**Draft Canterbury District Local Plan to 2045**

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

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## Policy DS1: Affordable housing

| **Comment** | **Number of comments** |
| --- | --- |
| Not affordable for locals or first time buyers | 20 |
| Term affordable needs defining | 19 |
| Social housing needed | 19 |
| Local needs not taken into account | 17 |
| Amount of affordable homes should be higher | 8 |
| Enforce that percentages of affordable housing are being met in developments | 7 |
| Must be affordable for those on the lowest incomes | 7 |
| Traffic needs consideration for new developments | 6 |
| Market based approach to affordable housing would be more beneficial | 6 |
| Strongly disagree with more student homes | 5 |
| Support 30% should be affordable housing | 5 |
| Build on brownfield sites | 4 |
| The plan needs to be flexible to respond to changes of circumstances of the period | 4 |
| Housing delivery needs to reflect the local housing need | 4 |
| Sewage and drainage need further consideration for new developments | 3 |
| Uni's should not be exempt from affordable housing | 3 |
| Proposals including affordable housing off site should be refused | 3 |
| Allow the affordable housing provider to choose between grouped or dispersed housing within developments | 3 |
| Support the flexibility of housing allocations | 3 |
| Further detail needed regarding viability evidence and cases in which offsite financial contributions will be accepted | 3 |
| Provision for the housing mix should be subject to viability considerations | 3 |
| Don't allow developers to go lower than the 30% affordable housing | 3 |
| No new houses, no ring roads | 2 |
| Enforce dispersing of affordable homes or remove it, Thanington affordable homes are grouped | 2 |
| Concern that building on green belts and farm lands are joining villages together | 2 |
| Adopt a definition that suits affordability for local people | 2 |
| Plan should reflect the housing needs assessment | 2 |
| Affordable tenure is not deliverable across small/medium developments | 2 |
| Data on the Local Housing Need needs updating | 2 |
| The council should build housing on its own brownfield sites | 2 |
| Concerned about proposed housing mixed to be delivered on first homes | 2 |
| Developers should be encourage to build cheaper smaller properties for local first time buyers | 2 |
| Need for social housing for local people | 2 |
| Offsite contributions should be allowed for self and custom build homes | 1 |
| Adopt Development Management policies in current NPPF consultation | 1 |
| Requesting need for offsite contributions and encourage access to outdoors leisure | 1 |
| Other costs linked to biodiversity net gain should be taken into account | 1 |
| Canterbury is overpopulated | 1 |
| Review affordable homes requirement | 1 |
| Should adopt a differential rate between brownfield and greenfield sites | 1 |
| First refusal of homes offered to locals | 1 |
| Affordable, sustainable housing in AONB | 1 |
| Regulations should be in place to protect old park wood | 1 |
| Too much focus on building houses | 1 |
| Bias towards property developers | 1 |
| Oppose the solar farm development in 6.3.1 | 1 |
| Enforcement on second homes | 1 |
| Support dispersing of housing groups to promote mixed communities | 1 |
| Support Uni's being exempt from affordable housing requirement | 1 |
| Vote out the council | 1 |
| No plan proposed should go over ONS data for population | 1 |
| Put affordable housing where buildings already exists | 1 |
| Regain Canterbury City Football Club and local developments | 1 |
| Evidence needed to show this plan is deliverable | 1 |
| Don't let landlords buy affordable homes and rent them out | 1 |
| Student homes should be converted into non student if empty | 1 |
| All developers to install EV charging points | 1 |
| Remove first home discount unless evidence given | 1 |
| Reduce the amount of sheltered housing | 1 |
| New hospital needed for all the new homes | 1 |
| Allow for offsite flexibility for affordable homes | 1 |
| Use empty and disused building for homes, encourage growing own food and sustainability | 1 |
| Should have a Canterbury Rent, no higher than 30% of the lowest earners | 1 |
| High quality cycle storage should be applied to DS1 | 1 |
| Affordable rent levels are unaffordable for the majority | 1 |
| Quality of housing is not defined, who decides this? | 1 |
| 30% affordable housing should be on all sites, not just those that qualify | 1 |
| Policies and assumptions made on older persons accommodation needs to be re assessed | 1 |
| Minimum of 10% for professional fees on build costs | 1 |
| Unclear the amount of communal floor space in the LPVS | 1 |
| Flexibility needed in approach for first homes | 1 |
| The clustering of affordable and social doesn't allow for clear estimations over the years of the plan | 1 |
| Only 20% of the proposed homes would be affordable, not the planned 25% | 1 |
| Affordable must still be high quality | 1 |
| Site specific approach for housing mix should be considered | 1 |
| Approach CHAC or Citizens Advice for evidence on housing need | 1 |
| Current policy is not supportive of those on lowest incomes, doesn't allow for diverse communities in urban areas | 1 |
| Concern developers will go for high end sites that are not affordable | 1 |
| Student accommodation doesn't support the needs of local residents | 1 |
| Needs of the most vulnerable have to be met | 1 |
| Do not sacrifice green field sites | 1 |
| Only affordable housing to be built | 1 |
| Support the use of vacant buildings | 1 |
| Affordable housing tenures should be flexible to match the council housing strategy | 1 |
| All policy requirements should be compulsorily added to costs and land values determined by the residual profit. | 1 |
| Need a clear definition on 'affordable housing' | 1 |

All of the representations made on this policy have been analysed and considered, including those made in relation to evidence documents such as the Viability Study and the council’s Housing and Homelessness Strategy. While different views have been put forward on the quantity of affordable housing being sought on developments having considered the evidence documents, including the Viability Study, the council concludes that 30% is still appropriate.

In terms of the affordability of affordable housing, the government sets the local affordable rent for the district and it is not within the council’s or the Local Plan’s ability to change or identify an alternative rate. Appendix 1: Glossary of the draft Local Plan defines affordable housing and the different affordable products, in line with the NPPF.

Clarification has been added to the policies supporting text setting out that affordable housing should be dispersed within developments to create a cohesive community, having regard to registered providers identified needs so that the affordable housing is a manageable product.

Point 5 of the policy has also been amended, in light of comments, to provide greater clarity about when offsite financial contributions may be considered. Linked to offsite financial contributions, supporting text has been added to reiterate the council’s policy for aiming to spend the money locally to the development, including within the Kent Downs AONB.

## Policy DS2: Housing mix

| **Comment** | **Number of comments** |
| --- | --- |
| Build houses to meet the local needs | 19 |
| Flexibility for developers on housing mix to match the housing need | 14 |
| Need more social housing | 7 |
| Plan will need updating before 2024 | 7 |
| No new large homes in rural, build small 2/3 bed for first time buyers | 6 |
| Needs of older people can be met without delivery of bungalows | 6 |
| No more houses until improvements to infrastructure are made | 5 |
| Site specific for housing mix, not a blanket approach | 4 |
| Houses are not affordable for local people | 4 |
| Provide a range of housing mix for various needs | 4 |
| Specialist forms of development such as specialist older persons or student housing are not subject to the requirements of this policy. | 4 |
| Older person accommodation needs to be clearly thought through | 4 |
| Delivery of first time homes would be difficult for developers | 4 |
| Consider if it is feasible for self build plots on large estates | 4 |
| Self-build homes should be on smaller plots, not large developments | 4 |
| Make homes affordable for local people | 3 |
| Renovate existing empty homes | 3 |
| Amend to suit the needs of older persons, not housing type | 3 |
| Viability of first home discount to be looked at | 3 |
| Policy must match the housing strategy | 3 |
| Older persons and disabled homes seems to be a duplicated need | 3 |
| Leave rural landscape, build on brownfield | 2 |
| Small developments in Rural villages should be part of the housing mix | 2 |
| Reset the target figure based on councils own report and needs | 2 |
| Provide housing for local need | 2 |
| Policy needs flexibility on housing mix | 2 |
| Expensive homes in coastal towns will lead to more commuter traffic | 1 |
| Significant penalties for developers who fail to keep to DS2 | 1 |
| Bias towards developers and not local communities | 1 |
| Rural communities have not been considered | 1 |
| Accompanying documents to the core local plan are illegitimate | 1 |
| Too many 4 bedroom houses | 1 |
| Why North/South divide? | 1 |
| Plan is bias towards developers | 1 |
| Targets must be enforced and across all housing sites | 1 |
| Larger developments to include co-housing | 1 |
| Provide high quality, sustainable housing for everyone | 1 |
| Provide social housing for homeless people | 1 |
| Population growth over ONS estimates is concerning | 1 |
| Housing mix is not supported by the data in the housing needs assessment | 1 |
| Too many houses planned | 1 |
| Support, there should be a good mix all of different size homes | 1 |
| Encourage council tenants to downsize when they are under occupied | 1 |
| Establish a rent for key workers on new homes | 1 |
| Mandatory quotas for self build housing sites | 1 |
| More emergency accommodation for homeless | 1 |
| Council to quantify the needs for self build homes | 1 |
| Council should designate 5% of self build plots on developments over 200 homes | 1 |
| 10% buffer for each dwelling type will be realistic | 1 |
| Use local figures for Disability Living Allowance, not national ones | 1 |
| Don't place self build responsibility on developers | 1 |
| Smaller plots are needed for self build homes, not large developments | 1 |
| Character and green belts of Canterbury will be destroyed by housing | 1 |
| Policy needed on homeless housing | 1 |
| More hostel and emergency accommodation needed | 1 |
| Increase construction of bungalows | 1 |
| Issue with delivering that many 3, 4 bed affordable homes | 1 |

All of the representations made on this policy have been analysed and considered.

