

Response to Local Plan Consultation, August 2021

Summary

This is the response of the City Council's Labour Group (the Group) to the 2021 consultation on the Local Plan.

While we are unhappy about the way the consultation has been framed and carried out (see "Flawed Consultation, below) the detailed policy options set out in the consultation offer some welcome improvements and we largely support them. We have made specific comments in the table which follows.

As a result of all this, the Group's priority order of high-level Growth options is:

1. Option A
2. Option E
3. Option C
4. Option D
5. Option B / Preferred option

Policy priorities:

We believe that the Council ought to begin the Plan by establishing its priorities against which various options can be assessed. The current consultation fails to do this, relying instead on a mix of anodyne aspirations and then explaining these with reams of technical information which are incomprehensible to the general public.

In our view the priorities must be:

- Climate change:
 - mitigate its impacts;
 - prevent any additional detriment;
 - reduce current and future emissions
- Quality of life:
 - invest in public realm space, especially green space, sports facilities and heritage
 - improve air quality
 - minimise traffic
- Housing:
 - provide housing which local people can afford to buy or rent, including a range of housing, including social housing that addresses the housing needs of those who cannot or do not wish to own their own home
 - improve the quality of design of new housing;
 - ensure that all new homes are as a minimum zero-carbon in use, and minimise carbon production from construction;
 - institute measures to improve the environmental performance of existing homes
- Communities:
 - Ensure all new-build developments comply to the 15-minute City principles, providing community amenities within easy walking and cycling distance;
 - use developer funding to improve community facilities in existing developments
- Economy:
 - build on the existing major employment sources (education, tourism)
 - expand tourist attractions

- improve the public realm in the City and coastal locations
- work with the universities and others to encourage former students to establish businesses in the district through “start-up” hubs and low cost business premises.
- Transport:
 - enhance and create cycling and walking routes between communities;
 - provide for regular, affordable bus travel to and from communities to key central resources and travel hubs;
 - act to reduce car usage for routine journeys

With those priorities in mind, the District should:

- build only the minimum number of homes required (9,000)
- mitigate the travel impacts by maximising active travel and public transport, not road building
- focus housebuilding on low-cost accommodation to accommodate the District’s existing homeless and rough sleeper populations before building other houses
- change the definition of “affordable housing” to that promoted by Shelter (housing costs to be no more than 27% of lower quartile disposable income in the district) and ensure that new developments deliver at least 35% of that category of housing

Flawed consultation

The Group considers the consultation to be fundamentally flawed in a number of ways:

- The “preferred option” has never been endorsed by Council. Putting it forward as “preferred” is highly likely to prejudice responses.
- Option B is in almost every respect the same as the “preferred” option. This is a nonsense, since (among other things) it offers respondents two opportunities to support the same scheme, again effectively skewing the results.
- The traffic analysis offered to support the preferred option is out of date. Worse, it altogether fails to analyse the impact of any of the proposed new developments within the preferred option on traffic movements. That is something which it is actually impossible to do because none of the sites for development have been identified. This renders any attempt to assess or create mitigation actions, including new road building, totally worthless.
- The traffic analysis fails to assess Option E
- There is no linkage made between the “strategic objectives”, the vision and the policy options set out. Nowhere can the reader understand how any policy option relates to these objectives.
- The vision statements are vague to the point of being meaningless.
- In many cases, there is inadequate evidence to support the proposals made
- There is an inherent risk in over-reliance on housebuilding to fund road building, as shown by the experience of the Sturry developments, which is that the high cost of new by-passes allows developers to argue to cut other s106 benefits, not least the proportion of affordable housing to be built. That risk is not mentioned in the consultation.

- The shortcomings of the web-based consultation portal have resulted in many residents' contributions being lost. The extension of time allowed once that was rectified was, in our view, inadequate given the time of year.
- Further, many organisations and individuals have as a result now submitted "free text" comments, as we have. This will inevitably make any analysis and comparison of the comments received more time consuming and less objective.

