

1. Summary

This is a personal response from Dave Wilson.

1.1. Document Structure and supporting documents

Although this response follows the draft Local Plan document structure for ease of analysis, the current draft Plan is difficult to follow, primarily because policies related to sites are placed before the sections on District Wide Strategic Policies and the Development Management policies. There is no obvious logic to the document's structure and it would be helpful to users of the Plan if those sections followed the Spatial Strategy section and came before the site assessments and policies.

This response addresses only the strategic sections of the plan: the Spatial Strategy (SS) and District Wide Strategic (DS) policy sections.

1.2. Overall strategy

This Local Plan is fundamentally flawed. It is based on misleading data and targets, resulting in the wrong type of housing being built in the wrong quantities in the wrong locations. That exacerbates rather than solves the District's traffic problems to which the proposed solution is coercive, expensive and almost entirely reliant on car journeys, which the Plan causes to be longer rather than shorter.

There is no rationale provided for extending the Plan period to 2045, rather than 2040. One can only conclude therefore that the purpose of the extension is solely to deliver a quantum of housebuilding which the Council assumes is required to generate the funds for strategic infrastructure projects, specifically the eastern by-pass and the so-called Canterbury Circulation Plan, which is simply restrictions on travel between City zones.

The housebuilding numbers proposed are wildly optimistic. The required number of homes to be built each year is double the number that has ever been achieved in the District in the past 10 years. If these numbers are not built then the financial basis of the Plan, which requires massive borrowing against future s106 and CIL funds, is unacceptably risky.

Further, failing to build 75% of the target number of homes will result in the Government suspending the provisions of the Local Plan. By setting such a high target number the risk of such failure is massively increased, which would result in interventions which would wholly undermine the many good aspects of the Plan.

There are major problems with the proposed siting of major developments. The allocation of sites has been wholly driven by developers and not by any genuine strategic consideration. This has led to a concentration of sites to the south of the City. That, in turn, is almost certain to create greater traffic problems, worse environmental impacts and a greater threat to the World Heritage Site (WHS) status of the City than any other option. The proposed site at Cootings Farm and the related adjacent sites would create a de facto small town to the south east of the District, merging into Aylesham and destroying the rural character of the area. The area south of Whitstable is proposed to have more housing built without any adequate infrastructure improvements or transport solutions. At the same time, the north east of the District has almost no new housing proposed despite its

desirable proximity to the coast and to the A299. This imbalance across the District is unjustified and damaging to existing communities.

Those communities will also be disadvantaged by the way in which s106 and CIL funding is proposed to be used. The Council has suggested passing up to 15% of those funds to Parish Councils, even though in general the Parished areas are the least affected by the proposed scale of development. Meanwhile there is no recognition that existing urban communities, in particular to the south of Canterbury, require amenity improvements and mitigating investment to offset the problems created by the massive adjacent developments.

Regardless of funding issues, the transport plan proposed is wholly inadequate. Modelling of the impacts of growth and the proposed mitigations appears to be confined solely to the impact on the number of car journeys. No attempt has been made to consider options with a far greater focus on public transport or on options which don't include an Eastern bypass. Some of the proposals for movement to the west of the City, through Broad Oak, and around Whitstable, are inherently unsound. Without meaningful modelling of alternative options the potential benefits of the transport plan cannot be properly judged.

The Eastern by-pass is repeatedly and deliberately referred to in this Plan as the Eastern Movement Corridor. That seems intended to give the misleading impression that it is not merely a road but something grander and less environmentally damaging. There is a complete absence of detail on routing and scale for the Eastern by-pass which makes any definitive criticism on the grounds of cost, impact or benefit impossible. That is wholly unacceptable in a near-final draft Local Plan.

Finally: there should be an evidence based approach to decisions. The current draft Local Plan is supported only by evidence (for example on housing demand) which is contested and a resulting analysis which is constrained by lack of thorough and objective data and modelling.

1.3. Benefits

Having said that, there are many elements of the Plan which are significant improvements on previous Local Plans. Its recognition of the importance of biodiversity, heritage, green space of various sorts, and of community engagement are a significant improvement on the previous plan. So, where I have not made a comment, I believe the policies to be beneficial.

1.4. Precision of Language

The document will be used as the basis for decisions by the Council, and specifically the Planning Committee. It is essential therefore that its language should be precise and clear, and legally meaningful and enforceable. Regrettably, the terminology used often falls short of these standards. There is therefore a serious concern that the resulting imprecision may mean that the Local Plan could be unenforceable, open to dispute and difficult for the Council to use.

For example, the following issues recur throughout the various policies:

- “Should” is used consistently when policies ought to say either “must” or “may”, depending on whether the Council considers the issue to be optional or not. If “should” means “must” then this ought to be made explicit at the start of the document.

- “High quality” is used repeatedly, and in different contexts, without any definition of what it means. Quality in this context is entirely subjective and effectively meaningless for decision making purposes.
- “Will be supported” is repeatedly used, when it would be better to say “will be considered”, since the former indicates a predetermined position rather than giving the planning officers and committee an opportunity to review a proposal
- There are several statements about applying “Garden City” principles but nowhere are these explained.
- There are a number of other highly subjective phrases used throughout the document, including: “vitality”, “viability”, “feasible”, “well designed”, “attractive”, “truly outstanding” and “closely aligned”. Again, these terms need either to be replaced with more clear phrases, or to be defined.

1.5. Policy opt-outs

Throughout the Plan developers are offered ways of opting-out of their site-specific obligations for, as an example, biodiversity net gain or green space provision. This is usually achieved by off-setting or off-siting the requirements. This is an inappropriate solution. If sites cannot meet the viability or feasibility requirements for these mitigations and enhancements within the site then in our view the site should not be developed. Biodiversity gain in particular cannot possibly be achieved through environmental enhancements elsewhere since by definition diversity of species requires diversity of habitat.

1.6. Site Policy issues - Prioritisation and Scale

In the geographical sections relating to the four main areas of the District, the Plan fails to distinguish between strategic sites and much smaller single plots, providing every location with its own set of criteria and policy specifics.

This inhibits the ability of readers, especially at this consultation stage, to identify and discriminate between the several major sites and a larger number of relatively minor sites.

At the same time, several major sites which are contiguous – for example, South of Littlebourne Road, Hoath Farm/Bekesbourne Lane and Canterbury Golf Club - are treated as separate developments when in fact their impact is as a single growth area and a genuinely strategic plan would treat them as such.

This approach also means that there is a high degree of repetition across all the location specific policies. It also has the effect of making it much more difficult for readers to track which “strategic” and “development management” policies apply to which site. It also, of course, increases the risk of contradictions between site specific policies and the strategic or district wide policies.

This could and should have been avoided.

Within the site-specific sections there are policies which are for differing purposes – for example, C10 is about a link road and C16 concerns the Eastern bypass. It would be more logical were the policies arranged by residential, commercial (e.g. C22), mixed use and other infrastructure (e.g. C24) within each geographic section. Other examples are R2 and R28, which might have been better included in the DS section

Also, at least one of the geographic allocations is wrong, in that C21 is for land in Bridge CP and therefore should be in the Rural section.

Many of the sites discussed in this plan are minor (e.g. St Georges' Place) and do not require specific discussion in this Plan. Instead, the Plan policies should be sufficiently robust to address any applications for those sites in line with the overall policy framework. By including them in the Plan at this stage the Council may be in effect pre-judging, or at least pre-empting, the role of the Planning Committee.