*Policy DS2: Housing mix* aims to ensure housing is provided to meet the needs of the district based on the council’s Housing Needs Assessment (2021, 2024). Having analysed and considered all of the representations made on this policy and up to date evidence documents several changes have been made and outlined below.

The Housing Needs Assessment (2024) provides a focussed update taking into consideration the 2021 census data. As such, the bedroom mixes set out in point 2 for market housing and point 3 for affordable housing have been updated to those set out in the 2024 Housing Needs Assessment.

Point 5 has been changed to provide for the needs of different groups within the community, as such it is proposed that bungalow provision is considered alongside the accessibility requirements for proposals for 10 or more dwellings. In addition, the policy has been strengthened to protect these bungalows by requiring a condition on any planning applications to remove the permitted development rights relating to upwards extension.

In response to representations made, the council also proposes the inclusion of Point 6 and 7 to address the housing mix requirements for older persons housing, student accommodation, gypsy and traveller accommodation, and self and custom built housing.

## Policy DS3: Estate regeneration

| **Comment** | **Number of comments** |
| --- | --- |
| Prioritise achieving net zero on future and current homes | 6 |
| Where will money come from? | 3 |
| Show the difference in social housing and affordable housing | 3 |
| Only build on brownfield | 2 |
| No new ring road | 2 |
| Reduce building on greenfield to help reduce local flooding risks | 2 |
| More social housing needed | 2 |
| Agree to improve old structures | 2 |
| Agree with policies | 2 |
| Regeneration is environmentally positive | 1 |
| Keep rural landscape as it is | 1 |
| Agree to make existing homes more energy efficient | 1 |
| Make housing affordable for the local people, match to wages | 1 |
| Support proposals | 1 |
| Clarify difference in plan for local and student housing | 1 |
| Bias towards developers | 1 |
| Little consideration for rural communities | 1 |
| Opposed to solar farm development | 1 |
| More action less words | 1 |
| Building ghettos | 1 |
| All developers of projects in excess of 10 houses should be required to fund the full cost of meeting the 41% need | 1 |
| Suitable infrastructure to be built | 1 |
| Avoid gentrification | 1 |
| Create plan for electric public transport | 1 |
| Need more EV charging points | 1 |
| Policy needs rewording or removing | 1 |
| Reference needed to creating outdoor health and leisure provisions | 1 |
| It is not the role of Local Plan to provide council policy on housing stock | 1 |

All of the representations made on this policy have been analysed and considered.

The policy was broadly supported but some detail has been added in the supporting text for clarity including: reference to the emerging Housing Strategy which will set out plans to improve social housing stock in the district; and reference to retrofitting and redevelopment for increased clarity on how ‘regeneration’ can be interpreted.

## Policy DS4: Rural housing

| **Comment** | **Number of comments** |
| --- | --- |
| Policy needs careful management and enforcement | 5 |
| New rural homes should be in keeping with the village | 4 |
| Keep rural landscape | 3 |
| Combining rural and entry level exception sites breaks NPPF rules | 3 |
| Affordable housing needs to match local wages | 3 |
| Restrict people from turning small outbuildings into large new homes | 3 |
| No new houses | 2 |
| Infrastructure improvement needed before new homes | 2 |
| Little consideration given to rural communities | 2 |
| The number of proposed houses would completely change the landscape around Canterbury | 2 |
| Care for the wildlife, environment and sustainability needs to be taken into account | 2 |
| Agree as policy is realistic | 1 |
| Build only on brownfield sites | 1 |
| Neighbourhood plans should be encouraged | 1 |
| Need for social housing | 1 |
| Allow small builds in rural locations | 1 |
| Buildings only to be used by agriculture workers | 1 |
| SuDs should be included for all new rural dwellings | 1 |
| Policy needs to be monitored and sanctions for non compliance | 1 |
| Who determines the need for housing | 1 |
| Agree to reusing existing dwellings | 1 |
| Further research needed as housing demand has changed | 1 |
| New housing will cause loss of habitats | 1 |
| Policy should consider landscape guidance | 1 |
| Only permit new rural accommodation where this is necessary need | 1 |
| Sustainable transport should include equestrian | 1 |
| Need to consider seasonal workers accommodation | 1 |
| Who will judge what is 'truly outstanding'? | 1 |
| Constraints on how long accommodation is used by seasonal workers | 1 |
| Disagree with building on green belts and expanding villages | 1 |
| Extrapolated out between rural exception and entry level exception to reflect national planning policy | 1 |
| Entry level exception should be supported by local housing need survey | 1 |

All of the representations made on this policy have been analysed and considered. The order of the wording of some of the policy has been amended to ensure that the policy is clear.

The policy has been amended to include community-led exception sites in light of the revised NPPF published in December of 2023.

## Policy DS5: Specialist housing provision

| **Comment** | **Number of comments** |
| --- | --- |
| No more student accommodation | 9 |
| Build more 65+ accommodation | 5 |
| Support housing for local needs | 4 |
| Priority to conserve and enhance the natural landscape | 3 |
| Set a policy for number of older persons homes needed | 3 |
| Allocate specific sites for older persons accommodation | 3 |
| Build on brownsites | 2 |
| Need to enforce policy and uphold actions | 2 |
| Doesn't comply with NPPF | 2 |
| Plan older persons accommodation near local shops and bus routes | 2 |
| Don’t undermine local hotel and b&bs | 2 |
| Purpose built student accommodation should have an onsite manager | 2 |
| Sensible suggestions | 1 |
| No new houses | 1 |
| Too much focus on building houses | 1 |
| Provision needs to be broadened and include other vulnerable groups | 1 |
| Self build should include a mix of property sizes | 1 |
| Tenancies for private renters living in build to rent schemes should be for a minimum one year period. | 1 |
| Other housing in the town centre needs to be prioritised, not students | 1 |
| Make an exemption to prove there is a need for older persons accommodation | 1 |
| Reconsider the anti car position | 1 |
| Should be provision for homes with disabled access | 1 |
| Reduce sheltered housing provision | 1 |
| More thought for adults with learning difficulties and mental health issues | 1 |
| Preferable rates for local people to buy housing | 1 |
| Define the terms gypsy and traveller | 1 |
| Define car free scheme | 1 |
| Remove policy for site to be within a settlement boundary | 1 |

All of the representations made on this policy have been analysed and considered. While many respondents commented that there should be no more student accommodation or that there should be more older person accommodation or 65+ accommodation provided, *Policy DS5: Specialist housing provision* does not seek to allocate sites. Rather, based on the needs assessments set out in the the Housing Need Assessment (2021, 2024), and the Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) (2024), the policy provides a framework for assessment should an application be submitted for any of these uses so that we appropriately support the needs of different communities within the district. No sites are allocated for student accommodation in the draft Local Plan, and the provision of a proportion of housing as older persons housing is a requirement of all developments 300 or more dwellings in *Policy DS2: Housing mix*.

The key changes to the policy are in response to the GTAA (2024). A point has been included which identifies the circumstances where the loss of gypsy and traveller accommodation would be acceptable. This is in response to the level of need identified within the Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2024).

Based on recommendations in the GTAA, specific reference to land being used for Travelling Showpeople purposes has been included within Point 8. This includes additional requirements for this specific land use (8)(h) and (8)(i).

