

Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (January 2023)

Policy/Paragraph	Commentary
	<p>The County Council is committed to working with the City Council and other key stakeholders to ensure that sustainable growth is delivered to meet the identified housing need, supported by necessary infrastructure – that is planned for, funded and delivered in a timely manner, ahead of housing / commercial growth where required – ensuring an ‘Infrastructure First’ approach to development. An “Infrastructure First” approach is embedded in the Kent and Medway Infrastructure Proposition, a proposal that seeks to enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need now and in the future. To deliver sustainable development, close working and a collaborative approach with all key stakeholders will be crucial – taking in to account all necessary infrastructure and services required to deliver robust and resilient communities during the plan period and beyond within the District – whilst also considering any cross boundary, strategic implications of growth.</p> <p>The County Council recognises that the Council has adopted the Community Infrastructure Levy (CIL), however, as set out in this response, the County Council wishes to work with the City Council in respect of the Governance to ensure the necessary levels of contributions towards critical infrastructure are secured and infrastructure is delivered to support sustainable growth.</p> <p>As the Local Plan progresses, the County Council would value timely engagement in the shaping and inputting, as appropriate, into the draft Statement of Common Ground to ensure that all cross-boundary and strategic matters are properly and clearly addressed.</p>
Introduction and consultation	
General commentary	<p><u>Public Rights of Way (PRoW):</u> The County Council welcomes the general positive incorporation of specific PRoW policy within the Regulation 19 consultation. The County Council would request that the relevant PRoW network is shown on Policy area maps within the Local Plan to give context and enable holistic working with other infrastructure.</p> <p>The County Council requests that all site allocations are considered with regard to the PRoW and Active Travel opportunities which could be offered.</p> <p><u>Sustainable Urban Drainage Systems (SuDS):</u> The County Council, as Lead Local Flood Authority has reviewed the Regulation 19 consultation and is generally satisfied with its contents as it appears to be fairly robust from a sustainable drainage viewpoint. The County Council is particularly supportive of the active encouragement of multi-functional green and blue infrastructure in association with new developments.</p>
Chapter 1. Spatial Strategy for the district	
General commentary	<p><u>Minerals and Waste:</u> The County Council, as Minerals and Waste Planning Authority notes that there are several allocations for development (residential and or employment) that are coincident with safeguarded land-won deposits. In consideration of Policy CSM 5: Land-won Mineral Safeguarding of the adopted Kent Minerals and Waste Local Plan 2013-30 (Early Partial Review) 2020 (KMWLP)) these sites will require a Mineral Assessment (MA) to be conducted to ensure the presumption to safeguard, as set out in Policy CSM 5, is not derogated from leading to unnecessary sterilisation of the mineral resources. The City Council should consider Policy DM 7: Safeguarding Mineral Resources of the KMWLP, which sets out the requirements to be satisfied if an exemption from the presumption to safeguard is justified.</p> <p>The County Council notes that the Local Plan delegating the Mineral Assessment process to the planning application stage. This is not ideal, as it will, inevitably mean that the Plan’s development allocation delivery fully considered in terms of its adherence with the KMWLP. It is preferable for the MA process to be part of the consideration as to the Plan’s allocations.</p> <p><u>Culture and Creative Economy</u> Detailed comments in respect of cultural infrastructure are available in Appendix A.</p>
Vision for the district to 2045	<p><u>Highways and Transportation:</u> The County Council, as Local Highway Authority welcomes connectivity through investment in walking and cycling routes in order to promote modal shift away from car trips being taken for many short and medium length journeys, together with promoting good public transport links to also attract movement away from the car reliance.</p> <p><u>Heritage Conservation:</u> The County Council welcomes the consideration of an enhanced historic environment as a goal for the Vision. Canterbury’s exceptional historic environment is one of its greatest assets</p>

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	<p>and it is essential that it is conserved, enhanced and respected if the new growth is to be embedded successfully into the urban centre. Heritage can also play a key role in creating a thriving environment. KCC would recommend that the text be modified to “<i>Our important and historic habitats and landscape.</i>”</p> <p><u>Sport and Recreation:</u> The County Council is supportive of proposals for new indoor sports, recreation, fitness, swimming or skating facilities, or for the improvement or enhancement of existing facilities, on suitable sites across the district where there is a demonstrable local need for the proposal and the development accords with other policies in this Plan.</p>
Strategic objectives for the district	<p><u>Highways and Transportation:</u> The County Council considers that investment in pedestrian and cycle links within the existing urban areas, and through provision within developments themselves planned in and around these areas will be key to achieving the 15 minute target time for healthy journeys, and priority towards bus infrastructure to allow public transport easier access into the city than it would be through trips by car. This is likely to be achieved through bus movement being able to take place freely through routes where private vehicles are held up in congestion.</p> <p><u>Heritage Conservation:</u> The County Council supports the objective to “Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses.” Canterbury’s heritage is essential to a wide range of aspects of life in the district and it appropriate that a strategic objective be focused on it.</p>
Sustainable design strategy for the district	<p><u>Heritage Conservation:</u> The County Council welcomes the prominence given to Canterbury’s outstanding historic environment in paragraph 1.12, and the recognition both of the important role it can play and the fragility of the resource. As the text notes, high quality design is central to the conservation of the resource and to exploiting its benefits.</p> <p>In respect of paragraph 1.13, the historic environment has a significant role to play in the conservation of resources required for development, and also in energy efficiency. Old buildings can at times be more energy efficient than newer ones and of course have already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced a range of guidance on the role that heritage can play in mitigating climate change and historic building adaptation (‘Climate Change Adaptation Report’ (Historic England, 2016)). The guidance demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient than more modern structures and settlements. This has also been updated in the HE report ‘There’s no Place Like Old Homes : re-use and Recycle to Reduce Carbon’ (Historic England 2019). This could usefully be highlighted in the text which at present rather suggests the brunt of making housing energy efficient must only be borne only by new buildings.</p> <p>In respect of paragraph 1.14. connectivity of new development to existing areas can be supported by careful appreciation of the historic patterns of tracks and routeways that is provided by Historic Landscape Characterisation.</p>
Policy SS1 – Environmental strategy for the district	<p><u>Highways and Transportation:</u> The County Council, as Local Highway Authority notes that where new developments are proposed of 300 homes or more, the development should incorporate a minimum of 20% tree coverage across the site and consideration will need to be given to any proposed trees? within areas that are to be adopted as public highway. The placement of trees can often be at conflict with street lighting proposals, which have to illuminate the highway surface to defined levels and uniformity to gain technical approval. This can result in trees being removed from layouts after planning consent has been granted, so it is important that the lighting design and calculations are carried out at the planning stage to ensure compatibility.</p>
Policy SS2 – Sustainable design strategy for the district	<p><u>Highways and Transportation:</u> New communities of more than 300 homes are proposed to contain community hubs to reduce the need to travel for day-to-day services. This is welcomed to support active travel and reduced car use, but caution should be placed on whether this amount of development could sustain the range of facilities expected in the long run. Care will need to be taken when reviewing Transport Assessments submitted to consider these developments, to ensure robust trip rates are used and they are not reliant on the use of lower rates justified by community facilities.</p> <p><u>Heritage Conservation:</u> The County Council welcomes clauses 1 and 3 which provide a firm commitment to Canterbury’s built heritage and to its integration into areas of new build.</p>

