**Draft Canterbury District Local Plan to 2045**

# **Chapter 7: Development Management Policies**

| **Policy** | **Number of written comments** |
| --- | --- |
| DM1: Conversion of existing rural buildings | 25 |
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## Policy DM1: Conversion of existing rural buildings

| **Comment** | **Number of comments** |
| --- | --- |
| Typo in 1h - 'compliments' | 2 |
| Existing buildings may not reflect local vernacular character | 2 |
| Local infrastructure won't cope | 2 |
| Investment must be considered for rural roads | 2 |
| Too much emphasis on building houses | 2 |
| Insufficient delivery of services | 2 |
| Little consideration to risk/reward for rural communities compared to urban | 1 |
| Restoration of unsound structures with heritage value should be considered | 1 |
| Support proposal | 1 |
| Should not be selling agricultural land or buildings - needed for food | 1 |
| Putting profit over everything | 1 |
| Agricultural buildings should only be repurposed when not required for original use | 1 |
| Should be natural development rather than farmers selling off land | 1 |
| Overly restrictive | 1 |
| Doesn't correspond with PD rights for agricultural conversions | 1 |
| Should be greater recognition of benefits of conversion to residential use | 1 |
| Only allow conversion if the building has heritage value | 1 |
| Remove buildings erected under agricultural building consent - return to open countryside | 1 |
| Policies referring to constraints to cross reference, stating development proposals must accord | 1 |
| No conversion of metal or concrete hay barns, machinery stores or horse shelters into residential dwellings | 1 |
| Not consistent with national policy/NPPF | 1 |

All of the representations made on this policy have been analysed and considered. The policy has been edited to ensure that alterations to buildings are reflective of the local character and where the building itself does not reflect the local character, the alterations will be used as an opportunity to enhance the reflection of local character within the building.

The policy has been reviewed and edited to ensure that it complies with permitted development rights and has also been reviewed alongside the NPPF to ensure compliance.

## Policy DM2: Residential garden land

| **Comment** | **Number of comments** |
| --- | --- |
| Watering down' back land' development policy' | 2 |
| Specify the area boundary where the policy applies. | 2 |
| Too much emphasis on building houses | 2 |
| Insufficient delivery of services | 2 |
| Little consideration to risk/reward for rural communities compared to urban | 2 |
| Adverse effects on flood risk, groundwater recharge and increased runoff | 1 |
| Will place additional pressure on existing infrastructure | 1 |
| Apply requirements of DM14 | 1 |
| Support for zero water use - encourage greywater reuse and water harvesting | 1 |
| Impact on wildlife | 1 |
| Impact on mental health | 1 |
| Should only be allowed in exceptional circumstances | 1 |
| Support proposal | 1 |
| Gardens are important for biodiversity | 1 |
| Gardens development in conservation areas would cause damage to location and countryside | 1 |
| (e) character of the neighbourhood and the streetscene | 1 |
| Retain garden trees | 1 |
| Mitigate the loss of hard standing | 1 |
| Loss of privacy, overlooking or overshadowing | 1 |

All of the representations made on this policy have been analysed and considered. The policy has been refined to exclude areas outside of a settlement boundary, ensuring that the policy is specific in the locations in which it applies. The policy has also been amended to ensure that wherever possible garden trees and important landscaping features are retained.

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

| **Comment** | **Number of comments** |
| --- | --- |
| Agree with policy | 8 |
| Areas with high HMO count shouldn't be allowed more (section 2) | 5 |
| More HMOs are becoming family homes again | 4 |
| HMO's all used by students/ inaccessible to community | 4 |
| Contain rubbish - provide extra bin | 4 |
| No need for additional investment in HMOs due to student accommodation | 2 |
| Convert back to family homes to reduce reliance on agricultural land to build on | 2 |
| No means to manage / poor enforcement | 1 |
| Bias towards property developers | 1 |
| Wasted resources on building student accommodation rather than affordable housing | 1 |
| Properties all bought by student landlords. Families can't buy houses | 1 |
| 10% target is too high. Exceeded in many areas | 1 |
| High numbers of HMOs reduce affordable housing | 1 |
| Places of worship needed | 1 |
| Parking becomes an issue as a result of HMOs | 1 |
| Clusters of HMOs ruin character of place | 1 |
| Fails to require HMOs to provide accommodation to meet national space standards | 1 |
| Need for HMOs is reducing | 1 |

All of the representations made on this policy have been analysed and considered. No changes have been made to this policy.