1) Draft vision and growth options	
The district vision by 2040	
<p>How strongly do you agree or disagree with the draft vision?</p> <p><i>(the ratings throughout the questionnaire are:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Strongly agree</i> <input type="checkbox"/> <i>Agree</i> <input type="checkbox"/> <i>Neutral</i> <input type="checkbox"/> <i>Disagree</i> <input type="checkbox"/> <i>Strongly disagree</i>) <p>Are there any comments you want to make about the draft vision?</p>	<p>We think the draft vision is weak. It posits outcomes, especially around the economy and employment, without any concomitant explanation as to how the proposed Policies will contribute to the achievement of the vision.</p> <p>There appears to be no recognition of the impact of “Airbnb” style lettings on the housing market in central Whitstable. We believe that this needs to be addressed as part of a package of measures to enable local residents to continue to be able to live in the town centre, which is essential to its year-round economic viability.</p> <p>No consideration seems to have been given to measures needed to protect Canterbury’s World Heritage Site status, nor to assessing the impact of any of the options on that status.</p>
Our strategic objectives	
<p>The vision is supported by strategic objectives, which set out how the district will be developed up to 2040. Tell us whether you agree or disagree with each option.</p>	<p>In some instances, there is an apparent discrepancy between these objectives and the detailed “preferred” policies which are in development. At no point is there any attempt to assess or correlate the policies offered against the objectives.</p>

<ol style="list-style-type: none"> 1. Provide high quality affordable housing for everyone as part of mixed, sustainable communities 2. Make sure housing is of high quality design, low carbon and energy efficient, with access to community facilities and open space 3. Create a thriving economy with a wide range of jobs, including more high paid jobs, to support increased opportunities for everyone 4. 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 5. 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 6. 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 7. 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 8. 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 9. Exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses, and 	<ol style="list-style-type: none"> 1. Agree but there must be more emphasis on social housing. Affordability should be linked to local wages not market values 2. Agree, but 'high quality' requires definition 3. Strongly agree, but what is the means to achieve this? 4. Agree 5. Strongly agree 6. There are two distinct issues here: <ol style="list-style-type: none"> a. links to London/continent: agree b. local 15 minute access: strongly agree 7. Agree 8. Strongly agree
---	--

<p>ensure the critical infrastructure is delivered at the right time to support development</p> <p>10. Create accessible vibrant town centres, maximising digital connectivity, for residents, visitors and businesses to shop, stay and enjoy their leisure time</p> <p>11. Protect and enhance our rich environment, creating spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities</p> <p>12. Adapt to and reduce the impacts of climate change by making sure new development is highly energy efficient and encourages low carbon lifestyles</p>	<p>9. Disagree: the emphasis on infrastructure goes against the priority for sustainability and climate change minimisation</p> <p>10. Agree – but this mixes several different issues and ignores the potential impact of the pandemic</p> <p>11. Strongly agree</p> <p>12. Agree, but this is only part of the solution needed. The target should be net zero in use and in construction</p>
<p>Growth options</p>	
<p>How much do you agree or disagree with the preferred option?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree 	<p>STRONGLY DISAGREE. We do not accept that building either an Eastern or Western by-pass can be justified by the flawed data which has been analysed.</p> <p>The costs for the by-passes are wholly speculative, being based on nothing more substantial than some lines on a map, with no detailed costing.</p> <p>This introduces a high risk that the roads will not be affordable, or will not be built at the timescales proposed, or will require the diversion of s106 and CIL funding from other community benefits.</p>

	<p>Building by-passes increases rather than reduces road traffic. The claims that this will remove “short trip” journeys from the inner ring road is not supported by evidence.</p> <p>It is not proven that the 2015/2017 data used has any relevance to current and future travel patterns and economic activity.</p> <p>There is no evidence which analyses travel to and from new development sites, simply because these have not been selected. The analysis does not take into account the potential mitigation of other alternative travel solutions, some of which are included elsewhere within the draft Local Plan.</p> <p>This plan delivers almost no benefits for the rural and coastal communities.</p>
<p>How much do you agree or disagree with Canterbury focus A?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree 	<p>STRONGLY AGREE.</p> <p>This is our preferred option.</p> <p>Given that a target of an additional 9,000 homes has been imposed on the District, this is the option which is least damaging to quality of life and the environment, and carries the least negative impact on climate change. We believe that this option carries the greatest opportunity to focus development on brownfield sites in the District, and thus to minimise building on agricultural and other green spaces.</p> <p>It also reduces the need for the two by-passes while still providing the funding for the inner-ring road improvement and other public transport and active travel options within all the urban areas.</p>

<p>How much do you agree or disagree with Canterbury focus B?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree 	<p>STRONGLY DISAGREE</p> <p>This option is barely discernible from the “preferred” option and we oppose it for the same reasons.</p>
<p>How much do you agree or disagree with the coastal focus option?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree 	<p>DISAGREE</p> <p>It is quite clear that there is not sufficient space for this scale of housebuilding in the coastal communities, and to do so would have a massive negative impact. This option would fail to meet most of the Strategic objectives.</p>
<p>How much do you agree or disagree with the rural focus option?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree 	<p>DISAGREE</p> <p>It is quite clear that there is not sufficient space for this scale of housebuilding in the rural communities, and to do so would have a massive negative impact. This option would fail to meet most of the Strategic objectives.</p>
<p>How much do you agree or disagree with the new freestanding settlement option?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Neutral <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree 	<p>AGREE.</p> <p>While we believe that this is the only option which has the potential to meet all the strategic objectives, we don’t think that the Council has done sufficient work with neighbouring Councils to be able to assess whether this is a viable solution or not.</p>
<p>Are there any other growth options we should consider?</p>	