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<p>Policy SS3 – Development strategy for the district</p>	<p><u>Highways and Transportation:</u> In respect of the County Council as Local Highway Authority, the general approach identified in the policy is supported, with Canterbury being the principal focus area for development in the District, and Whitstable and Herne Bay being the secondary focus. These areas of development provide the greatest opportunity to deliver strategic infrastructure to support the growth proposed here.</p> <p>The new Garden Community Broad Location at Cooting Farm may prove more difficult to accommodate, and further studies into the impact development here may have on the surrounding road network will need to be considered, particularly through the neighbouring district of Dover.</p>
<p>Policy SS4 – Movement and transportation strategy for the district</p>	<p><u>Highways and Transportation:</u> The movement strategy is supported in its aim to remove the need for people to travel into the central part of Canterbury by car, and encourage reallocation of road space to active travel and public transport. The constraints of the city dictate that limited opportunities exist to deliver capacity improvements to the ring road, so any growth in traffic levels will add to the existing congestion unless the need to drive into or through the city centre is reduced:</p> <p>To deliver this, the approach of removing car parks from within the city to locations outside the inner ring road, and enhancing the bus priority and park & ride facilities is welcomed, together with the delivery of road infrastructure to allow new routes around outskirts of the city to access these.</p> <p>The traffic modelling undertaken so far has demonstrated that the draft Local Plan option provides the best overall traffic scenario of those options tested prior to this in order to support growth in the district. However, there remain some links within the model that do show some worsening of journey times on existing routes, and KCC look forward to continuing working with the City Council to identify where mitigation may still be required. This will be particularly relevant to where congestion may impact on bus journeys in addition to car trips, as this will be less effective in delivering modal shift towards public transport.</p> <p>KCC is supportive of the policy. Th County Council has worked with the City Council to help develop the core of the strategy. This is an ambitious strategy that has put forward the Canterbury Circulation Plan, and the measures included within this seek to overhaul the way people travel into and around Canterbury. KCC has endorsed the associated Transport Topic paper that accompanies the draft Local Plan, and will continue to collaborate with the City Council in order to work up the finer details of how the measures will be implemented.</p> <p><u>PRoW:</u> The County Council requests specific reference to the PRoW network to ensure town and rural connectivity across Canterbury.</p>
<p>Policy SS5 - Infrastructure strategy for the district</p>	<p><u>Highway and Transportation:</u> The delivery of both highway and sustainable transport infrastructure is critical for the effective support of growth and to install the desired travel behaviours and modal shift into occupants, employees and users of new development. However, it is appreciated that viability may influence when development may be able to provide contributions or deliver the infrastructure direct, so it will be important to determine when these measures will be required. It is noted that the draft Infrastructure Delivery Plan has not yet identified this, and KCC will welcome the opportunity to work with the City Council to agree the timescales for delivery.</p> <p><u>PRoW:</u> The County Council requests specific reference to PRoW network improvements and contributions to support development.</p> <p><u>Sustainable Urban Drainage Systems (SuDS):</u> The County Council recommends that this policy is strengthened so as to encourage the utilisation of on site features, where appropriate, to deal with surface water and effectively encourage the reduction in use of existing infrastructure thus reducing the associated risk of flooding resulting from capacity issues.</p>
<p>Chapter 2. Canterbury</p>	
<p>Policy C1 - Canterbury city centre strategy</p>	<p><u>Highway and Transportation:</u> The removal of most traffic with the implementation of the Canterbury Circulation Plan does provide the opportunity to develop car free developments, but servicing of these will still need to be considered. The policy does acknowledge this and the active travel promotion within the area. However, whilst it seeks well designed storage space for refuse and recycling, it should also require cycle storage for appropriate developments.</p>

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Policy C2 – 43 to 45 St George’s Place	<p><u>Development Investment:</u> The County Council requests that ‘off-site community infrastructure’ (para 1 b)iii) is further defined to ensure that it includes all of KCC’s services sought – Adult Social Care, Community Learning & Skills, Youth Services, Libraries and Waste Disposal & Recycling Facilities. It is recommended that this clarity is then reflected in all allocation policies, within paragraphs 6.13 -6.18 and possibly within the glossary.</p>
Policy C4 - Canterbury urban area	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network in respect of commentary relating to connectivity given the opportunities offered through the network.</p>
Policy C5 – South West Canterbury	<p><u>Highways and Transportation:</u> The County Council notes that this policy promotes the delivery of direct access from the A2 and a link road to connect to the A28 in order to improve functionality of the A2 junction at Wincheap. This would replace the current local plan requirement of the Wincheap fourth slip that was expected to be provided by the consented development at Thannington. No strategic linkage has been indicated on the concept masterplan to provide the vehicular route between the current and proposed A2 junctions. It is not yet clear what impact the collection of development sites that make up C5 will have on the local highway network, so transport assessments to consider these will be required, as noted in Policy C6, C7 and C8.</p> <p>The delivery of the new A2 junction has been specified as required before occupation of the Merton Park and Land North of Hollow Lane (C6 and C7) sites, and Merton Park envisaged to deliver this with the assistance of contributions from Land North of Hollow Lane and Milton Manor House (C8). The mechanism to provide the contributions to Merton Park from the other development sites may need to be agreed in advance to ensure the viability for the former.</p> <p><u>PRoW:</u> The County Council welcomes reference to PRoW network within this policy but recommends this is also referred to within the section relating to Access and Transportation.</p>
Policy C7 – Land to the north of Hollow Lane	<p><u>Development Investment:</u> The County Council recommends that reference to “<i>New and improved walking and cycling connections to school locations, both within the site and surrounding communities</i>” (for example, as per Site C7 Para 4 a) (iv)) should be strengthened to ensure that these links are in place prior to the transfer of the school sites. This should be consistent throughout the Local Plan.</p> <p><u>Minerals and Waste:</u> It is noted that this site is coincident with safeguarded land-won minerals (Safeguarded Mineral-River Terrace Deposits) therefore the policy must make reference to the need to have a MA as part of the site’s consideration at the planning application stage in accordance with the KMWLP. The County Council therefore recommends the inclusion of the following wording within this Policy: <i>Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations</i>’ to ensure the Local Plan allocations are consistent with the issue of mineral safeguarding under the KMWLP.</p>
Policy C9 – Land to North of Cockerling Road	<p><u>Highways and Transportation:</u> Development at this sites is proposed to be car free. This may prove difficult without effective on-street parking controls to prevent residents from parking in the surrounding roads where currently either limited waiting is possible or permits are issued for dedicated bays. However, alterations to the existing restrictions may disadvantage existing residents who are currently able to park overnight on the streets. How permits are issued in these areas will also need reviewing, as it might be necessary to exclude the proposed development from eligibility to these.</p> <p><u>PRoW:</u> The County Council requests specific reference to the PRoW network within this policy.</p>
Policy C10 – South West Canterbury Link Road	<p><u>Minerals and Waste:</u> It is noted that this site is coincident with safeguarded land-won minerals (Safeguarded Mineral-River Terrace Deposits and Brickearth (Other Areas) – Ashford, Canterbury, Dover, Shepway) therefore the policy must make reference to the need to have a MA as part of the site’s consideration at the planning application stage in accordance with the KMWLP. The County Council therefore recommends the inclusion of the following wording within this Policy: <i>Provide a minerals assessment in accordance with the Kent Minerals and Waste Local</i></p>

