



# Appendix 3.1: Consultation responses: Canterbury Draft Local Plan to 2045 (Regulation 18)

# 1. Introduction

Consultation on the Draft Canterbury District Local Plan to 2045 (Regulation 18) took place between Monday 24 October 2022 and Monday 16 January 2023.

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

The Draft Canterbury District Local Plan to 2045 (Regulation 18) was informed by previous consultations undertaken as part of the process of preparing a new Local Plan for the district.

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

# 2. Executive summary

A total of **2,057** responses were received from individuals and organisations, comprising **24,099** individual representations on specific policies across the whole Local Plan.

The full comments submitted by each respondent in response to the consultation are set out at **Appendix 3.5.** 

Some **1,337** questionnaire responses were received through the online survey and **720** responses were received in writing, such as via email or letter.

Respondents were asked to what extent they agreed with the draft plan's policies. This received a mixed response depending on the nature of the policy. Respondents showed a higher level of agreement with policies relating to environmental protections and proposals. However, policies related to development and transport proposals tended to receive higher levels of disagreement.

**Appendix 3.2** sets out the quantitative analysis of the extent to which respondents said they agreed or disagreed with each of the policies within the draft plan.

Respondents were asked what changes they thought should be made to individual policies and were invited to share any other comments they may have had. By Chapter, some of the key points raised were:

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

- Housing figure deemed too high
- Significant concerns were raised around lack of infrastructure
- Wide-ranging objections to the Canterbury Circulation Plan
- Concerns for environment and the loss of green space
- Mixed responses on climate change policies

## **Chapter 2: Canterbury**

- Eastern Movement Corridor (EMC): concerns around impact on Old Park and fragmentation of habitats
- Canterbury Circulation Plan: overwhelming objection to zoning proposals and restricting movement with respondents considering them counterproductive
- South West Canterbury: Merton Park and Hollow Lane
  - Traffic implications
  - Infrastructure concerns
  - Some support for sports facilities and new Park and Ride
- East Canterbury: Hoath Farm and Bekesbourne Lane
  - EMC was at the heart of objections

## **Chapter 3: Whitstable**

- Brooklands Farm
  - Loss of agricultural land

- Concerns around sewerage and flooding
- Infrastructure in need of improvement
- Bodkin Farm
  - Concerns around traffic impact
  - Loss of green gap

#### Chapter 4: Herne Bay

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

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

- Cooting Farm, Adisham: overwhelming opposition for proposed new settlement, impact on rural character and inadequate local infrastructure
- Rural service centres and local service centres: classification of settlement status disputed, residents concerned about increased development (in line with settlement hierarchy and local facilities)
- Littlebourne and Chartham: largest allocations within RSCs, concern for character of settlements and capacity of local infrastructure (e.g. schools, GPs)

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

- Affordable housing: challenging definition of 'affordable housing', affordability for local people and need for social housing highlighted
- Sustainable design: solar panels and electric vehicle charging should be mandatory, some challenges to the council's net zero ambitions
- Education: objection to development on southern slope of University of Kent campus, opposition to new student accommodation in city centre
- Movement hierarchy: strong support for low carbon journeys but improved public transport needed. High quality walking and cycling routes urgently needed and consideration for older people and their travel needs
- Habitats and landscapes: protection of Old Park, improve habitats and connectivity, protect valuable green space
- Biodiversity: push to protect Blean Woods and Old Park and improve habitat connectivity. Some opposition to 20% biodiversity net gain and suggestions that the target should be aligned with government requirements

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

- Light pollution and dark skies: support for the designation of 'dark sky zones'
- Noise pollution and tranquillity: support for the identification of 'tranquil zones'
- Sustainable drainage: support for standards for sustainable drainage in new developments and a desire to see this during the early stages of development

**Appendix 3.3** sets out an analysis of the issues raised by respondents based on the written comments received for each policy.

# 3. Consultation methodology

The following methods were used to seek views:

- an online questionnaire (see **Appendix 3.6**)
- a paper version of the questionnaire
- public drop-in events in the following locations:
  - Canterbury,
  - Whitstable
  - Herne Bay
- a meeting with all parish councils in the district
- dedicated briefings with parish councils, as below:
  - Hoath Parish Council
  - Adisham Parish Council
  - Wickhambreaux Parish Council
  - Bridge Parish Council
  - Fordwich Parish Council
  - Womenswold Parish Council
  - Littlebourne Parish Council
- dedicated briefings with amenity groups, business community and groups, as below:
  - Canterbury Society
  - Business Improvement District (BID)
  - ACRA
  - Whitstable Society
  - Spokes
  - C4B
  - Disability Advisory Panel
  - CAST
  - St Michael's Road Area Residents' Association
- written representations were also welcome, where 720 responses were received

The consultation was promoted in the following ways:

- an article on the council's newsroom site
- posts on the council's social media channels
- press releases sent to the local media
- correspondence to those that signed up to the Local Plan contact database, as well as statutory stakeholders

### 1. Respondent profile

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

The vast majority of responses were received from individual residents, with 80 responses received by businesses, organisations or community groups. Some respondents listed under 'Other' could be applied to the other profiles.

