

**Draft Canterbury District Local Plan to 2040**

**(Regulation 18) Consultation 2024**

**Response from CPRE Kent**

**Introduction**

We are CPRE Kent, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with more than 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches, representing more than 1,400 individual members or groups.

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside. Our countryside is a priceless national non-renewable resource. CPRE's core objective is to protect and enhance the beauty and tranquillity of the English countryside. This shapes our approach to land supply for new homes.

Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

This response has been prepared jointly by the Kent Branch office of CPRE Kent and by the Canterbury District Committee of CPRE Kent, but for brevity our comments are expressed as being from 'CPRE Kent' throughout this response.

Ahead of our detailed comments, we have the following overarching comments:

**CPRE Kent's comments on the last draft plan**

CPRE Kent is pleased to see that a number of comments we and others made regarding the previous plan have clearly been accounted for in the formation of this draft. In particular:

- We strongly welcome and support the removal of the clearly unsustainable greenfield site at Cooting Farm (R1).
- We welcome and support the shortening of the plan period and the corresponding reductions in identifying yet further allocations this brings.
- We welcome and support the removal of the Canterbury Circulation Plan the Eastern Movement Corridor. This includes the deletions of the site allocations at East Canterbury, which would have delivered a significant proportion of the corridor.
- We welcome the removal of the site allocation at Golden Hill (W7).
- We welcome and support the commitment to incorporate measures to deliver a minimum 20% biodiversity net gain. It is important that this is given strong support by the Council as we have seen similar policy aspirations watered down elsewhere in Kent after lobbying from the development industry.
- We also welcome and support the revised Transport Strategy and its focus on achieving a realistic chance of modal shift through the clear focus on improving bus provision.

Notwithstanding this, it is clear that this draft of the plan still does not go far enough and it is disappointing that many of our previously-made comments appear to have been ignored. Accordingly, we still have significant concerns that this draft plan does not constitute a sustainable or sound plan.

It is therefore the case that, where no substantive changes have been made between the previously-consulted-upon draft and the current draft plan, all previously-made comments still stand.

### **CPRE Kent's overarching concerns**

While our detailed comments against the relevant policies are provided below, we raise the following overarching concerns that are relevant to all aspects of the plan.

#### **1. Continued failure to properly consider whether exceptional circumstances exist to allow for a lower housing target starting point.**

We consider that it is extremely disingenuous for officers to be categorically advising Council members and the public that there are no exceptional circumstances to deviate from the standard method when it remains that they still have not evidenced this. While CPRE Kent members have been advised by Canterbury City Council (CCC) that the Housing Needs Assessment (HNA) undertaken by Edge Analytics sufficiently covers the point, this is simply not the case. Significantly, the 2021 HNA that considered the case for exceptional circumstance was undertaken prior to the 2023 changes to the NPPF and the release key Census data. It also predates the recognition by the ONS that its approach to student population calculations is flawed.

In particular, the revised wording of NPPF paragraph 61 now states that the outcome of the standard method is an **advisory starting point** for establishing a housing requirement for the area and that there may be exceptional circumstances, including relating to the **particular demographic characteristics** of an area that justify an alternative approach to assessing housing need. The consultation document that gave more details on this proposed change was explicit that student populations was an example that could constitute exceptional circumstances. This was successfully argued in Coventry, with the Office for Statistics Regulation (OSR), which reviews ONS work, subsequently issuing a report recommending the ONS adjust its methodology within student areas. The [ONS responded](#) to this report effectively confirming that the mid-2022-based population projections would be corrected, as would be first-to-use Census data. While we have interim 2021-based projections, we do not yet have the 2022-based projections with the adjusted methodology. At the very least, it needs to acknowledge that this issue exists and that the plan-making timetable may need adjusting accordingly. To simply assert that the extremely high student population of Canterbury is not an exceptional demographic characteristic, without evidence why, is not enough and we will continue to challenge this point.

With the changes to the NPPF, we are now seeing other Councils taking the need to properly evidence whether exceptional circumstances exist. In Kent, this includes neighbouring Swale Borough Council, which has recently gone out to tender for a consultant to specifically consider this point. Nationally, we are now seeing Wolverhampton District Council, South Staffordshire District Council, Epsom and Ewell Borough Council and Bournemouth, Christchurch and Poole Council all advance Local Plans that evidence exceptional circumstances exist to deviate from the standard method. It should also be noted that the current government intention remains to publish a further version of the NPPF this year with a revised standard methodology.

In our view, it would remain a complete dereliction of duty to the residents of Canterbury if CCC chose to persist without even questioning the standard method now that the NPPF confirms that this is an advisory starting point only. Failure to properly evidence this point ahead of the Regulation 19 stage will only lead to further delays and inevitable challenges further down the line.

#### **2. Failure to consider whether the specific constraints of the district mean that the Standard Method housing target can be met in full**

Even if CCC concludes that there are not exceptional circumstances to deviate from the standard methodology as an advisory starting point, they must still assess whether there is sufficient capacity to meet this advisory starting point within the district, based on an assessment of constraints and opportunities.

As previously stated, Canterbury district is significantly constrained. The Kent Downs National Landscape (AONB) covers 27% of the district; ancient woodland covers 15.6% and there are 2 National Nature Reserves and some

15 SSSIs whilst geographically it is constrained to the north by the coast (including attractive areas of undeveloped coast at Seasalter, Swalecliffe, Bishopstone and Reculver). Most significantly, at its core is the historic city of Canterbury with its Unesco World Heritage status and accompanying challenges this has for sustainable development.

Despite such constraints, nowhere in the evidence base can we see any genuine consideration as to whether the district has the capacity to sustainably accommodate the doubling of annual housebuilding rates that meeting the standard method would entail. Similarly, there is no evidence to demonstrate that the district would ever actually deliver such an increase in housebuilding rate, particularly if continuing with a strategy based on large and complicated Canterbury centric allocations (see our comments below regarding a flawed spatial strategy). House builders will only build at a rate the market can absorb, and historically this rate has never been anywhere near that required to meet the standard method target.

What however we are seeing is CCC allowing its spatial strategy to clearly be influenced by the simple availability of unsustainable greenfield sites being promoted for profit. This is most apparent with respect to newly proposed allocation C12 - Land north of the University of Kent. This is a site that has previously been deemed unsuitable within the SLAA assessment though is now suddenly acceptable seemingly to just to meet the clearly unachievable standard method housing target.

It's clear that CCC still need to take ownership of setting a spatial strategy which is truly deliverable and sustainable, having regard to the opportunities and constraints of the district. A local plan must find a balance between providing land for housing and other uses whilst meeting the wider objectives of the NPPF. This means meeting the NPPF's wider social and environmental objectives.

In this regard we would point to the Worthing Local Plan Inspectors Report ([Worthing Local Plan -Final Report \(adur-worthing.gov.uk\)](https://www.adur-worthing.gov.uk) paragraph 78 onwards) where, in agreeing that the specific constraints of the borough meant a housing figure 74% lower than standard method figure was appropriate, the Inspector Steven John Lee BA(Hons) MA MRTPI stated:

*“A local plan must also strive to meet the NPPF’s objectives in relation to the quality of the built environment, the recognition of the intrinsic beauty of the countryside, protection of the natural environment and ensuring the residents of the Borough live in well-designed, beautiful and safe places with accessible services and open spaces. Housing delivery is important, but it is not the be-all and end-all of a Plan’s role”*

Councils are increasingly recognising that, whilst they may still use the standard method target as a starting point in line with NPPF paragraph 61, the constraints within their areas mean that a local plan cannot meet target housing numbers and still be considered sound. Whilst this was the situation in the now adopted Worthing local plan, we are seeing this approach being taken in East Hampshire, Three Rivers, Dacorum and Elmbridge. Again, it is disingenuous for officers to be categorically advising Council members and the public that meeting the standard method target in full is the only option available.

Overall, CCC need to take ownership of setting a spatial strategy which is truly deliverable and sustainable having regard to the opportunities and constraints of the district. It certainly must not allow the direction of its spatial strategy to be unduly influenced at this early stage by the simple availability of unsustainable greenfield sites being promoted for profit. Likewise, it should not allow trying to meet some clearly unachievable arbitrary housing targets panic the Council into pursuing an unsustainable spatial strategy.

With a general election now confirmed for the 4 July, it seems likely that we are heading for a further period of change and uncertainty with respect to planning reforms. Whilst it is telling that a prospective Labour government seems to be focusing upon much needed planning reforms at the strategic level, along with reaffirming *“its commitment to brownfield first planning policies”*, we are yet to see the manifestos of the main parties or any firm details of potential changes including likely timescales for changes.

Despite such uncertainty, it remains crucial that the local plan Canterbury is producing meets the needs of the district, which includes its environmental and social needs. Unfortunately, the current plan does not achieve this and will not do so if it continues to impose an unsustainable and undeliverable number of houses on the district. Instead, given the changing landscape, councillors must take control and ownership of the right strategy for the district, focusing on brownfield regeneration and delivering a sustainable amount of truly affordable housing for residents.

### **3. Flawed Spatial Strategy**

Whilst we welcome the deletion of a standalone settlement at Cooting Farm, Adisham, we remain concerned that CCC is continuing to persist with a spatial strategy prioritising the allocation of large complicated greenfield sites ahead of brownfield sites. In particular, we remain extremely concerned as to the continued and unsustainable over-expansion of Canterbury. This is now exacerbated further with the proposed allocation at Blean.

Such an approach risks repeating the failures of the Canterbury 2017 Local Plan. This similarly sought to rely on significant, large and complicated allocations around Canterbury, though has largely failed to deliver anywhere near the housing numbers that it was supposed to. There is now even less reason as to why more of the same will work this time given there is now a sizable backlog of Canterbury focused development, most notably Mountfield Park in South Canterbury. Firstly, housebuilders will not want to oversaturate a local housing market at the risk of bringing down what they have calculated they can sell a house for. Secondly, the larger the site, the longer the lead-in time before that site begins to deliver homes.