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	<i>Plan and other material considerations'</i> to ensure the Local Plan allocations are consistent with the issue of mineral safeguarding under the KMWLP.
Policy C11 – East Canterbury / Policy C12 – Land south of Littlebourne Road / Policy C13 – Land south of Bokesbourne Lane / Policy C14 – Land north of Bokesbourne Lane at Hoath Farm / Policy C15 – Canterbury Golf Course / Policy C16 – Canterbury Eastern Movement Corridor	<p><u>Highways and Transportation:</u> The developments referred to within this policy (Policy C12 to C16) are expected to deliver the Eastern Movement Corridor (EMC) through their sites to connect the A28 to the A2 at Bridge. The phasing of these will be important to ensure that each development, will have appropriate access to the highway network and not hold each other to ransom. It is inevitable that the developments will come forward in isolation, so the transport assessments will need to consider the stand alone position where adjoining sections of the EMC have not been provided. The draft policy C13 does already suggest the trigger points for the provision of the EMC and how many dwellings can be served on each site before it has been completed, but this will need to be assessed through modelling first before this is committed to the policy wording.</p> <p>The crossing of the railway line for the EMC will be challenging to arrange between stakeholders, so discussions with all involved will need to be had at an early stage to broker how this element will be delivered.</p>
Policy C15 – Canterbury Golf Course	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network within this policy.</p>
Policy C16 - Canterbury Eastern Movement Corridor	<p><u>PRoW:</u> The County Council requests amendment to this policy to include reference to the need to ensure connection with PRoW network.</p> <p><u>Waste Management:</u> The proposal for the Eastern Movement Corridor is shown to cross the closed Sturry Road landfill site which is now known as Sturry Road Community Park. The County Council as Waste Disposal Authority has a duty of care for this site and undertake routine monitoring to ensure that it does not cause harm to human health or the environment. The supporting feasibility reports, appear to indicate that only part of the Community Park is landfill. This is not the case. The County Council as Waste Disposal Authority wishes to be updated on progress of the scheme.</p>
Policy C19 – Land at the former Chaucer Technology School	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network within this policy.</p>
Policy C20 - Land at Folly Farm	<p><u>Minerals and Waste:</u> It is noted that this site is coincident with safeguarded land-won minerals (Safeguarded Mineral- Brickearth (Other Areas) – Ashford, Canterbury, Dover, Shepway) therefore the policy must make reference to the need to have a MA as part of the site's consideration at the planning application stage in accordance with the KMWLP. The County Council therefore recommends the inclusion of the following wording within this Policy: <i>Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations'</i> to ensure the Local Plan allocations are consistent with the issue of mineral safeguarding under the KMWLP.</p>
Policy C22 - Land on the eastern side of Shelford Landfill	<p><u>Highways and Transportation:</u> Any development of this site should provide a transport assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars. Consideration should also be given to the possibility of providing contributions towards local highway improvements supporting growth.</p> <p><u>PRoW:</u> The County Council requests specific reference to the PRoW network within this policy wording relating to access and transportation.</p>
Policy C23 - Wincheap commercial area	<p><u>Highways and Transportation:</u> This policy retains the current requirement for the gyratory system and bus route that is considered to be committed development through planning approval already granted for Cockering Farm. The aspirations of the draft policy would extend the reach of the gyratory further to the south west, and it is appreciated that this will necessitate alterations to the currently approved scheme and its interaction with the A28.</p>

