

## **Draft Canterbury District Local Plan to 2045**

### **(Regulation 18) Consultation 2023**

#### **Response from CPRE Kent**

#### **Introduction**

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

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside.

We believe that the planning system is a toolbox for achieving better – for people, nature and the economy – while supporting the delivery of more badly-needed homes to end the housing crisis.

In general CPRE Kent supports a development strategy which meets the following criteria:

1. Brownfield first, especially in urban areas and not in rural areas where it would result in unsustainable patterns of development
2. Development should result in sustainable communities
3. Provision in rural areas where there is an identified local need and the scale of development is appropriate for the size of the settlement
4. The plan should promote development in locations:
  - a. That are well supported by, or that will support, sustainable transport and active travel.
  - b. That are well served by regular public transport services and social and community facilities, that are in safe walking and cycling distance or would support, or result in, a sustainable settlement.
5. Ensuring our unique English countryside landscapes are protected and valued for the benefit of current and future generations.

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

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

Ahead of our response, we must raise extreme dissatisfaction with this consultation. CPRE Kent respond to countless Local Plan Consultations across Kent, yet we have never encountered one which is as difficult to navigate as this one, nor accompanied by such an unwieldy and long questionnaire.

What is more, the Council has chosen to run a number of other consultations relating to the Local Plan simultaneously to the Local Plan consultation, with the consultation running over the festive period. Whilst it will be claimed the 12 weeks given is longer than that given elsewhere and point to the media attention which has been given to Canterbury Circulation Plan, this does little to counter the fact that such factors will undoubtedly have put off many engaging with the process who may have otherwise done so. It certainly is the case that our

members have visited the sites only to find nearby neighbours and local residents completely unaware of what's being proposed.

The reason why this is such an issue is we often see that the lack of engagement as a consequence of these sort of issues get overtaken by the passage of time only to later be interpreted as a form of implicit acceptance from the majority of the local population at a later date. As it is, the draft plan we are being asked to comment on today does not reflect the significantly negative public response to the previous "preferred options" consultation.

It is therefore imperative that future consultations are conducted in a manner that encourages genuine engagement from the community as a whole.

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

**1. Unsustainable strategy.**

As an overarching position, CPRE Kent wish to raise significant disappointment that Canterbury City Council (CCC) has chosen to ignore ours and others previously raised concerns continuing to persist with a spatial strategy prioritising allocation of greenfield sites ahead of brownfield sites. In particular we are concerned with the continued and unsustainable over-expansion of Canterbury taking a clearly disproportionate share of all development, along with the inclusion of an entirely new and clearly unsustainable settlements at Adisham under the guise of "garden settlements".

The reason for this strategy simply seems to be a rush and desire to meet the unjustifiable housing target as set by the standard method, along with the completely ill-conceived and out-dated concept that building new houses is necessary to fund and improve existing infrastructure deficiencies. What this strategy will actually deliver is yet more unaffordable market homes to serve an external market demand, with any promised infrastructure either watered down or removed entirely by the time the draft allocations are constructed. This seems to be the experience from the current Local Plan and there is nothing within this draft plan to convince us this would not be the experience this draft plan.

We previously called for a considerably more sustainable approach of brownfield first with distribution based on the settlement hierarchy with the focus on **sustainable** growth which is limited to need rather than demand. This call remains.

**2. The plan should be being made in line with the proposed amendments to the NPPF**

Canterbury City Council (CCC) will be well aware that DLUHC are currently consulting upon significant changes to the planning system. This includes significant and specific changes that are being proposed to immediately make to the NPPF (subject to and following consultation). The intention is for these specific changes to take effect Spring 2023. Amongst the purported aims of the changes are to:

- make clear how housing figures should be derived and applied so that communities can respond to local circumstances;
- address issues in the operation of the housing delivery and land supply tests;
- set clearer expectations around planning for older peoples' housing;
- promote more beautiful homes, including through gentle density;
- make sure that food security considerations are factored into planning decisions that affect farm land

In terms of the specific changes that it is proposed to immediately make to the NPPF, these include:

- Revising NPPF paragraph 11 so that it effectively discourages "building at densities significantly out of character with the existing area".
- Changing the test of Soundness at Paragraph 35 in a manner which would give far greater scope for strategies which do not necessarily meet the standard method housing requirements.
- Inserting an entirely new paragraph confirms that "standard method is an **advisory** starting-point"
- Inserting an entirely new draft footnote 30 which puts the focus on brownfield sites where "density should be optimised"

The simple combination of these factors is that a local plan which uses an alternative method to the standard method for calculating houses would be far more likely to be found sound against this revised NPPF. Significantly for Canterbury, the combination of the proposed transitional arrangements and CCC's proposed plan making timetable (as set out within its current LDS) mean it's entirely CCC's choice as to whether it wishes to proceed under the current system or take advantage of the flexibilities offered by the new system.

With the imminent changes to the NPPF, it will no longer be sufficient for CCC to be saying its hands are tied to committing to an unsustainable growth strategy because of needing to meet the housing requirements of the standard methodology. This is particularly so if the only way to meet the housing numbers would entail building at a densities significantly out of character with the existing area. We would suggest that seeking to build at more than double past delivery rates would represent development significantly out of character with the existing area.