This is of significant concern to CPRE Kent as failure to deliver in line with the proposed strategy would mean failure of the Housing Delivery Test and therefore the continued threat of unplanned and unsustainable windfall development continuing to come forward to fill the void. That is, it is wrong for officers to be assuring Council members and the public that by getting a plan in place they retake control of planning in the district when the proposed strategy is so unlikely to deliver at the speed needed.

### **4. Continued failure to take a genuine brownfield-first approach**

Exacerbating the current flawed spatial strategy, it remains far more needs to be done to demonstrate that brownfield opportunities have been maximised. Again, our CPRE Kent members are being told that there are insufficient sites available, yet still we are not being offered any up-to-date evidence to quantify this.

Rather, it remains that the plan is just relying on those very few sites that happened to be brownfield sites identified as part of the general call for sites exercise and those sites already identified within Canterbury's Brownfield Register. This is simply not enough.

As previously stated, sites in the brownfield register are simply a list of sites already known to the Council, either as a consequence of a planning application or an existing local plan allocation. These add nothing in terms of identifying future additional supply. It is also the case that very few brownfield sites will ever come forward as part of a call for site exercise as these are usually in locations where the principle of development is already acceptable, meaning there is very little point in a landowner going through the unnecessary expense of promoting their site through a local plan process. Instead, the real profits are to be made from the promotion of greenfield sites where the principle of development has not been agreed, hence why these naturally dominate any call for sites exercise.

We therefore continue our call for a far more proactive approach to be undertaken. Whilst this may include a brownfield specific call for sites exercise, this needs to be undertaken alongside Council led assessments such as an urban capacity review. Local communities and the general public should also be encouraged to identify brownfield sites, with the Council working alongside to identify and overcome existing delivery constraints.

With respect to delivery, it remains that some 53 brownfield or mixed brownfield sites put forward and assessed as part of the site selection process have not been taken forward on the basis that they were not deemed deliverable. For those sites in otherwise sustainable locations, we would expect to see evidence the Council has pursued all appropriate opportunities for brownfield regeneration.

Likewise, it is not enough to simply list known brownfield locations and regeneration areas as “opportunity areas” in the manner draft policies C4, C21 and HB2 currently do, without giving any detail as to what constitutes acceptable development upon these sites. This is little more than the Council putting these sites on the too difficult to deal with pile, when in fact they are exactly the sites the Council needs to be dealing with before allocating yet more greenfield land. Unless they are properly master planned at this stage, we won’t know how many residential units they can truly accommodate or if the density is being maximised in a manner which is appropriate to that site's circumstances and setting. Likewise, these sites will never attract any regeneration funding they may need, so the whole time they are just sitting as some vague aspirational site within a plan. Funding partners need both detail and a firm commitment from the Council to bring a site forward. Only a clear local plan allocation accompanied with a Council led masterplan provides this.

It is also our view that much higher densities could be achieved on identified brownfield sites. In particular, the Wincheap Commercial Area (Policy C19) could achieve a much greater density than the proposed 1,000 dwellings, as could the Military Road site (Policy C21). Higher densities on brownfield sites offer multiple benefits. Firstly, it promotes more sustainable living by placing new homes closer to existing amenities, public transport, and workplaces, reducing the reliance on cars and lowering carbon emissions. Secondly, it revitalizes urban areas, turning derelict or underused lands into vibrant communities, thereby boosting local economies and enhancing the quality of life for residents. Furthermore, higher density developments can be designed to provide ample green spaces, community facilities, and energy-efficient buildings, ensuring that urban living remains attractive and sustainable.

In conclusion, CPRE advocates for higher densities on brownfield sites as a key strategy to protect our countryside. This approach not only addresses housing needs but also promotes sustainable urban development, ensuring that our rural landscapes remain intact and enjoyed by future generations.

Overall, unless such proactive steps are undertaken, we are not going to accept the usual argument given to CPRE Kent that there are insufficient brownfield sites available for development, leaving no option but to allocate further greenfield land.

#### **5. Loss of Best and Most Versatile agricultural land must be avoided**

This draft plan appears to be allocating significant development upon Best and Most Versatile land, yet nowhere is this even quantified, let alone any measures setting out what sequential measures have been undertaken so as to minimise its loss. This now includes newly proposed allocation C12 - Land north of the University of Kent

It remains our view that this significant constraint has not been given the due regard necessary within the site selection process. As set out within CPRE’s recent report “Building on our food security” in the past 12 years England has lost over 14,000 hectares of Grade 1 and 2 agricultural land to development, the equivalent to the productive loss of around 250,000 tonnes of vegetables. It also appears that this figure is increasing, with nationally there being a 100-fold increase in 2022 from that built on in 2010. This loss cannot continue to be ignored which is why it remains our view the selection of these site is at odds with NPPF paragraph 174(b). This issue will need to be give significantly more genuine consideration with respect to the allocations which do make it to any submission version of the plan.

#### **6. Genuinely affordable housing must be provided**

At its core, the housing crisis is an affordability crisis. But current definitions of ‘affordable’ are completely out of step with the reality in local areas. As previously pointed out by CPRE Kent, this issue is particularly acute within Canterbury where nowhere near the level of affordable housing needed has been built in recent years. In fact,

the district has only built an average of 69 affordable houses a year over the last 5 years based on the last figures provided, of which on average less than 9 a year have been social rent affordable houses. This is in a district where only 2% of residents can currently afford a house on the open market on their incomes alone<sup>1</sup>. Even more controversially, only 3% of people who currently rent in Canterbury could currently afford to buy an “affordable” house under the shared ownership route to affordable home ownership. This is clearly wrong and shows that the housing that has been delivered and is already being planned for is predominantly to accommodate an external market demand which can afford the inflated prices, rather than for those living in the district struggling to find a home in the area that they have grown up in.

A recent YouGov poll undertaken by CPRE has revealed that people are half as likely to oppose new housing in their local area if the homes were affordable to people on average local incomes. Specifically, whilst 41% of respondents said they did not want to see the construction of more homes close to where they live, that proportion fell to 20% if those homes were locally affordable<sup>2</sup>.

CPRE nationally is therefore calling on the government to redefine ‘affordable housing’ to directly link to average local incomes. Smaller parishes also need protection from Right-to-Buy properties being sold off as second homes so that local people and workers can access them.

We also want to see ambitious targets for new affordable homes required by national planning policy and a new generation of social rented homes. Local communities need support in delivering small-scale affordable developments, and we need a more streamlined process to help local authorities buy land at affordable prices.

Against this context, it is disappointing that the current draft of the local plan is all but silent on the realities of the affordability crisis in Canterbury. A business-as-usual approach of continuing to allocate large, complicated sites which need expensive new roads and other infrastructure provided before a single house can be built, will do nothing to solve this crisis. We would therefore strongly encourage far more bold thinking around a strategy to enable the delivery of genuinely affordable houses for the district.

### **7. Conclusion**

Whilst we will provide detailed comments below on a number of the draft policies as set out within the draft plan, these are caveated and without prejudice to our overall position that:

- CCC needs to properly justify/evidence why exceptional circumstances do not exist, particularly with respect to student numbers.
- Even if the Council still conclude there are no exceptional circumstances, it must still assess whether there is sufficient capacity to meet the advisory starting point of the standard method within the district, based on an assessment of constraints and opportunities.
- With this revised figure, the overall spatial strategy must be revisited in a way that reduces and removes the many extremely damaging and unnecessary proposed greenfield allocations, whilst truly maximising the potential brownfield opportunities.
- This may include more of a focus upon small to medium sites which can come forward quicker/offer better design opportunities by not relying on volume house builders.

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<sup>1</sup> All figures taken from Canterbury City Council Housing Needs Assessment 2021 – [https://drive.google.com/drive/u/0/folders/1BCdWC6ME7X\\_b6szgA1E5knDlsta1ooTY](https://drive.google.com/drive/u/0/folders/1BCdWC6ME7X_b6szgA1E5knDlsta1ooTY)

<sup>2</sup> <https://www.cpre.org.uk/news/opposition-to-development-halves-if-new-homes-are-affordable-poll-finds/>

- Importantly, a revised strategy needs to place far more emphasis on how the local plan can deliver genuinely affordable housing, with the Council or other government bodies taking a far more active role in this.
- In any event, sufficient flexibility should be factored into the local plan process to allow the final version of the plan to respond to the 2021 census-based household projections due to be released April 2025 and/or the anticipated further version of the NPPF with a revised standard methodology. Such flexibility could be achieved by going forward with a lower housing target/plan period though with a commitment for an early review should the wider political situation change.
- In the interim, focus needs to be upon delivering the existing and stalled 2017 local plan allocations to deal with hostile applications coming forward arguing 4/5-year housing land supply argument. This includes a solution for the Stodmarsh issue. Speedily allocating yet more houses on yet more large and complicated sites is not the sustainable solution.

**Our detailed comments are as follows:**

### **Chapter 1: Spatial Strategy for the district**

#### **Vision for the district**

#### **Policy SS1**

- 1) Do you have any comments on this policy?** Please provide any evidence you have to support your comments

We note that no changes have been made with respect to our previously made comments. The following concerns therefore remain.

With respect to paragraph 3, we would expect far more detail, including clear targets to be measured against, setting out how the Stodmarsh Nature Reserve is to sustain full recovery. As currently drafted, this is simply an empty statement.

With respect to paragraph 5, it is unclear how the threshold of 300 homes has been arrived at before 20% tree cover should be provided. We would welcome a lower threshold along with recognition that there may be instances whereby off-site planting is necessary so as to maintain location appropriate densities.