The following site policies should be removed from the Plan as they are not strategic in any sense:

- C2, C17, C18, C19, C20
- W9, W10
- HB5, HB7, HB9,
- R6, R9, R13, R25

2. Strategic plan

2.1. Summary

The Plan states that “Canterbury Urban Area will be the principal focus for development.” (para 128). It does not set out, and it has never been set out in any previous consultation, that to do this requires major changes to road traffic movement patterns within the City and the imposition of restrictions on residents’ freedom of movement. Nor is that assertion proven by the traffic plan, which has failed to assess sufficient alternative options. It has never been explained in previous consultations that the proposed movement restrictions and the so-called Eastern Movement Corridor were a prerequisite of that focus.

This was not an option set out in the 2021 consultation yet it seems, from comments made by the Council Leader and others, to have been the basis of traffic planning since at least 2020. There is no public support for these changes. (See comments on the Transport Paper, below).

2.2. Vision and Strategic objectives

These are good objectives and aims. However, it is not at all clear how specific policies which follow either support or achieve the vision and the objectives. The document would be improved if there were some explanations linking the objectives with the policies which follow.

There are several cases where the policies do not support the visions or water down the objectives in ways which are unacceptable. That is particularly true of the transport objectives set out on page 7, which says that the Council intends to:

“Create a transport network with a focus on low-carbon travel ensuring excellent access to city and town centres on foot, cycle and by public transport.”

That ambition is betrayed by the failure to model how alternative transport modes would reduce car travel, and by the insistence on creating an Eastern bypass.

2.3. Transport

The Transport Topic Paper dated October 2022 is, so far as one can tell from the draft Local Plan, the source of the Transport strategy set out in SS4. So far as background data is concerned, that Travel analysis is fundamental to the Plan but is very seriously flawed in terms of the limitations on the scope of the work carried out. It does not appear to support the conclusions reached by the Council in preparing this draft Plan.

The options tested were all related to the location of housing developments rather than to alternative transport modes (page 3), and to “highways interventions”, including the Eastern Bypass.

This focus on car-based travel means that non-vehicle based improvements – cycling and walking route enhancements and link-ups, reduction in car parking capacity, changes to car parking pricing, reduction in Park and Ride costs (options as set out below) – have not been properly considered or modelled. Such options should be a priority and should be installed, monitored and managed before any road building is considered.

2.3.1. The Circulation Plan

This has been rightly derided. It is an unworkable and draconian measure to force changes in travel behaviours. It ignores the reality of travelling around the City and the location of key sites residents might want or need to travel to which are not in the City Centre.

Examples of those include the schools, the K&C Hospital, supermarkets, the leisure centre and Riverside development, churches, doctors' surgeries, the sports grounds at the Spitfire Ground, Polo Farm, Canterbury Golf Club, and the University of Kent amongst others.

The Circulation Plan aims to close off so-called "rat runs", which are in effect the only cross-City routes, and force traffic out to the eastern bypass. That this will increase journey distances and cause more congestion at peak times - because traffic in any one zone will only have one route in and out of the City - seems not to have been shown up by any of the modelling. Nor does the effect of establishing two new schools in the Whitstable – Herne Bay corridor seem to have been taken into account.

The Circulation Plan has no legitimacy and it should be abandoned, with remodelling of alternatives properly carried out..

2.3.2. Existing Ring Road and inner City Car Parking

Again, this is an idea which has not been consulted on. The previous proposals (known as the SWECO report) were far better. That would still have the effect of making journey times longer on the ring road, and thus disincentivising travel into the City but without making it impossible. Given that the evidence is that only 13% of vehicle movements on this road are for journeys through the City, implementing the SWECO proposals would enhance non-vehicle based travel options and the ambience of the area around the City walls, while also cutting traffic.

The current proposals to close many of the inner City car parks would further promote changes to travel patterns, but again the impact on, for example, the Marlowe theatre and City businesses in general has to be considered. It is not at all clear that this has been done.

2.3.3. Untested options

Proposals which are so far-reaching and with such a significant effect on the population of the City in particular should have been rigorously tested and modelled, with a series of options tested in an iterative way, as proposed below.

However, it seems that Kent Highways did not undertake or procure modelling of any solutions other than the one they have ended up promoting. In other words, it appears that the outcome was determined before any investigation of the options was carried out. On that basis, this Local Plan proposes almost £300 million pounds of capital expenditure on road based traffic measures. These ignore other ways of addressing the movement of people around the District and take no account of possible modal shift if a different combination of solutions were created. The Paper seems to assume that because measures to create modal shift have failed to date then the conclusion that should be drawn is that there will be no modal shift in future. That conclusion rests on an assumption that any serious measures have been taken by the Council since 2017 to promote or incentivise modal shift. In fact, this Council has done almost nothing to support modal shift. That may be because, among other things, the Council is highly reliant financially on income from car

parking in the City and town centres. To assume that more active policies in future cannot achieve modal shift is inexcusable: the paper should have looked more closely at, and modelled, options for policies which would achieve a change in behaviours.

The key challenge over the life of this Plan will be congestion rather than pollution. Although pollution from vehicle movements will never be zero, the phasing out of internal combustion engine vehicles over the life of this Plan will mean that air quality will improve radically. Thus the core problem to resolve is the quantity of vehicle movements. To that extent, although Low or Zero-emission zones might impact pollution, it is not clear that the long term benefits outweigh the costs. Nonetheless this option should have been, and should be, properly modelled rather than ignored.

A greater emphasis on preventing heavy vehicle movements into the City is required, perhaps with the creation of Freight Transfer Stations in consultation with City businesses. The same option might also be applied to Whitstable town centre. Again, these options should have been modelled.

Public transport seems to have been almost completely ignored in the Traffic Topic Paper, other than to make the assumption that bus routes would be run solely by commercial operators and only at times when they could make the service viable. This is no basis for a radical change in behaviours, and as set out below this is a fatal omission which must be rectified.

2.3.4. Alternative options

The aims of the Transport policy – regardless of how many homes are built or where – should be to:

- Create viable, safe, regular public transport and personal travel (walking/cycling etc.) options
- Create disincentives to travel by car – probably including raising parking charges significantly, possibly bar cars from some routes at some times to allow bus lanes to be installed etc.
- Thus effectively to penalise unwarranted car use (but allow legitimate blue badge holders to park conveniently and allow movement of emergency vehicles, commercial travel, freight)

Therefore the following options should be modelled in an iterative fashion so as to understand the cumulative impacts.