**In our view, it would be a complete dereliction of duty to the residents of Canterbury if CCC does actively choose to persist under the current system with the clearly undeliverable and unsustainable growth strategy as set out within this Regulation 18 draft plan. Rather, the plan making process should be either paused or adapted so as to take full advantage of these proposed changes.**

### **3. A revised Housing Needs Assessment should be undertaken with a realistic target**

The current Regulation 18 draft plan would be committing the district to meeting a clearly unsustainable and unjustifiable arbitrary housing target as set by the Standard Method. Canterbury currently delivers an average of 572 dwellings per year, yet the emerging plan is seeking to deliver 1252 dwellings per year. This is despite Canterbury district being a significantly constrained district with the Kent Downs AONB covering 27% of the district; ancient woodland covering 15.6%; there being 2 National Nature Reserves and some 15 SSSIs, is constrained to the North by the coast (including attractive areas of undeveloped coast at Seasalter, Swalecliffe, Bishopstone and Reculver) and at its core the historic city of Canterbury with its world heritage sites and accompanying challenges this has for sustainable development<sup>1</sup>. It is our view that these significant constraints already amount to the exceptional circumstance to divert from the standard methodology. For example, it is noted that 2018 based house-hold projections suggest a baseline need of 10,917 houses over the years 2023-2043, averaging 546 houses a year. This figure far closer reflects actual delivery within the district and therefore we would suggest a better reflection of actual need within the district.

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<sup>1</sup> As described in <https://historicengland.org.uk/images-books/publications/sustainable-growth-of-cathedral-cities-and-historic-towns/sustainable-growth-cathedral-cities-historic-towns/>

Additionally, the consultation material accompanying the proposed revised NPPF suggests that a university town with an above-average proportion of students would be an example of a local demographic characteristic which may justify using an alternative to the standard method. Canterbury has one of the highest ratios of students to permanent residents in England, at 16.4%, compared to a national average of 6%. This is clearly a significant issue for Canterbury, yet the extent to which this is leading to over-estimations/underestimations of population remain unclear. This is despite CPRE Kent raising this issue within our previous consultation response, pointing to the successful challenge our charity had on this point with respect to Coventry housing numbers. Rather, the 2021 Canterbury Housing Needs Assessment simply dismisses the fact the current ONS methodology shows a negative domestic net migration balance for Canterbury, preferring instead to delegate any further analysis of this until after the full 2021 census results are known.

As it is, current ONS data shows that natural population change in Canterbury has been negative in 19 out of the last 20 years (i.e. more deaths than births) meaning population growth within the district has been driven almost entirely by net migration.<sup>2</sup> Compounding the issue, Canterbury has not been delivering the affordable housing the district clearly needs, delivering on average 69 affordable houses a year over the last 5 years, of which on average less than 9 a year have been social rent affordable houses. This is in a district where only 2% of residents can currently afford a house on the open market on their incomes alone<sup>3</sup>. Consequently, the housing that has been delivered and is already being planned for is predominantly to accommodate an external market demand, rather than the existing populations housing need.

We believe it is wrong to simply continue sacrificing yet more greenfield land in an attempt to accommodate what is an unsatisfiable external market demand. Seeking to justify this growth on the basis it is needed to fund infrastructure, predominately new roads, is similarly nonsense given additional housing and road-building will just further aggravate the problems the draft plan is seeking to resolve. It is also the case that encouraging yet further growth now will necessitate the need for yet further growth in the future, which is clearly an entirely unsustainable long-term strategy.

**For these reasons, CCC must update its Housing Needs Assessment, drawing on the most up-to-date evidence. This includes the 2018 based household projections, 2020 based population projections and recent 2021 census releases (which now includes up-to date student and home ownership details). From this, it should be setting a realistic housing need figure based upon the most up-to-date household projections alone, focusing on a figure which is deliverable and sustainable, rather than blindly seeking to meet an arbitrary and artificial uplift.**

Alongside this, far greater consideration must be given to how CCC is going to meet its affordable housing needs, most notably social rent, given the clear failure of simply relying upon the current developer-led approach. This includes a clear policy which focuses on the need for specific requirements of housing for the youngest and increasing percentage of oldest in the adult population.

We firmly believe such an alternative approach is entirely warranted given the district's unique circumstances and would be found sound under the revised NPPF paragraph 35 test.

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<sup>2</sup> See [https://www.kent.gov.uk/data/assets/pdf\\_file/0004/8149/Whats-causing-Kents-population-growth.pdf](https://www.kent.gov.uk/data/assets/pdf_file/0004/8149/Whats-causing-Kents-population-growth.pdf)

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

**4. With this revised need figure a genuine brownfield first approach needs to be undertaken**

Before any greenfield land is released, far more needs to be done to demonstrate that brownfield opportunities have been maximised. Currently, in making the case that there are insufficient brownfield sites, the plan is just relying on those very few sites that happened to be brownfield sites identified as part of the general call for sites exercise and those sites already identified within Canterbury's Brownfield Register. This is simply not enough.

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

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

With respect to delivery, it is noted that some 53 brownfield or mixed brownfield sites put forward and assessed as part of the site selection process have not been taken forward on the basis that they were not deemed deliverable. For those sites in otherwise sustainable locations, we would expect to see evidence the Council has pursued all appropriate funding opportunities for brownfield regeneration which may arise from the Levelling Up and Regeneration Bill. We would also expect to see evidence of the Council having fully engaged with all possible delivery partners before determining any sustainably located brownfield site is not deliverable.

Likewise, it is not enough to simply list known brownfield locations and regeneration areas as "opportunity areas" in the manner draft policies C3, C23 and HB2 currently do. This is little more than the Council putting these sites on the too difficult to deal with pile, when in fact they are exactly the sites the Council needs to be dealing with before allocating yet more greenfield land. Unless they are properly master planned at this stage, we won't know how many residential units they can truly accommodate if the density is being maximised in a manner which is appropriate to that sites circumstances and setting. Likewise, these sites will never attract any regeneration funding they may need the whole time they are just sitting as some vague aspirational site within a plan. Funding partners need both detail and a firm commitment from the Council to bring a site forward. Only a clear local plan allocation accompanied with a Council led masterplan provides this.