We are concerned by the catch all statement that “Large scale carbon sequestration and renewable power generation will be encouraged in suitable locations across the district”. Whilst CPRE as organisation agrees there is a pressing need for renewable energy, this can never be a justification for poor quality or harmful schemes. That is, the need for energy does not justify damaging developments, and strong, effective planning policies are needed which enable schemes that minimise landscape impacts, secure real nature recovery opportunities and enjoy the support of local communities. Schemes that fail to meet these expectations should be refused. Whilst it is recognised that draft policy DS25 sets some qualifying criteria (upon which we provide further comments below), far more detail is needed as part of this strategic policy, not least what might constitute a suitable location. As a minimum, we would suggest cross reference to DS25 is required.

#### **Policy SS2: Sustainable Design Strategy for the district**

- 2) Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Whilst we welcome and applaud the commitment to **all** new development needing to be designed to achieve Net Zero operational carbon emissions, it is unclear how this would be achieved and monitored in practice i.e. how would you ensure that a new petrol station is operationally achieving net zero carbon emissions?

With respect to paragraphs 4 and 7, we continue to question how the arbitrary threshold of 300 homes has been reached. Will there not be instances under this threshold whereby such new facilities are required to make a proposed development truly sustainable? Likewise, will there not be instances whereby development above this threshold will need to contribute to the vitality of existing community hubs, rather than creating entirely new hubs which will compete with existing?

Whilst we welcome and applaud the commitment to **all** new development needing to be designed to achieve net zero operational carbon emissions, it is unclear how this would be achieved and monitored in practice i.e. how would you ensure that a new petrol station is operationally achieving net zero carbon emissions?

**Policy SS3: Development Strategy for the district**

**3) Do you have any comments on this policy?** Please provide any evidence you have to support your comments

For the reasons set out within our overarching comments, we strongly object to a proposed development strategy which blindly seeks to impose the standard method housing target without first questioning whether such levels of housing can be sustainably delivered within the district having regard to its constraints. We also remain concerned that CCC is continuing to persist with a spatial strategy prioritising the allocation of large, complicated greenfield sites ahead of brownfield sites.

We also note that there has been no substantive update to the employment floorspace assessment beyond a re-adjustment to account for the reduction in local plan period. This is despite our previous call for the employment floorspace figures to be revisited as the plan is seeking to significantly over-allocate employment space. A review of the 2023 Lichfield's Canterbury Economic Development and Tourism Study Focused Update suggests that this remains the case. Specifically, this again shows that labour supply based upon actual population projections amount to an overall employment floorspace need of 60,320 sqm, yet this plan wants to more than double this target to 141,100 sqm based upon inflated "demand" projections. This is on top of some 146,277 sqm of employment space identified within the 2022 Lichfield's study as being currently available. This includes a recognised over-supply of employment land to accommodate growth needs in Canterbury City.

It therefore remains our view that much of the new employment space being allocated, including those significant allocations upon greenfield sites, simply has little to no realistic prospect of delivery. The consequence of going forward on this basis, is the areas being allocated for employment uses upon various greenfield allocations are more likely to be turned into yet more effectively unplanned windfall housing when it comes to the planning application stage. Consequently, it's our view that the level of employment land this plan is seeking to allocate needs to urgently be reviewed. Alongside this, there needs to be a thorough and robust review of existing, permissioned, or allocated employment land. For employment land on brownfield sites or other sustainable locations which is either long term vacant, under-utilised or has not come forward as anticipated needs to urgently be revisited as to whether it could be better utilised for housing or mixed-use schemes. Finally, for those greenfield allocations which have no realistic prospect of delivering employment, as a minimum the site allocation boundaries need to be redrawn, so as to reduce yet further unnecessary land take.

With respect to the rural settlement hierarchy, we have reviewed the 2020 Rural settlement study and 2023 update study underpinning this. Whilst our previous comments with respect to spatial assumptions underpinning the study remain, it is extremely concerning that a number of the district's smaller villages have seemingly been promoted to Local Service Centre status. On closer review, it appears that this has been on the basis that whereas the provision of a bus service was previously recorded, this time it has not. Consequently, a number of small villages



promoted to Local Service Centre status do not even have a conveniently located regular bus service. This includes Adisham, Broad Oak, Hoath, Petham, Rough Common and Wickhambreaux. It is our view that an existing bus service must be a prerequisite for a village to be listed as a Local Service Centre.

**Policy SS4: Movement and Transportation Strategy for the district**

**4) Do you have any comments on this policy?** Please provide any evidence you have to support your comments

CPRE Kent welcomes and supports the aspirations of the revised Transport Strategy and its focus upon achieving a realistic chance of modal shift with a focus upon improving bus provision. As set out within the recent CPRE Report [\*"Every village, every hour"\*](#) Bus services are essential for allowing us to decarbonise the transport sector by providing an alternative to private car travel. This report called upon government to recognise a universal basic right to public transport and back it with statutory duties for local transport authorities to provide legal minimum service frequency standards to villages and towns. We therefore see the proposed strategy, and the enabling policy text of Policy SS4 as being a step in the right direction in achieving this goal.

We are however concerned as to the feasibility of funding the improvements outlined, particularly for the first ten years of the plan period. This concern arises from the absence of near-term measures coordinated with KCC to raise extra revenue or any clear plan regarding this early years funding. Additionally, there is an assumption that the effect of modal shift will sufficiently absorb the traffic generated by new greenfield developments. However, this assumption lacks any modelling of expected traffic flows around Canterbury and Whitstable/Chestfield, which the Council has neither conducted nor published in the consultation documents, according to our sources.

Likewise, we are also concerned to see from the strategy documents that levels of active travel (walking/cycling) appear to have significantly reduced over the last ten years. This is a worrying trend and one which we see being exacerbated by the continued building of car dependant housing developments within the district. As laudable as any sustainable transport policy is, genuine modal shift will only occur if houses are built in genuinely sustainable locations and at densities that allows active travel to thrive.

**Policy SS5: Infrastructure Strategy for the district.**

**5) Do you have any comments on this policy?** Please provide any evidence you have to support your comments

It remains that there is insufficient clarity regarding the infrastructure needed to deliver the development being proposed and in particular detailed costings. A review of the accompanying IDP reveals that there are significant unknown costs including the South West Canterbury Link Road, Active travel measures, improvements at Canterbury Bus Station, improvements to Whitstable railway station, the extension and or improvement at primary school sites within Canterbury, new and/or improved GP surgeries across the district, measures to improve Police capacity, new wastewater treatment works discharging into Stour catchment, the cost of any of the planned open space improvements or the cost of any the planned sports facilities improvements. These unknown costs are on top of the many tens of millions of known costs.

With respect to future drinking water supplies, and for the reasons set out within our response to R17, we are far from convinced that a new reservoir will be delivered at Broad Oak by the target date of 2033. This then raises a water scarcity issue which again we consider adds to the exceptional circumstances and constraints to be considered in terms of appropriate housing numbers for the district.

The plan in its current form is therefore clearly failing to properly account for the necessary infrastructure required to support the envisaged housing developments. The reality is infrastructure projects that are not properly costed or with clear funding sources go to the bottom of the pile when S106 or CIL funding from development is negotiated. Once viability arguments are played out, these projects remain unfunded and undelivered. This means that infrastructure that is known to be needed to support the growth ambitions of the plan does not materialise, eroding the quality of life for current and future residents for years to come

- 6) Do you have any other comments on Chapter 1: Spatial Strategy for the district? If so, please write in below. Please **do not** include personal information in your response below.**

## **Chapter 2: Canterbury**

In line with our overarching comments, whilst we agree Canterbury City offers the most sustainable location within the district, it is entirely unsustainable to seek to effectively double the city's size in order to meet the unjustifiable housing target as set by the standard method. With the city already suffering from the significant overdevelopment of recent years, with many of the previously allocated sites from the 2017 Local Plan either to yet start or deliver as envisaged, to blindly allocate yet more greenfield sites with yet more vague and unconsidered promises around infrastructure is frankly absurd.

It's therefore our view the entirety of the Canterbury City allocations needs to be revisited. With the numbers reassessed as set out above and the brownfield "opportunity sites" properly considered, it is our view that any greenfield take required by this plan will be significantly reduced. For any greenfield take that is required, this will need to properly be master planned in the manner described above.

In addition to the above, we will make the following comments on a number of the specific allocations. However, a lack of comment on a specific allocation should not be interpreted as a form of implicit acceptance.

### **Policy C4: Canterbury City Centre Regeneration Opportunity Areas**

- 1. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

In line with our overarching comments, it is not enough to simply list these known brownfield regeneration areas as "opportunity areas". These need to be properly master planned, with each set out as a clear and detailed local plan allocation to demonstrate the Council's commitment to bringing these sites forward.

### **Policy C6: Land at Merton Park**

- 2. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

It remains that the overall strategy for South West Canterbury (policies C6 -C10) appears to be a series of uncoordinated and developer led new greenfield settlements on the existing urban boundary. Individually, these will be too small to viably or realistically support any significant level of self-containment. Yet collectively, it is extremely difficult to see or understand how these sites will integrate with each other or the existing allocations. The concept masterplan is vague, providing little reassurance or detail as to how the various sites will integrate with both the existing or proposed allocations. Significantly, this includes the stalled South Canterbury allocation

for 4000 houses from the 2017 Local Plan. We are also unsure as to how the Wincheap regeneration, including the new junction and gyratory system, is to integrate with the strategy.

The justification given for the South West Canterbury Allocations is that they would “unlock opportunities to deliver significant infrastructure investment, including a South West Canterbury Link Road”. It is, however, our view that the significant environmental constraints of these sites outweigh any such perceived economic benefit. It is also our view that the benefits of new roads schemes are extremely over-stated and in reality, generate traffic above background trends by inducing traffic, which leads to permanent and significant environmental damage. See our comments in this regard made with respect to proposed policy C11.

