



The district vision by 2040

X Neutral

Please note: these comments are submitted on behalf of CPRE Kent and the CPRE Canterbury district committee.

CPRE, the countryside charity was formed in 1926. It is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches with over 1,450 individual members of which 173 are parish councils, local amenity groups and civic societies.

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

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

We are concerned that the vision is seeking to implement outdated 20th century solutions to a different 21st century set of circumstances. The opportunity should be taken to review the effectiveness of the existing adopted local plan in meeting its vision and objectives (and learn from this) and consider the implications of a post-pandemic world.

CPRE Kent welcomes the Council's vision for a strong and resilient economy. However, it's not clear what business sectors the district's connection to London would appeal to. Is it envisaged that jobs will move to the district; that people currently working in London will move to the area; or that those living in London will commute into the district for work? Is the vision of the plan that it will be building communities – or providing homes for commuters? Has consideration been given to how will this affect existing residents and their ability to afford homes in the district?

Likewise, connectivity to the continent is not fully explained. Does this apply solely to passing movements in connection with cross-channel logistics/deliveries, or wider opportunities?

Will Brexit and the loss of the Erasmus programme coupled with the potential for 'virtual' learning reduce student numbers on campus? And if so, will this impact on the vision for skilled jobs with a diminished symbiotic relationship between the universities/start-ups and local expertise? And in turn will this impact on the local economy and services, with fewer students working in hospitality/retail; or spending in pubs and clubs?

With regard to student numbers studying on campus, if this reduces how will this affect housing need, and if students require better serviced accommodation with, for example, adjacent or included gym facilities how will this affect student demand for existing housing in the city and the wider district?

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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It should be noted that the issue of student numbers on housing need has been reviewed by the UK Statistics Authority (the regulator of the Office of National Statistics – ONS). The Regulator concluded that the current standard methodology creates forecasts were “inconsistent with, and potentially higher than, local evidence suggests” after concerns emerged that the figures had not factored in departing students. The full report is available here (May 2021):

<https://www.cprewarwickshire.org.uk/resources/ukxa-full-report-on-ons-population-estimates-and-projections-for-coventry/>

We would therefore urge the Council to ensure that the potential for such inconsistencies arising from Canterbury’s large student population have been robustly accounted for in the submission version of the Council’s local plan.

Canterbury City is a UNESCO city and it will be important that new development by virtue of location and design does not have an adverse impact on the city’s setting. There is no reference in the vision to protecting and enhancing the city’s setting (and views of the Cathedral from the rural hinterlands).

There needs to be a balance between growth and investment at Canterbury and the historic and natural environment. This will only happen if jobs are close to where people live and are suitable for the employment sectors they are trained in - or are able to be re-trained for - and provide suitable remuneration.

As well as planning for healthy communities through active travel and public transport good diet is important, as well as having time to participate in healthy activities. This element of the vision should refer to the provision of allotments on new developments, for instance, and inclusion of initiatives such as Incredible Edible in new developments.

More home working has the potential to adversely impact on the health of the community with regard to loneliness, isolation and depression (being inactive/having little human contact) – this could be addressed by provision of shared workspace hubs in new developments. Conversely, changed working habits for commuters will give the opportunity for increased spending locally and bring with it benefits in terms of improved wellbeing/reduced stress.

There is no reference to active travel as part of improved connectivity, or to good public transport between villages. Does “good access to local community facilities” mean there will be facilities at each settlement/community, or that there will be good active travel and public transport links to them from further afield? Similarly, will all existing communities be enhanced, or just those at the top of the settlement hierarchy?

On this note the Department for Transport has published a technical guidance (April 2017) on cycling and walking infrastructure plans

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908535/cycling-walking-infrastructure-technical-guidance-document.pdf

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

If the Council hasn’t already done so, an LCWIP should form part of its evidence base.

It would appear that the scale of new housing (in the preferred option) is based on the need to fund a road-building programme. Setting aside the issue of sustainability and climate change in respect of new road building – see CPRE report <https://www.cpre.org.uk/resources/the-end-of-the-road-challenging-the-road-building-consensus/> - it is vital to understand how this will affect the ability of new development to fund other social and community infrastructure, such as affordable housing? As the Council is already aware, no affordable housing provision has been made on the relevant Sturry relief road sites.

CPRE Kent objects to the principle of the proposed new road building in the district and questions what the source of traffic congestion is in the city. Is it as a result of through traffic, or people heading into Canterbury for work, leisure and education? If it's the latter, building new roads to bypass the town centre won't address the issue of city centre congestion - as the Council itself concluded in the adoption of the current local plan.

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

We note with interest that the Sturry Road P&R is closed from 16 July – 20 September due to lack of demand – a reflection of the impact of the pandemic and the move to established working from home practices. Post-Covid, home working is likely to continue, meaning reduced traffic entering the city.

This raises the question of whether current/on-going levels of congestion in Canterbury warrant a new road building programme.

The traffic implications of living with Covid is further evidenced in the Air Quality Action Plan Monitoring Report presented to the Council's Policy Committee on 5 July 2020. This confirms that "levels of NO₂ across the district reduced due to the large reductions in traffic associated with the lockdown restrictions. There were no diffusion tube monitoring locations within the Canterbury or Herne AQMAs in 2020 which exceeded the annual mean NO₂ Air Quality Strategy objective."

Again, this raises the question of whether additional road building is the right solution to the right problem.

Turning to the issue of how affordability of homes will be improved, is the Council relying solely on the affordability factor in the standard methodology, or some other means? It is noted that the Council intends to sell its Military Road premises for residential development – as such, will the Council be leading by example and building truly affordable homes (on the whole site) on this and other sites within its portfolio?

The Council should press for development land to be sold at agricultural land values, in accordance with garden city principles – in order that the uplift in land values could be captured to fund affordable housing (and other infrastructure).

It is noted that no mention is made in the vision to dark skies, tranquillity and best and most versatile agricultural land.