Option 1: do nothing at all on transport, but add the planned housing numbers to create a baseline “worst case” for 2045 (this has already been done according to the Transport Topic Paper)

Option 2: Add the Eastern By-Pass but change nothing else

Option 3: Without the Eastern By-pass:

- carry out the changes to the inner ring road per the SWECO report
- close all the car parks inside the inner ring except Whitefriars and Castle Street
- add the multi storey on Holmans Meadow / Dover Street (but note that it is agreed that the Council must find a solution for residents within the City centre to park conveniently)

- convert Queningate, Castle Row, North Lane and Northgate to Freight transfer stations and P&R bus drop off points
- add planned P&R capacity (including Whitstable)
- add inner “hopper” bus service connecting those drop-offs plus East and West stations and Riverside.
- Create a comprehensive integrated network of cycle routes around and through the City

Option 4: option 3 plus:

- free P&R for registered residents of the District
- additional commercial bus services to connect routes around the City, especially to (1) K&C hospital; (2) London Road Estate; (4) University of Kent; (5) the outer retail hubs at Wincheap and Sturry Road; (6) Thanington / Cockerling Road; (7) all the south Canterbury new housing estates planned to 2045
- Bus services should run 364 days per year, minimum of 6.00 a.m. to 12.00 midnight. Frequency to be minimum 10 minutes between 0730 and 2000, and 30 minutes outside those hours.
- Penalise (presumably by taxing) private commercial parking spaces (e.g. at offices)

Option 5: option 4 plus free bus travel around the City for registered residents and under 16 year olds

Option 6: option 3 plus the Eastern Bypass

3. Strategic Plan: spatial strategy

For ease of analysis, the following sections reference policy statements made in the Draft Local Plan with comments on those statements. As before, I have only commented where I think that the policies might be improved. Much of what is proposed is good or excellent.

3.1. Summary

Consultation document	Comment
<p>The Canterbury District Local Plan (2017) established a strategy to 2031 and set out plans to support housing and job growth, improvements to the district’s transport infrastructure and policies to manage development within the district.</p>	<p>Maps of the 2017 site allocations are only provided where they overlap with 2022 proposals. There should be a whole District map showing both to give the context for the new proposals.</p>
<p>A number of factors have changed since its adoption; national policies have increased the level of housing growth the government expects in our district, structural changes in the retail and leisure sectors have been accelerated through COVID-19, affecting our city and town centres, and the need to respond to the impacts of climate change has become more urgent internationally, nationally and locally.</p>	<p>Housebuilding is currently struggling to achieve 900 p.a. despite there being adequate land supply - so why is this Plan based on 1252 being achievable <i>in addition to</i> the existing targets? What risk does this introduce if the Council “borrow to build” but housebuilding undershoots the targets?</p>
<p>Preparing a new local plan for Canterbury District is very much a collaborative effort - the council can’t do it alone. The process began back in 2019 and since then we’ve had ongoing discussions, consultations and conferences with our communities and key stakeholders to inform the development of the Local Plan. This included our “Issues” consultation in 2020 and our “Draft district vision and Local Plan options” consultation in 2021.</p>	<p>This Plan is NOT a collaborative effort - Opposition Councillors have been excluded from all discussion about it since the 2021 consultation concluded – and this statement should be removed.</p>
<p>This Local Plan therefore sets out a bold vision for managing growth in the district to 2045 - responding directly to these often competing priorities, and</p>	<p>“a bold vision” is a value judgement not a fact, and it should be removed</p>

<p>provides a strategy for high quality growth which can deliver decisive improvements to our district's infrastructure while protecting and enhancing our unique natural and historic environments.</p>	
<p>The district of Canterbury is situated in east Kent, in the south east of England, and had a population of 157,400 at the time of the 2021 census.</p>	<p>The population of Canterbury District is 157,400, whereas that of Ghent is circa 500,000. This is just one of many ways in which the two cities are not in any way comparable. Using the Ghent experience and solutions a basis for any decisions is fatally flawed.</p>
<p>Herne Bay has seen significant change over recent years and was a focus for housing development through the Canterbury District Local Plan (2017).</p>	<p>To say that Herne Bay "was a focus for housing development [in 2017]". This is simply untrue. Whitstable, Sturry & Canterbury had more housing development sites in the 2017 plan.</p>
<p>With growth comes investment and this plan provides our district with the opportunity to manage this growth in an effective and sustainable manner in order to:</p> <ul style="list-style-type: none"> • improve access to high-quality housing for our communities • improve infrastructure for all • enhance our city, town and village centres • increase biodiversity and the connectivity of our habitats and open spaces • respond to the challenges of climate change 	<p>"improve infrastructure for all" is unsubstantiated in this document. In fact, most existing communities and residents do not benefit from the infrastructure improvements within this Plan</p>

3.2. Strategic Plan: strategic objectives for the District

3.2.1. Missed opportunities

Missing from this vision is any sense of a solution to the long terms needs for housing at social rent or at below market cost. In particular, there is mention in the vision of the role the Council might have in meeting those needs through the provision of publicly owned and managed housing. There are many options which other authorities have trialled and shown to work, as well as the traditional council housing model. This must be addressed because the Council owns two substantial sites in the City (at Wincheap and Military Road) and some smaller ones elsewhere which could be used to provide such housing.

A more considered and active approach to the City Centre is required. It is obvious that the demand for retail space is reducing rapidly, and the Local Plan cannot rely on a continuation of schemes to regenerate existing large vacant sites with more retail units as the only way forward. There needs to be flexibility and resilience built into this Plan, not a hope that things will continue as they are. Provision to redesignate “fringe” shopping zones for residential use (which would in any case constitute a reversion to historic use in many cases) need to be considered, along with the impact of allowing leisure usage to spill into residential areas. The protection of the historic City centre is of course also essential.

3.2.2. Responses to the draft Policies

Consultation document	Comments
This plan sets out a positive vision for the future of our district which responds to these challenges and has been developed through early and ongoing community and stakeholder consultation on the new Local Plan	“ a positive vision” – again, this is a value judgement not a fact
Provide high-quality housing for everyone, including affordable housing, as part of mixed, sustainable communities. Ensure housing is of high-quality design, is low-carbon and energy and water efficient as part of healthy communities with access to community facilities and open space.	“High-quality housing” remains undefined
Support the growth and development of our universities as a centre of innovation and learning excellence, which stimulates business start-ups and generates skilled jobs.	Where is the proof that Universities will grow? Where are their plans? How will they grow physically, and where?
Create a transport network with a focus on low-carbon travel to improve air quality and people’s health while ensuring excellent access to city and town centres on foot, cycle and by public transport including through intelligent transport systems.	This objective is not supported by anything later in the detailed plans
Take advantage of and improve our links to and from London and the Continent, while creating a transport network which enables most residents, particularly those in the urban areas, to access their day-to-day needs within	“15 minute” concept is not addressed anywhere in the master planning. This concept is important not only for new developments but also to enhance existing communities.

15 minutes through healthy, environmentally-friendly journeys.	
Support the sustainable growth of our rural communities through the provision of affordable housing, community facilities and transport infrastructure while taking advantage of opportunities to grow the rural economy.	This statement is not substantiated anywhere
Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses.	Heritage & culture issues are on briefly addressed in policy DS26, but are critical to the character of the City in particular (but not exclusively) and to the district's economy. There should be much more emphasis on how physical development – both housing and the universities – and economic development are linked with heritage and cultural assets and with tourism development.
Positively exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses while ensuring critical infrastructure is delivered at the right time to support development	What does “positively exploit the delivery of infrastructure” actually mean?
Create accessible vibrant town centres, maximising digital connectivity for residents, visitors and businesses to shop, stay and enjoy their leisure time	This fails to address significant long term changes in retail behaviour and there is no explanation of how this is to be addressed.