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

| **Comment** | **Number of comments** |
| --- | --- |
| Support the policy | 8 |
| More recycling is beneficial | 2 |
| Demolition should be a last resort | 2 |
| Make it more favourable to refurbish rather than demolish | 1 |
| Ensure high quality materials used in construction | 1 |
| No mention of household waste | 1 |
| Policy needs specific targets | 1 |
| Support should be given when meeting standards as well as exceeding | 1 |
| More needed/policy isn't enough | 1 |
| How will this be managed? | 1 |
| How will this be funded? | 1 |
| (3) - Should be applied to smaller developments too | 1 |
| Should include policy ensuring the cleanliness of generators, site vehicles, dust management and retention of soils | 1 |
| Revised local plan must ensure all actions are taken | 1 |
| Lack of detailed design information | 1 |
| Recognise limitations of outline planning application which can be resolved during detailed design and communication in reserved matters applications | 1 |

All of the representations made on this policy have been analysed and considered. The policy has been amended to ensure that the minimum requirement is to ensure that requirements are met and do not have to be exceeded. The policy has also been amended to require a Construction Environmental Management Plan at the detailed stage of planning, also setting out the details and requirements for this management plan.

## Policy DM5: Parking design

| **Comment** | **Number of comments** |
| --- | --- |
| Building plots developed will make parking spaces obsolete | 3 |
| Parking bays are too small | 2 |
| Selling off City centre car parks which could be made to fit criteria | 1 |
| No min provision per dwelling | 1 |
| Agree with impermeable paving policy | 1 |
| More cycle parking | 1 |
| Reduce car parking in sustainable locations | 1 |
| Allow for enough parking provision in suburban areas | 1 |
| Grasscrete as a permeable paving option | 1 |
| Ineffective enforcement of policy | 1 |
| Agree with tandem parking policy | 1 |
| Policy needs strengthening/more detail | 1 |
| Need more parking spaces to encourage shopping in towns | 1 |
| Tree planting in car parks should be obligatory | 1 |
| Priority parking for carpool hubs | 1 |
| Additional cost for multiple cars per household | 1 |
| Support proposal | 1 |
| No new developments without off street parking | 1 |
| Electric vehicle charging from home | 1 |
| Supports inclusion of trees | 1 |
| Disagrees with tandem parking policy, should be considered on site-by-site basis | 1 |
| Flexible approach to parking is needed | 1 |
| Against the use of CCTV | 1 |
| Against cluttered street furniture | 1 |
| Switch to LED light bulbs is bad for wildlife and light pollution | 1 |
| No plans for electric charge points or related EV infrastructure | 1 |
| Increase certainty in point (i) | 1 |
| Avoid the use of existing residents parking | 1 |
| Cross reference to D21 and any guide on planting selections | 1 |
| Parking should be discouraged | 1 |
| EV charging should be provided for every new space | 1 |

The comments have been reviewed and considered. The policy for parking standards needs to have sufficient flexibility to reflect site specific conditions and to ensure that new developments do not result in an overspill of parking onto footways and verges within the developments, or create any additional pressure on existing on-street parking. Point 1h has been expanded to include a requirement for electric vehicle parking spaces and charging points to be sited and designed for ease of access.

Additional requirements for adding vegetation to off street parking, and specific requirements for hydraulic cycle racks have been added to the parking standards in Appendix 3.

## Policy DM6: Extensions and alterations to existing buildings

| **Comment** | **Number of comments** |
| --- | --- |
| Support policy | 4 |
| Central government has made hard for local council's to regulate | 1 |
| Increased rain water runoff into sewer system shouldn't be allowed | 1 |
| Tougher criteria needed in conservation areas | 1 |
| Impact on wildlife and green space | 1 |
| Should meet the same environmental standards as new builds | 1 |
| Should not be able to upscale largely e.g. from 2/3 bedrooms to 4/5 | 1 |
| Extensions should be restricted in order to maintain character of surrounding properties | 1 |
| Limit on extensions as to not drain local resources | 1 |
| Bungalows should not be permitted to extend upwards | 1 |
| Add policy to retain garden trees and landscaping features that make a positive contribution | 1 |
| Local plan concept contradicts environmental policy | 1 |
| Should include parking standards | 1 |

All of the representations made on this policy have been analysed and considered. Criteria 1c has been amended to ensure that extensions and alterations to existing buildings are not detrimental to living conditions.