Specifically, with respect to Merton Park (C9) it is noted the site is adjacent to Natural England Priority Habitat Inventory (Deciduous woodland), the site is almost wholly within Canterbury AHLV, the entire site is Grade 1 or Grade 2 BMV, is within a Ground Water Protection Zone, half the site is KCC a minerals safe guarding area, is in close proximity to the Canterbury AQMA, contains an area of Archaeological Potential, has an area of contamination within it and is an orange area for Great Crested Newts. It is also within multiple ownership and so will be a complicated site to bring forward. It is therefore unsurprising that the SA has identified significant and minor negative impacts with respect to the site.

#### **Policy C7: Land to the North of Hollow Lane**

- 3. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Comments made above with respect to C6 Merton Park are equally applicable here. In terms of known environmental constraints, Larkey Valley Wood LNR adjoins the north-western tip of the site. The entire site is covered by Canterbury AHLV, the entire site is Grade 1 or Grade 2 BMV, is within a Ground Water Protection Zone, is partially within a minerals safeguarding area and also has an area of contamination

#### **Policy C9: Milton Manor**

- 4. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Comments made above with respect to C6 Merton Park are equally applicable here. We consider this site to be particularly isolated in terms of sustainable transport options.

It is also the case that this site is particularly constrained in that Ancient Woodland covers a section in the south of the site whilst priority Habitat Inventory covers sections on the north and south of the site. The Great Stour local wildlife site is situated to the north-west of the site with it noted protected species could be affected by the development of this site. The site is also within an orange area for Great Crested Newts. Additionally, small portion of site, to north of Manor House is covered by Canterbury AHLV, the site is BMV Grade 3, is within a Ground Water Protection Zone and partially within a minerals safeguarding area

#### **Policy C11 – South West Canterbury Link Road**

**Do you have any comments on this policy?** Please provide any evidence you have to support your comments

The success and deliverability of site C6 to C10 is predicated upon the South West Canterbury link road. It however remains that this is un-costed and is barely mentioned within the draft Infrastructure Delivery Plan. It's our view the link road is simply undeliverable without a level of investment that would render the sites unviable. Amongst other considerations, it is clear from measurements that we have taken on site that the underpass at Hollow Lane would need to be entirely re-engineered so as to accommodate the bypass. Specifically, the total height of carriageway of Hollow Lane to carriageway of A2 is approx. 6.1m. When combined with an incline at the required 1:12 gradient for the link road, the link road would be 72.6m in length at this point.

It also seems likely that significant further highway engineering works would be required to accommodate the bypass, including further roundabouts. It's not however just the cost of the works that concerns us, it's the fact that such extensive highways work will completely destroy the historic lane and countryside in this area.

We are also aware of concerns regarding flooding at the south-western entry point connection to it at Cocking Road, including within the ecological mitigation area adjacent to the Larkey Valley Wood. Again, this is another historic lane of ecological importance.

Likewise, it is the case that the link road is within close proximity to the Canterbury AQMA and clearly will lead to higher vehicle movements within the AQMA. It is therefore far from clear to us why this element has not been included as part of the Sustainability Appraisal assessment in terms of air quality

Generally, in terms of air quality, there currently seems to be no air quality modelling for the new south-western Canterbury plans (C6 and C10). This is of particular concern given likely traffic flows from not just these new allocations, but the in-combination impact from the existing allocations in Thanington. We are also concerned with respect to increased traffic flows, particularly HGVs, making use of the planned new exit off the A2 into Wincheap. Overall, we are extremely concerned that the plan is not taking the issue of air quality seriously enough, particularly within the Wincheap area.

### **Policy C12: Land north of the University of Kent**

You will need to read the policy before answering this question.

**5. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

For the reason set out within our overarching comments, CPRE Kent strongly objects to the proposed Blean allocation. We can see no justification for its inclusion beyond a blunt and last-minute fix undertaken to meet the standard method target. This site was previously assessed as not suitable for a number of sound planning reasons, not just the lack of access. These reasons remain.

Consequently, CPRE Kent has been engaged with and supports the local campaign group "*Save the Blean*" who are highlighting the many flaws of this site as a proposed allocation. We agree that the site is fundamentally flawed due to its significant environmental, agricultural, heritage, flood risk, traffic, biodiversity, and community impact constraints.

1. Ancient Woodlands: The Blean is an area of ancient woodlands, recognised for its significant ecological and historical value. Developing this area would lead to the irreversible loss of these irreplaceable habitats, both directly and indirectly through increase recreational pressures.
2. Agricultural Land: The proposed site encompasses Grade 2 and 3 farmland, classified as Best and Most Versatile. This high-quality agricultural land is currently used for arable crops and grazing, and its loss would negatively impact local food production and agricultural sustainability.
3. Proximity to Conservation Areas and impact on Heritage Assets: The site is immediately

adjacent to multiple conservation areas, heritage buildings, and scheduled monuments, including a Roman Villa and Medieval Tile Kilns. The proposed development threatens their integrity and setting. We are particularly concerned that the development would impact upon the could impact the landscape character and overall setting of this part of the Tyler Hill conservation area. We are also concerned that the ridgeline of the site could impact long distance views of the Canterbury Cathedral World Heritage Site

4. **Green Gap and Settlement Coalescence:** The site is within the green gap and would lead to settlement coalescence, disrupting the distinct identities of local communities and encroaching on open countryside. The site is also within the Canterbury AHLV Open countryside runs from the north, east and south of the site and therefore development would have an impact on the rural landscape. The site is largely within/adjacent to the Amery Court farmland and Stour Valley Sides landscape character area. It is noted that the recommendation within the 2021 review of these areas Landscape Character Areas was to conserve the rural character of the landscape ensuring that it continues to play a role in the separation of Blean and Tyler Hill with Rough Common and the University of Kent to the south. It was also recommended that development should not extend north of this area into the more rural Blean landscape. Consequently, it is noted that this site was previously deemed unsuitable within the 2022 SLAA due to landscape impact concerns. Patently these concerns remain and have not changed.
5. **Poor Drainage and Flooding:** The area already suffers from poor drainage and regular flooding due to extensive clay soil. Covering the area with concrete will exacerbate these issues, making effective flood mitigation virtually impossible. The positive flood risk assessment in the latest SLAA is highly questionable given the documented evidence of London Clay soil and existing flood problems.
6. **Traffic Congestion:** The development will necessitate widening roads and turning Rough Common into a major arterial traffic route into Canterbury. Tyler Hill Road is narrow, and the junction between Tyler Hill Road and Blean Common has a history of incidents. The removal of the Western bypass from the local plan further exacerbates concerns about traffic congestion, as no viable alternative has been proposed to handle the increased load from 2,000 additional households. We are also concerned with respect to the in-combination impact of this allocation and the Brooklands Farm allocation in terms of traffic impact, particularly with respect to the Blean SAC.
7. **Biodiversity Loss:** The site hosts a rich diversity of wildlife, including over 60 species of birds, many of which are on the RSPB Red List, as well as protected species like brown long-eared bats, pipistrelle bats, great crested newts (orange area for Great Crested Newts), and numerous other mammals, reptiles, and amphibians.
8. **Local Amenity Loss:** The proposed development would result in the loss of a significant open space, which serves as a crucial local asset and amenity. The community's quality of life and access to natural spaces cannot be adequately replaced or mitigated within the site.
9. **Impact on Education:** The potential disruption or loss of Blean Primary School, an Outstanding-rated institution by Ofsted, is a major concern for local communities. The uncertainties around the reprovision of this essential service could have long-term negative effects on local education.

In conclusion, CPRE Kent believes that the proposed housing allocation site is fundamentally flawed due to its significant environmental, agricultural, heritage, flood risk, traffic, biodiversity, and community impact concerns.

### **Policy C17: Land at Canterbury Business Park**

6. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

As set out within our detailed objections to the various recent developer led attempts to expand this site:

- The site lies within the Kent Downs National Landscape (AONB);
- The site lies within an Area of High Landscape Value;
- It is the countryside;
- It would have an adverse impact on the Highland Court Conservation Area and Listings;
- It is not in a sustainable location;
- It would worsen air quality;

In our view there are no 'exceptional circumstances' to justify the scheme. Allowing development of this scale would not be consistent with the Council's aim to conserve and safeguard the AONB. The proposed development will, in our view, be contrary to the Kent Downs AONB Management Plans Sustainable Development policies.

The site is almost 8km from the centre of Canterbury. The main pedestrian/cycle route is via the North Downs Way which is used by Cycle Route 16. The North Downs Way is an unlit single lane rural road with no pedestrian footways. It is questionable if people will choose to walk this route during wet weather or during hours of darkness.

There is a limited working population within a 2km radius of the site. The footpaths are not ideal for walking to and from work – they are unlit country paths.

Given the rural location of the site, its good access to A2, limited public transport service, possible nature of proposed employment, including hours of operation, it is likely that people will travel to and from the site by car or motorbike. CPRE Kent is concerned that the development might worsen levels of air quality within the present AQMA Canterbury 3, as well as any future expansion, and be contrary to the National Planning Policy Framework and the local plan.

With the current occupiers of the site Gomez suddenly and unexpectedly ceasing to trade, it is clearly no longer necessary to further expand this site. Rather, focus must now be upon finding a suitable alternative use for the existing buildings.