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

**5. Sustainable transport must be prioritised instead of impactful road infrastructure.**

CPRE Kent object to the extent of the new road building in the district proposed in this plan and in particular the South-West Canterbury link road as proposed within draft policy C7 and the Eastern Movement Corridor as proposed within draft policy C11. It is our view that any transport infrastructure funding should be being directed towards genuine and achievable sustainable transport measures which genuinely reduce as much as possible reliance on private cars.

The benefits of new roads schemes are extremely over-stated and in reality, generate traffic above background trends by inducing traffic, which leads to permanent and significant environmental damage. Specifically, the CPRE report *The end of the road? Challenging the road building consensus*, March 2017 <https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus> reveals that road-building is failing to provide the congestion relief and economic boost promised, while devastating the environment. It directly challenges government claims that 'the economic gains from road investment are beyond doubt'; that road-building will lead to 'mile a minute' journeys; and that the impact on the environment will be limited 'as far as possible'. The report shows how road building over the past two decades has repeatedly failed to live up to similar aims.

Unless and until all road vehicles, their manufacture and servicing and the power generated to propel them are all zero-emission, an increase in road traffic means an increase in greenhouse gas emissions. As it is, the UKFIRES report *Absolut Zero (Delivering the UK's climate change commitment with incremental changes to today's technologies)* published in November 2019 sets out that for the UK to achieve zero carbon emissions by 2050 road use will need to be at 60% of 2020 levels - through reducing distance travelled or reducing vehicle weight; and that total energy required to transport food will need to be reduced to 60%. <https://ukfires.org/absolute-zero/>

CCC's own evidence base recognises the obvious negative impact that building more roads would have with respect to its climate change ambitions. The Climate Change topic paper identifying, even with best case estimates regarding modal shift and the success of the Canterbury Circulation Plan, annual emissions from road traffic will increase from the current baseline of 230 ktCO<sub>2</sub>/y to 249 ktCO<sub>2</sub>/y. Unsurprisingly it concludes "*continued growth in journeys projected by proposed development within the plan will continue to increase carbon emissions*". However, rather than seeking to limit the growth and building of roads, it seems that the plan is to offset with further renewable energy infrastructure, concerningly with reference made to both onshore wind generation and further solar farms. With such infrastructure likely to have significant negative impacts in their own right, such as landscape or loss of agricultural land, we believe that this is completely the wrong approach. Surely the demand and need to offset needs to be reduced before yet further destruction of the countryside is considered?

As it is, the proposed Eastern Movement Corridor would not only destroy a significant area of countryside through the land take needed for the actual road, but also through the land take needed for the significant building of houses required to fund it. The road building alone would come with a significant negative ecological impact, with the intended route currently shown to run through ancient woodland at Trenley Park and through the buffer of the SSSI of Old Park & Chequers Wood. Similarly, the South-West Canterbury link road is also predicated upon significant loss of greenfield countryside being lost to fund it, whilst and all but destroying the historic Hollow Lane.

With respect to achieving genuine and achievable sustainable transport measures, whilst we recognise the intentions of the Canterbury Circulation Plan, we share the concerns of many others that this is an ill-conceived solution for the circumstances of Canterbury. Specifically, we are concerned that by linking this with the Eastern-Movement corridor, traffic would be increased on those roads outside the city centre through longer journey times and through new and induced traffic upon the proposed by-pass. Whilst excerpts from an updated transport model provided within the Transport Topic paper appear to show that this would be case, is disappointing that a fully updated transport model has not been provided with this consultation.

Rather, a far greater focus should be upon maximising and funding the active and sustainable transport measures intended to go alongside the Circulation plan. This includes the significant removal of road space for private cars and reallocation to sustainable transport. Such measures should and must make using sustainable transport the



most attractive and natural choice over and above use of a private vehicle i.e. more carrot is needed and less stick.

If any form of congestion charging is to be introduced alongside such measures, it will need to be significantly simpler than that in the proposed circulation plan and certainly not linked to the building of an unnecessary and habitat destroying bypass.

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

This draft plan appears to be allocating significant development upon Best and Most Versatile land, yet nowhere is this even quantified, let alone any measures setting out what sequential measures have been undertaken so as to minimise its loss. We do not believe this significant constraint has been given the due regard necessary within the site selection process. As set out within CPRE's recent report "Building on our food security" in the past 12 years England has lost over 14,000 hectares of Grade 1 and 2 agricultural land to development, the equivalent to the productive loss of around 250,000 tonnes of vegetables. It also appears that this figure is increasing, with nationally there being a 100-fold increase in 2022 from that built on in 2010. This loss cannot continue to be ignored which is why it remains our view the selection of these site is at odds with NPPF paragraph 174(b). This issue will need to be give significantly more genuine consideration with respect to the allocations which do make it to any submission version of the plan.

#### **7. Conclusion**

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

- The plan making process timescale should be amended and produced in line with the soon to be updated NPPF.
- A revised and updated Housing Needs Assessment should be undertaken to inform the revised plan based upon the updated NPPF, focusing on a figure which is actually deliverable and sustainable.
- With this revised figure, the overall spatial strategy must be revisited in a way that reduces and removes the many extremely damaging and unnecessary proposed greenfield allocations, whilst truly maximising the potential brownfield opportunities.
- Undertaking these above steps will remove any justification there may have otherwise have been for the clearly damaging proposed road building schemes.

**Our detailed comments are as follows:**

**Policy SS1: Environmental Strategy for the district**

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

1. **To what extent do you agree or disagree with the proposed approach set out in Policy SS1?** Please tick one box only

Tend to disagree

- 1a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

- 1c. **Do you have any other comments on Policy SS1**

We recognise and applaud the number of positive actions set out within this policy. This includes the provision of new open spaces, the protection of habitats and valued landscapes, the full recovery of the Stodmarsh Nature Reserve, the delivery of 20% biodiversity net gain and the 20% tree and hedgerow cover for new development across the district.