## Policy DM7: Health and crime impact assessments

| **Comment** | **Number of comments** |
| --- | --- |
| Support policy | 4 |
| Crime increase since Redbridge arrived | 2 |
| Vehicle noise/traffic surrounding takeaways at night needs to be addressed | 2 |
| Address capacity issues before any population growth | 2 |
| Betting shops should be banned from town centre | 1 |
| No workable finance model to build new hospital | 1 |
| Until central gov funding, cannot make the hospital special measures | 1 |
| Reckless and irresponsible to commit to population growth without committing to regeneration of nhs healthcare facilities | 1 |
| Local GP surgeries run by paramedics due to lack of recruitment and staffing problems | 1 |
| Focus is too heavily on building houses and not on provision of services | 1 |
| What will a 'crime impact statement' achieve? | 1 |
| Paragraph 3 too vague | 1 |
| Categorising HIA and CIA together makes for lack of clarity/Split into two sections | 1 |
| Policy needs defined targets | 1 |
| Framework for the policy consulted with key service stakeholders | 1 |
| Extend policy to consider resources | 1 |
| CIA often contradicts walking and cycling infrastructure which is what is required. Walking and cycling infrastructure should take priority | 1 |
| High density housing causing increase in crime rates | 1 |
| Give consideration to changing eating habits | 1 |
| More unhappy people will cause more crime. Likely to be the case for vast increase of inhabitants in district | 1 |
| How will crime and security risk be identified? | 1 |
| HIA and CIA are unnecessary and provide limited benefit | 1 |

All of the representations made on this policy have been analysed and considered. The supporting text for this policy has been amended to clarify that health and crime impact assessments should be carried out at an early stage of the design and masterplanning process.

## Policy DM8: Shopfronts

| **Comment** | **Number of comments** |
| --- | --- |
| Lack of enforcement | 3 |
| Policy should include inappropriate lighting and advertising | 3 |
| Support policy | 2 |
| Decision should be left to the shopkeepers | 1 |
| Policy is not strong enough | 1 |
| Make reference to the council's guide on shopfronts | 1 |
| External metal shutters should be banned - lead to more anti social behaviour | 1 |
| Disparity in quality of historic shop fronts at ground level and at upper storeys | 1 |
| Shop frontages shouldn’t be at the expense of the historic character of the building | 1 |
| Shop loss should be a priority | 1 |
| No plastic or illuminated signs | 1 |
| Policy needs to be stronger | 1 |
| Policy should outline expectations/leaflet with expectations to be published | 1 |
| Planning applications for shop fronts should be rigorously monitored | 1 |
| Policy is unrealistic | 1 |
| Individualistic approach | 1 |
| Ensure disabled access | 1 |
| No guidelines referenced | 1 |

All of the representations made on this policy have been analysed and considered. Reference to the Shopfront Guidance has been added and criteria 1b has been amended to clarify that new shop fronts are proposed with appropriate materials, as well as an architectural style.

## Policy DM9: Advertisements

| **Comment** | **Number of comments** |
| --- | --- |
| Support policy | 4 |
| Must be restrictions on lighting | 3 |
| Less fear based advertising | 1 |
| Encourage people to be happy with what they have | 1 |
| Include direct mention of A boards | 1 |
| No mention of restrictions in conservation areas | 1 |
| Promotion of obesity should be banned | 1 |
| Enforcement | 1 |
| Policy fails to mention advertisements in rural settings | 1 |
| Impact of advertisements on AONB | 1 |
| Adopt the 'Kent Downs AONB Rural Street and Lanes: A Design Handbook' as a supplementary planning document | 1 |

All representations made on this policy have been analysed and considered. The supporting text for this policy has been amended to include A-boards as an example of advertisements which can damage the street scene and impact the character of an area. Text was added within the policy to clarify that the policy is applicable district-wide.

## Policy DM10: Residential annexes and ancillary accommodation

| **Comment** | **Number of comments** |
| --- | --- |
| Should result in no loss of privacy, overlooking, or overshadowing | 2 |
| Support policy | 2 |
| Policy to be considered in line with DM6 | 1 |
| Should integrate with character of existing building | 1 |
| Should only be allowed for the use by a relative or dependant | 1 |
| Inadequate enforcement | 1 |
| No reference to waste | 1 |
| No reference to parking | 1 |

All of the representations made on this policy have been analysed and considered. No changes have been made to this policy.