A resident of the city of Canterbury	83.8% (1,120)
A visitor to the city of Canterbury	2.3% (31)
A worker in the Canterbury district	2.5% (33)
A business, organisation or community group  - 1st Littlebourne Scout Group  - A W Estates England Limited  - ACRA Alliance of Canterbury Residents Associations  - Avison Young of behalf of the University of Kent  - Aylesham Parish Council  - Bekbuild Kent Ltd  - Canterbury Alliance for Sustainable Transport  - Canterbury Diocesan Enterprises Limited  - Canterbury District Green Party  - Canterbury Rugby Club  - Cantley Limited  - CBRE  - City of Canterbury Swimming Club  - Clifford Construction Ltd  - Datum Groundworks Ltd  - Defined Wine Ltd  - Denton Homes Ltd  - DHA Planning  - DHA Planning - Porchlight  - DHA Planning representing Persimmon Homes  - EMIC  - Friends of Dukes and Neals Place Meadows  - Goddard Planning  - H W Twyman  - Hawarden Farming  - Hyde Group and Chartway Group  - JIG Planning & Development Ltd  - Kent County Council  - Kent Omithological Society  - Kent SME Network  - Lenleys  - Lifestory Group  - Mermaid Inn  - Mulberry Estates (Bridge) Limited  - NHS Kent and Medway  - Nonington Farms  - Oaten Hill and South Canterbury Association  - Option 2 For You  - Planning Issues Ltd. on behalf of Churchill Retirement Living  - Rydon Homes Limited  - Savills Pic	6.0% (80)

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- SOS WHITSTABLE	
- South East Water	
- Southern Water	
- Sport England	
- St Michael's Road Area Residents' Association (Canterbury)	
- St Stephens Residents Association	
- Stagecoach South East	
- Studd Hill Residents Association Ltd.	
- Sustrans	
- Thanet Way Residents Association	
- The Canterbury Society	
- The Woodland Trust	
- Theatres Trust	
- TQS Limited	
- Union 4 Planning on behalf of Telereal Securitised Properties	
- Wates Developments Ltd	
- Wedgewood Land & Investments Ltd	
- Whitstable Beach Campaign	
- Whitstable Medical Practice	
- Womenswold Parish Council	
- Woodchurch Property (BK) Limited	
- WSP on behalf of Homes England	
- Yorkletts Residents' Association	
A city, county, parish or town councillor	1.1% (15)
- Parish or town council councillors x10	
- Canterbury City Council councillors x3	
- Kent County Council councillors x2	
An MP	_
All IVII	-
Other	4.3% (58)
- An agent x15	' '
- A former resident of the Canterbury district x14	
- A resident adjoining the Canterbury district x12	
- A planning consultant x6	
- A family relative of a Canterbury district resident x3	
- A member of a residents' group x3	
- A prospective resident of the Canterbury district x2	
- A councillor x2	
- A person of faith x1	

Responses by age group were fairly balanced, though the highest proportion of respondents were aged between 55 and 64. This was followed by a high portion of respondents ages 65 to 74:

Under 18	1.8% (24)
18 to 25	3.4% (45)
26 to 34	7.2% (96)
35 to 44	14.7% (197)

45 to 54	17.1% (229)
55 to 64	21.0% (281)
65 to 74	19.4% (260)
75 to 84	7.1% (95)
85 and above	1.6% (22)

NB: 88 respondents (6.6%) did not give their age

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

Male	49.2% (658)
Female	43.6% (583)
Prefer to self-describe	3 (0.2%)

NB: 93 respondents (7%) did not give their age

# 4. Analysis of written comments

# 4.1. Chapter 1: Spatial Strategy for the district

Chapter 1 set out the District Vision and Strategic Objectives which inform all policies within the draft plan. The chapter included policies reflecting five key strategies for environment, sustainable design, development, movement and transportation and infrastructure which together comprised the overall strategy for managing growth and development in the district to 2045.

Overall, Chapter 1 received **2,458** representations which included **2,437** written comments. A higher number of comments were received for Policy SS4 (Movement and Transportation Strategy) and Policy SS3 (Development Strategy) but overall, this Chapter received a lot of feedback.

