

Local plan consultation

The district vision by 2040	2
A strong and resilient economy	2
Growth centred on Canterbury	2
Healthy communities	2
Improved connectivity	2
Our strategic objectives	2
Growth options	2
The preferred option	2
Canterbury focus A	2
Canterbury focus B	2
Coastal focus	2
Rural focus	2
New freestanding settlement	2
Town centre strategies	2
Canterbury city centre vision	2
Canterbury city centre objectives	2
Herne Bay vision	2
Herne Bay objectives	2
Whitstable vision	2
Whitstable objectives	2
Housing and new communities	2
Meeting housing needs	2
Issue HNC1. How should we make sure the right types and tenures of housing are provided?	2
Issue HNC2. How should we provide opportunities for small and medium sized housing developments?	2
Issue HNC3. How should we provide opportunities for suitable brownfield and regeneration developments?	2
Issue HNC4. How should we make sure that the right densities are delivered in developments across the district?	2
Issue HNC5. How should we make sure housing is provided for rural communities?	2
Community infrastructure and design	2
Issue HNC6. How can we support sustainable living in new communities?	2
Issue HNC7. How should we make sure all design is of high quality?	2
Issue HNC8. How can we deliver low carbon and energy efficient housing?	2
Issue HNC8. How should we improve water efficiency?	2
Issue HNC8. How will we incorporate renewable energy into new developments?	2
Specialist housing need	2
Issue HNC9. How should we provide housing for older people?	2
Issue HNC10. How should we provide accessible and disability-friendly homes?	2
Issue HNC11. How and where should we provide new student accommodation?	2
Issue HNC12. How should we provide accommodation for gypsies and travellers?	2
Issue HNC13. How should we support opportunities for self and custom-build housing?	2
Delivering infrastructure to support growth	2

Issue HNC14. How can we maximise the benefits of strategic infrastructure investment for residents and businesses?	2
Issue HNC15. How can we enhance the production of community and utility scale renewable energy?	2
Issue HNC16. How can we make sure that infrastructure is delivered at the right time to support development?	2
Issue HNC17. How should we address changes in development viability at the planning application stage?	2
Employment and the local economy	2
Issue EMP1 - Provide enough business space in the right locations	2
Issue EMP2 - Provide the right mix of jobs	2
Issue EMP3 - Supporting the delivery of allocated employment sites	2
Issue EMP4: Improving the accessibility and connectivity of employment areas	2
Issue EMP5: Improving the energy performance and carbon emissions of new commercial developments	2
Issue EMP6 - Supporting the development of our universities	2
Issue EMP7: Supporting new tourist accommodation	2
Issue EMP8: Supporting growth of the rural economy	2
Town centres and local facilities	2
Issue TCLF1. How should we designate the hierarchy of centres in the district?	2
Issue TCLF2. How should we support appropriate growth and development at out-of-town retail areas in Canterbury?	2
Issue TCLF3. How should we support and protect our local centres?	2
Issue TCFL4. How can we best support our village centres?	2
Movement and transport	2
Issue MT1. How can we maximise active travel in the district?	2
Issue MT2. How do we enable greater use of public transport in the district?	2
Issue MT3. How will we enable the rapid transition to zero emissions vehicles?	2
Issue MT4. How should we approach parking standards in the Local Plan?	2
Issue MT5. How should we approach transport assessments, transport statements and travel plans?	2
Heritage and the historic environment	2
Issue NE1. How can we protect and enhance our heritage assets?	2
Issue NE2. How can we support the adaptation of the historic environment to achieve improvements in carbon emissions and energy efficiency?	2
Protection and enhancement of wildlife and biodiversity	2
Issue NE3. How should we protect and enhance biodiversity and green and blue spaces like parks and rivers?	2
Protecting and enhancing the character of our valued landscapes	2
Issue NE4. How should we make sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscapes?	2
Issue QNE5. How should we make sure our approach to green gaps is still effective?	2
Issue NE6. How should we manage outdoor lighting to support tranquility?	2
Provision of open space, recreation and leisure facilities	2
Issue NE7. How should we protect existing open space in the Local Plan?	2
Issue NE8. How can we support accessible outdoor sports and recreation across the district?	2
Issue NE9. How should we make sure our approach to local green spaces is still effective?	2

Water environment and how it connects with our communities	2
Issue NE10. How do we approach development where there are coastal protection and overtopping hazard zones?	2
Issue NE11. How can we maximise the benefits of sustainable drainage systems (SuDS)?	2
Issue NE12. What should we do about groundwater protections?	2
Local Plan - sustainability appraisal	2

The district vision by 2040

A strong and resilient economy

The district will be stronger and more resilient by 2040; offering high skilled jobs in areas like science and technology, thanks to the growth and development of universities and a strong medical sector. Business investors will continue to be attracted by the district's connection to London and the continent, with new and diverse employment opportunities for local people.

Growth centred on Canterbury

Growth and investment in the district will be centred on Canterbury, and complemented by an enhanced historic and natural environment that will create vibrant cultural and creative areas, and improved biodiversity. All of this means quality of life for residents and the visitor experience are hugely improved.

Healthy communities

Investment in digital infrastructure and walking and cycling routes will have helped to improve air quality and the challenges of climate change, supporting good health and wellbeing in our communities.

Improved connectivity

Existing communities will be enhanced, and new healthy communities will be of high quality, low carbon design; with good public transport to the city and beyond. There will also be high quality, attractive public spaces and good access to local community facilities. A range of homes will meet the needs of the district, improve affordability and support growth.

How strongly do you agree or disagree with the draft vision?

- Strongly agree
- Agree
- Neutral**
- Disagree
- Strongly disagree

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

It all depends on what the vision leads to in reality. The words sound fine until one sees that elements of this vision are contradicted or seriously undermined by proposals in your preferred option Canterbury Focus B.

NB Future consultations on the Local Plan should be much better advertised.

Our strategic objectives *See comments at the end of the Strategic objectives*

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.

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree – especially in relation to access to open space**
- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral - all far too general
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree

- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree

- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

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

Agreeing or disagreeing with these objectives in isolation has little meaning – what matters is how they are implemented. The problem is that they are inherently contradictory and are undermined by many elements of your preferred choice of Canterbury Focus B. For ex, you aim to “Protect and enhance our rich environment, creating spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities” .This is sabotaged by other objectives & Growth Options and by specific infrastructure developments which are environmentally damaging, worsen air quality and health and threaten wildlife. Transport is mentioned only in general terms, but the specific developments such as new road building, which the Draft Plan indicates in its Preferred option map but does not discuss, will undermine many of your strategic objectives outlined above.

Growth options

The preferred option

Based upon the draft vision and strategic objectives, we think that the preferred growth option that is emerging is:

Growth to be focused on Canterbury to take advantage of the economic potential found in its heritage and universities.

To support this, there will be an extra 14,000 to 17,000 homes by 2040 and an upgrade to the A28 road, as well as significantly improved public spaces and less car use.

Strategic housing growth would be well connected through expansion of the city, and new communities would be supported by community infrastructure like schools and shops, plus open spaces.

There would also be some expansion at the coast and in villages, to support housing needs and the regeneration of Herne Bay.

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree**

I disagree strongly with the draft vision for two main reasons.

Firstly, I disagree strongly with the proposal to build 14000-17000 new houses as this would overwhelm a city the size of Canterbury. 14-17000 new houses plus the accompanying infrastructure also risk increasing existing problems of air pollution and congestion & will place huge strain on other infrastructure, esp water & drainage. How is the building of up to 17000 houses compatible with the protection of biodiversity & the rich environment? The government requirement is for 9000 – that is more than enough.

Secondly, I object strongly to the proposed relief road/bypass to the west of the city, indicated on the very schematic map. This new road would either tarmac over or at the very least compromise & pollute by proximity areas of farmland & woodland, playing fields and the 2 meadows, Dukes Meadow & Neal's Place meadow. Both the meadows are well-used green spaces which are part of our 'rich environment' and which are important for the health and well-being of the neighbouring communities.

Choosing Canterbury Focus B is fundamentally destructive.

Other options

Canterbury focus A

- Growth focused on Canterbury with more limited growth at the coast and villages

- Minimum development of 9,000 homes to meet government targets
- Reallocation of road space on the ring road to provide safer, more attractive routes for walking and cycling
- Further investment in Park and Ride and bus infrastructure, like new bus lanes

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

Select an option:

- Strongly agree
- Agree**
- Neutral
- Disagree
- Strongly disagree

The current Focus A proposal to build up to 9000 houses is preferable to the 14000-17000 recommended in the Preferred Option / Canterbury Focus B. Focus A in its current form looks less destructive and damaging than Focus B and more likely to be manageable and affordable. However, why is it all or nothing – can't the 9000 houses be shared out in the district (rural & coastal as well) according to where there is need and space?

Canterbury focus B

- Growth focused on Canterbury with more limited development at the coast and villages
- Additional development of 14,000 homes to allow for further economic growth and significant investment in local transport
- Significant upgrading of the A28 road so that through-traffic can bypass the city centre
- Reallocation of road space on the ring road to provide safer, more attractive routes for walking and cycling
- Further investment in Park and Ride and bus infrastructure, like new bus lanes

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree**

I disagree strongly with the draft vision for two main reasons. Firstly, I disagree strongly with the proposal to build 14000-17000 new houses as this would overwhelm a city the size of Canterbury. 14-17000 new houses plus the accompanying infrastructure also risk increasing existing problems of air pollution and congestion & will place huge strain on other infrastructure, esp water & drainage. How is the building of up to 17000 houses compatible with the protection of biodiversity &

the rich environment? The government requirement is for 9000 – that is more than enough.

*Secondly, I object strongly to the proposed relief road/bypass to the west of the city, indicated on the very schematic map. This new road would either tarmac over or at the very least compromise & pollute by proximity areas of farmland & woodland, playing fields and the 2 meadows, Dukes Meadow & Neal's Place meadow. Both the meadows are well-used green spaces which are part of our 'rich environment' and which are important for the health and well-being of the neighbouring communities.
Choosing Canterbury Focus B is fundamentally destructive.*

Coastal focus

- Growth focused at the coast with more limited development at Canterbury and the villages
- Minimum development of 9,000 homes to meet government targets
- A new Park and Ride for Whitstable, supported by frequent bus services and investment in coastal walking and cycling routes

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

Select an option:

- Strongly agree
- Agree
- Neutral**
- Disagree
- Strongly disagree

Rural focus

- Growth focused in sustainable rural areas, with some growth at villages and hamlets, and more limited growth at Canterbury, Whitstable and Herne Bay
- Minimum development of 9,000 homes to meet government targets
- Public transport improvements connecting rural areas with urban areas

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

Select an option:

- Strongly agree
- Agree
- Neutral**
- Disagree
- Strongly disagree

New freestanding settlement

- Growth focused at a new freestanding settlement, with more limited growth at Canterbury, Whitstable and Herne Bay and rural areas
- Minimum development of 9,000 homes to meet government targets
- New transport infrastructure to support the new community

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

Select an option:

- Strongly agree
- Agree
- Neutral
- Disagree**
- Strongly disagree

Are there any other growth options we should consider?

- Yes
- No

Town centre strategies

Canterbury city centre vision

The vision for Canterbury is to build its success as the key visitor and shopping destination in Kent by diversifying its offer through creative and cultural development and providing a range of commercial and leisure floorspace to meet projected growth needs and an increase in residential use.

Improving the commercial offer, intensifying and capitalising on its unique heritage assets, rich townscape, and academic institutions will encourage innovative businesses to invest in the city, stimulate activity, grow footfall and contribute to the vibrancy and vitality of the centre.

Canterbury will experience significantly reduced traffic congestion through a decisive switch towards active travel which will improve health, quality of life and the environment. Taken with a high quality public realm that integrates public art, high quality landscaping and new green infrastructure the city will be an animated, safe and attractive place.

Strengthening the city's public realm and open spaces will also reinforce the character and distinctiveness of the city's heritage, help mitigate climate change and contribute to the ecological network ensuring Canterbury is a desirable place to live, work, visit and do business.

An improved visitor experience will ensure Canterbury continues to be a flourishing visitor destination, welcoming tourists to the city and offering an attractive gateway to the wider district.

Canterbury city centre objectives

- Maintaining the city’s function as a sub-regional centre, providing and creating a wide range of town centre uses and services to grow footfall and contribute to the vibrancy and vitality of the centre
- 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
- Growing the residential population by converting space above shops and developing mixed use and residential schemes, making effective use of land to attract a variety of residents that will contribute to town centre vitality, footfall and expenditure
- Improve connectivity between different areas and visitor attractions to create a more legible town centre environment, supported by enhanced digital infrastructure
- Facilitating a significant increase in opportunities for walking, cycling active travel and sustainable transport to ease congestion and improve air quality and people’s health
- Positively exploit the city’s heritage to deliver economic, social and environmental benefits
- Improving public spaces including new public art and lighting and new green infrastructure and landscaping
- Fostering a vibrant cultural and creative offer to embed Canterbury city centre as a core attraction and the heart of community life. New festivals, events and themes to support town centre activity, attract visitors and maximise footfall

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

- Yes
- No**

It is difficult to agree without seeing specific proposals. You mention a “wide range of town centre uses” – well yes, but please don’t close down access to the market traders. The fruit and veg stalls, for example, often offer better value and more local products than the supermarkets, and their presence makes the city centre more vibrant. Improving public spaces, new green infrastructure – yes – but what does the improvement consist of? I would be dismayed to see the town centre trees cut down. Quite apart from anything else, they provide shade in hot weather and distract from some of the uglier post-war rebuilding. Beware of repeating the mistakes of urban development in the sixties & later which destroyed so much in the interests of modernisation.

Do you have any different suggestions?

See comments above.

Herne Bay vision

The vision for Herne Bay is for a thriving town with a diverse economy with a competitive core that attracts investment and employment.

The centre will have high quality public spaces and legible and attractive pedestrian and cycle links between the seafront, shopping areas, the rail station and the wider suburbs.

The seafront will be the focus of regeneration, with well designed new buildings complementing the historic environment.

The town's heritage, range of open spaces and seaside location will deliver new opportunities for shopping, community and & leisure events.

Digital working and clean energy will make Herne Bay the place of choice for residents and businesses wanting a more contemporary, greener lifestyle.

Improved connectivity to surrounding countryside and coast, including Whitstable and Canterbury will also provide healthy walking and cycling opportunities.

Herne Bay objectives

- Providing and creating a wide range of town centre uses including opportunities for job creation and creative industries that stimulate activity, grow footfall and add to the vibrancy and vitality of the centre
- The seafront will be reinvigorated through the enhancement of public spaces and the regeneration of seafront buildings – including with contemporary design – to create a dynamic and vibrant place for people to socialise and spend leisure time
- Increase residential occupancy within the town centre including making use of space above shops for residential
- Significantly improving the connectivity between the different areas of the town centre, particularly Central Parade, High Street and Mortimer Street and the railway station as well as the wider suburbs
- Opportunities for movement by foot, cycle and public transport will be maximised and we will balance the desirability and convenience of car parking in the centre with the transition to more sustainable transport modes Improving traffic flow on the road network and balancing the desirability and convenience of car parking in the centre with the transition to more sustainable transport modes
- Enhance digital infrastructure where it preserves the historic environment and support improvements to strategic infrastructure, including power and water, to the benefit of communities and businesses
- Positively exploit Herne Bay's rich heritage to develop tourism and the local economy to benefit residents, visitors and businesses
- Enhance public and open space to deliver new opportunities for shopping, community and leisure events to encourage more people to visit the town centre. New festivals, events and themes will be developed to support town centre activity and maximise footfall

Do you agree with our vision and objectives for Herne Bay?

- Yes
- No

Do you have any different suggestions? ***As a Canterbury resident I prefer not to comment on other centres.***

Whitstable vision

Whitstable will continue to be an attractive, distinctive coastal town offering a variety of independent businesses and services for residents and visitors.

Its unique blend of shops, bustling harbour and coastal heritage will continue to thrive, along with its expanding art and cultural scene.

More opportunities for walking, cycling and public transport use will help make the town centre's streets a pleasant environment for residents and visitors.

Whitstable objectives

- Providing a range of compatible uses including entrepreneurship and creative industry that reflect the character of the area, add to the vibrancy and vitality of the centre and maintain the town centre at the heart of the community it serves
- Promoting higher density development where it can be accommodated and making use of space above shops for residential
- Digital infrastructure to all new residential and business developments and provide enhanced digital infrastructure where it preserves the historic environment
- Improving the town centre environment by reducing the dominance of traffic, providing low carbon travel options including new and extended cycle and walking network and enhanced public realm
- Protect, improve and capitalise on the town's rich and distinctive heritage, culture and quality of place to enhance quality of life, support tourism and the local economy for residents, visitors and businesses

Do you agree with our vision and objectives for Whitstable?

- Yes
- No

Do you have any different suggestions?

As a Canterbury resident I prefer not to comment on other centres.

Housing and new communities

Meeting housing needs

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

What is the issue and why is it important?

Meeting the housing needs of the community means making sure there is a mix of different sized properties, different number of bedrooms and different tenures (sale or rent) available.

This could mean providing more flatted developments or homes with 1 or 2 bedrooms in town centres, while providing larger 3 or bedroom family homes in school catchment areas, or providing a different mix of the number of bedrooms in affordable homes or market homes.

What is the evidence telling us?

The Housing Needs Assessment (HNA) (2021) provides a breakdown of the different types of housing needed by our communities; for example how many family homes, smaller properties such as flats and bungalows and how many homes for rent will be needed.

The HNA identified that the greatest need is for 3 bedroom homes. Bungalows were also looked at specifically with a need of around 2,440 - 2,950 additional bungalows by 2040. The new Local Plan will set out how those needs can be met.

What came out of the consultation?

The responses identified the need for homes to be built for a variety of people in the community, from small homes for young couples to family housing, providing a mix of size, types and tenures.

There was conflicting information about priorities, with some people wanting more small homes for young people, while others wanted more bungalows for older people, and others expressed a desire for more family homes.

How should we do this?

Option HNC1A - continue current approach to allow some flexibility for developers to provide a mix of homes within a broad range

This option is based on the approach currently being used through the existing Housing Strategy.

Housing developments must provide a mix of homes within a range set out in the strategy, for example 10 - 20% should be 2 bedroom properties, 20 - 30% should be 3 bedroom properties.

Anywhere within this range will usually be acceptable, and sites can be designed to reflect these ranges, but with sufficient flexibility to allow for site specific circumstances.

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

This option would include a more detailed set of requirements for all sites to meet local needs.

Removing the range would limit flexibility for developers but should see the identified mix of homes being delivered for each site.

Different figures would be set out based on the needs identified for different parts of the district (Canterbury, Herne Bay, Whitstable and rural). For small sites, or difficult sites which provide justification, an alternative mix could be considered.

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

This option builds on Option HNC1B, but also allows for the identification of opportunity sites for specific types or tenures of homes.

These sites would be based on locational, or other, circumstances which promote the delivery of certain types or tenures of housing. For example, if there is a need for 1 bed accommodation these might be most appropriate as flatted schemes within or close by to a town centre.

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

- Option HNC1A - continue current approach to allow some flexibility for developers to provide a mix of homes within a broad range
- 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**
- 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):

Housing targets should obviously reflect local needs, hence my choice of Option HNC1B. The explanation of opportunity sites in Option HNC1C was unclear and looks like signing a blank cheque for unspecified projects.

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

.....
.....
.....
.....

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

What is the issue and why is it important?

The level of housing need identified by the government's calculations means that new greenfield sites, including some large strategic sites, will be needed to meet identified needs.

This could take various forms like satellite settlements or urban extensions, as set out in the Growth Options section.

Our current Local Plan strategy is highly focused on very large strategic sites, generally with 800+ homes.

This limits the diversity of the sites available to developers to build new homes, and might restrict the ability of Small and Medium Enterprises (SMEs) to engage effectively in the housing market in the district.

What is the evidence telling us?

The government says that a minimum of 10% of our housing needs must be met through small and medium sized sites of less than 1 hectare.

Based on the government's standard methodology, we think we'll need to provide 1,120 homes a year, of which 112 would need to come from sites smaller than 1 hectare.