<input type="checkbox"/> Yes <input type="checkbox"/> No	We believe that a more even distribution of developments is desirable and would be more achievable if the total target number is 9,000 over the Plan life.
---	--

2) Town centre strategies

Do you agree with vision and objectives for Canterbury city centre?	YES
Do you have any different suggestions?	NO
Do you agree with our vision and objectives for Herne Bay?	YES
Do you have any different suggestions?	NO
Do you agree with our vision and objectives for Whitstable?	YES
Do you have any different suggestions?	NO

3) Housing and new communities

<p>Issue HNC1. How should we make sure the right types and tenures of housing are provided?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC1A - continue current approach to allow some flexibility for developers to provide a mix of homes within a broad range <input type="checkbox"/> Option HNC1B - set specific housing mix targets which each site must deliver, based on the identified needs for size, type and tenure, across different parts of the district <input type="checkbox"/> Option HNC1C - (preferred option) - set specific housing mix targets which each site must deliver and identify opportunity sites for specific types or tenures <p>Tell us why you chose this option (types of housing): If you think there's a better option for housing types, let us know:</p>	<p>HNC1C – although we do consider that it is important that this is “based on the identified needs for size, type and tenure, across different parts of the district” as per HNC1B.</p> <p>We also believe that it is important to encourage Housing Associations, not just commercial developers, to build new homes.</p> <p>The Council should increase the availability of lower cost housing, by, for example:</p> <ul style="list-style-type: none"> ● buying off plan from developers at a discount ● looking into options for quick build homes
---	---

	<ul style="list-style-type: none"> • creating ethical loan schemes to encourage Community building • developing its own housing sites (e.g. Military Road) to provide a minimum of 500 council properties. • providing land for Community led housing at a price to maximise social value, identifying areas and working with community to develop them • borrowing to buy land for affordable housing <p>Finally, all new Council housing should be built to Passivhaus standards</p>
<p>Issue HNC2. How should we provide opportunities for small and medium sized housing developments?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC2A - continue current approach to small and medium sites <input type="checkbox"/> Option HNC2B - Increase proportion of supply coming from small and medium sites through additional allocations and windfall sites <input type="checkbox"/> Option HNC2C (preferred option) - maximise opportunities for delivery of small and medium sites to deliver new homes <p>Tell us why you chose this option (housing developments): if you think there's a better option for small and medium housing developments, let us know:</p>	<p>HNC2C</p>
<p>How should we provide opportunities for suitable brownfield and regeneration developments?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC3A - continue with the current approach to brownfield sites <input type="checkbox"/> Option HNC3B (preferred option) - maximise opportunities for delivery of suitable brownfield and regeneration developments 	<p>HNC3B</p>

<p>Tell us why you chose this option (brownfield and regeneration): If you think there's a better option for brownfield and regeneration land, let us know:</p>	
<p>Issue HNC4. How should we make sure that the right densities are delivered in developments across the district?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC4A - continue current approach of influencing site density through good design <input type="checkbox"/> Option HNC4B - identify a minimum density for the district as a whole, and continue the current approach of influencing site density through good design <input type="checkbox"/> 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 <p>Tell us why you chose this option (housing densities): If you think there's a better option for housing densities, let us know:</p>	<p>HNC4C</p>
<p>Issue HNC5. How should we make sure housing is provided for rural communities?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC5A - continue existing approach to rural housing development <input type="checkbox"/> Option HNC5B - focus rural housing development at the rural service centres, and support infill development at other settlements within village boundaries <input type="checkbox"/> Option HNC5C (preferred option) - support housing developments, at and adjacent to, rural services centres, local centres and villages where this provides affordable housing <p>Tell us why you chose this option (rural housing):</p>	<p>HNC5C</p>

If you think there's a better option for rural housing, let us know:	
Community infrastructure and design	
<p>Issue HNC6. How can we support sustainable living in new communities?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC6A - keep the existing approach to supporting sustainable living in new communities <input type="checkbox"/> Option HNC6B - set clear requirements for new or improved social and community infrastructure to be delivered as part of strategic developments <input type="checkbox"/> 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 <p>Tell us why you chose this option (sustainable living): If you think there's a better option for supporting sustainable living, let us know</p>	HNC6C
<p>Issue HNC7. How should we make sure all design is of high quality?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC7A - keep current criteria based approach to design <input type="checkbox"/> Option HNC7B - use the new National Design Guide and National Model Design Code <input type="checkbox"/> 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 	HNC7C

