



Canterbury City Council  
14 Rose Lane  
Canterbury  
Kent  
CT1 2UR

**BY EMAIL ONLY**

## **Growth and Communities**

Sessions House  
County Hall  
Maidstone  
Kent  
ME14 1XX

Phone: [REDACTED]  
Ask for: Daniel Neave  
Email: [REDACTED]

18 May 2026

Dear Sir, Madam

### **Re: Draft Canterbury District Local Plan – Regulation 19 Consultation**

Thank you for consulting Kent County Council (thereafter referred to as the County Council) on the Draft Canterbury District Local Plan.

The County Council has reviewed the Draft Local Plan and for ease of reference, has provided general comments and then has structured comments under the chapters and policies within the document:

#### **General Commentary:**

##### Highways and Transportation

The County Council, as the Local Highway Authority, welcomes the opportunity to comment on the Canterbury District Local Plan (Regulation 19, 2026), together with the Draft Canterbury District Transport Strategy (2026), the Local Cycling and Walking Infrastructure Plan (LCWIP) and the Bus Strategy Action Plan. The County Council acknowledges the significant further work undertaken by Canterbury City Council (CCC) since Regulation 18, particularly the strengthening of the transport evidence base through the transport modelling jointly commissioned by CCC and the County Council, and the clearer articulation of delivery, monitoring and review mechanisms.

##### Minerals and Waste

The County Council, as the Minerals and Waste Authority, notes that the relevant policy of the plan includes a requirement for a Minerals Assessment as part of any planning application for a new development. The County Council is of the view that this is an

acceptable level of mineral safeguarding as the deposits potentially threatened are marginal. The determination of any necessary prior extraction ahead of development, or any exemption from the presumption to safeguard potentially economically important mineral resources, can be addressed at the planning application stage.

### Culture

The County Council welcomes the Local Plan's reference to a culturally vibrant District and the need to invest in cultural infrastructure. The County Council would, however, like to see more specific requirements in the relevant policies that could be used to attract investment.

CCC has just adopted a new Cultural Strategy which specifically mentions the Local Plan in ambitions 3 and 6. It is therefore requested that the Local Plan should also reference the Canterbury Cultural Strategy to ensure consistency.

### Flood and Water Management

The County Council is pleased to note that its previous comments made under the Regulation 18 submissions appear to have been generally taken on board and included in this Regulation 19 submission.

The County Council, as Lead Local Flood Authority, is generally satisfied that the approach seems appropriate (as required under Regulation 19). The County Council would, however, like to note that there is an issue with Policy DS23 with regards to requirements for enacting the sequential test. This is explained further below under the relevant policy.

### Planning for Health

The County Council considers that the Canterbury Local Plan demonstrates a clear commitment to health and identifies opportunities to strengthen consistency across health-related matters.

The Plan shows a strong aspiration to support healthy and resilient communities to further reinforce these ambitions. The County Council, from a Planning for Health perspective, believes that a dedicated Health and Wellbeing Policy should have been included, which could be informed by local health evidence and aligned with the Plan's vision and objectives. This would help to clearly emphasise and embed the importance of health throughout the document. The Planning for Health officer is happy to work with you to help draft this.

The County Council believes that the following guidance has not been considered and would recommend consideration of them to help in the drafting of such a policy:

- Local Plan support [Planning for healthy places: a practical guide for local authorities on embedding health in Local Plans and planning policies in England](#)
- For local health data [Fingertips | Department of Health and Social Care](#)

The County Council endorses early involvement from public and neighbourhood groups within Local Plan consultation and recommends the [Place Standard Tool](#) as an effective and widely used tool for considering what works well within a place.

The County Council also supports CCC's requirement for Construction Environmental Management Plans (CEMPs) during the construction phase. In addition, the County Council would support the use of Health Impact Assessments (HIAs) for larger developments to consider the health and wellbeing impacts on both future residents and neighbouring communities.

The Local Plan has a key role in creating places that enable people to achieve and maintain a healthy weight. Paragraph 97 of the National Planning Policy Framework (NPPF) provides advice to Local Authorities as to how to approach hot food takeaways and fast-food outlets. The County Council is disappointed to see that CCC has not included a policy within the Local Plan, to encourage healthy food environments and healthy food provision in neighbourhoods, schools, workplaces and retail environments. The County Council would suggest the following guidance and examples to help:

- [Restricting-the-appearance-and-availability-of-junk-food TCPA APSE.pdf](#)
- [Hot food takeaway Supplementary Planning Document - Gateshead Council](#)
- [Public Health Hot Food Takeaway \(HFT\) Guidance](#)

The County Council would be pleased to work collaboratively with CCC to provide relevant data, evidence, and guidance to strengthen the Local Plan and associated policies moving forward.

### Public Rights of Way

As a general statement, the Kent County Council Public Rights of Way (PRoW) and Access Service is keen to ensure that its interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. The County Council is committed to working in partnership with Local Councils to achieve the aims contained within the 'Rights of Way Improvement Plan 2018 – 2028' (ROWIP). The County Council is keen to promote the protection and enhancement of the PRoW network and, experience shows that local planning policy support for the work it does is mutually beneficial in both protecting the network and negotiating enhancements to it, through new development.