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Policy C24 – Land to the south of Sturry Road	<p><u>PRoW:</u> The County Council requests that walking and cycling routes should be accommodated where reasonable, not relocated, as part of this scheme.</p> <p><u>Waste Management:</u> Policy C24 looks to allocate land to the south of Sturry Road as strategic wetland as part of the Canterbury Nutrient Mitigation Strategy. The County Council as Waste Disposal Authority currently leases part of this land and have a small-scale treatment plant on site which treats leachate contaminated groundwater arising from the adjacent closed landfill site. This is a critical piece of infrastructure that must be maintained to protect the River Stour and surrounding water environment.</p> <p>The County Council as Waste Disposal Authority wishes to be kept updated on progress of the scheme. KCC is willing to share information on the closed landfill site and the leachate treatment plant, which has the potential to contribute towards the Nutrient Mitigation Strategy.</p>
Policy C25 - Canterbury urban area regeneration opportunity areas	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW with regards to walking and cycling access and connectivity.</p>
Policy C26 - Land north of University of Kent	<p><u>Highways and Transportation:</u> This area does have the potential to contain large scale development and the highway impacts will need to be fully considered in order to demonstrate that the network can accommodate it. KCC would look forward to exploring this with the City Council and considering what opportunities may exist to provide mitigation and facilitate a northern movement corridor to assist with the circulation plan.</p> <p><u>PRoW:</u> The County Council requests specific reference to the PRoW with regards to walking and cycling access and connectivity.</p>
Chapter 3. Whitstable	
Policy W1 – Whitstable Town Centre strategy	<p><u>PRoW:</u> The County Council requests specific reference to the Crab and Winkle Way and the PRoW links to the route.</p>
Policy W2 – Whitstable Harbour	<p><u>Highways and Transportation:</u> Development here has the potential to increase congestion in the town centre through attracting more vehicle movements, but KCC is supportive of proposals to improve accessibility by walking and cycling. It is recognised that infrastructure contained with other policies will help alleviate the traffic volumes to give weight to accepting development in this location.</p> <p><u>Minerals and Waste:</u> The Local Plan also has allocations where there are safeguarded mineral handling and processing facilities. The respective policies and relevant exploratory memoranda do not acknowledge this. This allocation is identified as a broad location for mixed use development with appropriate uses to include fishing, commercial, business, employment, leisure, parking and residential development. The policy goes on to state that a Supplementary Planning Document (SPD) will be draw up to masterplan the regeneration and redevelopment of the harbour. The County Council requests that consideration is had for the safeguarded mineral importation wharf and associated asphalt plant – which are safeguarded by KMWLP Policy CSM 6: Safeguarded Wharves and Rail Depots and Policy CSM 7: Safeguarded Other Mineral Plant Infrastructure.</p> <p>It is unclear if Policy W2 recognises that these safeguarded facilities could potentially be incompatible with the Plan’s redevelopment objectives for Whitstable Harbour (Site WHA1). KCC understands the Plan’s intention is to redevelop Whitstable Harbour; however, this would entail the loss of these facilities. These facilities would therefore need to be assessed against the requirements of Policy DM 8 to be acceptable against the safeguarding policies in the KMWLP. The loss of these facilities would also conflict with the policies of the adopted Development Plan. Alternatively, if the Plan’s objective is to allow these facilities to be retained, they would presumably be within 250m of the new development (including residential development). Therefore, an Infrastructure Assessment would need to be prepared to address the requirements of Policy DM 8 of the KMWLP, to demonstrate that the facilities can be retained and not have their lawful operation and continued viability compromised, including their accessibility to the highway network. Given that the extensive area is occupied by these safeguarded facilities, any meaningful redevelopment of the site would have significant safeguarding implications, as there would be limited space available outside the areas of these facilities for meaningful redevelopment of the site. Policy W2 does not consider the safeguarding status of these facilities and how this would be addressed. KCC understands that the SPD would elaborate on this matter, however, this issue is considered to be fundamentally important, and it should therefore be addressed within the Local Plan.</p>
Policy W3 – Whitstable urban area	<p><u>Highways and Transportation:</u> Whilst contained in the associated policies W4 and W5, this policy does not specifically include the infrastructure of the proposed east facing slips on the A299 among those that are</p>

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	<p>listed. It would be consistent to include reference to it within this policy, as has been done for the park and bus facility with fast link bus to the town centre. The ambitions of policy W4 would be supported.</p> <p><u>PRoW:</u> The County Council requests that Point 8 is amended to include the PRoW network and the England Coast Path National Trail.</p>
3.9 South Whitstable – strategic development area	<p><u>Development Investment:</u> to clarify, the provision of a new SEND school is to mitigate the needs of all proposed housing growth in this draft local plan. Provision of a new facility on the coast will provide a balance of infrastructure, with existing SEND schools in and around Canterbury central.</p>
Policy W4 – South Whitstable	<p><u>PRoW:</u> The County Council requests consideration within this policy to PRoW connectivity to town and other amenities.</p>
Policy W5 – Land at Brooklands Farm	<p><u>Highways and Transportation:</u> Early delivery of the east facing slips on the A299 is considered to be important in order to accommodate some level of development on this site, and to limit the current congestion experienced on the Thanet Way east bound from the current A299 exit. The proposed 50% occupation trigger for delivery of the infrastructure will need to be assessed to see whether this ought to be a lower value in case the highway impact is unacceptable before that figure is reached.</p> <p><u>PRoW:</u> The County Council requests specific reference to the Crab and Winkle Way and the PRoW links to the route.</p>
Policy W6 – Land south of Thanet Way	<p><u>Highways and Transportation:</u> This site is intrinsically linked to policy W7 (Land at Golden Hill), and the redline on the concept master plan includes the boundary for both of these sites. As with policy W5, the County Council as Local Highway Authority will need to consider whether it will be necessary to restrict the amount of development that takes place here before the delivery of the new east facing slips on the A299, in order to limit the increase in congestion on Thanet Way prior to the strategic mitigation.</p> <p><u>PRoW:</u> The County Council requests specific reference to the Crab and Winkle Way and the PRoW links to the route.</p>
Policy W7 – Land at Golden Hill	<p><u>Highways and Transportation:</u> Policy W6 requires a transport assessment and proportionate contributions for the east facing slips. However, policy W7 only includes the contribution, but KCC would expect that a transport assessment is also carried out for this site.</p> <p>As primary access for the site allocation at Policy W7 is to be taken from W6, assessment of whether secondary access into this site from Golden Hill will need to be undertaken. The concept masterplan indicates the route to Golden Hill as opportunities for cycling and walking connections, but it is likely that the developer of this site will seek to gain vehicular access via there too in order not to be reliant on W6 coming forward first. If this is to be avoided for either highway safety or residential amenity reasons, then the policy may need to specify vehicular access only being taken solely from W6, rather than primary.</p>
Policy W8 – Bodkin Farm	<p><u>Highways and Transportation:</u> The opportunities suggested to provide pedestrian and cycle linkages to the south and west of the site will need to be explored early in the planning process, as this may be hindered by land ownership. The school site in particular will want to be easily accessible to the existing community in order to encourage active travel from these areas instead of by car.</p>
Chapter 4. Herne Bay	
Policy HB1 – Herne Bay Town Centre strategy	<p><u>Highways and Transportation:</u> Regeneration of the town centre is supported by the County Council.</p> <p>KCC looks forward to the opportunity of working with the LPA to accommodate improved connectivity for pedestrians and cyclists, use of public transport and improving traffic flow.</p>