For **Policy SS1 - Environmental strategy for the district**, over one third of comments related to the protection of green and open spaces in the district. Other comments highlighted the Local Plan's negative impact on the environment and expressed desire to see increased biodiversity commitments throughout the Plan.

For **Policy SS2 - Sustainable design strategy for the district**, the most frequent issues raised were around the high level of housing growth proposed, the need to protect World Heritage Site status and support for the council's ambitions for net-zero growth.

For **Policy SS3 - Development strategy for the district**, similar themes were raised around the level of housing growth and the protection of green spaces in the district. Other comments suggested improvements to infrastructure, specifically for public transport and sewage, were needed to support any new development.

For **Policy SS4 - Movement and transportation strategy for the district**, the most common issues raised were around the proposed Canterbury Circulation Plan and specific concerns around the proposals for Rough Common Road and the Eastern Movement Corridor. Respondents felt that the circulation plan would not solve traffic congestion and would instead increase pollution and make car journeys longer.

For **Policy SS5 - Infrastructure strategy for the district**, one third of respondents felt that infrastructure improvements should be a priority. Enhancements in sewage and water supply were deemed important and respondents said that these improvements should take place before the development of more houses.

Detailed analysis of the comments relating to all policies in this Chapter are set out in **Appendix 3.3.1.** 

# 4.2. Chapter 2: Canterbury

Chapter 2 included the Vision for Canterbury together with the Canterbury City Centre Strategy. The chapter set out the strategic policy framework for development in the urban area of Canterbury and included site allocation policies for a range of developments across the city, including two strategic development areas to the east and south west of the city, which will make a significant contribution to the district's housing and infrastructure needs.

Overall, Chapter 2 received **6,876** representations which included **3,437** written comments. A higher number of comments were received for Policy C16, Policy C1, Policy C6, Policy C5, and Policy C11 and the main themes included protecting the environment and ensuring appropriate infrastructure is in place for increased development. Significant opposition was made to the Canterbury Circulation Plan and the proposal to divide the city into zones, along with the Eastern Movement Corridor.

For **Policy C16 - Canterbury Eastern Movement Corridor**, a large portion of respondents expressed concern for significant environmental impacts and made specific reference to Chequer's Wood and Old Park Site of Special Scientific Interest. Others felt that the estimated costs were unrealistic and suggested that infrastructure funding should be spent on alternative schemes with greater benefits.

For **Policy C1 - Canterbury City Centre Strategy**, most comments objected to the Canterbury Circulation Plan believing that it would negatively impact residents and ruin the city centre as it stands. Other comments suggested that residents would like to see an improvement to shops and overall infrastructure.

For **Policy C6 - Land at Merton Park**, the most frequent issues raised were around the loss of greenfield land. Respondents felt that this would impact biodiversity and that the loss of agricultural land would increase food insecurity. Others raised concerns around traffic, particularly around Wincheap, and suggested that new residents would be reliant on their vehicles, conflicting with council's responsibility to reduce the district's carbon footprint. There was some support for development at Merton Park, including the sports provision.

For **Policy C5 - South West Canterbury**, comments were quite general but focused primarily on protecting the landscape from excessive housing development and improving infrastructure such as health care provision in the area.

For **Policy C11 - East Canterbury**, the most frequent issues echoed those relating to Policy C16 and objected to the Eastern Movement Corridor proposals. Respondents felt that the policy's proposals would harm the environment and increase traffic in the area.

Detailed analysis of the comments relating to all policies in this Chapter are set out in **Appendix 3.3.2.** 

## 4.3. Chapter 3: Whitstable

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

Overall, Chapter 3 received **2,549** representations which included **1,822** written comments. A higher number of comments were received for Policy W5, Policy W4, and Policy W8 and the main themes were around the loss of greenfield land, infrastructure capacity in the area (including for transport and community needs) and the need to provide additional housing to meet the varied requirements of our communities.

For **Policy W5 - Land at Brooklands Farm**, the most frequent issues raised were around the need for improvements to walking and cycling, concerns about community infrastructure including health care and the need for different types of housing, including for older people.

For **Policy W4 - South Whitstable**, the most frequent issues raised were around the need to retain Green Gaps and avoid urban sprawl into the countryside. Respondents recognised a need to increase social housing numbers and improve overall infrastructure in the area.

For **Policy W8 - Bodkin Farm**, the most frequent issues raised were around the transport impacts of the proposals, including the need to widen the cycle path. Others commented regarding the loss of the Green Gap between Whitstable and Herne Bay and disagreed with the policy.