The County Council supports the draft Regulation 19 Local Plan and welcomes the amendments made to reflect the PROW network following the County Council's response to the Regulation 18 Plan. However, it is noted that there is still no reference to the County Council's Rights of Way Improvement Plan (ROWIP) and it would emphasise again that its omission could result in the significant loss of access to additional funding and opportunities. The County Council therefore strongly urges the City Council to ensure that reference to the Plan is included. This will enable the successful partnership working to continue to deliver improvements to the District's PRoW network.

**Please see below for further specific comments on the chapters and policies within the Draft Canterbury Local Plan Consultation:**

## **Chapter 1 – Spatial Strategy for the district**

### **Vision for the District**

#### **Culture**

The County Council welcomes the reference in the vision to a culturally vibrant District and the need to invest in cultural infrastructure.

#### **Energy and Adaptation**

The County Council is pleased to see that climate change adaptation is included in the Vision for the District and in bullet points 5, 6 and 12 of the Strategic Objectives and supports this positive approach.

#### **Heritage and Conservation**

The County Council is disappointed to see that “an enhanced historic environment” has been removed as a goal for the Vision since the Regulation 18 consultation and would ask that it be reintroduced. Canterbury’s exceptional historic environment is one of its greatest assets and it is essential that it is conserved, enhanced and respected if the new growth is to be embedded successfully into the urban centre. Whilst the Sustainable and Resilient Economy section states that; *“Investment in the city, our coastal towns and the rural areas will ensure the district’s historic and natural environment can thrive,”* it does not guarantee that it will. The previous commitment to enhancing the historic environment was much stronger. Heritage can also play a key role in creating “a thriving environment”, so the County Council would suggest the text be modified to add; *“our coastal towns, “our important and historic habitats and landscape.” and the rural areas...”*

The County Council supports the strategic objective of *“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.

### **Policy SS1 – Environmental Strategy for the district**

#### **Heritage and Conservation**

The County Council is pleased to see the strong commitment to the enhancement of the historic environment in this section. The County Council is also pleased to see the County

Council's Heritage Strategy referred to and particularly the delivery plans which will need to be fully resourced if they are to be delivered.

#### Energy and Adaptation

The County Council would ask that the Environmental Strategy reference the benefit of tree cover for adaptation purposes, as well as the need for water efficient development.

### **Policy SS2 – Sustainable Design Strategy for the district**

#### Culture

The County Council would request that culture and cultural activity are added to the uses for the community hub in paragraph 1.32.

In addition, the County Council would like to see references to culture and cultural activity in paragraphs 5 and 7 of the policy.

#### Energy and Adaptation

The County Council would ask that Design includes reference to overheating mitigation in point 1.

#### Development Investment

The County Council notes that this policy seeks to promote high-quality and sustainable design across the district. The County Council is currently progressing an update to the Kent Design Guide, which CCC has been actively involved in during its preparation. The updated Guide will reflect current best practice in relation to place-making, movement, accessibility, and the delivery of inclusive and resilient environments.

For clarity and effective implementation, the County Council considers it would be helpful for the Local Plan to more clearly acknowledge the role of the Kent Design Guide (as updated) as a material consideration in the determination of planning applications. This would ensure that development proposals are designed to meet the expectations of both the District and County Councils, and provide a consistent basis for assessing matters such as layout, accessibility, movement, and the integration of community infrastructure.

The County Council supports the intent of Policy SS2 and considers that clearer signposting to the Kent Design Guide would strengthen the policy and assist applicants and decision-makers in delivering sustainable development in practice.

#### Heritage and Conservation

The County Council welcomes the prominence given to Canterbury's outstanding historic environment in para 1.29, and the recognition of both 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.

With regard to paragraph 1.30, it is noted that 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 often 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). The County Council would ask that this could usefully be highlighted in the text, which at present suggests the brunt of making housing energy efficient must only be borne only by new buildings.

With regard to paragraph 1.33, 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. Please see the County Council’s comments under Landscape Character below.

### Planning for Health

The County Council welcomes Canterbury’s recognition of the environment as a vital asset for health and wellbeing. The inclusion of the Green Infrastructure, Open Spaces, and Playing Pitch Strategies is welcomed, as these provide further support for residents’ health and wellbeing and improve access to inclusive opportunities for physical activity.

The County Council also welcomes the inclusion of the Sport England Active Design principles and Building for a Healthy Life within new developments. It also recommends applying additional guidelines that prioritise health and place at the forefront of design. Please find relevant guidance below:

[Spatial Planning for Health: an evidence resource for planning and designing healthier places](#)

[Securing Healthy Homes at the local level](#)

## **Policy SS4 – Economic Strategy for the district**

### Culture

The County Council recommends that in paragraph 1.51, CCC should reference its Cultural Strategy. This recognises the growth potential of the creative industries as one of the sectors identified in the Government’s Modern Industrial Strategy, and as a fundamental cornerstone of the tourism economy via museums, theatres, festivals and the night time economy.

## **Policy SS5 – Movement and Transportation Strategy for the district**

### Energy and Adaptation

From an Energy and Adaptation perspective, the County Council believes that a policy for solar EV charging car ports should have been considered, with potential battery storage in car parks, at the bus station and also at the bus stops for electric buses.