<p>Tell us why you chose this option (design quality): If you think there's a better option for high quality design, let us know:</p>	
<p>Issue HNC8. How can we deliver low carbon and energy efficient housing?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC8A - keep current approach but with indicative net zero <input type="checkbox"/> Option HNC8B - early introduction of Future Homes Standard <input type="checkbox"/> Option HNC8C - (preferred option) all new homes delivered to net zero <p>Tell us why you chose this option (low carbon new homes): If you think there's a better option for low carbon new homes, let us know:</p>	<p>HNC8C</p>
<p>How should we do this for refurbishments and changes to existing homes?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC8D – require planning applications to have an energy plan for improvements to energy performance <input type="checkbox"/> 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 <input type="checkbox"/> Option HNC8F – (preferred option) set higher local domestic build energy standards for changes to existing homes, and require planning applications to have an energy plan for improvements to energy performance <p>Tell us why you chose this option (low carbon existing homes): If you think there's a better option for low carbon existing homes, let us know:</p>	<p>HNC8F</p>
<p>Issue HNC8. How should we improve water efficiency?</p>	

<ul style="list-style-type: none"> <input type="checkbox"/> Option HNC8G - continue with the current approach to water efficiency <input type="checkbox"/> Option HNC8H - require proposals for new homes to show the higher water efficiency standard of 110 litres per person per day <input type="checkbox"/> Option HNC8I - (Preferred option) blended approach to require proposals for new homes to show the higher water efficiency standard, and for large or strategic sites to exceed the current building regulations <p>Tell us why you chose this option: If you think there's a better option, let us know:</p>	<p>HNC8I</p>
<p>Issue HNC8. How will we incorporate renewable energy into new developments?</p> <p>How will we incorporate renewable energy into new developments?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC8J - keep the current approach to reducing carbon emissions associated with energy from new developments <input type="checkbox"/> Option HNC8K - (preferred option) require all new large or strategic developments to show decentralised energy supply <p>Tell us why you chose this option: If you think there's a better option, let us know:</p>	<p>HNC8K – this requirement should be clarified, strengthened and amplified in detail, including what proportion should be decentralised supply and what sources are acceptable.</p> <p>Air and ground source heat pumps should be mandatory in place of gas fired central heating boilers in all new builds and renovations.</p> <p>Solar electricity generation should also be compulsory on all new build and all suitable renovations.</p>
<p>Specialist housing need</p>	
<p>Issue HNC9. How should we provide housing for older people?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC9A - all large or strategic sites to provide a proportion of the site for older persons' housing (for example 5%) 	<p>HN9C</p>

<ul style="list-style-type: none"> <input type="checkbox"/> Option HNC9B - allocate specific sites for the delivery of older persons' housing <input type="checkbox"/> 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 <p>Tell us why you chose this option (housing for older people):</p> <p>If you think there's a better option for housing for older people, let us know:</p>	
<p>Issue HNC10. How should we provide accessible and disability-friendly homes?</p> <p>How should we approach providing accessible and disability-friendly homes?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC10A - continue current approach for 20% of new properties to be built to M4 (2) standards on major developments and strategic sites <input type="checkbox"/> Option HNC10B - make sure that all new properties are built to a minimum of M4 (2) standards, and encourage M4 (3) standards <input type="checkbox"/> 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 <p>Tell us why you chose this option (disability friendly homes):</p> <p>If you think there's a better option for disability friendly homes, let us know:</p>	<p>HN10C.</p> <p>A move over the life of the plan to the higher standard, which should include all renovations as well, should be included in the Local Plan, with target dates for implementation of each.</p>
<p>Issue HNC11. How and where should we provide new student accommodation?</p>	<p>HNC11C</p>

<p>Option HNC11A - keep current approach to purpose built student accommodation</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC11B - provide purpose built student accommodation only on or near campus, for example within a 5-10 minute walk of the campus <input type="checkbox"/> Option HNC11C (preferred option) - provide purpose built student accommodation on or near campus, for example a 5-10 minute walk of the campus, but also have some flexibility on alternative locations subject to strict criteria <p>Tell us why you chose this option (student housing): If you think there's a better option for student housing, let us know:</p>	<p>This is essential to help rebuild communities in the City. We believe that the plan should remove reference to alternative locations or be much clearer about what the criteria for alternatives will be.</p>
<p>Issue HNC12. How should we provide accommodation for gypsies and travellers?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC12A - keep current approach to meeting gypsy and traveller housing needs <input type="checkbox"/> Option HNC12B - allocate new pitches (either as new sites or extensions to existing sites) to meet gypsy and traveller housing needs <input type="checkbox"/> Option HNC12C (preferred option) - keep current approach and take opportunities through the Local Plan to allocate new pitches where suitable sites are identified <p>Tell us why you chose this option (gypsy and traveller accommodation): If you think there's a better option for gypsy and traveller accommodation, let us know:</p>	<p>HNC12B</p> <p>The current provision is inadequate to the needs of these communities. Until this is rectified it will be more difficult to legitimately enforce planning rules on key sites and the Traveller communities will be discriminated against.</p>
<p>How should we provide opportunities for self and custom-build housing?</p>	