## Policy DM11: Residential design

| **Comment** | **Number of comments** |
| --- | --- |
| Does the 2.4m ceiling requirement apply to apartments? | 4 |
| How does dual and triple aspect apply to terraced housing? | 4 |
| Support 2(m) | 3 |
| Support policy | 2 |
| Policy needs to be more specific in regards to wording e.g. 'good daylight'. Quantify | 2 |
| Should not refer back to earlier designs | 1 |
| Encourage/require solar panels where appropriate | 1 |
| Requirement to insulate for noise transmission between floors | 1 |
| Encourage indoor cycle parking | 1 |
| 2(d) changes houses to dwellings | 1 |
| 2(d) no north facing dwellings may be single aspect only | 1 |
| 2(h) add a height minimum | 1 |
| 2(i) amend parking design requirements | 1 |
| 2(k) add cycle parking should be integrated into the building fabric | 1 |
| Supports the inclusion of permeable paving | 1 |
| Too much focus on building houses and not on delivery of services to make development sustainable | 1 |
| Requirements for exterior design and relationships between buildings | 1 |
| Add policy on tree retention and new planting | 1 |
| Add to 2(m) preference for trees to be UK & Ireland sourced and grown | 1 |
| Modern architecture is missing from the district | 1 |
| Healthcare facilities and places of worship should be interspersed | 1 |
| Design codes are inadequate | 1 |
| NPPF economic development gains always win out | 1 |
| Policy to require developers to provide evidence to prove they can satisfy building regulations | 1 |
| Policy not properly justified or effective | 1 |
| Requirements not tested for viability | 1 |
| 2(b) goes above standards set out in Government's Technical housing standards | 1 |
| 2(a) not tested in evidence base | 1 |

All of the representations made on this policy have been analysed and considered. Point l has been removed from the policy. Point m has been expanded to require new planting schemes to include native species and encourage biodiversity as well as the requirement for all homes with gardens to include a minimum of one fruit tree.

## Policy DM12: Non-residential design

| **Comment** | **Number of comments** |
| --- | --- |
| Support policy | 3 |
| Include permeable paving policy | 1 |
| Add in reference to vehicle parking and charging | 1 |
| Standards are too vague, add measurable targets | 1 |
| No mention of places of worship with community halls | 1 |
| Opening windows as an alternative to air conditioning | 1 |
| Encourage solar panels on appropriate roofs | 1 |
| Criteria to ensure safe access | 1 |

All of the representations made on this policy have been analysed and considered. As suggested within the representations received in relation to DM12, the policy has been amended to ensure that where appropriate, shared surfaces should be built with permeable paving. The definition of ‘community facilities’ has been revised to ensure that it makes reference to places of worship.

## Policy DM13: Biomass technology

| **Comment** | **Number of comments** |
| --- | --- |
| Burning trees for electricity is unsustainable | 3 |
| Biomass technology that uses wood should be rejected | 2 |
| Questionable carbon reduction claims for wood chip boilers | 1 |
| Incorporate renewable energy to mitigate effects | 1 |
| Incorporate a heat exchange mechanism for further energy production | 1 |
| Encourage to use alternative, such as electric/heat pumps | 1 |
| Biomass technology is highly risky | 1 |
| Biomass technology should not be permitted | 1 |
| Biomass technology that creates green gas from grass should be considered | 1 |
| Support policy | 1 |
| Sandwich Biomass plant is a disaster | 1 |
| More detail is needed on the type of biomass technology | 1 |
| Emissions must be controlled | 1 |
| Source of fuel must be locally sourced and circular | 1 |
| New wind farms/turbines as a preferred alternative | 1 |
| Inadequate air quality monitoring at present | 1 |
| Clarity needed as to whether policy applies to waste and/or non-waste derived fuel systems | 1 |
| Should apply only to waste derived fuel systems | 1 |

All of the representations made on this policy have been analysed and considered. The policy has been amended to minimise ambiguity and clarify the council’s policy in relation to using waste derived fuels within biomass technology as raised within the consultation responses.