### Highways and Transportation

The County Council broadly supports the strategic direction set out in Policy SS5 and the accompanying Draft Canterbury District Transport Strategy. The policy establishes a clear, long-term ambition to achieve a substantial modal shift away from private car use towards walking, wheeling, cycling and public transport, consistent with national policy, DfT Circular 01/2022 and Kent County Council's Local Transport Plan 5.

The County Council welcomes the adoption of a vision-led approach to transport planning and the explicit move away from traditional predict-and-provide methodologies. The Transport Strategy recognises the physical constraints of Canterbury District, particularly the historic city centre and limited highway capacity, and appropriately seeks to manage demand rather than expand road capacity as the primary response to growth.

The County Council also notes that parking standards play an important role in supporting the modal shift objectives of Policy SS5. In this context, the County Council notes that the draft Plan currently reflects earlier versions of the [Kent Vehicle Parking Standards](#), and that there may be scope to update these through the plan-making process to ensure general alignment with the most recent standards where appropriate. The County Council would support a proportionate approach to this through modifications, recognising that parking provision is an important component of the overall demand management strategy.

The County Council strongly supports the "Vision and Validate" approach embedded within Policy SS5 and the Transport Strategy. The strategic transport modelling, jointly commissioned by CCC and the County Council, provides a robust and proportionate evidence base to test the implications of the proposed growth strategy and potential mitigation measures across the plan period.

The County Council notes, however, that the modelling represents an informed strategic scenario rather than a fixed or guaranteed future. Outcomes remain dependent on assumptions relating to behavioural change, infrastructure delivery and the effectiveness of demand management measures. In this context, the County Council considers the commitment to monitoring travel behaviour, mode share and network performance to be essential, and stresses that monitoring outputs must meaningfully inform decision-making and intervention where required.

While the County Council supports the ambition of Policy SS5, it remains appropriately cautious that the strategy's success is highly dependent on the timely and coordinated delivery of sustainable transport measures. In particular, early provision of high-quality public transport, bus priority infrastructure, continuous walking and cycling routes and Park and

Ride / Park and Bus facilities will be critical to embedding mode shift from the outset of development.

The County Council considers that phasing of both development and infrastructure delivery must remain under active review throughout the plan period. Any delay or dilution of sustainable transport measures risks locking in car-based travel patterns that would be difficult to reverse.

### Planning for Health

The County Council welcomes the prioritisation of sustainable transport and the promotion of active travel over private car use. Improvements to walking and cycling routes, alongside the promotion of cycle hire and park and ride, represent a positive step towards creating an environment that supports active travel.

## **Policy SS6 – Infrastructure Strategy for the district**

### Culture

The County Council suggest that a reference to cultural infrastructure is added in paragraph 1.71 and strongly recommends the addition of cultural infrastructure in policy SS6.

### Development Investment

The County Council welcomes the Infrastructure Strategy for the District and Policy SS6, which accurately identifies the education infrastructure required to support the scale and distribution of growth proposed within the Local Plan. The education infrastructure listed reflects the advice provided by the County Council during plan preparation and demonstrates that these requirements have been appropriately embedded within the strategic framework of the Plan.

The County Council supports the recognition of new and expanded primary, secondary and special educational needs provision as critical infrastructure necessary to enable sustainable development. Policy SS6 therefore provides a clear and sound articulation of what education infrastructure is required over the plan period.

The County Council's comments elsewhere in this response in relation to Policy DS15 relate not to the identification of infrastructure, which is appropriately addressed through Policy SS6, but to the clarity of the mechanisms by which that infrastructure is to be delivered and funded. In this context, the County Council considers that Policy SS6, when read alongside a clarified Policy DS15, would provide a robust and effective framework for the delivery of education infrastructure across the district.

## **Policy SS7 – Local Plan Review**

### Highways and Transportation

The County Council strongly supports Policy SS7 and considers it fundamental to the credibility of the transport strategy. This policy provides the necessary mechanism to respond where monitoring indicates that transport outcomes, infrastructure delivery or behavioural assumptions are not being achieved.

The County Council welcomes the explicit recognition that adaptation and review may be required over the life of the Plan.

## **Strategic Site Policies – General Comments**

### Development Investment

Strategic site policies which include school site provision are: Policy C10 - Land at Merton Park, Policy C15 - Land south of Littlebourne Road, Policy C16 - Land south of Bokesbourne Lane, Policy W4 - Land at Brooklands Farm, Policy W7 – Bodkin Farm and Policy HB5 - Land to the West of Thornden Wood Road.

KCC seeks to amend the wording to:

*“Land sufficient to accommodate a primary/secondary/SEND school shall be safeguarded within the site and transferred to Kent County Council (or its successor/nominee) at **nil consideration** in accordance with Kent County Council’s General Transfer Terms. The timing of transfer shall be agreed with the Local Education Authority, having regard to pupil yield, the phasing of development and the wider education commissioning strategy for the area.”*

This is to ensure that land is transferred at the appropriate time and is not sought too early, creating risks for the County Council.