## Policy DS6: Sustainable design

| **Comment** | **Number of comments** |
| --- | --- |
| Need a requirement for solar panels and EV charging | 14 |
| No evidence given on deliverability of net zero | 7 |
| Building regulations should make sure developers are compliant with water sustainability | 6 |
| Any requirements should be inline with government targets | 6 |
| Support water sustainability, without this it will be hard to achieve water savings pp | 5 |
| Agree with requirements for eco-friendly designs | 4 |
| Development must incorporate energy generation, solar, wind, heat pumps | 4 |
| Large developments need to include water infrastructure | 4 |
| A higher threshold needed to allow smaller sites to be built | 4 |
| All new development should have EV charging points | 3 |
| Green social spaces are needed | 3 |
| Focus too much on building houses and not on infrastructure | 3 |
| Insistence on latest energy efficiency and communication technology | 3 |
| Install mechanisms so the policy is enforced | 3 |
| SAP and BREEAM are not suitable standards | 3 |
| Developers need to install grey water recycling | 3 |
| Is the housing goal feasible on a large scale | 2 |
| Flexibility to ensure density is appropriate to the site | 2 |
| Need to enforce the design standards | 2 |
| Ensure housing developments meet a standard | 2 |
| Keep rural landscape the way it is | 2 |
| Allow for better cycling and footpaths | 2 |
| Design heatings that avoids drawing on fossil fuels | 2 |
| Bias towards developers | 2 |
| Reduce hard surface areas to allow for water drainage | 2 |
| Ensure the requirements are feasible | 2 |
| Ensure building regulations are improved and move towards net zero | 2 |
| We should insist on Passivhaus standard | 2 |
| Need compulsory water recycling schemes | 2 |
| Clarity on who is responsible for maintenance of pathways | 2 |
| Requirement for local sewage plans | 2 |
| Encourage heat pump installations | 2 |
| Support low density housing statement | 2 |
| Should include low carbon construction methods | 2 |
| Remove opt outs for developers | 2 |
| Proposed DPH levels are too high | 2 |
| Little consideration given to space for gardens, growing vegetables | 1 |
| National grid land rights must be obeyed | 1 |
| Support the commitment to water efficiency | 1 |
| The statutory safety for electricity must not be infringed | 1 |
| Be aware that overhead electricity lines must remain in place | 1 |
| Suggested audit to be done to see if the current LP has been achieved | 1 |
| Policy points 1,5,6 and 7 need strengthening | 1 |
| Need to have a target to reduce emissions on existing housing stock | 1 |
| Don't build houses with gas, oil or wood burners | 1 |
| No prescriptive requirement given for grey water recycling | 1 |
| Higher densities should not equate to poor quality housing | 1 |
| Net zero operational requirements are vital | 1 |
| Essential to protect BMV land | 1 |
| Apply a threshold approach to over 100 new homes | 1 |
| Sustainable standards should be mandatory | 1 |
| Sustainable design is a fad and not based on science | 1 |
| Build for housing need | 1 |
| Stop messing with carbon | 1 |
| Timber-framed buildings should have sprinkler systems | 1 |
| Car use is influenced by development density | 1 |
| Concentrate residents development where 100 dwellings can be achieved | 1 |
| Design needs to be highest possible environmental design | 1 |
| CCC are unable to deliver this plan | 1 |
| Don't split communities by installing busy roads | 1 |
| Item 7 needs amending to include design and access statement | 1 |
| Delete paragraph 1a and strictly adhere to 1a | 1 |
| Little consideration for rural communities | 1 |
| Support commitment to sustainable design | 1 |
| Local plan is not sustainable | 1 |
| The standard should be zero carbon to net zero | 1 |
| Doesn't prepare homes for renewable energy provision | 1 |
| No details on what cost would apply for carbon price | 1 |
| Safe should also include safety of people moving around developments | 1 |
| Wording needs to be changed for instances when net zero cannot be met | 1 |
| Design Review Panel should include top architects | 1 |
| How will footpaths and wildlife corridors be designed | 1 |
| Add reuse of existing buildings | 1 |
| Creating sustainable communities needs to be a priority | 1 |
| Implement zero carbon emissions for all new builds now | 1 |
| Reduce embodied as well as operational emissions | 1 |
| Adaptation needed for extreme climate change scenarios | 1 |
| No definition to what constitutes major development | 1 |
| Follow the Building with Nature standards | 1 |
| Build more affordable housing for young people | 1 |
| Include energy saving building standards | 1 |
| Make all council housing meet energy efficiency standards | 1 |
| Higher standards on smaller sites | 1 |
| Future proof recycling for the district | 1 |
| Cannot be too descriptive on designs of sites | 1 |
| Set the cost per tonne of carbon to be paid to the Reduction Fund is the required standard is not met | 1 |
| Suggestion to remove net carbon emissions from this policy | 1 |
| Flexibility to be included within the policy | 1 |
| Costs for the policy have been underestimated | 1 |
| Not necessary for all developments to undertake a HIA | 1 |
| Evidence needed for consumption of water pp per day | 1 |
| Concerned that more greenfield land will be taken | 1 |
| Ensure existing homes are energy efficient | 1 |
| Policy must include heat pumps | 1 |
| Give developers time to adjust to new regulations | 1 |
| Disagree with putting network coverage upgrades on developers | 1 |
| Flexibility needed on a site by site basis | 1 |
| Define terms in garden city principles | 1 |
| Garden city principles are not appropriate to the modern world | 1 |
| Suggestion for amendments to be made in accordant to Quinns Development Management rep | 1 |
| More evidence needed on the water usage pp | 1 |
| Policy strand to be added covering a coordinated approach to development respecting existing site constraints | 1 |

All the representations made on this policy have been analysed and considered. A new Sustainable Design Guide SPD has been developed for consultation alongside the new draft local plan, which will support applicants to get to net zero for all new residential and commercial developments. Higher standards have also been proposed for other types of development. The guide will ensure applicants consider all areas of sustainable intervention, such as EV charging, solar panels, water efficiency, energy efficiency and so on. The SPD also includes a section around waste and transportation, looking at the infrastructure as well as the building itself.

Applicants will be required to submit a Sustainable Design Statement with their application. Within the SPD, the council has developed a chapter called ‘What to submit with your Planning Application’, which acts as a checklist for applicants to ensure compliance with Policy DS6. It will also streamline the internal process for reviewing planning applications and ensure all required evidence is provided at the appropriate stage.

The council has procured feasibility work in relation to the cost of implementing net zero development in the viability evidence document. It has been demonstrated that getting to net zero is viable using typologies for different types of development. The council has also undertaken research in relation to the cost of carbon offsetting in the evidence document Canterbury City Council Carbon Offset Review.

Policy wording for DS6 - Sustainable Design has been reviewed and amended to link to the Sustainable Design Guide SPD. Representations have also been taken into consideration to inform the development of the Sustainable Design Guide SPD.

## Policy DS7: Infrastructure delivery

| **Comment** | **Number of comments** |
| --- | --- |
| CCC should hold developers to account that don't comply with policies | 5 |
| Detailed plans and timescales to be included | 4 |
| Disagree with use of Rough Common Rd for a ring road | 4 |
| Other authorities need to be involved to enforce infrastructure improvements | 3 |
| 15 minutes cycle and walking is not realistic | 3 |
| Ensure that cycle and walking paths are accessible | 3 |
| Don't allow developers to opt out | 3 |
| Make infrastructure improvements before developments approved | 3 |
| Council to continually accept viability assessments | 3 |
| DS7 point three needs detailing | 2 |
| Prioritise infrastructure development | 2 |
| Timetable and delivery of budgets needed | 2 |
| Hold developers to account | 2 |
| Waste water infrastructure needed | 2 |
| Timeline and plan to regenerate local health care is needed | 2 |
| Approve of DS7 | 2 |
| Policy lacks substance and commitment | 2 |
| Water infrastructure needs to be referenced in DS7 | 2 |
| Policy is not realistic, include car as option for travel instead of walking and cycling | 2 |
| No plan should be included without a clear budget | 2 |
| Clarity on expected cost for developers needed | 2 |
| Costs need to be taken into consideration | 1 |
| Policy threatens affordable housing plans | 1 |
| The approach is flawed | 1 |
| Until developments are finished you won't know if infrastructure is sufficient | 1 |
| Abandon ring road project | 1 |
| Resident lack confidence in council policy | 1 |
| Include pathway connected Aylesham and Barham crossroads | 1 |
| European systems wont work in Canterbury | 1 |
| Don't redirect the problem | 1 |
| Suggest funding is put towards cycle and pedestrian improvements | 1 |
| Policy excludes contributions to existing social infrastructure projects | 1 |
| Additional funding needed for All Saints Church project | 1 |
| There is no delivery programme included | 1 |
| Existing developments should also be considered | 1 |
| Infrastructure assessments to be carried out by council officers after development finished | 1 |
| Add additional wording for developments that avoid infrastructure improvements | 1 |
| Infrastructure plan should be sorted before any growth plans | 1 |
| Improvements need to be made to road infrastructure | 1 |
| Do not approve unsustainable development | 1 |
| CIL funds are insufficient | 1 |
| No confidence in the council or developers | 1 |
| Paragraph 8 needs to be strengthened | 1 |
| Improve current infrastructure | 1 |
| Support flexibility in policy for developers | 1 |
| Infrastructure needs improving everywhere not just on development sites | 1 |
| Policy is just for developers to generate revenue | 1 |
| Sewage infrastructure should be specifically mentioned | 1 |
| Concern of practicalities and effectiveness of utilities | 1 |
| The plan should exclude cost based feasibility but accept spatial constraints | 1 |
| Policy is not feasible | 1 |
| Need agreement on required schemes for mitigation | 1 |
| Wording on section 8 is too prescriptive | 1 |
| Amend part three to include slopes and hills in calculations | 1 |
| Appropriate located community infrastructure is more important than roads | 1 |
| Clarity needed on off-site community infrastructure | 1 |
| Concerned providers can't deliver on infrastructure | 1 |

All the representations made on this policy have been analysed and considered. Point 3 of the policy has been amended to make it clear that s106 contributions will be sought towards strategic infrastructure measures, in addition to CIL contributions, to help ensure that necessary funding will be secured through development to deliver the required infrastructure improvements.

Point 7 has also been amended to make it clear that sewerage infrastructure is a type of utilities infrastructure, and point 8 has been amended to clarify that a final review of any viability evidence would be required prior to the completion of a development to tighten the wording and avoid on-going reassessment.

## Policy DS8: Business and employment areas

| **Comment** | **Number of comments** |
| --- | --- |
| Include Wincheap | 4 |
| Lack to attract major employers to the area | 2 |
| Policy contradicts HB10 | 2 |
| Canterbury Business Park is the highest performing site | 1 |
| Wording of the policy restricts development on land | 1 |
| Thanet Way site should be acknowledged | 1 |
| Create more opportunities for education and health care employment | 1 |
| Happy with DS7 | 1 |
| No specific delivery plan given | 1 |
| Energy performance requirements need to be considered | 1 |
| Need advantageous terms to attract new businesses to the area | 1 |
| Need more proposals for public transport | 1 |
| Employees would have to travel to sites which means more congestion | 1 |
| No employment opportunities in the district | 1 |
| Further evidence needed on employment | 1 |
| Reflect where growth is taking place | 1 |
| Overemphasis on economic development | 1 |
| Concentrate more on improving the environment | 1 |
| Ensure industrial sites have green areas | 1 |
| Opportunities for employment available in new build areas | 1 |
| Include Chartham Paper Mill site | 1 |
| All or nothing approach is not sympathetic to mixed use redevelopment | 1 |
| Need a proactive approach | 1 |
| Criteria on supporting home based businesses | 1 |
| Extend point 6 | 1 |
| Include vehicle access and drainage/sewage on estates | 1 |
| Include no additional disturbance to neighbours | 1 |
| Include no additional risk to flooding | 1 |
| Review provision close to Adisham development | 1 |
| Make new policy for self-employed | 1 |
| Create more high profile jobs in the area | 1 |
| Build a high standard business park with links to road and rail | 1 |
| No new sites proposed? | 1 |
| Define high quality office space | 1 |
| Fibre broadband upgrades needed | 1 |
| Policy limits sites to deliver other development needs | 1 |
| Employment floorspace figures to be revisited | 1 |
| New employment space is unrealistic for delivery | 1 |
| Need a robust review of current employment land | 1 |
| Policy is over prescriptive and complex | 1 |
| Include Altira Park | 1 |
| Requirement to demonstrate need is unnecessary | 1 |
| Criterion 5b doesn't reflect national policy | 1 |
| Conflicts with NPPF | 1 |

All the representations made on this policy have been analysed and considered. Reference has been added to advise as to where the designated Business and Employment Areas can be located. The previous point 8 within policy DS8, referring to energy efficiency design, was moved to policy DS6 ‘Sustainable Design’ and can now be seen under point 2 of DS6.

