

Draft Canterbury District Local Plan – Regulation 19 Publication

Regulation 19 The Town and Country Planning (Local Planning) (England) Regulations 2012
Planning and Compulsory Purchase Act (2004)

Introduction and context

This is the final draft stage of the Local Plan's preparation before we submit it to the Government for Examination by an Independent Planning Inspector.

At this Regulation 19 stage, we are inviting representations on whether the plan is legally compliant and sound. These are specific tests that the Planning Inspector will use to examine the plan as set out in legislation and national policy.

What does this mean?

Your representations should explain whether you think the plan is:

- Positively prepared: That it meets the district's housing and development needs (based on evidence)
- Justified: That it provides an appropriate strategy (compared to reasonable alternatives)
- Effective: That it is deliverable over the plan period
- Consistent with national policy and legal requirements

For full guidance on how to submit your representation, please use this link:

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/103506>

Your representations will be passed to the Planning Inspector, so it is important that you tell us whether you think the plan meets these tests and why. If you think changes are needed to make the plan legally compliant or sound, please set out what specific changes you would propose.

What's in the plan:

The Local Plan sets out the long-term vision and planning policies for Canterbury District, including:

- Strategic policies for Canterbury, Whitstable, Herne Bay and the rural areas
- Site allocations for housing, employment and other development
- Policies on sustainable design, transport, infrastructure and the environment
- Development management policies

All comments received through our previous consultations (2020-2025) have been carefully considered in preparing this final draft.

We're also consulting on the Habitats Regulations Assessment, Sustainability Appraisal of the draft Local Plan and the Sustainability Appraisal of the Strategic Land Availability Assessment.

Following this eight-week consultation, the Local Plan and all representations will be submitted to the Secretary of State. An Examination is expected to begin in late 2026, with adoption of the Local Plan anticipated by December 2027.

We are required to publish the responses we receive, including your name and the name of the organisation, body or person you are representing. Please do not include information in your comments unless you are happy for it to be published. We may also share your data with the Planning Inspectorate.

Questions that must be answered are marked with an asterisk (*)

Contact information

Your first name: *	Richard
Your surname: *	Thompson
Your email address: *	REDACTED
House name/number: *	REDACTED
Street: *	REDACTED
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Your postcode: *	REDACTED

1. Are you responding as...? * Please tick one box only

CPRE Kent. We represent 1,061 individual members across the county, together with 131 parish councils, including 13 within Canterbury district itself.

2. Would you like to be notified of the following stages of the Canterbury District Local Plan?

* Please tick all that apply

Please keep CPRE Kent informed at each stage

3. Would you like to appear at the Independent Examination?

☒ Yes, I wish to participate in hearing session(s)

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

4. Which chapter/s of the Regulation 19 consultation would you like to comment on?

Please tick all that apply

CPRE Kent have provided detailed comments on all sections of the Local Plan as set out within our detailed comments below.

Draft Canterbury District Local Plan focused consultation

(Regulation 19) May 2026

Response from CPRE Kent

Introduction

We are CPRE Kent, the countryside charity. Founded in 1926, CPRE is one of the country's longest established and most respected environmental charities. CPRE Kent is the largest of the CPRE county branches. We represent 1,061 individual members across the county, together with 131 parish councils, including 13 within Canterbury district itself.

This response has been prepared jointly by the Kent Branch office and the Canterbury District Committee, working together with our local members to ensure it reflects an agreed position. For ease of reference, all comments are expressed simply as being from CPRE Kent throughout this response.

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside. Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

CPRE Kent's overarching concerns

CPRE Kent recognises the very substantial amount of work that has gone into this plan. Officers have taken it through repeated rounds of consultation over several years and it is clear that, in a number of important respects, the draft has improved as a result.

We welcome the deletion of the former Cooting Farm Garden Community at Adisham, previously advanced as a freestanding settlement of some 3,200 dwellings. We also strongly welcome the removal of the former Blean proposal, namely the Land north of the University of Kent allocation under previous Policy C12, which was promoted as a mixed-use freestanding settlement of around 2,000 homes. Both were unsound proposals and it is right that they have fallen away. We also strongly support a number of the positive policy interventions this Local Plan seeks to make, such as the 20% biodiversity net-gain requirement under draft policy DS25.

Most significantly, we welcome the Council's recognition within this iteration that a stepped housing trajectory is necessary, as per our comments to the September 2025 Regulation 18 consultation. This is a sensible recognition that a plan must be grounded in realistic delivery assumptions, since unduly ambitious requirements will otherwise lead to the early and inevitable failure of both the housing land supply and Housing Delivery Test terms.

Notwithstanding these positives, the plan still relies too heavily on large greenfield allocations around Canterbury and still over expands the city without any coherent overarching masterplan. In doing so, it still assumes that greenfield sites can deliver quickly, when in reality they often depend on substantial off-site infrastructure before housebuilding can begin. As has been demonstrated by the failure of the 2017 Local Plan, large green field sites might look straightforward on paper but prove slow in practice. Brownfield sites, by contrast, will often already have much of the necessary infrastructure in place, particularly transport links, and so are far better placed to support earlier delivery. It is however the brownfield sites that are not being proactively worked up as allocation on the often-mistaken belief that they will be to be complicated or not viable to deliver quickly.

In this respect, it remains our view that the plan still does not show that brownfield options have been properly exhausted ahead of yet further greenfield sites being released, or that the infrastructure needed to support these major sites will come forward in a timely and realistic manner. Accordingly, CPRE Kent does not consider the plan to be sound, positively prepared, justified, effective or fully consistent with national policy, and therefore does not consider it ready for submission in its present form.

Why CPRE Kent consider that the plan is not sound

The Plan is not justified

Under paragraph 36(b) of the NPPF, a sound plan must be justified. Specifically, the chosen strategy must be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence.

In Canterbury's case, the submission plan is not justified because it has not properly tested a brownfield led and regeneration led strategy as a reasonable alternative before resorting to substantial further greenfield release. Its brownfield first claim is not supported by the evidence. Policies C8, C33 and HB2 do not allocate sites or quantify delivery but leave the relevant opportunity areas to be worked up later through development briefs or similar documents. This is all the more regrettable and unjustifiable in the case of major sites like the Wincheap Industrial Estate, the freehold of which is held by the City Council. Work by the estates function of the Council to buy out leases or refuse renewal of them, and accordingly release land for residential construction could have begun many years ago. As far as we are aware no programme aimed at such release has yet been scheduled, let alone implemented. The Development Strategy Topic Paper indeed confirms that 16 Regeneration Opportunity Areas in Canterbury and 3 in Herne Bay still await that work. In other words, the supposed brownfield alternative has not been properly assessed before the strategic choice for further greenfield release was made.

That matters because the sustainability appraisal is clear that reasonable alternatives must be considered and that, where significant adverse effects arise, options which avoid or reduce those effects should be pursued wherever possible. It also makes the efficient use of previously developed land a core sustainability objective. Yet the preferred spatial strategy still results in substantial further greenfield release, with the Sustainability Appraisal identifying likely significant adverse effects. In those circumstances, the Council needed to test a properly worked up brownfield and regeneration led alternative before deciding on further greenfield release. It did not do so. Instead, that supposed alternative was left to be worked up later, after the strategic choice had already been made.

That same point is shown by the East Canterbury allocations. They were originally advanced on the basis of a materially different infrastructure case centred on the eastern bypass. CPRE Kent did not support that road based approach and does not suggest it should be revived. The point is that the original infrastructure case has fallen away, yet the allocations remain. What is left is a much narrower package centred on the A2 link at Bridge, Park and Bus provision and bus only connections, without convincing evidence that it can absorb the traffic generated, be funded and delivered at the right time, or form part of any coherent masterplan for Canterbury's growth. East Canterbury therefore exposes the central flaw in the strategy, namely further major greenfield release without the evidence needed to show that it is the most appropriate option.

That is why the Regeneration Opportunity Areas are such a missed opportunity. Policy C8 covers 16 city centre locations. Policy C33 covers longer term urban area regeneration. Policy HB2 does the same for Herne Bay town centre. The plan also includes a monitoring indicator for the production of development briefs or SPDs for C8, C18, W2 and HB2. In other words, the Council itself recognises that this further work is needed. In CPRE Kent's view, it needed to happen earlier and it now needs to be accelerated.

The Council should now accelerate the production of the relevant development briefs, SPDs or equivalent evidence for the Regeneration Opportunity Areas and other key brownfield locations, so that these can be examined as part of the Local Plan evidence base. That work should then inform proposed modifications to the plan. With a more realistic early years requirement, and with review already built in within five years, it would be entirely reasonable for the Council to modify the strategy further and remove some greenfield allocations if the brownfield evidence shows they are not needed to support a sound and deliverable plan.

The Plan is not effective

This is probably the plan's most serious weakness. Paragraph 36(c) of the NPPF requires genuine deliverability over the plan period for a plan to be effective. A sound strategy must therefore be realistic about what can actually be built in the early years, not just what might be achieved in theory over the longer term. In that respect, the Council is right to adopt a stepped trajectory, and CPRE Kent welcomes that.

However, in our view, even the stepped approach remains too optimistic. It does not reflect current market conditions, with major housebuilders now pulling back on land buying and warning of reduced output for the foreseeable. Nor does it reflect the clearest lesson of the 2017 Local Plan, particularly at South Canterbury, where Mountfield Park has shown that large and complex greenfield allocations do not deliver quickly when they depend on substantial infrastructure and enabling works. The plan also needs to better reflect Canterbury's real constraints, including unresolved foul water and nutrient issues and the fact that Broad Oak is not expected to provide headroom for fresh water supply until 2035 at the earliest.

The proposed reliance on the East Canterbury Strategic Development Area only reinforces that concern. This is not a single strategic site but a collection of separate landholdings and allocations which the plan assumes will come forward collaboratively, and alongside South Canterbury, to mitigate impacts and help fund and deliver key infrastructure, including a new Park and Bus facility and new wastewater provision. That is a complicated and time consuming proposition from the outset. It is as likely to delay South Canterbury further as it is to unlock East Canterbury, given the negotiations and coordination required between the various parties behind the scenes. Our experience elsewhere, including at Chilmington Green in Ashford and Whitfield in Dover, is that large multi landowner schemes of this kind do not deliver at the pace claimed on paper and often stall altogether, if they ever get started. We do not believe the main site, C15 Land south of Littlebourne Road, will have delivered 50 homes within five years as the current trajectory assumes.

The current proposed trajectory is, in our view, wholly unrealistic and will not withstand scrutiny at examination. It is simply not credible to suggest that a delivery rate of 2,228 dwellings per annum could be achieved within less than five years of the likely adoption of this plan when the recent delivery rate identified in the Meeting Development Needs Topic Paper is 761 dwellings per annum over recent years (although much lower over the longer period). That would amount to a 193 per cent increase in housebuilding in the district at precisely the point when the industry is slowing output. Delivery on that scale has not previously been seen in Kent, not even in Medway, which is a much larger authority with substantial urban areas. A reality check is therefore urgently needed.

In our view, this should be addressed now through modification, not left to be exposed at examination or used as a basis for forcing unsound sites such as Blean back into the plan. The Council has not yet given sufficient effect to paragraph 72 of the NPPF, which distinguishes between specific deliverable sites for the first five years and later specific developable sites or broad locations for growth. East Canterbury is the clearest example of a site that should not be treated as deliverable in that context. As a minimum, it should be pushed well back in the trajectory and recast instead as a later broad location for growth, to be worked up properly through further masterplanning, infrastructure evidence and delivery work. Similar scrutiny should then be applied to any other major sites which

are plainly not capable of supporting the early years supply now proposed. The longer-term position, including whether such sites remain deliverable, can then be revisited through the mandatory five yearly review.

That in turn would allow the Council to adopt a stepped requirement which is much more realistic in the early years while still meeting the full housing requirement over the 19-year plan period. On the Council's own figures, that could mean retaining 2024/25 at 1,215 dwellings, then reducing the next five years to the 70 per cent LHN rate of 851 dwellings per annum, as tested in the Development Strategy Topic Paper¹, followed by five years at 95 per cent of LHN, which is 1,154 dwellings per annum. The remaining balance would then be spread across the final eight years of the plan period at around 1,480 to 1,481 dwellings per annum. That would offer a flatter outcome over the first half of the plan period, thus far more realistic than the current approach. It would reduce the early years requirement to a level that is genuinely deliverable, avoid an excessive step in the following five years, and still leave the Council able to meet need in full over the longer term. It would also be far more consistent with national policy, with the Council's own evidence on lead in times and infrastructure dependency, and with the basic point that a sound plan must be realistic about what can actually be delivered, and when.

Just as importantly, it would create the space needed for a proper review, informed by a credible brownfield and regeneration led strategy, rather than forcing the plan to depend now on over optimistic assumptions about the speed at which large and infrastructure dependent greenfield sites will come forward.

The Council's own committee report makes clear that this can be addressed without delaying submission. It expressly states that where Regulation 19 representations identify soundness issues requiring changes to policies or text, those changes can be captured in a schedule of proposed modifications submitted alongside the plan, with any necessary soundness modifications then subject to further public consultation during the examination. It also proposes delegated authority to make such changes so as to secure timely submission and the efficient running of the examination.

The proper course is therefore to amend the trajectory and supporting topic papers now, submit the plan with those proposed modifications, and allow those changes to be tested through the examination process, rather than treating the current draft as incapable of meaningful amendment simply because of the timetable.

The Plan is not consistent with national policy.

CPRE Kent is concerned that the plan is not yet fully consistent with national policy in its treatment of the Canterbury World Heritage Site and the wider rural setting of Canterbury Cathedral. NPPF paragraph 202 identifies World Heritage Sites as heritage assets of the highest significance, internationally recognised for their Outstanding Universal Value, and confirms that such assets are irreplaceable and should be conserved in a manner appropriate to their significance. Paragraph 203 requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment, paragraph 205 requires up to date evidence on the significance of heritage assets and the contribution they make to their environment, paragraph 208 requires the effect of development within the setting of heritage assets to be properly identified and assessed, and paragraph 219 requires opportunities to enhance or better reveal the significance of heritage assets, including World Heritage Sites, to be taken. This is also consistent with the UNESCO Historic Urban Landscape approach, which supports a more holistic understanding of historic cities, recognising that heritage significance is shaped not only by individual buildings or designated boundaries, but also by wider landscape setting, views, historic layers and the relationship between urban form

¹ See para 2.38

and its surrounding environment. In CPRE Kent's view, the plan does not yet do this sufficiently for the Cathedral's long distance relationship with the surrounding countryside.

The issue is not limited to views within the formal World Heritage Site buffer zone. Canterbury Cathedral is also experienced through rural approaches to the city and through surviving views in which the Cathedral rises above the city within a wider landscape setting. Policy DS30 should therefore be strengthened, and the major Canterbury edge allocations, particularly C10 Merton Park and C15 to C17 East Canterbury, should be supported by specific heritage and townscape evidence assessing long distance views, skyline effects, cumulative harm and the erosion of rural foregrounds. The Local Plan policies map should identify and protect key views to and from the Cathedral, including surviving visual connections between the Cathedral and the surrounding countryside, so that development does not further erode views which contribute to the significance and Outstanding Universal Value of the World Heritage Site.

CPRE Kent's detailed comments on newly-proposed allocations and policies

Having set out its overarching concerns above, CPRE Kent now applies the soundness tests to the individual policies and allocations. The comments which follow should be read in conjunction with the overarching representations and not as separate or self-contained points. They are intended to show, in more detail, how the wider soundness concerns identified above arise in relation to particular policies, site allocations and elements of the proposed strategy.