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

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

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

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

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

Given the above we are concerned that the vision is using an outdated 20th century solution to a different 21st century set of circumstances.

Our strategic objectives

Provide high quality affordable housing for everyone as part of mixed, sustainable communities

X Agree

Make sure housing is of high quality design, low carbon and energy efficient, with access to community facilities and open space

X Strongly agree

Create a thriving economy with a wide range of jobs, including more high paid jobs, to support increased opportunities for everyone

X Agree

Support the growth and development of our universities as a centre of innovation and learning excellence, which will help create business start ups and skilled jobs

X Agree

Create a transport network with focus on low carbon travel to improve air quality and people's health, make sure there's excellent access to city and town centres, including through intelligent transport systems

X Agree

Take advantage of, and improve, our links to and from London and the continent, while creating a local transport network which means most residents can access their day-to-day needs within 15 minutes through healthy, environmentally friendly journeys

X Agree

Support the sustainable growth of our rural communities with affordable housing, community facilities and transport, and take advantage of opportunities to grow the rural economy

X Agree

Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses

X Agree

Exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses, and ensure the critical infrastructure is delivered at the right time to support development

X Agree

Create accessible vibrant town centres, maximising digital connectivity, for residents, visitors and businesses to shop, stay and enjoy their leisure time

Select an option:

X Agree

Protect and enhance our rich environment, creating spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities

X Strongly agree

Adapt to and reduce the impacts of climate change by making sure new development is highly energy efficient and encourages low carbon lifestyles

X Strongly agree

Are there any comments you want to make about the draft objectives?

See comments from CPRE Kent on the Council's vision.

We agree that high quality affordable housing should be available for everyone, as long as this isn't dependent on higher housing numbers. Likewise, high quality design – that speaks to the local environment and isn't part of a developer 'build everywhere' package is vital in terms of locational distinctiveness and placemaking, but this mustn't result in more expensive housing. The need for high quality design should be factored in at the plan making stage – and reflected in lower land purchase costs.

The objective of a thriving economy is welcomed, but how can the promise of high paid jobs be delivered? As well as these desirable high paid jobs there will continue to be a need for the vital jobs undertaken by our keyworkers (which are often lower paid) such as cleaners, hospitality and retail staff. What housing provision will be available for those who cannot afford private house prices or private rent?

In principle supporting the universities is welcomed. But post-Covid will these be the same institutions we recognise today? If remote learning continues the same symbiotic relationships won't be forthcoming. Is there evidence that the universities, as centres of excellence, have been directly responsible for start-ups and skilled jobs, and if so, how significant is this?

A low carbon transport system is to be welcomed. The aim of this objective can be strongly influenced by the Council's development strategy, by the location of new development and its ability to promote/encourage active transport. Provision of new roads (with the associated uplift in homes and infrastructure needed to support them) appears at odds with this climate change objective. A road building programme cannot sit comfortably with a Council that's declared a climate change emergency (July 2019) – it's not enough to rely solely on the replacement of ICE vehicles with EV. Taking this 'do nothing' approach will not tackle congestion or travel times. A greater commitment should be given to making active travel and public transport an attractive alternative.

It's not clear what is meant about improving linkages to and from London and the continent. Does this relate to road or rail links, or both? To what extent are improvements to the strategic road network (including beyond the district boundaries, at Brenley Corner and the Lower Thames Crossing, for instance) being considered?

In respect of rail travel is there an expectation of faster/more frequent services – has the feasibility of this been explored with the Network Rail and the rail service providers?

What is the Council's definition of a 15-minute community? Is it a 15-minute drive, walk or cycle ride – and how does this timeframe equate to distance to be travelled?

We support the sustainable growth of rural communities with affordable housing, community facilities and transport. However, this must not be at the expense of the character of the rural settlements and their landscape setting – particularly in terms of the AONB and AHLV and views to and from Canterbury Cathedral and the historic pilgrim’s routes to it. Placemaking should be key.

Such growth should be sustainably located and focused on the needs of residents. Development that has no specific requirement to be located in the rural area and which would additionally have an adverse impact on rural lanes should not be encouraged.

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

In this respect it’s not clear whether the road building programme in the preferred option is going to amount to estate roads giving an alternative ‘rat run’ route to avoid the centre of Canterbury, or whether a full relief road is being proposed as a way of addressing congestion and air pollution as people travel into and out of the city. The indicative routes shown in the consultation don’t appear to address this particular concern. In any event, congestion and air pollution concerns seem to have been addressed by changes in working patterns during the pandemic and may well continue.

Digital connectivity should not be restricted to town centres. It should apply to the whole district, facilitating working from home (and planning trips by public transport), with the knock-on effect of reduce congestion and air pollution on the roads.

Growth options

The preferred option

How much do you agree or disagree with the preferred option?

X Strongly disagree

Other options

Canterbury focus A

How much do you agree or disagree with Canterbury focus A?

X Agree

Canterbury focus B

How much do you agree or disagree with Canterbury focus B?

X Disagree

Coastal focus

How much do you agree or disagree with the coastal focus option?

X Agree

Rural focus

How much do you agree or disagree with the rural focus option?

X Agree

New freestanding settlement

How much do you agree or disagree with the new freestanding settlement option?

X Strongly disagree

Are there any other growth options we should consider?

X Yes

It is noted that the printable version of the local plan consultation documents made available to CPRE Kent by the Council does not allow comments to be made on the merits of the each of the growth options put forward – this is at odds with the online portal submission form which prompts the respondent to “tell us why you agree or disagree: is there anything we could do to improve this option” – if the online and hard copy version of the consultation differ this raises a concerning consultation process issue. Unfortunately, there appears to be a fault with the online portal, meaning that comments aren’t registered and the user is ‘kicked out’ of the system.

The Council’s preferred option:

CPRE Kent doesn’t support the preferred option. A careful balance needs to be struck between taking economic advantage of Canterbury’s heritage and undermining it with too much, and inappropriately sited development.