## Policy DM14: Flood risk

| **Comment** | **Number of comments** |
| --- | --- |
| Building on flood plains should be banned | 5 |
| SUDS will have to account for existing spring and stream at the top of site R15. Unlikely to cope | 3 |
| No suggestion of how flood defences will be built into existing infrastructure | 2 |
| Policy should not prejudice towards soft landscaping solutions, consider 'blue roofs' and 'water squares' as hard landscaping SUDS | 2 |
| Supports policy | 1 |
| Little consideration given to the cost/benefit to rural communities | 1 |
| Enforcement is essential | 1 |
| Sewage systems cannot cope with the proposed developments | 1 |
| Current sewage system problems should be resolved before adding additional pressure on existing resources/ already at capacity | 1 |
| Already too high flood risk due to climate change, additional home will only increase flood risk | 1 |
| Developers to take on ongoing responsibility for flood risk management for sites | 1 |
| Geographical scope of Sequential Test is not defined. Needs more clarity | 1 |
| Policy to monitor and measure must be in place | 1 |
| Extensive construction of eastern bypass will exacerbate flood risk in this area | 1 |
| Proposed housing allocations and loss of agricultural land will just exacerbate flooding | 1 |
| How will policy be implemented? | 1 |
| Canterbury's WWTW is not upgraded until 2030. Housing should not be constructed before this is in achieved | 1 |
| Nutrient credit' disingenuous | 1 |
| Mitigation ponds should be put in all developments with transparent analysis of effectiveness | 1 |
| Effectiveness and financing of flood risk mitigation should be planned well into the future with clear lines of responsibility and sanctions | 1 |
| Policy outlines minimum standards | 1 |
| Policy doesn't read well, split (e) into two separate sections | 1 |
| Ensure that discharge locations have capacity to receive all foul and surface water flows from a development | 1 |
| Consider further flood risk defence around railways | 1 |
| Policy should be in line with NPPF stating no new development will create or exacerbate off-site flood risk | 1 |
| No reference to Strategic Flood Risk Assessment | 1 |
| No reference to how the decision to exempt the town centre from the sequential test has been made | 1 |
| (h) to make reference to general amenity in list of benefits | 1 |
| Failure to follow 'infrastructure first' principle would result in policy failure | 1 |

All of the representations made on this policy have been analysed and considered. The policy has been strengthened in line with concerns raised through the consultation responses, ensuring that off-site flood risk is not created or exacerbated by new developments and that flood risk is maintained effectively over the lifetime of the development.

## Policy DM15: Sustainable drainage

| **Comment** | **Number of comments** |
| --- | --- |
| Support SUDS policy | 10 |
| Planning conditions should be in place to prevent occupation until SUDs proved in place and/or relevant improvements have been made | 5 |
| Policy needs to be stronger and a priority | 4 |
| Developments should have to consult with Southern Water | 3 |
| Developments should have to prove that they won't increase pressure on existing systems | 3 |
| Areas of impermeable hard standing should be refused | 3 |
| Less sewage needs to be dumped into the ocean | 2 |
| Little consideration given to the cost/benefit to rural communities versus Canterbury city centre | 2 |
| Development should incorporate the use of grey water as standard | 2 |
| Resources for developments cannot be met | 2 |
| Emergency measures are already in place due to full capacity | 2 |
| Tanking of sewage to Stodmarsh is unsustainable | 1 |
| New developments should not happen until existing problems resolved | 1 |
| Climate change and surface water are already putting homes at risk of flooding | 1 |
| Concerned about the prospect of flooding | 1 |
| Good in principle | 1 |
| Discharge into a combined sewer isn't an acceptable solution | 1 |
| Design must include water capture | 1 |
| Who is going to fund monitoring, maintenance and recovery? | 1 |
| Sustainable drainage will become harder in the winter | 1 |
| Problems will multiply with new housing developments | 1 |
| Best solution to sewage problems is to reduce the scope of the plan | 1 |
| Overlap with policy DS20 - can you not combine policies? | 1 |
| Sustainable drainage should be required for all new developments | 1 |
| Unless approved no discharge of surface runoff from any completed development | 1 |
| Concerns over implementation | 1 |
| Past planning requirements have not been met | 1 |
| No new housing should be constructed until Canterbury's WWTW are upgraded (2030) | 1 |
| Nutrient credit' concept is disingenuous | 1 |
| Any new developments must include mitigation ponds with continued analysis of effective with financing and monitoring planned into the future with clear lines of responsibility and sanctions | 1 |
| Needs to address water discharge into ground in source protection zones | 1 |
| Use tree planting to manage flood risk | 1 |
| Create a design guide | 1 |
| SUDs should not be considered as contributions to biodiversity. Drainage features do not get clean water | 1 |
| Clearer guidance on measuring water quality and surface run-off | 1 |
| Sustainable Drainage Plans must be up to date with CIRIA SuDS Guidance and include management and maintenance plans | 1 |
| Monitoring of surface run-off and phosphate levels should be included in plans and reported to planning departments | 1 |
| Construction and drainage plans should include how they will deal with surface run-off through construction | 1 |
| Remove policy allowing the use of combined sewers, especially for smaller sites | 1 |
| Formalise Swalecliffe pathfinder project in policy | 1 |
| Clarity as to where to find stipulated greenfield runoff rates | 1 |
| Requirement for evidence as to why SuDS are not appropriate, to include cost comparisons against standards systems | 1 |
| Further requirements for delivery of SuDS demonstration | 1 |
| R1 would sit on an important aquifer | 1 |
| Failure to follow 'infrastructure first' principle would lead to failure of this and other policies | 1 |
| Should be no discharge of surface water from any development following completion | 1 |