Chapter 1: Spatial strategy

Vision for the district	CPRE Kents Comments
Do you consider that the vision for the district is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the vision sound. If you consider the vision to be sound, please use this box to set out your comments.	CPRE Kent does not consider the wording of the district vision to raise a soundness objection in itself. We are, however, concerned that by placing the economic strand first, the vision risks giving the impression that economic growth is the plan's primary purpose, rather than one part of a genuinely balanced strategy which must give equal weight to the district's countryside, landscapes, historic environment, climate resilience and the wellbeing of its communities. The vision would be stronger if it more clearly presented environmental protection and enhancement as the foundation for sustainable growth, rather than as a parallel benefit to be secured after growth has been planned for.
Strategic objectives for the district	CPRE Kents Comments
Do you consider that strategic objectives for the district are sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below.
Please give precise details in the box below, including any changes you would suggest to make the strategic objectives sound. If you	As with the district vision, CPRE Kent does not consider the strategic objectives to be unsound in principle, but considers that some wording would benefit from clarification so that growth is clearly framed within,

consider the strategic objectives to be sound, please use this box to set out your comments.	and not elevated above, the plan's wider environmental, landscape and community objectives. For example, CPRE Kent does not object to the plan supporting the district's universities and colleges as important educational institutions and centres of learning, skills and innovation. However, the present wording risks being read too broadly as support for institutional expansion in itself, and could be relied upon to argue for the reintroduction of unsustainable greenfield growth around the University of Kent, including the former C12 proposal. The objective should therefore be modified so that support is clearly directed towards the universities' role as genuinely sustainable educational institutions, within a strategy that protects the countryside and remains consistent with the spatial strategy of the plan. Suggested modification: "Support the sustainable development and long-term resilience of the district's universities and colleges as centres of education, learning, skills and innovation, where this is consistent with the spatial strategy, protects the countryside and avoids unnecessary greenfield expansion."
Policy SS1: Environmental Strategy for the district	CPRE Kents Comments
Do you consider that Policy SS1: Environmental Strategy for the district is sound? Please indicate your view on each of the following soundness tests:	Yes – though see our comments below.
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent strongly welcomes the fact that the first strategic policy in the plan is the Environmental Strategy for the district, and we strongly support the aspiration for qualifying major development to deliver a minimum 20% biodiversity net gain. This sets an important and positive tone, recognising that the district's habitats, landscapes, biodiversity, green and blue infrastructure, heritage assets and water environment must sit at the heart of the plan. However, our concern remains that the wider spatial strategy, with its continued reliance on major greenfield allocations, will inevitably undermine many of these aspirations by placing avoidable pressure on countryside, farmland, habitats, landscape character and the very green infrastructure the policy seeks to protect and enhance. Our remaining detailed concern relates to the proposed 20% tree cover requirement for developments over 300 homes. Whilst CPRE Kent strongly supports the ambition, it remains unclear how the 300 home threshold has been arrived at, and we would welcome clarification or a lower threshold where appropriate. The policy should also recognise that, in some circumstances, off site planting may be necessary where this would better secure meaningful tree cover while maintaining appropriate densities and good design on site.
Policy SS2: Sustainable Design Strategy for the district	CPRE Kents Comments

Do you consider that Policy SS2: Sustainable Design Strategy for the district is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. set out your comments.	CPRE Kent strongly supports the ambition of Policy SS2 and particularly its emphasis on net zero carbon ready development, high quality design, compact and connected neighbourhoods, early provision of community facilities and meaningful community engagement. Our concern, however, is again one of delivery in practice, since these aspirations will be difficult to realise if the plan continues to rely heavily on large greenfield allocations whose location and infrastructure requirements risk embedding car dependency from the outset. We also continue to question the thresholds in paragraph 8, and consider that masterplanning, design coding and community engagement should be required wherever the scale, sensitivity or cumulative impact of a proposal justifies it, rather than only where a numerical threshold is met
Policy SS3: Development Strategy for the district	CPRE Kents Comments
Do you consider that Policy SS3: Development Strategy for the district is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent does not consider Policy SS3 to be sound. We recognise that the Council is being placed in an extremely difficult position by the current standard method, which produces a housing number for Canterbury that is far above historic rates of delivery and which inevitably places very substantial pressure on greenfield land. CPRE Kent will continue to campaign at the highest levels for a planning system which produces housing numbers that meet genuine local need, particularly for genuinely affordable homes, without forcing districts such as Canterbury into unsustainable urban sprawl. However, the role of this examination is to test whether this plan, as drafted, is positively prepared, justified, effective and consistent with national policy. In our view, Policy SS3 fails those tests. We have read and understood the Sustainability Appraisal and recognise the steps that have been taken through successive iterations of the plan. We also accept, in broad terms, that an urban focused strategy, with Canterbury, Whitstable and Herne Bay as the principal focus for growth, is a logical starting point for the district. The problem is that the scale and timing of growth now being pursued, particularly in the early and middle years of the plan, means that the strategy has been stretched beyond what can realistically be delivered in a sustainable way. In practice, the claimed brownfield first approach has not been properly followed through before further greenfield release has been accepted as necessary. Policy SS3 states that previously developed land will be prioritised for development, but this is not yet matched by a sufficiently clear or

	quantified brownfield strategy. The key regeneration opportunity areas in Canterbury and Herne Bay are still largely left to future development briefs or similar work, rather than being properly assessed, masterplanned and counted as part of the plan's core housing strategy now. That is a fundamental soundness issue. If the Council wishes to rely on the wording of Policy SS3 as evidence of a brownfield first approach, it must first show what that approach is expected to deliver, when it will deliver, and how that has affected the decision to release further greenfield land. This is why CPRE Kent does not consider the policy to be justified. A sound strategy must be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence. The reasonable alternative that has not been properly tested is a more genuinely brownfield led and regeneration led strategy, supported by a more realistic stepped trajectory. Without that work, the plan moves too quickly from acknowledging that previously developed land should be prioritised to concluding that further development on agricultural land is necessary. That is not enough, particularly in a district with the environmental, landscape, heritage, water and transport constraints that Canterbury faces. Nor do we consider Policy SS3 to be effective. CPRE Kent welcomes the Council's acceptance in principle that a stepped housing trajectory is necessary. That is a clear improvement from earlier versions of the plan and reflects the point we made at Regulation 18. However, the proposed steps still remain too optimistic. Policy SS3 requires 972 dwellings per annum between 2025/26 and 2031/32 and then 1,370 dwellings per annum between 2032/33 and 2041/42, against a total requirement of 23,085 dwellings over the plan period. The Council's own evidence recognises that this is a 52 per cent increase on the adopted Local Plan housing target and that a stepped trajectory is needed because the higher requirement is challenging to meet swiftly. The problem is that the stepped trajectory has not gone far enough. Canterbury's recent experience under the 2017 Local Plan shows that large and infrastructure dependent greenfield allocations do not deliver quickly simply because they are allocated. Mountfield Park is the clearest example, but the same lesson can be seen across other major allocated sites where transport, wastewater, utilities, viability, land assembly and delivery constraints have slowed delivery in practice. Policy SS3 risks repeating the same mistake by assuming that further major greenfield allocations can make a meaningful contribution at the pace required, when the evidence and experience point the other way. This concern is particularly acute in relation to East Canterbury. Policy SS3 identifies Canterbury as the principal focus for development and allocates Strategic Development Areas at South West Canterbury and East Canterbury. Yet East Canterbury is not a single simple allocation ready to deliver. It is a complicated collection of landholdings and infrastructure
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	dependencies which requires coordination with South Canterbury, transport interventions, wastewater provision and wider masterplanning. In CPRE Kent's view, it should not be treated as a deliverable early or middle year component of the strategy. At most, it should be treated as a later broad location for growth, subject to further masterplanning, infrastructure evidence and delivery work. The policy is also not consistent with the national policy requirement that plans should be realistic about delivery and should distinguish between deliverable sites in the first five years and developable sites or broader locations for later growth. The Council's own evidence accepts that large sites have long lead in times and that the timing of delivery is the reason a stepped trajectory is necessary. The logical response is not to continue relying on optimistic assumptions about large greenfield sites, but to step the requirement back further in the early years, accelerate the brownfield and regeneration work, and place the most complex greenfield locations later in the plan where they can be properly tested through review. CPRE Kent therefore considers that Policy SS3 should be modified. The annual housing requirement should be amended to provide a more realistic early year trajectory, based on the Council's own tested 70 per cent LHN scenario for the first five years after adoption, followed by a more measured increase before the remaining need is met in the later years of the nineteen year plan period. At the same time, the policy should include a stronger and more measurable brownfield first requirement, including a commitment to quantify the capacity of the regeneration opportunity areas before further greenfield release is treated as necessary. This would not prevent the Council from planning positively. It would make the plan more realistic, more defensible and more likely to remain plan led. We also remain concerned by the settlement hierarchy embedded within Policy SS3. If Rural Service Centres and Local Service Centres are to accommodate growth, then access to a regular and conveniently located bus service should be treated as a basic prerequisite, not an optional benefit. Villages without such provision should not be relied upon to deliver supposedly sustainable growth. Without that correction, the policy risks dispersing development to locations where day to day travel will remain heavily car dependent, contrary to the plan's wider objectives on climate, transport, air quality and healthy communities. For these reasons, CPRE Kent objects to Policy SS3 as drafted. The policy should be modified so that it gives real effect to brownfield first, adopts a genuinely deliverable stepped trajectory, places complex infrastructure dependent greenfield locations later in the plan, and ensures that any growth in rural settlements is genuinely supported by sustainable transport and local services. Without those changes, Policy SS3 is not justified, not effective and not consistent with national policy.
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Do you consider that the policy is legally compliant?	No
Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent also has a concern as to legal compliance, insofar as the Sustainability Appraisal does not appear to have fully identified, described and evaluated a reasonable brownfield led and regeneration led alternative, supported by a more realistic stepped trajectory, before concluding that the greenfield release proposed through Policy SS3 is necessary. We recognise that Sustainability Appraisal work has been undertaken, but the legal requirement is not simply to appraise the preferred strategy once selected; it is to ensure that reasonable alternatives are properly tested and that the reasons for selecting the preferred option are clear. Given the scale of adverse environmental effects associated with the strategy, and the fact that key regeneration opportunity areas remain to be worked up later, CPRE Kent is concerned that this has not yet been adequately discharged.
Policy SS4: Economic Strategy for the district	CPRE Kents Comments
Do you consider that Policy SS4: Economic Strategy for the district is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent objects to Policy SS4 as drafted as it is not justified, not effective and, in respect of R21, not consistent with national policy. We remain of the view that the plan significantly over allocates employment floorspace, a concern we raised at Regulation 18 and which has still not been properly addressed. The March 2025 Economic Development Needs Study identifies a gross labour demand requirement of 123,705 sqm, but this sits against much lower figures of 61,370 sqm under the 2014 SNPP labour supply scenario and 68,240 sqm under the past take up scenario. The Council has continued with the higher demand led figure without, in our view, properly justifying why the lower and more locally grounded scenarios have been rejected, or why existing, vacant, underused or previously developed employment land cannot be used more effectively first. This concern is most acute in relation to R21, Land at Canterbury Business Park. CPRE Kent continues to consider this allocation unsound and contrary to national policy because it has not been shown to meet the test for major development within the Kent Downs National Landscape. The Council's statement that it has been unable to identify a suitable alternative location outside the National Landscape is not the same as demonstrating that all reasonable alternatives have been properly considered. Those alternatives must include the reuse, intensification or repurposing of existing employment buildings and sites, as well as the changed position arising from Chapel Down confirming it no longer requires the proposed standalone winery at Canterbury. Until those changed circumstances have been properly assessed, R21 is not justified, not effective and not consistent with national policy.

	More generally, CPRE Kent acknowledges that the Council has now produced town centre strategies for Canterbury, Whitstable and Herne Bay. However, these are high level strategy documents which provide very high-level long-term vision and strategic principles, rather than detailed, costed or deliverable projects at this stage. It also confirms that a project directory and 18-month action plan are still to follow. In our view, this means the strategies remain useful guiding documents, but they do not yet amount to genuine development or regeneration strategies capable of demonstrating what brownfield capacity can be delivered, when, and at what density. That remains a missed opportunity and goes directly to whether Policy SS4 is justified and effective, because the plan still relies on further greenfield employment allocations before the town centre regeneration potential has been properly translated into a deliverable strategy. As a final point, CPRE Kent are concerned that Policy SS4 is seemingly supporting the development of data centres, particularly when viewed in the context of the Modern Economy Needs Study produced as part of the evidence base. Data centres are highly resource intensive uses. They require substantial electricity and cooling, and can also place pressure on water supply. They also generate relatively few direct jobs when set against the amount of land and infrastructure they need. In a water stressed area, where South East Water has already identified serious constraints on accommodating residential growth and where the plan itself is relying on Broad Oak for future water supplies, it is totally unrealistic for the Local Plan to support data centres in principle without a specific requirement for need, locational suitability, grid capacity, water capacity, transport impacts and environmental acceptability to be demonstrated in advance.
Do you consider that the policy is legally compliant?	No
Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent is also concerned that Policy SS4, insofar as it supports the R21 allocation within the Kent Downs National Landscape, may not be legally compliant with the Council's enhanced duty under section 85 of the Countryside and Rights of Way Act 2000 to seek to further the purpose of conserving and enhancing natural beauty. On the evidence currently before us, it has not been demonstrated that the allocation would further that statutory purpose, particularly where reasonable alternatives outside the National Landscape, including the reuse or intensification of existing employment sites, do not appear to have been fully assessed.
Policy SS5: Movement and Transportation Strategy for the district	CPRE Kents Comments
Do you consider that Policy SS5: Movement and Transportation Strategy for the district is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent welcomes the ambition behind the Movement and Transportation Strategy, particularly its focus on public transport, walking and cycling, and the recognition within the Transport Strategy that there is very limited scope to provide additional road capacity around Canterbury. The move towards a vision and validate approach is also supported in principle, as is the aim that by 2042 more journeys in the district should be made by sustainable transport than by private car. As set out within the recent CPRE Report “Every village, every hour” Bus services are essential for allowing us to decarbonise the transport sector by providing an alternative to private car travel. This report called upon government to recognise a universal basic right to public transport and back it with statutory duties for local transport authorities to provide legal minimum service frequency standards to villages and towns. We therefore see the proposed strategy, and the enabling policy text of Policy SS4 as being a step in the right direction in achieving this goal. Our concern is one of effectiveness. The Local Plan is placing considerable weight on a substantial mode shift to absorb the transport impacts of planned growth, with the Transport Strategy envisaging a 20 per cent switch across the district to sustainable transport by 2042, while accepting that only a 3 to 5 per cent shift is likely within the first five years. That is a significant assumption, particularly where major greenfield allocations are being relied upon and where many of the more ambitious bus, active travel, parking and demand management measures are not expected until later in the plan period. CPRE Kent is also concerned that the strategy places too much weight on the expansion of Park and Ride and the creation of new Park and Bus facilities. Such facilities may have a role in intercepting existing car journeys before they enter the historic core, but they are not a substitute for a genuinely sustainable transport strategy and should not be used to justify car dependent growth at the edge of the city. A more effective approach would place greater emphasis on frequent and reliable bus services, bus priority, bus gates, improved rail services, safe walking and cycling routes and stronger demand management measures, so that the need to travel by car is reduced rather than simply displaced to new out of town car parks. For Policy SS6 to be effective, there needs to be much greater certainty that the necessary sustainable transport measures will be funded, delivered and operational in step with occupation, with clear consequences if the required mode shift is not achieved. CPRE Kent’s view remains that the most reliable way to secure genuine modal shift is to locate more homes in places where walking, cycling and public transport are already realistic choices. That means maximising brownfield regeneration opportunities in Canterbury, Whitstable and Herne Bay town centres before relying on less accessible greenfield growth.
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Policy SS6: Infrastructure Strategy for the district	CPRE Kents Comments
Do you consider that Policy SS6: Infrastructure Strategy for the district is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 31.	CPRE Kent remains concerned that that Policy SS6 is not yet effective for the purposes of the soundness test, because too much of the Local Plan's delivery depends on infrastructure which is either not yet funded, not yet consented, not yet programmed with sufficient certainty, or is placed in the medium to long term despite being critical to the strategy. The IDP itself describes the position as a living document and accepts that costs, funding sources, timescales and risks will need to continue to be updated. That may be appropriate for monitoring, but it is not enough where the soundness of the spatial strategy depends on that infrastructure being delivered in step with growth. This concern is particularly acute in relation to transport, wastewater and water supply. The IDP confirms that many of the 2017 Local Plan infrastructure schemes have still not been built out and are simply carried forward. It also confirms that the Transport Strategy depends on a wider package of sustainable transport measures, with around £66m expected to be required from CIL across the plan period, and that strategic sites are paying less through section 106 because the wider Transport Strategy is expected to reduce the need for highway based mitigation. That places considerable weight on CIL funded, district wide interventions being delivered on time and achieving the required mode shift. The margin is also extremely tight, with the IDP identifying £98.64m of CIL funded infrastructure costs against forecast strategic CIL income of £99.4m. That leaves very little resilience if costs rise, delivery slips, CIL receipts fall, or additional mitigation is required. Water and wastewater constraints also go directly to effectiveness. The IDP identifies key wastewater treatment works for Merton Park, Land south of Littlebourne Road and Land south of Bokesbourne Lane, together with wider Southern Water upgrades, including capacity upgrades at Canterbury Sturry WWTW in the AMP9 period from 2030 to 2035. It also relies on Broad Oak Reservoir as a major element of future water supply infrastructure. CPRE Kent has responded separately to the Broad Oak Water consultation and remains unconvinced that the reservoir has yet been shown to be the right scheme in the right place. Our concerns relate in particular to abstraction from the Stour catchment, the Sarre Penn realignment, hydrogeology, water quality, ecological effects, pipeline routing and the environmental sensitivity of the site. Until the reservoir has been fully assessed, consented and shown to be genuinely deliverable, it should not be treated as a secure answer to the district's water supply constraints.

	For these reasons, CPRE Kent considers Policy SS6 to be unsound as drafted. The issue is not the ambition of the policy, which we support, but whether it is effective. At present, the plan assumes that multiple complex infrastructure systems will align in time to support a very high level of growth, despite the district's recent experience showing repeated delay in transport, wastewater, utilities and other enabling infrastructure. Policy SS6 should therefore be strengthened to include clearer infrastructure triggers, a more explicit contingency mechanism where critical infrastructure is delayed, and a requirement that development dependent on unresolved water, wastewater or transport infrastructure cannot proceed ahead of that infrastructure being secured and deliverable. Without those changes, the policy does not provide sufficient confidence that the Local Plan can be delivered in the manner assumed.
Do you consider that the policy is legally compliant?	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent also has a concern as to legal compliance insofar as Policy SS6 relies on unresolved water and wastewater infrastructure, including Broad Oak Reservoir and future wastewater treatment upgrades, to support the delivery of growth affecting the Stour catchment and Stodmarsh. Unless those measures are sufficiently certain, deliverable and properly assessed, the Council cannot safely rely on them to demonstrate that the plan will avoid adverse effects on protected habitats or comply with the wider legal duties relating to the water environment. We therefore consider that this point should be addressed before submission, or through clear main modifications, so that the legal basis for the plan's infrastructure assumptions is put beyond doubt.
Policy SS7: Local Plan Review	CPRE Kents Comments
Do you consider that Policy SS7: Local Plan Review is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent agrees that, given Local Government Reorganisation, the emerging Spatial Development Strategy process, water and wastewater uncertainty, transport delivery risks and the scale of the housing requirement, an early and robust review mechanism is essential. However, Policy SS7 cannot be used as a safety net for a strategy that is already unlikely to be deliverable. CPRE Kent's view is that the Council needs to get the housing trajectory, brownfield strategy and infrastructure assumptions right now, because otherwise it is almost inevitable that the review triggers will be met shortly after adoption. That would leave the district with the worst of both worlds, namely a plan that has released major greenfield sites but then quickly proves unable to deliver the homes, infrastructure and modal shift on which its soundness depends. Policy SS7 should therefore be strengthened, but the more fundamental point is that the plan itself must be modified now so that an early review does not become an admission that the strategy was never effective in the first place.