Small and medium sized sites have benefits like supporting SMEs which are often local companies; they typically come with fewer major infrastructure requirements and they often have more bespoke designs.

These types of sites can be built quickly, and more emphasis on small and medium sized sites through the new Local Plan would support the acceleration of housing delivery in sustainable locations.

What came out of the consultation?

It was expressed that a variety of different sized sites would be needed, and should be supported through the Local Plan.

How should we do this?

Option HNC2A - continue current approach to small and medium sites

The current Local Plan focuses on large strategic sites, often of more than 800 homes.

Few small and medium sites are allocated in the existing Local Plan, and most developments of this size typically come forward as 'windfall' developments - sites which are not identified within the Local Plan.

The required 10% small and medium sites might still be achievable by continuing the current approach.

Option HNC2B - increase proportion of supply coming from small and medium sites through additional allocations and windfall sites

This option provides more focus on the delivery of small and medium sites, by identifying and allocating land for these types of developments, alongside the windfall approach.

This approach would allow for more proactive management of how and where sites are delivered, including by setting out clear requirements for matters such as design and infrastructure.

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

This option builds on Option HNC2B - taking a more proactive approach to identifying opportunities for small and medium sites - with additional policy support for windfall and organic growth within urban areas.

This includes things like redevelopment opportunities, encouraging the sub-division of large sites for SMEs, and opportunities for proportionate extensions to sustainable rural settlements to meet identified local needs like affordable housing.

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

- Option HNC2A - continue current approach to small and medium sites**
- Option HNC2B - Increase proportion of supply coming from small and medium sites through additional allocations and windfall sites
- Option HNC2C (preferred option) - maximise opportunities for delivery of small and medium sites to deliver new homes

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

It is difficult to assess the implications of the three options as outlined above. Given the government's proposed changes to planning legislation and the apparent willingness to remove provision for consultation and the chance to object, I would not wish to see significant changes in how sites are identified etc. There is too much uncertainty in HNC2C. Any permission to build on small sites needs to ensure that ageing infrastructure such as drains / sewers is appropriately upgraded.

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

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

What is the issue and why is it important?

Brownfield land (also known as previously developed land) is land which is, or was, occupied by a permanent structure.

It doesn't include agricultural or forestry buildings, land used for minerals extraction or waste disposal by landfill (where provision for restoration has been made), land in built-up areas like residential gardens, parks, recreation grounds and allotments, or land where the remains of the permanent structure has blended into the landscape.

Development needs such as housing, employment, community or social facilities, should be met on suitable brownfield land as far as possible; however the opportunities for brownfield redevelopment can be limited by factors like land values and land availability.

In some situations brownfield may not be appropriate for development, for example, when it is dangerous to human health or where the site supports important species which can only thrive in certain conditions

Regeneration of areas is one way to make effective use of land. By redesigning and redeveloping areas they can become more desirable, sustainable places to live, work or play; improving the health and wellbeing of our communities.

What is the evidence telling us?

National planning policies encourage us to make the best use of available suitable brownfield sites, and we have published a Brownfield Land Register which currently has 43 sites.

The current Local Plan identifies land at Chaucer Road as an opportunity site in the longer term for new housing, and a retail area in Wincheap for regeneration.

There may be further opportunities - over the period of the new Local Plan to 2040 - to renew and regenerate areas across the district, such as council housing estates and underused, derelict brownfield sites.

What came out of the consultation?

Some people said that only brownfield land should be built on, some said brownfield should be built on first then greenfield if there is a need for more land.

Others said that brownfield land can be highly important to certain species, so should not always be lost to development.

How should we do this?

Option HNC3A - continue with the current approach to brownfield sites

This would mean continuing to encourage development on previously developed land in suitable locations for new development in the first instance, rather than locating development on greenfield land.

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

This approach would build on Option HNC3A, exploring further opportunities for regeneration through the new Local Plan.

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

- Option HNC3A - continue with the current approach to brownfield sites
- Option HNC3B (preferred option) - maximise opportunities for delivery of suitable brownfield and regeneration developments**

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

It makes sense to use brownfield sites first and regenerate areas which have become derelict, but it will obviously depend on individual sites.

If you think there's a better option for brownfield and regeneration land, let us know:

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

What is the issue and why is it important?

Development should make efficient use of land to minimise the amount of countryside and agricultural land that is built on. This means in some locations, like town centres and near to transport hubs, higher densities may be appropriate.

However, it is not necessarily the case that one density will be appropriate across the entire district. In some areas, lower densities will be appropriate to make sure that new development respects the character, landscape or historic nature of the area.

What is the evidence telling us?

Recent changes to the national planning policies highlight the importance government places on using land efficiently, particularly where there is an anticipated shortage of land to meet an area's development needs.

Developments need to make optimal use of the potential of each site and avoid low density schemes unless there are specific reasons for this.

The density of developments must be linked to good design and creating communities, making sure that proposals provide an appropriate mix of homes compatible with the local area, and helping deliver smaller or higher densities in the appropriate locations.

What came out of the consultation?

There were mixed views about the density of developments.

Some people encouraged high densities around transport nodes, others commented that it was preferable to build on greenfield land than to increase the densities of development within the urban areas, and some felt that new developments are designed too densely.

How should we do this?

Option HNC4A - continue current approach of influencing site density through good design

This option continues the approach in the current Local Plan, where it's influenced through good design and must be considered in its local context on a site-by-site basis.

Option HNC4B - identify a minimum density for the district as a whole, and continue the current approach of influencing site density through good design

This option would reflect the national focus on the need to make efficient use of land, by identifying a minimum density for the district as a whole.

This will not prevent developments being able to build out at a higher density where appropriate, influenced by the local context and good design.

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

This option would build on Option HNC4B by setting out appropriate densities for site allocations or proposals to meet in different parts of the district.

This approach would reflect the different characteristics of areas so for example, there would be higher density development required on sites at, or close to, town centres, than for sites within the rural areas.

This would reflect the national focus on the need to make efficient use of land, while still enabling proposals to be influenced by local context and influenced by good design.

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

- Option HNC4A - continue current approach of influencing site density through good design**
- Option HNC4B - identify a minimum density for the district as a whole, and continue the current approach of influencing site density through good design
- 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):

Option HNC4A sounds sensible. Option HNC4B looks as if it could be potentially indiscriminate - it all depends on the actual minimum set. For HNC4C, what might the higher densities required for particular sites mean in practice?

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

.....

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

What is the issue and why is it important?

Outside of the city of Canterbury and the coastal towns of Herne Bay and Whitstable, a large proportion of the district is made up of the rural areas, home to many thriving villages and small hamlets of varying sizes and characters.

New housing developments at these rural settlements can provide homes for local people, including affordable housing, and can help to sustain local services and facilities.

The current Local Plan focuses any rural growth at the larger 'service' villages which have the most facilities; however many of the district's rural settlements have seen very limited development in recent years.

This places pressure on existing housing stock, affecting the ability of young people in the area to find housing locally, and can also make it difficult for villages to retain services such as pubs or shops.

National planning policies set out a presumption against new isolated homes in the countryside, unless specific circumstances apply.

The new Local Plan will need to set out an approach which allows our rural communities to grow and thrive, while making sure that new development is proportionate and sensitive to the character of our villages.

What is the evidence telling us?

The existing Local Plan generally limits rural housing development outside of the allocated sites, like at Sturry and Hersden. Development on the edge of villages is largely restricted and there are restrictions too on 'infill' housing developments, within the built form of smaller settlements.

Although this approach prevents the rapid expansion or overdevelopment of many of our rural settlements and protects their existing character, it severely limits opportunities for the provision of homes in most of our villages. There is a clear need for additional affordable housing across the district, including in the rural areas.

The Rural Settlement Study (2020) updates our understanding of the relative sustainability of each of the district's rural settlements.

It shows that many of our villages - the 'rural service centres' - have a comprehensive range of services and facilities which allow residents to meet their day-to-day needs without needing to travel into the urban areas.

The study also looks at the relationship between these rural service centres and smaller villages and hamlets nearby.

It suggests that there are various clusters of rural settlements across the district, each centred on a rural service centre, allowing residents in nearby smaller settlements to access a range of facilities without the need to travel into the urban areas. The identified clusters are:

- Sturry and Hersden
- Chartham
- Bridge
- Littlebourne
- Blean

Within each of these clusters are smaller settlements, categorised as local centres, villages and hamlets, according to the level of services available.

Understanding the relationships and networks between settlements is helpful because national planning policies encourage us to think about whether housing development in smaller rural settlements can help to sustain services and facilities in other nearby settlements.

What came out of the consultation?

Some people commented that development should be restricted in the rural areas to protect the character of settlements and their surrounding landscapes.

Many settlements are located within the Kent Downs Area Of Outstanding Natural Beauty, where major housing development is restricted by national planning policies. However, many people recognised that house prices in the villages mean that housing is unaffordable for many people, including young people, and that this issue needs to be addressed.

There was some support for providing more housing in rural areas, and in particular where this helps to meet local needs and enables young people to find housing in the villages.

It was also felt by some that proportionate housing growth should be accommodated at the villages to help to sustain services and facilities which would, in turn, benefit existing residents.

How should we do this?

Option HNC5A - keep existing approach to rural housing development

This option would keep the current approach which focuses growth only on the more sustainable rural settlements through specific allocations.

It would aim to locate any new rural homes at the settlements with the most services, and would protect the character of other smaller settlements by preventing their expansion and limiting opportunities for infill developments.

Option HNC5B - focus rural housing development at the rural service centres, and support infill development at other settlements within village boundaries

This option would aim to provide opportunities for the rural service centres to grow, and to continue to be the focus for rural housing development. This would include identifying specific sites for development with the design principles set through the Local Plan.

Development at smaller settlements would be permitted where this is within the built form or village boundary of the settlement, and is acceptable in terms of design and other planning considerations.

This approach would support the delivery of affordable housing in the rural areas by focusing on medium sized developments which would normally deliver a proportion of affordable homes as part of the development.

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

This option would aim to provide opportunities for the rural service centres, local centres and villages to grow based on their existing size and character.

This would include identifying specific sites for development, setting out design principles, and things like the provision of community facilities and open spaces. Any extensions to settlements would need to be of a sufficient size so that it can provide affordable housing (normally 11+ homes).

Infill developments would also be supported within village boundaries where they are acceptable in terms of design and other planning considerations.

This approach would aim to provide affordable housing in a range of settlements across the district, and more homes would help to sustain existing and potentially additional services in the rural areas, recognising that developments in smaller settlements can support services and facilities in larger settlements nearby.

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

- Option HNC5A - continue existing approach to rural housing development

- ❑ Option HNC5B - focus rural housing development at the rural service centres, and support infill development at other settlements within village boundaries
- ❑ 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).

No option selected.

Affordable housing is clearly a priority, & for residents rather than second home owners.

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

.....

Community infrastructure and design

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

What is the issue and why is it important?

Sustainable communities are places where people want to live and work, now and in the future.

It is important that new communities have a mix of homes, accessible employment opportunities, facilities such as schools, healthcare and shops, and a clean, safe environment. Communities also need opportunities for active travel, access to public transport and open spaces where they can relax.

The Local Plan can influence the sustainability of communities through policies which can support social and community infrastructure.

This includes services and facilities which communities will rely on to meet day-to-day needs; like primary schools, shops and community meeting spaces, and open spaces.

For larger developments, providing jobs in new communities, like by using flexible or co-working space, can further enhance the sustainability of communities and reduce the need to travel.

What is the evidence telling us?

National planning policies make it clear that Local Plans should support strong, vibrant and healthy communities to reflect the diverse needs of existing and future generations.

This should be done by promoting a well designed and safe built environment to contribute to a high quality of life, with accessible services and open spaces that support communities' health, social and cultural wellbeing.

Creating highly sustainable communities can:

- improve the quality of life for residents
- reduce environmental impacts
- promote healthy active communities
- strengthen community cohesion

In the last year, COVID-19 has highlighted the importance for communities to have enough access to services such as local shops and open spaces without needing to travel.

What came out of the consultation?

Many people commented on the importance of providing essential services such as shops, medical centres, schools and community facilities; alongside new developments to support sustainable communities.

Others highlighted the need for services to be walkable for communities to reduce the need to travel.

There was also support for new developments to include areas of public open space at their core, and connecting wildlife corridors to support biodiversity and create healthy communities.

Some suggested community hubs could offer co-working spaces in light of COVID-19, as many transitioned to work from home.

How should we do this?

Option HNC6A - keep the existing approach to supporting sustainable living in new communities

The current approach needs strategic development sites to incorporate social infrastructure and community facilities, based on garden city principles, like open space, recreational and cultural facilities, and shopping.

This approach provides a set of guiding principles for the very largest sites, but allows significant flexibility on how these principles are then delivered at the planning application stage, where more information is normally available.

Option HNC6B - set clear requirements for new or improved social and community infrastructure to be delivered as part of strategic developments

This option would set specific requirements for the delivery of social infrastructure and community facilities at strategic development sites within the Local Plan.

These would normally be provided within the site, although there may be some cases where it is preferable to make provision off-site or by improving or expanding existing facilities.

For example, this approach could mean that new developments of 100 or more homes have to provide a neighbourhood or local centre with a shop, and sites over 500 new homes have to provide a new community hub, which could support a co-working area and other community facilities.

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

This option would build on Option HNC6B to broaden and step up the requirements for large (but non-strategic) developments.

For example, it would make sure that proposals of 50 or more homes would need to show that key services, such as primary schools and shops, can be accessed within 15 minutes walking or cycling times.

How can we support sustainable living in new communities?

- Option HNC6A - keep the existing approach to supporting sustainable living in new communities
- Option HNC6B - set clear requirements for new or improved social and community infrastructure to be delivered as part of strategic developments
- 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):

I have not commented here for lack of time. Please see comments in later sections.

If you think there's a better option for supporting sustainable living, let us know:

.....

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

What is the issue and why is it important?

Design influences how we feel, and how we experience the places where we live, work and spend our leisure time.

There are a number of design tools we can consider as part of the new Local Plan, which would provide different approaches to securing high quality design from new developments.

Design codes can help to proactively plan for better design of a site or area. They are a visual and descriptive set of rules which can set out the design requirements in relation to:

- the layout of new development, including street pattern
- how landscaping should be approached including the importance of streets being tree-lined
- the factors to be considered when determining whether façades of buildings are of sufficiently high quality
- the environmental performance of places and buildings ensuring they contribute to net zero targets
- how developments take account of local architecture, heritage and materials

A masterplan sets the vision, objectives and implementation strategy for a development. It is likely to include a range of information, such as:

- the site context - where the site is, what land uses and facilities are currently on the site, next to it or nearby
- any service information, such as water, electricity, and gas
- the landscape strategy, taking account of existing natural features and new structural elements
- the amount and position of open space provision
- the number of homes and other uses
- the points of access and connection to the wider street network
- the broad position of the primary and secondary streets (but not local streets)
- the position of the local centre if relevant
- the area types that will apply to different parts of the site (which will reference rules on density, height, street building line and so on)

Design and Access statements submitted at the planning application stage help to make sure that development proposals are based on a thorough design process with a sustainable approach to access.

What is the evidence telling us?

Well designed places influence the experiences we have in the places where we live, work and spend our leisure time.

The National Design Guide highlights that well designed places have been shown to benefit health and wellbeing, feelings of safety, security, inclusion and belonging, and sense of community cohesion.

What came out of the consultation?

Stakeholders made it clear they want to see high quality design across the district in order to create healthier communities and contribute positively to the council's objectives for climate change.

The consultation and conference evidence supports the use of master plans for new developments, and people suggested that the community should be more involved in the process.

How should we do this?

Option HNC7A - keep the current criteria based approach to design

This option sets out design criteria to be addressed by applicants - for all types of developments including commercial or office development - and means that strategic sites at planning application stage must have a master plan.

For the very largest sites, this should identify through the planning application how the site fits into the wider surroundings, physical and social infrastructure provision, phasing and timing, and detailed design proposals.

Option HNC7B - use the new National Design Guide and National Model Design Code

This option would use the National Design Guide and the National Model Design Code to provide a high level overarching framework for all types of development.

This would be used to help prepare more detailed design guides and codes for sites or areas, which would be developed outside of the Local Plan.

Option HNC7C (preferred option) - embed master plans and design requirements for strategic development sites in 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

This option reflects a more proactive and upfront approach to the design and delivery of key strategic development sites, providing more certainty and clarity on how sites will be designed and built out through the Local Plan itself.

Design criteria would remain applicable for other developments; such as commercial, office or smaller housing developments, but there may be circumstances where it would be beneficial for tools like design codes to be developed outside of the Local Plan - for example, through neighbourhood plans or for the opportunity of regeneration sites.

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

- Option HNC7A - keep current criteria based approach to design
- Option HNC7B - use the new National Design Guide and National Model Design Code

- ❑ 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):

No option selected – I don't know the National Design Guide etc. A pleasant, attractive built environment is crucial for quality of life; tree-lined streets – yes, shade, environmental role, wildlife etc, design which respects local architecture – yes, definitely, please avoid the generic dull could-be-any-town in England look.

If you think there's a better option for high quality design, let us know:

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

What is the issue and why is it important?

Heating and powering buildings currently accounts for 40% of the UK's total energy usage, and this is a similar proportion at a Canterbury district level. It is government policy to set minimum energy efficiency standards for buildings to put the nation on the right path to achieve the net zero target by 2050.

This covers a range of issues related to low carbon and energy efficient housing; including new homes, changes to existing homes, water efficiency and renewable energy.

Alongside the need to make buildings that use much less energy, there are other important sustainability goals to make the built environment good for people and for natural resources. Buildings need to be resilient to overheating and prepared for heavier extreme rainfall events.

As well as new construction, around 7,000 homes in the district undergo major building work each year. Projects to improve homes are the ideal time to improve energy efficiency, reduce carbon emissions and cut energy costs.

It is more cost effective to make these changes at the same time, and so the new Local Plan will need to think about how best to support the transition of all homes in the district to net zero by 2050.

Retrofitting existing buildings to make them more energy efficient is critical for the district to hit 2050 net-zero carbon targets. The Local Plan can help to achieve this target by applying tighter controls to planning applications for changes to existing homes.

Currently there is no requirement for changes under 1000sqm to achieve energy efficiency standards. The Local Plan will need to think about how existing buildings can reach net zero.

Energy plans are one method which can be used to show how development proposals will meet carbon emissions targets. A development-level energy plan will set out how the energy requirements for space heating, hot water and electricity will be met, with the objective of generating the lowest possible operational carbon emissions.

Larger developments might have opportunities to deliver integrated community-level solutions like heat or energy networks.

Other methods for getting effective and timely emissions reductions include setting local energy and carbon emissions standards for new construction, and modifications to existing buildings.

What is the evidence telling us?

Retrospectively changing and adapting the fabric and infrastructure of existing buildings to address energy, climate change and sustainability issues is expensive, disruptive and has not been happening at the pace needed.

The development of new standards for buildings at national level through the Future Homes Standard provides clear evidence for setting standards for designing and constructing buildings that have high thermal performance and are net zero ready.

This means that homes will be constructed to high thermal standards and that further retrofit work to transform them to zero carbon homes would be minimised.

London Borough planning authorities have implemented net zero emissions standards for new developments since 2016.

Best practice guidance from the Royal Institute of British Architects is to set the sustainability outcomes upfront in the project, and this is assisted by clear requirements through the Local Plan.

What came out of the consultation?

Stakeholders made it clear that the energy and sustainability of standards for new buildings and major changes to existing buildings should be set at the highest possible level.

A minority of people wanted to stick to minimum standards.

How should we do this for new homes?

Option HNC8A - keep current approach but with indicative net zero

This option would keep the current Local Plan approach, which does not set any particular local building standards for energy or sustainability, relying instead on national standards.

The council would continue to encourage developers to aim for higher standards to indicate how net zero might be achieved, but this wouldn't be mandatory.

Option HNC8B - early introduction of Future Homes Standard

This option would introduce the need for new buildings design to meet the Future Homes and Buildings Standards from 2023, two years earlier than its planned introduction in 2025.