Detailed analysis of the comments relating to all policies in this Chapter are set out in **Appendix 3.3.3**.

# 4.4. Chapter 4: Herne Bay

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

Overall, Chapter 4 received **488** representations which included **263** written comments. A higher number of comments were received for Policy HB4, Policy HB3, and Policy HB1 and the main themes were around traffic concerns in the area.

For **Policy HB4** - **Land to the west of Thornden Wood Road**, the most frequent issues raised were around traffic and congestion associated with the proposals for a new secondary school. Some respondents commented on the need to protect the Green Gap between Herne Bay and Whitstable and preserve the existing natural landscape but others supported the construction of new schools in the area.

For **Policy HB3 - Herne Bay urban area**, comments on this policy covered a very wide variety of specific matters with little commonality.

For **Policy HB1 - Herne Bay Town Centre Strategy**, the most frequent views included support for the approach to development. Other comments received related to a variety of matters, such as issues with the consultation itself and the proposed change to the town centre boundary.

Detailed analysis of the comments relating to all policies in this Chapter are set out in **Appendix 3.3.4.** 

## 4.5. Chapter 5: Rural areas

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

Overall, Chapter 5 received **6,339** representations which included **3,185** written comments. A higher number of comments were received for Policy R1 (Cooting Farm, Adisham), Policy R22 (Cooting Lane, Adisham) and Policy R2 (Rural Service Centres). For all of these, the main themes were associated with opposition to development and most respondents highlighted concerns for the natural environment and wildlife and the loss of agricultural land.

For **Policy R1 - Land at Cooting Farm**, comments expressed significant opposition to the proposals for a new settlement at this location. Respondents cited concerns over the natural environment, protection of heritage assets, pollution, and the wider community's wellbeing more generally.

For **Policy R20 - Aylesham south**, respondents raised significant concerns around traffic congestion, pollution, and water infrastructure.

For **Policy R2 - Rural service centres**, respondents expressed opposition to development and the reasons for this were based around inadequate existing community facilities and infrastructure as well as concerns for the character of existing settlements.

The following settlements are all classified as Rural Service Centres within Chapter 5.

In **Blean**, respondents felt that increased housing would add to congestion in the area. They also expressed concerns about flooding and commented that the proposed development at Mill Field (Policy R4) would affect the character of the village.

Regarding **Bridge**, various comments opposed Bridge becoming an urbanised part of Canterbury. Regarding Great Pett Farmyard (Policy R6) in particular, respondents felt that the wording of policy should be more reflective of the site and its context.

Within policies relating to **Chartham**, respondents had a number of different concerns. Existing rural road infrastructure was highlighted and deemed unsuitable for additional development, particularly in respect of Land to the west of Rattington Street (Policy R8). Other comments raised significant concerns for pollution, in respect of air quality and sewage in particular. A number of respondents raised issues of local infrastructure and its ability to cope with the level of development proposed.

For **Hersden**, comments covered a wide range of issues. Notable emphasis that Hersden has seen a significant number of new houses already built in the current Local Plan was prevalent among responses. Similar to the other rural service centres, respondents felt that Hersden cannot cope with the level of development proposed and specific reference was

made to the capacity at the new Sturry link road (A28) and the impact of development on the Stodmarsh protected sites.

In **Littlebourne**, respondents felt that development would have a detrimental effect on biodiversity and lead to the loss of good quality agricultural land. Concerns raised about the proposed allocation at The Hill (Policy R15) related to water issues, including supply, flooding and sewage. Generally speaking, various respondents felt that the policies relating to Littlebourne were out of character with the settlement and that existing roads and community infrastructure would be unable to cope with proposed development.

In the case of **Sturry**, traffic concerns were frequently mentioned, including in respect of the proposed development at Popes Lane (Policy R18). This linked closely with concerns that current road infrastructure is inadequate which would contribute to increased congestion. The loss of agricultural land was also cited as a reason for objection to the development.

For **Policy R21 - Local service centres**, comments disputed the classification of settlements such as Adisham, Hoath, and Wickhambreaux. Respondents suggested that these settlements had been incorrectly categorised as Local Service Centres when instead they should be Villages. Although some felt that Policy R21 should support minor infill development in these settlements, others stated that the policy was too restrictive and should allow for more organic growth.

The following site allocations are all identified within settlements classified as Local Service Centres within Chapter 5.

For **Policy R22 - Land west of Cooting Lane and south of Station Road**, **Adisham** comments were again overwhelmingly in opposition to the proposed development, echoing the comments received on the proposed new settlement at Cooting Farm, Adisham (Policy R1).