<ul style="list-style-type: none"> <input type="checkbox"/> Option HNC13A - all large or strategic sites to provide a proportion of plots for self and custom-built homes (for example 5%) <input type="checkbox"/> Option HNC13B - allocate specific small sites (up to 10 units) for the delivery of self and custom-build housing <input type="checkbox"/> 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 <p>Tell us why you chose this option (self and custom build): If you think there's a better option for self or custom build, let us know:</p>	<p>HNC13C</p>
<p>HNC14 How can we maximise the benefits of strategic infrastructure investment for residents and businesses?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC14A - keep current approach to strategic infrastructure projects <input type="checkbox"/> Option HNC14B - provide overarching general support for strategic infrastructure projects which are needed to support growth <input type="checkbox"/> Option HNC14C (preferred option) - provide overarching general support for strategic infrastructure projects needed to support growth, and identify specific allocations and set criteria, for example, design for proposals where justified <p>Tell us why you chose this option (strategic infrastructure): If you think there's a better option for strategic infrastructure, let us know:</p>	<p>HNC14C</p> <p>This is very vaguely worded and needs tightening. Clarification of which elements of infrastructure are to be funded by which type of site is critical.</p>
<p>Issue HNC15. How can we enhance the production of community and utility scale renewable energy?</p>	<p>HNC14B</p>

<ul style="list-style-type: none"> <input type="checkbox"/> Option HNC15A - keep the current approach to renewable and low carbon energy production development <input type="checkbox"/> 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 <p>Tell us why you chose this option (renewable energy):</p> <p>If you think there's a better option for renewable energy, let us know:</p>	<p>All developments at and above “medium” scale should be required to provide renewable energy to meet base demand. See also our comments on HNC8.</p>
<p>Issue HNC16. How can we make sure that infrastructure is delivered at the right time to support development?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC16A - keep current approach to infrastructure delivery <input type="checkbox"/> Option HNC16B - set clear requirements that necessary infrastructure must be provided in a timely manner to address the impacts of development <input type="checkbox"/> 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 <p>Tell us why you chose this option (infrastructure right time):</p> <p>If you think there's a better option for delivering infrastructure at the right time, let us know:</p>	<p>HNC16C</p> <p>This is still weak. Transport infrastructure (not only roads but also walking and cycling routes and the introduction of bus services) should specifically be provided and completed ahead of developments being even partially occupied.</p> <p>If the by-pass option goes through (which we are opposed to), then the bypasses should be built before any further large and medium scale developments are started, so as to provide immediate mitigation.</p>

<p>Issue HNC17. How should we address changes in development viability at the planning application stage?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option HNC17A - keep current approach to accepting viability assessments <input type="checkbox"/> Option HNC17B - no new viability evidence is accepted at planning application stage <input type="checkbox"/> Option HNC17C (preferred option) - set clear and limited criteria where new viability evidence is accepted at planning application stage <p>Tell us why you chose this option (development viability changes):</p> <p>If you think there's a better option for development viability changes, let us know</p>	<p>HNC17C</p>
<p>4) Employment and the local economy</p>	
<p>Issue EMP1 - How should we ensure that enough business space is provided in the right locations to support growth? *</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option EMP1A - Continue with current economic strategy and land allocations <input type="checkbox"/> Option EMP1B - Continue with current economic strategy and land allocations, but remove sites with significant deliverability risks <input type="checkbox"/> 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 	<p>EMP1C</p> <p>Specific emphasis should be placed on developing non-retail (e.g. office) space on the periphery of residential areas.</p> <p>See also EMP4 which covers this issue</p>