The Future Homes Standard will make sure that an average home will produce at least 75% lower operational CO₂ emissions than one built to current energy efficiency requirements, and that homes built under the Future Homes Standard will be zero carbon ready.

This would accelerate the transition to better homes, as well as leading to a direct reduction in emissions at a district level, and greater resilience for homes built in the early years of the new Local Plan.

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

This option would incorporate new standards into the new Local Plan at full net zero operational emissions.

The method for determining this at the design stage would need to be set out using an agreed approach, like the emissions rate in the Standard Assessment Procedure or Passive House design, and then checked at the completion stage through the Energy Performance Certificate or Passive House Certification.

This option would also include a method for payment for any developments failing to meet the standard using an agreed carbon price which would contribute to a district decarbonisation fund.

How should we do this for new homes?

- Option HNC8A - keep current approach but with indicative net zero
- Option HNC8B - early introduction of Future Homes Standard
- Option HNC8C - (preferred option) all new homes delivered to net zero

Lack of time to comment – please see later sections

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:

.....
.....
.....
.....

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

Option HNC8D - require planning applications to have an energy plan for improvements to energy performance

This option would encourage people making adaptations and doing work that need planning permission to think about opportunities, through an energy plan, to improve the performance of the overall building.

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

Currently a building change that needs planning permission, like a loft conversion or extension, doesn't need higher energy performance unless it is over 1,000 sqm.

This option would mean applications would need to change a building to achieve the latest standards of building regulation energy efficiency, and would also need an energy plan to look at opportunities to improve the performance of the overall building.

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

This option would build on Option HNC8E, to set local standards for energy performance and sustainability as well as making sure applications have an energy plan for improvements to energy performance.

For example, this could mean that an existing home which needs planning permission for an extension would need to lower operational emissions of the whole property by improving the insulation, ventilation of the existing building and changing the primary heating system from a gas boiler to a heat pump.

This approach would lead to a more rapid improvement of the district's existing building stock to reduce energy use and move towards net zero carbon emissions goals.

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

- Option HNC8D – require planning applications to have an energy plan for improvements to energy performance
- 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
- 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

Lack of time to comment – please see later sections.

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:

.....
.....
.....
.....

Improving water efficiency

Issue HNC8. How should we improve water efficiency?

What is the issue and why is it important?

The south east of England has some of the lowest rainfall in the UK and is classed as a 'water stressed' area by the Environment Agency.

Climate change forecasting shows that more serious water shortages are expected in the next 20 years, affecting the balance between water supply and demand. Without significant innovation and increased water efficiency, we will need to rely on expensive water transfers and new supply options.

What is the evidence telling us?

National planning policies encourage Local Plans to take a proactive approach to mitigating and adapting to climate change, which includes thinking about the long term implications for water supply.

In this context, it is important we achieve higher water efficiency standards of 110 litres per person per day for all developments.

With the move towards ever greater efficiency, and the scope through new technologies to integrate water recycling and management systems and green infrastructure - for example with grey water systems - the new Local Plan will need to think about whether higher efficiency targets should be introduced for the very large or strategic developments sites.

What came out of the consultation?

South East Water explained how the water supply in this area is reliant on the groundwater that also feeds the River Stour.

The future resilience of this resource is vulnerable to increasing demand, predicted drier winters and reduced recharge due to land management practices and new development.

They said that the new Local Plan offers a strong opportunity to lock in water efficiency, resilience and adaptivity into development.

Southern Water also gave their support for thinking about how to reduce water consumption and manage water supply.

How should we do this?

Option HNC8G - keep current approach to water efficiency

The current approach encourages developments to minimise water use as far as possible by incorporating appropriate water efficiency and water recycling measures.

In new homes, we ask for a required level of 110 litres maximum daily allowable usage per person, but there are no requirements for developments to show that this standard is achieved.

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

This option would strengthen the existing approach that all residential developments show through the planning application process that the higher water efficiency standard of 110 litres per person per day (including external water use) will be achieved.

All developments would need to show how water efficiency and water reuse measures have been maximised.

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

This option would build on Option HNC8H by requiring large or strategic sites to show water efficiency standards that exceed the current building regulations, to achieve a maximum use of 90 litres per person per day of potable water (including external water use).

This would expect large or strategic sites to show water efficiency and demand management measures to be implemented to minimise water use and maximise the recycling and reuse of water resources, using integrated water management solutions. We would also welcome views on whether water efficiency levels higher than this are achievable.

How should we improve water efficiency?

- Option HNC8G - continue with the current approach to water efficiency
- Option HNC8H - require proposals for new homes to show the higher water efficiency standard of 110 litres per person per day
- 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

Tell us why you chose this option:

I have not commented on this for lack of time. Please see comments on later sections.

.....
.....
.....
.....

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

.....
.....
.....
.....

Incorporating renewable energy into new developments

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

What is the issue and why is it important?

As well as the need to reduce the energy demand within the new and existing commercial and housing developments through energy efficiency measures, there is a need to increase renewable energy generation to the maximum potential to reduce carbon emissions and the causes of climate change.

What is the evidence telling us?

Within the built environment, solar photovoltaic panels that generate electricity are a tried and tested renewable energy technology. Solar thermal panels that produce hot water are also effective.

Canterbury district has nearly the highest solar energy potential in the UK. Although both solar technologies are well established and cost effective measures to reduce carbon emissions, the uptake within the district is far below potential and needs to accelerate in order to meet net zero goals.

What came out of the consultation?

Stakeholders are very supportive of an approach to maximise the use of rooftop solar panels for both new and existing construction and for all types of buildings, with the exception of some concerns about some heritage buildings.

How should we do this?

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

This option would continue to encourage new development in the district to include proportionate measures to reduce carbon and greenhouse gas emissions.

The current policy doesn't insist on renewable energy generation, but national policy encourages 10% of the energy demand to be met by onsite renewable energy for developments over 10 properties.

Option HNC8K - (preferred option) require all new large or strategic developments to show decentralised energy supply

This option would mean all new developments have to comply with requirements for decentralised energy supply; maximising the renewable energy generation at the development site, unless they can show that it's not feasible, for example because of the type of development or its design.

This will require applications to look at landform, layout, building orientation, massing and landscaping to minimise energy consumption and integrate renewable energy generation to the development.

How will we incorporate renewable energy into new developments?

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

- ❑ Option HNC8K - (preferred option) require all new large or strategic developments to show decentralised energy supply

Tell us why you chose this option:

I have not commented on this for lack of time. Please see comments on later sections.

.....
.....
.....
.....

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

.....
.....
.....
.....

Specialist housing need

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

What is the issue and why is it important?

People are living longer, which means that the numbers of older people in the population is increasing. Older people can have specific housing needs and require a choice of accommodation to suit their changing needs; supporting them to live independently for longer and stay connected with their communities.

The health and lifestyles of older people can differ greatly, and so there are a range different accommodation products being offered by the market:

- independent living: often in adapted existing homes, or bungalows for those less able to get about
- age-restricted general market housing: generally for people aged 55 and over and the active elderly. These developments often include some shared amenities such as communal gardens, but would not include support or care services
- retirement living or sheltered housing: usually in purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. Care services are not normally provided, however there is some support such as 24 hour on-site assistance (alarm) and a warden or house manager to support residents to live independently
- extra care housing or housing-with-care: typically purpose-built or adapted flats or bungalows with a medium to high level of care available. Residents are able to live independently but, if required, there is 24 hour access to support services and staff, and meals are provided. There are extensive communal areas, such as space to socialise or a wellbeing centre. These developments can be known as retirement communities or villages, as the intention is for residents to benefit from varying levels of care as time progresses

- residential care homes and nursing homes (including dementia care homes): usually individual rooms within a residential building providing a high level of care meeting all activities of daily living

What is the evidence telling us?

With an aging population, it is anticipated that a variety of accommodation will be required to meet the needs for specialist older persons housing.

The HNA provides a breakdown of the scale and type of accommodation needed by older people, including around 1,150 additional care home bedspace with about 26% providing nursing support, around 576 age exclusive housing and around 1,732 specialist units (this includes sheltered housing and extra care housing).

What came out of the consultation?

Many people commented that there was not enough housing for older people in the district, and this was an increasing concern.

It was also felt that housing for older people should be appropriately located so that they can access local facilities like community halls, post offices and shops.

How should we do this?

Option HNC9A - all large or strategic sites to provide a proportion of the site for older persons' housing (for example 5%)

This option would mean that larger or strategic sites would set aside a proportion of their site for older persons' accommodation.

The type would be directed by the HNA so that communities are supported by the appropriate type of accommodation. Therefore, these sites would support a mix of affordable and market homes, along with older persons accommodation, so that older persons' housing is effectively integrated in new communities.

Option HNC9B - allocate specific sites for the delivery of older persons' housing

This option would identify specific sites for the delivery of bespoke older persons' accommodation within the Local Plan, where suitable sites are identified.

Given the scale of the need identified in the HNA it may not be possible to meet the needs in full with this approach.

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

This option would look to maximise the availability of land for older persons' housing developments, taking opportunities to allocate specific sites where available, and also setting requirements for large or strategic sites to make sure that some older persons' accommodation came forward within these large new communities.

How should we approach providing housing for older people?

- Option HNC9A - all large or strategic sites to provide a proportion of the site for older persons' housing (for example 5%)
- Option HNC9B - allocate specific sites for the delivery of older persons' housing
- 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):

I have not commented on this for lack of time. Please see comments on later sections.

If you think there's a better option for housing for older people, let us know:

.....
.....

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

What is the issue and why is it important?

Buildings and places should be designed to meet the highest standards practicable for access and inclusion. An inclusive environment is one which is easy to use and access for all, and homes will be adaptable over time to meet changing needs. 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.

Inclusive flexible design should futureproof developments to make sure that they are accessible to all sections of the community, and homes designed so that they can adapt with the changing needs of our aging population.

What is the evidence telling us?

The new Local Plan will need to reflect the housing needs for different groups within the community, including people with disabilities and older people. Development should be designed to be accessible and inclusive for these groups within the community, now and in the future.

National planning policies allow us to set local standards for the provision of adapted homes, reflecting identified local needs, based on the categories set out within Building Regulations. This means we can set requirements for the provision of adapted properties through the Local Plan, such as:

- M4(2): Accessible and adaptable properties - new homes make reasonable provision for most people to access the property and have some features to make them suitable for older people and individuals with reduced mobility
- M4(3): Wheelchair user properties - new homes provide for a wheelchair user to live in the property, to use the outdoor space, communal facilities and parking

The HNA sets out that we will need an additional 2,200 homes to have some form of adaptation by 2040. Although most of this need is for M4 (2) standards, around 700 - 1,000 people will need homes built to M4 (3) standards by 2040.

However, most of this need for wheelchair user properties is in the older age groups, including care home residents.

What came out of the consultation?

The consultation highlighted that people thought more engagement was needed with people with disabilities to find solutions for greater access, and that more wheelchair accessible homes should be built to support the needs of the community.

How should we do this?

Option HNC10A - continue current approach for 20% of new properties to be built to M4 (2) standards on major developments and strategic sites

This option would continue the current approach so that major developments (such as those of 11 or more properties) and strategic sites would need to provide 20% of new properties built to M4 (2) standards.

Option HNC10B - make sure that all new properties are built to a minimum of M4 (2) standards, and encourage M4 (3) standards

This option would make sure that all new homes are built to a minimum of M4 (2) standards. This would go beyond the quantitative needs and could have impacts on viability, but would give equal access to all new homes for a greater proportion of our community. M4 (3): Wheelchair users standard would be encouraged but not specifically required.

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

This option would provide a mix of homes of M4 (2) and M4 (3) standards which would reflect the needs identified within the HNA.

By requiring some new properties to be built to M4 (3) standards, this would make sure that a proportion are built to be accessible for wheelchair users, which is not a requirement in the current Local Plan. Where appropriate, the 5% M4 (3) standards would generally be directed towards older person accommodation in the first instance.

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

- Option HNC10A - continue current approach for 20% of new properties to be built to M4 (2) standards on major developments and strategic sites
- Option HNC10B - make sure that all new properties are built to a minimum of M4 (2) standards, and encourage M4 (3) standards
- 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):

I have not commented on this for lack of time. Please see comments on later sections.

If you think there's a better option for disability friendly homes, let us know:

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

What is the issue and why is it important?

Our district supports a large student population, with four universities: University of Kent, Canterbury Christ Church University, University for the Creative Arts, and Girme American University. Plus there are several further education establishments like Canterbury College and CATS College Canterbury.

Most students need accommodation in the local area and in easy reach of their academic spaces; accessible by walking, cycling or public transport. Although some students will live at home with their families, most will meet their accommodation needs through purpose built accommodation or shared houses - known as houses in multiple occupation (HMOs).

Not all students live the entire year within our district, but given the scale of the student population, the location and design of student accommodation can have a significant impact on local areas and communities.

The existing Local Plan includes a policy restricting the proportion of HMOs within the residential areas of Canterbury to manage the balance of students and residents within these areas. The HMO policy limits the number of residential properties which are converted into HMOs to not exceed 10% within a 100m radius.

Although we do not currently have any evidence that this requires changing, this will be kept under review as we progress the Local Plan.

What is the evidence telling us?

The number of students enrolled at local universities has increased substantially since 2001, with an estimated 30,000 students now enrolled at three campuses in the district. Around 24,300 of these are full-time students, a significant increase on the 2011 Census count of 18,354.

Our district has one of the highest ratios of students to permanent residents in England, at 16.4%, compared to a national average of 6%.

The number of purpose-built student accommodation (PBSA) bedspace is estimated at 8,850, meaning that approximately 55% of all students who move to Canterbury to study can be accommodated in this type of housing.

The recent growth in PBSA now means that there are 1.9 full-time students for each PBSA bedspace. This ratio has changed significantly in recent years - it was 3.6 students for each bedspace in the 2011 Census.

The University of Kent and Christ Church University have both published ambitious master plans for their campuses, designed to consolidate and expand their capacity for teaching and research.

The challenges for our universities as a result of COVID-19 have been, and continue to be, unprecedented. Over the past year they have radically changed how they operate, providing almost exclusively online services to students.

The UK's exit from the European Union will also affect access to important European research funds, and might affect the recruitment of students from overseas, particularly from the EU. This has the potential to impact the proportion of overseas students coming to the district to study, in particular for the University of Kent.

However, between 2003–2012 there were high levels of births across the UK meaning the number of young adults considering entry to higher education is projected to increase. This may help to offset some of the future challenges.

With the expectation that academic spaces will grow, supporting a larger student population, more accommodation will be needed. The HNA (2021) has provided some guidance on the accommodation needs of the students over the period of the new Local Plan.

What came out of the consultation?

Some people raised concerns about the high numbers of purpose built accommodation developments and HMOs for students within the district. However, it was also mentioned that more purpose built accommodation would free up existing housing stock for local residents. A solution of prioritising disused student accommodation as affordable housing was also suggested.

It was also mentioned that there is a level of uncertainty around the number of students who will physically travel to university, and therefore need accommodation, in the future due to the impacts of COVID-19. There may be a change to more online learning, as has been the case over the last year.

How should we do this?

Option HNC11A - keep current approach to purpose built student accommodation

The current approach provides significant flexibility in terms of how and where purpose built accommodation can be delivered.

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

This option would look to restrict the potential locations for new purpose built accommodation to areas in, or in close proximity to, campus.

As mentioned above, many students rely on public transport and walking, so having student accommodation close to the campus is likely to be preferable for students, although this approach might limit the availability of suitable land to deliver new accommodation.

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

This option would make sure that new student accommodation was provided in close proximity to campus. However, while some further and higher education institutions may have space within their campus to support the accommodation requirements of all their students, this might not be applicable for every institution.

In cases where there is no appropriate location on or near the campus, the applicant would have to show why that is the case and how the proposed site is appropriate for criteria like public transport accessibility.

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

- Option HNC11A - keep current approach to purpose built student accommodation
- Option HNC11B - provide purpose built student accommodation only on or near campus, for example within a 5-10 minute walk of the campus

- ❑ 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

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

I have not commented on this for lack of time. Please see comments on later sections.

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

.....

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

What is the issue and why is it important?

It is important that we plan positively to meet the housing needs of gypsies and travellers, and travelling showpeople. Gypsies and travellers are defined through the planning system as people of nomadic (wandering) habit of life, whatever their race or origin. Travelling showpeople are defined as members of a group organised for the purposes of holding fairs, circuses or shows. Meeting the housing needs of these groups could be through seasonal, temporary or permanent use of land.

National planning policies set out that Local Plans should assess the needs of gypsies and travellers and travelling show people, and set a target to meet that need. Local Plans can meet an identified need by identifying land or by setting criteria to assess planning applications against.

The current Local Plan sets out criteria for assessing gypsy and traveller planning applications, but does not include any allocated sites for these uses.

What is the evidence telling us?

The 2018 Gypsy and Traveller Accommodation Assessment (GTAA) set out a five year supply requirement (2017/18 - 2021/22) of 17 pitches, and a longer term need (2017/18 - 2036/37) of 29 pitches for gypsy and travellers. There was no identified need for travelling show people.

Completion data from 2017/18 - 2019/20 showed delivery of 14 pitches over the last three years. A further 9 pitches have been granted planning permission, providing supply for future years. We currently have a 5 year Gypsy and Travellers position of 6.96 years.

The HNA (2021) builds on the 2018 GTAA and identifies that there is a need for 20 pitches for gypsies and travellers, and no identified need for travelling showpeople between 2020-2040.

What came out of the consultation?

The need for suitable sites was identified as an issue through the consultation, and some people commented that more gypsy and travellers sites are needed.

How should we do this?

Option HNC12A - keep current approach to meeting gypsy and traveller housing needs

This option continues the current responsive approach to the changing needs of the gypsy and travellers within our community. New sites or extensions to existing sites would be needed to meet a set of criteria similar to that already in use.

Option HNC12B - allocate new pitches (either as new sites or extensions to existing sites) to meet gypsy and traveller housing needs

This option would allocate the number of pitches required to meet our district's identified need for the entire Local Plan period (until 2040).

This would not allow for a dynamic response to changes, and windfall sites would have a high criteria to reach to be considered appropriate as the need would be met elsewhere.

Option HNC12C (preferred option) - keep current approach and take opportunities through the Local Plan to allocate new pitches where suitable sites are identified

This option would continue the current responsive approach to the changing needs of the gypsy and travellers within our community.

New sites or extensions to existing sites would be needed to meet a criteria similar to that already in use. However, if they are identified through the Local Plan process, they could be allocated towards the identified needs - providing a positive and flexible approach for those seeking gypsy and traveller accommodation.

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**

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:

.....

.....

.....

.....

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

What is the issue and why is it important?

Self and custom-builds are typically projects where an individual or family acquires a piece of land on which they build a home, designed to their specific requirements, that they then live in.

This approach allows individuals to design their own home to suit their lifestyle and budget, instead of buying an already constructed home.

The current Local Plan does not identify specific requirements for self and custom-build housing, however these homes are being delivered as 'windfall' developments. The new Local Plan will need to set out a positive strategy for delivering self and custom-built homes to support high quality, sustainable designs, and to widen the choice for those looking to pursue this option for themselves.

What is the evidence telling us?

We keep a Self Build and Custom Housebuilding register to monitor the demand for people who want to build their own homes in the district. As of April 2021, there were 31 entries on the register, of which 22 had a local connection to the district.

Using the register, the HNA (2021) identified that the demand for self-build housing is less important when considered against the overall housing need figure; the type and size of housing requirement should be considered in the overall property mix.

What came out of the consultation?

Many people supported different ways of providing housing, with greater flexibility, including providing a blend of market properties and self build plots, and considering using council owned land to provide plots for self and custom-build housing developments.

How should we do this?

Option HNC13A - all large or strategic sites to provide a proportion of plots for self and custom-built homes (for example 5%)

This option would mean that larger or strategic sites will set aside a proportion of their site for self and custom-built homes. This will mean the larger strategic sites have a mix of affordable, market and self and custom-built homes, and therefore broaden the different types of housing needs being met through these sites.

Option HNC13B - allocate specific small sites (up to 10 units) for the delivery of self and custom-build housing

This option would allocate small sites (for example up to 10 units) specifically for self and custom-built homes.

