggested considering specific sites for development, while others advocated for building more houses. There were calls to protect nature and open spaces, and to improve general infrastructure before more increasing house building.

For **Policy CF2 – Housing Allocations**, respondents primarily highlighted the need to improve sewerage and water infrastructure. Comments also covered concerns about the number of houses, and consideration of specific site submissions.

For **Policy CF3 – Pedestrian and Cycle Routes**, respondents generally supported the policy. Some highlighted the need to improve cycle parking and include maps of proposals with support for prioritising active travel over car usage.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.



## 4.9. Chapter 9: Monitoring Indicators

Chapter 9 identified matters that the council will develop a series of Local Plan monitoring indicators for and sought feedback and suggestions on these.

Overall, Chapter 9 received **20** written comments.

Some of the most frequent comments raised biodiversity, improved enforcement of breaches, tree cover and water pollution as indicators.

An analysis of the comments received on this Chapter is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.



## 4.10. Appendices

This section of the plan included three appendices to the Local Plan.

Overall, the Appendices received **17** written comments.

On Appendix 1: Glossary, comments highlighted the need to broaden rural business definition and one respondent stated that affordable housing is not affordable.

On Appendix 2: Commuted sums calculator, one person stated general objection.

On Appendix 3: Parking standards, some respondents cited the need for on plot tandem parking, one respondent also requested extra detail to cycle parking standards.

An analysis of the comments received on the appendices is set out at Appendix 1. The full responses are available to view at Appendix 2 and 3.

## 5. Appendices

Appendix 1: Qualitative analysis of responses (tables)

Appendix 2: Written representations

Appendix 3: Survey responses

Appendix 4: Survey questionnaire