## Policy DS9: Education and associated development

| **Comment** | **Number of comments** |
| --- | --- |
| UKC southern slope to be protected | 4 |
| Stop more student infrastructure and accommodation | 3 |
| More accommodation for students is unsustainable | 2 |
| How will you support the universities | 1 |
| Concern that students numbers are dropping which will affect economy | 1 |
| Plan fails to consider the economy in 2050 | 1 |
| Rate of growth of the universities is too much for the city | 1 |
| Have cheaper space for businesses to use | 1 |
| Disagree for new hotel | 1 |
| Policy doesn't include viability of non urban locations | 1 |
| Don't lose any green space | 1 |
| Any proposal for UKC should respect the masterplan | 1 |
| Support proposal for new hotel | 1 |
| Do no bring back e-scooters | 1 |
| Sufficient car parking should be made available | 1 |
| UCA aspiration to improve walk and cycle links | 1 |
| UCA change entrance to St Augustine | 1 |
| Buildings to be carbon neutral | 1 |
| Need to revise to include both schools and FE college | 1 |

All the representations made on this policy have been analysed and considered. The policy has been amended to support the improved access and pedestrian and cycle connectivity to the University of Creative Arts. The supporting text has also been amended to ensure that it is clear that the policy applies to all levels of education and not just development of education at a university level. Following the feedback received in the representations, the locational preference for educational development and justification for this, has also been added to the supporting text for this policy to add clarity to clause 4 on what can be considered a “suitable location” for educational development. The importance of development in local skills through education has also been recognised within the supporting text for this policy, making reference to the Local Skills Improvement Plan.

## Policy DS10: Town centres and community facilities

| **Comment** | **Number of comments** |
| --- | --- |
| Community Facilities are vital and should be accessible | 2 |
| Canterbury shop rents are too high | 2 |
| Encourage accommodation above shops | 2 |
| What criteria would be needed to permit competitive commercial development out of city centre | 1 |
| Support to create more health care provision | 1 |
| Need to consider how town centres can be supported by community facilities | 1 |
| Disagree to reduce the town centre boundary | 1 |
| Improvements to be made to Local Centre at Hawe Farm Way | 1 |
| Need to revitalise town centres | 1 |
| Consultations should be held with BID | 1 |
| Don't give permission for out of town developments | 1 |
| Disagree with ring road | 1 |
| Attract more GPs to work in the area | 1 |
| Need to include local health care provision | 1 |
| Canterbury is a eyesore | 1 |
| Licensing hours should be capped | 1 |
| The plan is bias towards town centres | 1 |
| Need play provision in city centre | 1 |
| Add St Stephens to list of local centres | 1 |
| No longer enjoy visiting Canterbury | 1 |
| Residents are feeling pushed out of the city | 1 |
| Shop fronts are ugly | 1 |
| Sounds laudable but am sceptical | 1 |
| Protection of town centres are weak | 1 |
| Revise definition of community facilities | 1 |
| Work needed to restore older buildings | 1 |
| Hoath should be included | 1 |
| Public transport needs improving | 1 |
| Town centres should keep pace with developments | 1 |
| Parking is too expensive | 1 |
| Chartham should not be designated as both categories | 1 |
| Criteria 5 requires consultation and local need | 1 |
| Provide a clear guidance on the circulation plan | 1 |
| Town centres and communities facilities need to be separated | 1 |
| Further evidence needed on online sales effect | 1 |
| Hierarchy needs updating with South Canterbury, Sturry/Broad Oak and Cockering Farm | 1 |
| Conflicts with NPPF | 1 |
| Request specific reference to deliver sustainable access | 1 |
| Restricts planning permission for development including loss of medical care | 1 |
| Flexibility needed in the NHS estate | 1 |
| Should support local health care facilities | 1 |
| Long terms plans should embrace the cathedral | 1 |
| Incorporate cathedral into town centre boundary | 1 |

All of the representations made on this policy have been analysed and considered.

A number of points have been added to the policy:

Point 3a has been added which states that proposals for main town centre uses outside identified centre boundaries will be supported if there are no more suitably located, better connected and available sites, using a sequential approach to site identification. This will ensure that town centre uses are consolidated and remain accessible in line with the recommendations of the Retail and Leisure Study (2020,2022).

Removal of “where there is a demonstrable local need for the proposal” from point 7 following representations from Canterbury BID. This is also in line with NPPF guidance.

Addition of Point 8 which states that proposals for major residential development will be expected to contribute to the improvement of local community halls where a new facility is not being provided within the site.

Additional text in Point 9. The policy now states that disposal of a medical, health or social care site will only be supported if it is identified within an approved NHS strategy.

## Policy DS11: Tourism development

| **Comment** | **Number of comments** |
| --- | --- |
| Support proposal to limit housing as holiday homes | 4 |
| Traffic zones will put tourists off | 4 |
| Good public transport is needed | 2 |
| Support more hotel accommodation | 2 |
| Define oversaturation in short term accommodation | 2 |
| Transport policies will put tourists off | 1 |
| Need more tourist attractions | 1 |
| Support the need to protect existing heritage | 1 |
| Agree with policy DS11 | 1 |
| Provide good equestrian routes | 1 |
| Need a delivery plan | 1 |
| Herne Bay should be prioritised | 1 |
| CCC do not support tourism | 1 |
| Support reducing holiday lets | 1 |
| Local needs have to be priority | 1 |
| Marina provision is not practical in our district | 1 |
| Support proposal for Marina provision | 1 |
| Create a leisure destination at Broad Oak reservoir | 1 |
| Housing developments putting off tourists | 1 |
| Request additional criteria within AONB protection of rural character and reduce adverse impacts | 1 |
| Area is in gridlock due to over populated | 1 |
| Reduce congestion | 1 |
| Need to mention that Canterbury is a UNESCO world heritage site | 1 |
| Promote education tourism and stop groups having to show passports | 1 |
| More focus on attracting longer stays rather than day trippers | 1 |
| More hotels in Herne Bay needed | 1 |
| Tourist don't want to visit Canterbury | 1 |
| Priorities creating an attractive greener and cleaner environment | 1 |
| Changes to passports needed to encourage EU tourism | 1 |
| Limit second homes, short term rentals and HMO's to create more housing stock | 1 |
| Reopen Poor Priest Hospital as a museum | 1 |
| Place stricter rules on holiday lets | 1 |
| Disagree with Merton Park housing | 1 |
| Pilgrimage needs to be included | 1 |
| Can DS11 and R28 be linked | 1 |
| Strongly object to omit those properties that are already holiday lets | 1 |
| Adaptive reuse of existing buildings should gain precedence over new structure | 1 |
| Disconnect in policy and results of Economic Development and Tourism survey | 1 |
| Planning need to regulate how many short term lets there are | 1 |
| No mention of Reculver Master Plan | 1 |
| New tourist development should support existing resident areas | 1 |
| Concern of increased traffic | 1 |
| Concerned that using student accommodation for tourists will affect local hotels | 1 |
| Suggestion for 90 day period to be reduced to 30 days | 1 |
| Promote long terms lets to those with second properties | 1 |
| PRoW network need to be referenced | 1 |

All the representations made on this policy have been analysed and considered. The policy was broadly supported. Point 3e has been added to the policy which states that tourism development in the countryside must also comply with policy R28.

## Policy DS12: Rural economy

| **Comment** | **Number of comments** |
| --- | --- |
| Protect rural communities | 5 |
| Rural economy is vital to district | 3 |
| Do not build on farm land considering uncertainty in national food supplies | 2 |
| This plan does not protect the rural landscape | 2 |
| Policy is inconsistent with R14 - R16 | 2 |
| Agricultural land is being used for development | 2 |
| Strengthen language used | 2 |
| Well location, strategic location in rural areas play role in delivering spatial strategy | 1 |
| Flexibility in the policy to sustain level of diversification | 1 |
| Create an increase in business opportunities for livery yards | 1 |
| Protecting BMV land is essential | 1 |
| There are no constraints for other industries mentioned | 1 |
| Don't forget about character and heritage in developments | 1 |
| Conflicts with allocation of large areas for housing development | 1 |
| Too much focus on building houses | 1 |
| Farmers getting rich selling their land | 1 |
| Need to be aware where improvement becomes development | 1 |
| More money for roads is not needed if aim is to reduce traffic | 1 |
| Policy highlight the need for groundwater quality | 1 |
| Concern there will be no more farmland | 1 |
| Preserve linked rural landscapes | 1 |
| Any developments need to be supported by Agricultural Land Classification Assessment | 1 |
| No proposal have proportionals amounts of housing land | 1 |
| Clause 3 conflicts NPPF | 1 |
| CCC has no interest in rural environment | 1 |
| Welcome inclusion of equestrian considerations | 1 |
| Request specific reference to PRoW | 1 |

All of the representations made on this policy have been analysed and considered. No amendments were required for this policy.