Chapter 2: Canterbury area

Policy C1: Canterbury City Centre Strategy	CPRE Kents Comments
Do you consider that Policy C1: Canterbury City Centre Strategy is sound? Please indicate your view on each of the following soundness tests:	No - The policy is not justified The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent broadly supports the direction of Policy C1, particularly its focus on sensitive mixed use regeneration, reuse of buildings such as the former Nason's and Debenhams sites, improved public realm, green infrastructure, heritage enhancement and better walking and cycling connections. However, Policy C1 is not yet effective if it is being relied upon as part of the plan's claimed brownfield first strategy. The Canterbury City Centre Strategy is welcome, but it remains a high level guiding document, with detailed projects, interventions and delivery work left to a future project directory and action plan, while the Local Plan identifies regeneration opportunity areas without yet translating them into quantified and deliverable capacity. Policy C1 should therefore be strengthened so that it commits the Council to preparing development briefs, delivery plans or equivalent masterplanning for the city centre opportunity areas within a clear timescale, quantifying the potential for residential, employment, cultural, community and visitor uses, including upper floor residential use and meanwhile uses for vacant buildings. This is principally a matter of justification, because the Council has not yet demonstrated that these brownfield and regeneration opportunities have been properly assessed as reasonable alternatives before further greenfield release is accepted as necessary. It is also a matter of effectiveness, because without clear delivery mechanisms, timescales and capacity assumptions, Policy C1 cannot yet be relied upon to deliver the regeneration outcomes the wider strategy assumes. Without that modification, Policy C1 is positive in tone but not yet justified or effective as part of a genuinely brownfield led strategy.
Policy C2: 43-45 St George's Place	CPRE Kents Comments
Do you consider that Policy C2: 43-45 St George's Place is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent broadly supports the allocations in Policies C2 to C7, which represent the kind of urban, previously developed or well contained sites that should be prioritised ahead of further greenfield release. We encourage the Council to be ambitious in maximising their capacity, as making better use of land within the Canterbury urban area would reduce pressure on the surrounding countryside and place new homes close to jobs, services and

	sustainable transport. That ambition must, however, be balanced with the need for sensitive design which respects Canterbury's exceptional historic character, heritage assets, townscape and setting, so that higher capacity is achieved through good place making
Policy C3: Land at Hawk's Lane	CPRE Kents Comments
Do you consider that Policy C3: Land at Hawk's Lane is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent broadly supports the allocations in Policies C2 to C7, which represent the kind of urban, previously developed or well contained sites that should be prioritised ahead of further greenfield release. We encourage the Council to be ambitious in maximising their capacity, as making better use of land within the Canterbury urban area would reduce pressure on the surrounding countryside and place new homes close to jobs, services and sustainable transport. That ambition must, however, be balanced with the need for sensitive design which respects Canterbury's exceptional historic character, heritage assets, townscape and setting, so that higher capacity is achieved through good place making
Policy C4: Millers Field Car Park	CPRE Kents Comments
Do you consider that Policy C4: Millers Field Car Park is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent broadly supports the allocations in Policies C2 to C7, which represent the kind of urban, previously developed or well contained sites that should be prioritised ahead of further greenfield release. We encourage the Council to be ambitious in maximising their capacity, as making better use of land within the Canterbury urban area would reduce pressure on the surrounding countryside and place new homes close to jobs, services and sustainable transport. That ambition must, however, be balanced with the need for sensitive design which respects Canterbury's exceptional historic character, heritage assets, townscape and setting, so that higher capacity is achieved through good place making
Policy C5: Land north of Canterbury West Station	CPRE Kents Comments
Do you consider that Policy C5: Land north of Canterbury West Station is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you	CPRE Kent broadly supports the allocations in Policies C2 to C7, which represent the kind of urban, previously developed or well contained sites that should be prioritised ahead of further greenfield release. We encourage the Council to be ambitious in

consider the policy to be sound, please use this box to set out your comments.	maximising their capacity, as making better use of land within the Canterbury urban area would reduce pressure on the surrounding countryside and place new homes close to jobs, services and sustainable transport. That ambition must, however, be balanced with the need for sensitive design which respects Canterbury's exceptional historic character, heritage assets, townscape and setting, so that higher capacity is achieved through good place making
Policy C6: Land at Station Road East	CPRE Kents Comments
Do you consider that Policy C6: Land at Station Road East is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent broadly supports the allocations in Policies C2 to C7, which represent the kind of urban, previously developed or well contained sites that should be prioritised ahead of further greenfield release. We encourage the Council to be ambitious in maximising their capacity, as making better use of land within the Canterbury urban area would reduce pressure on the surrounding countryside and place new homes close to jobs, services and sustainable transport. That ambition must, however, be balanced with the need for sensitive design which respects Canterbury's exceptional historic character, heritage assets, townscape and setting, so that higher capacity is achieved through good place making
Policy C7: Becket House	CPRE Kents Comments
Do you consider that Policy C7: Becket House is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent broadly supports the allocations in Policies C2 to C7, which represent the kind of urban, previously developed or well contained sites that should be prioritised ahead of further greenfield release. We encourage the Council to be ambitious in maximising their capacity, as making better use of land within the Canterbury urban area would reduce pressure on the surrounding countryside and place new homes close to jobs, services and sustainable transport. That ambition must, however, be balanced with the need for sensitive design which respects Canterbury's exceptional historic character, heritage assets, townscape and setting, so that higher capacity is achieved through good place making.
Policy C8: Canterbury City Centre Regeneration Opportunity Areas	CPRE Kents Comments
Do you consider that Policy C8: Canterbury City Centre Regeneration Opportunity Areas is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy C8 and strongly welcomes the identification of 16 regeneration opportunity areas within Canterbury city centre. However, this policy also demonstrates the central weakness in the plan's claimed brownfield first approach. These sites are exactly the sort of locations that should have been properly assessed, masterplanned and quantified before further greenfield release was accepted as necessary. Instead, Policy C8 leaves the detailed work to future development briefs, SPDs or equivalent documents, meaning the plan does not yet show what these opportunity areas can realistically deliver, when they can deliver it, or how they could reduce the need for less sustainable greenfield allocations. This is principally a matter of justification, because the Council has not properly assessed these regeneration opportunities as part of the reasonable alternatives to greenfield release. It is also a matter of effectiveness, because without clear capacity assumptions, delivery mechanisms and timescales, Policy C8 cannot yet be relied upon to deliver the regeneration outcomes the wider strategy assumes. The Council should therefore accelerate the preparation of the relevant development briefs or equivalent evidence now, so that the results can inform proposed modifications to the plan, including the removal or reduction of greenfield allocations if the brownfield evidence shows they are not needed to support a sound and deliverable strategy.
Policy C9: Canterbury Urban Area	CPRE Kents Comments
Do you consider that Policy C9: Canterbury Urban Area is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent broadly supports the principle of Policy C9, particularly the support for regeneration within the Canterbury urban area and the recognition that Wincheap should come forward as a mixed use regeneration location. We are however slightly concerned that Policy C9 assumes that the Canterbury District Transport Strategy will deliver a significant reduction in short trips made by private car. Also, and as with Policy C8, we remain concerned regeneration potential, including Wincheap, is to be worked up later rather than quantified now.
Policy C10: Land at Merton Park	CPRE Kents Comments
Do you consider that Policy C10: Land at Merton Park is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent continues to object to Policy C10, Land at Merton Park, as currently phased. Whilst we recognise that the Regulation 19 policy now contains more detail, that additional detail does not overcome our fundamental concern that this remains a very large, complex and infrastructure dependent greenfield allocation, reliant on substantial transport, wastewater, utilities and community infrastructure being funded, coordinated and delivered at the right time. For that reason, CPRE Kent does not consider Policy C10 to be effective. It repeats the central weakness of the 2017 Local Plan by assuming that a major greenfield allocation around Canterbury can deliver at pace despite being dependent on substantial enabling works, wider modal shift, wastewater provision and other infrastructure. The Council's trajectory assumes Merton Park begins delivering in 2031/32 and then becomes a significant middle year contributor. In our view that is too optimistic. The experience of South Canterbury and Mountfield Park shows that large infrastructure dependent greenfield sites often move much more slowly than assumed, particularly where delivery depends on major infrastructure, landowner coordination, market absorption and unresolved environmental constraints. Nor do we consider the allocation to be justified at this stage. The site remains a substantial greenfield release with significant constraints, including landscape sensitivity, heritage impacts, public rights of way, minerals safeguarding, groundwater sensitivity and contamination risks associated with historic extraction and landfill. Most importantly, it would also involve the loss of high grade Best and Most Versatile agricultural land, including Grade 1 and Grade 2 land, which is a serious and irreversible harm. Historic England has previously raised concerns about the effect of development on the setting of the World Heritage Site, including long distance views of Canterbury Cathedral, while the site also lies almost entirely within the Canterbury Area of High Landscape Value and adjacent to deciduous woodland priority habitat. The plan has not demonstrated that these harms are outweighed by a properly tested need to rely on this site as a major middle year delivery site, particularly where the Council has still not properly quantified or accelerated brownfield and regeneration alternatives within Canterbury. At the very least, Policy C10 should be pushed substantially later in the trajectory and should not be relied upon as a major source of delivery unless and until the necessary infrastructure, wastewater, water, heritage, landscape, agricultural land, minerals and contamination matters have been resolved. Without that modification, Policy C10 is not justified and not effective.
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Policy C11: Land at Langton Lane	CPRE Kents Comments
Do you consider that Policy C11: Land at Langton Lane is sound? Please indicate your view on each of the following soundness tests:	N/a – see below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 43. Do you consider that the policy is legally compliant? Yes No 44. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent raises a concern with Policy C11, as its delivery appears closely linked to unresolved infrastructure and masterplanning issues affecting Merton Park and the carried forward CF1 Site 10 at Ridlands Farm, and should therefore only be relied upon where that wider South West Canterbury framework is shown to be coordinated, justified and deliverable.
Policy C12: Nackington Police Station	CPRE Kents Comments
Do you consider that Policy C12: Nackington Police Station is sound? Please indicate your view on each of the following soundness tests:	N/a – see below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 47. Do you consider that the policy is legally compliant? Yes No 48. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent broadly supports the principle of Policy C12, recognising that Nackington Police Station is a brownfield opportunity which should be prioritised ahead of further greenfield release, but we nevertheless flag a concern that its delivery and access arrangements appear closely linked to the wider South West Canterbury framework, including Merton Park and CF1 Site 10 at Ridlands Farm, and should therefore only be relied upon where that wider infrastructure and movement strategy is shown to be coordinated, justified and deliverable
Policy C13: Land to North of Cockerling Road	CPRE Kents Comments
Do you consider that Policy C13: Land to North of Cockerling Road is sound? Please indicate your view on each of the following soundness tests:	No
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	No comment – we note this site has the benefit of a planning permission/is within the footprint of an existing allocation.
Policy C14: Milton Manor House	CPRE Kents Comments

Do you consider that Policy C14: Milton Manor House is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 55. Do you consider that the policy is legally compliant? Yes No 56. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent maintains its concern with Policy C14, Milton Manor House. While the Regulation 19 wording now includes a fuller set of safeguards, those safeguards also underline how constrained the site is. The policy itself requires coordination with Cockering Farm, screening to avoid visual prominence in the open valley landscape, mitigation of A28 noise, archaeological assessment, a minerals assessment, retention and enhancement of priority habitat, ecological connectivity with Larkey Valley Wood SSSI and the Great Stour Local Wildlife Site, and a buffer to ancient woodland. This is therefore not a simple or unconstrained housing site. In soundness terms, CPRE Kent does not consider the allocation to be justified or effective as currently relied upon. The site remains a mixed greenfield edge of city allocation with ecological, landscape, groundwater, minerals and Best and Most Versatile agricultural land constraints, and it is also relatively weak in sustainable transport terms unless delivered as part of a wider, fully coordinated South West Canterbury framework. The housing trajectory appears to rely on delivery from C14 from around 2030/31 to 2034/35, which is precisely when the plan is already placing considerable pressure on infrastructure dependent greenfield supply. At the very least, the policy should make clear that C14 must not come forward in isolation and should only be relied upon where its access, active travel, ecological, landscape and infrastructure relationship with Cockering Farm and the wider South West Canterbury area has been shown to be coordinated, justified and deliverable.
Policy C15: Land south of Littlebourne Road	CPRE Kents Comments
Do you consider that Policy C15: Land south of Littlebourne Road is sound? Please indicate your view on each of the following soundness tests:	No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	As set out in our overarching comments, CPRE Kent does not consider the plan to represent a genuine brownfield first strategy, nor does it consider the housing trajectory to be effective in delivery terms. We do not repeat those wider objections here, but they are directly relevant to Policies C15, C16 and C17, which together form the East Canterbury Strategic Development Area. For the purposes of this policy response, we therefore focus on the specific delivery and effectiveness concerns arising from these allocations.

	CPRE Kent continues to object to Policies C15, C16 and C17. These sites were previously linked to the Eastern Movement Corridor, and when that road based strategy was removed the ability of the sites to mitigate pressure on local roads became unclear. In CPRE Kent's view, the replacement package has still not been shown to provide a justified or deliverable basis for major greenfield growth east of Canterbury. The concern is particularly acute in relation to effectiveness. The housing trajectory assumes that C15 will begin delivering 50 homes in 2031/32 and then rise quickly to 100, 120 and then 150 homes per year, with C16 also starting at 50 homes in 2031/32 and then delivering at a sustained high rate. Together, C15 and C16 are therefore being treated as a major middle year component of the housing trajectory, not as a long term reserve. That is not realistic. These are large, interdependent, infrastructure dependent greenfield sites, and the Council's own evidence shows that delivery relies on a local distributor road, a bridge over the railway, upgrades through South Canterbury, a Park and Bus facility, new schools, a health facility, wastewater treatment works, sewerage reinforcement and wider active travel and public transport measures. The phasing of that infrastructure is itself a serious concern. The Infrastructure Delivery Plan states that the C15 to C16 connection must be operational before 300 dwellings, but the bridge over the railway and the connection through South Canterbury to form part of the A257 to A2 link is only required before 1,000 dwellings across C15 and C16. That is too late for infrastructure which is integral to the claimed sustainability and accessibility of the allocation. It also introduces a significant dependency on South Canterbury, Network Rail, multiple landowners, future section 106 agreements and detailed design work, all at the point when the plan is already relying on these sites for substantial delivery. Nor do we consider the allocations to be justified. The sites represent substantial greenfield release on the edge of Canterbury, including high quality Best and Most Versatile agricultural land. They also raise significant landscape, heritage and ecological concerns, including their relationship with the Canterbury Area of High Landscape Value, the setting of nearby conservation areas and listed buildings, ancient woodland, priority habitat, the Great Crested Newt risk zone and the wider rural setting east of the city. These harms have not been shown to be outweighed by a properly tested need to release these sites now, particularly when the Council has still not properly quantified and accelerated the brownfield and regeneration opportunities within Canterbury.
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	Water and wastewater issues add further uncertainty. The Regulation 19 plan assumes that C15 and C16 will provide high quality on site regulated wastewater treatment facilities, with additional mitigation potentially required if discharge is to the Lampen Stream, which feeds into Stodmarsh. The IDP also records that sewerage network reinforcement will be needed before C15 and C16 can be fully occupied, with key elements still not costed or fully fixed. That is not a minor technical matter. It goes directly to whether the sites can be delivered at the rate and in the period now assumed. For these reasons, CPRE Kent considers Policies C15, C16 and C17 to be not justified and not effective as drafted. At the very least, the allocations should be recast as a single strategic allocation, supported by a Council led masterplan or SPD, and pushed later in the trajectory so that they are not relied upon as a major middle year source of housing supply. The policy should also require the railway bridge, A257 to A2 link, Park and Bus facility, wastewater treatment works, sewerage reinforcement, active travel links and ecological and landscape mitigation to be secured at much earlier and clearer trigger points. Without those modifications, the East Canterbury allocations remain a high risk example of exactly the sort of infrastructure dependent greenfield growth that has already caused delivery problems in Canterbury.
Policy C16: Land south of Bekesbourne Lane	CPRE Kents Comments
Do you consider that Policy C16: Land south of Bekesbourne Lane is sound? Please indicate your view on each of the following soundness tests:	No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	Please see our comments with respect to Policy C15 above.
Policy C17: Land at Seotamot	CPRE Kents Comments
Do you consider that Policy C17: Land at Seotamot is sound? Please indicate your view on each of the following soundness tests:	No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
	Please see our comments with respect to Policy C15 above.
Policy C18: Wincheap Commercial Area	CPRE Kents Comments
Do you consider that Policy C18: Wincheap Commercial Area is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	Policy C18 is strongly supported in principle. Wincheap is exactly the kind of brownfield, urban and accessible location that should be central to a genuinely brownfield first strategy, particularly given its proximity to Canterbury East station, the city centre, existing services and employment. CPRE Kent does not say that the figure of approximately 1,000 dwellings is necessarily too low, because this is properly a mixed use regeneration area and its final capacity will need to reflect employment, community, open space, movement, heritage, air quality and flood risk considerations. However, the direction of travel in national policy is clearly towards making more efficient use of well connected urban land, including around railway stations, with the current NPPF reform consultation proposing minimum densities of 40 dwellings per hectare around all stations and 50 dwellings per hectare around well connected stations. In that context, the Council needs to show that Wincheap has been tested ambitiously and that approximately 1,000 dwellings is the right figure once the wider mix of uses has been properly planned. At present, the necessary masterplanning and capacity testing has not yet been done, so the plan does not currently show whether 1,000 dwellings is the optimum capacity, a cautious assumption, or the appropriate outcome of a properly tested mixed use strategy. This illustrates the wider weakness identified in our overarching comments. If a genuine brownfield first strategy had been pursued from the outset, Wincheap would already have been subject to detailed capacity testing, land assembly work, viability assessment and Council led masterplanning before further greenfield release was accepted as necessary. We recognise that Wincheap is not a simple site. It has existing commercial uses, multiple ownership and leasehold interests, air quality issues, heritage sensitivity along Wincheap Road, including listed buildings, and wider design and infrastructure constraints. Those are precisely the reasons why the work needed to be done earlier, not reasons to leave the site as a broad location to be worked up later. Policy C18 should therefore be strengthened so that it commits the Council to preparing a development brief, Council led masterplan, design code or Supplementary Plan, rather than relying only on an SPD mechanism. This wording is also needed because national plan making reforms mean that new SPDs are being phased out, with supplementary plans and other plan led documents becoming the more appropriate mechanism for detailed policy and site guidance. That document should test the most appropriate mix of uses and the maximum suitable residential capacity of the site, having regard to the need to make efficient use of this highly accessible brownfield location while respecting heritage, air quality, flood risk, active travel, open space and existing employment requirements. Without that modification, Policy C18 is positive in
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	principle, but not yet justified or effective as part of a genuine brownfield first strategy.
Policy C19: Land at Military Road	CPRE Kents Comments
Do you consider that Policy C19: Land at Military Road is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent strongly supports the principle of Policy C19, which allocates a brownfield urban site for residential development in a sustainable location within Canterbury. We welcome the proposed average net density of around 80 dwellings per hectare, which is the kind of efficient use of land that should be prioritised before further greenfield release. The final scheme should nevertheless demonstrate that approximately 180 dwellings is the optimum capacity for the site, while respecting the setting of All Saints Church, providing appropriate open space and ecological buffering to Old Park and Chequers Local Wildlife Site and Realm Wood, and securing safe walking and cycling links.
Policy C20: Land at Sussex Avenue	CPRE Kents Comments
Do you consider that Policy C20: Land at Sussex Avenue is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent strongly supports the principle of Policy C20, which allocates a small urban site at Sussex Avenue for residential development in a sustainable Canterbury location. We welcome the proposed average net density of 80 dwellings per hectare and consider this to be the right direction of travel for brownfield and urban sites. The final scheme should still demonstrate that the proposed figure of approximately 21 dwellings properly maximises the site's capacity, while protecting the amenity and privacy of existing and future residents and ensuring a high quality design response.
Policy C21: Land at Suffolk Road	CPRE Kents Comments
Do you consider that Policy C21: Land at Suffolk Road is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy C21, which makes use of a small urban site at Suffolk Road for residential development. We welcome the proposed average net density of 80 dwellings per hectare, but the final scheme should demonstrate that the proposed figure of approximately five dwellings is the optimum capacity for the site, having regard to its sensitive location within part of the St Martin's Hospital Conservation Area. Capacity should be maximised only where this can be achieved alongside retention of existing trees, appropriate open space to the west of the site and protection of the existing footpath link to public footpath CC40.