## **Chapter 2 – Canterbury**

### **Policy C1 – Canterbury City Centre Strategy**

#### Heritage and Conservation

The text for this policy could usefully refer to the [Kent Heritage Conservation Strategy](#). This is a document jointly produced by KCC Heritage Conservation and Highways officers, the Kent Conservation Officers Group, and the Kent Design Guide. Originally adopted in 2001, it was updated in 2011 and is currently being revised. It looks beyond the statutory requirement to conserve individual assets. The protocol considers Heritage Sensitive Situations defined as buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of significance meriting consideration in planning decisions. It

is thus a source of guidance for Kent's Highways officers, developers, and others engaged in designing and maintaining Kent's current and future highway assets.

## **Policies C10-C14 – South West Canterbury Strategic Development Area**

### Highways and Transportation

The County Council welcomes the comprehensive transport package proposed for the South West Canterbury Strategic Development Area, including Policy C10 (Land at Merton Park). The integration of bus priority measures, a new Park and Bus facility, extensive walking and cycling improvements and enhanced access to Canterbury East railway station provides a strong basis for supporting sustainable travel.

The County Council emphasises that early delivery of the Park and Bus facility and bus-based interventions will be critical to managing trip generation and achieving the intended mode shift.

## **Policies C15-C17 – East Canterbury Strategic Development Area**

### Highways and Transportation

The County Council supports the role of transport infrastructure in enabling the East Canterbury Strategic Development Area, including the proposed A257–A2 link road, Park and Bus facility, enhanced bus services and strategic active travel corridors.

The County Council notes that coordinated delivery and phasing across the East Canterbury sites will be essential to ensuring that mitigation is delivered comprehensively and in step with development. Detailed transport assessment will be required at application stage to confirm deliverability in line with the strategic modelling assumptions.

## **Chapter 3 – Whitstable**

### **Policy W2 – Whitstable Harbour**

#### Minerals and Waste

The County Council considers that this policy recognises that the mineral importation facility is an established feature of the facilities of the working harbour. The County Council feels that policy does not ask for details that inform potential developers. These details are that the mineral importation wharf is safeguarded and any development within 250m of the wharf would have to meet the relevant requirements of Policy DM 8: Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities of the adopted [Kent Minerals and Waste Local Plan 2024-39](#).

The submission of an Infrastructure Assessment (IA) to demonstrate compliance with the above policy provision, accompanying any planning application for development within 250m of the wharf, would normally be how mineral infrastructure safeguarding matters can be addressed at the planning application stage. Any development within the 250m area of the wharf is currently undefined and therefore un-assessable, the policy (W2-Whitstable Harbour) should be explicit on this requirement.

## **Policies W4-W7 – South Whitstable Strategic Development Area**

### **Highways and Transportation**

The County Council supports the bus-led and active travel-focused approach proposed for South Whitstable. Given existing congestion pressures on the A299 corridor, the County Council considers the Park and Bus facility, rail station enhancements and improvements to the Crab and Winkle Way to be particularly important.

The County Council stresses the need for continued monitoring of network performance in this area to inform whether additional or accelerated mitigation may be required.

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

### **Culture**

The County Council would ask that a specific policy for culture is added, using the Kent Cultural Strategy as a foundation. The policy should match the breadth of content in Policy DS28 Publicly accessible open space and sports and Policy DS10 - Tourism development.

## **Policy DS4 – Rural housing**

### **Heritage and Conservation**

With regard to paragraph 6.23, 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. The County Council is pleased to see the Kent Downs AONB Farmstead Guidance referred to here.

The County Council also supports clause 3 (a - c) of the policy that encourages re-use of heritage assets. In line with the comments above, the County Council also supports clauses d (4) and f (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 DS5 – Specialist housing provision**

### Development Investment

The County Council notes that paragraph 6.26 of the supporting text to Policy DS5 encourages developers to engage with CCC in relation to the types of older person housing required within the district, including matters relating to design and technology, in order to address under-provision and meet identified needs. This inclusion is welcomed by the County Council. It should be noted, however, that 'older person' housing is just one type of specialist housing for adults with additional needs. Specialist housing in this context relates to the needs of adults with a range of specialist requirements, including but not limited to older persons, adults with disabilities, and those requiring supported or extra-care accommodation.

This expectation is not explicitly reflected within the wording of Policy DS5 itself. For clarity and effective implementation, the County Council considers that the policy would benefit from more clearly embedding this requirement within the policy wording, rather than relying solely on supporting text. This would provide greater certainty to applicants and decision-makers and help ensure that proposals for specialist housing are informed by the County Council's evidence base, commissioning responsibilities and statutory duties.

## **Policy DS8 – Education and associated development**

### Development Investment

The County Council has previously advised CCC as follows (4 December 2023):

*"The Local Plan is predicted to create an additional 655 early years pupils. Sufficiency assessments have been conducted and whilst there are small surpluses in the City and Whitstable Planning Groups, the introduction of increased Early Years Entitlements from April 2024 is expected to take up these places.*

*KCC will be providing 52-Place Nurseries (Nurseries run on a sessional basis, taking 26 children in the morning and 26 in the afternoon) within each new school setting, with the build cost for these built into the Primary Education contribution rates. The Local Plan should make provision also for three additional, Full-Day Care settings for 45-60 children each to meet the remaining requirement for Early Years places. Ideally, these should be provided near to a primary school setting, to support parents dropping off multiple children and reduce trip movements. Alternative locations could be local facilities/market centres. Whilst there is an opportunity for community centres to provide some of the requirement, it should be noted that safeguarding requirements mean that this space needs to be dedicated to the nursery/early years facility, including external space.*

*It is expected that the three facilities will be leased on a commercial basis. "*

The County Council has identified a requirement for additional private Full-Day Care early years provision to meet residual demand arising from growth and changes to Early Years Entitlements. Whilst this provision is expected to be delivered by the private sector on a commercial basis, the Local Plan does not currently provide clear policy support to enable or

facilitate its delivery, particularly in terms of location, safeguarding requirements and the need for dedicated space. Greater clarity would assist effective implementation.