## Policy DS13: Movement hierarchy

| **Comment** | **Number of comments** |
| --- | --- |
| Better public transport needed | 21 |
| Provision made for those that can't walk or cycle | 12 |
| High quality walking and cycling routes needed | 6 |
| Fully support the plan | 6 |
| Road building strategy is contradictory | 5 |
| Safer cycle routes needed | 5 |
| Other policies do not align with DS13 | 4 |
| Unrealistic to expect people to give up cars | 4 |
| Doesn't take into account older people | 4 |
| Plan takes away freedom for residents | 4 |
| Support the hierarchy | 4 |
| Does not account for different abilities | 4 |
| Hierarchy does not support realities of life | 3 |
| Good to see prioritisation of low carbon and healthy movement | 3 |
| Walking paths should be well lit | 3 |
| Cycling is not realistic in weather | 2 |
| Policy is contradictory to new road building | 2 |
| Provision needed for disabled people | 2 |
| Policy is flawed | 2 |
| This should come into force sooner | 2 |
| Scrap eastern movement corridor | 2 |
| Include e-scooters | 2 |
| Public transport to be zero emission | 2 |
| Public transports need to have lower emissions | 1 |
| Park and ride must be free | 1 |
| Discrimination between vehicle types is not acceptable | 1 |
| Policy can be achieved through land off Well Lane, Fordwich | 1 |
| Provide alternatives before removing what people are used to | 1 |
| Zoning scheme is inappropriate | 1 |
| Ban private cars from city between 8am and 5pm | 1 |
| Include electric pods | 1 |
| Add private vehicle with zero emissions | 1 |
| Banning traffic will not help | 1 |
| Disagree with ULEZ zones | 1 |
| Enforce motorist | 1 |
| Cycling to be equal to walking | 1 |
| Rural areas have not been considered | 1 |
| Hierarchy needs to be flexible | 1 |
| Include future modes of transport, hydrogen | 1 |
| Equestrian to be included alongside cycling | 1 |
| Unclear how hierarchy is to be applied in all circumstances | 1 |

No changes have been made to Policy DS13. Having considered the representations made throughout the Local Plan consultation the Transport Strategy has been changed to be a bus-led strategy with improvements to sustainable and public transport. Therefore, the Eastern Movement Corridor and circulation plan are no longer being proposed.

## Policy DS14: Active and sustainable travel

| **Comment** | **Number of comments** |
| --- | --- |
| Improve bus service | 9 |
| Improvement to cycle and footpaths | 8 |
| Provision must be made for those that can't walk/cycle | 3 |
| Ban e-scooters | 2 |
| More consideration to rural communities | 2 |
| Canterbury is hilly and not accessible | 1 |
| Accessible path along Adisham Rd | 1 |
| No mention of other modes of transport such as scooters or boarding | 1 |
| Policy is unrealistic | 1 |
| Expand existing car parks | 1 |
| Apply to existing areas of housing | 1 |
| Fine motorists | 1 |
| Policy for over 300 homes needs to be dropped | 1 |
| Plans should become before housing developments | 1 |
| Consideration given to families | 1 |
| Most people won't cycle in bad weather | 1 |
| Support active travel | 1 |
| Existing public rights of way need to be maintained | 1 |
| Building new roads is contradictory to active travel | 1 |
| Plan is flawed | 1 |

Having considered the representations made throughout the Local Plan consultation the Transport Strategy has been changed to be a bus-led strategy with improvements to sustainable and public transport. Therefore, the Eastern Movement Corridor and circulation plan are no longer being proposed.

Point 1 has been expanded to clarify that walking and cycling routes must be delivered early on in the build out of a development to encourage sustainable travel habits from the offset. Further clarity has also been added to Point 1 regarding the design of walking and cycling routes.

The potential requirement for developers to contribute to improved bus services has been added to Point 2, in line with the updated draft Canterbury District Transport Strategy (2024).

## Policy DS15: Highways and parking

| **Comment** | **Number of comments** |
| --- | --- |
| Parking charges are unaffordable | 4 |
| In Favour of EV charging points | 4 |
| Increase in EV charging points is important | 3 |
| Unrealistic proposal | 3 |
| Improve public transport | 3 |
| Contradicts road building plans | 3 |
| Housing developments will increase traffic | 3 |
| Support sustainable travel | 2 |
| Improve foot and cycle paths | 2 |
| Wording of policy needs strengthening | 2 |
| Developers need to be responsible | 2 |
| Support the policy | 2 |
| Existing roads need maintaining | 2 |
| Heavy traffic concerns on Maypole Rd through Hoath | 2 |
| Transport issues to be resolved in Hythe | 1 |
| Support parking standards | 1 |
| Measures to include highways do not account of number of new homes | 1 |
| Parking is too expensive | 1 |
| Sanction developers if transport facilities are not provided | 1 |
| Parking is too much of a high priority | 1 |
| Support development of freight distributions | 1 |
| Vision and Validate the basis for transport assessment | 1 |
| Car free in the city and towns is not practical | 1 |
| Feel that councillors get priority parking | 1 |
| In 4d - remove severe and change to significant | 1 |
| Provision must be made for those that cannot cycle or walk | 1 |
| Puts off tourist to the city | 1 |
| More consideration for motorcyclist | 1 |
| More park and ride facilities | 1 |
| Free parking | 1 |
| EV replacing cars will contribute to congestion | 1 |
| Private cars need to be higher up | 1 |
| Quantity of parking spaces to homes is not practical | 1 |
| Apply to existing housing developments | 1 |
| Reference to active/passive EV charging points | 1 |
| No provision for disabled parking bays | 1 |
| Further consideration given to disabled people | 1 |
| Introduce a ban on pavement parking | 1 |
| The city being car free is not realistic | 1 |
| Stop building on city centre car parks | 1 |
| Agree with charging for parking | 1 |
| Disagree with this policy | 1 |
| Support optimising walking and cycling | 1 |
| Policy needs rewording and strengthening | 1 |
| Should include safe access to sites in lorries etc. | 1 |
| Parking for bikes to be included | 1 |
| Concern that developers are not proposing new roads | 1 |
| Input the protection of rural lanes | 1 |
| Need to take into account other vulnerable road users including horse riders | 1 |
| Greater flexibility in parking design | 1 |

All the representations made on this policy have been analysed and considered. Point 3f has been added, requiring developments to maximise the internalisation of trips within the site.

## Policy DS16: Air quality

| **Comment** | **Number of comments** |
| --- | --- |
| Building more houses will equal more pollution | 8 |
| Disagree with bypasses which will increase traffic | 7 |
| Assessments should be made on smaller developments too | 4 |
| Plant more trees | 2 |
| How will the increase in traffic be addressed | 2 |
| Increase in houses will increase pollution | 2 |
| Specific proposal to limit traffic near schools | 2 |
| Improve public transport | 2 |
| Support proposals for improving air quality | 2 |
| Concern on the loss of green space | 2 |
| Targets for developers to meet | 2 |
| Unsure if the policy can be met | 1 |
| Our air quality is fine as it is | 1 |
| Need a clear plan of how this will be delivered | 1 |
| Actively reduce travelling time to try and reduce emissions | 1 |
| Eastern movement corridor creating more traffic | 1 |
| Regular independent air testing needed | 1 |
| Air quality needs to be improved, not at the expense of others | 1 |
| Issue has had too little attention | 1 |
| EV are worse for air quality | 1 |
| Proposals are too weak to make an impact | 1 |
| Regular independent air quality testing | 1 |
| Brookland farm restrictions to keep it carbon neutral | 1 |
| Introduce a low emission zone | 1 |
| Add natural solutions to para 1c | 1 |
| More walking and cycling paths needed | 1 |
| Nothing proposed to improve Whitefriars or St Dunstans air quality | 1 |
| Address issues of air pollution from wood/coal burning | 1 |
| Concern for loss of habitats | 1 |
| Disagree with policy | 1 |
| Impact of construction is not considered | 1 |
| Better air quality standards for commercial and residential buildings | 1 |
| Requirements exceeds NPPF | 1 |
| Approach is not justified and should be amended to match national policy | 1 |
| Air quality impacts ecological as well as human receptors | 1 |

All of the representations made on this policy have been analysed and considered. The new draft transport strategy proposes a bus-led approach, encouraging modal shift from cars to public transport.

Within policy DS16, developers have been asked to demonstrate neutrality where there are residual emissions identified.

The number of new homes proposed in the new draft Local Plan has been significantly reduced, which should have a positive impact on air quality when compared to the previous draft Local Plan.

Having considered the representations made throughout the Local Plan consultation the Transport Strategy has been changed to focus on sustainable transport modes, so the Eastern Movement Corridor is no longer being proposed.

Alongside the consultation of the new draft local plan, a new draft Air Quality Action Plan is being published for consultation. This includes a series of measures to mitigate the effects of air pollution and improve air quality in the air quality management areas.