For **Policy R26 - Broad Oak Reservoir and Country Park**, respondents generally agreed that the proposal was needed. The delivery of the new reservoir was deemed vital and comments suggest that this should be done as soon as possible to ensure fresh water supply for new and existing homes in the district. Several comments highlighted strong support for the country park elements of the proposal, including the provision of watersports and recreational facilities.

For **Policy R27 - Land at Church Farm**, a high number of comments opposed the development of agricultural land. Respondents commented that Hoath is not a sustainable village for new housing development and that the scale of the proposed development would not be in keeping with the character of the village.

For **Policy R28 - Countryside**, many respondents drew comparisons between the protection afforded to the countryside and the proposals for a new settlement at Cooting Farm, Adisham (Policy R1). Respondents recognised the need to restrict development in the countryside to protect its rural character.

Detailed analysis of the comments relating to all policies in this Chapter are set out in **Appendix 3.3.5.** 

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

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

Overall, Chapter 6 received **3,742** representations which included **1,977** written comments. A higher number of comments were received for Policy DS6, Policy DS21, and Policy DS1. The main themes were relatively mixed, reflecting the variety of topics covered in the chapter.

In terms of the **housing and new communities** section of the Chapter, the policies with the most comments were Policy DS6 and Policy DS1.

For **Policy DS6 - Sustainable design**, the most frequent issues raised were around the requirement for new dwellings to have solar panels and electric vehicle charging. Various other comments focused on sustainability credentials of new development in the district, such as for water and energy efficiency. However, a number of comments also highlighted challenges to the deliverability of the council's proposed net zero policies and suggested that these should align with the government targets instead.

For **Policy DS1 - Affordable housing**, various comments received highlighted the affordability of housing in the district for local people, including first time buyers. Respondents felt that the national definition of 'affordable housing' does not reflect local needs or circumstances. Many respondents commented on the need for social housing provision too and sought stronger policies to secure new affordable homes for people.

Regarding **employment and local economy**, the policy with the most comments was Policy DS9.

For **Policy DS9 - Education and associated development**, comments raised the view that the University of Kent's southern slopes should be protected from development. Respondents also felt that we should not plan for additional student accommodation.

**Movement and transportation** was the third section within Chapter 6. The policy with the most comments here was Policy DS13.

For **Policy DS13 - Movement hierarchy**, the most prevalent comments raised were around the need for better transport in the district. Numerous respondents said that better quality walking and cycling routes are needed. Many respondents were supportive of the policy, including the hierarchical approach to prioritising active travel and low carbon transport, although some commented on the importance of considering those who cannot walk or cycle.

Finally, the section on **open space**, **natural and historic environment** received a high volume of comments in comparison to the other 3 sections. Here, Policy DS21 and Policy DS19 received the most comments.

For **Policy DS21 - Supporting biodiversity recovery**, respondents highlighted the need to protect Blean Woods, Old Park, and Chequers Wood and a number of comments referenced the impact of the proposed Eastern Movement Corridor on protected habitats. While some respondents supported the approach to biodiversity netgain and tree cover, others requested that the policy should be aligned to national provisions.

For **Policy DS19** - **Habitats**, **landscapes and sites of local importance**, comments covered a wide array of matters. Again, the main themes were around the need to protect Old Park and Chequers Wood (including in respect of its landscape). Comments generally advocated for the protection of open spaces and undeveloped land. In addition, respondents stated that the comment should seek to better connect areas of locally important habitats.

Detailed analysis of the comments relating to all policies in this Chapter are set out in **Appendix 3.3.6**.

# 4.7. Chapter 7: Development management policies

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

Overall, Chapter 7 received **1,647** representations which included **555** written comments. A higher number of comments were received for Policy DM18, Policy DM17 and Policy DM15, and between these and the rest of the wider Chapter there was general support for most policies. Many comments suggested minor tweaks or changes to policy emphasis.

For **Policy DM18 - Light pollution and dark skies**, there was general support for the policy and numerous respondents encouraged the council to designate specific areas in the district as 'dark sky zones', including Old Park and Chequers Wood.

For **Policy DM17 - Noise pollution and tranquillity**, there was general support for the policy and numerous respondents encouraged the council to designate specific areas in the district as 'tranquil zones', including Old Park and Chequers Wood.

For **Policy DM15 - Sustainable drainage**, there was general support for the council's expectation on all developments to integrate sustainable drainage systems. Other comments highlighted the need for conditions to be used to ensure SUDS are in place before developments are occupied.

Detailed analysis of the comments relating to all policies in this Chapter are set out in **Appendix 3.3.7.**