Building up to 8,000 more dwellings than required to fund a road building programme will place undue burden on local communities, the countryside setting of Canterbury, the AONB and AHLV. It will place a tremendous burden on local roads that are at or near capacity – has modelling been undertaken with respect to: St Stephen’s roundabout, Broad Oak Road, St Dunstan’s Street?

While CPRE Kent is mindful of the constraints with respect to the standard methodology, we would remind the Council that it is only the starting point for local authorities in identifying the housing need in a local area. This was recently confirmed by MHCLG: “the numbers mentioned are a starting point for local councils to help them understand how much housing is needed in their area and are not legally binding. Put simply, it is a measure of an area’s housing need, against which councils must then consider their local circumstances and supply pipeline.

Councils draw up a local housing target, taking into account factors including land availability and environmental constraints.” (see MCHLG blog 25 May 2021 - <https://mhclgmedia.blog.gov.uk/2021/05/25/response-to-the-times-front-page-on-housing-building-target-analysis-by-the-campaign-to-protect-rural-england/>)

Specifically, the Council should be aware of CPRE Warwickshire’s successful challenge to the Coventry Local Plan with respect to ONS forecasts which underpin the standard methodology. The Office for Statistics Regulation (OSR) has stated that current methodology creates forecasts which are “inconsistent with, and potentially higher than, local evidence suggests” after concerns emerged that the figures have not factored in departing students. (See <https://www.cprewarwickshire.org.uk/resources/uksa-full-report-on-ons-population-estimates-and-projections-for-coventry/>)

We would therefore urge the Council to ensure that the potential for such inconsistencies arising from Canterbury’s large student population have been robustly accounted for and eliminated within the emerging plan.

In addition, we are concerned that the Council’s preferred option would have an adverse impact on dark skies, tranquillity and best and most versatile agricultural land.

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

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

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

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

The preferred option is summarised as including an upgrade to the A28. No mention is made of the two new roads (shown on the indicative key diagram). It is not clear what the purpose is of these new roads – they seemingly allow some sections of the city to be by-passed. What is the evidence that these routes are needed?

Concerns about traffic congestion/pollution within the city and along the ring road – arising from traffic daily entering the city for work, leisure or education - should be tackled in a different way. Initiatives such as P&R, Arriva click (on demand bus services) and facilitating active travel and public transport routes into and around the city centre should be explored.

CPRE Kent queries whether or not the preferred option includes a new secondary school on the coast, a reservoir at Broad Oak or new hospital facilities at Canterbury – they aren't referred to the option summary, although they are shown on the smaller scale plan of the whole district.

Canterbury focus A:

CPRE Kent supports the Canterbury focus A option for 9,000 dwellings and no new road building. It does not support Canterbury focus B for 14,000 homes and two new roads. Again, these are described as upgrades to the A28, which is misleading because the associated diagram shows a link between the A2 and A290 (north of the A28) and a link between the A28 at Sturry and the A2050/A2 at Bridge.

Canterbury focus B:

CPRE Kent doesn't support the Canterbury focus B. A careful balance needs to be struck between taking economic advantage of Canterbury's heritage and undermining it with too much, and inappropriately sited development.

Building up to 8,000 more dwellings than required to fund a road building programme will place undue burden on local communities, the countryside setting of Canterbury, the AONB and AHLV. It will place a tremendous burden on local roads that are at our near capacity – has modelling been undertaken with respect to: St Stephen's roundabout, Broad Oak Road, St Dunstan's Street?

Whilst CPRE Kent is mindful of the constraints with respect to the standard methodology, we would remind the Council that it is only the starting point for local authorities in identifying the housing need in a local area. This was recently confirmed by MHCLG: "the numbers mentioned are a starting point for local councils to help them understand how much housing is needed in their area and are not legally binding. Put simply, it is a measure of an area's housing need, against which councils must then consider their local circumstances and supply pipeline. Councils draw up a local housing target, taking into account factors including land availability and environmental constraints." (see MCHLG blog 25 May 2021 -

<https://mhclgmedia.blog.gov.uk/2021/05/25/response-to-the-times-front-page-on-housing-building-target-analysis-by-the-campaign-to-protect-rural-england/>)

Specifically, the Council should be aware of CPRE Warwickshire's successful challenge to the Coventry Local Plan with respect to ONS forecasts which underpin the standard methodology. The Office for Statistics Regulation (OSR) has stated that current methodology creates forecasts which are "inconsistent with, and potentially higher than, local evidence suggests" after concerns emerged that the figures have not factored in departing students. (See <https://www.cprewarwickshire.org.uk/resources/uksa-full-report-on-ons-population-estimates-and-projections-for-coventry/>)

We would therefore urge the Council to ensure that the potential for an such inconsistencies arising from Canterbury's large student population have been robustly accounted for and eliminated within the forthcoming submission plan.

In addition, we are concerned that the Council's preferred option would have an adverse impact on dark skies, tranquillity and best and most versatile agricultural land.

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

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

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

This option is summarised as including an upgrade to the A28. No mention is made of the two new roads (shown on the indicative key diagram). It is not clear what the purpose is of these new roads – they seemingly allow some sections of the city to be by-passed. What is the evidence that these routes are needed?

Concerns about traffic congestion/pollution within the city and along the ring road – arising from traffic daily entering the city for work, leisure or education - should be tackled in a different way. Initiatives such as P&R, Arriva click (on demand bus services) and facilitating active travel and public transport routes into and around the city centre should be explored.

CPRE Kent queries whether or not this option includes a new secondary school on the coast, a reservoir at Broad Oak or new hospital facilities at Canterbury – they aren't referred to the option summary, although they are shown on the smaller scale plan of the whole district.

Coastal focus:

It's not clear from the consultation what is proposed regarding a link road between the old and new Thanet Way – it's shown on the accompanying diagram, but not referred to in the text.