This could provide parcels of land for the construction of bespoke homes; however the effectiveness of this approach might be limited by the opportunities available to deliver this type of housing on suitable sites.

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

This option would look to maximise the availability of land for self and custom-built homes, taking opportunities to allocate specific sites where available, and also setting requirements for large or strategic sites to make sure that some building plots came forward within these large new communities.

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

- Option HNC13A - all large or strategic sites to provide a proportion of plots for self and custom-built homes (for example 5%)
- Option HNC13B - allocate specific small sites (up to 10 units) for the delivery of self and custom-build housing
- 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

Tell us why you chose this option (self and custom build):

I have not commented on this for lack of time. Please see comments on later sections.

If you think there's a better option for self or custom build, let us know:

Delivering infrastructure to support growth

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

What is the issue and why is it important?

The provision of strategic infrastructure; such as schools, hospitals and broadband connectivity, is critical for supporting population and housing growth in our district. Infrastructure brings communities together and improves people's daily lives, from meeting residents' water and energy needs to making sure that there is good access to healthcare and school places.

Strategic infrastructure also underpins the economy of the district. Well-planned, high quality infrastructure is a major factor for companies in determining where to locate and expand.

We will need to work collaboratively with key infrastructure providers, to align with their investment strategies which will provide not only district-wide but regional outcomes.

What is the evidence telling us?

Infrastructure providers working in our district have identified infrastructure improvement opportunities to support growth into the long term future.

We need to take into account, and support the delivery of, local strategies to improve health. Kent and Medway NHS have been developing proposals and have a shortlist for two options for hospital provision in east Kent. Our preferred option is to develop a new hospital at Kent and Canterbury

Hospital and to refurbish some of the current hospital buildings to provide a modern A&E, and specialist services which would serve the whole of east Kent. The alternative option would see investment focused at Ashford and Margate.

It is important that we make sure there is enough choice of school places for children in the district. The local education authority (KCC) is responsible for planning for school places, but the Local Plan can play an important role by securing land and developer contributions towards the delivery of key school infrastructure alongside new homes. KCC has been clear for some time now that there is a need for additional secondary and grammar places at the coast.

Local Plans can also play a part in helping to increase the use and supply of renewable and low carbon energy and heat, which is a key area in the efforts to meet our climate change objectives. The government recognises that nationally, while the UK leads the world in the deployment of offshore wind, there are opportunities to develop greater energy generation through onshore wind and solar too.

Locally, we are well placed to capitalise on these opportunities, with our coastline and higher annual average of sunshine hours compared to other parts of the UK. There is also an opportunity to boost support and economic growth for the low-carbon energy sector, to lead to more schemes similar to the new hydrogen plant facility being built at Herne Bay.

We know that the south east of England is under water stress and suffers from water shortages in the summer. To help to make sure there is enough clean water, South East Water has confirmed that a new reservoir at Broad Oak will be needed by 2033, which is within the period of the new Local Plan.

We will continue to engage with Southern Water to understand the need for any additional treatment and sewerage capacity to serve new development in the district, and to make sure that development is coordinated with the provision of necessary wastewater infrastructure.

The new Local Plan will need to allow the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

KCC have set out that it is essential that new-build properties are able to access high-quality and future-proofed broadband connectivity, as opposed to retro-fitting later.

The government Digital Connectivity Portal guidance says that Local Plans should outline how planning policies will support the rollout of both fixed and mobile digital infrastructure, such as making sure that all new developments have sufficient ducting space for full fibre connectivity, and supporting the effective use of rooftops and street furniture to accommodate digital infrastructure, including small cells for 5G.

What came out of the consultation?

The consultation responses highlighted opportunities to address existing deficiencies in infrastructure capacity and quality.

Concerns around the current healthcare provision in the district primarily centered around the need for accident and emergency services, and there was support for the redevelopment of Kent and Canterbury Hospital. KCC said that they would like the hospital site to be placed where it can be accessed by both the city and directly off the A2, and/or an improved A28, to reduce hospital-bound traffic from using the central ring road.

Concerns were also voiced about there being limited school places, especially in areas with new housing communities. It was felt that travel to and from schools, especially to and from the coastal towns to Canterbury, is a significant contributor to traffic congestion. There was support for the provision of another secondary school or grammar school on the coast to reduce the number of pupils travelling into Canterbury.

To help to tackle climate change, there was endorsement for greater renewable energy generation within the district. Suggestions included the creation of more solar farms and onshore and offshore wind turbines, and there was a call to find sites for these purposes. Options for renewable energy infrastructure are in the next section.

There were several concerns raised about the resilience of the clean water supply, and there was support of a new reservoir at Broad Oak. It was felt that a new reservoir will provide opportunities to enhance the existing natural and historic landscape.

Concern was also expressed about waste water discharge creating environmental issues, such as at Stodmarsh. The consultation pointed to the need for better sustainable drainage systems for new developments, which involve green infrastructure.

In terms of digital infrastructure, there was support for faster and more reliable broadband across the district, particularly in rural areas to support rural businesses and home working. The consultation also showed support for next-generation mobile networks such as the rollout of 5G.

How should we do this?

Option HNC14A - keep current approach to strategic infrastructure projects

The current approach provides broad encouragement for strategic infrastructure projects, to make sure enough provision is made for various infrastructure types alongside new development.

This support for strategic infrastructure is reflected in different ways, across several policies directed at various infrastructure types. The Local Plan mentions strategic infrastructure projects which might come forward, such as Broad Oak Reservoir, and it identifies a specific allocation for new development related to Kent and Canterbury Hospital.

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

This option builds on the current approach in the Local Plan, but reflects this through a single strategic policy which provides support to infrastructure proposals needed to support development.

It would set out generic requirements for strategic infrastructure projects; for example that primary healthcare facilities are accessible by sustainable transport (walking, cycling and public transport) and to not create unacceptable environmental impacts.

This option allows flexibility but also some certainty to infrastructure providers to progress major infrastructure projects from outline to design stage and beyond.

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

This option would build on Option HNC14B to allocate sites and take a more proactive approach to the delivery and design of infrastructure projects, where justified and where these are sufficiently progressed.

This would involve setting policy criteria for each allocation; related to the scheme design, connectivity, capacity, and other public benefits, to manage some of the outcomes of projects through the Local Plan.

Land would be allocated in the Local Plan for all infrastructure types where the need for strategic infrastructure projects has already been established, which might include a new hospital at Canterbury, a new secondary school on the coast and a reservoir at Broad Oak.

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

- Option HNC14A** - keep current approach to strategic infrastructure projects
- Option HNC14B - provide overarching general support for strategic infrastructure projects which are needed to support growth
- 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

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

I have selected the status quo because it is unclear to me where the building of new roads fits into this consultation document, which makes it seem premature to approve extending powers to allocate sites & take a proactive approach etc to a significant branch of infrastructure which is not adequately discussed.

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

.....
.....
.....
.....

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

What is the issue and why is it important?

Renewable energy provides reliable power supplies and fuel diversification which enhances energy security and reduces the need for imported fuels. They emit no or low greenhouse gases and no polluting energy, making them the cleanest, most viable solution to prevent environmental degradation.

Clean energy is vital for combating climate change and limiting its most devastating effects. Renewable energy also helps conserve the nation's natural resources and will continue to be a key component to tackling the climate crisis.

Community and utility scale renewable energy relate to solar and wind energy generation with a primary purpose of exporting to the grid. It can also include other related renewable energy infrastructure such as hydrogen generation and battery storage.

What is the evidence telling us?

KCC commissioned research and modelling from Anthesis as part of the Business Energy and Industrial Strategy project; to provide regional and local projections for emissions reduction pathways to net zero emissions.

The hierarchy of actions used by the Anthesis SCATTER models is based on an established supply-demand balance method in accordance with national strategies to reach net zero emissions: reducing the need for fossil-fuel energy, switching to electricity as the principal transmission of energy, decarbonising the electricity production and lastly offsetting any remaining carbon emissions.

The Anthesis projections require a large and rapid increase in electricity from wind power. Canterbury district has a high wind energy potential, and with year-round generation, the largest share of the renewable energy mix is projected to be from wind power.

The potential for solar photovoltaic generation in Canterbury district is also high. The increasing annual sunshine provides a large energy yield that can be harnessed through a broad combination of rooftop solar on both domestic and commercial buildings, canopies on car parks, some open spaces and in agriculture that can provide co-benefits of shade and rainwater collection and some large-scale solar operations.

The new Local Plan will need to consider how onshore wind generation can be delivered in order to meet carbon emissions reduction goals.

What came out of the consultation?

Stakeholders were supportive of developing renewable energy in the district to combat climate change.

How should we do this?

Option HNC15A - keep the current approach to renewable and low carbon energy production development

This option would continue to encourage proposals for the utilisation, distribution and development of renewable and low-carbon sources of energy, including freestanding installations in the appropriate locations.

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

This option would remove the requirement for applicants to show the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and approve the application if its impacts are (or can be made) acceptable.

Additionally, this option could provide a map to show where community and utility scale renewable energy projects - wind and solar generation with associated infrastructure - are particularly needed to meet the district's energy needs and contribution to net zero emissions.

This mapping would need to take into account things like closeness to other development or district power infrastructure and any heritage or other relevant land use considerations.

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

- Option HNC15A - keep the current approach to renewable and low carbon energy production development
- 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):

The climate emergency and its consequences are crucially important in decisions being made for the future of the city. Low carbon options for energy are crucial

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

.....

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

What is the issue and why is it important?

Pressures on existing infrastructure can be made worse by new development, and this is a particular issue if the delivery of new infrastructure does not happen at the right time.

This additional pressure can lead to infrastructure being stretched, which in turn can impact people's daily lives; for example, if roads become congested or GP waiting times increase.

What is the evidence telling us?

The new Local Plan will need to make enough provision for infrastructure for transport, telecoms, waste, water; and community facilities such as health, education and culture.

We also need to set out infrastructure contributions expected from development and show that necessary infrastructure will be delivered at the right time to support growth.

Normally the provision of infrastructure as part of a development; or the timing of financial contributions towards infrastructure, is planned to take place in time to meet the additional need created by the development. For example, a capacity increase at a school may be planned at the same time that a substantial amount of houses in a new housing development are occupied.

The government is increasingly advocating a move towards infrastructure being delivered up front, although some of the key mechanisms for delivering this remain under development. KCC also

champion this 'infrastructure first' approach, and promote the creation of appropriate infrastructure to be delivered ahead of housing growth, where necessary.

What came out of the consultation?

There was a strong, consistent message that infrastructure needs to be planned effectively alongside housing and economic growth. Infrastructure (especially roads) should be provided early on in the development, even if temporary.

KCC also strongly supports an infrastructure first approach to development, and believes that this approach leads to the most successful, sustainable communities.

The way in which the viability of developments can be impacted by the requirement and timing of financial contributions towards infrastructure is also a concern.

Infrastructure delivery and a shift towards a more infrastructure-first approach would therefore need to be thought about with the overall viability of delivering growth.

How should we do this?

Option HNC16A - keep current approach to infrastructure delivery

The current Local Plan does not contain a policy which sets out when infrastructure should be provided to best support development.

Instead, the timing of infrastructure provision is negotiated at the planning application stage. Although this approach provides flexibility at the point of decisions, it can be difficult to secure the delivery of infrastructure at the right time in some cases; like viability issues.

Option HNC16B - set clear requirements that necessary infrastructure must be provided at the right time to address the impacts of development

This option would set out a clear policy requirement that infrastructure improvements or contributions towards infrastructure must be delivered at the time it is needed to serve development.

Developments would need to show either that existing infrastructure has enough capacity, or that their development will provide enough capacity at the time it is needed to mitigate any pressures created.

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

This option would build on Option HNC16B by promoting an 'infrastructure first' or infrastructure-led approach to the delivery of critical infrastructure.

Working with infrastructure providers, developers and national and regional agencies, we would explore opportunities and mechanisms to deliver key priority infrastructure projects, such as major transport schemes, ahead of housing growth in an area or ahead of development being occupied.

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

- Option HNC16A - keep current approach to infrastructure delivery

- ❑ **Option HNC16B - set clear requirements that necessary infrastructure must be provided in a timely manner to address the impacts of development**
- ❑ 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):

Yes, the timing of planned infrastructure is crucial, but the nature of the planning & decision-making process is equally crucial. It has to be well-publicised and transparent.

.....

.....

.....

.....

If you think there's a better option for delivering infrastructure at the right time, let us know:

.....

.....

.....

.....

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

What is the issue and why is it important?

Viability is really important in plan making and decision taking.

We need to show that the plan is deliverable; in other words, we need to show that the combined costs of developments (such as land, materials and infrastructure) do not exceed the total value of the scheme. If we don't get this balance right, sites we identify may not be developed as intended.

What is the evidence telling us?

The Community Infrastructure Levy (CIL) Viability Study undertaken in 2018 showed that various development types, such as housing, hotels and student accommodation, had enough headroom to remain viable when charged through the CIL.

This is a useful context, as it shows that development viability is generally positive in our district, which can support future growth and the delivery of infrastructure and affordable housing.

Going forward, we will need to set out the contributions expected from development, such as the level of affordable housing provision needed and what infrastructure will be needed to support new development sites.

New national planning guidance on viability looks to put the viability assessment of development sites at the Local Plan stage; to provide more certainty to developers, stakeholders and the community about how identified sites will be delivered.

We will assess the viability of the whole plan at the next stage of the process, to show that it is deliverable. These parameters will then be fixed and should not need further assessment at the planning application stage.

What came out of the consultation?

Several concerns were raised regarding viability issues impacting on the quality of new developments as well as the ability for them to go ahead.

There was specific concern about developers being able to renegotiate a scheme at application stage, which can lead to less affordable housing being achieved than was originally expected, for example.

A move towards putting the development viability assessments at plan making stage instead of planning application stage is required by the new national planning guidance, and also saw support in the consultations and conferences.

Other responses suggested that we tackle viability issues by exploring how we can receive more grants from central government or other grant funding bodies.

How should we do this?

Option HNC17A - keep current approach to accepting viability assessments

We currently accept viability assessments at planning stage, but encourage them to be submitted at pre-application stage if there are any early concerns about viability, in order to prevent potentially long delays created by a review of viability at the planning approval stage.

Option HNC17B - no new viability evidence is accepted at planning application stage

This option would mean no additional viability evidence accepted at the planning application stage, on the basis that potential risks to developers are already accounted for in the Local Plan's viability assessment assumptions.

Although this would set out a very clear position, important values such as build costs or sales values do change over time, so this may present deliverability issues to some sites over the period of the new Local Plan to 2040.

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

This option would severely scale back the circumstances where new viability evidence is accepted at the planning application stage, on the basis that key values and expectations are fixed through the Local Plan.

For example, some factors such as land values and developer profits would be non-negotiable, but other factors such as build costs or house price values may have changed materially and could be open to review at the application stage.

Reflecting the national guidance, any new viability evidence would need to show the extent to which the specific values applied in the Local Plan viability assessment have changed.

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

- Option HNC17A - keep current approach to accepting viability assessments
- Option HNC17B - no new viability evidence is accepted at planning application stage
- 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):

.....
.....
.....
.....

If you think there's a better option for development viability changes, let us know:

Employment and the local economy

Issue EMP1 - Provide enough business space in the right locations

What is the issue and why is it important?

Land and business premises need to be available in the right locations to allow existing businesses to grow as well as support start-up businesses and attract new businesses.

Different types of businesses need different types of space and locations. For example, a distribution warehouse may need good access to a motorway, whereas professional services are more likely to be located in urban areas.

This is particularly important in our district which has two distinct “sub-market” areas: one in the city with professional services and offices, and another at the Coast where there is more industrial space.

What is the evidence telling us?

The Economic Development and Tourism Study 2020 showed that 136,700sqm (or 29.7ha) of new business space is needed over the period of the new Local Plan to 2040. Although this figure is lower than the amount of space planned for in the current Local Plan, the report shows deliverability risks with some of the existing allocated employment sites.

Many of these sites have not been developed, and some have already been lost to other uses. There may be potential to expand or intensify existing business areas, which can be quicker than developing totally new sites.

What came out of the consultation?

These risks were highlighted in the issues consultation last year. There were many comments that new business space needs to be accessible by sustainable transport. This will support both inward investment and a shift towards low carbon travel.

A consistent message from the consultation was that new jobs must be created alongside housing growth to achieve sustainable economic growth.

What are the available options?

Option EMP1A - Continue with current economic strategy and land allocations

The current strategy focuses employment growth in the strategic development areas and at employment allocations in Herne Bay.

This option would see the new Local Plan continue this approach to 2040, without any new or alternative allocations.

Many of these sites remain well located for business purposes, and the oversupply of space allows for some flexibility to respond to changing economic conditions.

Option EMP1B - Continue with current economic strategy and land allocations but remove sites with significant deliverability risks

The Economic Development and Tourism Study 2020 identifies concerns around the delivery of key sites, including:

- Altira Park, Herne Bay
- Eddington Park, Herne Bay
- Sturry Road

An oversupply of employment land provides some flexibility to the market, but the concerns around deliverability make it difficult to justify keeping these allocations in their current form. We may not be able to rely on them for the delivery of new business space during the period of the new Local Plan.

Removing these sites would focus the strategy on the more deliverable sites. It may also provide opportunities for other types of development to come forward in these areas.

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

As well as concerns about the delivery of some of the allocated employment sites the Economic Development and Tourism Study 2020 (EDTS) highlights concerns around the delivery of the full amount of employment land from some of the strategic development sites, such as at Strode Farm and Hillborough. The EDTS raises questions over whether the location of some of the existing allocations are aligned with the needs of the market.

Scaling back the current strategy would provide an opportunity to consider alternative sites which are more deliverable or more aligned to the needs of the market. For example, the EDTS shows that there is an undersupply of industrial space at Whitstable. There may be opportunities to provide more flexible co-working, office or meeting spaces in the urban areas.

There may be potential to expand or intensify some of the most successful existing employment and business areas, such as Lakesview. These types of development opportunities already have transport infrastructure in place. They could be quicker and easier to deliver than new business parks within strategic development areas, and could support additional business and job growth.

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

- Option EMP1A - Continue with current economic strategy and land allocations
- Option EMP1B - Continue with current economic strategy and land allocations, but remove sites with significant deliverability risks
- 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 *

Which option best allows the impact of the pandemic on working practices, short term and long term, to be taken into account?

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

Issue EMP2 - Provide the right mix of jobs

What is the issue and why is it important?

The types of jobs created in the district to 2040 will have an impact on the wellbeing of residents through income levels and skills development. We need to support the growth and success of key sectors, such as tourism and health and education, but also provide the right conditions for growth in sectors with high productivity levels to boost local incomes.

The new Local Plan will need to balance supporting the creation of higher value jobs while not restricting the creation of other job opportunities needed to support the economic growth of the district.

What is the evidence telling us?

Jobs in the retail, hospitality, administration, health and education sectors make up almost 60% of the local economy. The value to the economy generated by each worker in some of these sectors is less than other higher value industries. In 2019 each job in the district was estimated to generate £44,600 of "output" each year. This is £7,100 lower than the UK average. This is also reflected in local employee earnings levels, which fall well below national averages.

The EDTS (2020) shows a need for land and premises for a range of business types over the period of the new Local Plan. This includes offices, industrial units and warehouses. There may be opportunities to provide co-working and flexible office space in urban areas, and for research and development employment related to the universities. This could help to create higher paid jobs.

What came out of the consultation?

During the Issues consultation many comments said that there was a lack of diverse, higher skilled and better paid jobs in the district. People said that the choice of employment is too narrow and dominated by a few sectors which generally provide lower paid jobs. Focusing on science and technology related jobs, potentially linked to the universities, could support graduate retention and improve local incomes.

What are the available options?

Option EMP2A - Identify specific opportunity sites for higher-value jobs creation, and set out detailed employment mixes for allocated employment sites

This option would set out clear requirements for each individual employment allocation site, based on the findings of the EDTS (2020) and an assessment of the suitability of each site to deliver particular types of jobs. This may involve setting a specific use for an individual site, such as for office development, or prescribing a specific mix of employment uses expected to be delivered within the site.

