

# Draft Canterbury District Local Plan to 2040

## Chapter 7: Development Management Policies

Policy	Number of written comments
Policy DM1: Conversion of existing rural buildings	13
Policy DM2: Residential garden land	19
Policy DM3: Housing in multiple occupation (HMOs)	12
Policy DM4: Reducing waste and supporting the circular economy	15
Policy DM5: Parking design	21
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Policy DM13: Biomass technology	14
Policy DM14: Flood risk	19
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Policy DM17: Noise pollution and tranquillity	15
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Policy DM19: Contamination and unstable land	7
Any other comments	8
<b>Total comments</b>	<b>312</b>

## **Policy DM1: Conversion of existing rural buildings**

- Support policy: 4 comments
- Policy needs to be actively enforced: 1 comment
- Farm building change of use should be permitted: 1 comment
- Should not impact landscape, ecology or biodiversity: 1 comment
- Not compliant with national policy: 1 comment
- Object to Brooklands Farm (W4): 1 comment
- Objection to Highland Court (Canterbury Business Park): 1 comment

## Policy DM2: Residential garden land

- Support policy: 4 comments
- Will increase surface water run-off and flooding: 4 comments
- Not compliant with national policy/more closely align: 2 comments
- Policy needs to be actively enforced: 1 comment
- Policy needs to be strengthened: 1 comment
- Should be a minimum garden retention: 1 comment
- Prevent impact on privacy, overlooking or overshadowing: 1 comment
- Will impact biodiversity: 1 comment
- Should demonstrate nutrient neutrality: 1 comment
- Object to Brooklands Farm (W4): 1 comment

## Policy DM3: Housing in multiple occupation (HMOs)

- Support policy: 4 comments
- Add reference to the maintenance and regulation of HMOs: 2 comments
- No need for further HMOs (with adequate student accommodation): 2 comments
- Policy needs to be actively enforced: 1 comment
- New build HMOs should not be permitted on green space: 1 comment
- (7.4) HMOs should be for people of any age: 1 comment
- Use to house asylum seekers: 1 comment

## Policy DM4: Reducing waste and supporting the circular economy

- Support policy: 6 comments
- Strengthen policy: 2 comments
- Policy needs to be actively enforced: 1 comment
- Include reference to management and enforcement: 1 comment
- Standardisation of collection methods: 1 comment
- Should implement a contractor scheme: 1 comment
- Use of better resources will help to decrease waste: 1 comment

## Policy DM5: Parking design

- Support policy: 4 comments
- Support the requirement for permeable paving: 4 comments
- Policy to support tandem parking 4 comments
- Need more parking: 3 comments
- Improve accessibility (size of bays, payment for parking etc): 3 comments
- Signage, markings and lighting must be adequate and sustainable: 2 comments
- Reduce parking where possible to encourage sustainable travel: 2 comments
- More infrastructure to support sustainable travel (charge points, cycle parking etc): 2 comments
- Add requirement for plants: 1 comment
- Ensure no impact on walking and cycling routes: 1 comment
- Consider underground parking: 1 comment

## Policy DM6: Extensions and alterations to existing buildings

- Support policy: 7 comments
- Improve enforcement and implementation: 3 comments
- Policy needs to be actively enforced: 1 comment
- Policy should be weakened: 1 comment
- Allow to maximise occupancy: 1 comment
- Policy needs more detail - too brief and too subjective: 1 comment

## Policy DM7: Health and crime impact assessments

- Support policy: 4 comments
- Policy needs to be actively enforced: 1 comment
- Further focus on crime is required: 1 comment
- Consider the impact of road design and housing layout: 1 comment
- Consider the health impact of certain industrial uses (e.g. vape shops): 1 comment
- Social impact statements to be required as part of health and crime impact assessment: 1 comment
- Outline in policy how crime will be mitigated through development: 1 comment



## Policy DM8: Shopfronts

- Support policy: 8 comments
- Policy needs to be actively enforced: 3 comments
- Need to be more selective about types of shops: 1 comment

## Policy DM9: Advertisements

- Support policy: 6 comments
- Policy needs to be actively enforced: 3 comments
- Reference to the content of adverts and what they promote (e.g. unhealthy diets): 1 comment

## **Policy DM10: Residential annexes and ancillary accommodation**

- Support policy: 2 comments
- Policy needs to be actively enforced: 1 comment
- Annexes and ancillary accommodation should be more widely supported: 1 comment
- Should result in no loss of privacy, overlooking, or overshadowing: 1 comment

## Policy DM11: Residential design

- Support policy: 6 comments
- Floor to ceiling height is above average should not be mandatory (prevents from being in keeping with local character): 3 comments
- Include reference to energy efficiency measures (with reference to orientation): 3 comments
- Certain criteria are excessive and should be removed / remove additional requirements outside of National Space Standards: 2 comments
- High density housing should be permitted and prioritised (flats and town houses): 2 comments
- Would ceiling height requirement apply to apartments?: 2 comments
- How will dual or triple aspect requirement apply to terrace accommodation?: 2 comments
- Policy needs to be actively enforced: 1 comment
- Include heritage: 1 comment
- Stronger requirements in relation to daylight: 1 comment
- Urban design concept reports should be required for large developments: 1 comment
- Boundary treatments should be appropriate to local character: 1 comment
- Include reference to biodiversity: 1 comment
- Support the inclusion of permeable paving: 1 comment
- Include reference to tree retention: 1 comment
- Not compliant with national policy: 1 comment
- Support inclusion of tree planting: 1 comment
- Amenity space should be accessible to all (including roof terraces): 1 comment