All of the representations made on this policy have been analysed and considered. The former point c, requiring development to follow a drainage hierarchy has been removed. The policy has been amended so that where the cost of providing a SuDS is the main constraint on development, a full cost comparison against a standard system will be required. The policy now also requires the management and maintenance plans for the surface water drainage system to plan for the phase of construction as well as following completion of the development. For major and strategic developments the policy will also now require clear details pertaining to the planned infrastructure, including discharge rates, discharge volumes and impermeable areas of future building phases.

## Policy DM16: Water pollution

| **Comment** | **Number of comments** |
| --- | --- |
| Support policy | 9 |
| Policy needs to be strengthened | 3 |
| Policy should have been set prior to current issues | 3 |
| Policy doesn't seem achievable considering developments proposed | 2 |
| Susceptibility of Nailbourne Little Stour catchment infrastructure to groundwater infiltration and sewer flooding | 2 |
| Inadequacy of wastewater handling leading to contamination of clean water courses | 2 |
| Tankers pumping sewage along Little Stour into Canterbury's WwTW | 2 |
| Newnham Valley and Dambridge WwTW have no facilities to strip or process phosphorous and effluent levels | 2 |
| Need for continued monitoring | 2 |
| Sufficient and reliable source of clean water is essential | 2 |
| WwTWs need to be operational, to the requisite service levels before Local Plan development commences | 2 |
| Multitude of on-site water treatment plants on various sites build by different developers will be challenging to monitor and regulate | 1 |
| Policy lacks detail on "new and improved wastewater treatment works" | 1 |
| Southern Water's Drainage and Wastewater Management Plan as mentioned in the IDP is not accessible from CCC website | 1 |
| No explanation as to why existing Sewage Treatment Plan cannot be expanded to cope | 1 |
| No explanation as to why another major Sewage Treatment Plan cannot be provided further downstream | 1 |
| Southern Water should no longer be permitted to operate | 1 |
| No evidence of Canterbury Nutrient Mitigation Plan - not available on CCC website | 1 |
| Passing responsibility to developers, they only care about cost | 1 |
| Critical that a fully developed wastewater treatment and recycling strategy is prepared | 1 |
| Plan focuses insufficiently on delivery of services to accompany sustainable development | 1 |
| Consultation bias towards property developers | 1 |
| Little consideration given to risk/benefit to rural communities versus Canterbury City Centre | 1 |
| New development should not compromise Water Framework Directive Objectives | 1 |
| Support proposal to enhance aquatic environments and ecosystems | 1 |
| Support requirement for risk assessments | 1 |
| Support development proposals on surface groundwater systems and mitigation | 1 |
| Support that agricultural development or changes in land use will also need to demonstrate how they are taking account of, and minimising, any harm to nitrate vulnerable zones | 1 |
| Development along EMC will affect the Lampen stream which feeds into the Stodmarsh RAMSAR site | 1 |
| Resources for new developments cannot be met | 1 |
| Climate change and flood risk are already putting homes at increasing risk of flooding | 1 |
| All councils should work together to make the River Stour clean again | 1 |
| Water companies don't have the capacity for all of these new developments | 1 |
| How will the policy be enforced over the lifetime of the development? | 1 |
| Insufficient water quality data being collected | 1 |
| Automatic digital quality metering should be installed along watercourses with water quality targets set out | 1 |
| Policy is not enough to protect against water pollution | 1 |
| Concerns about implementation | 1 |
| No new housing should be constructed until Canterbury's Wastewater Treatment works can be upgraded (2030) | 1 |
| Runoff and storm drainage also lead to release of untreated sewage excess as well as flooding | 1 |
| Nutrient credit' concept is disingenuous | 1 |
| Any new developments must include mitigation ponds with continued analysis of effective with financing and monitoring planned into the future with clear lines of responsibility and sanctions | 1 |
| Water pollution as an impact of housing | 1 |
| Local plan should be scrapped to protect habitats | 1 |
| Increased risk of flooding from rainwater run off and sewerage system overload arising from increase in housing and roads has not been assessed in the context of projected local climate change and rising sea levels | 1 |
| Standards for water quality have declined | 1 |
| Waste disposal systems needs to be improved | 1 |
| Proposals that cause deterioration of water quality must demonstrate that they will avoid, minimise and mitigate deterioration | 1 |
| Risk assessment of R1 on surface and groundwater systems is needed | 1 |