3.3. SS1 Environmental Strategy

Consultation document	Comments
Provision is made for a range of new open spaces and sports and recreation facilities including	Assumes “open spaces” and “sports facilities” provide equally benefit to the environment. They do not.
two new country parks for the district: a. 440ha Broad Oak Reservoir Country Park; b. 50ha Womenswold Country Park.	Country Parks – why is there no mention of Old Park / Chequers Wood? What protection is proposed for green spaces in the urban areas from infill building?
Development across the district will need to incorporate measures to deliver a minimum 20% biodiversity net gain in line with Policy DS21, having regard to Biodiversity Opportunity	What is the benchmark date against which biodiversity net gain will be calculated? Who is measuring this, and using what metrics? This should not involve biodiversity offsetting to areas outside of the Canterbury district, or even in most cases within the District.

Areas and/or Nature Recovery Networks	
New developments of 300 homes or more should incorporate a minimum of 20% tree cover across the site and all developments should incorporate new trees and hedgerows in areas of appropriate landscape character, to help restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, help mitigate climate change and contribute to floodplain management	Why is the trigger 300 homes? (this number is used repeatedly and would seem to encourage developments just below 300 homes)
Opportunities for carbon sequestration and for the development of renewable and low-carbon sources of energy will be actively supported within all developments. Large scale carbon sequestration and renewable power generation will be encouraged in suitable locations across the district	This should define the carbon sequestration methods that will be accepted. Presently there are no large scale viable sequestration schemes in the UK.
The council will continue to work with partners to explore the promotion of a Stour Valley Regional Park and to support the extension and improved connectivity of the Blean Woodland Complex	This is meaningless because there is no commitment of funds or specified timescale, not does it specify which partners.

3.4. SS2 Sustainable design Strategy

Consultation document	Comments
New development should be designed to achieve net zero operational carbon emissions, should make efficient use of land and should be designed to maximise energy and water efficiency	Net zero operational emissions is good. But is there any reference to or consideration of carbon used in construction and how that can be reduced?
New development should be responsive to the distinctive character and history of the district including the surrounding townscape and landscape setting, while incorporating appropriate innovation or change, such as in scale, form and density, and creating inspiring new buildings and places	How is “responsiveness” to be assessed?
Architecture, landscape and public realm must be attractive and function well, establishing or contributing	How are “attractive” and “function well” to be assessed?

positively to a sense of place, using the arrangement of streets, spaces, building types, form and high-quality materials to create welcoming and distinctive places	
New development should contribute towards sustainable, complete and compact neighbourhoods with high levels of connectivity and appropriate mixes of uses and densities and be adaptable to climate change and future uses	How is connectivity delivered by the specific development sites within the area plans? Each one appears to be separate with no obvious planned connectivity at all. There ought to be clearly planned and specified connections if this is to achieve the aims of the Plan.
All developments should ensure appropriate connectivity by walking and cycling to nearby community facilities and services	“appropriate connectivity” is undefined
New communities of more than 300 homes should contain comprehensive and accessible community hubs to reduce the need to travel for day-to-day services and facilities. Community facilities and services such as healthcare, education and shopping and employment uses should be co-located at the heart of new such developments, within or next to the community hub and provided early within the development	Unless every development of more than 300 homes will have the facilities listed, how can they be co-located? What does “early in the development” actually mean in practice?
High quality, accessible open space should be delivered in line with Policy DS24, and be incorporated into proposals with appropriate layouts, sizes and distances from highways to promote healthy lifestyles	“High-quality .. open space” is again undefined
This includes... integration of food growing opportunities at all scales such as planters, fruit trees, hedgerows, community orchards and allotments	The scale of “food growing opportunities” should be defined in relation to scale of development
natural and semi-natural greenspaces connecting communities to nature by supporting wildlife conservation, biodiversity and environmental education and awareness and spaces	“natural”: and “semi-natural” greenspaces are undefined

providing opportunities for informal recreation by the whole community	
New communities of more than 300 homes will require a masterplan, prepared in collaboration with the community and be subject to a design review during the design process, prior to submission of a planning application. Design codes will be required as a condition for multi-phased developments. They should be developed through effective community engagement and reflect community aspirations for development in the area	Again: why is the trigger point 300 homes? Which “community” should be consulted when sites are this large? What does a “design review” entail? All these issues must be identified if the Plan is to provide any meaningful engagement with existing communities.

3.5. SS3 Development Strategy

Much of the Policy statement is not about strategy at all, but instead references specific developments which are also dealt with under the areas development policies. This is confusing and could lead to unintended contradictions. Site specific policies should be removed from this section and placed with the sites they refer to.

Consultation document	Comments
This plan has been informed by key evidence such as the district’s Housing Needs Assessment (2021), the Economic Development and Tourism Study (2020, 2022) and the Retail and Leisure Study (2020, 2022) which provide an objective analysis of the district’s development needs through to 2045	It would be helpful if documents referred were hyperlinked. There are so many background papers that the ordinary reader will not be able to cross-reference and cross-check these.
Development allocations within this Local Plan are therefore in addition to those sites and are intended to ensure that there is sufficient land available to meet development needs over the full period of the plan to 2045	If this plan is in addition to 2017, what are the cumulative totals in each ward?
The council continues to work closely with its neighbouring authorities on a range of strategic planning matters and has established mechanisms in place to ensure effective and ongoing cooperation and joint working on cross-boundary strategic matters	What is the involvement of Councillors and Parish Councils in these mechanisms?
The district Settlement Hierarchy establishes the different role and	What is the purpose of the settlement hierarchy?

<p>function of settlements across the district and is informed by the Canterbury District Rural Settlement Study (2020)</p>	
<p>In line with the council’s vision for growth, this plan focuses growth proportionally at the most sustainable settlements within the district and, taking account of the responses to previous consultations, also identifies land for a new Garden Community on the eastern side of the district at Adisham Road</p>	<p>Who has judged which are the “most sustainable settlements”? Who was consulted on this?</p>
<p>Reflecting the outcomes of previous consultations, this plan proposes designated settlement boundaries at the most sustainable rural settlements - the Rural Service Centres and the Local Service Centres</p>	<p>Where are these set out?</p>
<p>Between 2020 and 2045 provision is made through the granting of planning permission and the allocation of sites for:</p> <ul style="list-style-type: none"> • • 38,480 sqm floorspace for office use; • 52,030 sqm floorspace for light industrial use; • 15,270 sqm floorspace for general industrial use; • 66,440 sqm floorspace for warehousing use; • 414sqm floorspace for convenience retail use; and • 5,290 sqm floorspace for comparison retail use 	<p>What is the basis for the targets for office, light & general industrial, warehousing, and retail use?</p>
<p>Canterbury city centre will continue to be the primary commercial, leisure and tourism centre in the district, complemented by the edge-of-centre Commercial Areas at Wincheap and Sturry Road, with university-related development focused within campus boundaries. Policies C5 and C11 sets out the allocation of two Strategic Development Areas at the edge of Canterbury Urban Area</p>	<p>Wincheap should be designated for housing not commercial use, or at least a mix.</p> <p>It is wholly illogical to impose cross-City car travel restriction and then put out-of-town retail in just two locations.</p>

Whitstable Urban Area and Herne Bay Urban Area will be the secondary focus for development in the district. New development will be supported on suitable sites within these urban areas	Contrary to this statement, there is almost zero development proposed for Herne Bay
A new Garden Community Broad Location is identified at Cooting Farm, Adisham Road which will provide new homes, jobs, services and infrastructure	This now seems to be undeliverable since a substantial part of the landholding is not available for development. This throws into question the entirety of the development in the areas covered by Policies R1, R20 and R22 – which, incidentally, should be looked at as a single development.
Sturry, Blean, Bridge, Chartham, Hersden and Littlebourne are identified as Rural Service Centres	None of this seems to take into account the “15 minute access” policy.
Adisham, Barham, Broad Oak, Harbledown, Hoath, Lower Hardres, Petham, Rough Common, Stuppington, Westbere and Wickhambreaux are identified as Local Service Centres ...	Several of the locations listed have absolutely no existing community facilities or services (Adisham, Petham, Stuppington), while some have only a pub (Westbere, Broad Oak, Wickhambreaux).
<p>Within the countryside ... priority will be given to protecting the rural character of the district.</p> <ul style="list-style-type: none"> • In this context, new housing development will only be supported in very limited circumstances and new community facilities, business space and tourism facilities will only be supported where the need for the development outweighs any harm. • Existing community facilities and services within the countryside will be protected 	Why is any housing at all banned in these areas when almost identical land is to be built on around Canterbury fringes?