However, these positives are undermined through the promotion of a spatial strategy which focuses upon road building and unsustainably located garden settlements which will clearly be baking in car-dependency demonstrates what scant regard is really being given to the threat of climate change. Likewise, priority seems to be being given to mitigation measures over avoidance i.e. let's prioritise not losing existing trees and biodiversity ahead of setting out measures about how they are to be replaced. That is, let's ensure the existing environmental baseline is taken into account when



calculating the extent of open space and environmental/biodiversity mitigation necessary as a result of development to ensure any purported gains are as claimed.

Certainly, it is CPRE Kent's view that the countryside itself can provide many of the solutions to tackling climate breakdown, while supporting rural communities and economies to thrive. We need development to meet local needs, while contributing to efforts to mitigate and adapt to the climate emergency. Sustainable development needs to be redefined to focus on living within environmental limits and the importance of addressing the climate emergency.

To meet this requirement, it is CPRE Kent's view that that the proposed spatial strategy needs to be re-visited in a manner that optimises the recycling of land by adopting a truly 'brownfield first' policy, followed by distribution based on the settlement hierarchy with the focus on the Canterbury urban area and growth being limited to need, rather than demand.

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

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

2. **To what extent do you agree or disagree with the proposed approach set out in Policy SS2?** Please tick one box only

Tend to disagree

- 2a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

With respect to paragraph 5 and 8, we would again question as to how the arbitrary threshold of 300 homes has been reached. Will there not be instances under this threshold whereby such new facilities are required to make a proposed development truly sustainable? Likewise will there not be instances whereby development above this threshold will be needing to contribute to vitality of existing community hubs rather than creating entirely new hubs which will compete with existing?

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

- 2b. **Do you have any other comments on Policy SS2?** If so, please write in below

Again, we feel that what would be otherwise extremely positive ambitions are being entirely undermined by the proposed spatial strategy.

### Policy SS3: Development Strategy for the district

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

3. **To what extent do you agree or disagree with the proposed approach set out in Policy SS3?**  
Please tick one box only

Strongly  
disagree

- 3a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

We strongly object to the proposed housing target of 1,252 dwellings a year. As set out in our overarching comments, CCC must update its Housing Needs Assessment, drawing on the most up-to-date evidence. This includes the 2018 based household projections, 2020 based population projections and recent 2021 census releases (which now includes up-to date student and home ownership details). From this, it should be setting a realistic housing need figure based upon the most up-to-date household projections alone, focusing on a figure which is deliverable and sustainable, rather than blindly seeking to meet an arbitrary and artificial uplift.

We also call for the employment floorspace figures to be revisited as it is our view the plan is seeking to significantly over-allocate employment space. For starters, clearly it is the case that a refined housing target set in accordance with our above comments will naturally necessitate a similar reduction in employment space. As set out within Lichfields EDTS Focused Update, labour supply based upon actual population projections rather than the inflated local plan housing projections amount to an overall employment floorspace need of 81,410 sqm, yet this plan is seeking to allocate some 172,220 sqm (which is not including retail comparison space). More significantly however, there is already some 146,277 sqm of employment space currently available. This includes a recognised over-supply of employment land to accommodate growth needs in Canterbury City.

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

Consequently, it's our view that the level of employment land this plan is seeking to allocate needs to urgently be reviewed. Alongside this, there needs to be a thorough and robust review of

existing, permissioned, or allocated employment land. For employment land on brownfield sites or other sustainable locations which is either long term vacant, under-utilised or has not come forward as anticipated needs to urgently be revisited as to whether it could be better utilised for housing or mixed-use schemes. Finally, for those greenfield allocations which have no realistic prospect of delivering employment, as minimum the site allocations boundaries need to be redrawn so as to reduce yet further unnecessary land take/provide.

For detailed reasons set out below and in response to Policy R1, there is no justification for the inclusion of Land at Cooting Farm.

With respect to the rural settlement hierarchy, we have reviewed the 2020 Rural settlement study underpinning this. Consequently, we are concerned that not only is this being based upon incorrect and out of date information but also the methodology, particularly with respect to the spatial assumptions underpinning the study are unclear. This is leading to concerns certain settlements are being over promoted within the hierarchy. We would therefore call for an updated and far more robust study to be undertaken to inform the submission version of the plan.

3b. **Do you have any other comments on Policy SS3?** If so, please write in below

The above points will necessitate a complete and overall review of the spatial strategy. Accordingly, the evidence base will need significant updating which allows for the plan making process and timescale to be amended and produced in line with the soon to be updated NPPF.

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

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

4. **To what extent do you agree or disagree with the proposed approach set out in Policy SS4?** Please tick one box only

X Strongly disagree

- 4a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

As set out within our overarching comments, whilst we recognise the intentions of the Canterbury Circulation Plan, we share the concerns of many others that this is an ill-conceived solution for the circumstances of Canterbury. Amongst the most significant concern is that it is intrinsically linked and therefore reliant upon delivery of the Eastern Movement Corridor. To us therefore, the Canterbury Circulation Plan is doing little more than attempting to solve the problem of city congestion by sending it elsewhere, creating longer and unnecessary journeys in the process whilst in so doing creating further environmental impact and yet further loss of countryside. We are therefore concerned that no alternative options other than road building for reducing city traffic have been presented or properly appraised within the sustainability appraisal.

Likewise, it is disappointing to see a road building first approach being taken elsewhere across the district. Notably, we are completely unconvinced that a new junction of the A299 will bring any significant benefit to Whitstable, though will clearly be of detriment to the residents of Chestfield owing to increased rat running.