### **Policy C19: Wincheap commercial area**

#### **7. Do you have any comments on this policy?** Please provide any evidence you have to

As set out within our overarching comments, it is our view that much higher residential densities could and should be achieved within the Wincheap commercial area. Higher densities on brownfield sites offer multiple benefits. Firstly, it promotes more sustainable living by placing new homes closer to existing amenities, public transport, and workplaces, reducing the reliance on cars and lowering carbon emissions. Secondly, it revitalises urban areas, turning derelict or underused lands into vibrant communities, thereby boosting local economies and enhancing the quality of life for residents. Furthermore, higher density developments can be designed to provide ample green spaces, community facilities, and energy-efficient buildings, ensuring that urban living remains attractive and sustainable.

We are however mindful that there are some very specific constraints within Wincheap which any redevelopment of the area would need to consider. This would include several pre-existing and potentially worsening air quality issues within the estate which would require significant mitigation measures to protect future occupiers. Likewise, there are a significant number of heritage assets along the Wincheap road, including

the Grade II listed Maiden's Head Inn at the entrance to the proposed redevelopment site. Such constraints will require careful and detailed master planning to avoid any planning harms, whilst maximising any benefits.

**Policy C21: Canterbury Urban Area Regeneration Opportunity Areas.**

**8. Do you have any comments on this policy? Please provide any evidence you have to**

In line with our overarching comments, it is not enough to simply list a potential brownfield regeneration site as an "opportunity areas" in the manner draft policy C23 does. Unless this site is properly master planned at this stage, we won't know how many residential units it can truly accommodate, if the density is being maximised in a manner which is appropriate to that site's circumstances and setting. Likewise, these sites will never attract any regeneration funding they may need the whole time they are just sitting as some vague aspirational site within a plan. Funding partners need both detail and a firm commitment from the Council to bring a site forward. Only a clear local plan allocation accompanied with a Council led masterplan provides this

We therefore strongly encourage the Council to give this site, along with the other "opportunity areas" proper site allocation polices within the submission version of the plan.

### Chapter 3: Whitstable

#### Policy W4: Land at Brooklands Farm

You will need to read the policy before answering this question.

Please **do not** include personal information in your response below.

1. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

The eastern part of Brooklands Farm maintains a rural character, bordered by countryside lanes. The site is bisected by a stream and Convict Wood Local Wildlife Site, dividing it into western and eastern sections. The site includes a small area of Ancient Woodland, Priority Habitat, and Local Wildlife Site in the central part, which is designated as Ancient Woodland. Several non-protected trees are scattered along field boundaries within the site. CPRE Kent objects to the proposed site allocation under Policy W4 for Land at Brooklands Farm on the following grounds:

1. **Flood Risk:** The site is located within Environment Agency Flood Zones 2 and 3, indicating a high risk of flooding. Development in such areas poses significant challenges for effective flood management and risks to future residents.
2. **Ecological Importance:** The presence of Ancient Woodland and sections covered by Natural England Priority Habitat Inventory underscores the ecological value of the site. Ancient Woodland is irreplaceable and crucial for biodiversity, making its protection paramount. This is an area of high biodiversity value with rare butterflies and breeding birds. As such its ecological, biodiversity and landscape value would be adversely impacted by a development of this scale. Limited consideration is given to these impacts within the evidence base.
3. **Proximity to Local Wildlife Site:** The site is within or adjacent to Convict Wood Local Wildlife Site, which runs through its centre from north to south. Development in or near such sites can have detrimental effects on local wildlife and biodiversity.
4. **High Landscape Value:** The site is almost entirely within the Blean Woods Area of High Landscape Value. This designation recognizes the area's scenic quality, which would be significantly impacted by the proposed development. The Canterbury Landscape Character Appraisal designates the site as being within LCA C2 Chestfield farmland. The 2021 Local Landscape recommendations report highlighted the importance of this area being retained so as to ensure the setting of Blean woods is maintained.
5. **Agricultural Quality:** Parts of the site are assessed as Grade 3 agricultural land, considered Best and Most Versatile. Developing this land would result in the loss of valuable agricultural resources.
6. **Minerals Safeguarding:** A small central section of the site falls under KCC Minerals Safeguarding for Brickearth. This indicates the land's potential value for mineral resources, which should be preserved.
7. **Highway and Infrastructure Concerns:** The surrounding highways, particularly along the southern boundary, are rural with no footways or lighting. The necessary infrastructure improvements would spoil the area's rural character and significantly increase traffic, especially through the Blean Woods, as residents commute to Canterbury.
8. **Heritage Impact:** The Chestfield Conservation Area lies to the east, with three Grade 2 Listed Buildings in close proximity: Brooklands Cottage and Brooklands Farmhouse to the southeast, and Rayham Farm and its barn to the northeast. The proposed development's size and proximity are likely to cause substantial harm to these heritage assets, contrary to the principles of preserving historical integrity.



It is therefore CPRE Kents view that the site's flood risk, ecological significance, landscape value, agricultural importance, mineral safeguarding status, and potential negative impacts on local infrastructure and heritage assets make it an unsuitable location for development.

**Policy W5: Land south of Thanet**

2. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

CPRE Kent wishes to express its concerns regarding the proposed allocation of Site W5 - Land south of Thanet Way, on the following grounds:

1. **Landscape Impact:** Due to the site's rising topography, development would likely be highly visible from viewpoints along the Thanet Way, particularly from the east and west. This visibility would significantly impact the landscape character and visual amenity of the area.
2. **Ecology Impact:** The northwestern corner of the site extends into Duncan Down and Seasalter Local Wildlife Site. Development in this area poses a threat to local biodiversity and the ecological integrity of these important wildlife habitats.
3. **Food Security:** The site comprises Grade 3 Best and Most Versatile agricultural land, with a small section of Grade 4 to the west. Developing this land would result in the loss of valuable agricultural resources, impacting local food security.
4. **Heritage Impact:** The proposed development would affect the setting of the Borstal Hill Mill heritage asset. Preserving the historical context and visual setting of such assets is crucial, and this development poses a significant risk to their integrity.

**Policy W6: Bodkin Farm**

3. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

We remain extremely concerned to see the Council intends to allocate a secondary school and 250 homes upon a site that only as recently as the 2017 Local Plan was identified as a strategic green gap.

It's also noted than planning permission was recently refused and dismissed at appeal on this site, with significant traffic concerns including highway safety concerns at the Chestfield cited among the reasons for refusal. It is difficult to see how these concerns will not be exacerbated with the inclusion of the proposed secondary school.

We are also aware of significant local concern from those who back onto Swalecliffe Brook as to the risk of flooding.

## Chapter 4: Herne Bay

### Policy HB2: Herne Bay Town Centre Regeneration Opportunity Areas

1. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

In line with our overarching comments, it is not enough to simply list a potential brownfield regeneration site as an “opportunity areas” in the manner draft policy HB2 does. Unless each listed site is properly master planned at this stage, we won’t know how many residential units it can truly accommodate, if the density is being maximised in a manner which is appropriate to that site’s circumstances and setting. Likewise, these sites will never attract any regeneration funding they may need the whole time they are just sitting as some vague aspirational site within a plan. Funding partners need both detail and a firm commitment from the Council to bring a site forward. Only a clear local plan allocation accompanied with a Council led masterplan provides this

We therefore strongly encourage the Council to give each site listed, along with the other “opportunity areas” proper site allocation polices within the submission version of the plan.

### Policy HB4: Land to the West of Thornden Wood Road

1. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

In view of the significant greenfield allocations already allocated at Herne Bay under the current Local Plan and our comments above with respect to the Herne Bay urban opportunity sites, it's difficult to see how yet further greenfield development in Herne Bay can be justified.

It is also the case that peak-time congestion at Greenhill Roundabout is already at unacceptable levels. Housing allocations at Greenhill and Strode Farm (from the 2017 adopted plan) are still to be built out and the impact of additional journeys on the Eddington (A2990/A291) and Greenhill roundabouts (A2990) is still increasing. It is clearly evident, from the significant reduction in congestion out of school term times, that ‘school run’ traffic plays a significant contribution to this congestion.

To place another 2FE secondary school in such close proximity to the existing Herne Bay High School would needlessly add to existing congestion. The existing school is accessed off Bullockstone Road and the proposed new one would be accessed from Old Thanet Way or Thornden Wood Road, but all these accesses intersect at the Greenhill Roundabout. We feel that an alternative location further west would better serve the emerging household populations at Altira and Strode Farm.

## **Chapter 5: Rural Areas**

### **Policy R5: Bread and Cheese Field**

- 1. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

CPRE Kent is particularly concerned with respect to the cumulative impact of all proposed developments across the villages of Sturry, Broad Oak, Westbere, Hersden, and Fordwich. Many of the proposed developments appear to be driven by the need to fund the Sturry relief road, a project estimated to cost £41.6 million. There is widespread scepticism about the effectiveness of this road, as it will ultimately feed back into the bottleneck of the A28. This could render the relief road ineffective in alleviating traffic congestion, thereby failing to justify the substantial investment. It is also the case that the Sturry Road water treatment centre is currently at capacity, with no planned expansion until 2030. This raises serious concerns about the ability to manage increased wastewater from the new developments.

Specifically with respect to Policy R5 (the Bread and Cheese Field site), this site is adjacent to Ancient Woodland and Natural England Priority Habitat Inventory. Development here will result in the loss of acid grassland and potential damage to Sarre Penn. The site is partially Grade 2 Best and Most Versatile agricultural land. With respect to landscape impact, development of this land could result in the coalescence of Westbere and Hersden, as the site would connect the Hoplands development to the residential dwellings on Bushy Lane. The site is within an orange area for Great Crested Newts with locals noting the site to be a habitat for species such as slow worms, bats, newts, and nightingales. There is Ancient Woodland adjacent to the site.

### **Policy R7: The Hill, Littlebourne**

- 2. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

We note that planning permission was refused upon this site on the basis of its unsustainable location; the urbanisation of the countryside and loss of agricultural land; and substantial harm to the setting of designated heritage assets. Patently these reasons will remain and therefore this allocation remains unacceptable.