Rural focus:

A careful balance will need to be struck between ensuring the future sustainability of these communities, whilst not being detrimental to their character and rural settings. Query whether the quantum of development proposed would be sufficient to support a public transport system that is fast, frequent and gets you where you wanted to be (and home again) on time? Without an upfront commitment like this, car usage will become the norm on first occupation of new homes and would be a difficult habit to break. Placemaking will be key.

New freestanding settlement:

CPRE Kent cannot support the idea of a new freestanding development in an unspecified location. Presumably to make it through to options stage sufficient evidence will have been gathered through the call for sites/SHLAA process to establish whether this is a credible option. Until such time as this is clarified, the option of a freestanding settlement should not be considered.

Town centre strategies

Canterbury city centre vision & objectives

Do you agree with our vision and objectives for Canterbury city centre?

X No

Do you have any different suggestions?

See CPRE Kent comments made under the district vision and objectives.

The draft city centre vision states in the first paragraph that: “The vision for Canterbury is to build its success as the key visitor and shopping destination in Kent ...” And in the second paragraph that: “Canterbury will experience significantly-reduced traffic congestion through a switch towards active travel ...”

It is not clear how the city will square these two aspects of the vision. To be a key Kent destination means that people will have to travel to Canterbury from outside the district be that by car, train or bus/coach. These are not modes of active travel. Will there be park and ride provision on all major routes into the city centre?

While CPRE Kent welcomes the principle of the vision and objectives for Canterbury city centre it is concerned that the proposed “significant reduction in traffic congestion and the decisive switch to active travel” will only be brought about by a new road building programme.

As we have set out before – and evidenced in the CPRE report <https://www.cpre.org.uk/resources/the-end-of-the-road-challenging-the-road-building-consensus/> - it is clear that road building will just result in more traffic.

Reduced traffic congestion should be addressed via the Council's development strategy in terms of its strategic allocations and the co-location of jobs and homes; and the recognition that post-Covid working patterns look set to change.

Rather than seeking to maintain the city's function it should look at diversifying its range of town centre uses in order to retain its status as a sub-regional centre. Increased online sales is already having an impact on the high street – and looks set to continue (with the need for more and larger warehousing facilities).

With more people able to work from home this raises the question of what will happen to city centre office space and whether this should be repurposed for shared work hubs and residential development – therefore releasing the pressure for development on green field sites. In addition, with fewer people working in and around the city centre what impact will this have on businesses that support office workers, such as: cafes, hair salons, dry cleaners and so on – and the need for new road building?

Similarly, will supporting the growth and development of the universities actually stimulate business start-ups and associated economic development? How much learning will continue online? Will the physical university premises actually be the flash point for developing symbiotic relationships?

Making effective use of land will mean increasing densities, in order to reduce green field land take.

The National Design Codes consultation (January 2021) states that density is an essential component of an effective design code. Building at 20-40dph is noted as representing development in outer suburbs; suburban development is pegged at 40-60dph and urban neighbourhoods at 50-120dph. Further research undertaken by CPRE and Place Alliance (A housing design audit for England, 2020) https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England_2020.pdf concludes that housing schemes performed more poorly with distance from the urban core and with reduced density. The additional constraints imposed by stronger pre-existing urban context, were considered to encourage a more sensitive design response. Building at low density and on green fields is not being done well in terms of design quality. The most successful schemes (as audited in the study of 142 developments) were those at 56dph – which is almost double the national average of 31dph.

Making the most of the city's heritage to deliver economic, social and environmental benefits is a laudable objective. However, a careful balance will need to be struck between economic and social benefit and the impact on the environment. Canterbury has three world UNESCO sites – their settings and views into and out of these sites along with the rural hinterland of the city should be protected.

Housing and new communities

Meeting housing needs

Issue HNC1. How should we make sure the right types and tenures of housing are provided?

How should we make sure the right types and tenures of housing are provided?

X Option HNC1C - (preferred option) - set specific housing mix targets which each site must deliver and identify opportunity sites for specific types or tenures

Tell us why you chose this option (types of housing):

Will guidance on housing mix be provided for windfall, as well as allocated sites?

Issue HNC2. How should we provide opportunities for small and medium sized housing developments?

How should we approach providing opportunities for small and medium sized housing developments?

X Option HNC2C (preferred option) - maximise opportunities for delivery of small and medium sites to deliver new homes

if you think there's a better option for small and medium housing developments, let us know:

As windfall sites are by their nature unplanned/unallocated sites, they won't always be in suitable, sustainable locations and may not help the Council achieve its vision or objectives. Continuing the current approach (option HNC2A) isn't proactive.

In terms of the Council's preferred option (HNC2C) the implications of sub-dividing large sites for SMEs needs to be carefully assessed, particularly in respect of the provision of affordable housing and funding necessary infrastructure (where small sites may fall below threshold requirements).

Viability work needs to be undertaken at local plan stage to ensure that affordable housing can be provided at the required levels – including in connection with student accommodation.

Issue HNC3. How should we provide opportunities for suitable brownfield and regeneration developments?

How should we provide opportunities for suitable brownfield and regeneration developments?

X Option HNC3B (preferred option) - maximise opportunities for delivery of suitable brownfield and regeneration developments

Tell us why you chose this option (brownfield and regeneration):

Any policy approach should safeguard brownfield land that supports important species which can only thrive in certain conditions.

Query whether the 43 sites on the Brownfield Register been allocated/developed – and their status in relation to the SHLAA.

Issue HNC4. How should we make sure that the right densities are delivered in developments across the district?

How should we make sure that the right densities are delivered in developments across the district?

X Option HNC4C (preferred option) - set specific densities, or a range of densities, for areas of the district to make best use of the land. Site allocation densities would be influenced by the local distinctiveness and character so that housing fits in with surroundings

Tell us why you chose this option (housing densities):

CPRE Kent supports higher densities in locations well supported by/or can be well supported by active travel, social and community facilities.