### **Policy DS9 – Town centres and community facilities**

#### Culture

In paragraph 15, the County Council recommends adding cultural activity.

### **Policy DS12 – Net zero carbon ready and water efficiency**

#### Energy and Adaptation

The County Council supports this policy. Extensive detail has been provided on addressing all climate risks, and this is strongly supported by the Sustainable Design Guidance which elaborates on mitigation measures, including those in accordance with the cooling hierarchy. Potential examples on achieving a water consumption limit of 110l/p/d could be included either in this policy, or Policy DS24 - Sustainable Drainage and Water Quality alongside rainwater harvesting, such as greywater recycling, however, overall the County Council strongly supports this policy.

### **Policy DS13 – Sustainable Design**

#### Heritage and Conservation

The County Council welcomes clause 3 (a) that requires developers to design their projects with heritage and local character in mind, although it is not clear from the text if the Design Codes referred to in clause 2 must include this. 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. It is important 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 4 (b) should, where appropriate, also include heritage aspects in the form of community archaeology. Section 106 Agreements (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.

### **Policy DS15 – Infrastructure Delivery**

#### Development Investment

The County Council welcomes the introduction of a viability review mechanism to ensure that where a development is capable at a later date of paying s106/Community Infrastructure Levy (CIL) contributions, that it does so. While it is advised that the viability appraisal will be

published alongside the planning application documentation, the County Council would ask that this be in its full form and made available.

The County Council also notes that there are inconsistencies in the wording of this policy with the Infrastructure Delivery Plan (March 2026) and CIL Infrastructure List (March 2026).

The Local Plan Policy DS15 states:

Paragraph 6.73 (page 261) *“For larger development sites of 300 or more homes, for greenfield site allocations at Whitstable and for the site allocations at Policy CF1, Section 106 planning obligations will be used to secure appropriate mitigation for all types of infrastructure provision, in line with the statutory tests.”*

The CCC's draft Infrastructure Delivery Plan (March 2026) says:

Paragraph 11.3 *“New strategic development sites over 300 dwellings and greenfield allocated sites in Whitstable, as set out in the Infrastructure List, will make contributions to community infrastructure through Section 106. Contributions from other development sites will be collected via the CIL.”*

The draft CIL Infrastructure List (March 2026) shows the Special Cabinet report of 18 March 2026 (page 500) and states within Section 2. Infrastructure List:

|           |                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                    |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Education | <u>Land Costs</u><br>Provision of and/or financial contributions towards land for the delivery of secondary, primary and SEND education infrastructure.<br><br><u>Build Costs</u><br>Primary, secondary and SEND education infrastructure required to support delivery of the Strategic Development Sites and any other development of 300 or more homes. | <u>Build Costs</u><br>Primary, secondary and SEND education infrastructure required to support the delivery of development sites which are not Strategic Development Sites and any other development of fewer than 300 homes and to address the cumulative impacts of development in the district. |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

For clarity, and to ensure effective and lawful implementation, the County Council would ask that these documents are consistent to make clear where S106 and/or CIL contributions are to be paid for different elements of infrastructure necessary to mitigate the demand created.

In addition to the above, the County Council also considers that wording within individual development site policies has been amended from the following Regulation 18 example:

Policy C10 (formally Policy C6) Land at Merton Park para 1 (b) viii:

*“Proportionate land and build contributions towards early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure.”*

To

*“vii. Proportionate contributions to community infrastructure in line with DS15”.*

In order to ensure that the revised wording does not dilute the intent of the former Regulation 18 policy, the County Council considers that Policy DS15 would benefit from further

clarification. In particular, it is the view of the County Council that the policy is currently ambiguous in relation to which types of development are expected to contribute towards specific infrastructure requirements and whether this is to be secured through section 106 planning obligations, the CIL, or a combination of both.

As drafted, developers are required to cross-reference multiple documents, including the Local Plan, the Infrastructure Delivery Plan and the CIL Infrastructure List, in order to ascertain whether s106 and/or CIL contributions will be sought and the types of infrastructure to which contributions will be directed. The County Council considers that greater clarity within Policy DS15 itself would assist effective implementation, provide certainty to developers and infrastructure providers, and reduce the risk of inconsistent interpretation at the planning application stage.

The County Council also notes that Policy DS15 (Infrastructure Delivery) is not referenced within a number of site-specific development policies, including smaller site allocations. Whilst the Infrastructure Delivery Plan establishes an approach whereby section 106 planning obligations are primarily anticipated from strategic development sites and development of 300 dwellings or more, with other development contributing through the Community Infrastructure Levy, this distinction is not explicitly reflected within the Local Plan policy framework.