### **Policy R9: Land north of Popes Lane**

- 3. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

We note that planning permission was refused and an appeal was dismissed due to the proposed development's impact on the road network and highway safety. In addition, we are concerned that the site is situated adjacent to the green gap between Sturry and Broad Oak and therefore development of the site would naturally lead to the coalescence of these settlements.

Local residents have also highlighted to us the importance of the site as informal open space given the lack of usable open space in this area. Significant concern has also been raised locally regarding the already strained infrastructure, notably the lack of GPs and wastewater facility.

**Policy R10: Land at The Paddocks, Shalloak**

4. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

CPRE Kent considers this site to be particularly constrained and therefore unlikely to be suitable for development. Specifically, the southeastern corner contains a section of Natural England Priority Habitat: Deciduous Woodland. Ancient Woodland abuts the site to the east. The entire site is covered by Canterbury AHLV. The site is Grade 2 and 3 agricultural land. The site contains a parcel of Priority Habitat and is within an orange area for Great Crested Newts.

**Policy R11: Local Service Centres**

You will need to read the policy before answering this question.

Please **do not** include personal information in your response below.

5. **Do you have any comments on this policy?** Please provide any evidence you have to support your comment

As set out within our response to Policy SS4, it is extremely concerning that a number of the district's smaller villages have seemingly been promoted to Local Service Centre status. On closer review, it appears that this has been on the basis that whereas the provision of a bus service was previously recorded, this time it has not. Consequently, a number of small villages promoted to Local Service Centre status do not even have a conveniently located regular bus service. This includes Adisham, Broad Oak, Hoath, Petham, Rough Common and Wickhambreaux. It is our view that an existing bus service must be a pre-requisite for a village to be listed as a Local Service Centre.

**Policy R17: Broad Oak Reservoir and Country Park**

You will need to read the policy before answering this question.

Please **do not** include personal information in your response below.

6. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

We have significant concerns over the principle of siting a reservoir at this location. The preamble to R26 acknowledges that there is opportunity to deliver recreational benefits on top of the proposed functional water infrastructure provision, but we remain to be convinced of the case for any reservoir at all at Broad Oak – in which case the policy intention of delivering a recreational facility at the site becomes redundant. We responded to the recent consultations on Water Resources South East's regional plan and the individual water company Water Resource Management Plans (including of course South East Water, promoter of the Broad Oak Reservoir) and our concerns will be clear to those organisations.

That said, should the reservoir be demonstrated to be necessary, and being functionally capable of delivering the water infrastructure output expected of it, we welcome the policy's commitment to improving the green infrastructure. While the policy refers to a long-overdue safe cycle route between Herne Bay and Canterbury, it carefully avoids making any clear commitment to its provision: Policy R26 must actively commit to the delivery of such a route should the reservoir go ahead.

## Draft Canterbury District Local Plan to 2040 (Regulation 18) Consultation 2024 - Response from CPRE Kent

Environmental concerns: the site safeguarded for the reservoir has developed into a particularly diverse local habitat. While we recognise and applaud the intended commitment to improving green infrastructure, delivering a genuine net gain in biodiversity will be an extraordinarily challenging task.

Infrastructure planning concerns: the reservoir is proposed in both the WRSE and South East Water plans, currently under consultation, to help meet the requirements for the projected household growth of the south easternmost area of the region. We will maintain, in our consultation responses to both organisations, that the projection of the numbers of households whose needs they are intending to meet are over-stated. Current targets for household growth are known to be flawed, as our representations explain elsewhere and, aggregated across the wider south east region, the regional and individual water company projections of need are vastly in excess of the homes likely to be delivered.

Hydrological concerns: we understand that the reservoir, situated in the Sarre Penn valley, will need to be supplemented by water pumped from the Stour. It is common local knowledge that the Sarre Penn stream frequently dries to a series of disconnected pools in summer, and that the winter flow of the Stour (to which the Sarre Penn is a tributary) is in long term decline, limiting the options for filling any reservoir at this spot. CCC could find itself left with the worst of all options: high housing targets based on the assurance of water supply from a reservoir that may never fully function, lacking the available water to fill it and failing to deliver the recreational and biodiversity gains that were promised

## Chapter 6: District-wide Strategic Policies

### Policy DS1: Affordable housing

1. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

As set out within our overarching comments, the housing crisis is an affordability crisis. But current definitions of 'affordable' are completely out of step with the reality in local areas. As previously pointed out by CPRE Kent, this issue is particularly acute within Canterbury where nowhere near the level of affordable housing needed has been built in recent years. In fact, the district has only built an average of 69 affordable houses a year over the last 5 years based on the last figures provided, of which on average less than 9 a year have been social rent affordable houses. This is in a district where only 2% of residents can currently afford a house on the open market on their incomes alone<sup>3</sup>. Even more controversially, only 3% of people who currently rent in Canterbury could currently afford to buy an "affordable" house under the shared ownership route to affordable home ownership. This is clearly wrong and shows that the housing that has been delivered and is already being planned for is predominantly to accommodate an external market demand which can afford the inflated prices, rather than for those living in the district struggling to find a home in the area that they have grown up in.

A recent YouGov poll undertaken by CPRE has revealed that people are half as likely to oppose new housing in their local area if the homes were affordable to people on average local incomes. Specifically, whilst 41% of respondents said they did not want to see the construction of more homes close to where they live, that proportion fell to 20% if those homes were locally affordable<sup>4</sup>.

CPRE nationally is therefore calling on the government to redefine 'affordable housing' to directly link to average local incomes. Smaller parishes also need protection from Right-to-Buy properties being sold off as second homes so that local people and workers can access them.

We also want to see ambitious targets for new affordable homes required by national planning policy and a new generation of social rented homes. Local communities need support in delivering small-scale affordable developments, and we need a more streamlined process to help local authorities buy land at affordable prices.

Against this context, it is disappointing that the current draft of the local plan is all but silent on the realities of the affordability crisis in Canterbury. A business-as-usual approach of continuing to allocate large, complicated sites which need expensive new roads and other infrastructure provided before a single house can be built will do nothing to solve this crisis. We would therefore strongly encourage far more bold thinking around a strategy to enable the delivery of genuinely affordable houses for the district.

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<sup>3</sup> All figures taken from Canterbury City Council Housing Needs Assessment 2021 – [https://drive.google.com/drive/u/0/folders/1BCdWC6ME7X\\_b6szgA1E5knDlsta1ooTY](https://drive.google.com/drive/u/0/folders/1BCdWC6ME7X_b6szgA1E5knDlsta1ooTY)

<sup>4</sup> <https://www.cpre.org.uk/news/opposition-to-development-halves-if-new-homes-are-affordable-poll-finds/>

## Policy DS2: Housing mix

2. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

This policy seems sensible, but we will need to allow for flexibility in some cases.

Query whether policy on housing mix will apply to windfall, as well as allocated sites – bullet point 1 should be amended to reflect this point: “Development proposals which include new housing (whether on allocated or windfall sites) will provide ...”

Note that for schemes for 10 (and up to 10 dwellings) will not need to make provision for sustainable mixed communities – is this the intention?

## Policy DS3: Estate regeneration

3. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

This policy is welcomed, especially the fact that the Council has committed to working with its partners and local communities. Query how future regeneration will be funded.

## Policy DS4: Rural housing

4. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

This policy should be amended to address the circumstances in which conversion of rural buildings to dwellings will be permitted – with reference to policy DM1.

The Council will need to be careful that infill developments within the village confines; or those located directly adjacent to the settlement boundary do not alter the character of the settlement, and that the amount of housing is commensurate with the village/settlement.

It is noted that proposals for rural exceptions sites will need to be for 11+ dwellings to ensure that affordable housing provision is made.

Placemaking and local distinctiveness will be key

## Policy DS5: Specialist housing provision

You will need to read the policy before answering this question.

Please **do not** include personal information in your response below.

5. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Part 3 (student accommodation) should be amended to require such provision to have a full-time manager, appropriate indoor and outdoor leisure facilities and long terms provision for site cleaning, litter clearance and parking management.

Strong objection to Part 5. Concerned that temporary use of use of student accommodation for tourist accommodation will severely affect the viability of local hotels and bed and breakfast businesses. This will conflict with the plan to encourage hotel growth in the city.

Welcome 1(b) which confirms that provision of specialist older person accommodation will be within a settlement boundary and with easy access to public transport. However, it is not clear whether this policy relates to provision of specialist housing for the elderly on large/strategic sites; and whether such provision would meet the needs of older person accommodation in the district's villages?

Retirement villages would be best located in urban areas with a range of services and facilities suitable for older people. In any event the older generation should be able to downsize and live within mixed communities so they can continue to build and rely on social connections, and not be socially isolated.



You will need to read the policy before answering this question.

Please **do not** include personal information in your response below.

6. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Welcome commitment to efficient use of land at point 6, but we are concerned that the densities being suggested are too low and will result in additional greenfield land take to meet housing need.

High density building does not equate to high rise apartment blocks. CPRE London published a report in 2019 on this issue called "Double the density, halve the land needed" which sets out both the benefits of higher density design along with providing examples of higher density developments being achieved by a variety of means. This includes a mixed-use residential development at Springhead Park, Ebbsfleet where 160dph is being achieved.

[https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded\\_1.pdf](https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded_1.pdf)

The National Design Code (2021) states that density is an essential component of an effective design code. Building at 20-40dph is noted as representing development in outer suburbs; suburban development is pegged at 40-60dph and urban neighbourhoods at 60-120dph.