Whilst consideration will need to be given to densities in villages. It needs to be remembered that post-war many developments on the edge of villages have been built at low densities (35 dwellings per hectare and less) which is not conducive to sustainable travel or minimising loss of green field land, whilst the historic core of villages can be at much higher densities.

Research undertaken by CPRE and Place Alliance (A housing design audit for England, 2020) https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England_2020.pdf concludes that housing schemes performed more poorly with distance from the urban core and with reduced density. The additional constraints imposed by stronger pre-existing urban context, were considered to encourage a more sensitive design response. Building at low

density and on green fields is not being done well in terms of design quality. The most successful schemes (as audited in the study of 142 developments) were those at 56dph – which is almost double the national average of 31dph.

The National Design Codes consultation (January 2021) states that density is an essential component of an effective design code. Building at 20-40dph is noted as representing development in outer suburbs; suburban development is pegged at 40-60dph and urban neighbourhoods at 50-120dph. Increased densities should not be at the expense of placemaking and local distinctives. It would be helpful if design guidance was provided within the local plan demonstrating what would and would not be acceptable – using examples from the area that have been successful (and not successful).

Issue HNC5. How should we make sure housing is provided for rural communities?

How should we make sure housing is provided for rural communities?

X Option HNC5C (preferred option) - support housing developments, at and adjacent to, rural services centres, local centres and villages where this provides affordable housing

Tell us why you chose this option (rural housing):

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

It is noted that allocations will need to be for 11+ dwellings to ensure that affordable housing provision is made.

As previously set out, placemaking and local distinctiveness will be key.

Community infrastructure and design

Issue HNC6. How can we support sustainable living in new communities?

How can we support sustainable living in new communities?

X Option HNC6C - (preferred option) set clear requirements for new or improved social and community infrastructure to be delivered as part of strategic developments, and large developments must show that essential services can be accessed within 15 minutes walking or cycling time

Tell us why you chose this option (sustainable living):

Need to ensure that there is sufficient capacity within existing centres or within 15 minutes walking or cycling time. Where this does not exist, new social and community infrastructure should be provided early on to encourage sustainable lifestyle choices – this could be by using temporary accommodation/portakabins for local shops and GP surgeries.

Issue HNC7. How should we make sure all design is of high quality?

How should we make sure all design is of high quality?

X Option HNC7C (preferred option) - embed master plans and design requirements for strategic development sites within the Local Plan, and continue current design criteria based approach for other sites and types of development; setting out when specific design tools like design codes should be used

Tell us why you chose this option (design quality):

Before drafting new design policies it will be imperative that the Council assesses the effectiveness of its current design policies and adapts them as necessary to ensure that future developments are actually of high quality, locally distinct and serve their purpose well in placemaking.

The local plan should include illustrations clearly seeing out what will be acceptable and what won't be.

Issue HNC8. How can we deliver low carbon and energy efficient housing?

How should we do this for new homes?

X Option HNC8C - (preferred option) all new homes delivered to net zero

Tell us why you chose this option (low carbon new homes):

A policy is needed to require new build to meet energy efficiency standards higher than current government requirement to ensure that solar panels are provided in new developments (residential and commercial) or that solar panels have to be part of new build energy efficiency requirements – in this way increased demand for power (electric vehicles) will be met.

How should we do this for refurbishments and changes to existing homes?

How should we do this for refurbishments and changes to existing homes?

X Option HNC8E – apply the requirement to meet Building Regulations Part L energy standards to changes to buildings to all but the smallest extensions, and require planning applications to have an energy plan for improvements to energy performance

Improving water efficiency

Issue HNC8. How should we improve water efficiency?

How should we improve water efficiency?

X Option HNC8H - require proposals for new homes to show the higher water efficiency standard of 110 litres per person per day

Tell us why you chose this option:

It would appear that extensions to existing homes could be subject to improving energy performance (HNC8D/E), but not water efficiency.

Accepting a lower housing number would help reduce water demand.

Incorporating renewable energy into new developments

Issue HNC8. How will we incorporate renewable energy into new developments?

How will we incorporate renewable energy into new developments?

X Option HNC8J - keep the current approach to reducing carbon emissions associated with energy from new developments

Tell us why you chose this option:

Query whether decentralised energy supply a realistic proposition – are there any examples of where this has been successful locally?

Specialist housing need

Issue HNC9. How should we provide housing for older people?

How should we approach providing housing for older people?

X Option HNC9C (preferred option) - provide a blended approach with a proportion of the site being delivered through large or strategic sites and allocated specific sites

Tell us why you chose this option (housing for older people):

Each option relates to provision of specialist housing for the elderly on large/strategic sites. This raises the issue of whether such provision would meet the needs of older person accommodation in the district's villages?

Do these options relate to provision of individual homes, or are they referring to old people's (care) homes and retirement villages? In the case of retirement villages, these would be best located in urban areas with a range of services and facilities suitable for older people.

In any event the older generation should be able to downsize and live within mixed communities so they can continue to build and rely on social connections, and not be socially isolated.

Issue HNC10. How should we provide accessible and disability-friendly homes?

How should we approach providing accessible and disability-friendly homes?

x Option HNC10C (preferred option) - require around 15% of new properties to be built to M4 (2) standards, and around 5% to be built to M4 (3) standards on major developments and strategic sites, to better reflect the needs

Tell us why you chose this option (disability friendly homes):

In the section marked 'What is the issue and why is it important?' it says: "It is important to make sure that full access is integrated into all design features, rather than being seen as an add-on or just for disabled people."

If this is so, policy should achieve this for all – for the elderly, the disabled and for those for whom life includes needing to be able to store pushchairs/prams and bikes.

Issue HNC11. How and where should we provide new student accommodation?

How and where should we provide opportunities for new student accommodation?

X Option HNC11B - provide purpose built student accommodation only on or near campus, for example within a 5-10 minute walk of the campus

Tell us why you chose this option (student housing):

In the section 'What is the issue and why is it important?' it states: "Although some students will live at home with their families, most will meet their accommodation needs through purpose built accommodation or shared houses".