<p>Tell us why you chose this option *</p> <p>If you think there's a better option, let us know:</p>	
<p>Issue EMP2 - Provide the right mix of jobs</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option EMP2A - Identify specific opportunity sites for higher value jobs creation, and set out detailed employment mixes for allocated employment sites <input type="checkbox"/> Option EMP2B - Provide full market flexibility within identified employment sites <input type="checkbox"/> 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 <p>Tell us why you chose this option *</p> <p>If you think there's a better option, let us know:</p>	<p>EMP2C</p> <p>This is vague requires clarification of what “blends” are acceptable.</p>
<p>Issue EMP3 - Supporting the delivery of allocated employment sites</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option EMP3A - Continue with current approach to delivery <input type="checkbox"/> Option EMP3B - Require that all strategic development sites provide serviced employment land and a delivery strategy <input type="checkbox"/> 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 	<p>EMP3C</p>

<p>Tell us why you chose this option * If you think there's a better option, let us know:</p>	
<p>Issue EMP4: Improving the accessibility and connectivity of employment areas</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option EMP4A - Enable new employment developments to provide digital infrastructure and sustainable transport connectivity in response to market demand <input type="checkbox"/> Option EMP4B - Require all new employment developments to provide full fibre connections and be accessible by sustainable transport <input type="checkbox"/> 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 <p>Tell us why you chose this option * If you think there's a better option, let us know:</p>	<p>EMP4C</p>
<p>Issue EMP5: Improving the energy performance and carbon emissions of new commercial developments</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option EMP5A: Specify that all new commercial buildings must be designed to BREEAM Excellent <input type="checkbox"/> Option EMP5B: Specify that all new commercial buildings must be designed to BREEAM Outstanding <input type="checkbox"/> Option EMP5C: Specify that all new commercial buildings or change of use to commercial must be designed to meet Level A or better on the Energy Performance Certificate using the Standard Assessment Procedure <input type="checkbox"/> Option EMP5D: (preferred option) Net zero now. Specify that all new commercial buildings or change of use to commercial must 	<p>EMP5D</p>

<p>be designed to meet an A+ Energy Performance Certificate using the Standard Assessment Procedure</p> <p>Tell us why you chose this option If you think there's a better option, let us know:</p>	
<p>Issue EMP6 - How should we support the development of our universities? *</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option EMP6A - Continue with current approach to university development <input type="checkbox"/> Option EMP6B (preferred option) - Align the Local Plan with the growth plans of the universities <p>Tell us why you chose this option If you think there's a better option, let us know:</p>	<p>EMP6B is preferred. However, we think that there is a better alternative, which is for the universities' growth plans to be integrated into the Local Plan and to align with it, especially as they qualify as "higher paid employment locations referred to in EMP2</p>
<p>Issue EMP7: How can we support the delivery of new, high quality tourist accommodation to boost overnight stays and support the local economy?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option EMP7A - Focus tourist accommodation within or on the edge of the town and city centres <input type="checkbox"/> Option EMP7B - Focus tourist accommodation within or on the edge of the town and city centres and identify specific opportunity sites for tourist accommodation outside of the city and town centres, where justified, to support economic growth e.g. for meetings and conference accommodation <input type="checkbox"/> Option EMP7C (preferred option) - Maintain support for city and town centre accommodation provision, identify specific opportunity sites elsewhere, where justified, and provide increased flexibility for tourist accommodation provision across the district, including within the rural areas, to respond to market demand 	<p>EMP7C</p>

<p>Tell us why you chose this option</p> <p>If you think there's a better option, let us know:</p>	
<p>Issue EMP8: Supporting growth of the rural economy</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option EMP8A - Continue the current approach to focus new rural employment development within existing employment sites <input type="checkbox"/> Option EMP8B (preferred option) - Provide increased flexibility for the provision of rural employment development within and outside of sustainable rural settlements, adjacent to existing employment sites and provide specific support to new agricultural developments <p>Tell us why you chose this option</p> <p>If you think there's a better option, let us know:</p>	<p>EMP8B</p>
<p>5) Town centres and local facilities</p>	
<p>Issue TCLF1. How should we designate the hierarchy of centres in the district?</p> <p>Option TCLF1A - amend the existing hierarchy of centres</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option TCLF1A - amend the existing hierarchy of centres <input type="checkbox"/> Option TCLF1B (preferred option) - keep the existing hierarchy of centres <p>Tell us why you chose this option:</p> <p>If you think there's a better option, let us know:</p>	<p>We have no view on this</p>