That is not to say many of the interventions set out with the Transport Topic paper intended to go alongside the Circulation plan are not without merit. It is therefore our view the plan needs to move away from the gimmick that is the zoning plan and be entirely refocused upon maximising and funding the active and sustainable transport measures currently set out to go alongside the Circulation plan. This includes redirecting any developer contribution funding which would be otherwise going towards the Eastern Movement Bypass, the South

Policy SS4 or its equivalent within the submission plan would need to be entirely re-written to reflect and secure such measures.

- 4b. **Do you have any other comments on Policy SS4?** If so, please write in below

Unfortunately, despite many of the good intentions and ambitions set out within SS4 paragraphs 3-7, there is next to no substance nor clarity as to how these currently vague ambitions will be secured delivered or monitored. The submission version of the plan will need significantly more detail to be found sound.

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

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

5. **To what extent do you agree or disagree with the proposed approach set out in Policy SS5?** Please tick one box only

X Tend to disagree

- 5a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

The current version of the plan has insufficient clarity regarding the infrastructure needed to deliver the development being proposed and in particular detailed costings.

A stark example is the current uncertainty with respect to a new hospital being delivered or what will happen with the two separate sites where land is being safeguarded for this.

This lack of basic detail regarding infrastructure is of particular concern for a spatial strategy for which the need to deliver real modal shift is vital. New development should be underpinned by active travel and public transport links that are available from the start to provide the opportunity for residents to use non-car modes of transport from the start. This includes ensuring that funding for public transport and active travel is fully costed and with delivery dates established. The recent Transport for new homes report which looked at Garden Villages and Garden Towns found that they were car dependent resulting in more traffic on roads and the need for massive investment in road capacity; and that whilst public transport was very popular it was underfunded, as was cycling.

## Chapter 2: Canterbury

In line with our overarching comments, **we strongly disagree with policies C1 through to C26.**

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

Currently, the overall "strategy" for Canterbury appears to be a series of uncoordinated and developer led new greenfield settlements on the existing urban boundary. Individually, these will be too small to viably or realistically support any significant level of self-containment, yet collectively, it is extremely difficult to see or understand how these sites will integrate with each other or the existing allocations.

With no clear overall masterplan for the city, what will happen in practice is that each individual site developer will seek to defer key infrastructure provision to neighbouring allocations, with the last site standing either falling over completely, or seeking to reduce any infrastructure offerings on the grounds of viability. A masterplan will need to cover both existing allocations and proposed, along with clear expectations, with respect to phasing and delivery and any equalisation expectations between the sites.

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

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

### Policy C1: Canterbury City Centre Strategy

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

1. **To what extent do you agree or disagree with the proposed approach set out in Policy C1?** Please tick one box only

X Strongly disagree

- 1a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions



We are extremely concerned as to the impact that the growth strategy being promoted within this plan will have upon Canterbury historic centre. We also consider the Canterbury Circulation Plan an ill-conceived solution for the circumstances of Canterbury.

### **Policy C3: Canterbury City Centre Regeneration Opportunity Areas**

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

3. **To what extent do you agree or disagree with the proposed approach set out in Policy C3?** Please tick one box only

Strongly disagree

- 3a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

### **Policy C4: Canterbury Urban Area**

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

4. **To what extent do you agree or disagree with the proposed approach set out in Policy C4?** Please tick one box only

Strongly disagree

- 4a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

We question the rationale of paragraph 4 to blindly protect existing business and employment areas against a backdrop of a significant over-provision of employment land as detailed within our comments regarding draft policy SS3. Rather, a far more nuanced approach is required which will see a thorough and robust review of existing, permissioned, or allocated employment land. For employment land on brownfield sites, or other sustainable locations which is either long term vacant, under-utilised or has not come forward as anticipated, needs to urgently be revisited as to whether it could be better utilised for housing or mixed-use schemes.

## **Policies C5 – C10: South West Canterbury**

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

5. **To what extent do you agree or disagree with the proposed approach set out in Policy C5?** Please tick one box only

X Strongly disagree

- 5a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

In view of our over-arching comments, we clearly object to the proposed south-west allocations in the strongest possible terms. Whilst each of these allocations are individually harmful in their own right, collectively they will decimate this area of attractive and valued countryside along with the historic setting of the city.

## **Policy C10: South West Canterbury Link Road**

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

10. **To what extent do you agree or disagree with the proposed approach set out in Policy C10?** Please tick one box only

Strongly disagree

- 10a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

The success and deliverability of site C5 to C11 is predicated upon the South-West Canterbury link road. Amazingly however, this is currently entirely un-costed and is barely mentioned with in the draft Infrastructure Delivery Plan. It's our view the link road is simply undeliverable without a level of investment that would render the sites unviable. Amongst other considerations, it is clear from measurements that we have taken on site that the underpass at Hollow Lane would need to be entirely re-engineered so as to accommodate the bypass. Specifically, the total height of carriageway of Hollow Lane to carriageway of A2 is approx. 6.1m . When combined with an incline at the required 1:12 gradient for the link road, the link road would be 72.6m in length at this point.

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

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

**Policy C11 – C15: East Canterbury**

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

11. **To what extent do you agree or disagree with the proposed approach set out in Policy C11?** Please tick one box only

X Strongly disagree

- 11a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

In view of our over-arching comments, we clearly object to the proposed East Canterbury allocations in the strongest possible terms. To us, to lose such a significant amount of greenfield land simply to fund a £163m environmentally damaging road scheme at a time when we need to be facing up to the realities of climate change can simply not be justified.