The evidence is telling the Council that the "district has one of the highest ratios of students to permanent residents in England, at 16.4%, compared to a national average of 6%". How does this compare to say, Cambridge or Oxford?

It's not clear how the need for 8850 new homes relates to the 24,300 full-time students - how many live in the district, in halls of residence or HMOs?

Query how would requiring student accommodation near to be on/near campus impact on the city centre objective to "Facilitate business growth and development in the city by supporting the growth and development of the universities to stimulate business startups and associated economic development"?

See previous comments about potential changes to the universities model post-pandemic.

Issue HNC12. How should we provide accommodation for gypsies and travellers?

How should we provide accommodation for gypsies and travellers?

- Option HNC12A - keep current approach to meeting gypsy and traveller housing needs
- Option HNC12B - allocate new pitches (either as new sites or extensions to existing sites) to meet gypsy and traveller housing needs
- Option HNC12C (preferred option) - keep current approach and take opportunities through the Local Plan to allocate new pitches where suitable sites are identified

Issue HNC13. How should we support opportunities for self and custom-build housing?

How should we provide opportunities for self and custom-build housing?

X Option HNC13C (preferred option) - provide a blended approach with a proportion of plots being delivered through large or strategic sites, and allocated specific small sites

Delivering infrastructure to support growth

Issue HNC14. How can we maximise the benefits of strategic infrastructure investment for residents and businesses?

How can we maximise the benefits of strategic infrastructure investment for residents and businesses?

X Option HNC14B - provide overarching general support for strategic infrastructure projects which are needed to support growth

Tell us why you chose this option (strategic infrastructure):

Query whether the Council's preferred growth option supports only the two proposed new roads – or whether that quantum of development is needed to bring forward plans for the hospital and Broad Oak reservoir.

Issue HNC15. How can we enhance the production of community and utility scale renewable energy?

How can we enhance the production of community and utility scale renewable energy?

X Option HNC15B - (preferred option) actively support renewable or low carbon energy by removing the requirement for applicants to show need, and consider opportunities to map areas for prioritising community and utility scale renewable energy projects

Tell us why you chose this option (renewable energy):

Sites for solar power generation should avoid best and most versatile agricultural land.

A policy is needed to require new build to meet energy efficiency standards higher than current government requirements to ensure that solar panels are provided in new developments (residential

and commercial) or that solar panels have to be part of new build energy efficiency requirements – in this way increased demand for power (electric vehicles) will be met.

Issue HNC16. How can we make sure that infrastructure is delivered at the right time to support development?

How can we make sure that infrastructure is delivered at the right time to support development?

X Option HNC16C (preferred option) - set clear requirements for necessary infrastructure to be provided at the right time and explore opportunities to deliver critical infrastructure ahead of development

Tell us why you chose this option (infrastructure right time):

A further issue to be considered is where infrastructure costs are spread over a number of developments. For example, land is yet to be safeguarded for the proposed fast bus lane route from Mountfield Park to the city centre. It lies within a number of ownerships and its delivery will depend on all sites coming forward within a similar time frame.

There may be a need for the council/KCC to consider how to establish a pump priming fund to bring forward necessary infrastructure and then charge landowners/developers when individual schemes are brought forward.

Issue HNC17. How should we address changes in development viability at the planning application stage?

How should we address changes in development viability at the planning application stage?

X Option HNC17C (preferred option) - set clear and limited criteria where new viability evidence is accepted at planning application stage

Tell us why you chose this option (development viability changes):

It will be important that policy is drafted to ensure that if new evidence shows that a development is more profitable at application stage that the Council will seek enhanced contributions.

Employment and the local economy

Issue EMP1 - Provide enough business space in the right locations

How should we ensure that enough business space is provided in the right locations to support growth? *

X Option EMP1C (preferred option) - Retain the most deliverable sites from the current economic strategy and land allocations, consider mixed use development opportunities at other existing sites and potential for alternative sites more aligned to market needs; provide more flexibility for existing employment areas to grow and intensify

*Tell us why you chose this option **

Need to be sure that where employment sites are reallocated that they are identified for appropriate alternative uses, in terms of transport, accessibility, suitability for adjoining uses and so on.

Also, need to identify suitable alternative sites that will not become surplus in the future, and again, need to be brought forward for alternative uses.

Issue EMP2 - Provide the right mix of jobs

How can we provide opportunities for the right mix of jobs, including higher paid jobs, to be created? *

X Option EMP2C (preferred option) - Provide a blended approach with specific opportunity sites identified for higher paid jobs, while enabling significant flexibility on other identified employment sites

Issue EMP3 - Supporting the delivery of allocated employment sites

How can we best support the delivery of allocated employment sites? *

X Option EMP3C (preferred option) - Secure serviced employment land and a delivery strategy as part of strategic development sites and consider opportunities for enabling development and CCC support where employment allocations are not being delivered

*Tell us why you chose this option **

Where enabling development is proposed the type of non-employment development should be compatible with the proposed employment uses in terms hours of operation, noise, smells and so on.

Issue EMP4: Improving the accessibility and connectivity of employment areas

How can we improve the accessibility and connectivity of employment areas? *

X Option EMP4C (preferred option) - Require all new employment developments to provide full fibre connections and be accessible by sustainable transport, and ensure that all strategic development sites (e.g. over 300 homes) incorporate some commercial development to reduce the need to travel

*Tell us why you chose this option **

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

High-speed broadband provision will be important for residential areas as well as employment areas as more people work wholly from home or part-time from home.