Policy C22: Land at the Former Chaucer Technology School	CPRE Kents Comments
Do you consider that Policy C22: Land at the Former Chaucer Technology School is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy C22 in principle, as the former Chaucer Technology School is a brownfield urban site in a sustainable Canterbury location, and the policy proposes flats at around 80 dwellings per hectare, which is the kind of efficient use of previously developed land that should be prioritised ahead of greenfield release. However, we recognise local concern that the site has historically served an educational and community function, and that this part of Canterbury has limited access to flat, publicly accessible open space for informal play and recreation. The policy should therefore require the final scheme to demonstrate that the site is no longer needed for education or community infrastructure, that its capacity has been sensitively maximised, and that meaningful on site open space or equivalent local open space and play improvements are secured in line with Policy DS28. It should also retain the required landscape buffer to the railway and adjoining school, protect residential amenity, and improve walking and cycling links to the city centre and local neighbourhood facilities.
Policy C23: Land south of the Spitfire Ground, St Lawrence	CPRE Kents Comments
Do you consider that Policy C23: Land south of the Spitfire Ground, St Lawrence is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy C23, insofar as it seeks to support the visitor economy through development related to The Spitfire Ground in an urban Canterbury location. As this is a mixed use allocation rather than a housing allocation, the key issue is not residential density but whether the site makes the most efficient and sensitive use of land while avoiding unnecessary pressure for development elsewhere. The final scheme should therefore demonstrate that the hotel, cricket related commercial uses and supporting facilities have been properly optimised, while respecting the setting and operation of the cricket ground, protecting neighbouring amenity, sustaining nearby heritage assets including the Old Dover Road, Oaten Hill and St Lawrence Conservation Area, retaining eastern boundary trees and minimising car reliance through a robust transport strategy
Policy C24: Land at Whitehall Close	CPRE Kents Comments
Do you consider that Policy C24: Land at Whitehall Close is sound? Please indicate your view on each of the following soundness tests:	Yes

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy C24, which allocates a small urban site at Whitehall Close for residential development within Canterbury. We welcome the proposed average net density of 80 dwellings per hectare, but the final scheme should demonstrate that approximately seven dwellings is the optimum capacity for the site. That capacity should be achieved through high quality design which responds properly to archaeological sensitivity, railway noise, flood risk where relevant and the need for a landscape buffer between development and the adjacent railway line
Policy C25: Land at St Stephen's Road	CPRE Kents Comments
Do you consider that Policy C25: Land at St Stephen's Road is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy C25, which allocates land at St Stephen's Road for residential development in an accessible Canterbury location. We welcome the proposed average net density of 80 dwellings per hectare, but the final scheme should demonstrate that approximately 18 dwellings is the optimum capacity for the site, not simply an indicative figure. That assessment should be undertaken alongside careful consideration of the retention and integration of Beverley House if feasible, the setting of the Canterbury Conservation Area, archaeological potential and the need to mitigate railway noise.
Policy C26: Land at Long Meadow Way	CPRE Kents Comments
Do you consider that Policy C26: Land at Long Meadow Way is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy C26, which allocates a small urban site at Long Meadow Way for residential development. We welcome the proposed average net density of 80 dwellings per hectare, which is consistent with the more efficient use of urban land that should be prioritised before further greenfield release. The final scheme should nevertheless demonstrate that approximately five dwellings is the optimum capacity for the site, while ensuring high quality design, appropriate open space provision and a layout that respects the character and amenity of the surrounding residential area.
Policy C27: Land at Bawden Close	CPRE Kents Comments
Do you consider that Policy C27: Land at Bawden Close is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you	CPRE Kent supports the principle of Policy C27, which allocates a small urban site at Bawden Close for residential development. We welcome the proposed average net density of 80 dwellings per hectare and consider that such small urban sites should make an

consider the policy to be sound, please use this box to set out your comments.	important cumulative contribution to a genuine brownfield first strategy. The final scheme should still demonstrate that approximately five dwellings is the optimum capacity for the site, while ensuring high quality design, appropriate open space provision and a layout that protects neighbouring amenity and local character.
Policy C28: Land at Copinger Close	CPRE Kents Comments
Do you consider that Policy C28: Land at Copinger Close is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy C28, which allocates a small urban site at Copinger Close for residential development. We welcome the proposed average net density of 80 dwellings per hectare, as this reflects the kind of efficient use of urban land that should reduce pressure on the countryside. The final scheme should demonstrate that approximately six dwellings is the optimum capacity for the site, while providing high quality design, appropriate open space and a layout that respects the surrounding residential context.
Policy C29: Land at Jesuit Close	CPRE Kents Comments
Do you consider that Policy C29: Land at Jesuit Close is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy C28, which allocates a small urban site at Copinger Close for residential development. We welcome the proposed average net density of 80 dwellings per hectare, as this reflects the kind of efficient use of urban land that should reduce pressure on the countryside. The final scheme should demonstrate that approximately six dwellings is the optimum capacity for the site, while providing high quality design, appropriate open space and a layout that respects the surrounding residential context.
Policy C30: Land at Folly Farm	CPRE Kents Comments
Do you consider that Policy C30: Land at Folly Farm is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent notes that Policy C30 allocates a greenfield site at Folly Farm, albeit one adjacent to the existing Canterbury urban area. We therefore do not place this site in the same category as the brownfield urban allocations which we support in principle. If the allocation is retained, the final scheme must be tightly contained, must not encroach into protected open space or the wider countryside, and must demonstrate that the proposed 35 dwellings is the appropriate capacity having regard to the setting of Grade II listed Folly Farm, archaeological potential, landscape

	buffers to the railway and surrounding countryside, walking and cycling links, parking impacts on Kemsing Gardens and nutrient neutrality requirements. On that basis, CPRE Kent raises concern that Policy C30 is not fully justified unless it is clearly shown to be necessary after brownfield opportunities have been maximised.
Policy C31: Land on the eastern side of Shelford Landfill	CPRE Kents Comments
Do you consider that Policy C31: Land on the eastern side of Shelford Landfill is sound? Please indicate your view on each of the following soundness tests:	N/a – see below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	the policy should remain tightly controlled so that it does not become a general employment allocation extending further into the surrounding countryside. Any scheme should demonstrate that development is confined to the least sensitive part of the site, retains existing tree cover, secures landscape and biodiversity enhancement in the Stour Valley Slopes character area, addresses archaeological potential and fully assesses contamination, groundwater, drainage, traffic and any relationship with the wider Shelford landfill and Broad Oak water environment.
Policy C32: Land at Wincheap Park and Ride	CPRE Kents Comments
Do you consider that Policy C32: Land at Wincheap Park and Ride is sound? Please indicate your view on each of the following soundness tests:	N/a – see below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 127. Do you consider that the policy is legally compliant? Yes No 128. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent notes that Policy C32 relates to a sensitive location where we have previously raised significant concerns, including in relation to the Wincheap Water Meadows and the earlier Park and Ride extension proposals. We recognise that improving Park and Ride capacity can form part of a wider strategy to reduce traffic entering Canterbury city centre, and that this option may be preferable to the earlier suggestion of using Thanington Recreation Ground. However, the site is not unconstrained and should not be treated as a routine transport allocation. It includes land close to the River Stour, with floodplain, ecological, landscape and green corridor sensitivities, alongside the need to address the relocation of existing waste operations. Policy C32 should therefore be tightly framed so that any expansion is demonstrably necessary, avoids unnecessary encroachment into the Stour Valley, protects and enhances the Local Wildlife Site, Local Nature Reserve, floodplain function and Great Stour Way, and secures appropriate alternative provision for existing waste uses before development proceeds.
Policy C33: Canterbury Urban Area Regeneration Opportunity Areas	CPRE Kents Comments
Do you consider that Policy C33: Canterbury Urban Area Regeneration Opportunity Areas is sound? Please	Yes

indicate your view on each of the following soundness tests:	
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent strongly supports the principle of Policy C33 and welcomes the identification of longer term regeneration opportunity areas within the Canterbury urban area. These are precisely the sort of locations that should sit at the heart of a genuine brownfield first strategy, making better use of previously developed and underused land, improving existing neighbourhoods and reducing pressure for further greenfield release. However, the policy also illustrates the wider missed opportunity in this plan. Had this work been prioritised earlier, with capacity, viability, delivery and infrastructure issues properly tested before the spatial strategy was fixed, it may have been possible to reduce the scale of greenfield land now proposed for allocation. The preparation of development briefs, Council led masterplans or equivalent planning documents for these areas should therefore be expedited and treated as a key early action. That said, CPRE Kent recognises that the Council is trying to move in the right direction through Policy C33, and we support that ambition.

Chapter 3: Whitstable

Policy W1: Whitstable Town Centre Strategy	CPRE Kents Comments
Do you consider that Policy W1: Whitstable Town Centre Strategy is sound? Please indicate your view on each of the following soundness tests:	N/a – see below.
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the intent of Policy W1 and welcomes the recognition that Whitstable town centre should be strengthened through sensitive regeneration, sustainable transport improvements, green infrastructure, public realm enhancement and a diverse mix of uses. However, as with Canterbury, the town centre strategy work has come too late in the Local Plan process and has not yet been translated into the quantified, deliverable regeneration programme needed to show what town centre capacity could be achieved before further greenfield release is relied up. The policy is therefore positive in direction, and CPRE Kent supports that direction, but it would be more justified and effective if the Council committed to accelerating the town centre strategy, identifying deliverable brownfield and regeneration opportunities and using that work to reduce pressure for less sustainable greenfield growth.
Policy W2: Whitstable Harbour	CPRE Kents Comments
Do you consider that Policy W2: Whitstable Harbour is sound? Please indicate your view on each of the following soundness tests:	N/a – see below.
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy W2, but the Whitstable regeneration opportunity areas again underline that the town centre strategy work has come too late to properly inform a quantified and deliverable brownfield first strategy before further greenfield release is relied upon. The policy should also be amended so that it does not rely solely on the production of an SPD, given that SPDs are being superseded, and should instead refer to a development brief, Council led masterplan, design code, Supplementary Plan or equivalent planning document.
Policy W3: Whitstable Urban Area Strategy	CPRE Kents Comments
Do you consider that Policy W3: Whitstable Urban Area Strategy is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent broadly supports the direction of Policy W3, particularly its emphasis on improving walking and cycling connectivity, strengthening links to the Crab and Winkle Way and Coast Path, protecting open space and green infrastructure, and ensuring that Whitstable's growth supports rather than undermines the vitality

11. Do you consider that the policy is legally compliant? Yes No 12. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	of the town centre. The Whitstable Town Centre Strategy rightly identifies the town's distinctive maritime character, independent high street, working harbour and creative culture as central to its future, while also recognising real pressures from traffic, poor active travel links from the station, visitor congestion and the need to balance residents' needs with tourism. However, as with Canterbury, the strategy work has come too late in the Local Plan process to properly inform a genuinely brownfield first approach. The Strategy itself notes that there is only one town centre allocation, providing seven dwellings, with the main planned growth instead taking place at Brooklands Farm on the edge of Whitstable. Policy W3 is therefore positive in direction, but it is not yet fully justified or effective unless the Council can show that town centre, harbour and other brownfield regeneration opportunities have been properly tested and maximised before relying on further greenfield growth.
Policy W4: Land at Brooklands Farm	CPRE Kents Comments
Do you consider that Policy W4: Land at Brooklands Farm is sound? Please indicate your view on each of the following soundness tests:	No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 15. Do you consider that the policy is legally compliant? Yes No 16. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent continues to object to Policy W4, Land at Brooklands Farm. As set out in our overarching comments, our concern is not simply that this is a greenfield site, but that the plan has not first demonstrated a genuine brownfield first strategy, nor shown that large infrastructure dependent greenfield allocations can be delivered at the pace now assumed. Policy W4 is a clear example of that wider soundness problem. The Regulation 19 plan allocates the site for approximately 1,400 homes as part of a much wider South Whitstable Strategic Development Area, including a local centre, business space, a primary school, a SEND school, open space, sports provision, a new A299 junction, a Park and Bus facility and enhanced walking and cycling links. That scale of provision underlines the complexity of the allocation rather than resolving our concern. In terms of effectiveness, the housing trajectory treats Brooklands Farm as a significant middle year contributor, with delivery rising to 160 dwellings per annum for several years. That is a very ambitious assumption for a large greenfield site dependent on major highways, schools, wastewater, active travel and community infrastructure. The Infrastructure Delivery Plan confirms that the new A299 junction is costed at around £20m and is identified as medium to long term, while the diversion of South Street, the mobility hub, bus facilities, station improvements, school provision, open space, sports provision and sewerage reinforcement all sit within a wider package of measures still to be delivered. If the A299 junction or other essential infrastructure is

	delayed or found not to be viable, there is a real risk that the development either stalls part way through or proceeds in a manner which places unacceptable pressure on the existing local road network. In terms of justification, our previous concerns remain. The site is not an unconstrained or ordinary urban extension. It contains and adjoins important ecological assets, including Convict Wood Local Wildlife Site, Ancient Woodland and Priority Habitat, and it lies in a landscape which contributes to the rural setting of the Blean Woods and the Chestfield farmland character area. The site also raises flood risk, surface water, agricultural land, minerals safeguarding, heritage and local infrastructure concerns. The submitted planning material for Brooklands Farm has not reassured CPRE Kent that these matters can be resolved without substantial harm. Rather, it reinforces our concern that development of this scale would fundamentally alter the rural character of the area, increase pressure on sensitive habitats and require intrusive infrastructure to make the site function. We are also concerned that the evidence does not yet adequately address the cumulative transport and safety implications of Brooklands Farm alongside the proposed secondary school at Bodkin Farm, the Park and Bus proposals, the existing pressures around Chestfield and Swalecliffe, and the wider A2990 and A290 network. Strategic modelling is not the same as demonstrating that the local impacts of this allocation, including school travel, pedestrian safety, railway station access, junction capacity and traffic displacement through sensitive lanes and towards Blean Woods, have been properly resolved. These matters go directly to whether the allocation is justified and effective. For these reasons, CPRE Kent considers Policy W4 to be not justified and not effective as drafted. The allocation should be deleted unless and until the Council can demonstrate that the site is necessary after brownfield and regeneration opportunities have been fully tested, that its ecological, landscape, flood risk, heritage and wastewater impacts can be satisfactorily addressed, and that the A299 junction and wider transport package are funded, deliverable and secured at the point they are needed. Without that certainty, Brooklands Farm remains precisely the kind of high risk, infrastructure dependent greenfield allocation that the plan should be seeking to avoid.
Policy W5: Land South of Thanet Way	CPRE Kents Comments
Do you consider that Policy W5: Land South of Thanet Way is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below.