3.6. SS4 Movement and Transportation

Where is the cost detail for this key section of the policy?

Consultation document	Comments
The NPPF, along with the Transport for the South East’s Transport Strategy, the Kent and Medway Low Emissions Strategy and the emerging Kent Local	This paragraph correctly identifies the problem, but fails to explain why building homes elsewhere so as not to pile more pressure on Canterbury is not part of the solution

<p>Transport Plan 5, all point to the need to facilitate a significant shift in modes of transport from private cars to sustainable travel options, to reduce the air quality impacts and carbon emissions associated with transport and to enable people to make active travel choices which can support their health and wellbeing. Achieving these objectives however will require new infrastructure, which is particularly challenging within Canterbury due to its historic environment</p>	
<p>Through the development of this plan, the council has worked collaboratively with Kent County Council as Highway Authority, and with other transport infrastructure providers, to develop a new movement and transportation strategy which aims to unlock further growth in the district while facilitating the delivery of enhanced sustainable transport infrastructure to enable this significant shift in travel modes - the Canterbury Circulation Plan</p>	<p>Refers to “other transport infrastructure providers”. Who are these?</p>
<p>The Canterbury Circulation Plan focuses on the upgrade and provision of new sustainable and active travel routes through the reallocation of road space on the inner ring road to provide segregated space for walking, cycling and buses - with connectivity along the key radial routes into the city and the division of the city into neighbourhood sectors to limit cross-city trips. This is facilitated through the provision of road links at the outskirts of the city, to provide connectivity between the A28 at Sturry and the A2 at Bridge, and between the A28 at Thanington and the A2 at south Canterbury, which will create new points at which to access the city by car. The Transport Topic Paper (2022) sets out the key principles and components of the Canterbury Circulation Plan which has been subject</p>	<p>Fails to explain why areas north of the City don't need connectivity (which they actually do) or where the evidence for any of these proposals can be found.</p>

to strategic traffic modelling through the Kent County Highways Model	
<p>Outside of the city, the Local Plan identifies a series of improvements to highways and sustainable transport infrastructure needed to support growth, including the provision of new A299 junctions and a park and bus facility at Whitstable. The plan sets out a clear hierarchical approach which requires developments to prioritise provision for sustainable transport while still ensuring that adequate infrastructure for private cars, including electric vehicles, is delivered as part of new developments in the district</p>	<p>Why does this document use the phrase “park and bus”, which no-one knows, instead of “park and ride”? Aren’t cycling and walking from these locations an option?</p>
<p>Working with partners, including Kent County Council, the council will deliver a comprehensive programme of sustainable transport infrastructure measures to improve neighbourhoods, accommodate new growth and to facilitate a significant shift to low-carbon and active travel journeys, particularly for short trips</p>	<p>Since KCC haven’t consulted local residents at all on the impacts of the plan, they are not “partners” in any meaningful sense. This failure to consult renders their contribution to the transport planning worthless.</p>
<p>A new Canterbury Circulation Plan (CCP) will enable the reallocation of road space on the inner ring road for active travel journeys and faster, more reliable public transport to remove congestion, improve air quality and enhance the city centre environment and its heritage</p>	<p>The original basis for this (the Sweco report, which was widely praised) did not envisage closing the inner ring road to cars. That concept has never been discussed or consulted on. In our view it is not viable to do this.</p>
<p>Key infrastructure requirements of the CCP include:</p> <ul style="list-style-type: none"> • The relocation of key city centre car parking to locations outside of the inner ring road; 	<p>No indication of the quantum of parking to be provided, or how this is consistent with reducing short car journeys. There is no mention of whether an MSCP at Holman’s Meadow is acceptable to neighbouring residents or how it is to be funded, or how such a development aligns with the desire to significantly reduce car journeys into the City.</p> <p>What will be done with the existing Whitefriars MSCP? Where will inner city zone residents park? How will inner city residents exit their zone without crossing a boundary?</p>

<ul style="list-style-type: none"> The delivery of a comprehensive city-wide network of segregated cycle lanes and cycle parking infrastructure, with links to the coast and rural areas 	<p>Cycle routes are not adequately linked together, nor properly segregated from other transport modes</p>
<ul style="list-style-type: none"> Improved public transport connectivity across the city, with bus priority measures and enhanced park and ride infrastructure, and upgrades at Canterbury West and Canterbury East railway stations; 	<p>There is no point in providing bus priority measures and imposing the zoning scheme if there aren't significantly more buses running more frequently at ALL times of day at little or no cost to users. Modal shift (scarcely mentioned in this plan) will not be achieved just by making car travel more difficult, which seems to be the sole lever being used. There appears to have been no modelling of the impact of modal shift or of options to discourage car use and encourage public transport use, with the result that there appears to be an assumption that buses will be running on roads that are no less congested than at present. This is a major failing in the modelling which renders the conclusions and proposals based on it useless.</p>
<p>Delivery of "shared streets" within existing neighbourhoods to improve neighbourhood environments and support active travel journeys</p>	<p>What are "shared streets"?</p>
<p>The delivery of enhanced road infrastructure to improve connectivity, facilitate alternative access points to the city, and enable the delivery of the measures at (a)-(f) including:</p> <ul style="list-style-type: none"> upgrades at the A2 junction at Harbledown and at Rough Common Road; 	<p>Dropping the Western bypass may be politically convenient, but proposing to use Rough Common Road as a major through route is ludicrous. It runs through residential areas and past a school; it has some very narrow and steep sections; there is no space to widen it consistently; and there is no evidence that traffic needs to use it – unless a zonal system is imposed. In other words, using this route is an ineffective solution to a problem which does not currently exist and which is entirely created by the proposal for zoning within this plan.</p>
<ul style="list-style-type: none"> new A2 access to the Kent and Canterbury Hospital and links to the A28 at Thanington; and 	<p>Where is there space for a "new A2 access" to the K&C? This doesn't seem to be shown on any map or plan, though it is described in policy C10</p>
<ul style="list-style-type: none"> a new movement corridor to connect the A28 at Sturry with the A2 at Bridge. 	<p>The Eastern bypass is a single carriageway road. If it is to have a significant impact on traffic volumes in the City, then presumably it needs to be large enough to carry the displaced journey. So either (1) the road isn't large</p>