This approach aims to balance the delivery of new employment space across the different types of space needed to ensure there are suitable opportunities for high value job creation in the district to 2040.

Option EMP2B - Provide full market flexibility within identified employment sites

This option would try to minimise any requirements on employment development sites to deliver particular types of business space or uses. This enables a more responsive, flexible and dynamic approach to meeting the needs of the market at a given point in time.

Removing any prescription on the use or type of business space to be developed may improve the delivery prospects for some sites, particularly as the needs of the market can change rapidly. The provision of new business space would be led by market demand and conditions.

The potential downside to this approach is that a concentration of particular lower value or very different uses could prevent higher value industries from being established in that location. This may also limit the council's ability to influence business activity at that location and have strategic oversight.

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

This option would seek to capitalise on opportunities for delivering higher paid jobs where sites for employment development are in locations suited to this type of activity. This might include providing activities related to the universities or flexible and co-working space in accessible urban locations.

Outside of these specific opportunity sites the approach for delivering new employment spaces would be responsive and market-led. This would enable greater flexibility and enhance deliverability over time.

Issue EMP2 - How can we provide opportunities for the right mix of jobs, including higher paid jobs, to be created? *

- Option EMP2A - Identify specific opportunity sites for higher value jobs creation, and set out detailed employment mixes for allocated employment sites
- Option EMP2B - Provide full market flexibility within identified employment sites
- 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

Tell us why you chose this option *

Can the blended approach be reviewed at intervals to ensure that the risks identified in relation to full market flexibility don't end up dominating the blend?

.....
.....
.....
.....

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

.....
.....
.....
.....

Issue EMP3 - Supporting the delivery of allocated employment sites

What is the issue and why is it important?

Although sites for new employment spaces can be identified within the Local Plan, how and when sites actually get developed can be difficult to predict. As noted in the previous section, some sites allocated for employment uses in the current Local Plan have not come forward as anticipated.

The new Local Plan will need to consider whether there are other ways in which we can support the delivery of sites and new floorspace needed to meet the demands for business space and to support economic growth in the district.

What is the evidence telling us?

We monitor how the supply of business space changes over time and, in recent years, the picture has been fairly static. Against the backdrop of increasing levels of housing being brought forward, it is important that, as a regional centre for jobs, the sites we identify for jobs growth are being delivered alongside new homes.

The EDTS identifies that the delivery of new space has been affected by a number of factors - including market, locational and viability issues. The viability of delivering new commercial space can be challenging, and this is also reflected in our Community Infrastructure Levy (CIL) charges where business spaces are not charged the CIL.

Alongside changes to the “portfolio” of sites identified within the new Local Plan for business space, the EDTS also recommends that the Council examines mechanisms to support employment delivery. This could include looking for funding opportunities and considering “enabling” development; for instance, allowing a wider mix of uses such as residential or other commercial development could improve the overall prospects of new business space being delivered.

What came out of the consultation?

Many respondents raised concerns about the availability of jobs in the district. As noted in the previous section, many of these concerns relate to the lack of higher-paid jobs in the area. Some respondents commented that although lots of new homes are being delivered, this is not being matched by new business space, and that we need a clear strategy for delivering business space to support greater levels of inward investment.

What are the available options?

Option EMP3A - Continue with current approach to delivery

The current approach looks to maximise the flexibility for developers to bring employment allocations forward for development, and places no specific requirements on the developers of strategic development sites in respect of the timing or delivery of employment space.

Option EMP3B - Require that all strategic development sites provide serviced employment land and a delivery strategy

This option would set clear requirements for developers of strategic development sites which include employment spaces to provide this as serviced land, to include vehicle access and utility provision, to improve the prospects and viability of the delivery of employment spaces. Alongside this, development proposals would be required to prepare a clear delivery strategy setting out how and when the employment space will be delivered.

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

This option would build on Option EMP3B, reflecting the recommendations in the EDTS, which highlights opportunities for the Council to take steps to intervene to support the delivery of employment space in particular where viability barriers exist. For instance, we could consider whether in these circumstances some enabling development, such as other commercial or residential development, may be permitted in order to support the delivery of employment space.

Issue EMP3 - How can we best support the delivery of allocated employment sites? *

- Option EMP3A - Continue with current approach to delivery
- Option EMP3B - Require that all strategic development sites provide serviced employment land and a delivery strategy
- 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 * ***I have not commented on this for lack of time. Please see comments on later sections.***

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

Issue EMP4: Improving the accessibility and connectivity of employment areas

What is the issue and why is it important?

In planning for new business spaces we need to consider how best to ensure they provide the right infrastructure and conditions to support businesses into the future. National policies encourage us to look at accommodating employment sites in the most accessible locations; for instance close to sustainable transport hubs or as part of wider mixed-use developments.

Jobs located within walking and cycling distance of where people live can help to support active travel and improve residents health and well-being.

High speed digital (e.g. broadband/mobile) infrastructure too will be important to support business growth and will be increasingly important should, as anticipated, the shift to online working continue following the global health emergency. The new Local Plan provides an opportunity for us to embed the delivery of high speed broadband infrastructure within new business developments and to facilitate further investment in digital infrastructure for the district.

What is the evidence telling us?

Improving digital infrastructure is a priority at a national level, with the latest programme looking to roll out gigabit-capable broadband over the coming years. Broadband infrastructure is also central to regional strategies to boost growth and productivity, and to support innovation, including the Thames Estuary Production Corridor and the emerging Kent and Medway Enterprise and Productivity Strategy.

The delivery of high speed broadband also features heavily, alongside measures to improve opportunities for active travel and sustainable transport, within the Kent and Medway Low Emissions Strategy (2020) as a means to improve air quality, support climate change objectives and improve the health and wellbeing of residents. Full fibre broadband...

In addition advanced cellular services (e.g. 5G) are equally as important and fixed line digital and we would expect infrastructure rollouts from mobile network providers (MNOs) to only accelerate across the district through the local plan period.

What came out of the consultation?

The quality of broadband and mobile services in the district was repeatedly raised as potential barriers to economic growth and investment through the consultation and via other conversations with local businesses. Jobs growth, and particularly high value jobs growth, it was felt, will depend on significant improvements to broadband speeds - and the poor quality of local speeds has been highlighted through the global health emergency.

Alongside broadband speeds and mobile coverage, congestion and air quality were also identified as significant constraints to the growth of the local economy. A number of respondents commented that new employment opportunities should be located in areas accessible by active travel and sustainable transport modes in order to reduce the reliance on cars.

Also given previous experience of broadband enabling across Kent the council must ensure that new employment sites are digitally well prepared and equipped before development to avoid the need for expensive, retro-fitting of digital infrastructure in the future.

What are the available options?

Option EMP4A - Enable new employment developments to provide digital infrastructure and sustainable transport connectivity in response to market demand

This option would minimise any prescriptive requirements for infrastructure delivery as part of the delivery of new employment space, enabling developers to respond more flexibly to the needs of the market.

High speed broadband and future mobile services will be more important to some businesses than it is to others, and there may be specific reasons why some businesses require locations which are not well served by sustainable transport; logistics businesses for instance may prioritise access to the strategic road network.

Enabling a more dynamic approach, on a site-by-site basis, may help to support the viable delivery of new employment spaces in the district.

Option EMP4B - Require all new employment developments to provide full fibre connections and be accessible by sustainable transport

This option would place mandatory requirements on all new employment developments to include full fibre to the premises connections. Exemptions may apply for very small or more remote sites however the approach would seek to maximise the potential for the fastest broadband speeds to be delivered within new employment sites.

Similarly, this approach would include requirements to ensure that new employment sites were highly accessible by sustainable transport modes and, where such infrastructure is not already in place, improvements would be required to ensure opportunities exist for access by walking, cycling and public transport. Again, there may be limited exemptions for sites of a particular size or location.

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

This option would build on the requirements set out in EMP4B, which seeks to maximise the connectivity and accessibility of employment developments, by ensuring that all strategic development sites (which would typically be housing-led) incorporate some business and commercial space within them.

This approach would seek to provide opportunities for flexible work space, and potentially live-work type units, to enhance the sustainability of new communities and to reduce the need to travel.

Issue EMP4: How can we improve the accessibility and connectivity of employment areas ?
*

- Option EMP4A - Enable new employment developments to provide digital infrastructure and sustainable transport connectivity in response to market demand
- Option EMP4B - Require all new employment developments to provide full fibre connections and be accessible by sustainable transport
- 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 * ***I have not commented on this for lack of time. Please see comments on later sections.***

.....
.....

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

.....
.....

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

What is the issue and why is it important?

Commercial buildings comprise a wide range of form, usage and construction type; however there is a common need to reduce the operational carbon emissions from commercial buildings to net zero in line with national and regional commitments. This must be achieved through reducing the need for energy, replacing fossil fuels with low carbon energy sources and implementing renewable energy generation.

What is the evidence telling us?

The current Local Plan encourages energy efficiency in commercial buildings through the use of "BREEAM" standards. Although there are some exemplar BREEAM 'Outstanding' buildings and at least one net zero emissions building in the district that have been constructed in the last few years, most new commercial buildings in the district are constructed to a 'Very good' standard and the average emissions generated from heating and powering them averages 30 tonnes CO2 emissions per building per year.

The energy standards set in the Local Plan are an important mechanism to enable commercial buildings to be built and modified to a net zero emissions standard.

What came out of the consultation?

Similarly to responses on the design of new homes, many respondents commented that new commercial buildings should be designed to be energy efficient and to contribute to the Council's objectives for addressing climate change.

What are the available options?

Option EMP5A: Specify that all new commercial buildings must be designed to BREEAM Excellent

The BREEAM standard is used throughout the UK as a comprehensive evaluation mechanism for building design. By specifying 'Excellent' it ensures that commercial construction builds to good all round sustainability standards including energy efficiency, carbon emissions and adapting to climate change.

The current Local Plan encourages projects in the district to aim for 'Excellent', the level below 'Outstanding', but the majority achieve 'Very Good', the third level which the current Local Plan allows. Although this option would be an improvement on the existing requirements, it would not achieve the emissions reductions needed to achieve net zero, in line with policy at a national and regional level.

Option EMP5B: Specify that all new commercial buildings must be designed to BREEAM Outstanding

This option would raise the bar for new commercial buildings, meaning that additional efficiencies would be achieved in energy and resource efficiency through better insulation, protection from excessive solar gain and the full range of sustainability measures covered by the BREEAM points-based assessment process.

Again, although this option would be a significant improvement on the existing requirements, it would not achieve the emissions reductions needed to achieve net zero, in line with policy at a national and regional level.

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

This option would set a tangible goal for the measured energy level of commercial buildings. Currently around 2% of district buildings are at level A standard, and only one building is level A+ which is a net zero standard.

This option would include a payment mechanism with an appropriate carbon price for any developments that do not achieve the standard. The payment would contribute to a fund to enable other decarbonisation works in the district.

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

This option would set an immediate net zero standard for commercial buildings and would require designs to meet high air tightness levels, ventilation with heat recovery, efficiency low carbon heating

and on-site renewable energy generation in order for new development in the district to make a direct contribution to reducing district carbon emissions.

This option would include a payment structure with an appropriate carbon price for any developments that do not achieve the standard. The payment would contribute to a fund to enable other decarbonisation works in the district.

Issue EMP5: How can we improve the energy performance and carbon emissions of new commercial developments in the district? *

- Option EMP5A: Specify that all new commercial buildings must be designed to BREEAM Excellent
- Option EMP5B: Specify that all new commercial buildings must be designed to BREEAM Outstanding
- 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
- 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

Tell us why you chose this option ***I have not commented on this for lack of time. Please see comments on later sections.***

.....

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

Issue EMP6 - Supporting the development of our universities

What is the issue and why is it important?

Education is by far the largest sector in the district, providing over 16,000 jobs in 2019. The sector has grown rapidly over the last 10 years or so and growth is forecast to continue over the period of the Local Plan to 2040. The universities clearly play a major role in the district's economy and the Local Plan will need to set out a clear framework to support the sustainable growth and development of these institutions.

What is the evidence telling us?

The universities have ambitious plans for development and both the University of Kent and the Canterbury Christ Church University have drawn up campus masterplans which outline significant investments planned for the coming years.

Clearly the Covid-19 pandemic has had significant impacts on the higher education sector over the past year, with many lectures moving on-line, and presents some uncertainty looking forward.

However, following the delivery of the Kent and Medway Medical School, the universities remain committed to improving the educational and student experience, and will continue to play a central role in the growth of the knowledge economy within the district.

What came out of the consultation?

Many respondents recognised the importance of the universities in supporting the economic growth of the district, in particular in relation to higher paid jobs, such as in research and development and technology.

Some concerns were raised about the impacts of Covid-19, including the implications for Purpose Built Student Accommodation, however respondents also commented that more needs to be done to encourage students to stay in the district after graduating.

What are the available options?

Option EMP6A - Continue with current approach to university development

The current approach provides in-principle support to the development of facilities within the University of Kent campus and at suitable locations within the urban area for Canterbury Christ Church University, subject to consideration of matters such as design and transport. In the case of the University of Kent, the current Local Plan advocates the preparation of a campus-wide masterplan ahead of any significant development proposals.

This approach provides significant flexibility, as well as support, to the universities to develop and improve their facilities over the period of the Local Plan.

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

Alongside high level support, which recognises the strategic importance of the universities to the local economy, this option would take a more proactive approach to support the delivery of the universities' growth ambitions, setting a clear policy framework for growth and, where appropriate, embedding elements of the universities' masterplans within the Local Plan itself.

This approach would provide more certainty to the universities and to communities as regards the level and type of development anticipated over the period of the Local Plan to 2040.

Issue EMP6 - How should we support the development of our universities? *

- 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 ***The 2 universities play a crucial role in the city and district, but I do not know enough about the master plans to select EMP6B. What are the checks and balances?***

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

.....

Issue EMP7: Supporting new tourist accommodation

What is the issue and why is it important?

The district's visitor economy (prior to the pandemic) had continued to perform well with a diverse offer including cultural heritage, coastline, countryside and food and drink.

Further growth is anticipated. However there is a recognised need to provide more visitor accommodation of different types and locations to convert more day visits into overnight stays.

The global health emergency has had significant impacts on the tourism sector given the restrictions on movement and the Local Plan provides opportunities to support the recovery and continued growth of this sector.

What is the evidence telling us?

The hospitality sector accounted for some 8,600 jobs in 2019 and was the second largest sector in the district in terms of number of jobs. The EDTS (2020) forecasts significant growth in the sector over the period of the new Local Plan, with the potential for another 1,200 jobs to be created.

Converting more day trips to overnight stays through the provision of additional accommodation is an important way to maximise the economic benefit of tourism and to support the local economy.

The EDTS (2020) identifies a need for more tourist accommodation at all quality levels and across the district. The study highlights a specific need for "Meetings, Incentives, Conferences and Exhibitions" (MICE) accommodation, which echoes the findings of the Kent Accommodation Study undertaken by Visit Kent and Locate in Kent.

In addition to this specialist accommodation, there is also demand for more hotel accommodation at the coast, where we have seen interest in creating new and expansions to existing facilities as well as an increase in AirBnB type accommodation in Whitstable. There is also further untapped potential in the rural areas of the district, linked to a rise in wellness and food and drink based tourism.

What came out of the consultation?

Although many respondents were keen to see the diversification of the economy, to create more highly paid jobs, there was a clear message that we need to support the tourism and hospitality sector, which is clearly seen as one of our key strengths.

Attracting more visitors to stay overnight, it was felt, will provide both direct jobs in the sector as well as supporting other parts of the local economy. The district has some world-class assets in terms of its historic and natural environment and the provision of tourist accommodation should help to realise the economic benefit of these assets.

Another message which came through the consultation was about the potential impacts of an over-concentration of Air BnB type accommodation. The Kent Accommodation Study identifies that the district has the highest provision in Kent, and respondents commented that this can impact the quality of life of residents living in the district. The local rise of AirBnB may also point to a lack of other appropriate, purpose built accommodation in the area.

What are the available options?

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

This option would see a continuation of the approach set out in the current Local Plan, which directs new accommodation to the town and city centres.

National planning policies identify tourist developments as “main town centre” uses. The centres are highly accessible, including by public transport, and these areas will accommodate many of the key attractions and be a focus for economic activity related to tourism. Hotels can also be excellent catalysts for urban regeneration and renewal, by revitalising tired or obsolete sites and properties.

However, the centres are highly constrained and the approach may restrict opportunities to deliver more accommodation across the district as a whole. Therefore sites on the edge of town and city centres may also provide feasible locations for this use.

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

This option would retain the focus with the city and town centres, but would respond more proactively to the identified need for additional accommodation where appropriate sites are available for allocation within the new Local Plan.

A good example of this would be the potential for a new hotel and conference centre at the University of Kent campus, to meet the identified need for MICE accommodation. The proposal is contained within the 2019 University Masterplan and could generate significant economic benefits for the district. Other operators specialise in or also provide accommodation along major road corridors/business parks so this option would also ensure these needs can also be supported where appropriate.

There may also be opportunities for allocations to provide additional accommodation at the coast, where this could support the tourism sector. This will be important when development opportunities cannot be accommodated in the urban areas while also re-balancing provision to avoid an over-concentration of AirBnB type accommodation.

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

This option would build on the approach set out at EMP5B, but with additional flexibilities to enable tourist accommodation to come forward across the district including rural areas. Given the highly constrained nature of our town and city centres, this would improve the prospects for accommodation delivery within the district.

For instance, sites located towards the edge of the urban areas, with sustainable transport connections into the centres, may be well placed to provide new accommodation.

In addition, given the rising popularity of rural breaks related to health and wellbeing, and to local food and drink, there may be increased demand for accommodation within the rural areas over the period

of the new Local Plan. These could take the form of spa hotels or retreats, and increased demand for conversions and/or extensions to existing facilities. Although it may be challenging to identify specific opportunity sites for accommodation in these locations, this approach could support proposals of an appropriate scale and form where they have a clear benefit to the local economy.

Issue EMP7: How can we support the delivery of new, high quality tourist accommodation to boost overnight stays and support the local economy?

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

Tell us why you chose this option ***I have not commented on this for lack of time. Please see comments on later sections.***

.....

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

.....

Issue EMP8: Supporting growth of the rural economy

What is the issue and why is it important?

Canterbury comprises large areas which are rural or semi-rural in nature. The District's rural areas play a significant role in the local economy.

The district benefits from high grade agricultural land and farming and food and drink production businesses dominate large parts of the rural landscape. The district has seen growth in the number of vineyards in recent years including Simpsons Wine Estate in Barham and the Chartham Vineyard. Food and drink production in the district also generates tourist trips and the Local Plan will need to provide the right conditions to realise and maintain the benefits of this for the district.

A number of the district's business parks are located within the rural areas including at Highland Court and Barham. Business units within the rural areas can provide jobs for local people and support the local economy more generally; for instance Chartham based Mansfield Farms Group is the largest fruit producer in the UK. Also Highland Court is home to fresh produce supplier, A Gomez Ltd. This firm is a real success story with £180 million annual turnover, a growing global export market and has

expanded its local operations significantly in recent years. As key suppliers to major supermarket chains including Tesco local firms have a major role to play in securing and increasing UK domestic food production.

Similarly, businesses based within the villages improve the sustainability of our rural settlements, as they can provide employment opportunities for rural residents therefore reducing their need to travel longer distances for work. Given the congestion and air quality issues around the district's urban areas, and the changes in working patterns emerging from the global health emergency, the new Local Plan will need to support the development of employment opportunities within the rural areas, where this can be accommodated.

What is the evidence telling us?

The EDTS (2020) examines the role of the agricultural sector in the district, and identifies that some 1,370 jobs were supported in the District's farming, food and drink sector in 2018. Although the number of jobs in agriculture has remained relatively stable across Kent in recent years employment in alcoholic beverage production has doubled since 2009. And food and drink business growth in Canterbury district has outpaced Kent and England-wide averages in recent years.

Significant growth is expected in wine production across the UK over the period of the Local Plan and there is clear potential for growth in wine tourism, especially where this is effectively linked and marketed with other vineyards nearby, such as through the Wine Garden of England initiative. The Local Plan may provide more emphasis on the sustainable growth of food and drink production industries to support both the direct benefits for the sector and the more indirect benefits through tourism.