In addition, the approach set out in paragraph 6.73 of the supporting text, which explains where S106 planning obligations will be used to secure mitigation for different types of infrastructure provision, is not clearly translated into the wording of Policy DS15 itself. As a result, it is unclear from the policy how infrastructure requirements, including proportionate land contributions for new primary school provision where necessary to mitigate the impacts of development, are intended to be secured.

For clarity and effective implementation, it would be helpful for the Plan to make clear within Policy DS15 that its principles apply to all development proposals and to more clearly articulate the relationship between s106 planning obligations, CIL and the types of infrastructure to which contributions will be directed.

### Public Rights of Way

The County Council welcomes the amendment to include specific reference to the PROW network.

## **Policy DS16 – Movement Hierarchy**

### Highways and Transportation

The County Council supports Policies DS16 and DS17, which build on the Movement Hierarchy identified in Policy SS5. These policies provide a clear expectation that development proposals will prioritise walking, wheeling, cycling and public transport through site design, layout and mitigation.

The County Council notes that consistent application of these policies through development management will be essential to ensure that site-specific proposals align with the strategic assumptions tested within the transport modelling.

For non-strategic allocations and windfall development, the County Council expects proposals to align with the Movement Hierarchy, minimise reliance on the private car, and deliver proportionate mitigation in response to prevailing conditions and monitoring evidence at the time of application.

## **Policy DS17 Active and sustainable travel**

### Public Rights of Way

The County Council welcomes reference to Public Rights of Way (PROW) within DS17 - Active and sustainable travel and the intention to ensure developments. This does not only retain existing routes, but also improves off-site routes to ensure high-quality connectivity and accessibility where necessary to ensure PROW users' safety, convenience and enjoyment. However, the County Council notes that there is no inclusion of a separate and additional Policy focused on PROW; as requested in the County Council's Regulation 18 consultation response. The Service considers it essential that PROW should be understood as a separate topic (albeit over-arching many of the Plan's ambitions and policies) given the different and specific processes and considerations within statutes and practice for creating, diverting, and managing PROW; also for the regard PROW access has within local communities and for the emphasis within the Plan for walking and cycling, many opportunities for which will rely on the PROW network. The County Council is disappointed to see that a specific PROW Policy has not been included. This policy is recommended to be DS17A - Active and sustainable travel. Inclusion would ensure a consistent framework of guidance for all, but particularly developers and public users. This would allow them to consider development proposals and their effects on off-road access - having a clear, holistic understanding and ensuring, for example, neighbouring developments complement rather than contradict each other. This will ensure the Plan's ambitions are met efficiently and future users' amenity and experience is properly considered.

The County Council reiterates the suggested specific Policy as follows:

### *DS17A - Public Rights of Way (PROW)*

Planning permission will be granted for development which meets the following criteria:

1. An access and transportation strategy should be prepared for the site regardless of its size and should:
  - (a) Identify all existing PROW within the site;
  - (b) Identify the existing PROW network outside of the site boundary that reasonably could be used by future site occupants to access services, neighbouring communities, and the countryside as applicable in addition to use for personal wellbeing and exercise;
  - (c) Improvements both within and outside of the site should be proposed so as to enhance and ensure PROW users' safety, convenience and enjoyment, and to

minimise the need for use of private cars in response to climate change. Where connections to neighbouring developments are identified, Applicants are expected to co-ordinate provision, preferably by formal means, with each other to ensure PROW users' safety, convenience and enjoyment are maximised, and to ensure seamless provision of facility and standards;

- (d) State how improvements identified in (c) above are expected to be funded;
- (e) State a timetable for delivery of improvements identified in (c) above.

The County Council's response to the Regulation 18 Draft Canterbury District Local Plan provided detailed site specific comments which remain valid.

## **Policy DS18 – Highways and Parking**

### Highways and Transportation

The County Council supports Policy DS18 and considers it to provide an appropriate framework for securing proportionate mitigation, Transport Assessments, Travel Plans and parking restraint in accessible locations. The County Council notes that the cumulative impact of multiple developments will require ongoing consideration, informed by monitoring outcomes as development is delivered.

The County Council notes that the proposed Parking Standards set out in Appendix 3 are stated to be based on Kent County Council's 2021 draft parking standards. However, the County Council has since formally adopted updated Parking Standards in January 2025, which supersede all previous guidance. These standards now form the current basis for assessing parking provision across the County and reflect up-to-date national policy, evolving travel behaviours, and modern design considerations.

Whilst it is acknowledged that many of the differences between the 2021 draft standards and the adopted 2025 standards may be relatively limited in quantitative terms, the continued reliance on superseded draft guidance introduces a risk of inconsistency with current Local Highway Authority policy. This may not fully reflect the most recent approach to parking provision, including matters such as electric vehicle infrastructure, accessible parking, and design-led parking layouts.

In this context, the County Council considers that Appendix 3 should be reviewed and, where appropriate, updated to ensure general alignment with the adopted 2025 County Council's Parking Standards. Where any departures from the current standards are proposed, it would be beneficial for these to be clearly justified within the Local Plan to ensure transparency and consistency in the application of parking requirements across the District.