	<p>enough or (2) the traffic volumes are not significant enough to justify the cost.</p> <p>In addition, KCC Highways claim that the route shown on the plans is not definitive (a point raised in the previous consultation). That makes consulting on it pointless since there can be no meaningful responses from residents. Nonetheless, the route is highly contentious. It seems to cross the South Canterbury development, which is not in the approved master plan for that strategic location. It crosses at least two important archaeological sites, several holes of the Canterbury golf course, and the Sturry Road Community Park, as well as impeding access to Fordwich from the south. Where it runs along the course of the Lampen Stream it is likely to result in pollution of the stream from run-off from the road surface. It is a nonsensical route that still requires traffic to transit Sturry and Hersden, meaning that all it will achieve is to shift the location of traffic congestion.</p>
<p>The council will continue to work with partners to improve public transport connectivity in the rural areas and to maximise opportunities to improve walking and cycling routes to connect rural settlements with each other and to the urban areas within the district</p>	<p>How will this be done? Connecting rural settlements to each other for walking is not a useful solution for most inter-community rural travel.</p>
<p>New development should ensure easy and safe pedestrian and cycle connectivity is available, including segregated cycle lanes where achievable, with high levels of connectivity to the wider network, including within and between neighbourhoods</p>	<p>Unless the “wider network” of cycle routes is clearly set out (which it isn’t in this Plan) this is no more than wishful thinking</p>
<p>Walking, cycling and active, low carbon, sustainable transport modes (such as public transport stops) should be prioritised in line with Policy DS13, over private cars with traffic speeds limited within new neighbourhoods</p>	<p>Isn’t it a safe assumption that traffic speeds will always be limited in residential areas? All new residential streets should be limited to 120 m.p.h.</p>
<p>New development should be designed to help improve the air quality of the district as a whole</p>	<p>This is a meaningless statement without some specifics on the features expected of new homes which will help achieve this aim.</p>

3.7. SS5 Infrastructure Strategy

This section would be more accurately named “Community Infrastructure”.

The section contains no specific details on mechanisms, timings, trigger points or funding. It is almost impossible therefore to assess it or comment on it.

Consultation document	Comments
Six new primary schools ...	This repeats several points made previously

The policy repeatedly talks about “appropriate mechanisms” without any clarity on what those may be, or who will decide or who will provide the mechanism.

8. District Wide Strategic policies

8.1. DS1 Affordable housing

8.1.1. Preamble

(2-4) These statements fail to present the scale of the unaffordability problem in quantum or value terms. This means that measures proposed cannot be assessed for the contribution they may make to solving the problem. This should be resolved.

(3) There is a need for housing at prices *below* the technically “affordable” level, which is not mentioned at all. The housing needs of the District cannot be addressed without an honest assessment of the ability to pay of people waiting for housing.

(3) This also says that developments should “continue to provide at least 30% affordable housing”. Is there any evidence that 30% has been achieved on current developments?

(4) Student accommodation does nothing to create affordable housing for residents and should not be included in this section.

8.1.2. Commentary

Nowhere in the Plan is a commitment to, or provision for, additional social housing or Council-owned housing. The failure to distinguish between the statutory definition of “affordable” housing and these other means of provision is a serious shortcoming which inhibits the Council’s ability to ensure adequate development of additional housing which is within financial reach of many residents, including those on the already substantial housing waiting list.

There are a number of specific shortcomings in the basis for this policy:

- The data used to calculate the Local Housing Need needs updating. It identifies 2,503 people on the housing needs register as of January 2021, but 2,800 as of October 2021. There is a six month wait before applicants are assessed. The Council’s figures cannot therefore be relied on as a basis for the calculation.
- The local affordability ratio used in the calculations has already changed during the consultation period (increasing from 11.19 to 12.82) but might also increase again if they change the means of calculating the extent to which students stay in an area.
- It is pointless to use data suggesting that 59% of private renters aspire to become home owners as part of the means by which established the housing need, when it is acknowledged that over 90% of private renters are unable to qualify or pay for four of the five affordable home ownership options.
- “Affordable” rent levels in the plan are unaffordable for the vast majority of local people. 34% of newly forming households can’t afford the affordable rent levels set out here. It is not a straight choice between affordable housing (80% of market rate) and a social housing rate. There needs to be a ‘Canterbury Rate’ determined at 30% of mean household disposal income, or linked to a National Living Rent. 50% of the net annual affordable need is for socially rented housing and yet there is nothing in the plan which addresses this.
- Whilst the price of paying a Canterbury or social rent may jeopardise the viability of sites that is not a good reason not to model the impact for assessment. The Council

should simultaneously bring forward a plan to use its own landholding to supplement social housebuilding through a special development arm on its brownfield sites

- Not all affordable home ownership options are equally accessible. Home to Buy with a shared ownership buy in of 50% requires an average household income of £60,419 compared to a 25% buy in of £50,790.
- The current plan doesn't model anything more than 30% affordable housing. As a result it is impossible to judge whether the existing sites (or greenfield sites specifically) could sustain more affordable housing than that.

8.1.3. Policy DS1

1. Says "will provide" when it should say "must provide". It would help if the mechanism for assessing viability was explained somewhere. Non-viable sites should be able to be rejected rather than have the affordability requirement watered down.

2 (a) This ought to make a specific distinction between social rent and affordable rent, with proportions clearly set out

2 (b) What if the Government's "First Homes" policy is abandoned during the life of this Plan?

3 What are the percentage figures stated a proportion of?

4. There should be no provision for off-site financial contributions since the Council has no sites available on which to replace the avoided affordable housing allocation

5. Why only in the AONB?

6. Quality is (again) not defined, nor is it stated who is to be the judge of this.

8.2. DS2 Housing Mix

8.2.1. Commentary

Despite the progress made with the detailed housing mix in this plan there are still a number of groups outlined in the Housing Needs Assessment who have been ignored. These include:

- Older People. DS2 states that the Council want between 10-15% of homes to be M4 standard (single story, wheelchair accessible with wet rooms) but this would deliver between 1000 – 1350 properties when the Housing Viability Assessment acknowledges that by 2040 an additional 2,200 homes could require some form of adaptation, predominantly as a result of older age population growth. The Older People's Supply Recommendations (HOPSR) toolkit suggests the District will need a minimum of 576 age exclusive housing stock units in this time and a further 400 for wheelchair users. Rightsizing of homes is far cheaper than encouraging people to downsize so a clearer target is needed.
- Self-build. There is currently need for 48 plots on the Council's self-build register and only 8 plots identified. The Council should designate 5% of plots for self-build on sites over 200 homes.

1. What is meant by “sustainable mixed communities”? The term needs to be defined to have any impact.
2 (a) (b) What does “closely aligned” mean in practice? How will it be enforced?
2 (c) How can flats meet this requirement?
4. “Must consider” is meaningless and is totally unenforceable.
5. Technical specification terms M4(2) and M4(3)– what does this mean in practice? Why is it not explained?

8.3. DS3 Estate Regeneration

This Policy is unnecessary. If it refers to Council or social housing providers who may wish to regenerate their estates, then it should say so in order that this is clear. But even then, those providers will be bound by the requirements of the remainder of the Local Plan.

So far as the Council is concerned, it is not the role of the Local Plan to create new Council Policy as to its housing stock provision, maintenance or renewal, provided that the Council conforms with the planning policies in place.

Further, it is unclear how regeneration is intended to be funded. It reads as if the Council might sell off the estates and not adequately re-provide social housing. That’s unacceptable. If it is not the intention of the Policy then it needs either re-writing or, which would be our preference, removing altogether.