## Policy DS17: Habitats of international importance

| **Comment** | **Number of comments** |
| --- | --- |
| Greater flexibility of policy wording | 5 |
| Concern for disruption of habitats | 4 |
| Concern of waste water distributions in stodmarsh | 3 |
| Improvement to sewage systems needed | 3 |
| Eastern movement corridor contradicts policy | 3 |
| Approach to international importance is flawed | 2 |
| Mitigation won't help to preserve habitats | 2 |
| Need to protect precious habitats | 2 |
| Concern of the failure and under capacity of current sewage systems | 2 |
| Developments not linking to existing sewage systems should not be approved | 2 |
| More houses the more these areas become significant | 2 |
| The approach is legally flawed | 1 |
| Concern of the condition of Stodmarsh | 1 |
| Mitigation is a recipe for disaster | 1 |
| Any development in rough common will have negative impact on Blean woods | 1 |
| End of point 7 needs to be strengthened | 1 |
| Local stakeholders need to be consulted | 1 |
| Issues should be handled at government level | 1 |
| Preserving and improving water quality in rivers needs to be high priority | 1 |
| Stay connected to mains sewerage system under Southern Water | 1 |
| Who is responsible for monitoring wastewater treatment works | 1 |
| Dumping of sewage in adverse weather is unacceptable | 1 |
| Concern for air quality beside Blean Woods | 1 |
| No reference to off site solutions | 1 |
| Proposals for more than 300 homes must ensure high quality wastewater treatment | 1 |
| Agree with policy | 1 |
| Old Park and Chequers Wood to be included | 1 |
| Climate change and surface water putting villages at risk of flooding | 1 |
| Stodmarsh to be restored to health condition | 1 |
| Numbers driven by WWTW rather than the needs of the site | 1 |
| Wording needs to be strengthened | 1 |
| Like to see inclusion of how to reduce waste water | 1 |
| Not clear how sites comply with policy requirements | 1 |
| Riverside corridor along Stour and Hambrook marshes needs protecting | 1 |
| Area behind Wincheap needs enhancing for wildlife | 1 |
| Suitable ecosystem projections and digital simulations to be carried out | 1 |
| Local plan should not set permit limits | 1 |
| Revisit with government guidance from Natural England | 1 |
| Coastal catchment area to be included | 1 |
| Further evidence needed on costs | 1 |
| Change wording to clarify would would be a significant adverse effect | 1 |
| Include Nethergong Penn inlet | 1 |

While all of the representations made on this policy have been analysed and considered, it is important to note that the designations protected under *Policy DS17: Habitats of international importance* are those protected due to their international importance. Therefore, the council cannot determine which sites are protected under these designations and the protection afforded by this policy is in line with the legal requirements and NPPF.

Having considered the representations made throughout the Local Plan consultation the Transport Strategy has been changed to focus on sustainable transport modes, so the Eastern Movement Corridor is no longer being proposed.

It was also identified the incorrect year had been used when referring to the Habitats Regulations. This has now been addressed, and corrected from 2010 to 2017.

A new point has been added at 6, to address sites which may be Functionally Linked Land. This is in response to comments made during the consultation (by Natural England) and our Habitat Regulation Assessment work.

Water quality concerns at Stodmarsh, nutrient neutrality and mitigation options are addressed within the Nutrient Mitigation Strategy (2024), alongside discussions with Natural England. As such Point 8 (formerly Point 7) of the policy has been updated to reflect comments made through the consultation, the updated Nutrient Mitigation Strategy and discussions with key stakeholders, such as Natural England.

## Policy DS18: Habitats and landscapes of national importance

| **Comment** | **Number of comments** |
| --- | --- |
| Stronger protection for SSSIs | 23 |
| Protect Old Park and Chequers Wood | 18 |
| Strengthen words and leave no wriggle room | 10 |
| Support the policy | 6 |
| Look at the impact of the eastern movement corridor on Old Park SSSI | 6 |
| Ancient woodlands need to be protected | 4 |
| Concern relating to nutrient loading in local chalk streams | 4 |
| Contradicts eastern movement corridor | 4 |
| Strengthen the protection of SSSIs | 3 |
| Every effort to be made to protect valuable resources | 3 |
| Protect Old Park and Chequers Wood | 2 |
| Concern no natural habitat will be left | 2 |
| Words in point 6 need amending | 2 |
| 7b is a high priority | 2 |
| Wording of NPPF para 180 is reflected within policy | 2 |
| Concern of the disturbance around Thanington Saxon Fields | 1 |
| Protect natural habitats | 1 |
| Look at impact of wastewater developments on Stodmarsh SSSI | 1 |
| Alternative options by southern water to say connected to main sewerage system | 1 |
| Pipeline in Nailbourne is unacceptable | 1 |
| Should mention Stour Valley country park | 1 |
| Policy validates the need to not build from Sturry to Bridge | 1 |
| Apply to existing housing sites | 1 |
| Landscape will be damaged if more homes are built | 1 |
| Taking into consideration unique biodiversity | 1 |
| Point 7 to be strengthened | 1 |
| Pressure on southern water to update treatment plans | 1 |
| Protect North Downs | 1 |
| Commitment to establishing meaningful buffer zones for habitats | 1 |
| Ensure woodlands and trees are protected | 1 |
| Define major development and exceptional circumstances | 1 |

All of the representations made on this policy have been analysed and considered. Further discussions with Natural England and changes to the national legislation have resulted in amendments to the wording to ensure compliance with the NPPF. This includes separating protected and priority species and priority habitats into a new Point 7, while Point 6 becomes specific to irreplaceable habitats. Also, the Local Plan reflects the national change requiring the ‘furtherment of the goals of the AONB’.

Having considered the representations made throughout the Local Plan consultation the Eastern Movement Corridor is no longer being proposed.

Chequer's Wood and Old Park is a Site of Special Scientific Interest (SSSI) and is therefore protected by this policy, in line with national protections.

Nutrients and the issues associated around Stodmarsh are discussed in the Nutrient Mitigation Strategy. The requirement to ensure there are no adverse effects on the integrity of the Stodmarsh SAC/SPA/Ramsar site and possibly suitable nutrient neutrality mitigation is set out in *DS17: Habitats of international importance*.

## Policy DS19: Habitats, landscapes and sites of local importance

| **Comment** | **Number of comments** |
| --- | --- |
| Protect Old Park and Chequers Wood, include Local Landscape Designation | 24 |
| Create policy to join up areas of unspoilt ancient habitats | 12 |
| Protect valuable green space | 8 |
| More robust statement in defence of wildlife and biodiversity | 7 |
| Blanket ban on further encroachment into nature | 6 |
| Support the policy | 5 |
| Greater protection needed for Wincheap Meadow | 5 |
| Proposed development would harm natural habitats | 4 |
| Policy wording needs to be strengthened | 4 |
| Policy is conflicting with others in the plan | 4 |
| Further protection for Stour Valley | 4 |
| Safeguard woodlands for biodiversity net gain | 3 |
| Stop the eastern movement corridor | 3 |
| Wincheap meadows to be included | 2 |
| Point 3 to include Nethergong Penn and Sarre Penn | 2 |
| Protect Old Park and Chequers Wood | 2 |
| Inclusion of new green gap between Upstreet and Hersden | 2 |
| Do not support Radfall Green Gap | 2 |
| Have a bigger Green Gap around Whitstable | 2 |
| Area west of Fordwich to be a designated gap | 2 |
| Protect the Green Gap between Canterbury and Herne Bay | 1 |
| The exceptions and mitigation options undermine the policy | 1 |
| Not enough Green Gaps in the proposal | 1 |
| Support protection of green spaces | 1 |
| The mitigation will not preserve habitats | 1 |
| Grass roots engagement needed on protection of wildlife | 1 |
| Wording may create barrier to statutory utility providers | 1 |
| Only permit sports and recreation in Green Gaps | 1 |
| Needs to be clear how the benefit of the development will out way the effects on environment | 1 |
| Protect North Downs | 1 |
| Green Gap between Rough Common and Canterbury | 1 |
| Adequate mitigation and compensation measures should be agreed | 1 |
| Rural communities have not been considered | 1 |
| Impacts of the local site network should be included | 1 |
| Designate the open space in St Stephens area | 1 |
| Protect Church St Playing Fields in Whitstable | 1 |
| Further allowance for green and blue infrastructure | 1 |
| Protect Duke and Neals Place meadows | 1 |
| Whole area of Popes Lane should be a Green Gap | 1 |
| Object to Land West of Bodkin Farm inclusion | 1 |
| Land off Grasmere have not been assessed in SHLAA | 1 |
| Protect the recreation ground in Bridge | 1 |
| Add UKCs commitment to not build on southern slopes | 1 |

All of the representations made on this policy have been analysed and considered. Where relevant amendments have been made to supporting evidence documents, such as the Natural Environment and Open Space Topic Paper (2024). This Topic Paper also includes a review of the sites identified through the consultation process as potential sites for protection.

The Chequer's Wood and Old Park area has been reviewed, and the Eastern Movement Corridor is no longer being proposed as part of the Transport Strategy. The area is predominantly protected as a Site of Special Scientific Interest, which is a national designation. As reflected in *DS18: Habitats and landscapes of national importance*, the protection afforded to SSSI’s is greater than that awarded to Local Landscape Designations.

Wincheap Meadow has been assessed within the Natural Environment and Open Space Topic Paper (2024). The site is protected as a Local Wildlife Site under Policy DS19, as Flood Zone 2 and 3 under Policy DS20 and safeguard for wetland under Policy DS17. Half of the area is also a Local Nature Reserve under Policy DS19. As the site is already heavily protected and there are uncertainties about its capability to endure beyond the end of the plan period as a Local Green Space, no further designations are proposed.

All comments relating to Green Gap designations have been reviewed. The methodology for assessing Green Gaps has been amended, with the revised methodology outlined in the Natural Environment and Open Space Topic Paper (2024). The study areas assessed within the document have been re-assessed with consideration for the updated methodology. Key changes include the study area ‘between Fordwich and Sturry’ no longer being proposed for inclusion in light of the updated methodology; the change in study area and boundary extent ‘between Canterbury and Chartham’; and the assessment of two new sites, ‘between Upstreet and Hersden’ and ‘between Maypole and Hoath’, neither of which have been proposed for inclusion as a Green Gap in the draft Local Plan.