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Policies HB1 – HB3	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network and the England Coast Path National Trail.</p>
Policy HB4 – Land to the west of Thornden Wood Road	<p><u>Highways and Transportation:</u> The proposed vehicular accesses to serve this site on Thornden Wood Road and A2990 Thanet Way have the potential to reroute traffic from Greenhill Road, and alter the balance of flows at the two new junctions being formed through the development at Land South of Greenhill, reference CA/21/01277. These new junctions may require alterations, and access to sections of Greenhill Road and Thornden Wood Road restricted, to manage new distribution of traffic. Additional land not shown within the site boundary could therefore be required to accommodate junction improvements or ancillary works on Thornden Wood Road.</p> <p><u>Development Investment:</u> The County Council request the removal of the reference to ‘circa 8.03ha’. The minimum land requirement is 8.09ha to enable the secondary school to be provided without creating abnormal costs for the County Council taking into account the site is not level and dissected by a stream, where the land then falls away steeply.</p>
Policy HB10 – Eddington Business Park	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network in respect of walking and cycling.</p>
Chapter 5. Rural areas	
Policy R1 – Land at Cooting Farm	<p><u>Highways and Transportation:</u></p> <p>The full impact on the highway network of large-scale development at this location needs to be assessed in more detail. The Canterbury Local Model Study Area provides a high-level assessment of the network within the district but does not consider that beyond the administrative boundary. This allocation is located immediately adjacent to the boundary with Dover. Further analysis needs to be undertaken to assess routes north and east of Adisham where trips are likely to occur in order to access destinations in Thanet to the north, and the A256 for areas within the District of Dover. These comments are also applicable for Policy R20 for Aylesham South. There are known locations of constraints along these routes, and regular use of the rural lanes as direct routes to access the strategic highway network, and this will need to be analysed in greater detail. It is likely that mitigation will be necessary in the form of local highway improvements and/or new infrastructure to make the site acceptable.</p>
Policy R2 – Rural service centres	<p><u>Highways and Transportation:</u></p> <p>KCC will be in support of minor development that helps to sustain the viability of rural settlements, and enhance their community facilities and services, provided they can be appropriately accessed by walking and cycling.</p>
Policy R3 – Blean	<p><u>Minerals and Waste:</u> It is noted that this site is coincident with safeguarded land-won minerals (Safeguarded Mineral- Brickearth (Other Areas) – Ashford, Canterbury, Dover, Shepway) therefore the policy must make reference to the need to have a MA as part of the site’s consideration at the planning application stage in accordance with the KMWLP. The County Council therefore recommends the inclusion of the following wording within this Policy: <i>Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations</i>’ to ensure the Local Plan allocations are consistent with the issue of mineral safeguarding under the KMWLP.</p>
Policy R4 – Land at Mill Field	<p><u>Highways and Transportation:</u> Access to the facilities in Blean for pedestrians and cyclists from the development will be key to making this site acceptable, and the policy seeks to provide new and improved walking and cycling connections via Blean Recreation Ground or Tyler Hill Road. The latter may be difficult to achieve due to the restricted width of the carriageway and the constraints either side from existing development that appears to make the provision of a footway unlikely.</p> <p><u>PRoW:</u> The County Council requests specific reference to the PRoW network in respect of walking and cycling and the Crab and Winkle Way.</p>

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	<p><u>Minerals and Waste:</u> It is noted that this site is coincident with safeguarded land-won minerals (Safeguarded Mineral- Brickearth (Other Areas) – Ashford, Canterbury, Dover, Shepway) therefore the policy must make reference to the need to have a MA as part of the site’s consideration at the planning application stage in accordance with the KMWLP. The County Council therefore recommends the inclusion of the following wording within this Policy: ‘Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations’ to ensure the Local Plan allocations are consistent with the issue of mineral safeguarding under the KMWLP.</p>
<p>Policy R7 – Chartham</p>	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network in respect of walking and cycling.</p>
<p>Policy R8 – Land to the west of Rattington Street</p>	<p><u>Highways and Transportation:</u> Whilst the key on the concept masterplan shows the symbol for indicative vehicle access location, the plan itself does not include this to suggest whether either or both Baker’s Lane and Rattington Street would serve as the access to the development. It is not clear whether this is an omission or still to be investigated – this should be clarified.</p>
<p>Policy R9 – Land at Ashford Road</p>	<p><u>Minerals and Waste:</u> It is noted that several of the development allocations in the Plan are coincident with safeguarded land-won minerals (the relevant KMWLP being Policy CSM 5: Land-won Mineral Sites), yet the relevant policies of the Plan, in certain instances, does not mention the need to have a MA as part of the site’s consideration at the planning application stage. They are as follows: Policy R9- Land at Ashford Road - Safeguarded Mineral-River Terrace Deposits. The inclusion of ‘Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations’ within the above policies, as is included in others where land-won safeguarded minerals are found, would make the Plan’s allocations for development policy provision consistent with the issue of mineral safeguarding of the adopted Development Plan.</p>
<p>Policy R10 – Milton Manor Concrete Batching Plant</p>	<p><u>Minerals and Waste:</u> The Milton Manor Concrete Batching Plant is safeguarded by Policy CSM 7: Safeguarded Other Mineral Plant Infrastructure. Its loss should be justified against the exemption criteria as set out in Policy DM 8 of the KMWLP. However, the site is required to be restored by condition of the extant planning permission as the associated mineral extraction activity has ceased. Therefore, unless this situation changes and a permeant planning permission is gained for the retention of the currently safeguarded facility, it is considered that the need to satisfy the exemption criteria of Policy DM 8 is academic. Furthermore, the nearby proposed Local Plan allocation Milton Manor House (Policy C8) would be within 250m of the Milton Manor Concrete Batching Plant and would require having an Infrastructure Assessment prepared to satisfy the requirements of Policy DM 8 of the KMWLP only if the latter were to be permanently retained, although this is considered unlikely.</p>
<p>Policy R11 – Hersden</p>	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network in respect of walking and cycling.</p>
<p>Policy R12 – Bread and Cheese Field</p>	<p><u>Highways and Transportation:</u> Development at Hersden in the adopted Local Plan has so far been enabled through the planned delivery of the Sturry Link Road, and those sites allocated in that plan have contributed towards it. This site may be required to contribute towards highway improvements associated with accommodating the proposed growth from the draft plan. This is also applicable to the additional developments in Sturry under policies R17, R18 and R19.</p>
<p>Policy R15 – The Hill, Littlebourne</p>	<p><u>Minerals and Waste:</u> It is noted that several of the development allocations in the Plan are coincident with safeguarded land-won minerals (the relevant KMWLP being Policy CSM 5: Land-won Mineral Sites), yet the relevant policies of the Plan, in certain instances, does not mention the need to have a MA as part of the site’s consideration at the planning application stage. They are as follows: Safeguarded Mineral- Brickearth (Other Areas) – Ashford, Canterbury, Dover, Shepway. The inclusion of ‘Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations’ within the above policies, as is included in others where land-won safeguarded minerals are found, would make the Plan’s allocations for development policy provision consistent with the issue of mineral safeguarding of the adopted Development Plan.</p>
<p>Policy R16 – Land north of Court Hill</p>	<p><u>Minerals and Waste:</u> It is noted that several of the development allocations in the Plan are coincident with safeguarded land-won minerals (the relevant KMWLP being Policy CSM 5: Land-won Mineral</p>