Further research undertaken by CPRE and Place Alliance (A housing design audit for England, 2020) [https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England\\_2020.pdf](https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England_2020.pdf) concludes that housing schemes performed more poorly with distance from the urban core and with reduced density. The additional constraints imposed by stronger pre-existing urban context, were considered to encourage a more sensitive design response. Building at low density and on green fields is not being done well in terms of design quality. The most successful schemes (as audited in the study of 142 developments) were those at 56dph – which is almost double the national average of 31dph.

Regard will need to be had to dark skies. NPPF 185(c) requires planning policies to limit the impact of light pollution on intrinsically dark landscapes and nature conservation, and to limit the impact of light pollution from artificial light on local amenity.

<https://www.nightblight.cpre.org.uk/> It would be useful to add reference to policy DM18.

A policy is needed to require new build to meet energy efficiency standards higher than current government requirement to ensure that solar panels are provided in new developments (residential and commercial) or that solar panels have to be part of new build energy efficiency requirements.

The policy should allow for new and emerging technologies.

There needs to be clarity as to who is responsible for the long-term maintenance of cycle paths, green buffers, pocket parks, verges, trees and so on. Will there be a management charge levied on householders (and what controls will there be to ensure there won't be exorbitant rises)? Will the Council/KCC be responsible?

On-site energy production and district heating via solar panels or ground source heat pumps or wind should be encouraged.

**Policy DS7: Infrastructure delivery**

You will need to read the policy before answering this question.

Please **do not** include personal information in your response below.

7. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Part 3 should be amended to ensure that topography (hills and slopes) is factored into both the practicality of accessing community infrastructure and how both routes and journey times will need to be adapted to reflect the extra effort/time needed to travel by foot/cycle.

Appropriately located social and community infrastructure is more important than transport infrastructure. The policy objective should be to create genuinely sustainable communities.

In terms of infrastructure, the Council needs to clearly set out what is needed, how much it will cost, how it'll be funded, when it will be delivered and by who. New development must take care of needs that arise as a result of proposed development.

Policy DS8: Business and Employment Areas

8. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Employment floorspace figures should be revisited as it is our view the plan is seeking to significantly over-allocate employment space for the reasons set out in our response to SS3.

It is therefore our view much of the new employment space being allocated, including those significant allocations upon greenfield sites, simply have little to no realistic prospect of delivery. The consequence of going forward on this basis is that the areas being allocated for employment uses upon the various greenfield allocations are more likely to be turned into yet more effectively unplanned windfall housing when it comes to the planning application stage. This will have a significant combined impact of firstly undermining any claim around levels of employment use self-containment within these large mixed-use allocations and then secondly a far higher than anticipated impact upon local infrastructure which must now accommodate higher than anticipated housing numbers and employment outward commuting levels.

Consequently, it's our view that the level of employment land this plan is seeking to allocate needs to urgently be reviewed. Alongside this, there needs to be a thorough and robust review of existing, permissioned, or allocated employment land. For employment land on brownfield sites or other sustainable locations which is either long term vacant, under-utilised or has not come forward as anticipated needs to urgently be revisited as to whether it could be better utilised for housing or mixed-use schemes.

In particular, we are extremely concerned to see Highland Court being allocated, for the reasons set out in our response to policy C17.

Policy DS9 - Education and associated development

You will need to read the policy before answering this question. Please **do**

**not** include personal information in your response below.

9. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

No comments

**Policy DS10: Town centres and community**

10. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Every opportunity should be taken to re-populate inner urban areas, with generally car free, dense development.

Encouragement should be living to “living above the shop” as a means of providing a sustainable solution to addressing housing need, thereby reducing the demand for greenfield land development.

It will be important to have a distribution of suitable sized centres that reduce the need to travel and support sustainable development. Query whether the existing hierarchy provides a suitable distribution enabling convenient access to services and facilities?

Reference is made at paragraph 6.28 of the rise of online shopping, but it’s not clear whether the Council has any evidence that these centres, including rural service centres have been adversely affected by online sales and deliveries? If they have, what role can these centres reasonably provide for their immediate communities?

It is noted that the Retail and Leisure Study 2020 refers at table 36 refers to South Canterbury, Sturry/Broad Oak, and Cockerling Farm as Strategic Allocations with a retail element. These are not referred to in the draft local plan. We would therefore ask whether there is a reason for this or whether it is the case the hierarchy needs updating.

We welcome the changes made with respect to Thanington being variously described in the Rural Settlement Study (2020) as a village and a Rural Service Centre, with confirmation that it is a Local Service Centre, and referred as such in the table within this policy.

**Policy DS11: Tourism development**

11. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Accommodation, whether located at the edge of town or in rural areas should be sustainably located - as if it were conventional residential development. New tourist accommodation should support existing rural communities and not be isolated developments.

Concerned that tourist accommodation in the rural area could result in increased vehicular traffic on local roads.

Welcome the provisions made at part 2 of the policy as a means of ensuring an appropriate balance between tourist accommodation and protecting residential amenity.

Concerned that temporary use of use of student accommodation for tourist accommodation will severely affect the viability of local hotels and bed and breakfast businesses. This will conflict with the plan to encourage hotel growth in the city – see comments made at DS5.

**Policy DS12: Rural economy**

12. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments  
See comments at Policy DS4.

This policy should be amended to address the circumstances in which conversion of rural buildings to dwellings will be permitted – cross reference to policy DM1.

Paragraph 180(b) of the NPPF requires planning decisions to contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land. With paragraph 181, footnote 62 stating that “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”

The Council will need to ensure that it has sought to identify areas of poorer quality agricultural land for development.

Agricultural land has a vital role to play in absorbing carbon and preserving biodiversity, including the biodiversity in soils. Once it is built over the soil biodiversity is lost. Therefore, to minimise land take, it is essential that density of developments on greenfield sites is as high as reasonably possible

**Policy DS13: Movement Hierarchy**

13. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Walking and cycling is not available to everyone. Young families, the elderly and the less able will not be able to walk or cycle. Distance, hills and the weather will mean the car will remain the preferred option on many occasions. This hierarchy must be sufficiently flexible to allow for this.

The Department for Transport has published a technical guidance (April 2017) on cycling and walking infrastructure plans ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/908535/cycling-walking-infrastructure-technical-guidance-document.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908535/cycling-walking-infrastructure-technical-guidance-document.pdf)).

Paragraph 2.1 states: “Local Cycling and Walking Infrastructure Plans (LCWIPs), as set out in the Government’s Cycling and Walking Investment Strategy, are a new, strategic approach to identifying cycling and walking improvements required at the local level. They enable a long-term approach to developing local cycling and walking networks, ideally over a 10-year period, and form a vital part of the Government’s strategy to increase the number of trips made on foot or by cycle.”

It is not clear whether the Local Cycling and Walking Implementation Plan is intended to be an LCWIP for the purposes of the Department for Transport technical guidance.

## Policy DS14: Active and sustainable

14. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Alternative ways need to be drawn up to encourage active travel and public transport as a real, workable solution to single occupancy car travel – connecting towns and villages with each other and Canterbury, as well as being affordable, clean, safe and getting you there (and back) on time. Public transport, especially at mode changes needs to be responsive of the needs of ‘slow’ travellers – whether that be because they’re travelling with small children/prams, have a disability or are aged. If connections cannot be comfortably planned this will be a barrier to public transport take up.

Initiatives such as P&R, Arriva click (on demand bus services) and facilitating active travel and public transport routes into and around the city centre should be explored.

Without suitable convenient active travel links to employment areas, and public transport with service patterns that support employment areas, workers are more than likely to travel to work by car.

If people are to be encouraged/enabled to walk and cycle to work, school, shop and leisure then a comprehensive network across the whole district will be required. This will mean not only provision within new developments but also providing ‘missing links’.

## Policy DS15: Highways and parking

15. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Part 2 should be amended. More than a minimum of one in 10 spaces (at parking areas at new developments) should have an EV charge hook up, in order not to be a barrier to EV car take up. All EV charge points should be rapid chargers (as opposed to 7kW trickle chargers – which will take 8 hours to charge a car), to ensure that a full charge is capable, within a reasonable period of time.

Part 5 should be amended to ensure that construction traffic is properly managed.

Reduced parking provision needs to go hand in hand with reliable active travel and public transport provision. Without it, additional pressure will be placed on nearby streets.

Consideration should be given to facilitating car clubs, so that shared cars can be used for local/infrequent travel.

**Policy DS20: Flood risk and sustainability**

16. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

The Stour is one of only 210 chalk streams in the world and a globally important ecosystem. And yet increasing urbanisation, abstraction and pollution (both from agricultural sources and from sewage surges) are causing serious damage.

The Council needs to develop a long-term vision for the Stour which recognises its ecological significance and also its huge recreational value.

This vision could be in the form of the Stour Valley Regional Park as recommended by the Kentish Stour Countryside Partnership. Given the likelihood of more extreme and unpredictable weather events, the capacity of the Stour's floodplain to slow the flow of floodwater should be enhanced.

Policy DS21 - Supporting biodiversity recovery

You will need to read the policy before answering this question. Please **do**

**not** include personal information in your response below.

17. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

**Policy DS22: Landscape Character**

18. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

The valued landscape of the District needs to be at the heart of the Council's vision for the future. The countryside needs to be protected from poor, garish building materials at the new urban edges and consideration given to the visual impact of development on the skyline/hillsides.

We are however concerned and confused with respect to the approach and methodology which has been undertaken with respect to updating and reviewing the Landscape Character Areas. For example, we note that within the LUC studies that the F7 land around Chartham has not been designated despite scoring higher in the assessments than those areas which are accepted as Local Landscape Designations. Far better explanations need to be given as to the rationale behind this, which we will review and scrutinise as the plan progresses.