Most established local rural business parks such as Barham and Highland Court are well occupied and the EDTS identifies that there may be some scope for intensification and/or expansion subject to matters such as highways and landscape impacts. Although there may be sufficient business space already available to meet anticipated demand in the rural areas, additional flexibilities around the provision of new business space in the rural parts of the district could facilitate business growth and expansion, and may be needed to support the shift away from traditional working patterns e.g. through flexible work space. Evidence from a number of recent planning applications has demonstrated an appetite from a range of successful business uses for in-situ growth/expansion at rural locations (e.g. Aether Medical at CMA Industrial Park in Chartham Hatch).

What came out of the consultation?

Many respondents recognise the need to continue to support the agricultural sector, although this was often in terms of protecting land from development. It was also felt that local food and drink producers should be promoted and supported more, and that this can be a key component of the district's tourism offer in the future.

Broadband speeds in rural areas remain a key issue for the district, but improvements should help to support rural businesses, particularly given the changes being seen to working patterns as a result of the global health emergency.

Some respondents also commented about the need for rural hubs, which may provide a focus of businesses and services at key settlements, to be developed and sustained which would enable residents in the rural areas to access jobs and facilities locally, without needing to travel into the urban areas.

What are the available options?

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

The current approach seeks to focus employment developments at existing sites; protecting sites from re-development for other uses, and supporting the expansion of existing businesses within these areas.

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

This option would provide additional opportunities for the development of commercial space within the rural areas, including at or nearby to the more sustainable rural settlements, such as the Rural Service Centres, to support local employment opportunities. Reflecting national planning policies, this approach would recognise that sites for commercial space may need to be found outside of settlements, and similarly the approach would support the appropriate expansion of existing rural employment sites, subject to considerations such as transport and landscape.

Issue EMP8: How should we support the growth and development of the rural economy ?

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

Tell us why you chose this option *I have not commented on this for lack of time. Please see comments on later sections.*

.....

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

Town centres and local facilities

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

What is the issue and why is it important?

Retail facilities are an important part of people’s lives and contribute significantly to the district’s economy. Achieving the right balance of quality, quantity and distribution of retail facilities is important and the new Local Plan will need to make sure that development proposals are appropriate for their location.

There are a number of shopping centres in the district which vary in size and the range of shops and support services they provide.

National planning policies make it clear that Local Plans should define a network and hierarchy of town centres and promote their long term vitality and viability by allowing them to grow and change in a way that supports a diverse retail offer, provides customer choice, allows a suitable mix of uses (including housing) and reflects their distinctive characters.

This hierarchy is important as national planning policies require a logical approach, where first preference for town centres uses should be for town centre sites, followed by edge of centre sites and, only then, out of town sites. This recognises the importance of town centres as locations to access services, shop, work and live.

What is the evidence telling us?

The current hierarchy of centres in the district is set out in the Local Plan. It is based on a range of criteria, including the size of the centre, the quantitative and qualitative range of retail and other uses, as well as its role in meeting the wider economic, civic, social and cultural needs of the district's residents and visitors.

The updated Retail and Leisure Study (RLS) (2020) did a review of the retail network and hierarchy, taking into account the evidence gathered through the health checks and household survey. It concluded that the current hierarchy should be carried forward into the new Local Plan:

- City/sub-regional centre
 - Canterbury, supported by other Canterbury retail locations:
 - Wincheap industrial estate
 - Riverside retail park
 - Marshwood industrial estate
 - Stour and Maybrook retail parks

- District centre
 - Herne Bay
 - Whitstable

What came out of the consultation?

Many people recognise the changing nature of our town centres and the challenges they face, particularly in light of the impacts of COVID-19.

Some concerns were raised about the need to promote more flexibility with the town centres, to support a greater mix of uses and events, and also to avoid too much out of town retail which can affect the numbers of people who visit our town centres.

How should we do this?

Option TCLF1A - amend the existing hierarchy of centres

This option would involve making adjustments to the existing hierarchy; for example to include additional other retail locations. Comments on potential changes are invited through the consultation, but the existing evidence doesn't suggest that changes are necessary.

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

This option would carry forward the existing hierarchy set out above into the new Local Plan. This is recommended by the RLS which found that the existing categorisation is still fit for purpose.

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

- Option TCLF1A - amend the existing hierarchy of centres
- Option TCLF1B (preferred option) - keep the existing hierarchy of centres

Tell us why you chose this option: ***Not enough information to make a choice.***

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

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

What is the issue and why is it important?

The historic nature of Canterbury city centre means that opportunities for it to grow and expand are limited, and so the nearby retail locations at Wincheap and Sturry Road perform a complementary role, particularly for retailers that need large building footprints or sell bulky goods.

As the nature of the city centre evolves over the period of the Local Plan to 2040, we can expect a range of pressures at these out-of-town retail areas.

What is the evidence telling us?

The Retail and Leisure Study (RLS) reviewed these areas and recommended that they continue to be designated for their complementary role to the city centre. The RLS also updated our evidence for the need for retail floorspace over the period of the new Local Plan using various assumptions including:

- estimated increases in population
- retail expenditure and internet shopping
- analysis of shopping market shares by centre and facilities
- estimates of the amount of additional convenience and comparison goods shopping turnover

The floorspace capacity calculations show a clear need for additional convenience floorspace. However, there was little need for additional comparison (non-food) floorspace. In fact, there was a small surplus forecast in 2035. The results of the forecast are summarised below:

Goods	Floorspace need 2035	Floorspace need 2040
Convenience	4,140 sqm	6,307 sqm

Comparison

-4,175 sqm

2,067 sqm

The RLS reflects national planning guidance to identify the type of retail floorspace needed, looking at least ten years ahead. However, the study also advised that these forecasts must be treated with caution given the uncertainty over the actual delivery of housing and economic growth and the potential issues with projecting retail needs so far into the future. These forecasts may also change again when we update this evidence to account for the impacts of COVID-19 later this year.

These forecasts indicate a significant reduction in the levels of floorspace needed from the current Local Plan, which allocates the Wincheap retail area for the delivery of 33,800 sqm comparison retail. This presents a clear opportunity to rethink the approach to supporting the vitality and viability of these important areas.

What came out of the consultation?

People were clear that the town centres should have a range of uses including leisure and cultural. Others identified a current lack of leisure and hospitality uses in some centres.

Most people that commented on these areas thought that we should be looking to limit out-of-town retail. Others said that Wincheap had lost its identity and suggested redeveloping the site for housing or as an ecopark.

How should we do this?

Option TCLF2A - continue with current approach to development at the out-of-town areas

This option would see the existing approach rolled forward, with these areas focused mainly on retail provision and, to a lesser extent, leisure.

Any need for retail floorspace which cannot be accommodated within the city and town centres would be directed to Wincheap.

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

This option would consider opportunities for any need for retail floorspace which cannot be accommodated within the city and town centres to be rebalanced across the areas, to support further growth at Sturry Road.

As well as this, there would be greater flexibility to support a range of uses such as leisure, offices and residential development to promote the growth and vitality of these areas, including through extensions onto nearby land where appropriate.

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

- ❑ Option TCLF2A - continue with current approach to development at the out-of-town areas
- ❑ **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:

.....

.....

.....

.....

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

.....

.....

.....

.....

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

What is the issue and why is it important?

Local centres in the urban areas provide shops and services that play an important role in meeting local day-to-day needs of residents, including the elderly and other vulnerable groups, at a neighbourhood level.

They can provide a more sustainable alternative to larger supermarkets, are accessible on foot or by cycling, and contribute to reducing congestion and pollution. They can also boost local economic activity and employment and provide a focal point for our urban communities.

What is the evidence telling us?

The Local Centre Survey Report (LCSR) (2021) updated our evidence on the local centres in the urban areas in the district; which are defined as clusters of at least three retail units, including a convenience store.

The LCSR recommended that all of the local centres designated within the current Local Plan are carried forward, and that some are expanded to make sure that properties in these areas which provide a service or facility for local residents are protected to support our communities. The existing local centres are:

- Wincheap
- Tankerton Road in Tankerton
- Herne Bay Road/St Johns Road in Swalecliffe
- Sea Street in Herne Bay
- Canterbury Road in Herne Bay
- Reculver Road in Beltinge
- Faversham Road in Seasalter

Some other areas were identified in the LCSR as potential new local centres. These areas meet the criteria for the designation and the LCSR recommends that they are designated as local centres in the new Local Plan:

- Zealand Road in Canterbury
- Hawe Farm Way in Broomfield, Herne Bay
- Poplar Drive in Greenhill, Herne Bay
- St Dunstons in Canterbury
- Canterbury Road in Herne

What came out of the consultation?

Many people said how important local facilities are to our communities and that these should be protected.

They also outlined how the services provided by local centres have been especially important during the COVID-19 pandemic, as more people work from home and will walk to their local shops instead of going to town.

Stakeholders would like more local centres in the urban areas to support the day-to-day needs of our communities. Others would also like the use of leisure facilities to be included as part of local centres.

How should we do this?

Wincheap, Canterbury

Option TCLF3A – keep the Wincheap local centre identified in the current Local Plan

This option would keep the current local centre boundary at Wincheap.

Option TCLF3B – (preferred option) keep the Wincheap local centre with boundary changes suggested

This option would build on Option TCLF3A by extending the local centre boundary at Wincheap. This would cover services identified by the LCSR.

It would expand protection that already covers retail shops or other community uses to the new areas.

Tankerton Road, Tankerton

Option TCLF3C – change the boundary of the existing Tankerton Road local centre

Although the LCSR didn't identify or recommend changes to the boundary, this option could remove some or all of the services from the designated area.

Option TCLF3D – (preferred option) keep the Tankerton Road local centre identified in the current Local Plan

This would keep the current local centre boundary at Tankerton Road.

Herne Bay Road/St John's Road, Swalecliffe

Option TCLF3E – keep the Herne Bay Road/St John's Road local centre identified in the current Local Plan

This option would keep the current local centre boundary at Herne Bay Road/St John's Road.

Option TCLF3F – (preferred option) keep the Herne Bay/St John's road local centre with boundary changes suggested

This option would build on option TCLF3E by extending the local centre boundary at Herne Bay Road/St John's Road to include another three commercial units.

Sea Street, Herne Bay

Option TCLF3G – keep the Sea Street local centre identified in the current Local Plan

This option would keep the current local centre boundary at Sea Street.

Option TCLF3H – (preferred option) keep the Sea Street local centre with boundary changes suggested

This option would build on option TCLF3G by extending the local centre boundary at Sea Street to include another three commercial units.

Canterbury Road, Herne Bay

Option TCLF3I – change the boundary of the existing Canterbury Road local centre

Although the LCSR didn't identify or recommend changes to the boundary, it did highlight that there are services and facilities essential to meet the local need. This option could change the boundary to remove some or all of these services.

Option TCLF3J – (preferred option) keep the Canterbury Road local centre identified in the current Local Plan

This option would keep the current local centre boundary at Canterbury Road.

Reculver Road, Beltinge

Option TCLF3K – keep the Reculver Road local identified in the current Local Plan

This option would keep the current local centre boundary at Reculver Road.

Option TCLF3L – (preferred option)

This option would build on option TCLF3K by extending the local centre boundary at Reculver Road to include another three commercial units.

Faversham Road, Seasalter

Option TCLF3M – change the boundary of the existing Faversham Road local centre

Although the LCSR didn't identify or recommend changes to the boundary this option could remove some or all of these services.

Option TCLF3N – (preferred option) keep the Faversham Road local centre identified in the current Local Plan

This option would keep the current local centre boundary at Faversham Road.

Zealand Road, Canterbury

Option TCLF3O – don't make Zealand Road a local centre

This option would keep the current approach and not make Zealand Road a local centre.

Option TCLF3P – (preferred option) make Zealand Road a local centre

This option would protect shops and services at Zealand Road by designating it as a new local centre.

Hawe Farm Way, Broomfield in Herne Bay

Option TCLF3Q – don't make Hawe Farm Way a local centre

This option would keep the current approach and not make Hawe Farm Way a local centre.

Option TCLF3R – (preferred option) make Hawe Farm Way a local centre

This option would protect the shops and services at Hawe Farm Way by designating it as a new local centre.

Poplar Drive, Greenhill in Herne Bay

Option TCLF3S – don't make Poplar Drive a local centre

This option would keep the current approach and not make Poplar Drive a local centre.

Option TCLF3T – (preferred option) make Poplar Drive a local centre

This option would protect shops and services at Poplar Drive by designating it as a new local centre.

St Dunstons, Canterbury

Option TCLF3U – don't make St Dunstan's a local centre

The current approach doesn't identify St Dunstan's as an area as a local centre, but instead mentions it in current Local Plan policy.

Option TCLF3V – (preferred option) make St Dunstan's a local centre

This option would protect the shops and services at St Dunstan's by designating it as a new local centre.

Canterbury Road, Herne

Option TCLF3W - don't make Canterbury Road a local centre

This option would keep the current approach and not make Poplar Drive a local centre.

Option TCLF3X - (preferred option) make Canterbury Road a local centre

This option would protect the shops and services at Canterbury Road by designating it as a new local centre.

How should we do this for Wincheap?

- Option TCLF3A - keep the Wincheap local centre identified in the current Local Plan
- Option TCLF3B - (preferred option) keep the Wincheap local centre with boundary changes suggested

How should we do this for Tankerton Road?

- Option TCLF3C – change the boundary of the existing Tankerton Road local centre
- Option TCLF3D – (preferred option) keep the Tankerton Road local centre identified in the current Local Plan

How should we do this for Herne Bay Road/St John's Road?

- Option TCLF3E – keep the Herne Bay Road/St John's Road local centre identified in the current Local Plan
- Option TCLF3F – (preferred option) keep the Herne Bay/St John's road local centre with boundary changes suggested

How should we do this for Sea Street?

- Option TCLF3G – keep the Sea Street local centre identified in the current Local Plan
- Option TCLF3H – (preferred option) keep the Sea Street local centre with boundary changes suggested

How should we do this for Canterbury Road in Herne Bay

- Option TCLF3I – change the boundary of the existing Canterbury Road local centre

- Option TCLF3J – (preferred option) keep the Canterbury Road local centre identified in the current Local Plan

How should we do this for Reculver Road?

- Option TCLF3K – keep the Reculver Road local identified in the current Local Plan
- Option TCLF3L – (preferred option) keep the Reculver Road local centre with boundary changes suggested

How should we do this for Faversham Road?

- Option TCLF3M – change the boundary of the existing Faversham Road local centre
- Option TCLF3N – (preferred option) keep the Faversham Road local centre identified in the current Local Plan

How should we do this for Zealand Road?

- Option TCLF3O – don't make Zealand Road a local centre
- Option TCLF3P – (preferred option) make Zealand Road a local centre

How should we do this for Hawe Farm Way?

- Option TCLF3Q – don't make Hawe Farm Way a local centre
- Option TCLF3R – (preferred option) make Hawe Farm Way a local centre

How should we do this for Poplar Drive?

- Option TCLF3S – don't make Poplar Drive a local centre
- Option TCLF3T – (preferred option) make Poplar Drive a local centre

How should we do this for Canterbury Road in Herne?

- Option TCLF3W - don't make Canterbury Road a local centre
- Options TCLF3X - (preferred option) make Canterbury Road a local centre

How should we do this for St Dunstan's?

- Option TCLF3U – don't make St Dunstan's a local centre
- Option TCLF3V** – (preferred option) make St Dunstan's a local centre

This is the only local centre I know well enough to comment on – St Dunstan's does play an important local role. The implications of boundary changes mentioned for other local centres are not made clear.

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

What is the issue and why is it important?

Services and facilities in our rural settlements can help rural communities to meet many of their day-to-day needs locally, and can be important to support the health and wellbeing of communities in the rural areas.

Not all settlements benefit from a wide range of services, and many of the smallest settlements have no services at all. Residents in the rural areas might need to travel to nearby larger villages to access important facilities.

Recent changes to the planning 'use classes' have reduced local authority power to protect some communities services.

Farm shops can provide another form of retail service for our rural communities, and often provide opportunities to buy local produce. We think that proposals for farm shops will continue to be assessed on a case by case basis.

What is the evidence telling us?

The Rural Settlement Study (RSS) (2020) updated our evidence for services and facilities at each of our rural settlements, and how this contributes to their sustainability. The most sustainable settlements - rural hubs and service centres - offer a range of key facilities such as schools, GP surgeries, shops and community meeting places, which allow residents to meet many of their day-to-day needs within these settlements.

Nearby smaller settlements, local centres and villages will have fewer services, but still provide important facilities for residents, reducing their need to travel into the urban areas.

The RSS looked at how residents in the smaller settlement;, including hamlets which have no facilities of their own, can access services in larger rural settlements, and identified a series of clusters of settlements, based around the rural service centres:

1. Sturry and Hersden
2. Chartham
3. Bridge
4. Littlebourne
5. Blean

The RSS shows that many of our rural communities are well served by important services, either within their own settlements or nearby. These services and facilities contribute significantly to the sense of identity and play an important role in community life.

Unlike local centres or town centres, services and facilities in the rural settlements will not always be clustered together, and are often scattered across the built up area of the settlement.

Although it may not be possible to define village centres with a boundary in the same way, this collection of key services and facilities contribute significantly towards the sustainability of our rural settlements.

What came out of the consultation?

People supported protecting services and facilities in rural communities, as they provide essential services, particularly for those who do not drive.

Others said about a need to support rural hubs which are larger rural settlements that provide access to a wider range of services and facilities, such as GP surgeries or primary schools.

This supports the findings of the RSS that identified six rural hubs or service centres which serve the population living there, as well as those living in other nearby settlements.

How should we do this?

Option TCLF4A - continue with the current approach to services and facilities in the rural settlements

The current approach to rural services and facilities allows the use or extension of some existing buildings to provide convenience shops or other local services in most cases.

We also protect against the loss of existing community uses unless specific circumstances apply, for example where there is no longer a continuing demand for the use or facility.

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

This would build on Option TCLF4A to designate village centres through the Local Plan, to promote new and improved services and facilities in or next to these settlements, similar to the approach at local centres in the urban areas.

In the more sustainable rural settlements in the district - the rural hub, service centres and villages - the key services and facilities would be protected from loss to other uses like residential, unless specific circumstances apply, and the development of new facilities would be supported to maintain and improve the sustainability of settlements of the new Local Plan period to 2040.

How can we best support our village centres?

- Option TCLF4A - continue with the current approach to services and facilities in the rural settlements
- 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:

.....

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

Movement and transport

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

What is the issue and why is it important?

Active travel, like walking and cycling, gives people the opportunity to be physically active as part of their daily routine. This can contribute to healthy lifestyles, improve mental health and boost productivity at work.

It also plays a key role in reducing emissions and protecting our environment. It's important that residents in new developments have access to safe and attractive walking and cycling paths that mean they can get around easily and reduce the need to go by car.

What is the evidence telling us?

National planning policies make it clear that new developments should create healthy, inclusive and safe places for residents to live in. Proposals for new developments should identify and maximise opportunities for walking and cycling. This includes providing a high quality walking and cycling network with the appropriate supporting facilities, and designing layouts that encourage walking and cycling.

Kent County Council is also promoting active travel, and is supportive of segregated routes which provide safe and pleasant environments for pedestrians and cyclists.

What came out of the consultation?

The consultation showed strong support for promoting active travel to improve air quality within the district. Many people would like to see more safe and attractive walking and cycling paths with the supporting infrastructure. Some expressed support for more safe cycle storage at bus or rail stations.

Others expressed support for prioritising active travel over modes of transport, while others commented that new developments should be located within 15 minute walking or cycling time to important services and community facilities.

How should we do this?

Option MT1A - continue with the current approach to safeguard pedestrian and cycle routes

This option would continue the existing approach to walking and cycling by protecting safeguarded routes for improvements to the walking and cycling network from development which might affect their delivery.

This includes projects like the Canterbury pedestrian zone improvements and creating a mainly off-road route from Herne Bay to Canterbury to provide an attractive alternative to the A291.