**Policy C16: Canterbury Eastern Movement Corridor**

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

16. **To what extent do you agree or disagree with the proposed approach set out in Policy C16?** Please tick one box only

X Strongly disagree

- 16a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

We do not believe this road will led to reduced traffic but will in fact induce traffic. We remain unconvinced it will lead to better air quality within the city, particularly given how interlinked it is with the Canterbury Circulation Plan, nor in fact provide any positives for climate change. We fail to see how it brings any positives for the countryside or any benefit for the 29% of all adults who cannot drive.

Rather, the proposed Eastern Movement Corridor would not only destroy a significant area of countryside through the land take needed for the actual road, but also through the land take needed for the significant building of houses required to fund it. The road building alone would come with a significant negative ecological impact, with the intended route currently shown to run through ancient woodland at Trenley Park and through the buffer of the SSSI of Old Park & Chequers Wood.

**Policy C21: Land at Canterbury Business Park**

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

21. **To what extent do you agree or disagree with the proposed approach set out in Policy C21?** Please tick one box only

Strongly disagree

21a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

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

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

Given the rural location of the site, its good access to A2, limited public transport service, possible nature of proposed employment, including hours of operation, attraction of the city for tourists staying at the holiday village, it is likely that people will travel to and from the site by car or motorbike. CPRE Kent are concerned that the development might worsen levels of air quality within the present AQMA Canterbury

3, as well as any future expansion, and be contrary to the National Planning Policy Framework and the Local Plan.

### Chapter 3: Whitstable

With the exception of three sites (W2, W9 and W10) all allocations at Whitstable appear to be on greenfield land. It is also the case that part of the justification for the proposed strategy is to fund road infrastructure such as new A299 slips to the south of Chestfield. In line with our overriding comments, until it is demonstrated the overall housing requirements have been aligned to need and that it has been clearly demonstrated all brownfield development opportunities have been identified and development potential maximised in a manner which has regard to its setting, **we strongly disagree with policies W3 to W8.**

#### Policy W8: Bodkin Farm

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

8. **To what extent do you agree or disagree with the proposed approach set out in Policy W8?** Please tick one box only

Strongly disagree

8a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

In addition to our above comments, we are extremely concerned to see the Council intends to allocate a secondary school and 250 homes upon a site that only as recently as the 2017 Local Plan was identified as a strategic green gap.

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

We are also aware of significant local concern from those who back onto Swalecliffe Brook as to the risk of flooding. These concerns do not appear unfounded given that the first flood alert of 2023 for this area was the early hours of the 1<sup>st</sup> January.

## Chapter 4: Herne Bay

### Policies HB1 to HB3: Herne Bay Town Centre Strategy

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

1. **To what extent do you agree or disagree with the proposed approach set out in Policy HB1?** Please tick one box only

Strongly disagree

- 1a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

We consider that a significant opportunity is being missed with respect to the potential for significant brownfield regeneration within the Herne Bay Urban Area. The potential for significant regeneration for this area was identified in the 2006 Canterbury District Local Plan, with the Herne Bay Area Action Plan for Herne Bay adopted in 2010. Despite the Area Action Plan providing the framework for the delivery of regeneration projects in the town, any significant regeneration is yet to really materialise within the urban area.

We are therefore extremely disappointed to see that rather than finally actually take the opportunity to see significant brownfield regeneration and redevelopment, the intention of this draft plan is to again lazily roll the sites forward again as vague opportunity sites. As set out in overarching comments, such an approach will never attract the external funding that may be needed to actually see delivery of these sites.

Each of these opportunity areas need to be properly master planned and included as clear and individual allocations within the submission plan.

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

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

4. **To what extent do you agree or disagree with the proposed approach set out in Policy HB4?** Please tick one box only

Tend to disagree

- 4a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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



## Chapter 5: Rural Areas

### Policy R1: Land at Cooting Farm

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

1. **To what extent do you agree or disagree with the proposed approach set out in Policy R1?** Please tick one box only

Strongly disagree

- 1a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

CPRE Kent strongly object to this proposed allocation. With it being so abundantly at odds with good plan making, we would be extremely surprised to see it making the submission version of the plan. In the event that it does, we will make the following initial observations:

- 1) The site is so constrained there is simply no logic to its selection as a potential location for a new garden settlement. Specifically:
  - Development of the site will result in significant landscape harm. Specifically, the southern portion of the site is within the AONB and the entire site is within the North Kent Downs AHLV. This site cannot have been discussed with the North Kent Downs AONB team for it to have been included at this stage as we would anticipate them to be objecting in the strongest possible terms.
  - Sections of the site in the south/west are covered by Borders Ileden & Oxenden Woods SSSI, Natural England Priority Habitat Inventory and Natural England Ancient Woodland. This site cannot have been discussed with Natural England, who again we would anticipate them to be objecting in the strongest possible terms.
  - The site is Grade 2 and 3 BMV. As set out in our overarching comments, CCC is clearly paying little to no regard to the requirements of NPPF 174(b) with respect to BMV.
  - There will clearly be a more than substantial heritage harm arising from the site, not least as listed building Cooting farmhouse and a proportion of the site is in a Conservation Area. We would strongly dispute that any public benefits of the development would overcome this harm.
  - There are areas of ancient woodland to the west along the site boundary. There are a large number of mature trees across the site.
  - The Site is located adjacent to priority habitat to the south west. Protected species could therefore be affected by the development of this site.
  - The site is Ground Water Source Protection zone adding yet further developmental costs.
- 2) There are likely to be significant additional and currently unknown costs associated with this site which significantly undermine its deliverability

- Parcels in south-west corner of site covered by KCC Minerals: Brickearth and therefore safeguarded. More concerning, the site is deemed likely to contain contamination dispersed across the site. The extent of this, and more significantly in terms of delivery, the likely costs of remediating this are not currently known.
  - The impact on the A257 junction at Wingham is stated as currently unknown. In view of the fact that Dover District Council has just had to remove a proposed allocation of 400 units nearby within Aylesham owing to the fact of the anticipated impact at this junction could not be overcome, we would suggest the impact of a much larger development will be much harder and more costly to overcome.
  - It is currently unknown whether a secondary school will need to be provided. Secondary schools are extremely expensive and come with unique transport considerations
- 3) The site will almost be entirely reliant upon Dover District's infrastructure and services, yet it is far from clear as to whether Dover is a willing partner to this arrangement.