The Council will also need to have regard to dark skies. NPPF 191(c) requires planning policies to limit the impact of light pollution on intrinsically dark landscapes and nature conservation, and to limit the impact of light pollution from artificial light on local amenity. It would be useful to add reference to policy DM18.

**Policy DS23 - The Blean Woodland Complex**

You will need to read the policy before answering this question. Please **do**

**not** include personal information in your response below.

19. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

As set out within our comments to C12, we are extremely concerned as to the impact of that allocation upon the Blean Complex. It's our view that the requirements of this policy, and in particular paragraph 5, are entirely incompatible with the C12 - Land north of University of Kent allocation.



Policy DS25 - Renewable energy and carbon sequestration

You will need to read the policy before answering this question. Please **do**

**not** include personal information in your response below.

**20. Do you have any comments on this policy?** Please provide any evidence you have to support your comments

We have some concerns about the current wording of policies related to renewable energy projects in the local plan and that it could inadvertently lead to developers building large industrial facilities on the best agricultural land. We strongly object to this, as it may result in large-scale industrialisation of the countryside, harming rural landscapes, wildlife, and residents. Whilst we recognise that Policy DS25 states that renewable energy projects will be supported if they align with other policies in the plan, we are concerned that the emphasis on energy production may overly favour developers of large-scale facilities.

We would however welcome far greater emphasis placed on rooftop solar installations on commercial and residential developments, rather than using prime agricultural land. For example, Site 8 Land North of Hersden, with 1 hectare of business space, should utilize rooftop solar panels.

## Chapter 7: Development Management Policies

### Policy DM2: Residential garden land

You will need to read the policy before answering this question.

Please **do not** include personal information in your response below.

1. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Policy DM2 should be amended.

CPRE Kent welcomes gentle densification within existing settlements (as defined in the settlement hierarchy) as a means of increasing yields within urban areas and reducing pressure on greenfield land development. It is considered, however, that the wording of paragraph (a) within the policy should be more closely aligned with the guidance set out at paragraph 130 of the NPPF in respect of the wording “wholly out of character”.

This policy (or its preamble) should cross-reference to Policy DS6, with regard to density expectations.

### Policy DM11: Residential

2. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

#### Policy DM11 should be amended

In the interests of addressing climate change, CPRE Kent considers that this policy should make specific reference to the orientation of new buildings (in the interests of making best use of the benefits of solar gain) and that rooftop renewables (solar panels) should be a policy requirement.

This policy (or its preamble) should cross-reference to Policy DS6 (orientation/solar gain) and DS25 (rooftop renewables).

### Policy DM12: Non-residential design

3. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

Policy DM12 should be amended

In the interests of addressing climate change, CPRE Kent considers that this policy should make specific reference to the orientation of new buildings (in the interests of making best use of the benefits of solar gain) and that rooftop renewables (solar panels) should be a policy requirement.

**Draft Canterbury District Local Plan to 2040 (Regulation 18) Consultation 2024 - Response from CPRE Kent**

This policy (or its preamble) should cross-reference to Policy DS6 (orientation/solar gain) and DS25 (rooftop renewables)

**Draft Canterbury District Local Plan to 2040 (Regulation 18) Consultation 2024 - Response from CPRE Kent**

- 4. Do you have any other comments on Chapter 7: Development Management Policies?** If so, please write in below. Please do not include personal information in your response below.

Two column text layout in policies is very difficult to navigate – particularly when text spans more than one page

## Appendix 1: Glossary

You will need to view the appendix before answering this question.

Please **do not** include personal information in your response below.

1. **Do you have any comments on Appendix 1?** Please provide any evidence you have to support your comments

With respect to the definition of Garden City Principles, CPRE Kent is concerned that this term is being hijacked for developments that are anything but garden cities or villages. The idea of garden villages was first proposed by Ebenezer Howard in the late 19th century. His vision was for communities comprising of 30,000 people on a site of around 400 hectares, allowing for a good range of public services to be supported and also ensure that no home needed to be further than 500m from the town centre. Ultimately, garden cities would be sustainable, walkable communities that used land well.

However, the current crop of garden settlements proposed by the government seem only to have the name in common. All too often, they're low density and far from town centres and rail stations. They also lack public services provision, their streets are designed for car use, and funding for public transport, walking and cycling are missing.

Garden villages, developed more in tune with Ebenezer Howard's vision, may offer part of the solution to the housing crisis. But such settlements don't need to be new towns – and they certainly do not need to be built on greenfield land.

## Sustainability Appraisal and Impact Assessments

### Habitats Regulations Assessment

You will need to read the Habitats Regulations Assessment before answering this question.

1. **Do you have any comments on the Habitats Regulations Assessment of the draft Local Plan?** To help us process your comments effectively please reference which section of the Habitats Regulations Assessment you are commenting about. Please provide any evidence you have to support your comments. Please **do not** include personal information in your response below.

### Sustainability Appraisal of the draft Local Plan

You will need to read the Sustainability Appraisal of the draft Local Plan before answering this question.

2. **Do you have any comments on the Sustainability Appraisal of the draft Local Plan?** To help us process your comments effectively please reference which section of the Sustainability Appraisal of the draft Local Plan you are commenting about. Please provide any evidence you have to support your comments. Please **do not** include personal information in your response below.

CPRE Kent has had sight of independent review of the Sustainability Appraisal undertaken by Greenfriars and led by Dr R Howard. Whilst we recognise and agree with this report's findings with regard to Policy C12 - Land north of the University of Kent. More troubling is its conclusion that the SA carried out lacks a proper consideration of alternatives and that the information relied upon is not justified, reasonable, sound or appropriate based on the evidence presented. Further, it is the report's author's view that there is "*compelling evidence that the SA produced is deficient with regard to the legal requirement to assess the environmental effects of the plan under the Strategic Environmental Assessment (SEA) regulations and that the inadequate consideration of these requirements will put the local plan at risk of further legal challenges in addition to failing to properly inform the public, stakeholders and Council members on the effects of the proposals on the environment*".

CPRE Kent's own reading of the both the plan and SA would support such a finding at this stage. It certainly does seem the case, particularly with respect to Policy C12 – Land north of the University, that the SA process is being retrofitted around the availability of deliverable sites, rather than as a truly iterative process. We will therefore continue to monitor this aspect of the plan making process.

## Corporate consultations

We have several corporate consultations coming up soon and we would like to hear from you.

Which of the following corporate consultations would you like to be informed about? \* Please tick those that apply

Levelling Up Fund projects

None

Climate Change Action Plan

Other, please state:

Annual budget proposals

\_\_\_\_\_

If you'd like to be informed, and are happy for the council to contact you about corporate consultations, please tick the box to indicate your consent to us contacting you:

I consent to being contacted by the council

How would you like to be contacted? \*

By email

By post

Please provide your email address: \*

[REDACTED]

Please provide your

details:

[REDACTED]

[REDACTED]

**How did you find out about this consultation? \*** Please tick those that apply

- |   |   |
|---|---|
| <input type="checkbox"/> Email from the council | <input type="checkbox"/> Council website      |
| <input type="checkbox"/> Council Facebook post  | <input type="checkbox"/> Word of mouth        |
| <input type="checkbox"/> Council Twitter post   | <input type="checkbox"/> Other, please state: |
| <input type="checkbox"/> Council LinkedIn post  |   |

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### Processing your information

Canterbury City Council is the data controller.

Your personal information is processed under UK General Data Protection Regulation Article 6.1 (c) and Article 9.2 (g) in the performance of an official duty and to meet our Public Sector Equality Duty. In submitting a representation, your personal data will be stored for up to one year from the date the Local Plan is adopted.

All information you give us will be stored securely by Canterbury City Council.

We are required to publish the responses we receive, including your name and the name of the organisation, body or person you are representing. Please do not include information in your comments unless you are happy for it to be published. We may also share your data with the Planning Inspectorate.

We'll let you know when the Local Plan reaches the next stage in the process, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012.



## Equalities

The council has a legal duty to consider the needs of its diverse range of customers. As well as questions about our services we ask you questions relating to our equalities duties. Although you do not have to answer these questions, without this information the council will be limited in understanding whether views differ among different groups of people.

## Your Rights

You have the rights to:

- Access your personal data
- Rectify or correct your personal data
- Restrict the processing of your data
- Complain to the Information Commissioner's Office

You also have the right to object to our processing of your personal data.

The appointed Data Protection Officer is Canterbury City Council's Head of Corporate Governance, who can be contacted by email at [dataprotection@canterbury.gov.uk](mailto:dataprotection@canterbury.gov.uk), by phone on **01227 910 662** or at the address below.

Canterbury City Council, Council Offices, Military Road, Canterbury, Kent, CT1 1YW.  
Phone: **01227 862 000**. Web: [www.canterbury.gov.uk](http://www.canterbury.gov.uk)

## Contact information

Your first name: \*

Your surname: \*

Your email address: \*

House name/number: \*

Street: \*

City, town or village: \*

Your postcode: \*

**What age are you?** Please tick one box only

- |                                   |  |
|-----------------------------------|--|
| <input type="checkbox"/> Under 18 | <input type="checkbox"/> 55 to 64          |
| <input type="checkbox"/> 18 to 25 | <input type="checkbox"/> 65 to 74          |
| <input type="checkbox"/> 26 to 34 | <input type="checkbox"/> 75 to 84          |
| <input type="checkbox"/> 35 to 44 | <input type="checkbox"/> 85 and above      |
| <input type="checkbox"/> 45 to 54 | <input type="checkbox"/> Prefer not to say |

**What gender are you?** Please tick one box only

- Male  Female
- Prefer to self-describe (for example, non-binary, gender fluid etc), please provide further details if you wish:

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Prefer not to say

**Do you consider yourself to be disabled?** Please tick one box only

- Yes
- No
- Prefer not to say

Thank you for taking the time to respond to this consultation.