The inclusion of the Green Gap ‘between Whitstable and Radfall’ covers the same area as the previous Regulation 18 draft Local Plan consultation (2022). No additional slip roads to those included in the Brooklands site allocation policy are proposed at this time. However, should a need for strategic infrastructure within a Green Gap be identified in the future this will be considered appropriately at such time.

## Policy DS20: Flood risk and sustainable design

| **Comment** | **Number of comments** |
| --- | --- |
| Agree with policy | 7 |
| No more development on green sites | 7 |
| Provision needed for rising sea levels | 5 |
| Allow more soft land for water to drain | 5 |
| Is SUDS suitable for flood plain area | 3 |
| Too many loopholes | 2 |
| Should not build on flood zones 2 and 3 | 2 |
| Need a flood risk zone map | 2 |
| DS20 would failed by R1 unless the surface and groundwater systems are built | 1 |
| Supportive of active encouragement of multi-functional green and blue infrastructure | 1 |
| There are specific requirements for particular sustainable drainage systems | 1 |
| Sustainable drainage systems will not stop flooding | 1 |
| Drainage will not cope with more houses being built | 1 |
| Support it includes identified drainage provision | 1 |
| The EMC route passes through flood zone 3 | 1 |
| Pump it into the english channel | 1 |
| Stour Valley and Hambrook Marshes are important | 1 |
| Risk assessments are needed | 1 |
| SUDS systems must remove 50% of phosphorus | 1 |
| Decisions to be made must have zero risk of contamination | 1 |
| No faith in council | 1 |
| No real solution has been proposed to mitigate flooding | 1 |
| Tankering is unacceptable and unsustainable | 1 |
| Penalise developers who don't comply | 1 |
| Should be included in a water policy for the district | 1 |
| New and existing car parks to be made self-draining | 1 |
| Chartham Paper Mill site to make sure of Exception Test | 1 |
| No evidence to how the decision has been made | 1 |
| Follow NPPF on sequential tests | 1 |
| Amend to follow new government rules for development sites | 1 |
| Protect Stour Valley | 1 |
| Need a policy for rainwater harvesting | 1 |
| Concerned SUDS impact heritage assets | 1 |

All of the representations made on this policy have been analysed and considered, alongside the relevant legislation including the NPPF. Further information has been provided in the supporting text on source protection zones and the Environment Agency’s related guidance.

Having considered the representations made throughout the Local Plan consultation the Eastern Movement Corridor and previous policy R1: Land at Cooting Farm are no longer being proposed.

The current Flood Zones are identified within the council’s Strategic Flood Risk Assessment (2024). However, the Environment Agency publishes information relating to the Flood Zones affecting the district and keeps this information up to date.

The water hierarchy, which outlines the required order of preference in which surface water should be discharged, has been moved from Policy DM15 to Policy DS20. This is to ensure that the water hierarchy is implemented on a strategic policy level throughout planning and development.

## Policy DS21: Supporting biodiversity recovery

| **Comment** | **Number of comments** |
| --- | --- |
| Protect Blean Wood, Old Park and Chequers Wood | 16 |
| Update policy to be consistent with the Environment Act | 15 |
| Deliver 10% biodiversity net gain | 15 |
| 20% for trees is not enough | 10 |
| Don't destroy existing habitats | 9 |
| Concern of more housing developments | 8 |
| Developers should not be allowed to opt out | 7 |
| Stop eastern movement corridor | 7 |
| EMC will fragment existing green space and habitats | 5 |
| Policy is not strong enough | 5 |
| Support 20% BNG | 4 |
| Who will monitor this policy | 4 |
| Conflict with other policies | 4 |
| Lack of data on biodiversity | 3 |
| Apply a threshold approach to over a certain amount of homes | 3 |
| Not reasonable for smaller schemes | 3 |
| Support the plan | 2 |
| BNG cannot replace established habitats | 2 |
| Apply policy to ensure existing open space and green gaps are protected | 2 |
| 25% biodiversity would be greater benefit and achievable | 2 |
| Lack of evidence why this level of net gain is required | 2 |
| Is this policy deliverable | 2 |
| Removing trees or hedgerow should be last resort | 2 |
| Doesn't include Local Nature Recovery Strategies | 2 |
| Achieving 20% is not always possible on all sites | 2 |
| Do not support BNG to be above Environment Act 10% requirement | 1 |
| How has this been calculated and benchmarked | 1 |
| Lacking evidence | 1 |
| Identify how tree cover can be achieved | 1 |
| Agree to protect hedgerow | 1 |
| Ancient woodland needs to be protected | 1 |
| Strongly support suggestion for 20% tree cover | 1 |
| Protect Old Park & Chequers Wood | 1 |
| Concern amount of houses and roads being built | 1 |
| Commitment to enhance PROWs is important | 1 |
| Exclude reference to schemes viability | 1 |
| Evidence needed for increase from 10% to 20% BNG | 1 |
| Investigate the impact of biodiversity of all developments | 1 |
| Protect breeding birds | 1 |
| Disagree with plan | 1 |
| Council contractors need to be trained in biodiversity | 1 |
| This plan does the opposite to supporting biodiversity | 1 |
| Request interim target for smaller sites | 1 |
| R1 and R20 go against biodiversity | 1 |
| Bigger Green Gaps needed | 1 |
| Ban urban use of pesticides | 1 |
| 20% minimum should apply for all sites | 1 |
| Additional guidance on trees selection and consideration of species needed | 1 |
| BNG to be supported by suitable maps | 1 |
| Protect greenfield sites | 1 |
| 20% is undeliverable | 1 |
| Take into account ecological value of existing trees | 1 |
| Protect notable tree species | 1 |
| Separate green infrastructure and BNG in the policy wording | 1 |

All of the representations made on this policy have been analysed and considered.

Numerous representations were received expressing concerns about the impact of the Eastern Movement Corridor. The new draft Reg 18 Local Plan sees the removal of the Eastern Movement Corridor and therefore effectively addresses concerns regarding impact on the Site of Special Scientific Interest. The need to positively protect the health of the Old Park and Chequers Wood SSSI through appropriate management and monitoring of the site's biodiversity and geological interests remains. Therefore Old Park and Chequers Wood have been embedded, where appropriate, in the draft Open Space Strategy (2024), the Canterbury district Tree, Woodland and Hedge Strategy (2024) and the emerging Canterbury District Biodiversity Plan - a nature recovery strategy (2024). The latter document will inform the Canterbury district’s contribution to the county-wide work on Making Space for Nature, linked to the Environment Act’s pursuit of a Local Nature Recovery Network.

Numerous comments were also received on the setting of the district’s Biodiversity Net Gain target. The 20% Biodiversity Net Gain target is retained. It is consistent with the Council’s declaration in 2023 of a biodiversity emergency and the council’s determination to realise opportunities to realise nature recovery across the district. The Environment Act promotes the mandatory 10% biodiversity net gain as a minimum, not a maximum. Policy DS21 20% appropriately expands on the Environment Act’s intentions.

Representations were received that sought clarification on a point of additionality in relation to the provision of BNG at 20%, plus the tree canopy at 20% and also the need to provide tree lines streets (NPPF) and the semi-natural publicly accessible open space (Open Space Strategy 2024). The target of 20% tree cover within developments of over 300 homes is retained and the policy now clarifies that the 20% tree cover can be included as contributions to Biodiversity Net Gain (above 10%), Street Lined Trees and semi-natural open space contributions.

## Policy DS22: Landscape character

| **Comment** | **Number of comments** |
| --- | --- |
| Support the policy | 13 |
| Developments are harming the habitat and landscapes | 12 |
| Apply policy to Old Park and Chequers Wood | 9 |
| Approved developments conflict this policy | 7 |
| Protect Old Park and Chequers Wood | 5 |
| Many developments conflict this policy | 4 |
| Support the policy | 4 |
| EMC would change the character of the area | 3 |
| Rigorously enforce this policy | 2 |
| EMC goes against this policy | 2 |
| Recognise the health benefits of a good PROW | 2 |
| Large housing estate do not preserve character | 2 |
| Brooklands Farm conflicts DS22 | 2 |
| Protect Stour Valley | 2 |
| What constitutes an important long distance view | 2 |
| Don't minimise public benefits for the landscape | 1 |
| Does not protect areas of high landscape value | 1 |
| Many developments cannot fail to have an adverse effect on landscapes | 1 |
| Public consultation on all proposed developments | 1 |
| All country parks accessible by equestrians | 1 |
| Preserve mature trees | 1 |
| Include equestrians | 1 |
| R15 is not in keeping with policy | 1 |
| Public consultation on all developments local people included in designing homes | 1 |
| Not applying rigorous standards | 1 |
| Prioritise brownfield sites | 1 |
| Protect the natural environment of the district | 1 |
| Is this policy achievable | 1 |
| Protect historical landscapes | 1 |

All of the representations made on this policy have been analysed and considered. The Landscape Character Assessment and Biodiversity Appraisal 2020, and Kent Downs AONB Landscape assessments referred to within *Policy DS22: Landscape character* include consideration of historic landscapes and trees.

The Old Park Landscape Character Area is included within this policy and the Landscape Character Assessment and Biodiversity Appraisal 2020. Having considered the representations made throughout the Local Plan consultation the Eastern Movement Corridor is no longer being proposed.

As an important part of the district, the policy has been amended to include reference to seascape and the South East Marine Plan Seascape character assessment, where appropriate.

Requirements and guidance related to tranquillity have been moved from Policy DM17, to Policy DS22. Tranquility contributes significantly to landscape character and it is important that it is implemented at a strategic policy level throughout planning and development.