The County Council also notes that both the Local Plan and the adopted standards recognise the importance of flexibility in parking provision, with site-specific considerations, accessibility to sustainable transport modes, and local circumstances continuing to be key factors in determining appropriate parking levels. The ongoing role of Transport Assessments and Travel Plans in supporting and justifying parking provision is therefore supported.

## **Policy DS19 – Air quality**

### Highways and Transportation

The County Council welcomes Policy DS19, which integrates transport planning with air quality objectives, particularly within Air Quality Management Areas, and supports the requirement for mitigation where transport-related impacts are identified.

## **Policy DS23 – Flood risk**

### Flood and Water Management

The County Council would advise that under this policy, an amendment is required in that it currently states under paragraph 2:

*“Proposals for new development on sites within Flood Zones 2 and 3 and sites larger than 1ha in Flood Zone 1 are required to undertake the Sequential Test.”*

This is a misapplication of the requirements for when a Flood Risk Assessment is to be supplied.

The current guidance found [here](#) states that a sequential test is required for any major or non major development:

- in Flood Zone 2 or 3 - see [flood map for planning](#)
- in Flood Zone 3b and your development is not incompatible
- within ‘Flood Zones plus climate change’, showing it is at increased risk of flooding from rivers or sea in future – see the [flood map for planning](#)
- within Flood Zone 1 and the [flood map for planning](#) shows it is at risk of flooding from surface water
- in Flood Zone 1 and the LPA's SFRA shows it will be at increased risk of flooding during its lifetime
- subject to sources of flooding other than rivers or sea

The County Council is particularly pleased with the content under paragraph 4c which mentions the requirement for developers, where possible, to provide betterment in association with new development from a Surface Water Management perspective.

## **Policy DS24 – Sustainable Drainage and Water Quality**

### Flood and Water Management

The County Council is pleased to note that the latest local plan requires that in association with development proposals (paragraph 6.133):

*“Surface water should be managed in line with the hierarchy set out below and should reflect both national guidance and that produced by Kent County Council as the Lead Local Flood Authority.”*

The hierarchy provided reflects what is required nationally and places onus on developer's to consider water re-use as the principle method for managing surface water. This ultimately assists with both flood risk and helping to reduce demand on existing infrastructure. This is further strengthened by paragraph 6.134.

The County Council is further pleased to note item 1 of Policy DS24 - Sustainable Drainage and Water Quality and item 2c of Policy DS24 which clarifies that SuDS provision does not preclude 'the use' of an area as publicly accessible open space subject to meeting the requirements of Policy DS28.

The consideration of development proposals to further enhance the existing water environments and ecosystems as part of this policy item is further welcomed as well as is the requirement for any proposals to not compromise Water Framework Directives or lead to contamination of groundwater and drinking water sources.

Whilst technically outside of the Flood and Water Management service's remit, in that it relates to potable water and not surface water, the County Council notes that paragraph 5 of Policy DS12 - Net zero carbon ready and water efficiency, requires that:

*“Proposals for new residential development must meet the design water consumption higher water efficiency standard as set out in the latest edition of the Building Regulations (currently 110 litres per person per day, Building Regulations 2015 Edition) or subsequent updates.”*

Whilst understanding that this is the 'national requirement', given that "the district is within a water stressed area", the County Council wishes for this to be set lower.

### Heritage and Conservation

The County Council is pleased to see that the potential impact on heritage assets should be considered during the design of SuDS. 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 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.

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. The County Council has recently produced guidance for SUDS and the historic environment. 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.

## **Policy DS25 – Supporting biodiversity recovery**

### Energy and Adaptation

The County Council supports the reference to adaptation in respect of planting species in point 2b of Policy DS25 - Supporting Biodiversity Recovery, as canopy cover is important to provide cooling and flood management.

## **Policy DS30 – Historic environment and archaeology**

### Heritage and Conservation

The County Council considers that the current text is significantly stronger than its predecessor, which is welcomed. However, it still focuses heavily on the World Heritage Site. This is, of course, a crucial element in the district's historic environment and is globally important. This must be handled with great sensitivity being located as it is in the heart of an important city with its own needs for growth and development. Nevertheless, the heritage of the District is much more widespread than this with numerous heritage assets spanning hundreds of thousands of years. Many of these have meaning and significance for the communities in which they lie and it would be helpful if this could be reflected rather better in the text.

With regard to paragraph 6.173, the text refers to Locally Listed Buildings (LLBs) but it is the County Council's impression that no LLBs have been added for some years. If this is not the case then it is important that the KCC Kent Historic Environment Record team be notified of any additions so that they can be included in the Historic Environment Record (HER) and thereby made available to those preparing development proposals. It should also be noted that local listing can benefit more types of heritage asset than just buildings. Most local lists now include archaeological sites and landscape features in addition to built structures.

It should also be noted that within Canterbury city itself, the management of the archaeological resource is based on the Canterbury Urban Archaeological Database (UAD). CCC 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, it is therefore now out of date and a programme of updating is required. The project also missed the key phases of Characterisation, which makes the raw data comprehensible, and the development of an Archaeological Strategy, which would help CCC manage the archaeological resource in the city. The County Council would recommend CCC work with Kent County Council on this and would be very happy to discuss this further.