Issue EMP5: Improving the energy performance and carbon emissions of new commercial developments

How can we improve the energy performance and carbon emissions of new commercial developments in the district? *

X Option EMP5D: (preferred option) Net zero now. Specify that all new commercial buildings or change of use to commercial must be designed to meet an A+ Energy Performance Certificate using the Standard Assessment Procedure

Issue EMP6 - Supporting the development of our universities

How should we support the development of our universities? *

X Option EMP6A - Continue with current approach to university development

- Option EMP6B (preferred option) - Align the Local Plan with the growth plans of the universities

Tell us why you chose this option

Aligning the local plan with the growth plans of the universities places the Council at risk in terms of future-proofing. A brief history of the county shows what happens when a dominant sector declines or closes – such as Chatham Naval Dockyard in the 1980s or Pfizer at Sandwich.

Issue EMP7: Supporting new tourist accommodation

How can we support the delivery of new, high quality tourist accommodation to boost overnight stays and support the local economy?

- X Option EMP7A** - Focus tourist accommodation within or on the edge of the town and city centres

Tell us why you chose this option

Tourist accommodation in the rural area could result in increased vehicular traffic on local roads, whether or not the area has good public transport.

Accommodation, whether located at the edge of town or in rural areas should be sustainably located - as if it were conventional residential development. We are concerned that ‘specific opportunity sites’ will be remote and unsustainably located. New tourist accommodation should be supporting existing rural communities and not be isolated developments.

We also note that airbnb can result in both loss of residential accommodation and issues for neighbours.

Issue EMP8: Supporting growth of the rural economy

How should we support the growth and development of the rural economy?

- X Option EMP8A** - Continue the current approach to focus new rural employment development within existing employment sites

Tell us why you chose this option

It is important that the AONB is safeguarded, and that any new employment requires a rural location rather than a cheap building; and is accessible by active travel and public transport that relates to business hours of operation.

If, for example, an operation is of an industrial nature (including winemaking) can it be undertaken on an industrial/employment estate that is better located to the urban area and workforce? It will also be important to take account of the local road network and avoid putting heavy vehicles and excessive traffic (workers/deliveries) on to the rural lanes.

Town centres and local facilities

Issue TCLF1. How should we designate the hierarchy of centres in the district?

How should we designate the hierarchy of centres in the district?

X Option TCLF1B (preferred option) - keep the existing hierarchy of centres

Tell us why you chose this option:

It will be important to have a distribution of suitable sized centres that reduce the need to travel and support sustainable development.

Is the Council satisfied that the existing hierarchy provides a suitable distribution enabling convenient access to services and facilities?

Have these centres, including rural service centres been adversely affected by online sales and deliveries? If they have, what role can these centres reasonably provide for their immediate communities?

It is noted that the Retail and Leisure Study 2020 refers at table 36 refers to South Canterbury, Sturry/Broad Oak, Hillsborough Hern Bay, Herne Bay Golf Course, Strode Farm, and Cockering Farm as Strategic Allocations with a retail element. These are not referred to local plan consultation. Is there a reason for this?

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

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

Issue TCLF2. How should we support appropriate growth and development at out-of-town retail areas in Canterbury?

How should we support appropriate growth and development at out-of-town retail areas in Canterbury?

X Option TCLF2B (preferred option) - provide greater flexibility for a range of uses to come forward in these areas, including residential development, and support expansion where appropriate

Tell us why you chose this option:

The Retail and Leisure Study was published in July 2020. The table in option TCLF2 refers to the need for 6,307sqm convenience floorspace in 2040. Given that many people have used home deliveries by food retailers during lockdown and got used to it, will there be a need for this floorspace or will it more warehouse space be needed instead?

Issue TCLF3. How should we support and protect our local centres?

CPRE Kent does not wish to comment on individual centres.

Issue TCFL4. How can we best support our village centres?

How can we best support our village centres?

X Option TCLF4B - (preferred option) designate village centres to protect and improve the existing provision of services and facilities within the rural settlements

Tell us why you chose this option:

It's not clear whether the preferred option (TCLF4B) seeks to protect existing use only or future community uses as well.

Movement and transport

Issue MT1. How can we maximise active travel in the district?

How can we maximise active travel?

X Option MT1B - all new developments must show how they will maximise opportunities for walking and cycling

If you think there's a better option, let us know:

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

Issue MT2. How do we enable greater use of public transport in the district?

How should we do this for road travel?

X Option MT2B - all major developments must show how they will maximise access to the existing local bus network

Tell us why you chose this option (road travel):

An important factor will be the locational distribution of new development to encourage increased use. People may only be encouraged back onto buses where there are regular services that meets people's travel needs (morning, noon and night) and it is not perceived an inferior option. A quality service must be provided.

How should we do this for train travel?

How should we do this for train travel?

X Option MT2D - all major developments must show how they will maximise access to rail services

Issue MT3. How will we enable the rapid transition to zero emissions vehicles?

How will we enable the rapid transition to zero emissions vehicles?

X Option MT3B - accelerated transition to zero emissions vehicles

Tell us why you chose this option:

As well as on-street/car park EV charging points provision should be made for charging at individual residential properties.

Rapid charge points will be needed so vehicles are not parked up for hours on end waiting for batteries to trickle towards full charge.

Issue MT4. How should we approach parking standards in the Local Plan?

How should we approach parking standards in the Local Plan?

X Option MT4C - (preferred option) amend the current parking standards to significantly reduce car parking provision in the most sustainable locations and to allow for enough provision in suburban areas

Tell us why you chose this option:

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

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

Issue MT5. How should we approach transport assessments, transport statements and travel plans?

How should we approach transport assessments, transport statements and travel plans?

X Option MT5B - all major developments must submit transport assessments and travel plans

Heritage and the historic environment

Issue NE1. How can we protect and enhance our heritage assets?

How can we protect and enhance our heritage assets?

X Option NE1B - make changes to the current Local Plan policies

Tell us why you chose this option (protecting assets):

Enforcement needs to be more effective than it currently is.

Issue NE2. How can we support the adaptation of the historic environment to achieve improvements in carbon emissions and energy efficiency?

How can we support the adaptation of the historic environment to achieve improvements in carbon emissions and energy efficiency?