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	Sites), yet the relevant policies of the Plan, in certain instances, does not mention the need to have a MA as part of the site's consideration at the planning application stage. They are as follows: Safeguarded Mineral-River Terrace Deposits. The inclusion of 'Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations' within the above policies, as is included in others where land-won safeguarded minerals are found, would make the Plan's allocations for development policy provision consistent with the issue of mineral safeguarding of the adopted Development Plan.
Policy R17 – Sturry	<u>PRoW:</u> The County Council requests specific reference to the PRoW network in respect of walking and cycling.
Policy R21 – Local service centres	<u>Highways and Transportation:</u> Minor development within the settlements identified as local service centres and referenced in policies R22 to R27 will in principle be acceptable provided they can be accessed appropriately by vehicles, pedestrians and cyclists, and these are likely to only require limited mitigation and the creation or improvement of Active Travel provision. This can be identified through the consideration of the planning application.
Policy R24 – Land at Goose Farm, Shalloak Road	<u>PRoW:</u> The County Council requests specific reference to PRoW CB48/46.
Policy R26 – Broad Oak Reservoir and Country Park	<u>PRoW:</u> The County Council requests specific reference to PRoW connectivity and access routes to the new Country Park.
Policy R28 – Countryside	<u>PRoW:</u> The County Council requests specific reference to the protection and enhancement of the PRoW network.
Chapter 6. District-wide strategic policies	
Policy DS1 – Affordable housing	<u>PRoW:</u> The County Council requests specific reference to the need for offsite contributions to ensure connectivity and encourage access to the outdoors for health and leisure benefits.
Policy DS3 – Estate regeneration	<u>PRoW:</u> The County Council requests specific reference to the need for offsite contributions to ensure connectivity and encourage access to the outdoors for health and leisure benefits.
Rural housing	<u>Heritage Conservation:</u> It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage, the County Council and Kent Downs AONB Unit have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that the City Council considers adopting the guidance as Supplementary Planning Document (SPD), as part of the Local Plan process. We would be happy to discuss this further.
Policy DS4 – Rural housing	<u>PRoW:</u> The County Council requests specific reference to the PRoW network in respect of walking and cycling. <u>Heritage Conservation:</u> The County Council is supportive of clause 2 (a) of the policy that encourages re-use of heritage assets. The County Council also supports clause d (5) which permits siting of new build among groups of farm buildings. It should be noted though that this could equally apply to non-housing development should the historic character of the farmstead permit it.
Policy DS6 – Sustainable design	<u>Highways and Transportation:</u> The County Council notes that included within this policy is the requirement promote healthy lifestyles through making walking and cycling safe and accessible. This reflects with KCC transport objectives to place less reliance on car journeys and is supported. Similarly, it seeks the appropriate design of developments to accommodate parking and electric vehicle

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	<p>charging, which is also supported.</p> <p><u>PRoW:</u> The County Council requests specific reference to the PRoW network within point c (viii) and 7 (d).</p> <p><u>SuDS:</u> Whilst the desire to achieve 90l/s per person per day consumption rate is commendable, the County Council as Lead Local Flood Authority requests if the re-use of treated water or indeed collected surface water could be specifically mentioned and encouraged within the policy - for example, grey water systems.</p> <p><u>Heritage Conservation:</u> The County Council welcomes clause 5 that requires developers of projects over 300 homes to include a strategy for culture and heritage in their project designs. This can help to ensure not only that Canterbury's heritage is treated appropriately during the process but also that the opportunities it provides can be seized. It is important that these strategies include all aspects of heritage, including historic buildings, landscapes and archaeological remains, that they explain how the heritage will be conserved and enhanced during the development process, and that they show how the proposed development has responded to the potential of the heritage to better integrate the new development into the existing landscape and townscape. The community engagement identified in clause 5 should, where appropriate, also include heritage aspects in the form of community archaeology. S106 agreements should be used to ensure that the new community, and the existing community affected by the development, have the opportunity to develop activities designed to help them enjoy and value their heritage. KCC is developing advice for the inclusion of heritage aspects into S106 agreements and would be happy to discuss this further with the City Council.</p> <p><u>Broadband:</u> Policy DS6 needs to be reviewed in light of the changes to build control that are being introduced at the end of this month "Approved Document R Volume 1: Physical infrastructure and network connection for new dwellings".</p>
Infrastructure delivery	<p><u>Development Investment:</u> The City Council has worked closely with the County Council to plan for the education, adult social care, waste and communities (Libraries, Youth and Community Learning) infrastructure required to meet the needs of the new population. The results of this work have been included within the draft plan and site-specific policies. In addition to requirements for the above infrastructure, KCC welcomes the inclusion of:</p> <ul style="list-style-type: none"> - Percentage requirements for bungalow provision - Percentage requirements for M(4)2 and M(4)3 dwellings - Older person accommodation - Specific site sizes for new school provision - Community facilities with fully accessible kitchens and changing place facilities
Policy DS7 – Infrastructure delivery	<p><u>Highways and Transportation</u> KCC looks forward to working with the City Council in order to agree the appropriate mechanisms to secure and deliver the infrastructure required to mitigate development. The timing and phasing of infrastructure or mitigation will require consideration, and KCC welcomes the policy requirement to deliver walking and cycling connections to existing infrastructure prior to occupations, so that active travel behaviour is adopted from the outset.</p> <p><u>PRoW:</u> The County Council requests specific reference to the PRoW network (includes Footpaths, Bridleways, Restricted byways and Byways Open to all Traffic) and cycleways.</p>
Education and associated development	<p><u>Development Investment:</u> The County Council recommends that section on 'Education and associated development' – should be titled Higher Education and Associated Development, to avoid confusion with Early Years, Primary, Secondary and SEND Education.</p> <p>The County Council would welcome continued joint working with the City Council in the development of the CIL Governance arrangements. The County Council has previously</p>