Overall, the site is in an entirely unsuitable and unsustainable location, is well below the size required to achieve any level of real self-containment, would lead to unacceptable and unwanted coalescence between Addisham and Aylesham, would be nearly entirely car-dependant and as yet, quite clearly would not pass the deliverability test at the Local Plan Examination.

In the unlikely event that this proposed allocation does make it the proposed submission version of the plan, CPRE Kent will be working with the communities of Addisham and Aylesham to ensure the planned development is scrutinised as robustly as possible.

**Policy R8: Land to the west of Rattington Street**

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

8. **To what extent do you agree or disagree with the proposed approach set out in Policy R8?** Please tick one box only

Strongly disagree

- 8a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

In line with our overarching comments and with the current uncertainty regard the future of Chartham Paper Mill, we would resist the development of this greenfield site.

**Policy R9: Land at Ashford Road**

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

8. **To what extent do you agree or disagree with the proposed approach set out in Policy R8?** Please tick one box only

Strongly disagree

- 8a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

In line with our overarching comments regarding the existing oversupply of employment space, coupled with the current uncertainty regard the future of Chartham Paper Mill, we would resist the extension of this non-designated employment area into open countryside.

**Policies R12 and R13**

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

12. **To what extent do you agree or disagree with the proposed approach set out in Policy R12?** Please tick one box only

Strongly disagree

- 12a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

In view of the significant development already occurring or allocated within Hersden, we would resist yet further greenfield development.

#### **Policy R14 – R16: Littlebourne**

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

14. **To what extent do you agree or disagree with the proposed approach set out in Policy R14?** Please tick one box only

X Tend to disagree

- 14a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

In view of the significant development already occurring or allocated within Littlebourne, we would resist yet further greenfield development.

#### **Policy R17 to R19 Sturry**

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

17. **To what extent do you agree or disagree with the proposed approach set out in Policy R17?** Please tick one box only

X Tend to disagree

- 17a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

In view of the significant development already occurring or allocated within Sturry, we would resist yet further greenfield development.

#### **Policy R20: Aylesham south**

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

20. **To what extent do you agree or disagree with the proposed approach set out in Policy R20?** Please tick one box only

disagree

- 20a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

CPRE Kent has a standing objection with respect to SAP24 - Land to the South of Aylesham within the submission version of the Dover District Local Plan with respect to overdevelopment at odds with the original 2005 masterplan for Aylesham, impact on the landscape, including dark skies, significant loss of Best and Most Versatile land, insufficient infrastructure including lack of public transport, impact upon the ancient woodland within the site along with concerns about whether access and highway impact can be mitigated.

These objections would similarly apply for this draft allocation.

#### **Policy R26: Broad Oak Reservoir and Country Park**

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

26. **To what extent do you agree or disagree with the proposed approach set out in Policy R26?** Please tick one box only

Tend to disagree

- 26a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

26b. **Do you have any other comments on Policy R26?** If so, please write in below

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

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

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

### Policy R28: Countryside

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

28. **To what extent do you agree or disagree with the proposed approach set out in Policy R28?** Please tick one box only

Strongly agree

- 28a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

Whilst we strongly support the sentiment of this policy, regrettably there will be very little Countryside left to protect within the Canterbury District without a significant re-visiting of the proposed growth strategy as set out within our overarching comments.

### Chapter 6: District-wide Strategic Policies

With respect to all Development Management type policies within this draft plan, we fully expect the nationally set Development Management policies as envisaged within the current NPPF consultation to at least be known, if not adopted, by the time the submission version of this plan is consulted upon. We therefore will only be making brief observations upon these policies at this time.

### Policy DS1: Affordable housing

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

1. **To what extent do you agree or disagree with the proposed approach set out in Policy DS1?** Please tick one box only

Tend to agree

- 1a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

High quality affordable housing should be available for everyone, as long as this isn't dependent on higher housing numbers.

### Policy DS2: Housing mix

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



2. **To what extent do you agree or disagree with the proposed approach set out in Policy DS2?** Please tick one box only

Neither agree nor disagree

2a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

**Policy DS3: Estate regeneration**

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

3. **To what extent do you agree or disagree with the proposed approach set out in Policy DS3?** Please tick one box only

Strongly agree

3a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

**Policy DS4: Rural housing**

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

4. **To what extent do you agree or disagree with the proposed approach set out in Policy DS4?** Please tick one box only

Strongly agree

- 4a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

Placemaking and local distinctiveness will be key.

### **Policy DS5: Specialist housing provision**

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

5. **To what extent do you agree or disagree with the proposed approach set out in Policy DS5?** Please tick one box only

X Tend to agree

- 5a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

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

### **Policy DS6: Sustainable design**

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

6. **To what extent do you agree or disagree with the proposed approach set out in Policy DS6?** Please tick one box only

Tend to disagree

6a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

Welcome commitment to efficient use of land at 3(a), but are concerned that the densities being suggested are too low and will result in additional greenfield land take to meet housing need.

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

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

The National Design Code (2021) states that density is an essential component of an effective design code. Building at 20-40dph is noted as representing development in outer suburbs; suburban development is pegged at 40-60dph and urban neighbourhoods at 50-120dph.