Option MT1B - (preferred option) all new developments must show how they will maximise opportunities for walking and cycling

This option would look to prioritise the consideration of opportunities to enhance the quality of, and access to, the walking and cycling network as part of development proposals. Developments would be expected to show best practice in design for cyclists and make sure the layout is fully accessible for cyclists, provides appropriate access to cycle storage in line with parking standards and encourages walking for short trips.

This approach would require all proposals for 'major' development to show in the transport assessment and travel plan how they are designed to encourage walking and cycling and are integrated with the existing walking and cycling networks. 'Small' development would need to show the same requirement through a transport statement. In some cases new developments may need to

make improvements to existing walking and cycling routes to maximise opportunities from their development.

How can we maximise active travel?

- Option MT1A** - continue with the current approach to safeguard pedestrian and cycle routes
- Option MT1B - all new developments must show how they will maximise opportunities for walking and cycling

Tell us why you chose this option:

If you think there's a better option, let us know: *Option MT1B seems pretty vague & non-binding – opportunities can presumably be considered and then ditched. There is the danger that high levels of air pollution are simply shifted from one area to another by a new development, so that active travel may be improved in one area by worsening it in another.*

.....

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

What is the issue and why is it important?

Public transport, such as bus and rail, provides vital connectivity for a wide range of users, including those who do not drive and people making longer distance trips.

As public transport can move many more people on much less space than individual vehicles, effective public transport systems can reduce congestion, which in turn reduces air pollution from idling vehicles and commuters can avoid the stress that comes from driving in congested areas.

Bus travel plays a significant role in reducing the numbers of cars on urban roads.

Bus passenger numbers have more than doubled since 2004 when the Quality Bus Partnership was formed. Strategic development sites must make improvements to the bus network to serve their sites. Investment in bus facilities and bus infrastructure have improved the attractiveness of bus travel.

Further investment will be needed to continue the pattern of improvements as the district continues to develop.

What is the evidence telling us?

National planning policies say that Local Plans should look for opportunities to promote public transport. Local authorities are encouraged to work with local highways authorities and other infrastructure providers to support sustainable transport and make sure development patterns are aligned.

We work with Kent County Council (KCC) on a range of transport projects, and the current Transport Strategy was prepared jointly with them. They think that public transport is likely to become a key form of transport following the COVID-19 recovery, and the new Local Plan should boost accessibility of rail

stations within the district; with measures including parking facilities with adequate electric vehicle charging, and secure cycle storage.

What came out of the consultation?

Many people expressed support for more reliable public transport which is accessible for all, including those who need wheelchair access.

There was also support for rail stations to be better connected to other modes of sustainable transport including buses and cycles. Others expressed support for more greener public transport such as electric buses.

How should we do this for road travel?

Option MT2A - continue with the current approach to bus improvements

This option would continue the existing approach to bus infrastructure, by protecting safeguarded routes for improvements to the bus network from development which might affect their delivery.

This includes projects like the fast bus link from the South Canterbury development.

Option MT2B - (preferred option) all major developments must show how they will maximise access to the existing local bus network

This approach would need all proposals for 'major' development - including proposals for 10 or more homes, more than 1,000sqm of floorspace or on sites of more than 0.5 hectares - to show how they will maximise access to the local bus network.

Developments which generate the need for new highway layouts should include the provision of adequate bus infrastructure. Where a new highway layout is not created, then the development should introduce new infrastructure, or enhance existing infrastructure, at appropriate locations on the current public transport network; if this is needed to create suitable access arrangements.

This should include examining opportunities to provide bus priority measures such as bus only streets and bus lanes. Developers will be expected to pay commuted sums to cover future maintenance of infrastructure. New developments may need to make improvements to existing bus routes to maximise opportunities from their development. This could involve putting more money into additional bus services.

How should we do this for road travel?

- Option MT2A - continue with the current approach to bus improvements
- 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):

I don't have enough information to make a choice here but agree that a reliable bus service is of crucial importance to a thriving city and to a low carbon mode of transport. Re option MT2B: Is the existing local bus network sufficient?

.....

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

How should we do this for train travel?

Option MT2C - continue with the current approach to rail improvements

This option would continue the existing approach to rail infrastructure, by protecting locations for improvements to the rail network from development which might affect their delivery.

This includes projects like the Canterbury West Station improvements which aims to provide opportunities around the station and increase parking capacity to meet the future demand.

Option MT2D - (preferred option) all major developments must show how they will maximise access to rail services

This approach would need all proposals for 'major' development - including proposals for 10 or more homes, more than 1,000sqm of floorspace or on sites of more than 0.5 hectares - to show how access to the rail network would be achieved.

Development proposals would be required to look at:

- walking distances and walking routes to stations
- cycling distance and cycle routes to stations
- convenience of bus access to stations
- details of destinations served from the rail stations
- frequencies of the services
- waiting facilities

Developments will need to look at opportunities to improve accessibility to rail services, and we will work with our partners to develop improvement schemes across the district.

How should we do this for train travel?

- Option MT2C - continue with the current approach to rail improvements
- Option MT2D** - all major developments must show how they will maximise access to rail services

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

Bus access to the stations needs to be improved, especially Canterbury West.

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

.....

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

What is the issue and why is it important?

Transport is the reason for 28% of greenhouse gas emissions in the district. Moving to electric vehicles will play an important role in reducing local air pollution and greenhouse gas emissions.

We need to plan for current and prospective electric vehicles drivers to be able to easily find and use charging points that are affordable, efficient and reliable. This includes providing enough active spaces that are fully wired and connected, and ready to use charging points, as well as capacity to add more improvements.

This means we'll need to make sure the underlying infrastructure is in place to allow simple installation and activation of a charging point at a future date.

Investment in rapid charging points will also be important. They help recharge electric vehicle batteries in a quicker time, which means they can travel further, as long as there are enough fast charging points on their journey.

What is the evidence telling us?

National planning policies set out that the environmental impacts of traffic and transport infrastructure should be identified and assessed so that any negative impacts can be mitigated.

In 2020 the government set a mission for all new cars and vans to be effectively zero emission by 2035. In order to support this mission, we will need a fit-for-purpose infrastructure network.

What came out of the consultation?

People commented they would like to see increased provision of EV charging points across the district to encourage a switch to electric vehicles.

Others suggested that all new homes should be installed with EV charging points.

How should we do this?

Option MT3A - continue with the existing approach to electric vehicle infrastructure

The current approach typically needs all off-street parking spaces in large, strategic developments to have 'active' EV charging points, and secure storage, parking and charging facilities that cater for e-bikes and scooters.

Currently we also say that around 10% of parking spaces within commercial developments should have 'active' EV charging points.

Option MT3B - (preferred option) accelerated transition to zero emissions vehicles

This option would build on Option MT3A by needing all off-street parking spaces in all developments to have 'active' EV charging points. Where on-street parking is provided, we would ask that 20% are 'active' (to include allocated spaces for visitors) and 80% have 'passive' infrastructure to allow the transition to EV over the period of the Local Plan.

This approach would also increase requirements for commercial development, so that 20% of parking spaces have 'active' EV charging points, to include a minimum of 10 rapid charge points for large retail developments such as supermarkets, where users will typically visit for shorter periods of time.

Alongside this, we would work with our partners to develop strategic measures to promote electric shared transport schemes, to accelerate the rollout of electric/hydrogen buses, and to explore the potential for a Clean Air Zone.

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

- Option MT3A - continue with the existing approach to electric vehicle infrastructure
- Option MT3B - accelerated transition to zero emissions vehicles – **but see below**

Tell us why you chose this option:

If “all off-street parking spaces in all developments [must] to have 'active' EV charging points” means that all new houses must have charging points, then Option MT3B looks the better of the two.

.....
.....
.....
.....

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

.....
.....
.....
.....

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

What is the issue and why is it important?

The need for greater controls over parking has developed as a result of growth in motor traffic; particularly in the ownership and use of private cars. The level of ownership has led to increased levels of congestion and pollution. This is particularly an issue in urban areas which are more densely populated.

In some areas across the district, cars have started to park on pavements where there is not enough off-road parking or a parking management scheme. This can create issues for buses or HGVs to use these roads.

The Local Plan can address some of these issues by implementing parking standards or having parking management schemes which can reduce parking in more densely populated areas or where congestion is known to be an issue.

What is the evidence telling us?

National planning policies set out that Local Plans should think about accessibility of the development, and the type, mix and use when setting local parking standards.

The level of local car ownership should also be looked at alongside the availability of, and opportunities for, public transport. There will also be a need to provide enough spaces for charging plug in and other ultra-low emission vehicles.

What came out of the consultation?

People highlighted the need for enough parking spaces for residents, visitors and deliveries.

Some people commented that parking bays in new developments are often too small and too few.

How should we do this?

Option MT4A - continue with the current approach to parking standards

The existing parking standards are based on guidance from Kent County Council, developed in 2006 and 2008.

They need different car and cycle parking spaces depending on the uses proposed, like residential or office. They also differ by area, so that less parking is provided in developments in town centres for example, rather than on the edge of the urban areas.

Option MT4B - remove parking standards and adopt a more flexible approach specific sites

This option would remove the current parking standards and instead adopt a flexible approach to parking spaces.

This would allow decisions to be made on levels of parking on a case-by-case basis at the planning application stage, taking into consideration the sustainability as well as the characteristics of the site.

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

This approach would change the current parking standards; reflecting the shift towards restricting parking spaces in the most sustainable and accessible locations, such as town centres or near to transport hubs, but also recognising that additional spaces might be needed in suburban locations, for example, where there is a risk that on-street parking might affect the ability of buses or bin lorries to move through developments.

It would also need more secure cycle parking space than is currently expected of new development proposals, to promote cycling and reduce travel by car.

How should we approach parking standards in the Local Plan?

- Option MT4A - continue with the current approach to parking standards
- Option MT4B - remove parking standards and adopt a more flexible approach specific sites
- 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:

I need more information to make a choice here.

.....
.....

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

.....

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

What is the issue and why is it important?

It is important that the safety of all users of the transport network; including pedestrians and cyclists, is protected and enhanced through planning decisions. Transport assessments, statements and travel plans provide established methods of looking at the impacts of developments on transport networks.

If assessments are poor or there are not enough, this can lead to impacts not being effectively addressed, as well as miss opportunities to improve access and safety for new and existing residents.

What is the evidence telling us?

National planning policies make it clear that all developments that will generate significant amounts of movement must provide a travel plan, and that planning applications should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be looked at.

Transport assessments and travel plans should make sure that safe movement is not compromised and the impact of development on the network is thoroughly considered.

Highways England say that the Local Plan should ask that all development proposals and their associated mitigation show that they are deliverable, funded and suitably maintained.

What came out of the consultation?

Transport and congestion were some of the biggest issues raised through the consultation, and many people commented that traffic conditions need to be improved if the district is to accommodate more growth.

Although the overall strategy for addressing these issues is considered in the Growth Options section, it is clear that individual assessments are needed to make sure that conditions don't get worse.

How should we do this?

Option MT5A - continue with the current approach to transport assessments and travel plans

The current approach requires transport assessments and travel plans on a case-by-case basis if we think a proposal will have significant transport implications.

Assessments should show how multimodal access options will be achieved and how transport infrastructure arising from the expected demand will be provided. Travel plans currently provide detailed information on how the impacts will be mitigated and focus on sustainable transport options.

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

This approach would require all proposals for 'major' development - including proposals for 10 or more homes, more than 1,000sqm of floorspace or on sites of more than 0.5 hectares - to submit transport assessments and travel plans.

This would standardise the criteria for when assessments would be needed to improve coverage and consistency of the policy.

Option MT5C - (preferred option) 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, plus all minor developments would have to submit transport statements

This approach would build on Option MT5B, making sure that all major developments completed the assessment and travel plan, but increasing the scope to other types of development, which might not be classified as major but could still have significant impacts on the transport network, including proposals which involve:

- new or altered access to the transport network
- improvement work to the transport network
- the creation of new transport infrastructure
- the generation of significant additional trips on the transport network

This option would also expand the current approach to require minor developments - including proposals between 1 and 9 homes, less than 1,000sqm or on sites of less than 0.5 hectares - to submit a transport statement; a simplified version of a transport assessment, to show how sustainable transport opportunities have been thought about in proposals.

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

- ❑ Option MT5A - continue with the current approach to transport assessments and travel plans
- ❑ Option MT5B - all major developments must submit transport assessments and travel plans
- ❑ 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

Tell us why you chose this option: ***Transport assessments, statements and travel plans should be approached openly and transparently. The discussion of overall strategy in the Growth Options section is insufficiently informative. It is not possible to make a well-founded choice with so little information. You refer to people's concern about congestion – good. People are equally concerned about the impact of new roads. Where does discussion of these figure in the Draft Local plan?***

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

Heritage and the historic environment

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

What is the issue and why is it important?

The Canterbury district has a rich heritage that makes a valuable contribution to the distinctive character of the area, a sense of place, cultural identity and quality of life. The historic environment is an irreplaceable and valuable asset which makes a significant contribution to economic development and tourism, education, regeneration, recreation and leisure, sustainability, and community and cultural development.

Different types of heritage assets are protected, enhanced and managed in different ways, and through different legislation:

- The Planning (Listed Buildings and Conservation Areas) Act 1990
- The Ancient Monuments & Archaeological Areas Act 1979
- The Protection of Wrecks Act 1973

What is the evidence telling us?

National planning policies recognise the historic environment as a key element of sustainable development, and set out that heritage assets are irreplaceable and should be conserved so that they can be enjoyed by existing and future generations.

The high quality of Canterbury's historic environment means that heritage is very important in the district's strategies; including transport, economic development, and culture and tourism.

Our Heritage Strategy combines these strategies into one vision as a way to deliver long-term economic, social and environmental benefits to the district. The Heritage Action Plan outlines a set of objectives looking at safeguarding, promoting, and capitalising on our unique historic environment.

What came out of the consultation?

From earlier consultation, there is a clear agreement that the historic environment is of significant value that should be both protected and enhanced.

Where buildings are empty or not used enough, they should be brought back into use and new development should combine the distinctiveness of the historic environment into new design.

Our heritage also promotes tourism, defines character, boosts our local economy and supports growth. So it's important that our historic environment is preserved and enhanced to continue to contribute to the district's economic, social and environmental success.

How should we do this?

Option NE1A (preferred option) - continue with the current Local Plan approach

The current Local Plan sets out detailed policies for:

- the World Heritage Site
- buffer zone and views
- heritage assets like listed buildings, conservation areas, shopfronts, archaeology and historic landscapes and parks and gardens

We've reviewed these policies and think they are still effective and up to date.

Option NE1B - make changes to the current Local Plan policies

Although we don't think the current policies need updating, you can suggest changes to improve their effectiveness.

How can we protect and enhance our heritage assets?

- Option NE1A (preferred option)** - continue with the current Local Plan approach
- Option NE1B - make changes to the current Local Plan policies

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

.....

.....

.....

.....

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

.....

.....

.....

.....

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

Option NE2A - continue with the current approach which gives general design policies

This approach gives general design policies, but doesn't offer design guidance specifically on encouraging the adaptation and retrofitting of buildings in conservation areas and historic buildings.

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

This approach will give better guidance for adapting buildings in conservation areas and historic buildings, to improve energy efficiency and carbon emissions.

Plans that want to improve energy efficiency or building resilience can be assessed against their suitability for the particular property and against the risk of harming the significance of the heritage asset.

This would make sure the process is carefully managed so that the historic environment and its heritage assets are kept for present and future generations, while also helping tackle and respond to climate change.

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

- Option NE2A - continue with the current approach which gives general design policies
- 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):

If you think there's a better option for improving energy efficiency, let us know:

Protection and enhancement of wildlife and biodiversity

Issue NE3. How should we protect and enhance biodiversity and green and blue spaces like parks and rivers?

What is the issue and why is it important?

We know that wildlife species and habitats are declining globally, and that climate change is one of the factors driving this.

Our district has many sites recognised internationally, nationally and locally for their protected plants, animals and habitats, and 229 of England's most threatened species have been recorded in the district.

These designated sites are protected through existing legislation and national planning policies, and will continue to be protected in the same way through the new Local Plan:

- Ramsar sites (wetlands), special protection areas (SPAs) for birds and their habitats, and special areas of conservation for specific habitats and species of importance are internationally important. They are given the highest level of protection, and we have five in our district
- sites of special scientific interest - with important wildlife or geological value are nationally important and there are 15 in our district
- marine conservation zones - nationally rare or threatened habitats and species in our seas - are nationally important and there are two in our coastal waters
- national nature reserve sites - the finest wildlife and geological sites - are nationally important and there are two in our district
- Royal Society for the Protection of Birds (RSPB) reserves are nationally important and there are two in our district
- local nature reserves (LNRs) are locally important. There are 11 LNRs in our district, which promote nature conservation and increase public enjoyment and understanding of nature
- local wildlife sites (LWS) are locally important. There are 49 LWS representing the local character and distinctiveness and supporting biodiversity
- roadside nature reserves (RNR) are locally important wildlife corridors with scarce or threatened habitats or species. There are nine in our district
- regionally important geological or geomorphological sites (RIGS) are locally important as educational, research, historical or recreational resources. There are five in our district

As we develop the new Local Plan we will complete a Habitats Regulations Assessment (HRA) which will look at whether the plan might affect the protected features of a designated habitat site.

The HRA in the current Local Plan identified that more new development could potentially impact wintering birds because of a potential increase in recreational disturbance. The Thanet Coast and Sandwich Bay SPA and Thames, Medway and Swale SPA strategic access management and monitoring strategies were written to help stop this.

Along with potential impacts to wintering birds, we are aware that there are water quality concerns at the Stodmarsh protected site, and that more development could cause air quality impacts in the Blean complex (woods) conservation area.

The HRA will look at these potential impacts and identify any others, which will then be part of future Local Plan work. HRA options are not proposed at this stage.

The government has recognised the decline and break up of species and habitats, and the Environment Bill is part of their response. The bill is currently making its way through Parliament and is expected to introduce a mandatory requirement for developments to show a 10% improvement in biodiversity - known as biodiversity net gain - for the majority of developments, as well as other measures.

Green and blue spaces (known as infrastructure) are ways to create and enhance wildlife species and habitats. They also have other benefits like helping address climate change, improving health and wellbeing, providing sustainable transport routes, and improving water resources and flood management.

Blue spaces are water elements like rivers, canals, ponds, wetlands and floodplains.

Green spaces include:

- parks, gardens and country parks
- natural and semi-natural urban and rural green spaces like Duncan Downs
- green (wildlife) corridors, like river banks, cycleways, and rights of way
- outdoor sports facilities like playing fields
- amenity green space, like informal recreation spaces, green spaces in and around housing, domestic gardens and village greens
- allotments, community gardens, and urban farms
- cemeteries and churchyards
- accessible countryside in urban fringe areas
- woodlands and trees
- green roofs and walls

What is the evidence telling us?

The Canterbury District Green Infrastructure Strategy 2018-2031 aims to ‘deliver an integrated and multifunctional green infrastructure network covering all of Canterbury district, which supports sustainable development, health and wellbeing and economic growth, as well as providing a distinctive and high quality local environment that is managed and valued by Canterbury’s communities’.

Key actions are identified across the district like the Seasalter Marshes project which is the creation of a Wetlands RSPB nature reservation, and expansion and improvement of the Duncan Downs at Whitstable.

Work is also starting on a district tree strategy and a pollinator plan, as well as biodiversity net gain and local recovery strategies to support the Environment Bill at a local level.

National planning policies make it clear that valued landscapes, sites of biodiversity or geological value and soils should be protected and enhanced through Local Plans. They should be protected according to the importance of their designation.

Consultation on changes to national planning policies that would see blue spaces combined in the definition of green spaces has recently taken place, and the outcomes and implications of these changes will be considered.

What came out of the consultation?

The break up of habitats and limited greenery, particularly in high traffic areas, were concerns.

To help address this, more urban greening and wildlife corridors were suggested. There was also concern over the loss of biodiversity and destruction of ecosystems. However, there wasn't much said on the amount of biodiversity net gain which should be found - whether that should be 10%, 20% or have no limits.