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	<p>experienced challenges with securing the necessary contributions elsewhere in Kent to deliver education provision in the County through CIL, the County Council would therefore request if all education contributions could be secured through S106 agreements as opposed to CIL.</p> <p><u>Skills and Employability:</u> The County Council welcomes the recognition of the importance of higher skills and supports the development of the Universities, UKC, UCA and Christchurch. The EKC Group has a significant presence, with Canterbury College located in the town and new facilities at Spring Lane and Hersden – this should be referred to within the Local Plan.</p> <p>Paragraph 6.19 it refers to the importance of higher skills , but (nationally) there is growing recognition for the need to develop <i>intermediate</i> skills (levels 3-5), particularly technical skills as recognised in the recent Skills and Post 16 Education Act. It is recommended that the Local Plan also considers intermediate skills and further/tertiary education. The County Council would further recommend that the Local Plan makes reference to the Local Skills Improvement Plan, developed by the Kent Invicta Chamber of Commerce and Kent's three FE Colleges. This gives employers a greater role in driving skills training and strongly links training to productivity and economic development.</p>
Policy DS10 – Town centres and community facilities	<p><u>PRoW:</u> The County Council requests specific reference to the need to deliver sustainable access as criteria for developments in urban and rural settings.</p>
Policy DS11 – Tourism development	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network in relation to tourism as the PROW network and the National Trails across Canterbury as a whole are a significant tourist attractor.</p>
Policy DS12 – Rural economy	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network.</p>
Policy DS13 – Movement hierarchy	<p><u>Highways and Transportation:</u> The County Council in agreement with the proposal.</p>
Policy DS14 – Active and sustainable travel	<p><u>Highways and Transportation:</u> The County Council as Local Highway Authority supports the objectives of this proposal.</p>
Policy DS15 – Highways and parking	<p><u>Highways and Transportation:</u> The County Council considers that the general tools provided by this policy are appropriate, particularly in terms of the need for transport assessment of developments and the promotion of active travel, access to public transport, parking standards, electric vehicle charging and infrastructure. Collaborative working with neighbouring sites to rationalise construction traffic management is also welcomed.</p>
Policy DS14 – Active and sustainable travel	<p><u>Development Investment:</u> The County Council would also welcome the provision of policy requirements for school provision to be located within 400m of a bus stop, as well as new housing.</p>
Policy DS18 – Habitats and landscapes of national importance	<p><u>Kent Tree Strategy:</u> In respect of this policy, the County Council would recommend that the wording of the NPPF paragraph 180 is reflected within this policy which refers to the refusal of development unless there are wholly exceptional reasons [in respect of development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodlands]. The City Council should also note that ancient woodland is defined as being irreplaceable, meaning that there is no adequate mitigation or compensation measures.</p>
Policy DS20 – Flood risk and sustainable drainage	<p><u>Heritage Conservation:</u> SuDS may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains in particular are highly vulnerable to changing moisture levels which can accelerate the decay</p>

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	<p>of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.</p> <p>When SuDS are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. Kent County Council has recently produced guidance for SUDS and the historic environment (Appendix B). It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.</p> <p>The County Council recommends that this policy is amended as follows: <i>“Any proposals for development in this area must appropriately consider possible coastal change, flood risk, <u>impact on heritage assets</u>, future wetland habitat enhancements and public safety”</i>.</p>
<p>Policy DS21 – Supporting biodiversity recovery</p>	<p><u>Biodiversity:</u> The County Council welcomes the target of 20% biodiversity net gain (BNG) and requests that this is also reflected within site policies. The County Council would suggest that any off-site net gain provision does not need to be limited to the Canterbury.</p> <p>The County Council recommends that species surveys are required to be carried out to understand what protected and notable species are present within the development allocations. Habitat creation will need to be informed by species surveys to ensure that allocations can continue to support those species. Local Plan policy should require these species surveys to be carried out to ensure that legislation is not breached and BNG can ensure that the correct habitats are being created.</p> <p>The County Council also recommends reference to Kent’s Plan Bee, a pollinator action plan developed by the County Council that seeks to improve the food sources and general habitat for pollinators. The County Council would also recommend that Kent’s Plan Tree also be referenced, this is due to be published shortly.</p> <p><u>Kent Tree Strategy:</u> The County Council would request that this policy ensures that appropriate mechanisms to ensure any mitigation or compensation measures are secured and delivered accordingly with similar habitats replacing those lost – such as replacing lost trees / woodlands / hedgerows with similar species of sufficient size/condition to achieve the gain.</p>
<p>Landscape character</p>	<p><u>Heritage Conservation:</u> It is important that landscape considerations include an assessment of the historic aspect of the landscape in its designation decision-making. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. The Kent Historic Landscape Characterisation Survey (2001) is an important resource for understanding the landscape of Kent and its development through time. The County Council would clarify however that the HLC is a strategic, not local, assessment. It allows us to look at the landscape of Kent and draw conclusions about the development of the landscape in different parts of the county and the county as a whole. It is not detailed enough to use at a large scale. A more detailed assessment of the landscape of Canterbury is required, similar to that has already been carried out for Tunbridge Wells Borough and the Hoo Peninsula. The County Council would be willing to discuss this further with the City Council.</p>
<p>Policy DS22 – Landscape character</p>	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network and National Trails as vantage points within point 2(c).</p>
<p>Policy DS24 – Publicly accessible open space and sports</p>	<p><u>PRoW:</u> The County Council requests specific reference to the PRoW network within point 3(a) and 3(e) and 10(e).</p> <p><u>SuDS:</u> Whilst not necessarily a consideration for inclusion within the local plan we often get push back from some LPAs as to the use of public open space for the management of surface water and if it used as such the space is required to be removed from the public open space allocation. It is therefore particularly encouraging to see that this policy encourages using open space to address surface water. It would be useful though if CCC could confirm to ourselves categorically that the use of open space for surface water management is not done so at the preclusion of the open space allocation or if there would be specific requirements in order to maintain the open space allocation e.g. to only be used for surface water management of events over the 1:30 year rainfall event.</p>
<p>Historic environment and</p>	<p><u>Heritage Conservation:</u> Given the enormous importance of Canterbury’s heritage to its residents, visitors, the nation and the world (as reflected in its World Heritage Site status), the</p>