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

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

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

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

The policy should allow for new and emerging technologies.

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

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

### Policy DS7: Infrastructure delivery

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

7. **To what extent do you agree or disagree with the proposed approach set out in Policy DS7?**

Please tick one box only

Tend to disagree

7a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

See earlier comments on garden cities and the critical mass needed to make them genuinely sustainable communities.

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

### Policy DS8: Business and Employment Areas

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

8. **To what extent do you agree or disagree with the proposed approach set out in Policy DS8?** Please tick one box only

Strongly disagree

8a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

It is therefore our view much of the new employment space being allocated, including those significant allocations upon greenfield sites, simply have little to no realistic prospect of delivery. The consequence of going forward on this basis is that the areas being allocated for employment

uses upon the various greenfield allocations are more likely to be turned into yet more effectively unplanned windfall housing when it comes to the planning application stage. This will have a significant combined impact of firstly undermining any claim around levels of employment use self-containment within these large mixed-use allocations and then secondly a far higher than anticipated impact upon local infrastructure which must now accommodate higher than anticipated housing numbers and employment outward commuting levels.

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

In particular, we are extremely concerned to see Highland Court looking to be allocated here for the reasons set out in our response to policy C21

### **Policy DS10: Town centres and community facilities**

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

10. **To what extent do you agree or disagree with the proposed approach set out in Policy DS10?** Please tick one box only

Tend to agree

10a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

Reference is made at paragraph 6.23 of the rises of online shopping, but it’s not clear whether the Council has any evidence that these centres, including rural service centres have been adversely affected by online sales and deliveries? If they have, what role can these centres reasonably provide for their immediate communities?

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

We note that the Council has recently published its Rural Settlement Study 2020 (<https://storymaps.arcgis.com/stories/d6393d28d79243f4b634e7edecb75c3b>). It has not, we believe, been made public or put out to consultation until now. It is not a document which is downloadable and searchable – which makes it very difficult to engage with.

Thanington is variously described as being a village and a Rural Service Centre. The Thanington resources centre seems to have been included as a village hall, when it is obviously within the urban envelope, and not a standalone village. It is not clear what consultation has been undertaken with the parish councils across the district or why the methodology has changed.

**Policy DS11: Tourism development**

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

11. **To what extent do you agree or disagree with the proposed approach set out in Policy DS11?** Please tick one box only

Neither agree nor disagree

- 11a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

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

**Policy DS12: Rural economy**

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

12. **To what extent do you agree or disagree with the proposed approach set out in Policy DS12?** Please tick one box only

Tend to disagree

- 12a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

See comments at Policy DS4.

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

Paragraph 174(b) of the NPPF requires planning decisions to contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land. With paragraph 175(b), footnote 58 stating that “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”

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

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

### **Policy DS13: Movement Hierarchy**

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

13. **To what extent do you agree or disagree with the proposed approach set out in Policy DS13?** Please tick one box only

X Tend to agree

- 13a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

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



**Policy DS14: Active and sustainable travel**

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

**14. To what extent do you agree or disagree with the proposed approach set out in Policy DS14? Please tick one box only**

Tend to agree

**14a. What changes do you think should be made and why? Please provide any evidence you have to support your suggestions**

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

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

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

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

**Policy DS15: Highways and Parking**

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

**15. To what extent do you agree or disagree with the proposed approach set out in Policy DS15? Please tick one box only**

Tend to disagree

**15a. What changes do you think should be made and why? Please provide any evidence you have to support your suggestions**

Part 2 should be amended. More than a minimum of one in 10 spaces (at parking areas at new developments) should have an EV charge hook up, in order not to be a barrier to EV car take up.

All EV charge points should be rapid chargers (as opposed to 7kW trickle chargers – which will take 8 hours to charge a car), to ensure that a full charge is capable, within a reasonable period of time.

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

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

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

**Policy DS20: Flood risk and sustainable drainage**

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

20. **To what extent do you agree or disagree with the proposed approach set out in Policy DS20?**  
Please tick one box only

Neither agree nor disagree

20a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

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

**Policy DS22: Landscape Character**

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

22. **To what extent do you agree or disagree with the proposed approach set out in Policy DS22?** Please tick one box only

Tend to agree

22a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

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

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

The Council will also need to have regard to dark skies. NPPF 185(c) requires planning policies to limit the impact of light pollution on intrinsically dark landscapes and nature conservation, and to limit the impact of light pollution from artificial light on local amenity. It would be useful to add reference to policy DM18.

#### **Policy DS24: Publicly accessible open space and sports**

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

24. **To what extent do you agree or disagree with the proposed approach set out in Policy DS24?** Please tick one box only

X Tend to disagree

- 24a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

The responsibility for maintenance and the cost of maintenance needs clarification.

Will there be a management charge levied on householders (and what controls will there be to ensure there won't be exorbitant rises)? Will the Council/KCC be responsible?

#### **Policy DS25: Renewable energy and carbon sequestration**

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

25. **To what extent do you agree or disagree with the proposed approach set out in Policy DS25?** Please tick one box only

X Tend to disagree

- 25a. **What changes do you think should be made and why?** Please provide any evidence you have to support your suggestions

Whilst CPRE fully supports the need to switch to renewable energy as a matter of urgency, this cannot be undertaken blindly at the expense of our valued landscapes or at the expense of Best and Most Versatile land required for our food security. Far more caveats must therefore be given within this policy as to what constitutes "appropriate locations throughout the district"

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

As above with respect to all Development Management type policies within this draft plan, we fully expect the Nationally Set Development Management policies as envisaged within the current NPPF consultation to at least be known, if not adopted, by the time the submission version of this plan is consulted upon.