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent maintains concerns with Policy W5, Land south of Thanet Way. We however recognise that outline planning permission has now been granted and that the policy seeks to secure a Park and Bus facility alongside approximately 220 dwellings, local facilities, open space, landscape buffers and pedestrian and cycle connections.
Policy W6: Land at Golden Hill	CPRE Kents Comments
Do you consider that Policy W6: Land at Golden Hill is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	We maintain an in principle concern about further greenfield release in this location, particularly given its cumulative relationship with W5 and the wider urbanising effect south of Thanet Way. However, we recognise that the grant of outline permission for W5 has materially changed the planning context and weakens any argument that W6 can be considered in isolation. The Council must nevertheless still demonstrate that W6 is justified on its own merits, that its delivery is genuinely dependent on and coordinated with W5, and that the landscape buffer, elevated open space, ecological assessment, archaeological assessment, noise mitigation, access via W5 and delivery of the Gypsy and Traveller pitches are all secured in a clear and enforceable way. Without those safeguards, Policy W6 risks becoming a further incremental extension of greenfield development rather than a properly planned and justified part of the Whitstable strategy.
Policy W7: Bodkin Farm	CPRE Kents Comments
Do you consider that Policy W7: Bodkin Farm is sound? Please indicate your view on each of the following soundness tests:	No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent continues to have serious concerns with Policy W7, Bodkin Farm. The Council's own evidence records that the site was assessed as unsuitable in the SLAA because of concerns regarding local highway capacity and landscape impact, and that it lies within the existing Green Gap intended to prevent coalescence between Whitstable and Herne Bay. The justification for allocation is therefore heavily dependent on the proposed school and on wider infrastructure unlocked by Brooklands Farm, rather than on the intrinsic suitability of the site itself. That makes the recent deferral of the live Bodkin Farm planning application particularly relevant. Members deferred the application in order to seek further information on wastewater capacity, the possibility of a speed limit reduction and firmer guarantees of bus provision. These matter go directly to whether

	the allocation is effective and deliverable. They also reinforce the concern that the school element is not yet secured with sufficient certainty, especially where the Development Strategy Topic Paper states only that the secondary school site is to be transferred to KCC “at an appropriate time to be agreed with KCC”, rather than requiring a clear, enforceable delivery trigger tied to occupation. Policy W7 is also dependent on the wider South Whitstable Strategic Development Area. The Development Strategy Topic Paper states that Bodkin Farm is being allocated because Brooklands Farm would deliver improved A299 connectivity, and that supporting residential development is needed to facilitate the school. The IDP identifies the 6FE secondary school at Bodkin Farm as a long-term item with a total cost of £34.4m, while the housing trajectory treats the 250 homes as deliverable from 2030/31. That creates a real risk that housing comes forward while the school remains uncertain, delayed or unfunded. For these reasons, CPRE Kent considers Policy W7 not justified or effective as drafted. If the Council is to rely on this greenfield and Green Gap site, it must demonstrate that the school is genuinely necessary, funded and deliverable, that it will be delivered at the point required, and that housing is not simply being used to justify development on a site previously found unsuitable. The policy should be modified to include firm triggers for the transfer and delivery of the school, secured bus provision, wastewater capacity, pedestrian and highway safety measures, and clear safeguards for the Green Gap, ancient woodland, landscape setting, flood risk and local road network. Without those changes, Policy W7 remains a high risk allocation whose claimed public benefit is not yet secured with the certainty required for a sound plan.
Policy W8: Land to the south west of Joseph Wilson Business Park	CPRE Kents Comments
Do you consider that Policy W8: Land to the south west of Joseph Wilson Business Park is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 31. Do you consider that the policy is legally compliant? Yes No 32. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally	No comment

compliant, please use this box to set out your comments.	
Policy W9: Land Lying to the West of Golden Hill	CPRE Kents Comments
Do you consider that Policy W9: Land Lying to the West of Golden Hill is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	No comment
Policy W10: Land at Beresford Road	CPRE Kents Comments
Do you consider that Policy W10: Land at Beresford Road is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy W10 in principle, as a brownfield urban site in a sustainable Whitstable location which should be prioritised ahead of further greenfield release. The final scheme should nevertheless demonstrate that site capacity has been properly maximised through sensitive design, while fully addressing the flood risk, drainage, access, townscape and amenity constraints identified in the policy.
Policy W11: St Vincent's Centre	CPRE Kents Comments
Do you consider that Policy W10: Land at Beresford Road is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy W11 in principle, as a brownfield urban site in a sustainable Whitstable location which should be prioritised ahead of further greenfield release. The final scheme should nevertheless demonstrate that site capacity has been properly maximised through sensitive design, while ensuring that the existing community facility is retained, re-provided or otherwise properly addressed in a way that does not undermine local community provision.
Overall chapter comments/feedback	Overall chapter comments/feedback
Do you consider that Chapter 3 is sound? Please indicate your view on each of the following soundness tests:	Yes/No The chapter is not positively prepared The chapter is not justified The chapter is not effective The chapter is not consistent with national policy

Chapter 4: Herne Bay

Policy HB1: Herne Bay Town Centre Strategy	CPRE Kents Comments
Do you consider that Policy HB1: Herne Bay Town Centre Strategy is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the direction of Policy HB1 and welcomes its focus on town centre regeneration. However, Herne Bay also exposes, more clearly than anywhere else in the plan, the long standing failure to turn regeneration ambition into a deliverable brownfield first strategy. The need has been known for decades. The 2010 Herne Bay Area Action Plan identified the town's poor image, high levels of social deprivation, weak retail, poor public realm and key regeneration sites. The new Town Centre Strategy confirms that those issues have not gone away, with Herne Bay town centre still within the 20 per cent most deprived local areas nationally and with crime and jobs deprivation in the worst 10 per cent. CPRE Kent therefore supports Policy HB1, but considers it is not yet effective unless it is tied to a clear, funded and time limited regeneration programme which quantifies brownfield and town centre capacity before further greenfield release, or the loss of valued community assets elsewhere in Herne Bay, is accepted as necessary.
Policy HB2: Herne Bay Town Centre Regeneration Opportunity Areas	CPRE Kents Comments
Do you consider that Policy HB2: Herne Bay Town Centre Regeneration Opportunity Areas is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 7. Do you consider that the policy is legally compliant? Yes No 8. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent strongly supports the principle of Policy HB2 and welcomes the identification of Herne Bay Town Centre Regeneration Opportunity Areas. These are precisely the kinds of locations that should have been at the centre of a genuine brownfield first strategy. The difficulty is that, in 2026, the policy still does not allocate sites, quantify capacity or set clear delivery requirements. It expressly says that the opportunity areas could come forward, which is positive, though the reality is the detailed work has come far too late. The 2010 Area Action Plan had already identified the Central Development Area, Beach Street and the Bus Depot as key regeneration sites, with indicative capacities and development principles. However, here we are in 2026 with no detailed plans for these sites whilst yet further greenfield land is being allocated.

	The Council should therefore expedite the development briefs, masterplans, delivery plans or supplementary plans for HB2 now, so they can inform modifications to the Local Plan and reduce reliance on less sustainable options. Without that, Policy HB2 is welcome in tone but not yet justified or effective.
Policy HB3: Herne Bay Urban Area Strategy	CPRE Kents Comments
Do you consider that Policy HB3: Herne Bay Urban Area Strategy is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	The Regulation 19 plan itself recognises that Herne Bay has already seen significant growth under the 2017 Local Plan and that more limited growth is now proposed to consolidate that position.. Policy HB3 should therefore be modified to require the Council to prioritise, programme and deliver town centre and brownfield regeneration before relying on further greenfield or community asset release. That would make the policy more justified, more effective and more consistent with the plan's stated regeneration ambitions
Policy HB4: Land at Beacon Road	CPRE Kents Comments
Do you consider that Policy HB4: Land at Beacon Road is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent strongly objects to Policy HB4, Land at Beacon Road, as it is not justified, not effective and is not consistent with the proper protection of valued open space. The Council's own Development Strategy Topic Paper confirms that the site was identified as unsuitable in the SLAA because it lies within protected Existing Open Space, and that the Regulation 19 version now reduces the proposed yield to just 20 dwellings while retaining half the site as open space. Whilst welcome, this underscores the point that whilst the housing contribution is marginal, the loss of a locally valued community and green infrastructure asset would be significant. This is especially difficult to justify in Herne Bay, where the need for regeneration, community infrastructure, open space, health and wellbeing improvements has been recognised for decades and where the new Town Centre Strategy again identifies deprivation, poor health outcomes, lack of social infrastructure and the need to bring underused spaces back into positive community use. It is also the case that residents are actively seeking community gardens, orchards, play space, allotments and biodiversity

	enhancement on this land. In CPRE Kent's view, that is a far more coherent response to the needs of this neighbourhood than releasing protected open space for only 20 homes. Policy HB4 should therefore be deleted and the site retained for community open space, biodiversity, food growing, play and wellbeing uses.
Policy HB5: Land to the West of Thornden Wood Road	CPRE Kents Comments
Do you consider that Policy HB5: Land to the West of Thornden Wood Road is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent remains concerned by Policy HB5, Land to the West of Thornden Wood Road. We recognise the public benefit of improving secondary school provision on the coast, and the Council's position that many pupils currently travel from the coastal area to Canterbury. However, this remains a greenfield site in the existing Green Gap, and the allocation is only capable of being justified if the school is genuinely necessary, funded, deliverable and secured at the point it is needed. That is particularly important given the separate proposed secondary school at Bodkin Farm, also serving the coastal secondary education need, which raises an obvious question as to whether both schools are genuinely required, deliverable and likely to be built within the plan period. The Infrastructure Delivery Plan identifies the HB5 school as a long term or beyond plan period scheme, with costs and funding still uncertain, while the housing trajectory assumes 150 homes from 2031/32 to 2034/35. In soundness terms, Policy HB5 is not yet effective unless the Council can demonstrate why both coastal secondary schools are needed, how HB5 will be funded and delivered, and what firm trigger will prevent the housing coming forward while the principal public benefit relied upon to justify the allocation remains uncertain.
Policy HB6: Land comprising Nursery Industrial Units and former Kent Ambulance Station	CPRE Kents Comments
Do you consider that Policy HB6: Land comprising Nursery Industrial Units and former Kent Ambulance Station is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy HB6 in principle, as the former ambulance station is a genuine brownfield site in a sustainable Herne Bay location, and such sites should be prioritised and their capacity sensitively maximised before any further greenfield or protected open space release is relied upon.
Policy HB7: Former Herne Bay Driving Range	CPRE Kents Comments

Do you consider that Policy HB7: Former Herne Bay Driving Range is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy HB7 in principle, as the SLAA identifies the former Herne Bay Golf Course Driving Range as brownfield land and the allocation would make a modest contribution to housing supply in a sustainable Herne Bay location. The final scheme should nevertheless demonstrate that the site's capacity has been properly maximised through sensitive design, while coordinating fully with the adjoining Herne Bay Driving Range permission and the wider carried forward Herne Bay Golf Club allocation, and securing the landscape, biodiversity, open space and pipeline safeguards identified in the policy.
Policy HB8: Land to the east of Bullockstone Road	CPRE Kents Comments
Do you consider that Policy HB8: Land to the east of Bullockstone Road is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent maintains concern with Policy HB8, Land to the east of Bullockstone Road. We recognise that the site is mixed use rather than wholly greenfield, with some existing structures associated with animal rescue and equestrian use. However, the Council's own SLAA still identifies the site as unsuitable for housing because it lies within protected Existing Open Space and would conflict with Policy OS9 of the adopted Local Plan. The Development Strategy Topic Paper confirms that the wider open space was previously recommended for continued protection because of its role as green infrastructure between the former Herne Bay Golf Course, the Thanet Way and Strode Farm. In our view, the presence of some brownfield elements does not justify the piecemeal erosion of that wider green infrastructure function, particularly in an area of Herne Bay which has already absorbed substantial growth. Policy HB8 is therefore not fully justified unless the Council can demonstrate that the loss of protected open space would not undermine the integrity, connectivity or amenity value of the wider designation.
Policy HB9: Land at Home Farm Strode Park	CPRE Kents Comments
Do you consider that Policy HB9: Land at Home Farm Strode Park is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you	CPRE Kent remains concerned that this part of Herne Bay has already absorbed significant growth through Strode Farm, the former Golf Course and other nearby allocations, and that a further

consider the policy to be sound, please use this box to set out your comments.	200 dwellings at Home Farm risks adding to pressure on local infrastructure and eroding the green setting of this part of the town unless very carefully controlled. Particular regard should also be had to the setting and amenity of the adjoining crematorium, where tranquillity and dignity must be protected, and to the IDP's confirmation that sewerage network reinforcement will be needed before the development can be fully occupied. Policy HB9 should therefore be tightened to ensure that landscape, access, wastewater, open space and crematorium amenity issues are resolved before the site is relied upon as deliverable.
Policy HB10: Land to the west of Bullockstone Road	CPRE Kents Comments
Do you consider that Policy HB10: Land to the west of Bullockstone Road is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 39. Do you consider that the policy is legally compliant? Yes No 40. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent raises a concern with Policy HB10, Land to the west of Bullockstone Road. We note that the allocation is limited to the north eastern part of a wider mixed site, but it would still consolidate further edge of settlement growth in south Herne Bay, in an area already subject to significant cumulative development through Strode Farm, Herne Bay Golf Course and nearby allocations. If retained, the policy should be tightly controlled so that development is limited to the land assessed as suitable, protects the wider rural setting and separation from Bullockstone, and fully secures the required landscape buffers, tree protection, access, active travel, heritage and biodiversity measures.
Policy HB11: Altira	CPRE Kents Comments
Do you consider that HB11: Altira is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	No comment
Policy HB12: Moyne	CPRE Kents Comments
Do you consider that HB12: Moyne is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please	CPRE Kent supports Policy HB12 in principle, as Moyne is identified as a brownfield site and the policy would deliver a modest residential allocation of around 25 homes at an efficient density of around 80 dwellings per hectare. The final scheme should,

use this box to set out your comments. compliant, please use this box to set out your comments.	however, ensure that capacity is sensitively maximised while coordinating with Blacksole Farm, addressing neighbouring commercial uses, noise from the A299 and railway, archaeological potential, open space within the gas pipeline buffer and access via Blacksole Farm only.
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Chapter 5: Rural

Policy R1: Rural Service Centres	CPRE Kents Comments
Do you consider that Policy R1: Rural Service Centres is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy R1 insofar as it seeks to sustain rural communities by protecting and enhancing local services, community facilities, employment opportunities, open space and active travel connections. Rural communities are living places and should be allowed to evolve, but that must be achieved without eroding the countryside, tranquillity, landscape character and settlement gaps which make those communities so valued. In that context, and having regard to the emerging NPPF emphasis on clearly defined settlement boundaries, CPRE Kent considers that the boundaries for Rural Service Centres must be tightly drawn around the existing built form and should not include undeveloped village edges, important open spaces, valued views or land whose development would weaken rural character. Policy R1 should also make clear that infill and brownfield redevelopment will only be supported where it is genuinely small scale, appropriate to the character and function of the settlement, supported by sustainable transport and local services, and does not harm landscape, heritage, biodiversity, tranquillity or the setting of the surrounding countryside
Policy R2: Great Pett Farmyard	CPRE Kents Comments
Do you consider that Policy R2: Great Pett Farmyard is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 7. Do you consider that the policy is legally compliant? Yes No 8. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent supports Policy R2 in principle, as a modest brownfield allocation of around nine dwellings within Bridge, but any scheme must remain genuinely farmstead in character, respect the Kent Downs National Landscape, conserve and enhance the setting of the historic farmstead, Great Pett Farmhouse and associated locally listed buildings, and secure appropriate landscape buffers and walking and cycling links to the village.
Policy R3: Chartham Paper Mill	CPRE Kents Comments
Do you consider that Policy R3: Chartham Paper Mill is sound? Please indicate your	Yes

view on each of the following soundness tests:	
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy R3 in principle, as Chartham Paper Mill is genuine brownfield land in a sustainable Rural Service Centre location, with good rail, bus and Great Stour Way connections. We note that the policy now proposes approximately 165 dwellings, local shopping and community facilities, and an average net density of around 35 dwellings per hectare, while the Topic Paper recognises both the regeneration benefits and the site's significant constraints, including flood risk, priority habitat, the River Stour corridor, heritage sensitivity and the former industrial use. The final scheme should therefore demonstrate that the site's capacity has been properly maximised, while securing robust flood risk, contamination, water quality, nutrient neutrality and ecological safeguards, particularly given the site's proximity to the River Stour and the need for wider Chartham wastewater upgrades
Policy R4: Land at Ashford Road (west)	CPRE Kents Comments
Do you consider that Policy R4: Land at Ashford Road (west) is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	No comment .
Policy R5: Land at Ashford Road (east)	CPRE Kents Comments
Do you consider that Policy R5: Land at Ashford Road (east) is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	<i>No comment</i>
Policy R6: Bread and Cheese Field	CPRE Kents Comments
Do you consider that Policy R6: Bread and Cheese Field is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent maintains concern with Policy R6, Bread and Cheese Field. We recognise that Hersden is identified as a Rural Service Centre and that the Council now presents the site as consolidating development south of the A28, adjacent to the Hoplands development, with Policy R6 providing for around 150 dwellings at approximately 35 dwellings per hectare. However, the policy requirements themselves demonstrate that this is not an

	unconstrained site, with the need for an odour assessment because of the adjacent wastewater treatment works, landscape buffers to the south, west and north, protection of nearby ancient woodland, viewing corridors to the Stour Valley and consideration of turtle dove habitat. CPRE Kent therefore considers that the allocation is not yet fully justified unless the Council can demonstrate that the cumulative impacts of further growth around Hersden, Westbere, Sturry and Broad Oak can be accommodated without eroding settlement separation, harming landscape character, damaging biodiversity or placing further pressure on local infrastructure.
Policy R7: Land at Hersden	CPRE Kents Comments
Do you consider that Policy R7: Land at Hersden is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	The site should be carefully coordinated with the carried forward Site 8 allocation, with access, walking and cycling links, ancient woodland buffering, landscape enhancement and any proportionate Sturry Link Road contribution secured before it is relied upon as deliverable.
Policy R8: Land at former Spires Academy	CPRE Kents Comments
Do you consider that Policy R8: Land at former Spires Academy is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	The scheme should be carefully contained, with the required landscape buffer to priority habitat, retention of boundary trees, open space within the gas pipeline buffer zone and new footway links fully secured before it is relied upon as deliverable.
Policy R9: The Hill, Littlebourne	CPRE Kents Comments
Do you consider that Policy R9: The Hill, Littlebourne is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent remains deeply disappointed that outline planning permission has now been granted for R9, The Hill, Littlebourne, but that does not remove our concerns. The allocation remains a substantial greenfield extension to the village, with unresolved detailed matters still to come forward through reserved matters and discharge of conditions, including drainage, sewage, flooding, landscape, traffic, pedestrian and cycle safety, and the protection of the rural character of Littlebourne. The Meeting Development Needs Topic Paper now records outline permission for CA/23/00484 and assumes first completions in 2029/30, with the link road between The Hill and Bekesbourne Lane to be provided