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<p>archaeology</p>	<p>Council considers that the current text significantly underplays this importance as well as the potential of the district’s heritage to play a formative role in life and wellbeing of its residents. The County Council recommends that the district’s heritage is reviewed so that the age and range of heritage assets can be appreciated by the reader and their potential to contribute to life in the district understood.</p> <p>Paragraph 6.63 notes the existence of a national framework for heritage provided by national policies and implies these, together with policy DS26, are enough to manage Canterbury’s heritage and fulfil its potential – however the County Council considers further detail is required. It is recognised that the City Council has already developed an award-winning Heritage Strategy to help identify and fulfil the potential of the district’s internationally important heritage and yet the Heritage Strategy is not mentioned anywhere in the document. If the intention is to let the Heritage Strategy be the main focus of delivery for the historic environment, then this needs clearly stating in the Local Plan with appropriate links being made in the text. Without it, the single historic environment policy is not considered to be adequate. The County Council expects that Canterbury’s heritage is satisfactorily reviewed, and policies presented for archaeology, Conservation Areas, Listed Buildings and Locally Listed Heritage Assets, Historic Parks and Gardens etc.</p> <p>The County Council requests clarity as to whether the Heritage Strategy has been formally adopted? If it has not, Policy DS26 is not considered to be satisfactory to cover the full range of heritage issues in Canterbury.</p> <p>Irrespective of whether the Strategy was adopted, there is still a need for the Canterbury Urban Archaeological Database (UAD) to be updated. The City developed the UAD in partnership with the Canterbury Archaeological Trust, but it has not been updated since 2007. Although it remains a very important tool for development control, a programme of updating is required. The County Council is willing to engage with the City Council on this matter.</p>
<p>Policy DS26 – Historic environment and archaeology</p>	<p><u>Heritage Conservation:</u> Policy DS26 is a single catch-all policy for the historic environment. Although it includes all the main aspects of the historic environment, including them all in one policy prevents any meaningful presentation of context, or exploration of how heritage issues will be used in a positive way to enhance life in the district. It would be preferable if this policy could be broken down into its key components, being:</p> <ul style="list-style-type: none"> - Archaeology, including World Heritage Site issues - Built heritage, including non-listed buildings, Listed Buildings and Conservation Areas - Historic landscapes, including historic parks and open spaces - Local Heritage Assets. Canterbury does have a large number of locally listed buildings but the Local Plan does not at present explain what this status means or what weight will be given to Locally Listed status. <p>If a single policy is to be retained, then it must include a clause that commits the City Council to delivering the goals and actions presented in the Heritage strategy.</p>
<p>Chapter 7. Development management policies</p>	
<p>Policy DM5 – Parking design</p>	<p><u>Highways and Transportation:</u> This approach within this policy is supported and should be reinforced with the adoption of the parking standards in appendix 4. However, appendix 4 itself does contradict itself in part as the description does suggest a presumption of no parking provided with town/city centre and edge of centre locations. This doesn’t correspond with Table 1 in the appendix, which is assumed to be the correct proposal. It aligns with the draft KCC standards, so would be supported.</p>
<p>Policy DM13 – Biomass technology</p>	<p><u>Minerals and Waste:</u> The County Council notes that this policy sets out the parameters for what would be acceptable for ‘biomass technology’ proposals in planning terms. The County Council as Minerals and Waste Planning Authority considers that this policy is ambiguous and has potential to duplicate Policy CSW 6: Location of Built Waste Management Facilities. Clarity should be provided whether this policy applies to waste and/or non-waste derived fuel systems – it should ideally be reworked to refer to non-waste derived biofuels only.</p>
<p>Policy DM14 – Flood risk</p>	<p><u>SuDS:</u> The County Council recommends that paragraph h includes reference to general amenity within the list of benefits.</p>
<p>Policy DM15 – Sustainable drainage</p>	<p><u>SuDS:</u> Section a states “Achieved to the City Council’s stipulated greenfield runoff rates, mimic natural flows and drainage pathways” The County Council requests clarity as to where to obtain</p>

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	<p>the stipulated green field run off rates and whether this would be in a City Council surface water drainage proforma.</p> <p>Section d requires that evidence be submitted should the argument be presented that the use of SuDS is not appropriate. The Lead Local Flood Authority notes that financial implications are often cited as a reason for not utilising certain suds solutions - it would be beneficial if the requirement for appropriate evidence could be expanded so as to include the requirement for a cost comparison against a standard system so as to clearly demonstrate that the cost implications would make it unreasonable to insist on a certain type of SuDS (blue green roofs would be such a system).</p> <p>The County Council notes that section m requires demonstration as to how SuDS infrastructure will be delivered over the different building phases. KCC recommends the inclusion of the following phase: "This information should include clear details of the various designed allocations, in terms of discharge rates, discharge volumes and impermeable areas for those future building phases".</p>
Policy DM18 – Light pollution and dark skies	<p><u>PRoW:</u> The County Council requests specific reference Point 2 (f) light pollution effect on PROW users.</p>
Chapter 8. Appendices	
Appendix 2: Glossary	<p><u>Development Investment:</u> The County Council recommends inclusion of the following details in respect of changing places - https://www.changing-places.org/install-toilet/design</p> <p><u>PRoW:</u> PRoW – amend to Public Rights of Way include Footpaths, Bridleways, Restricted Byways and Byways Open to all Traffic. A Public Right of Way is a Highway.</p> <p>Reference should also be made to the Kent County Council Rights of Way Improvement Plan (ROWIP).</p>
Supporting Evidence	
Draft Infrastructure Development Plan	<p><u>PRoW:</u> The County Council recommends that this document should also include opportunities provided by the PRoW network to encourage modal shift, especially in consideration of the Local Cycling and Walking Infrastructure Plan (LCWIP).</p>
Open Spaces Strategy	<p><u>Heritage Conservation:</u> The County Council notes that the current text discusses green open spaces but doesn't appreciate the role of Canterbury's heritage in developing green infrastructure. If properly designed, green infrastructure has the potential to help new development be better integrated into the existing rural and urban landscape by ensuring that it fits into the grain of what is already there. The pattern of roads, tracks and lanes in the district has been used for centuries to link Canterbury's towns, villages, hamlets and countryside. By taking advantage of these existing and historic routeways people will be able to move through the area while retaining the historic geography of the region, but also following routes more likely to be accompanied by historic hedgerows and planting. This has the potential to unite heritage and ecology to help people access and enjoy green infrastructure features more easily and naturally.</p> <p>Using historic routeways also allows green infrastructure designers to incorporate heritage assets to provide features of interest. In turn this will help people accessing the green infrastructure to become more aware of and value Canterbury's heritage which will in turn assist their conservation and re-use. For example, areas such as the Stour Valley, coastal promenades and the parks and gardens of Canterbury itself could all be linked in the green infrastructure network. This would also support tourism and well-being in the district.</p> <p>To fully appreciate the district's landscape character and incorporate it into GI effectively, it is first important to understand it. The main method for investigation historic landscape character is by historic landscape characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. An example of this in Kent is the Hoo Peninsula¹.</p>

¹ <https://historicengland.org.uk/research/current/discover-and-understand/rural-heritage/hoo-peninsula/>

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	<p>Green infrastructure also makes an important contribution to health. Historic England has released research that demonstrates how heritage actively supports health and well-being through contributing to a generally more attractive environment, allowing activities that encourage participation and inclusion and by encouraging outdoors activities.</p> <p>Canterbury has an outstanding collection of parks, gardens and green spaces, within Canterbury itself and across the district. It is important to assess the historic contexts of these in order to understand the role that they play in the landscape and could play in Green Infrastructure networks. The County Council has for the past few years worked closely with volunteers from the Kent Gardens Trust to review sites in the Kent Gardens Compendium and elsewhere and bring the reports up to a standard appropriate for use for planning purposes and potentially for inclusion in a Local List. The County Council would recommend that Canterbury City Council also considers implementing a similar project.</p>