X Option NE2B (preferred option) - support the adaptation and retrofitting of buildings in conservation areas and historic buildings through new guidance

Tell us why you chose this option (energy efficiency):

The council needs to ensure that retro-fitting of insulation in older properties doesn't compromise their appearance and weather resisting properties.

In response to increasing evidence that the retrofit of traditional buildings (and indeed all buildings) over the past few years has not led to the expected reductions in energy use, and has harmed the building fabric, heritage or health of building occupants, the Sustainable Traditional Buildings Alliance (supported by Historic England) has published guidance on planning responsible retrofitting of traditional buildings (2015).

<https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/responsible-retrofit-trad-bldgs/>

In drawing up its own policy the Council should have regard to this guidance.

Protection and enhancement of wildlife and biodiversity

How should we protect and enhance biodiversity and green and blue spaces like parks and rivers?

X Option NE3C (preferred option) - require new developments to enhance existing, or provide new, green spaces to conserve and where possible enhance blue spaces, plus a 20% biodiversity net gain

Protecting and enhancing the character of our valued landscapes

Issue NE4. How should we make sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscapes?

How should we do this for the Stour Valley landscape?

Stour Valley landscape options

X Option NE4L - think about a new Stour Valley Floodplain (east) LLD

- Option NE4M (preferred option) - continue with the current approach to the Stour Valley landscape

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 district 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.

Issue QNE5. How should we make sure our approach to green gaps is still effective?

How should we make sure our approach to green gaps is still effective?

- Option NE5A** - keep the current approach to development acceptable in green gaps

Tell us why you chose this option (green gaps):

Green gaps should prevent different communities from coalescing. The existing gaps appear to have been drawn up as a desktop exercise and have not take account of topography, woodland or shapes of proposed developments. Their width must be such that the edges of the two separate communities don't visually dominate. Green gaps should look like countryside, even if it contains other green field, non agricultural uses.

What should we do with the green gap between Sturry and Westbere?

Sturry and Westbere green gap options

- Option NE5C - keep the existing green gap identified in the current Local Plan
- Option NE5D (preferred option) - keep the green gap with suggested boundary changes to exclude a **building to the east**

Not sure what is meant by "building to the east" – is this a typo?

What should we do with the green gap between Sturry and Hersden?

Sturry and Hersden green gap options

- Option NE5E - keep the existing green gap identified in the current Local Plan
- Option NE5F (preferred option) - keep the green gap with suggested boundary changes around the garage

Not sure what is meant by “changes around the garage”. This gap has been severely compromised by ill-conceived development.

What should we do with the green gap between Sturry and Broad Oak?

Sturry and Broad Oak green gap options

X Option NE5J (preferred option) - keep the existing green gap identified in the current Local Plan

Development has reduced this green gap to a patch of grass. The Council have not allowed tree planting in this location, which would have given the area definition.

What should we do with the green gap between Canterbury and Tyler Hill?

Canterbury and Tyler Hill green gap options

X Option NE5L (preferred option) - keep the existing green gap identified in the current Local Plan

This is a very small, but effective green gap and should not be diminished.

What should we do with the green gap between Canterbury and Sturry?

Canterbury and Sturry green gap options

X Option NE5P (preferred option) - keep the existing green gap identified in the current Local Plan

The green gap in this location was originally about 0.6km wide. It was very effective visually, with the woodland north of the A28 being crucial. Most of this gap was eroded once land was allocated for

development and has been gradually reduced to about 200m, with the relief road and its viaduct adding to the diminution.

What should we do with the green gap between Blean and Rough Common?

Blean and Rough Common green gap options

X Option NE5R (preferred option) - keep the existing green gap identified in the current Local Plan

What should we do about new green gaps?

New green gaps options

X Option NE5S - think about opportunities to identify new green gaps

Any new green gaps required by new developments should take account of topography, woodland or shapes of proposed developments. Their width must be such that the edges of the two separate communities don't visually dominate. Green gaps should look like countryside, even if it contains other green field, no agricultural uses.

Issue NE6. How should we manage outdoor lighting to support tranquility?

How should we we manage outdoor lighting to support tranquility?

X Option NE6B (preferred option) - include clear requirements for development proposals to conserve or enhance the tranquility provided by dark skies

Provision of open space, recreation and leisure facilities

Issue NE7. How should we protect existing open space in the Local Plan?

How should we protect existing open space in the Local Plan?

X Option NE7B (preferred option) - identify and protect open spaces in the Local Plan, providing clear criteria to be met if open space is proposed to be lost

Issue NE8. How can we support accessible outdoor sports and recreation across the district?

Outdoor sports and recreation options

X Option NE8B (preferred option) - consider prioritising sport facilities where there is an identified lack of them

Issue NE9. How should we make sure our approach to local green spaces is still effective?

Green space approach options

X Option NE9B (preferred option) - keep the local green spaces identified in the current Local Plan

Tell us why you chose this option (local green spaces):

Submissions should be invited for other Local Green Space designations across the district.

Water environment and how it connects with our communities

Issue NE10. How do we approach development where there are coastal protection and overtopping hazard zones?

How do we approach development where there are coastal protection and overtopping hazard zones?

X Option NE10A - keep the current Local Plan approach of preventing all development within coastal protection and overtopping hazard zones

Tell us why you chose this option (coastal and overtopping zones):

Concerned that Option NE10B would encourage additional development and exacerbate flooding locally.

Issue NE11. How can we maximise the benefits of sustainable drainage systems (SuDS)?

Sustainable drainage systems options

X Option NE11B (preferred option) - encourage all developments to contain SuDS, and also keep the requirement to have enough drainage. Encourage SuDS to be designed to include other benefits and provide information and guidance on the design of them

Issue NE12. What should we do about groundwater protections?

Groundwater protection options

X Option NE12B (preferred option) - set clear requirements for development proposals in groundwater protection zones, nitrate vulnerable zones and drinking water safeguard zones