All of the representations made on this policy have been analysed and considered and no changes have been made.

## Policy DM17: Noise pollution and tranquillity

| **Comment** | **Number of comments** |
| --- | --- |
| Support policy | 12 |
| Designate specific areas of the District as Tranquil Zones, e.g. Old Park and Chequers Wood SSSI | 12 |
| Policy is weighed too heavily in favour of new developments | 4 |
| Insufficient consideration of existing residents | 4 |
| New developments should integrate noise insulation | 4 |
| Eastern Movement Corridor is planned through the tranquil countryside which contradicts policy DM17 | 3 |
| Extend scope of the policy to include odour and vibration | 1 |
| Require odour assessments in consultation with Southern Water | 1 |
| Insufficient outreach to rural communities | 1 |
| No risk/reward consideration to rural communities | 1 |
| Extend policy to include existing residents close to new developments | 1 |
| Enforcement policies to ensure action against noise complaints/ tougher enforcement needed | 1 |
| Include policy requiring consideration for wildlife when assessing noise impact | 1 |
| Not enough protection for residents within the city, against noise pollution | 1 |
| Some places should be left for the sake of people's mental health | 1 |
| Policy should include noise mitigation for residents and wildlife | 1 |
| Take into account the location of compressors for heat pump heating and cooling | 1 |
| Quiet areas are rare and need to be protected | 1 |
| Noise pollution from building of new developments will be significant | 1 |
| Encourage electric vehicles, they make much less noise | 1 |
| Increasing population in the city centre will increase noise pollution in urban areas with traffic and night time economy. Expand policy to include urban areas | 1 |
| Traffic resulting from fast food outlets should be addressed | 1 |
| What is the trigger for a noise risk assessment | 1 |
| Sections 3 & 4 are hollow commitments | 1 |

All of the representations made on this policy have been analysed and considered. The policy scope has been amended following the representations received, the policy now covers noise, odour and dust pollution. Requirements and guidance in relation to tranquillity can now be found under policy DS22. The policy has also been amended to ensure that noise mitigation is managed and maintained, and where the odour effects are assessed as significant, odour mitigation will also be required. The policy now requires Construction Environmental Management Plans to set out how noise, odour and dust, will be mitigated and managed throughout construction to minimise impacts of construction as per concerns raised throughout the representations received.

The potential impacts of noise pollution on wildlife and ecology are covered in the Open space, natural and historic environment section of Chapter 6: District-wide strategic policies such as Policy DS18.