## **Chapter 9 – Monitoring Indicators**

### **Culture**

The County Council recommends including indicators for culture which include cultural attendance, cultural participation and investment in new facilities.

## **Supporting Documents**

### **Appendix 1: Glossary**

#### **Culture**

The County Council recommends to include cultural strategy, cultural infrastructure and cultural activity as glossary terms. These terms are defined as follows:

##### *Cultural Strategy*

A cultural strategy is a structured plan that sets out how a place will develop, support, and promote culture and the creative economy to achieve social, economic, and civic goals.

Canterbury City Council Cultural Strategy was formally adopted by the Council in 2026.

It typically:

- Defines a vision and priorities for arts, heritage, cultural activity and creative economy
- Identifies how cultural assets (e.g. venues, artists, traditions) will be supported
- Aligns culture with broader objectives such as place-making, wellbeing, regeneration, and economic growth
- Outlines actions, partnerships, and investment priorities and expected outcomes.

In short, it is a roadmap for using culture as a driver of positive change and identity.

##### *Cultural Infrastructure*

Cultural infrastructure is the buildings, structures, and places where culture is either consumed or produced. We call them cultural consumption and cultural production spaces.

Cultural consumption spaces include cinemas, galleries, museums, music venues, dance performance spaces and theatres. They may also include multi-use venues such as community centres, school halls, village halls and pubs. These buildings are complex because they must accommodate how activity is presented and the audience. They have technical requirements, specific health and safety and access requirements and back office spaces for administration and deliveries.

Cultural production spaces include film and music studios, artist studios, rehearsal rooms, hi-tech office spaces for createch. Cultural production support the creative and cultural economy. All cultural disciplines depend on some form of production space before they are ready to engage with a wider audience.

### *Cultural Activity*

Cultural activity encompasses a broad range of creative, artistic, and heritage-based practices, spanning from professional visual and performing arts to grassroots community creativity. It includes activities like visiting museums and libraries, engaging in music and film, participating in local festivals, and using community spaces for artistic production like community choirs and craft groups.

It can be broken down as follows:

- 📄 **Arts & Entertainment:** Theatre, dance, music performances, and visual arts.
- 📄 **Heritage & Tradition:** Visits to museums, galleries, libraries, and archives.
- 📄 **Everyday Creativity:** Local community activities, including amateur arts, crafts, and neighbourhood cultural events.
- 📄 **Infrastructure & Venues:** Cultural activity takes place in spaces like cinemas, pubs, and community centres, as well as dedicated studios for artists

Cultural activity plays an important role in the quality of life people experience and improving their health and wellbeing. It supports people out of loneliness and creates social cohesion. It makes places vibrant and desirable to live.

## **Draft Infrastructure Delivery Plan**

### Development Investment

Paragraph 11.6 and 11.7 Waste – the County Council welcomes the inclusion of Waste Disposal and Recycling infrastructure in the IDP, which was omitted in the Regulation 18 consultation

Table 14.3 – Land south of Bokesbourne Lane (C16) Key Infrastructure - The delivery timescale/trigger for the primary school does not accord with the policy within the Local Plan policy for this site. The IDP records transfer by 25% occupations and the Local Plan states within 100 occupations (Policy C16, paragraph 5.g.).

Table 15.1 – Regulation 19 draft local plan: key infrastructure schemes - this does not set out the base date for estimated s106 contributions or estimated total costs for education infrastructure. KCC provided costs and s106 contribution rates based at Q1 2022.

Schedule B Education - Within IB1, IB2 and IB3, the column titled “Development which is dependent on delivery” – should reflect the wider provision for pupils arising from rural

locations surrounding Canterbury, such as Bridge, which will be reliant on provision within these new primary schools.

## **Bus Strategy Action Plan**

### Highways and Transportation

The County Council supports the Bus Strategy Action Plan and recognises that achieving the scale of modal shift envisaged in Policy SS5 and the Transport Strategy will be heavily dependent on service reliability, journey time competitiveness, affordability and passenger experience. Continued partnership working between CCC, the County Council, bus operators and neighbouring authorities will be essential to delivery.

## **Local Cycling and Walking Implementation Plan (LCWIP)**

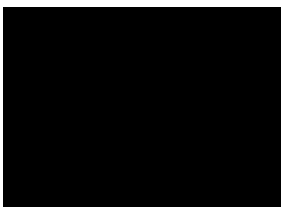
### Highways and Transportation

The County Council welcomes the preparation of the Canterbury District LCWIP and its formal role within the Local Plan evidence base. The LCWIP provides a clear spatial framework for prioritising strategic walking and cycling routes, linking existing settlements, strategic development areas and key trip generators.

The County Council supports the integration of the LCWIP with the Transport Strategy and growth strategy; however, it notes that delivery of the identified routes will be dependent on long-term funding availability, highway corridor reallocation in constrained locations, and public acceptability. The County Council therefore emphasises the importance of treating the LCWIP as a living document that can be refined and reprioritised in response to monitoring data, delivery experience and demonstrated demand. Early delivery of on-site and connecting active travel infrastructure within strategic development areas will be particularly important.

---

Yours faithfully



Simon Jones

Corporate Director – Growth, Environment, Transport