	before no more than 50 dwellings are occupied. That trigger is now critical and must be carried through into Policy R9 with absolute clarity. The policy should also make clear that the grant of outline permission is not a reason to dilute the safeguards needed at reserved matters stage, nor to treat the site as evidence that further growth around Littlebourne or East Canterbury is automatically acceptable. If retained, Policy R9 must secure the link road, wastewater and drainage solutions, pedestrian and cycle improvements, landscape buffers, open space, biodiversity measures and community facilities before the site is relied upon as genuinely deliverable.
Policy R10: Land north of Court Hill	CPRE Kents Comments
Do you consider that Policy R10: Land north of Court Hill is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent raises concern with Policy R10. The site is mixed, comprising agricultural land and existing commercial or farm buildings, and is proposed for around 50 dwellings with business or commercial space. If retained, the policy must ensure the business space and Scout Group storage are properly re-provided, landscape buffers protect the village edge and countryside, safe walking and cycling links are secured, rural lanes are not harmed, and sewerage reinforcement is in place before full occupation.
Policy R11: Land North of Popes Lane	CPRE Kents Comments
Do you consider that Policy R11: Land North of Popes Lane is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent notes that Policy R11 now reflects a site with resolution to grant planning permission, subject to completion of the Section 106 agreement, for around 120 dwellings on the southern part of the site, with the northern part retained within an extended Green Gap between Sturry and Broad Oak. We welcome the continued protection of that Green Gap, but the policy must still ensure that no residential development encroaches into it, that landscape and ecological buffers are secured, that heritage impacts around Sweech Farm are addressed, that safe walking and cycling links are delivered, and that any required contribution to the Sturry Link Road is secured before the site is treated as deliverable.
Policy R12: Land at The Paddocks, Shalloak Road	CPRE Kents Comments
Do you consider that Policy R12: Land at The Paddocks, Shalloak Road is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent maintains concern with Policy R12. The policy itself recognises the need to focus development in the southern part of the site, provide open space to the north, buffer Shalloak Road and the ancient woodland to the east, and respond to the Stour Valley Slopes landscape character area. The IDP also confirms that sewerage network reinforcement will be needed before the development can be fully occupied. If retained, Policy R12 should therefore be tightened so that development remains fully dependent on delivery through the wider Site 2 framework, protects ancient woodland, priority habitat, landscape character and BMV agricultural land, prevents any access pressure on Shalloak Road, and secures wastewater capacity before the site is relied upon as deliverable.
Policy R13: Local Service Centres	CPRE Kents Comments
Do you consider that Policy R13: Local Service Centres is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of sustaining rural communities, but remains concerned that Policy R13 gives too much weight to settlement hierarchy status without sufficiently testing whether each Local Service Centre is genuinely sustainable in transport terms. We previously raised concern that a number of smaller villages, including Adisham, Broad Oak, Hoath, Petham, Rough Common and Wickhambreaux, had been promoted despite limited or no conveniently located regular bus service, and that concern remains. The Transport Strategy itself recognises that villages accessed by rural roads often have much more infrequent services, that some rural locations have no bus provision, and that demand responsive transport would require future funding. CPRE Kent is therefore particularly concerned that the settlement hierarchy no longer appears to treat a regular bus service as a prerequisite for Local Service Centre status. That is a fundamental weakness, because a settlement with no public transport cannot sensibly be treated as a sustainable location for housing simply because it has two local facilities, where residents would still need to drive for most day to day needs. In that context, development should not be assumed sustainable simply because it falls within a Local Service Centre boundary. This is also consistent with the direction of travel in the draft NPPF reforms, which place renewed emphasis on clear settlement boundaries, or clear criteria for identifying settlements, to distinguish development within and outside settlements. Policy R13 should therefore be strengthened so that settlement boundaries are tightly drawn around the existing built form, exclude undeveloped village edges, valued open spaces and land important

	to rural character, and only support limited infill or brownfield redevelopment where day to day needs can realistically be met without locking in car dependency or harming countryside, tranquillity, landscape character, rural lanes, settlement setting or biodiversity.
Policy R14: Land west of Cooting Lane and south of Station Road	CPRE Kents Comments
Do you consider that Policy R14: Land west of Cooting Lane and south of Station Road is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	No comment
Policy R15: Land adjacent to Valley Road	CPRE Kents Comments
Do you consider that Policy R15: Land adjacent to Valley Road is sound? Please indicate your view on each of the following soundness tests:	N/a – see comment below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent does not object to Policy R15 in principle, given its modest scale, but notes that the site lies within the Kent Downs National Landscape and therefore requires particular care. We recognise that the allocation is modest, at around 20 dwellings, and that the policy already acknowledges the need for a low density design sensitive to the site's location within the Kent Downs National Landscape, including wording that development should further the conservation and enhancement of its natural beauty. However, this is still greenfield development within a nationally protected landscape, and the Council must be able to demonstrate not only that harm is minimised, but how the allocation positively responds to the enhanced duty under section 85 of the Countryside and Rights of Way Act 2000. Policy R15 should therefore make this requirement explicit, with the final scheme required to show how it furthers the conservation and enhancement of the Kent Downs National Landscape, protects the setting of Barham and nearby heritage assets, avoids Flood Zones 2 and 3, secures appropriate Nailbourne access, and delivers landscape and biodiversity enhancements informed by the Kent Downs Management Plan.
Policy R16: Land at Goose Farm, Shalloak Road	CPRE Kents Comments
Do you consider that Policy R16: Land at Goose Farm, Shalloak Road is sound? Please indicate your view on each of the following soundness tests:	N/a

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 55. Do you consider that the policy is legally compliant? Yes No 56. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	No comment
Policy R17: Land at Shalloak Road	CPRE Kents Comments
Do you consider that Policy R17: Land at Shalloak Road is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	No comment
Policy R18: Land fronting Mayton Lane	CPRE Kents Comments
Do you consider that Policy R18: Land fronting Mayton Lane is sound? Please indicate your view on each of the following soundness tests:	N/a
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	No comment
Policy R19: Land at Church Farm	CPRE Kents Comments
Do you consider that Policy R19: Land at Church Farm is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 67. Do you consider that the policy is legally compliant? Yes No 68. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you	CPRE Kent objects to Policy R19 as drafted. Hoath has been reclassified as a Local Service Centre for the purposes of this plan, yet the proposed allocation at Church Farm does not appear to be in a genuinely sustainable location. The site would deliver only around 17 dwellings, or 21 under the current planning application, but would represent a significant proportional increase to a small rural settlement with no public transport options whatsoever, no shop, no secondary school, no GP surgery and no pharmacy. We understand that the Council's own Transportation Team Leader has advised, in relation to application CA/25/01783, that the site

consider the policy to be legally compliant, please use this box to set out your comments.	does not have sustainable transport links and that the nearest public transport services are too far away to be meaningfully accessible. If that is the Council's own transport evidence at application stage, it is difficult to see how the allocation can be justified as sustainable in the Local Plan. Policy R19 is therefore not justified or effective unless the Council can demonstrate, with clear evidence, that day to day needs can be met without reliance on the private car, that safe pedestrian access to the school and any community facility can be secured, and that the rural character, BMV agricultural land, Stour catchment impacts and local lane network have been properly assessed. Without that evidence, the allocation should be deleted.
Policy R20: Countryside	CPRE Kents Comments
Do you consider that Policy R20: Countryside is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy R20 in seeking to protect the countryside from inappropriate development and welcomes the clear definition of countryside as land outside the Urban Areas, Rural Service Centres and Local Service Centre boundaries. However, the policy should be strengthened if it is to be fully effective and consistent with national policy. The countryside is not simply land left over after settlement boundaries have been drawn, but a valued resource in its own right, important for landscape character, tranquillity, dark skies, biodiversity, farming, public access and the identity of rural communities. CPRE Kent therefore considers that Policy R20 should make clearer that development in the countryside must be genuinely necessary in that location, must avoid harm to rural character wherever possible, and must protect rural lanes, public rights of way, settlement gaps, valued views and tranquillity. We are also concerned that the wording on agricultural and viticulture development refers to adverse impacts being "appropriately mitigated", whereas the starting point should be avoidance of harm, particularly in the Kent Downs National Landscape and other sensitive landscapes. The policy should therefore be modified so that rural economic activity is supported only where it is sensitively located and designed, avoids unnecessary landscape and highways harm, and, where relevant, demonstrably furthers the conservation and enhancement of the Kent Downs National Landscape. As a related point, CPRE Kent is concerned that the Regulation 19 plan no longer appears to carry forward the specific rural lanes protection previously provided by Policy T16 of the adopted Local Plan. This is a material omission. Rural lanes are part of the district's landscape, biodiversity and historic character, often providing wildlife corridors, dark corridors, public access routes

	and tranquil approaches to settlements. Their hedgerows, verges, trees, banks, ditches and roadside habitats can be easily damaged by widening, lighting, kerbing, visibility splays, signage and increased traffic. Policy R20 should therefore be strengthened so that development in the countryside, or development which materially increases traffic on rural lanes, is only supported where it protects rural character, tranquillity, biodiversity, dark skies, historic features and recreational value, and avoids urbanising highway works.
Policy R21: Land at Canterbury Business Park	CPRE Kents Comments
Do you consider that Policy R21: Land at Canterbury Business Park is sound? Please indicate your view on each of the following soundness tests:	No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent objects strongly to Policy R21, Land at Canterbury Business Park. This is one of the clearest examples of where the plan is not justified, not effective and not consistent with national policy. The site is within the Kent Downs National Landscape, where national policy requires the highest level of protection, and the Council's own SLAA records the site as unsuitable for the proposed use because it is fully within the National Landscape and raises landscape and heritage concerns. Yet the plan still allocates the site for approximately 31,200 sqm of B8 floorspace, including viticulture processing and storage, together with supporting commercial and business uses. The Council's justification is not strong enough to meet the national policy test for major development in a National Landscape. The Development Strategy Topic Paper says the red line has been reduced and that landscape work has identified mitigation, but it also records that the Landscape and Visual Appraisal does not itself seek to justify the allocation, that no specific designs or development proposals have yet been assessed in detail, and that a more refined assessment would only come forward at planning application stage. That is not enough for a Local Plan allocation in a nationally protected landscape. The question is not simply whether harm can later be reduced through design, but whether there are exceptional circumstances and whether the development is in the public interest, having considered the need for the development, the cost and scope for developing elsewhere outside the designated area, and the effect on the environment, landscape and recreational opportunities. The alternatives have not been properly exhausted. The Council says it has been unable to identify suitable alternative locations for B8 and viticulture outside the Kent Downs National Landscape, but

	that is not the same as demonstrating that all reasonable alternatives have been assessed. Those alternatives must include the reuse, repurposing and intensification of existing employment land and buildings. The case for R21 is also weakened by Chapel Down abandoning its proposed £32m Canterbury winery, with reporting stating that the company no longer requires a new standalone winery and will instead use existing facilities and spare third party capacity in Kent. The allocation also needs to be seen in the context of CPRE Kent's wider concern that the plan over provides for employment floorspace. The March 2025 Economic Development Needs Study identifies a gross labour demand requirement of 123,705 sqm, but much lower figures of 61,370 sqm under the 2014 SNPP labour supply scenario and 68,240 sqm under the past take up scenario. The Council has carried forward the higher demand led figure and then uses the claimed B8 shortfall to justify major development in the National Landscape. In CPRE Kent's view, that is not a justified approach. It risks allocating sensitive greenfield land for employment uses which may not come forward as planned and which could later be subject to pressure for alternative uses, including housing. Policy R21 is also not consistent with the Council's enhanced duty under section 85 of the Countryside and Rights of Way Act 2000 to seek to further the purpose of conserving and enhancing the natural beauty of the Kent Downs National Landscape. The policy includes wording about furthering conservation and enhancement, but the evidence does not yet demonstrate how a major B8 allocation in this location would in fact further that statutory purpose. It is not enough to assert that landscape harm can be mitigated. The Council must show, at allocation stage, that the development would positively further the conservation and enhancement of the National Landscape, and that reasonable alternatives outside it, including existing employment sites, have been properly considered. Policy R21 should therefore be deleted from the plan. If the Council nevertheless seeks to retain it, the allocation must at the very least be substantially reduced, tightly limited to genuinely evidenced viticulture uses which cannot be accommodated elsewhere, and made subject to a prior review of existing and vacant employment sites. Without that work, Policy R21 is not justified, not effective, not consistent with national policy and not shown to comply with the enhanced statutory duty for the Kent Downs National Landscape.
Policy R22: Barham Layby	CPRE Kents Comments

Do you consider that Policy R22: Barham Layby is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent maintains concern with Policy R22, Barham Layby. The site is within the Kent Downs National Landscape, where the starting point must be the conservation and enhancement of natural beauty, not merely mitigation of harm. The proposal would introduce additional HGV parking, lighting, noise and activity into a sensitive rural location, with potential effects on tranquillity, dark skies, landscape character and woodland cover. The Council's conclusion that the site would not amount to major development does not remove the need to demonstrate how the proposal complies with the enhanced section 85 CROW Act duty and why less sensitive alternatives on the A2 corridor, including existing hardstanding or transport related land, have been fully considered. If retained, Policy R22 should be strengthened so that any scheme is strictly limited to essential replacement provision, avoids unnecessary tree loss, uses no or minimal low impact lighting, protects dark skies and tranquillity, and demonstrably furthers the conservation and enhancement of the Kent Downs National Landscape
Policy R23: Land to the South of Sturry Road	CPRE Kents Comments
Do you consider that Policy R23: Land to the South of Sturry Road is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy R23, as strategic wetland creation could make an important contribution to nutrient mitigation, nature recovery and the long term restoration of Stodmarsh. However, the policy should be treated with caution in soundness terms. The Local Plan says the site is allocated to deliver strategic wetland as part of the Canterbury Nutrient Mitigation Strategy, and the IDP confirms that R23 is intended to offset nitrogen and phosphate impacts at Stodmarsh, but also records that the cost, funding mechanism and delivery timescale remain to be confirmed. This means R23 should not be relied upon to justify otherwise harmful or premature housing growth unless the wetland is funded, deliverable, secured, monitored and effective before the development depending on it comes forward.
Do you consider that the policy is legally compliant?	No
Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be	CPRE Kent recognises that Stour Environmental Credits is now established and that permanent phosphorus and nitrogen credits are available to purchase. However, if Policy R23 is relied upon as part of the plan's strategic nutrient mitigation for Stodmarsh, the

legally compliant, please use this box to set out your comments.	Council must still demonstrate with clarity how that specific wetland will be secured, funded, delivered, monitored and integrated with the SEC credit system.
Policy R24: Broad Oak Reservoir and Country Park	CPRE Kents Comments
Do you consider that Policy R24: Broad Oak Reservoir and Country Park is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent continues to raise significant concerns with Policy R24, Broad Oak Reservoir and Country Park. We recognise the need for long term water resilience, and we also recognise that, if the reservoir is ultimately consented, there may be opportunities for public access, habitat creation and quiet countryside recreation. However, as set out in our overarching comments, the plan cannot treat Broad Oak as a secure answer to Canterbury's water supply constraints until it has been shown to be deliverable, environmentally acceptable and genuinely preferable to less damaging alternatives. The IDP identifies the reservoir, water treatment works and recreational facilities as infrastructure needed to support development in the district, with an estimated cost of £362m and a medium term delivery assumption, while associated distribution infrastructure to Blean still has costs to be confirmed. That is a significant effectiveness issue where the wider housing strategy is already constrained by water supply. CPRE Kent's recent response to the Broad Oak Water consultation made clear that our principal concern remains abstraction and the wider hydrological consequences for the Stour catchment and the Sarre Penn. South East Water's material identifies abstraction from the Little Stour and Great Stour, together with realignment of the Sarre Penn around the reservoir site, which is a very substantial intervention in an already sensitive catchment. We also highlighted that the Stour catchment is one of the most water stressed areas in the UK, with the Environment Agency's abstraction strategy identifying West Stourmouth as a location where consumptive abstraction may be available less than 30 per cent of the time, and potentially only around 54 days per year. These matters are directly relevant to soundness because the environmental and operational case for the scheme remains unproven. We also remain concerned about hydrogeology, water quality, ecology, pipelines and the future use of the site. The application will need to assess the reservoir's interaction with groundwater, former mineral workings and the nearby Shelford landfill, and must address the fact that the site is bounded by SSSIs and ancient woodland and has substantially re naturalised over time. The

	pipeline works are also significant, with South East Water identifying a raw water pipeline of around 13km and a treated water pipeline of around 7km, mostly to be laid in open trenches, which will require full route specific evidence on ecological effects, hydrology, landscape harm, traffic, noise and restoration. Policy R24 should therefore be strengthened so that it does not present the reservoir or country park as a settled benefit before the fundamental environmental and delivery questions have been answered. It should require a precautionary assessment of abstraction, water quality, catchment effects, Stodmarsh implications, groundwater, ecology, pipeline routing, construction impacts and long term management. Any public access should be low key, nature focused and compatible with tranquillity, landscape protection and biodiversity.
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Chapter 6: District-wide Strategic Policies