## Policy DS23: The Blean Woodland Complex

| **Comment** | **Number of comments** |
| --- | --- |
| Should be no development that affects Blean woods | 6 |
| Support the policy | 3 |
| Stop the EMC | 3 |
| Align this policy to Wilder Blean initiative map | 3 |
| Concern on wording of para 4 | 2 |
| This should apply to all woodland areas | 2 |
| Stops expansion which leads to bottleneck of wildlife movement | 2 |
| Support the Wilder Blean project | 1 |
| Policy should cover the whole district | 1 |
| Concern on wording of para 4 | 1 |
| Developments need to positively enhance landscapes | 1 |
| Mention the bison | 1 |
| Impose penalties to any transgression | 1 |
| Improve public transport to Blean Woods | 1 |
| Rewilding will attract more tourists and cars | 1 |
| How does this protect Blean nature | 1 |
| Wording is inconsistent and leads to ambiguities | 1 |

All of the representations made on this policy have been analysed and considered. In acknowledgement of the Wilder Blean initiative, the Blean Complex policy has been expanded to encourage consideration of wilding opportunities that are linked to natural regeneration and landscape scale nature recovery. The need to ensure future commercial forest practices support the Wilder Blean initiative the need to ensure future works support the primary conservation goals has been made explicit. The need to respect opportunities to increase woodland connectivity has been added.

## Policy DS24: Publicly accessible open space and sports

| **Comment** | **Number of comments** |
| --- | --- |
| Who will manage and maintain these sites | 4 |
| Support the policy | 3 |
| Important for physical and mental health | 3 |
| Policy is ambitious and goes above and beyond the requirements | 3 |
| Don't allow developers to opt out | 2 |
| Assess the need for these facilities | 2 |
| Council to work with developers to update public spaces | 2 |
| Who is responsible for maintenance | 1 |
| Not including village greens | 1 |
| Data in open space assessment is confusing and miss leading | 1 |
| Criteria 8 is too restrictive | 1 |
| Disagree with the policy | 1 |
| Space needs to be usable and good quality | 1 |
| Allow free parking and provide public transport to open areas | 1 |
| Open areas help to reduce flooding | 1 |
| Doesn't address existing open spaces and sports areas | 1 |
| Need for a football stadium in canterbury | 1 |
| Lack of evidence | 1 |
| Include Church Street playing fields | 1 |
| Policy needs to be strengthened | 1 |
| Needs to recognise the value of agricultural land | 1 |
| Allotment provision is inadequate | 1 |
| Look at Australian playgrounds | 1 |
| Enhance the access to the river | 1 |
| More skateparks needed | 1 |
| No provision on south side of Canterbury | 1 |
| Target areas of social and economic deprivation | 1 |
| Passive recreation is more important for older people | 1 |
| Object to para 4 | 1 |
| Ensure it does not negatively impact biodiversity | 1 |
| Merton Park is a valued open space | 1 |
| Need a design code for sustainable and landscape development | 1 |
| Ponds and village greens to be counted as open space | 1 |
| Welcome inclusion of horse riding routes | 1 |
| Sites over 300 homes should make an endowment to the council | 1 |
| Developers need to protect green space | 1 |
| Don't allow developers to opt out | 1 |
| Who will manage the endowment fund | 1 |
| Are all areas of housing adequately served | 1 |
| Ensure enhanced policy requirement is justified | 1 |
| Difference in informal and formal open space recreation | 1 |
| Do not agree with extra football pitches | 1 |
| Large financial implication for developers | 1 |

All of the representations made on this policy have been analysed and considered.

In response to the representations on policy DS24 and the Open Space Strategy (2023), the OSS has been amended to better reflect biodiversity interests across all open spaces. This is also consistent with the council’s declaration of a Biodiversity Emergency.

Criteria has been added to point 5 to require play provision to reflect Making Space for Girls guidance, to be designed with opportunities for users with disabilities and to provide cultural infrastructure such as public art, in line with the council’s Cultural Strategy.

Point 6 has been amended to require development of more than 50 homes to obtain relevant open space designations, rather than proposals of more than 300 homes.

The promoted concept of endowments for schemes of over 500 homes has been developed to focus on wider stewardship interests and the ‘tools’ required and processes to be followed to secure community involvement in the in perpetuity maintenance of larger open spaces have been redrafted in appendix 4 of the Open Space Strategy (2024).

## Policy DS25: Renewable energy and carbon sequestration

| **Comment** | **Number of comments** |
| --- | --- |
| All new buildings to have solar panels | 3 |
| Protect greenfield sites | 3 |
| Vegetation and soil sequesters carbon | 3 |
| Protect landscape and heritage | 2 |
| EMC will create large amount of carbon emissions | 2 |
| Apply to all council assets | 2 |
| On-site renewables must be accorded significant weight | 2 |
| Contains a large threat to countryside and rural communities | 2 |
| Policy is unclear | 2 |
| Support policy | 1 |
| Agree with solar panels | 1 |
| Protect greenfield sites | 1 |
| Provide grants for solar panels | 1 |
| Follow national guidance | 1 |
| Address the route course of climate change | 1 |
| Renewable energy must be encouraged | 1 |
| Clean carbon is the way forward | 1 |
| Aim to be fossil fuel free zone by 2030 | 1 |
| Renewable energy needs to be a requirement for all developments | 1 |
| Allow animals on solar farms | 1 |
| Plan needs strengthening | 1 |
| Developers and industrial properties must play their part | 1 |
| Allow private households to install renewable energy systems | 1 |
| Utilise rooftops instead of land for solar energy | 1 |
| Mature trees are more efficient than newly planted | 1 |
| Price cap needed to not exploit customers for electricity | 1 |
| Inadequate and inaccurate proposals | 1 |
| Gives to caveat to appropriate locations | 1 |
| Expect more detail including clear targets | 1 |

All of the representations made on this policy have been analysed and considered. Various approaches to this policy were explored by the council following the representations received, and policy draft wording has been revised based upon these considerations. Current proposed wording states that weight will be given based on carbon emissions reduction and energy resilience that the projects can deliver.

Requirements for renewable energy in relation to new development have been demonstrated in policy DS6 and within the Sustainable Design Guide SPD, which will go out to consultation alongside the new draft local plan.

## Policy DS26: Historic environment and archaeology

| **Comment** | **Number of comments** |
| --- | --- |
| Recognise importance of Old Park and Chequers Wood | 14 |
| Recognise important of Fordwich Pit | 13 |
| Local archaeological sites should be safeguarded | 10 |
| More implementation and enforcement needed | 6 |
| Protect all heritage assets | 4 |
| All the development threatens heritage | 3 |
| Must protect the World Heritage status | 3 |
| Preserve and enhance heritage assets | 3 |
| Enforce and fund maintenance of heritage sites | 3 |
| Developments in conservation area should preserve or enhance | 3 |
| EMC goes against this policy | 3 |
| Strongly disagree with policy | 2 |
| Recognise Fordwich Pit and Old Park and Chequers Wood | 2 |
| Ensure all developments are properly evaluated | 2 |
| Housing developments are destroying views | 2 |
| Reinstate an archaeological officer in CCC | 2 |
| Widen the policy for the rest of the district | 2 |
| Should include historic villages | 2 |
| Make reference to Canterbury World Heritage Site | 2 |
| Link developments with heritage and cultural assets | 2 |
| Need a programme to protect and develop heritage sites for public use and view | 2 |
| Capture as much evidence of our local history as possible | 1 |
| Support being supportive of making heritage buildings energy efficient | 1 |
| This should be covered by planning laws | 1 |
| Christchurch University went against this policy | 1 |
| R15/R16 conflicts with this policy | 1 |
| Heritage statements to be commission from an independent expert | 1 |
| Greater definition of harm needed | 1 |
| Christchurch STEM building doesn't comply | 1 |
| Protection of views should be across all historic landmarks | 1 |
| Clearer guidance on World Heritage status needed | 1 |
| Policy underplays the importance of heritage | 1 |

All of the representations made on this policy have been analysed and considered. The policy includes reference to the requirement of a Heritage Impact Assessment in line with UNESCO’s latest guidance and toolkit which aims to help find the best possible solutions to meet both conservation priorities and development needs.

Reference has been added to the policy (criteria 11), surrounding the retrofitting of our historic building stock to a forthcoming SPD which will provide clear guidance on the subject.

Point 13 has been strengthened to say that where development would adversely affect the archaeological and historic integrity of designated heritage assets, it will not be permitted.

## Other comments

| **Comment** | **Number of comments** |
| --- | --- |
| Premise of the plan is to generate revenue from developers | 2 |
| Fails to distinguish between strategic sites and smaller sites | 2 |
| Lack of evidence or research to support proposals | 1 |
| Interactive map is difficult to read | 1 |
| Focuses too much on building houses | 1 |
| Bias towards developers | 1 |
| Little consideration to rural communities | 1 |
| Keep natural biodiversity in place | 1 |
| District-wide policies are in line with key national and international strategies | 1 |
| Consider long term implications of developments | 1 |
| Policies are too onerous and will ultimately affect deliverability of sites | 1 |
| Will have adverse impacts on house building | 1 |
| A lot of the policies conflict | 1 |
| Develop policy to make use of locally sourced timber | 1 |
| Consider locally sustainably sourced wood fuels | 1 |
| Generally supportive | 1 |
| Need a strategic plan for all sites | 1 |

All the representations made on this policy have been analysed and considered through the development of the draft Local Plan and draft policies map.

The interactive draft policies map has been reviewed and amended in the aim to make it easier to read.