8.4. DS4 Rural Housing

Consultation document	Comments
2. Planning permission for isolated dwellings in the countryside will only be granted if one of the following circumstances apply... a. For a new dwelling where: The design of the development is truly outstanding ...	Who will judge what is “truly outstanding”? Why is this considered a valid criterion for building in a location which otherwise would not be permitted?
d. For Rural Workers Dwellings ...	Shouldn’t there be constraints on how long these dwellings have to be used by rural workers before they can be re-purposed for ordinary housing?
• Where appropriate, it should be sited in association with existing groups of farm buildings.	What does “where appropriate” mean? Who will decide?

8.5. DS5 Specialist Housing Provision

Consultation document	Comments
3. Proposals for purpose-built student accommodation within higher and further education campuses will be supported. Where this is not achievable, proposals must be located within a 10 minute walk of the relevant	Why is there provision for “exceptional circumstances” to allow evasion of the prior stipulations?

campus. In exceptional circumstances , where it can be demonstrated there are no suitable alternative sites, highly accessible locations may be considered.	
4. Proposals for purpose-built student accommodation must: <ul style="list-style-type: none"> • Demonstrate that any existing use for employment, commercial, leisure or other main town centre uses is no longer viable; 	Who will judge viability and on what basis?
4.7 Be a car free scheme, which provides sufficient levels of high quality cycle storage	Define what is meant by “car free scheme”
4.8 Ensure parking requirements on site are kept to the operational minimum ...	If it’s car free there should be no parking other than “drop off”
4.9 Be well-designed, providing appropriate space standards and facilities and capable of being adapted in the future to alternative residential use	Define “well designed”, “appropriate space standards” and what “future alternative residential use” requirements are/ will be.
5. Temporary use of purpose-built student accommodation during vacation periods for ancillary uses including tourist accommodation will normally be supported	This undermines our other tourist accommodation providers. In any case, “temporary” should be defined.
6.The loss of existing purpose-built student accommodation will be supported where... <p>3. It can be demonstrated that adequate access and parking provision can be provided for the proposed use(s).</p>	Why would the Council allow the introduction of parking provision in a previously car-free location?
7. In considering applications for seasonal, temporary or permanent use of land by Gypsy and Travellers ...	Should the Policy define who meets the criteria for “gypsy and traveller” communities? This is open to abuse.
... planning permission will be permitted if the following criteria are met	Also says “planning permission will be permitted” – surely that’s a Planning Committee decision not an outcome to be prescribed?
7.2 The site is capable of being provided with on-site services	“Is capable”? Surely “must be provided with”?
8. Build to rent schemes (whole section)	Do elements of this need enhancing to protect tenants’ rights?

8.4 30% affordable or social rent housing is provided as part of the scheme	This section again mixes affordable and social rent. That needs to be separated.
9, Planning applications for serviced plots for self and custom build housing must be accompanied by ... bullet 2: Evidence of local need...	Why is evidence of local needed for this?

8.6. DS6 Sustainable Design

The raising of housing standards is good, as is the new focus on sustainable design. However it is important that the Council consults widely on the process for whole life carbon assessment and the process by which schemes can access the Carbon Reduction Fund.

Smaller developers have less strenuous standards in terms of both water quality and carbon neutrality. That ought not to be acceptable.

The Plan should set the cost per tonne of carbon to be paid to the Reduction Fund if the required standard is not met.

1 (c) Why is an opt-out from this proposed? There should not be an opt-out.

1 (b) What's the purpose of the whole-life carbon assessment? What are the targets to be met?

2 (a) How can systems be designed to minimise usage? If a house could accommodate 8 people but only has two (e.g. a four bedroom house with two elderly residents) they would have 4 x as much capacity as a fully occupied house. That doesn't make sense as a mechanism.

4. Design codes "as necessary". On what basis, when and where?

5 (a) Are "garden city principles" defined anywhere? If so, they should be referenced.

5.(b) – (d) Isn't all that the function of this Local Plan?

6. & 7. This is waffle, not policy. The requirements are unenforceable and highly subjective.

8. There is no definition of "major" developments.

8. Why is there any provision for failing to do this?

8.7. DS7 Infrastructure delivery

3. The Policy should insist that 15 minutes is always based on walking time, not cycling. Otherwise in effect the latter will be the default, which will render walking times too long and create more car journeys.

4. Who defines "feasible"? The Plan should exclude cost based feasibility but accept spatial constraints.

5. Why does the Plan offer off-site or in lieu opt-outs? If the site can't deliver this internally then it is not viable for the District.

7. Shouldn't this specify the circumstances under which provision will be required ahead of development? Otherwise developers will always seek to defer provision.

8 a. "reasonableness" is ill-defined and will always be contentious

8 b. Developers are supposed to be risk takers and this is a business risk. It should not be possible to avoid responsibilities in this way.

8 c. This should remove the whole development from the Plan (or remove planning consent) not just relax or dispense with the requirements for adequate infrastructure.

9. This is just a source of constant argument and cost to the Council. If developers can't build then they should lose planning consent within a specified period of time.

8.8. DS8 Business and Employment Areas

1. These all seem to be existing locations. Is there no new economic or business development hub proposed?

5. Says "will be supported" but ought to say "will be considered" (as per previous notes)

5. re home based businesses: The Plan should define "unacceptable harm". There ought to be some constraint on the types of activity that are acceptable.

6. The Plan should provide mechanisms for redesignating some of the City centre areas for housing so as to gradually consolidate retail within the core? There is a need to define what is meant by "high quality" office space, especially in legacy or existing properties.

7. This depends on Fibre broadband being reliable, accessible and affordable. That may not be the case in rural locations where many of the business parks are. Who is responsible for ensuring that?

8. this is good, but again why is there an ability for developers to opt out?

8.9. DS9 Education and associated development

1 b. Business and commercial accommodation is NOT educational use. It should not be covered in this Policy section.

1 c. This makes no sense in terms of educational need . Indeed it restricts space for educational development and imposes business and commercial development as a requirement for University growth. That is neither necessary nor desirable.

4. How will "suitable locations" be assessed?

5.2 "Reasonable" is used again. This is a judgement not an objective criterion on which decisions can be based.

8.10. DS10 Town Centres and Community Facilities

Town Centres and Community Facilities are two entirely different aspects of the Plan. They should not be conflated and covered in a single policy, but in two separate policy sections.

The need for community venues is shown through a survey of Parish Halls but this completely omits the venues in the unparished urban areas. That must be rectified.

1. The list of commercial centres seems vague. It would help if the maps were attached or referenced.

2. Uses "High quality" as a criterion, again

3. Why is the Council considering allowing this?

3 b. It is unclear what this means in practice?

3 c. How will the Council know if the transport provision comes towards the end of the Plan period?

4. Why would the Council ever allow this?

5. "Will be" supported – as noted previously, this should say "will be considered"

6 a. this contains too many subjective phrases like "vitality", "viability"

9 d. What constitutes a "small part" of a site? This should be defined.

8.11. DS11 Tourism Development

There is a disconnect between this policy and the result of the Economic Development and Tourism survey, which shows a massive increase in AirBnB's but a residency rate relatively similar to self-catered accommodation. This suggests that AirB'nB properties are essential to the economic development of tourism. There is also very little clarification as to what might be deemed to be overconcentration of short term lets, and how this would relate to areas where arguably this threshold has already been exceeded. It would be preferable that a system of licensing be introduced to regulate the number and location of such properties, as planning restrictions are a crude tool to solve this problem.