Policy DS1: Affordable housing	CPRE Kents Comments
Do you consider that Policy DS1: Affordable housing is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the objective of Policy DS1, but remains concerned that it does not yet provide a sufficiently strong or effective response to Canterbury's affordability crisis. The Council's own evidence identifies a need for 13,205 affordable homes over the plan period, yet the supply identified through the plan would meet only 45 per cent of that need, leaving an outstanding requirement of 7,281 affordable homes. The concern is sharper still in relation to tenure, because the Housing Needs Assessment identifies a need split of 50 per cent affordable rent, 30 per cent social rent and 20 per cent affordable home ownership, while Policy DS1 proposes only 10 per cent social rent and 30 per cent affordable home ownership. We recognise the viability evidence which has led the Council to reduce the brownfield requirement to 15 per cent and remove some contributions from student and sheltered housing, and we do not want brownfield regeneration made undeliverable. However, that only reinforces the need for a more proactive affordable housing strategy alongside the policy, including maximising affordable and social rent on publicly owned land, regeneration sites and higher value greenfield sites, using review mechanisms where viability improves, and ensuring that any reduction in affordable housing or social rent is genuinely exceptional and robustly evidenced.
Policy DS2: Housing mix	CPRE Kents Comments
Do you consider that Policy DS2: Housing mix is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy DS2 in seeking to secure a mix of housing that responds to local need, including smaller homes, family housing, accessible homes and specialist accommodation. However, the policy must be applied in a way that genuinely reflects local affordability and demographic need, rather than simply allowing large greenfield sites to deliver market-led housing mixes that do little to address the district's most acute need for smaller, affordable and social rented homes.
Policy DS3: Estate regeneration	CPRE Kents Comments
Do you consider that Policy DS3: Estate regeneration is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you	CPRE Kent supports the principle of Policy DS3 where estate regeneration improves housing quality, energy efficiency, public

consider the policy to be sound, please use this box to set out your comments.	realm, green space and community facilities. However, it must be applied so that regeneration delivers clear benefits for existing residents, with no net loss of genuinely affordable or social rented homes, proper resident involvement, a right to return where homes are replaced, and protection of valued open space, mature trees and community assets.
Policy DS4: Rural housing	CPRE Kents Comments
Do you consider that Policy DS4: Rural housing is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 15. Do you consider that the policy is legally compliant? Yes No 16. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent broadly supports the intent of Policy DS4 in recognising the need for genuinely affordable rural housing, but the policy should be tightened so that rural housing remains exceptional, locally justified and sensitive to place. We welcome the requirements for rural exception sites to be supported by a local housing needs survey, be proportionate to the settlement and be directly adjacent to an Urban Area, Rural Service Centre or Local Service Centre, but the policy should also make clearer how conversions of rural buildings to dwellings will be assessed, with an explicit cross reference to Policy DM1 and to the need to protect rural character, farmstead form and local distinctiveness. The Council will also need to ensure that infill development within villages and hamlets, or development directly adjacent to settlement boundaries, does not incrementally alter the character, scale or tranquillity of the settlement, and that any housing provided is commensurate with local need rather than simply adding market housing in unsustainable rural locations.
Policy DS5: Specialist housing provision	CPRE Kents Comments
Do you consider that Policy DS5: Specialist housing provision is sound? Please indicate your view on each of the following soundness tests:	N/a – no comment
Policy DS6: Gypsy and Traveller Accommodation	CPRE Kents Comments
Do you consider that Policy DS6: Gypsy and Traveller Accommodation is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy DS6 and the Council's intention to meet the identified need for Gypsy and Traveller accommodation through a planned and properly evidenced approach. Providing sufficient, suitable and well located pitches through the Local Plan is important not only in meeting the needs of Gypsy and Traveller communities, but also in maintaining a genuinely plan led system by reducing pressure for unallocated, poorly located or unauthorised sites in the countryside. The policy should therefore be applied positively, while ensuring that new

	provision is sensitively designed, appropriately landscaped and supported by safe access, services and infrastructure.
Policy DS7: Business and employment development	CPRE Kents Comments
Do you consider that Policy DS7: Business and employment development is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent remains concerned that the employment land strategy underpinning this policy is not justified or effective. As set out in our comments on Policy SS4, the plan continues to rely on an over provision of employment floorspace, despite the lower labour supply and past take up scenarios in the March 2025 evidence, and this risks allocating greenfield land for employment uses which may have little realistic prospect of coming forward as intended. That concern is most acute at Highland Court, now R21 Canterbury Business Park, where a major employment allocation is still being pursued within the Kent Downs National Landscape despite changed market circumstances, the loss of the original Chapel Down justification, and the absence of a convincing demonstration that existing employment sites and buildings cannot meet the identified need. Without a clearer review of the employment requirement and the deletion or substantial reduction of the Highland Court allocation, the policy is not justified, not effective and, in respect of R21, not consistent with national policy
Policy DS8: Education and associated development	CPRE Kents Comments
Do you consider that Policy DS8: Education and associated development is sound? Please indicate your view on each of the following soundness tests:	N/a – see comment below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy DS8 insofar as it provides a positive framework for education and associated development within existing education campuses. However, the policy must not be read as support for further outward expansion of the University of Kent into the Blean or surrounding countryside. That point is especially important given the previous C12 proposal north of the University of Kent, which has now been deleted after being found unsuitable because of access, highway and ecological concerns, including the loss of ancient woodland. The Local Plan rightly states that university related development in Canterbury should be focused within designated university campuses, in line with Policy DS8. Policy DS8 should therefore be applied and, if necessary, amended so that support is directed to the sustainable renewal, reuse and intensification of existing campus land and buildings, rather than any further encroachment into the Blean Woodland Complex, ancient woodland, open countryside or sensitive rural edges.

Policy DS9: Town centres and community facilities	CPRE Kents Comments
Do you consider that Policy DS9: Town centres and community facilities is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy DS9, particularly its focus on protecting town centres, local centres and community facilities as places that support everyday life, social connection and local economic vitality. The new Canterbury, Whitstable and Herne Bay town centre strategies are welcome in this respect, and they correctly identify the need to bring vacant and underused spaces back into active use, improve public realm, strengthen cultural and community uses and support more resilient centres. However, those strategies remain high level guiding documents rather than detailed, costed and deliverable regeneration programmes. Policy DS9 should therefore be strengthened so that town centre and community facility protection is linked more directly to early delivery of the strategy work, clear action plans and a strong presumption against the loss of valued community assets unless equivalent or better provision is secured.
Policy DS10: Tourism development	CPRE Kents Comments
Do you consider that Policy DS10: Tourism development is sound? Please indicate your view on each of the following soundness tests:	Yes/No The policy is not positively prepared The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy DS10 insofar as it seeks to grow the visitor economy in a managed way, particularly where tourism development strengthens existing town centres, supports rural communities and makes use of existing buildings. However, tourist accommodation should be located as sustainably as conventional residential development, with isolated rural schemes resisted where they would add traffic to local lanes, harm tranquillity or fail to support nearby settlements.
Policy DS11: Rural economy	CPRE Kents Comments
Do you consider that Policy DS11: Rural economy is sound? Please indicate your view on each of the following soundness tests:	No The policy is not justified The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments..	CPRE Kent supports the principle of Policy DS11 in seeking to sustain the rural economy, including farming, horticulture, viticulture, agri-environment schemes and sensitive diversification. However, the policy is too weak in relation to Best and Most Versatile agricultural land. Given the scale of pressure on the district's countryside, the loss of BMV land should not be treated

	as something that can simply be mitigated or balanced away. Policy DS11 should require applicants to demonstrate, through clear evidence, that they have first considered sequentially preferable alternatives, including existing buildings, previously developed land, lower grade agricultural land and less sensitive locations, before any development involving the loss of BMV land is accepted. This is particularly important for rural economic development, where a generalised economic benefit should not be enough to justify the permanent loss of high quality agricultural land. The policy should therefore be amended so that avoidance of BMV loss is the starting point, with development on such land permitted only where there is a compelling locational need, no reasonable alternative, and where the scale, design and operation of the proposal would also protect landscape character, tranquillity, rural lanes, biodiversity, heritage and, where relevant, the Kent Downs National Landscape.
Policy DS12: Net zero carbon ready and water efficiency	CPRE Kents Comments
Do you consider that Policy DS12: Net zero carbon ready and water efficiency is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the ambition of Policy DS12 and welcomes the requirements for net zero carbon ready residential development, no on site fossil fuel use for space heating, hot water or cooking, Energy Statements, whole life carbon assessment for major development, and stronger standards for non residential buildings. However, we are concerned that the policy has been weakened from earlier aspirations around net zero operational carbon, and that “net zero carbon ready” must not become a lower standard in practice. Given Canterbury’s acute water stress and the plan’s reliance on major future water infrastructure, including Broad Oak, CPRE Kent also considers that the water efficiency element should be strengthened beyond the current 110 litres per person per day standard where justified, particularly as the Viability Study identifies the additional cost of moving to 100 litres per person per day as modest at around £350 per dwelling. Policy DS12 should therefore be tightened so that carbon and water performance are clearly measurable, independently verified, monitored after completion where appropriate, and treated as essential infrastructure requirements rather than optional design aspirations
Policy DS13: Sustainable design	CPRE Kents Comments
Do you consider that Policy DS13: Sustainable design is sound? Please indicate your view on each of the following soundness tests:	Yes

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 51. Do you consider that the policy is legally compliant? Yes No 52. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent supports the ambition of Policy DS13 and welcomes its emphasis on high quality, locally distinctive, climate responsive design which protects heritage, landscape character, biodiversity, public realm and residential amenity. However, the policy must be applied with real discipline if it is to be effective. This is particularly important for the plan's larger allocations, where poor design would compound the harm of greenfield release, and for brownfield regeneration sites, where higher density must be achieved through good placemaking rather than simply squeezing more units onto constrained land.
Policy DS14: Digital infrastructure	CPRE Kents Comments
Do you consider that Policy DS14: Digital infrastructure is sound? Please indicate your view on each of the following soundness tests:	No comment
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 55. Do you consider that the policy is legally compliant? Yes No 56. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	No comment
Policy DS15: Infrastructure delivery	CPRE Kents Comments
Do you consider that Policy DS15: Infrastructure delivery is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy DS15, but considers that it must do more to make infrastructure delivery genuinely effective. As set out in our overarching comments, the plan relies heavily on major infrastructure being delivered in step with growth, including transport measures, wastewater capacity, water supply, schools, health provision and community facilities, yet the recent experience of the 2017 Local Plan shows that large strategic sites can stall for years where key infrastructure is delayed, underfunded or dependent on complex agreements between multiple parties. Policy DS15 should therefore be strengthened so that development cannot proceed ahead of the infrastructure needed to make it sustainable, with clearer triggers, firmer funding and delivery responsibilities, and explicit contingency measures

	where critical infrastructure is delayed. Without that, the policy risks becoming a statement of intent rather than an effective mechanism for ensuring that growth is actually supported by the infrastructure on which the soundness of the plan depends.
Policy DS16: Movement Hierarchy	CPRE Kents Comments
Do you consider that Policy DS16: Movement Hierarchy is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 63. Do you consider that the policy is legally compliant? Yes No 64. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent supports Policy DS16 and welcomes the clear movement hierarchy which places walking, wheeling, cycling and public transport ahead of private car use. This is the right starting point if the plan is to reduce car dependency, improve air quality, support healthier communities and make better use of existing urban and village centres. However, the hierarchy must be applied intelligently and inclusively, recognising that walking and cycling will not be available to everyone, at all times, or for all journeys, particularly for older people, disabled people, young families and those affected by distance, gradients, weather or rural isolation.
Policy DS17: Active and sustainable travel	CPRE Kents Comments
Do you consider that Policy DS17: Active and sustainable travel is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments..	CPRE Kent supports Policy DS17 and welcomes its focus on making active and sustainable travel a practical part of new development, rather than an afterthought. However, for the policy to be effective, walking, cycling and public transport must be planned as a genuinely connected district wide network, not just as site specific provision within individual developments. This means filling missing links between towns, villages, schools, employment areas, stations, local centres and Canterbury itself, and ensuring that public transport is affordable, reliable, safe, accessible and timed around real journeys, including return trips and mode changes. Particular care is needed for older people, disabled people, young families and others for whom poor connections, long waits or difficult interchanges will be enough to prevent a shift away from the car. Policy DS17 should therefore be supported by clear delivery mechanisms and funding for both on site and off site improvements, so that sustainable travel becomes a realistic choice for everyday journeys rather than simply an aspiration attached to new development.
Policy DS18: Highways and parking	CPRE Kents Comments
Do you consider that Policy DS18: Highways and parking is sound? Please	No comment

indicate your view on each of the following soundness tests:	
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	No comment
Policy DS19: Air quality	CPRE Kents Comments
Do you consider that Policy DS19: Air quality is sound? Please indicate your view on each of the following soundness tests:	No comment
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 75. Do you consider that the policy is legally compliant? Yes No 76. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	No comment
Policy DS20: Habitats of international importance	CPRE Kents Comments
Do you consider that Policy DS20: Habitats of international importance is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 79. Do you consider that the policy is legally compliant? Yes No 80. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent supports the strong protective purpose of Policy DS20 and welcomes its clear recognition that development affecting internationally important habitats must be screened, appropriately assessed where necessary, and refused where adverse effects on integrity cannot be ruled out. However, this policy must be applied with real rigour given the scale of growth now proposed, particularly in relation to Stodmarsh, the Thanet Coast and Sandwich Bay SPA/Ramsar, the Swale SPA/Ramsar and functionally linked land. As set out in our overarching comments, the plan relies heavily on future wastewater provision, nutrient mitigation, wetland creation and strategic mitigation schemes to make its growth strategy acceptable. The Council must therefore ensure that any mitigation relied upon under DS20 is certain, funded, deliverable, legally secured, monitored and effective before development depending on it is permitted.
Policy DS21: Habitats and landscapes of national importance	CPRE Kents Comments

Do you consider that Policy DS21: Habitats and landscapes of national importance is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 83. Do you consider that the policy is legally compliant? Yes No 84. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	CPRE Kent strongly supports the protective intent of Policy DS21, particularly its recognition that development within the Kent Downs National Landscape must further the conservation and enhancement of natural beauty, including tranquillity and dark skies. This wording is welcome and reflects the enhanced duty under section 85 of the Countryside and Rights of Way Act 2000. However, the policy must be applied with real rigour, especially where the plan itself allocates or supports development in or affecting the National Landscape, including R21 at Canterbury Business Park and other rural allocations. It is not enough for applicants simply to show that harm can be mitigated; the policy should require clear evidence that alternatives outside the National Landscape have been properly considered and that any proposal would positively further the statutory purpose of conserving and enhancing natural beauty. Without that discipline, the protection offered by Policy DS21 risks being undermined by site specific allocations elsewhere in the plan. CPRE Kent also considers that Policy DS21 should give stronger practical protection to dark skies, particularly within and around the Kent Downs National Landscape, by requiring lighting to be avoided where unnecessary and, where essential, to be fully justified, minimised, downward facing, time limited and designed to protect tranquillity, nocturnal wildlife and rural character.
Policy DS22: Habitats, landscapes and sites of local importance	CPRE Kents Comments
Do you consider that Policy DS22: Habitats, landscapes and sites of local importance is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy DS22 and welcomes the clear protection it gives to habitats, landscapes and sites of local importance, including Local Wildlife Sites, Local Nature Reserves, Regionally Important Geological Sites, undeveloped coast, Local Green Spaces, Green Gaps and Green Infrastructure Spaces. These local designations play an essential role in protecting the character, distinctiveness, biodiversity and recreational value of the district, and are often the places most valued by local communities. The policy should be applied robustly so that locally important landscapes and habitats are not gradually eroded through piecemeal development or treated as less important simply because they are not nationally designated.

	The protection of locally valued landscapes should also include protection of tranquillity and dark skies, particularly where poorly controlled lighting would erode rural character, biodiversity value or the enjoyment of undeveloped coast, Green Gaps and Green Infrastructure Spaces.
Policy DS23: Flood risk	CPRE Kents Comments
Do you consider that Policy DS23: Flood risk is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 87. Do you consider that the policy is legally compliant? Yes No 88. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	The Stour is one of only 210 chalk streams in the world and a globally important ecosystem. And yet increasing urbanisation, abstraction and pollution (both from agricultural sources and from sewage surges) are causing serious damage. The Council needs to develop a long-term vision for the Stour which recognises its ecological significance and also its huge recreational value. This vision could be in the form of the Stour Valley Regional Park as recommended by the Kentish Stour Countryside Partnership. Given the likelihood of more extreme and unpredictable weather events, the capacity of the Stour's floodplain to slow the flow of floodwater should be enhanced.
Policy DS24: Sustainable Drainage and Water Quality	CPRE Kents Comments
Do you consider that Policy DS24: Sustainable Drainage and Water Quality is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments..	CPRE Kent supports the intent of Policy DS24 and welcomes the drainage hierarchy, the emphasis on SuDS, rainwater harvesting, greenfield run off rates, protection of groundwater and the requirement that development should not compromise Water Framework Directive objectives. However, as set out in our earlier comments, one of the clearest lessons from the 2017 Local Plan is that drainage, wastewater and wider water infrastructure cannot be left to be resolved late in the process. The Council's own evidence recognises that the district is water stressed, that SuDS should be considered early in design, and that sensitive water pollution areas require proper risk assessment. The IDP also confirms that significant wastewater upgrades, sewerage reinforcement and nutrient mitigation measures are still required across the district, including at Canterbury, Swalecliffe and strategic allocation sites. Policy DS24 should therefore be strengthened so that no development proceeds unless drainage, wastewater, water quality and groundwater protection measures are proven, funded, deliverable and secured ahead of occupation, with Grampian style controls used where necessary. Without that discipline, the plan risks repeating the familiar pattern of

	approving development in principle only for delivery to stall, or environmental harm to arise, because the infrastructure needed to support it was not in place.
Policy DS25: Supporting biodiversity recovery	CPRE Kents Comments
Do you consider that Policy DS25: Supporting biodiversity recovery is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 95. Do you consider that the policy is legally compliant?	CPRE Kent strongly supports Policy DS25 and considers that the 20% biodiversity net gain requirement for qualifying major development must be retained. This is one of the clearest and most positive elements of the plan, and is fully justified by Canterbury's local circumstances, including the scale of greenfield development proposed, the presence of internationally and nationally important habitats, the continuing pressures on Stodmarsh, the Blean Woodland Complex and the coast, and the urgent need to restore ecological connectivity across the district. We are aware that the draft new NPPF proposes to restrict local biodiversity net gain requirements above the statutory 10% level to specific site allocations where they are fully justified and deliverable, but in CPRE Kent's view Canterbury has exactly the kind of local evidence and environmental context that justifies going further. The Council's own viability evidence also supports the policy, noting that the main viability requirement is the 20% BNG standard, that green improvements on site are preferred, and that the costs of this intervention are modest and can largely be achieved through more thoughtful, locally appropriate planting and landscape design. CPRE Kent therefore urges the Council to defend Policy DS25 robustly at examination as a justified, effective and locally necessary response to biodiversity decline in Kent, and not to allow this important policy to be diluted through generic viability pressure or anticipated national policy change.
Policy DS26: Landscape Character	CPRE Kents Comments
Do you consider that Policy DS26: Landscape Character is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the intent of Policy DS26 and welcomes the recognition that landscape character, seascape, tranquillity, long distance views, historic landscape features and the setting of Canterbury must inform development proposals. However, the policy should be strengthened if it is to be effective. The valued landscapes of the district need to sit at the heart of the plan, with particular care given to new urban edges, skyline and hillside impacts, rural lanes, materials, lighting and the cumulative effect of development on the countryside. We remain concerned that the methodology and justification for changes to Local Landscape Designations is not always transparent, including where areas such

	as F7 around Chartham appear to have scored strongly but have not been designated, and this should be explained more clearly. We also consider that the policy should give stronger practical protection to dark skies, building on the supporting text which recognises that the Landscape Character Assessment identifies areas of tranquillity and dark skies. Development should avoid unnecessary lighting and, where lighting is essential, it should be fully justified, downward facing, time limited, low intensity and designed to protect tranquillity, nocturnal wildlife and rural character.
Policy DS27: The Blean Woodland Complex	CPRE Kents Comments
Do you consider that Policy DS27: The Blean Woodland Complex is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments..	CPRE Kent strongly supports Policy DS27 and welcomes the clear recognition that the Blean Woodland Complex is a fundamental part of the district's landscape character and ecological network. We particularly support the commitment to restore, enhance, expand and connect woodland habitats, including through rewilding, natural regeneration and wider landscape restoration, and the clear refusal of development that would damage the character, ecology, connectivity or integrity of the Blean Complex SAC. This policy should be applied robustly, including to development on surrounding land such as Broad Oak, so that the Blean is protected not only as a designated habitat, but as a living woodland landscape whose connectivity, tranquillity, biodiversity and setting must be improved over the plan period.
Policy DS28: Publicly accessible open space and sports	CPRE Kents Comments
Do you consider that Policy DS28: Publicly accessible open space and sports is sound? Please indicate your view on each of the following soundness tests:	No comment
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 107. Do you consider that the policy is legally compliant? Yes No 108. Please give precise details in the box below, including any changes you would suggest to make the policy legally compliant. If you consider the policy to be legally compliant, please use this box to set out your comments.	No comment