## Policy DM12: Non-residential design

- Support policy: 3 comments
- Supports inclusion of permeable paving policy: 2 comments
- Policy needs to be actively enforced: 1 comment
- Support biodiversity reference: 1 comment
- Reference to energy efficiency measures (including relevance of building orientation): 1 comment
- Requirements of criteria need weakening: 1 comment

## Policy DM13: Biomass technology

- Support policy: 2 comments
- Strengthen policy to ensure that it is sustainable (locally sourced biomass and low emission technology): 2 comments
- Unsustainable: 2 comments
- Policy lacks meaning: 2 comments
- Strengthen policy to consider landscape, heritage and local character: 1 comment
- Needs to be full traceability for biomass technology: 1 comment
- Encourage to use alternative, such as electric/heat pumps: 1 comment
- Will not help to achieve air quality goals: 1 comment
- Bad for human health: 1 comment
- Should not be permitted at all: 1 comment

## Policy DM14: Flood risk

- Supports policy: 5 comments
- Development should not increase flood risk in surrounding areas or on surrounding infrastructure: 5 comments
- Should not build in flood zones: 2 comments
- Objection to C12 due to flood risk: 2 comments
- Flood risk assessments should be undertaken independently from developers: 1 comment
- Flood risk should be wholly the responsibility of developers: 1 comment
- SuDS impact on heritage should be considered and mitigated: 1 comment
- Include mitigation measures: 1 comment
- Flooding is increasing: 1 comment
- Further clarification on sequential test (e.g. scope): 1 comment
- No further residential development: 1 comment

## Policy DM15: Sustainable drainage

- Support policy: 9 comments
- Policy overlaps with DS20: 4 comments
- Needs to be actively enforced and maintained: 2 comments
- Strengthen policy: 1 comment
- Responsibility to be wholly the developers: 1 comment
- Stronger standards of protection for source protection zones: 1 comment
- Water pollution concerns: 1 comment
- Increased flexibility in SuDS design: 1 comment
- Large developments to contains SuDS: 1 comment
- Infrastructure to be prioritised and phased prior to dwellings: 1 comment
- Use of greywater: 1 comment
- More work required: 1 comment
- Consideration of heritage impacts: 1 comment
- Policy to provide examples: 1 comment
- Include reference to agriculture: 1 comment



## Policy DM16: Water pollution

- Inadequate existing wastewater sewage infrastructure: 5 comments
- Support policy: 3 comments
- More funding needs to be provided: 3 comments
- Water pollution needs preventing: 2 comments
- Risk assessments should be independent from developers: 1 comment
- Water pollution should be monitored: 1 comment
- Increased surface run-off from developments will increase pollution: 1 comment
- No recognition of existing issues: 1 comment
- Development without sewage provision should not be permitted: 1 comment
- Needs to be actively enforced: 1 comment
- Consider nature-based solutions: 1 comment
- Objection to W4: 1 comment

## Policy DM17: Noise pollution and tranquillity

- Support policy: 4 comments
- Include policy relating to tranquillity: 2 comments
- Include consideration for the ecological impacts: 1 comment
- Should be a strategic policy: 1 comment
- Bus Strategy will increase this pollution: 1 comment
- Include visual pollution (overlooking and loss of privacy): 1 comment
- Traffic is a large cause of pollution: 1 comment
- There is nothing in the site allocations to mitigate this: 1 comment
- Use contractor schemes: 1 comment
- Pollution increasing: 1 comment
- Needs actively enforcing: 1 comment

## Policy DM18: Light pollution and dark skies

- Support policy: 10 comments
- Site allocations contradict the policy: 4 comments
- Review dark sky regions - the policy should apply to more of the district: 3 comments
- Consider reference to lighting temperatures: 2 comments
- Consider reference to the use of timing devices: 2 comments
- Needs actively enforcing: 1 comment
- Include strict policy on use of flood lighting: 1 comment
- Policy to manage existing use of lights: 1 comment
- Further clarity on external lighting schemes: 1 comment

## **Policy DM19: Contamination and unstable land**

- Support policy: 2 comments
- Work should be undertaken by an independent agency not developers: 1 comment
- Should never permit housing development on landfill sites: 1 comment
- Landfill sites should become public access land: 1 comment

## Any other comments

- Object to the Local Plan: 1 comment
- Support the DM policies: 1 comment
- Consider commitment to Doughnut economics: 1 comment
- Formatting of the local plan is difficult to read: 1 comment
- Certain policies should be strategic rather than development management policies: 1 comment