<p>Issue TCLF2. How should we support appropriate growth and development at out-of-town retail areas in Canterbury?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option TCLF2A - continue with current approach to development at the out-of-town areas <input type="checkbox"/> 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 <p>Tell us why you chose this option: If you think there's a better option, let us know:</p>	<p>TCLF2B is preferable, but neither is clear enough to be our preferred option. The problem here is that “out-of-town- retail” is key to the 15 minute community concept, but large scale warehouse units will attract excessive traffic.</p> <p>Therefore we propose a refinement, so that it is clear that out-of-town retail units which are intended to support the local community and should comply with the 15 minute travel principle are permitted, but that there should be no large scale no “warehouse” scale units built which are aimed at people travelling to shop by car.</p>
<p>Issue TCLF3. How should we support and protect our local centres?</p> <p>How should we do this for Wincheap?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option TCLF3A - keep the Wincheap local centre identified in the current Local Plan <input type="checkbox"/> Option TCLF3B - (preferred option) keep the Wincheap local centre with boundary changes suggested <p>How should we do this for Tankerton Road?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option TCLF3C – change the boundary of the existing Tankerton Road local centre <input type="checkbox"/> Option TCLF3D – (preferred option) keep the Tankerton Road local centre identified in the current Local Plan <p>How should we do this for Herne Bay Road/St John's Road?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option TCLF3E – keep the Herne Bay Road/St John's Road local centre identified in the current Local Plan 	<p>We have no view on this</p>

<p><input type="checkbox"/> Option TCLF3F – (preferred option) keep the Herne Bay/St John’s road local centre with boundary changes suggested</p> <p>How should we do this for Sea Street?</p> <p><input type="checkbox"/> Option TCLF3G – keep the Sea Street local centre identified in the current Local Plan</p> <p><input type="checkbox"/> Option TCLF3H – (preferred option) keep the Sea Street local centre with boundary changes suggested</p> <p>How should we do this for Canterbury Road in Herne Bay</p> <p><input type="checkbox"/> Option TCLF3I – change the boundary of the existing Canterbury Road local centre</p> <p><input type="checkbox"/> Option TCLF3J – (preferred option) keep the Canterbury Road local centre identified in the current Local Plan</p>	
<p>Issue TCFL4. How can we best support our village centres?</p> <p><input type="checkbox"/> Option TCLF4A - continue with the current approach to services and facilities in the rural settlements</p> <p><input type="checkbox"/> Option TCLF4B - (preferred option) designate village centres to protect and improve the existing provision of services and facilities within the rural settlements</p> <p>Tell us why you chose this option:</p> <p>If you think there's a better option, let us know:</p>	<p>TCLF4B</p>
<p>6) Movement and transport</p>	
<p>Issue MT1. How can we maximise active travel in the district?</p>	

<ul style="list-style-type: none"> <input type="checkbox"/> Option MT1A - continue with the current approach to safeguard pedestrian and cycle routes <input type="checkbox"/> Option MT1B - all new developments must show how they will maximise opportunities for walking and cycling <p>Tell us why you chose this option: If you think there's a better option, let us know:</p>	<p>MT1B</p> <p>We believe that the District needs clean air zones in the City and central Whitstable. It would be useful to be able to apply a congestion charge which would help with funding and provide an immediate reduction in traffic).</p> <p>Implementing the SWECO report to create much improved cycling and walking routes on most of the City's ring road and across the city would reduce car use.</p> <p>All this requires the addition of specific creation of separate cycle paths and direct and well-lit walking routes.</p>
<p>Issue MT2. How do we enable greater use of public transport in the district?</p> <p>How should we do this for road travel?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option MT2A - continue with the current approach to bus improvements <input type="checkbox"/> Option MT2B - all major developments must show how they will maximise access to the existing local bus network <p>Tell us why you chose this option (road travel): If you think there's a better option for road travel, let us know:</p>	<p>MT2B</p> <p>The constraints on this are not stated. There must be flexibility to create heavily subsidised bus routes funded by infrastructure levies (S106 and CIL) as an alternative to building more roads.</p> <p>All bus stops must be provided with shelters.</p>
<p>How should we do this for train travel?</p>	

<ul style="list-style-type: none"> <input type="checkbox"/> Option MT2C - continue with the current approach to rail improvements <input type="checkbox"/> Option MT2D - all major developments must show how they will maximise access to rail services <p>Tell us why you chose this option (train travel): If you think there's a better option for train travel, let us know:</p>	<p>MT2D</p>
<p>Issue MT3. How will we enable the rapid transition to zero emissions vehicles?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option MT3A - continue with the existing approach to electric vehicle infrastructure <input type="checkbox"/> Option MT3B - accelerated transition to zero emissions vehicles <p>Tell us why you chose this option: If you think there's a better option, let us know:</p>	<p>MT3B</p>
<p>Issue MT4. How should we approach parking standards in the Local Plan?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option MT4A - continue with the current approach to parking standards <input type="checkbox"/> Option MT4B - remove parking standards and adopt a more flexible approach specific sites <input type="checkbox"/> 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 <p>Tell us why you chose this option:</p>	<p>It is unclear why we would reduce car parking in “sustainable” locations. There should be much reduced off-street car parking provision at retail locations, provided that public transport and active travel options have been introduced.</p> <p>Parking standards for domestic housing should reflect the likely occupancy of the houses.</p>