## Policy DM18: Light pollution and dark skies

| **Comment** | **Number of comments** |
| --- | --- |
| Dark Sky zones should be designated and enforced e.g. Old Park and Chequers Wood SSSI | 13 |
| Support policy | 13 |
| Street lighting required to feel safe/ for security | 4 |
| Has to be a balance between residents safety and protecting wildlife | 3 |
| Proposed developments (including Eastern Movement Corridor) will be detrimental in terms of light pollution | 2 |
| Little consideration given to risk/reward for rural communities | 2 |
| Street lighting could be turned off during certain hours of the night | 2 |
| Do not allow more sports floodlighting | 1 |
| Dark skies species need protecting | 1 |
| The policy should build in some flexibility | 1 |
| Light designs for roads must meet KCC Highways Adoption Standards for lighting | 1 |
| Light pollution also comes from people's gardens and inside people's homes. Additional housing will not help | 1 |
| Policy should be extended across the district | 1 |
| Should include lighting temperature requirements | 1 |
| The Institute of Lighting Engineers as listed don't seem to exist | 1 |
| There should be greater emphasis on this policy | 1 |
| Reference 2(f) to include no adverse effects from PROWs | 1 |
| Policy rings hollow | 1 |

All of the representations made on this policy have been analysed and considered. The policy has been amended to ensure that whilst light pollution is minimised, that proposals must still adhere to the highway authority’s lighting requirements. Reference to the Landscape character and Biodiversity Appraisal has also been added into the policy, advising where to find the district’s designated areas of dark skies.

## Policy DM19: Contamination and unstable land

| **Comment** | **Number of comments** |
| --- | --- |
| Support policy | 2 |
| CCC not doing enough to protect against pollution and contamination | 1 |
| Eastern Movement Corridor risks the contamination of Lampen valley which feeds into Stodmarsh | 1 |
| Include surface and groundwater as potential receptors to contamination from development on land impacted by contamination | 1 |

All of the representations made on this policy have been analysed and considered. The supporting text of the policy has been amended to clarify that the policy recognises the environmental risks also associated with contamination and unstable land, and to add reference to landfill sites directly as an example of sites with likely contamination or land instability.

## Other comments

| **Comment** | **Number of comments** |
| --- | --- |
| Keep the rural landscape as it is and just build on brownfield sites | 2 |
| Permitted parking contradicts appendix 4 parking standards | 2 |
| No map or walking distance parameter for urban areas to outline centre, edge, or suburb | 1 |
| Include a map to show public transport accessibility | 1 |
| Note 4 should read table 7 but refers to table 8 | 1 |
| Parking parameters should have a lower threshold for Class E uses | 1 |
| Parameters for different accessibility/uran transect locations should reflect DS13 Movement Hierarchy | 1 |
| Retail users should provide for adapted cycle, childrens' and cargo bike parking | 1 |
| Sui generis uses - park and play areas must provide cycle parking | 1 |
| Vehicle storage of cycles should not be permitted unless hydraulic assist racking is provided | 1 |
| Few circumstances where new development would not be able to provide in-curtilage cycle parking. Should be built into building fabric | 1 |
| If on street hangers are provided, space for cargo bikes should be included | 1 |
| Supportive of sustainable drainage content throughout the local plan | 1 |
| Ensure sustainable development policies are retained in the Neighbourhood Plans | 1 |
| The local plan focuses too much on building houses rather than the delivery of services required to accompany | 1 |
| Consultation bias towards developers | 1 |
| Little consideration given to risk/reward to rural communities compared to urban residents | 1 |
| Consultation is inaccessible | 1 |
| Accompanying documents to the local plan are illegitimate | 1 |
| Put people and nature ahead of development | 1 |
| All policies should have measurable targets to make them enforceable | 1 |
| Full monitoring, and enforcement should be in place with set penalties and funding | 1 |
| Make it clear that policies are only applicable for new applications | 1 |
| Duplication and repetition across policies | 1 |
| Policies which require further evidence documents to ensure the local plan is justified | 1 |
| Expect Nationally Set Development Management policies in NPPF consultation to be adopted before submission of the Development Management policies in the local plan | 1 |

All of the representations made have been analysed and considered. The water hierarchy, initially included within policy DM14, has been moved to policy DS20 due to the requirement being strategic, integral that it is adhered to within all development.

The parking standards have sufficient flexibility within them to be able to be considered on a case by case basis.

Requirements for hydraulically assisted racks for cycle storage have been added.

Chapter 9 has been added to the draft Local Plan outlining the status of the draft Local Plan’s monitoring indicators. Chapter 9 contains a brief summary of what the indicators intend to monitor; however at this stage of the Local Plan process, we are still consulting on the best way to approach specific monitoring indicators.