Policy DS29: Renewable and low carbon energy	CPRE Kents Comments
Do you consider that Policy DS29: Renewable and low carbon energy is sound? Please indicate your view on each of the following soundness tests:	No The policy is not effective The policy is not consistent with national policy
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent strongly supports the transition to renewable and low carbon energy, but considers Policy DS29 to be too reactive and insufficiently spatial. The policy gives support to renewable energy proposals and sets some useful criteria, but it does not amount to a proactive strategy for where renewable energy, particularly ground mounted solar, should be directed in Canterbury district. The Development Strategy Topic Paper confirms that 15 renewable energy sites were submitted through the Call for Sites, but none are proposed for allocation in the Regulation 19 plan. It also records that several were rejected for reasons including landscape impacts, effects on protected sites, heritage, ecology, transport and the loss of Best and Most Versatile agricultural land. That demonstrates the problem. The Council has evidence of pressure for large scale renewable development, but has not translated that evidence into a positive spatial framework which directs schemes to the least harmful locations. In soundness terms, CPRE Kent does not consider Policy DS29 to be justified or effective as drafted. It is not enough for the Local Plan simply to wait for speculative applications and then assess them case by case. That leaves communities, decision makers and developers with uncertainty, and risks repeated conflict over large industrial scale proposals in sensitive countryside. A sound plan should take control of the issue by identifying the preferred locations and clear locational principles for renewable energy, including rooftops, car parks, previously developed land, existing employment land, lower grade agricultural land and other less sensitive locations before Best and Most Versatile agricultural land or valued landscapes are considered. This is particularly important in Canterbury, where the same pressures that apply to housing, namely landscape sensitivity, heritage setting, biodiversity, water stress, rural lanes and loss of productive farmland, also apply to renewable energy infrastructure. The policy should therefore be strengthened to include a clear sequential approach. Ground mounted solar and other large scale renewable proposals should be required to demonstrate that they cannot reasonably be accommodated on rooftops, brownfield land, degraded land, lower grade agricultural land or other less sensitive sites before any loss of BMV agricultural land is accepted. Energy yield should not be treated as an overriding consideration. The proper planning judgement must be whether the benefits of the scheme outweigh its landscape, agricultural, ecological,

	heritage, amenity and cumulative impacts in that particular location. Policy DS29 should also make explicit that schemes causing significant harm to the Kent Downs National Landscape, Local Wildlife Sites, ancient woodland, historic landscapes, valued views, dark skies, tranquillity or the best farmland should be refused, even where they would make a contribution to renewable energy generation. We also consider that the policy should require robust safeguards on design, operation and restoration. This should include proper assessment of glint and glare, lighting, security fencing, battery storage, access tracks, construction traffic, cumulative landscape harm, grid infrastructure, soil protection, drainage, biodiversity delivery, public rights of way and long term decommissioning. Where schemes are acceptable in principle, they should be required to secure real nature recovery, meaningful community benefit and full restoration of the land at the end of the project. CPRE Kent therefore supports the objective of Policy DS29, but considers that it needs substantial modification. The Council should move from a permissive, reactive policy to a proactive renewable energy strategy which identifies where renewable energy should go, where it should not go, and what evidence must be provided before sensitive countryside or agricultural land is affected. Without that stronger spatial and sequential approach, Policy DS29 risks enabling exactly the kind of speculative, poorly located and controversial renewable energy development that a sound Local Plan should be designed to avoid.
Policy DS30: Historic environment and archaeology	CPRE Kents Comments
Do you consider that Policy DS30: Historic environment and archaeology is sound? Please indicate your view on each of the following soundness tests:	Yes
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy DS30 and welcomes its strong protection for the district's historic environment, including the requirement for Heritage Statements, Heritage Impact Assessments for proposals affecting the Canterbury World Heritage Site and its Buffer Zone, and proper consideration of cumulative impacts on Outstanding Universal Value. This is particularly important given the scale of growth proposed around Canterbury and the sensitivity of long distance views, setting and archaeological remains. However, the policy should go further in recognising that the significance of Canterbury Cathedral and the World Heritage Site is not experienced only within the formal buffer zone, but also through rural approaches to the city and surviving views in which the Cathedral rises above Canterbury within a wider landscape

	setting. Policy DS30 should therefore require major Canterbury edge allocations, particularly C10 Merton Park and C15 to C17 East Canterbury, to be supported by specific heritage and townscape evidence assessing long distance views, skyline effects, cumulative harm and the erosion of rural foregrounds. The Local Plan policies map should also identify and protect key views to and from the Cathedral, including surviving visual connections between the Cathedral and the surrounding countryside, so that development does not further erode views which contribute to the significance and Outstanding Universal Value of the World Heritage Site. We also welcome the positive approach to bringing redundant or underused historic buildings back into viable use, and to sensitive retrofit where this is consistent with conservation. The policy should be applied robustly so that heritage is not treated as a constraint to be worked around, but as a central part of the district's character, identity and regeneration potential.
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Chapter 7: Development Management

Policy DM1: Conversion of existing rural buildings	CPRE Kents Comments
Do you consider that Policy DM1: Conversion of existing rural buildings is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. 3	CPRE Kent notes Policy DM1 and welcomes the safeguards around character, tranquillity, landscape and the need to consider alternative business, tourism or community uses before residential conversion. Given likely changes to national policy, we reserve the right to comment further, but consider that this policy should continue to ensure that rural building conversions do not become a back door route to isolated new housing in the countryside.
Policy DM2: Residential garden land	CPRE Kents Comments
Do you consider that Policy DM2: Residential garden land is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent notes Policy DM2 and supports the careful management of garden land development within defined settlements. We support gentle densification where it reduces pressure for greenfield release, but the policy must ensure that such development respects local character, trees, amenity and townscape, and we reserve the right to comment further following publication of the new NPPF.
Policy DM3: Housing in multiple occupation (HMOs)	CPRE Kents Comments
Do you consider that Policy DM3: Housing in multiple occupation (HMOs) is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent notes Policy DM3 and recognises the importance of managing the cumulative impact of HMOs on the balance, character and cohesion of local communities. We do not raise a detailed soundness objection at this stage, but may wish to comment further if national policy changes affect the Council's ability to control housing mix and local amenity impacts.
Policy DM4: Reducing waste and supporting the circular economy	CPRE Kents Comments
Do you consider that Policy DM4: Reducing waste and supporting the circular economy is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you	CPRE Kent supports the principle of Policy DM4 and welcomes the emphasis on reusing materials, reducing construction waste and embedding circular economy principles.

consider the policy to be sound, please use this box to set out your comments.	
Policy DM5: Parking design	CPRE Kents Comments
Do you consider that Policy DM5: Parking design is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent notes Policy DM5 and supports the requirement for parking to be well designed, landscaped, permeable and not dominant in the street scene. The policy should remain aligned with the movement hierarchy and should not allow parking layouts to undermine walking, cycling, green infrastructure or place quality, especially on large allocations.
Policy DM6: Extensions and alterations to existing buildings	CPRE Kents Comments
Do you consider that Policy DM6: Extensions and alterations to existing buildings is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent notes Policy DM6 and supports its emphasis on ensuring that extensions and alterations respect the original building, the locality and neighbouring living conditions. We do not raise a detailed soundness objection at this stage, but reserve the right to comment further if national policy changes affect design, retrofit or heritage considerations.
Policy DM7: Health and Crime Impact Assessments	CPRE Kents Comments
Do you consider that Policy DM7: Health and Crime Impact Assessments is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports the principle of Policy DM7, particularly given the scale of growth proposed and the clear links between planning, public health, community safety and wellbeing.
Policy DM8: Shopfronts	CPRE Kents Comments
Do you consider that Policy DM8: Shopfronts is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent supports Policy DM8 and welcomes the protection of historic and architecturally valuable shopfronts. This is important for Canterbury, Whitstable, Herne Bay and the district's villages, where local distinctiveness and historic character are central to both place quality and regeneration.
Policy DM9: Advertisements	CPRE Kents Comments

Do you consider that Policy DM9: Advertisements is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent notes Policy DM9 and supports controls which prevent signage from harming historic character, visual amenity, public safety or residential amenity. W
Policy DM10: Residential annexes and ancillary accommodation	CPRE Kents Comments
Do you consider that Policy DM10: Residential annexes and ancillary accommodation is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments..	CPRE Kent notes Policy DM10 and supports the requirement that annexes remain ancillary, subordinate and functionally connected to the main dwelling. This is particularly important in rural areas, where such accommodation should not become a route to new independent dwellings in the countryside.
Policy DM11: Residential design	CPRE Kents Comments
Do you consider that Policy DM11: Residential design is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. compliant, please use this box to set out your comments.	CPRE Kent supports the principle of Policy DM11, particularly the emphasis on adequate space standards, amenity, safe and healthy living environments and biodiversity measures within residential design
Policy DM12: Non-residential design	CPRE Kents Comments
Do you consider that Policy DM12: Non-residential design is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. use this box to set out your comments.	CPRE Kent supports the principle of Policy DM12 and welcomes its focus on accessible, healthy and adaptable non residential environments, including cycle parking, servicing, refuse and public facilities
Policy DM13: Biomass technology	CPRE Kents Comments
Do you consider that Policy DM13: Biomass technology is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below

Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. this box to set out your comments.	CPRE Kent notes Policy DM13 and supports the cautious approach to biomass, particularly the requirement for lower emission alternatives to be considered first and for air quality impacts to be assessed. We reserve the right to comment further if national policy changes alter the balance between renewable heat, air quality and local environmental protection.
Policy DM15: Light pollution and dark skies	CPRE Kents Comments
Do you consider that Policy DM15: Light pollution and dark skies is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.	CPRE Kent strongly supports the inclusion of Policy DM15 and welcomes the fact that the Regulation 19 plan now contains a specific policy on light pollution and dark skies. This reflects a point we have raised throughout the plan process. Dark skies are an important part of the district's rural character, tranquillity, biodiversity and landscape quality, particularly within and around the Kent Downs National Landscape, the Blean, the Stour Valley, the undeveloped coast and the district's smaller rural settlements. We particularly welcome the recognition that proposals in recognised dark sky areas should only be permitted in exceptional circumstances, and that lighting must be assessed against its wider setting, long distance visibility, impact on wildlife, impact on living conditions and effect on intrinsically dark landscapes. However, we consider the policy should be strengthened so that the starting point is avoidance of unnecessary lighting, not simply its mitigation. This matters because many of the plan's most sensitive allocations and infrastructure proposals, including rural employment development, Park and Bus facilities, HGV parking, sports facilities, renewable energy infrastructure and edge of settlement growth, could introduce new lighting into areas that are currently rural, tranquil and relatively dark. In such locations, lighting should only be permitted where it is demonstrably necessary, and where it is the minimum required for safety and operation. It should be fully shielded, downward facing, low intensity, warm colour temperature, time limited, motion controlled where appropriate, and designed to avoid light spill, glare, sky glow and harm to nocturnal species. Policy DM15 should also make clear that lighting strategies must be submitted at the earliest design stage for major development and for any proposal in or affecting the Kent Downs National Landscape, Local Wildlife Sites, ancient woodland, river corridors, undeveloped coast or rural lanes. These strategies should include baseline dark sky assessment, illuminance contour diagrams, cumulative impact assessment and long term management controls. Without this, there is a risk that dark skies are protected in principle but eroded in practice through piecemeal lighting

	introduced at reserved matters, discharge of conditions or operational stages. CPRE Kent therefore supports Policy DM15, but considers that these amendments would make it more effective and more consistent with national policy on limiting the impact of artificial light on intrinsically dark landscapes, nature conservation and local amenity
Policy DM16: Contamination and unstable land	CPRE Kents Comments
Do you consider that Policy DM16: Contamination and unstable land is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments. use this box to set out your comments.	CPRE Kent supports the principle of Policy DM16 and welcomes the requirement for proper investigation, assessment, remediation and monitoring where contamination, instability or hazardous substances are involved. This will be important for brownfield regeneration sites and former industrial or landfill related locations, and should be applied robustly so that regeneration does not create unacceptable risks to health, water quality or the environment.

Chapter 9: Monitoring Indicators

Appendix 6: Housing trajectory	Appendix 6: Housing trajectory
Do you consider that Appendix 6: Housing trajectory is sound? Please indicate your view on each of the following soundness tests:	N/a – see comments below
Please give precise details in the box below, including any changes you would suggest to make the appendix sound. If you consider the appendix to be sound, please use this box to set out your comments.	CPRE Kent welcomes the fact that Appendix 6 now includes a stepped housing trajectory, as this accepts the point we have consistently made that delivery cannot simply be assumed to jump immediately to the full local housing need figure. However, the trajectory remains too optimistic and therefore goes directly to the effectiveness of the plan under paragraph 36(c) of the NPPF. It relies on a sharp increase in delivery from large, complex and infrastructure dependent allocations at precisely the point when the district's recent delivery record, the experience of South Canterbury and Mountfield Park, current market conditions, water and wastewater constraints and unresolved transport dependencies all point the other way. In our view, Appendix 6 should be modified now so that the early and middle years are based on a genuinely realistic delivery rate, with the most complex strategic greenfield allocations, including East Canterbury and Merton Park, pushed later unless and until their infrastructure, land assembly, wastewater, transport and market delivery assumptions are proven. A flatter and more credible stepped trajectory would still allow the Council to meet the full housing requirement over the plan period, but would avoid building the soundness of the plan on delivery rates which have not been achieved in Canterbury and are unlikely to be achieved simply because sites are allocated. Without that modification, Appendix 6 does not provide a robust basis for concluding that the plan is effective.

Sustainability Appraisal and Habitats Regulations Assessment

Habitats Regulations Assessment	Habitats Regulations Assessment
Do you have any comments on the Regulation 19 draft Local Plan Habitats Regulations Assessment? To help us process your comments effectively please reference which section of the Habitats Regulations Assessment you are commenting about. Please provide any evidence you have to support your comments.	CPRE Kent notes the HRA and recognises that it concludes, at this stage, that the Regulation 19 draft Local Plan would not give rise to adverse effects on the integrity of European sites, subject to the mitigation and policy safeguards identified. However, the HRA also makes clear that likely significant effects could not be excluded for a number of pathways, including recreational pressure, urbanisation, air quality, water quality and functionally linked land, with particular implications for Stodmarsh, the Thanet Coast sites, The Swale, Tankerton Slopes and Swalecliffe SAC and the Blean Complex SAC. This reinforces CPRE Kent's wider concern that the soundness and legal compliance of the plan depends heavily on mitigation being certain, funded, deliverable, legally secured and effective at the point it is relied upon. This is especially important in relation to Stodmarsh. The HRA relies on the wastewater treatment upgrade regime, the draft Nutrient Mitigation Strategy, on site wastewater treatment for some strategic allocations, SuDS, Stour Environmental Credits and private mitigation credits to conclude that nutrient neutrality is achievable. It also acknowledges some uncertainty over the deliverability of measures in the draft Nutrient Mitigation Strategy and the final nutrient load associated with additional dwellings. CPRE Kent therefore considers that any main modifications should ensure that no development dependent on nutrient, wastewater, recreational pressure or functionally linked land mitigation proceeds unless that mitigation is demonstrably secured and operational in time, with clear monitoring and review mechanisms. Otherwise, the plan risks relying on future mitigation assumptions to justify growth now.

Sustainability Appraisal of the draft Local Plan

Sustainability Appraisal of the draft Local Plan	CPRE Kent Comments
Do you have any comments on the Regulation 19 draft Local Plan Sustainability Appraisal Report? To help us process your comments effectively please reference which section of the Sustainability Appraisal you are commenting about. Please provide any evidence you have to support your comments.	CPRE Kent notes the Sustainability Appraisal and accepts that it has been prepared through an iterative process alongside the Local Plan. However, the SA itself reinforces our central soundness concern. It identifies significant positive effects from meeting housing and economic need, but also records likely significant adverse effects associated with the preferred strategy, including in relation to climate change, biodiversity, landscape, land use, transport and the historic environment. It also recognises that the site allocations will result in the loss of a substantial area of greenfield land, including land classified as Grade 1, 2 or 3 agricultural land, with potential significant negative effects on land use. In CPRE Kent's view, this should have led the Council to test and pursue a more ambitious brownfield and regeneration led alternative before confirming further major greenfield release. Our concern is therefore not simply that the SA identifies harm. It is that the plan has not adequately responded to that harm. The SA framework itself includes objectives to encourage the efficient use of previously developed land and to avoid the unnecessary loss of Best and Most Versatile agricultural land, while national policy expects significant adverse effects to be avoided and, wherever possible, alternatives which reduce or eliminate those effects to be pursued. Yet key regeneration opportunity areas in Canterbury, Wincheap and Herne Bay remain to be worked up later, rather than quantified and tested now as part of the reasonable alternatives. The SA therefore supports our wider conclusion that the plan is not yet justified.