6. How would this be achieved? Can the owner simply shut the site for a period of time?

8.12. DS12 Rural Economy

1. "Will take a positive approach" is not a policy statement.

3. Development on this category of land should be prohibited.

8.13. DS13 Movement Hierarchy

1. The hierarchy omits commercial vehicles of all types (e.g. delivery freight and vehicles used by tradespeople) as well as emergency services vehicles and vehicles used by people with disabilities. It's unclear how this hierarchy is to be applied in any given case.

8.14. DS14 Active and sustainable travel

1. "high quality" again. Once more, this needs substantial revision where it occurs to be meaningful and enforceable.

1. How can developers "improve off-site routes"?

1. Why doesn't the Local Plan specify that walking and cycling routes should be (a) physically separate from roads; (b) well-lit when within developments; (3) directly link to adjacent existing designated walking and cycling routes?

3. The policy must define "frequent bus service" to have any meaning. This should consider both for frequency and duration of coverage across the day and week. Bus stops must provide shelter to encourage use in inclement weather.

4. The Plan cannot can't specify scooter hire or use when these are illegal.

8.15. DS15 Highways and Parking

2. "Suitable connection"? Specify.

2. One EV point per 10 vehicles is wholly inadequate for the life of this plan. Put 10/10 in from the beginning to ensure the grid infrastructure is adequate.

3. What constitutes “a significant volume of traffic”?

4. What constitutes “severe” cumulative impact?

5. This is not strong enough. It should be clarified and strengthened.

6 b. How can there possibly be non-road borne logistics in most of the district? This isn't realistic.

6 c. / 6 e. How is this to be done?

8.16. DS16 Air quality

1. The Policy needs to at least define what is meant by “major developments”, ideally at a low threshold. But this ought to apply to all developments.

8.17. DS17 Habitats of International Importance

Para 6.45 “Catchment wide strategy” presumably refers to the Stour catchment. What about the coastal area? Are there other catchments that should be specified as either included or excluded?

Policy statement:

2. “Appropriate assessment” seems to be a technical phrase. What does it mean in practice? Does this suggest that development will be permitted (or considered) if such an assessment is done regardless as to the result of the assessment? If not, the threshold of acceptance should be stated.

3. Define “significant adverse effect”.

4. Why allow mitigation rather than decline to give consent?

5. Why is there any exception at all in these circumstances?

7. Why does this talk about “new overnight accommodation”? That possible development should be covered by other Policy statements

8.18. DS18 Habitats and Landscapes of national importance

1. Define “major development” and “exceptional circumstances”

4. “Not normally be permitted” is vague and unenforceable. This needs tightening up significantly.

5. An appropriate specialist should be specifically “appointed by the Council” not by the developer

7 (a) How can such loss possibly be “clearly outweighed” by development or economic gain? The two things are in totally different categories and one cannot be weighed against the other. The Plan needs to be much stronger in ruling out development which has a negative impact on natural habitats of this sort.

8.19. DS19 Habitats, landscapes and sites of local importance

There are similar objections as to DS18. The exceptions and mitigation options undermine the whole purpose of the policy

8.20. DS20 Flood risk and sustainable drainage

2. Without a flood risk zone map this is difficult to understand. One should be provided or referenced.

3. Sequential Test? Exception Test? What forms of flood mitigation are considered acceptable? Could such mitigation not simply shift the flood risk elsewhere?

8. Why not have the same policy as for Seasalter?

8.21. DS21 Supporting Biodiversity recovery

1. Again there is no definition of what constitutes a “major development”

1 (a) The Policy must state clearly at what point in the development tree cover will be assessed

1 (b) As written, doesn't this preclude any development on greenfield sites

1 (c) This element conflates two different issues (climate change and planting of species) which are not connected

1 (e) This has nothing to do with biodiversity

1 (g) It is unclear how Public Rights Of Way (on their own) help with this

1 (h) This is very vaguely written

1 (i) Wood is not acceptable as a fuel source and should be specifically excluded.

2. “Non major development” is undefined (which is the flip side of not defining major developments). The phrasing of the statement is very poor and difficult to follow.

3. the Plan should specify at what point in the planning process the biodiversity net gain plan will be required. It should also state clearly at which point the baseline will be measured and by whom. It is important that an independent specialist assessment of the starting point is made – not one paid for by the developer – as there is an incentive to understate the starting position in order to minimise the resulting increase in biodiversity.

3. (e) There is no reason why off-site net gain, within the district or elsewhere, should be counted

3 (f) & (g) Purchased credits should not be allowed to offset site loss. Species diversity is not at all protected by this.

4 (a) it is not at all clear that it is possible to weigh these wholly different categories of loss and benefit against each other. Who will decide and on what basis?

4 (b) Mitigation and compensation options should not be available or much more tightly constrained.

8.22. DS22 Landscape Character

2 (c) It would be helpful if specific “long distance views” were set out which have to be protected, as well as the more general requirement. Other than vantage points it is unclear from where would there be long distance views – this seems a little tautological.

2 (d) The World Heritage Sites should be specifically referenced and protected, as should the environs of those sites.

8.23. DS23 The Blean Woodland Complex

It would be helpful for the boundaries of this area were shown on a map.

1. “The Council will support” is another pre-judgement and it is wrong to say this.

3. It is unclear how there could possibly be development within the Blean Woods complex that doesn’t damage the character and nature of the area. It is not clear why development would be required or permitted, and it is suggested that development in this area should be excluded.

4. Why does this specify just one part of the surrounding area?

8.24. DS24 Publicly accessible open space and sports

2 (c) 3.4 ha. is quite a large area to allow such an opt-out. Why have has the trigger criteria been changed to site area rather than numbers of homes as in other policies?

2. (c) Again, the developer should not be allowed to financially off-set the duty imposed by this policy. It also implies that provision of the relocated facilities would become the responsibility of the City Council, which seems to be wrong in principle.

3. How big “an area of the District” is should be made clear, as should how this can be managed.

5 (a) What are “all appropriate ages” ?

6 (c) It is not stated who will manage the endowment fund, and that needs to be established. It would be preferable if the Council were to establish a single fund for the whole district to be administered by the Council. This would ensure that strategic provision was made rather than piecemeal facilities being set up, and that existing communities benefit as well as the new ones. It ought to be specified how the fund starting value is to be calculated, and when it is to be established.

7. The accessibility distances don’t seem to make sense, especially the semi-natural/natural difference The acronyms used should be referenced in a glossary.

8. This contains far too many opt-out options

8.25. DS25 Renewable energy and carbon sequestration

1. The Policy says this will be “encouraged” in “appropriate locations” without setting any basis for assessing appropriateness. This ought to be defined for each type of energy source.

3 (a) It isn’t clear why the Council believes that grid utilities should have to show benefit to the District.

4. This is very unclear.

8.26. DS26 Historic environment and archaeology

1. This would rule out development almost everywhere. Poorly worded.
2. Shouldn't development affecting the wider setting be ruled out? How wide is the "setting" area?
6. Define "substantial harm"
- 9 (b) Why do trees etc have to contribute to the Area to be retained? It's a judgement.
- 9 (d) Almost all development will fall under this policy