<p>If you think there's a better option, let us know:</p>	
<p>Issue MT5. How should we approach transport assessments, transport statements and travel plans?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option MT5A - continue with the current approach to transport assessments and travel plans <input type="checkbox"/> Option MT5B - all major developments must submit transport assessments and travel plans <input type="checkbox"/> Option MT5C - all major developments must submit transport assessments and travel plans, with additional criteria to cover other types of development which could have significant impacts on the network, and all minor developments would have to submit transport statements 	<p>MT5C</p>
<p>7) Historic and natural environment</p>	
<p>Issue NE1. How can we protect and enhance our heritage assets?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE1A (preferred option) - continue with the current Local Plan approach <input type="checkbox"/> Option NE1B - make changes to the current Local Plan policies 	<p>NE1B</p>
<p>Issue NE2. How can we support the adaptation of the historic environment to achieve improvements in carbon emissions and energy efficiency?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE2A - continue with the current approach which gives general design policies 	<p>NE2B</p>

<ul style="list-style-type: none"> <input type="checkbox"/> Option NE2B (preferred option) - support the adaptation and retrofitting of buildings in conservation areas and historic buildings through new guidance 	
<p>Protection and enhancement of wildlife and biodiversity</p>	
<p>Issue NE3. How should we protect and enhance biodiversity and green and blue spaces like parks and rivers?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE3A: continue with the current Local Plan approach of new developments providing and extending green infrastructure (including trees) where they can, and set a 10% biodiversity net gain requirement <input type="checkbox"/> Option NE3B - require new developments to enhance existing, or provide new, green spaces to conserve and where possible enhance blue spaces, plus a 10% biodiversity net gain <input type="checkbox"/> 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 	<p>NE3C</p> <p>We believe that it is essential to strengthen the biodiversity target from that proposed.</p>
<p>Issue NE4. How should we make sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscapes?</p>	<p>The Plan should aim to create more country parks and prevent infill development (see NE7)</p>
<p>Issue QNE5. How should we make sure our approach to green gaps is still effective?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE5A - keep the current approach to development acceptable in green gaps 	<p>Neither. Green gap provision should be strengthened</p>

<ul style="list-style-type: none"> <input type="checkbox"/> Option NE5B (preferred option) - broaden the types of development that might be acceptable in these areas to encourage community facilities, including open space and recreation 	
<p>Issue NE6. How should we manage outdoor lighting to support tranquillity?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE6A - continue with the current Local Plan approach of using a design criteria when assessing outdoor lighting proposals <input type="checkbox"/> Option NE6B (preferred option) - include clear requirements for development proposals to conserve or enhance the tranquillity provided by dark skies 	<p>NE6B</p>
<p>Issue NE7. How should we protect existing open space in the Local Plan?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE7A - continue with the existing approach <input type="checkbox"/> 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 	<p>NE7B</p> <p>There should be no loss of open spaces in urban and suburban areas</p>
<p>Issue NE8. How can we support accessible outdoor sports and recreation across the district?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE8A - keep the current approach <input type="checkbox"/> Option NE8B (preferred option) - consider prioritising sport facilities where there is an identified lack of them 	<p>NE8B</p>

<p>Issue NE9. How should we make sure our approach to local green spaces is still effective?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE9A - consider removing the existing local green space <input type="checkbox"/> Option NE9B (preferred option) - keep the local green spaces identified in the current Local Plan 	<p>We believe that NE9B is inadequate to the challenges of the scale of growth proposed. Green spaces are at a premium already, and are essential to achieving the stated objective to “Protect and enhance our rich environment, creating spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities”</p> <p>We therefore propose that the Local Plan should significantly add to the list of local green spaces</p>
<p>Issue NE11. How can we maximise the benefits of sustainable drainage systems (SuDS)?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE11A - keep the current approach to require enough drainage and encourage major developments to design SuDS that include other benefits <input type="checkbox"/> 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 	<p>NE11B</p>
<p>Issue NE12. What should we do about groundwater protections?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Option NE12A - keep the existing approach of having groundwater protection zones <input type="checkbox"/> Option NE12B (preferred option) - set clear requirements for development proposals in groundwater protection zones, nitrate vulnerable zones and drinking water safeguard zones 	<p>NE12B</p>
<p>Sustainability Appraisal</p>	

Key Objectives & Policies – Transport	
4 – Sustainability Appraisal Approach	
5 – Draft District Vision	