Trees were a key issue, with many people saying that more trees should be planted, and there were concerns about the loss of trees through development and inappropriate management.

How should we do this?

Option NE3A: continue with the current Local Plan approach of new developments providing and extending green spaces (including trees) where they can, and set a 10% biodiversity net gain requirement

The current approach emphasises the importance of green spaces (including trees) being provided through new developments.

Where they can, new developments will provide and establish green space networks to support wildlife and the health and wellbeing of our communities.

This option would support the minimum 10% biodiversity net gain on the majority of new developments, as mentioned in the Environment Bill.

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

This approach would build upon the green spaces and biodiversity net gain options in Option NE1A by also looking to conserve, and where possible, enhance blue spaces.

This option would support the minimum 10% biodiversity net gain on the majority of new developments, as mentioned in the Environment Bill.

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

This option builds on Option NE3B, emphasising the importance of both green and blue spaces.

It would increase the requirement for biodiversity net gain from 10% to 20%. This would support one of the principles in the Kent Downs AONB Management Plan 2020-2025 as well as work at a regional level.

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

- 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
- 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

- ❑ 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

Tell us why you chose this option: **Option NE3C looks better in respect of the biodiversity target of 20% but the option for developments to provide 'new' green space needs more detail. What are the conditions & standards of the new space? It could turn out to be a very poor exchange. I note an earlier point, that "more development could cause air quality impacts in the Blean complex (woods) conservation area". The impact of the Western Bypass is obviously a matter of concern here.**

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

.....
.....
.....
.....

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?

What is the issue and why is it important?

Our district has an exceptionally rich and diverse natural environment, with a variety of important landscapes. This makes the landscape character an important asset which should be reinforced, restored, conserved or improved as appropriate.

The high value of our landscapes has led to several existing local designations to add increased protections in some areas.

One of these designations is areas of high landscape value (AHLVs), also known as local landscape designations (LLDs). AHLVs or LLDs are normally designated for their essential physical, environmental, visual, cultural and historical value in the landscape, which might be unique, exceptional or distinctive to the area.

We have five designations in the current Local Plan:

- North Kent Marshes AHLV
- Wantsum Channel AHLV
- North Downs AHLV
- Blean Woods AHLV
- Canterbury AHLV (the Valley of the River Stour around Canterbury)

In these designated areas, any development must be thought about in relation to the landscape character (for example, it must have no significant impact upon the historic setting, archaeological or nature conservation interests) and should enhance the landscape for the future.

The Canterbury AHLV is slightly different to the other four areas, as it protects the historic landscape setting of the city and the World Heritage Site. The Planning Inspector that assessed the current Local Plan said that the Canterbury AHLV didn't relate to landscape quality, but helped prevent visual damage to the setting of the city.

What is the evidence telling us?

The Landscape Character Assessment and Biodiversity Appraisal (2020) updates our evidence on various character areas in the district and how these can be improved over the period of the new Local Plan.

The AHLV and LLD evidence has also been updated and the Canterbury District Local Landscape Designations: Review and Recommendations report (2021) says that the North Downs LLD, Blean Woods LLD, North Kent Marshes LLD and Wantsum Channel LLD all meet the designation criteria, based on up to date guidance.

The report makes recommendations about updating some existing boundaries and renaming some designations with more locally specific names. There is also a recommendation to create a new Stour Valley Floodplain (east) LLD, to protect the valued landscape associated with the Great Stour and Little Stour rivers.

The Canterbury City AHLV: Review for Local Landscape Designation report (2021) says that the area didn't meet the same criteria as the other LLDs, and that it might be difficult to keep the Canterbury City AHLV designation based on current evidence and guidance.

The report sets out two alternative recommendations: (1) use a strong criteria-based policy to set out key considerations for development proposals, or (2) to keep it, with some boundary changes, as a new type of designation called 'landscape context of Canterbury'.

What came out of the consultation?

Concerns were raised about damage to the natural environment through developments, over development and permitted development, and the loss of green space, open space and open countryside.

How should we do this for the North Kent Marshes LLD?

NE4A - keep the North Kent Marshes LLD identified in the current Local Plan

This option would keep the current North Kent Marshes LLD boundary.

NE4B (preferred option) - keep the North Kent Marshes LLD current boundaries and rename as Seasalter Marshes LLD

This option would keep the current boundary but would rename it to Seasalter LLD, as the existing name came from a county-wide assessment that extends the designation outside of our district boundary.

North Kent Marshes LLD options

- Option NE4A - keep the North Kent Marshes LLD as identified in the existing Local Plan
- Option NE4B (preferred option) - keep the North Kent Marshes LLD current boundaries and rename as Seasalter Marshes LLD

I do not know enough to select.

How should we do this for the Wantsum Channel LLD?

Option NE4C - keep the Wantsum Channel LLD identified in the current Local Plan

This option would keep the current Wantsum Channel LLD boundary.

Option NE4D (preferred option) - keep the Wantsum Channel LLD with the boundary changes suggested

This option would change the boundary of the Wantsum Channel LLD based on the report's recommendations to exclude development and align with the district boundary.

Wantsum Channel LLD options

- Option NE4C - keep the Wantsum Channel LLD as identified in the existing Local Plan
- Option NE4D (preferred option) - keep the Wantsum Channel LLD with the boundary changes suggested

I do not know enough to select.

How should we do this for the North Downs LLD?

Option NE4E - keep the North Downs LLD as identified in the existing Local Plan

This option would keep the current North Downs LLD boundary.

NE4F (preferred option) - keep the North Downs LLD with the boundary changes suggested

This option would change the boundary of the North Downs LLD based on the report's recommendations.

This would mean minor boundary changes because of landscape and developments, and removing the area covered by the Kent Downs Area of Outstanding Natural Beauty (AONB), because the AONB designation is of national importance and provides protection significantly above that of a LLD.

North Downs LLD options

- Option NE4E - keep the North Downs LLD as identified in the existing Local Plan
- Option NE4F (preferred option) - keep the North Downs LLD with the boundary changes suggested

How should we do this for the Blean Woods LLD?

Option NE4G - keep the Blean Woods LLD identified in the current Local Plan

This option would keep the current Blean Woods LLD boundary.

Option NE4H - keep the Blean Woods LLD with boundary changes 1 - 4 and 5i

This option would change the boundary of the Blean Woods LLD to: align it with the landscape (valley floor) (1), remove a solar farm (2), and include three woods: Buckwell Wood (3), Kemberland Wood and Little Hall Wood (4).

The purpose of the landscape designation is to recognise the high landscape value of the woodland, which is also designated as a SAC and a SSSI.

The boundary to the south between the University of Kent and Clowes Wood would extend the designation to incorporate the Sarre Penn Valley, the Crab and Winkle Way and the distinctive church of St Cosmos and St Damian in the Blean, on the ancient salt road to the coast (5i).

This would be a change from the purpose of the Blean Woods LLD as it would include predominantly farmland and horticultural or orchard land uses.

Option NE4I - keep the Blean Woods LLD with boundary changes 1 - 4 and 5ii

This option would make the same changes to 1-4 as above.

The boundary to the south between the University of Kent and Clowes Wood would extend the designation to the valley that marks the rise to the Stour Valley slopes and university, which is roughly inline with the Sarre Penn Valley (footpath).

Although this would be a smaller extension compared to option NE4H it would still be a change from the existing purpose of the Blean Woods LLD as it would include predominantly farmland.

Option NE4J - keep the Blean Woods LLD with boundary changes 1 - 4, and 5iii (Tyler Hill Road)

This option would make the same changes to 1-4 as above.

The boundary to the south between the University of Kent and Clowes Wood would extend along Tyler Hill Road. This would be a smaller extension compared to option NE4H and NE4I, but would still be a change from the existing purpose of the Blean Woods LLD.

Option NE4K (preferred option) - keep the Blean Woods LLD with boundary changes 1-4, and changes between the University of Kent and Clowes Wood

This option would make the same changes to 1-4 as above.

The boundary to the south between the University of Kent and Clowes Wood would be kept as it currently is.

A landscape criteria for this area outside the Blean Woods LLD boundary could make sure that any development proposals in this area take into account the special characteristics and sensitivities of the area.

Blean Woods LLD options

- ❑ Option NE4G - keep the Blean Woods LLD as identified within the existing Local Plan
- ❑ Option NE4H - keep the Blean Woods LLD with boundary changes 1 - 4 and 5i
- ❑ Option NE4I - keep the Blean Woods LLD with boundary changes 1 - 4 and 5ii
- ❑ Option NE4J - keep the Blean Woods LLD with boundary changes 1 - 4, and 5iii (Tyler Hill Road)
- ❑ Option NE4K (preferred option) - keep the Blean Woods LLD with boundary changes 1-4, and changes between the University of Kent and Clowes Wood

It is difficult for a layperson to assess the options. You say that “This would be a change from the purpose of the Blean Woods LLD as it would include predominantly farmland and horticultural or orchard land uses.” Does this change weaken the protections that Blean currently enjoys? How are the SAC and SSSI designations affected by the change in purpose?

How should we do this for the Stour Valley landscape?

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

The LLD report suggested an extra area at Stour Valley Floodplain (east). This option would involve setting out an additional LLD designation, or potentially a descriptive policy, in the new Local Plan to apply to proposals for development in this area.

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

The area of land identified by the report for a Stour Valley Floodplain (east) LLD is already heavily protected because of its ecological importance; including the Stodmarsh SPA, SAC and SSSI.

A high proportion of land is in Flood Risk Zone 2 or 3 (areas most at risk from flooding) which are also protected through national planning policies.

This option would not need an additional local landscape designation in this area, given the national and international protections already there.

Stour Valley landscape options

- 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

I do not know enough to choose.

How should we do this for the landscape currently protected under Canterbury AHLV?

Option NE4N - keep the area with some boundary changes as a new designation - 'landscape context of the historic city of Canterbury'

This option would keep the Canterbury AHLV area broadly as it is with some boundary changes based on up to date evidence, as a new and different type of local designation.

Although it's not a landscape or a heritage designation, this would mean that the area is valued for the role that the landscape plays in views and the setting of the city.

The designation would include areas of different landscape types (valley, wood hills, and so on) which each play different roles as landscape setting, identified with a boundary.

Option NE4O (preferred option) - delete the boundary and replace with a criteria based approach setting out considerations like views, landscape character, and historic setting for development which might impact on the landscape surrounding Canterbury city

The area covered by this designation is important to the character of the historic city, but the landscape is not high quality enough to justify a landscape designation, so other requirements are in place to protect the historic nature of the city.

This option would provide a strong criteria-based approach, linked to the information in the Landscape Character Assessment and Biodiversity Appraisal (2020), to set out what is important in the surrounding landscape and a list of considerations for development proposals to show that any impacts will be addressed.

The defined spatial area would be removed, meaning that the application of the policy would extend further out from the city, but proposals on areas of low quality landscape with no significant impacts on the setting or views would not be impacted greatly.

Canterbury AHLV options

- ❑ Option NE4N - keep the area with some boundary changes as a new designation - 'landscape context of the historic city of Canterbury
- ❑ Option NE4O (preferred option) - delete the boundary and replace with a criteria based approach setting out considerations like views, landscape character, and historic setting for development which might impact on the landscape surrounding Canterbury city

The considerations like views, landscape character etc outlined in NE4O obviously come into play when considering house-building & road building. What weight will such considerations actually have?

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

What is the issue and why is it important?

Green gaps are another local designation which aim to keep the separate identities of certain villages and towns within the district by preventing built up areas from merging together.

National planning policies allow us to identify land where development is inappropriate. Gradual merging can not only harm the character of the open countryside but also negatively impact the setting and special character of villages and coastal towns.

There are eight green gaps in the existing Local Plan:

- between Herne Bay and Whitstable
- between Canterbury and Sturry
- between Sturry and Westbere
- between Sturry and Hersden
- between Sturry and Broad Oak
- between Blean and Rough Common
- between Canterbury and Tyler Hill
- between Canterbury and Bridge

In green gaps most types of development are not allowed, apart from sports and recreational uses. The green gap between Herne Bay and Whitstable also promotes education, outdoor leisure uses and allotments.

In the same way as green gaps, areas of land currently designated as protected open spaces (Policy OS9 in the adopted Local Plan) aim to prevent town cramming and some act as buffers.

These areas of land are different to sites identified in our open spaces strategy; which instead focused on publicly accessible spaces like parks, natural areas and recreation spaces.

These areas of land are currently being reviewed for the next stage of the Local Plan.

What is the evidence telling us?

The Green Gaps and Local Green Spaces Review (2021) reviewed all existing green gaps and local green spaces.

Limited development has happened within the green gaps but some boundary changes were suggested based on the The Landscape Character Assessment and Biodiversity Appraisal (2020), which also gave guidance on the function of existing green gaps.

What came out of the consultation?

Concerns were raised about damage to the natural environment through developments, as well as urban sprawl, the merging of settlements and a desire to keep the separate identities of settlements.

People also mentioned the loss of green space, open space and open countryside.

How should we do this?

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

This option would continue to support recreation and sports within the green gaps.

The larger green gap between Herne Bay and Whistable would continue with its slightly different function and support education, which could benefit both coastal towns.

A criteria would be set across all green gaps to make sure there are no negative impacts on the environment and character of the area from development.

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

This option would allow other specific types of infrastructure (like community and health) which are needed and can't be put elsewhere, to be delivered within these areas.

Residential development would continue to not be acceptable. These would be subject to strict criteria, like design and layout, to make sure there are no negative impacts on the environment and character of the area from development.

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
- 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

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

I do not know some of the listed areas well enough to comment.

.....
.....
.....
.....

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

.....
.....
.....
.....

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

Option NE5C - keep the existing green gap identified in the current Local Plan

This option would keep the existing green gap without any changes to the boundaries.

Option NE5D (preferred option) - keep the green gap with suggested boundary changes to exclude a building to the east

This option would mean changes to the existing boundary to the east of the green gap to remove the existing building.

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

See overall comment above.

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

Option NE5E - keep the existing green gap identified in the current Local Plan

This option would keep the existing green gap without any changes to the boundaries.

Option NE5F (preferred option) - keep the green gap with suggested boundary changes around the garage

This option would mean changes to the existing boundary to exclude the garage site.

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

See overall comment above.

What should we do with the green gap between Herne Bay and Whitstable?

Option NE5G - change the boundary of the existing green gap

Although the Green Gaps and Local Green Spaces review didn't identify or recommend changes to the boundary, it did highlight that there are some areas at the edge of the designation which are not open countryside.

This option could change the boundary to remove some or all of these areas.

Option NE5H (preferred option) - keep the existing green gap identified in the current Local Plan

This option would keep the existing green gap without any changes to the boundaries.

Herne Bay and Whitstable green gap options

- Option NE5G - change the boundary of the existing green gap
- Option NE5H (preferred option) - keep the existing green gap identified in the current Local Plan

See overall comment above.

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

Option NE5I - change the boundary of the existing green gap

The Green Gaps and Local Green Spaces review didn't identify or recommend changes to the boundary, but it did highlight that there are some areas at the edge of the designation proposed for development as part of the strategic site at Broad Oak.

This option could change the boundary to remove some or all of these areas.

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

This option would keep the existing green gap without any changes to the boundaries.

Sturry and Broad Oak green gap options

- Option NE5I - change the boundary of the existing green gap
- Option NE5J (preferred option) - keep the existing green gap identified in the current Local Plan

See overall comment above.

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

Option NE5K - change the boundary of the existing green gap

The Green Gaps and Local Green Spaces Review didn't identify or recommend changes to the boundary, but it did highlight that there are some areas surrounding the green gap which could prevent the two settlements merging. This option could change the boundary to include some or all of these areas.

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

This option would keep the existing green gap without any changes to the boundaries.

Canterbury and Tyler Hill green gap options

- Option NE5K - change the boundary of the existing green gap
- Option NE5L (preferred option)** - keep the existing green gap identified in the current Local Plan

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

Option NE5M - change the boundary of the existing green gap

The Green Gaps and Local Green Spaces review didn't identify or recommend changes to the boundary, but it did highlight that there are some areas at the edge of the designation which are not open countryside.

This option could change the boundary to remove some or all of these areas.

Option NE5N (preferred option) - keep the green gap and think about opportunities to change the boundaries

This option would keep the existing green gap without any changes to the boundaries.

Canterbury and Bridge green gap options

- Option NE5M - change the boundary of the existing green gap
- Option NE5N (preferred option)** - keep the green gap and think about opportunities to change the boundaries

See overall comment above.

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

Option NE5O - change the boundary of the existing green gap

The Green Gaps and Local Green Spaces review didn't identify or recommend changes to the boundary, but it did highlight that there are some areas at the edge of the designation which are not open countryside.

This option could change the boundary to remove some or all of these areas.

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

This option would keep the existing green gap without any changes to the boundaries.

Canterbury and Sturry green gap options

- Option NE5O - change the boundary of the existing green gap
- Option NE5P (preferred option) - keep** the existing green gap identified in the current Local Plan

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

Option NE5Q - change the boundary of the existing green gap

The Green Gaps and Local Green Spaces review didn't identify or recommend changes to the boundary, but it did highlight that there are some areas at the edge of the designation which are not open countryside.

This option could change the boundary to remove some or all of these areas.

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

This option would keep the existing green gap without any changes to the boundaries.

Blean and Rough Common green gap options

- Option NE5Q - change the boundary of the existing green gap
- Option NE5R (preferred option) - keep** the existing green gap identified in the current Local Plan

What should we do about new green gaps?

Option NE5S - think about opportunities to identify new green gaps

The Green Gaps and Local Green Spaces review didn't recommend any new green gaps, but there might be new areas which should be protected to prevent settlements merging and causing negative impacts on their setting and special character.

New green gaps options

- Option NE5S** - think about opportunities to identify new green gaps
- Option NE5T - (preferred option) don't designate new green gaps

Yes, definitely think about identifying new green gaps. eg the green gap between Rough Common & the north of Canterbury, formed by Dukes and Neal's Place Meadows?

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

What is the issue and why is it important?

The Kent Downs Area of Outstanding Natural Beauty (AONB), which is a nationally important landscape designation, covers around 27% of our district, and the destination protects the distinctive character and natural beauty of the exceptional landscape.

Our district is also one of the most wooded districts in south east England, with around 14% covered by ancient woodland. We also have 21.6 km of coastline which provides natural beauty from the various coastal landscapes.

One important aspect of landscape character and tranquility is dark skies - areas with low to no light pollution. In the district; particularly in the Kent Downs AONB to the south and at Blean Woods to the north, there are areas with very low levels of light pollution where dark skies can be experienced.

Minimising the impact of light pollution is important as external lighting can harm residential homes and biodiversity. However, there is also demand for artificial lighting for safety (for example, road schemes), crime prevention like security lighting and leisure activities that use flood lights, for example.

This makes light control a key design consideration in development proposals, particularly for developments in areas of darker skies. Obtrusive light is normally because of poorly designed or insensitive lighting schemes. The main problems are:

- sky glow - the orange glow around some urban areas
- glare - the uncomfortable brightness of a light source against a darker background
- light trespass - light spilling beyond the boundary of the property where it is not wanted or needed

What is the evidence telling us?

The Landscape Character Assessment and Biodiversity Appraisal (2020) also reviewed dark skies and tranquility across the entire district, identifying areas in the AONB, Blean Woods, Seasalter Marshes (north west of the district), and areas to the east of the district, as having the darkest skies and highest level of tranquility within the district.

The Kent Downs AONB management plan gives principles and guidance for any activities or developments within the AONB.

What came out of the consultation?

Concerns about light and noise pollution and their negative impacts on wellbeing and the natural environment were raised.

Protecting areas of tranquility and dark skies was suggested as a solution.

How should we do this?

Option NE6A - continue with the current Local Plan approach of using a design criteria when assessing outdoor lighting proposals

The current Local Plan provides a list of criteria which proposals for new outdoor lighting have to show they meet through their planning application.

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

This option would take a more proactive approach to make sure that new development does not impact dark skies, which are an important part of landscape character and tranquility, and contribute to the quality of life in these areas.

Where possible, development proposals should support the restoration and improvement of areas to enhance and or extend dark skies.

How should we manage outdoor lighting to support tranquility?

- Option NE6A - continue with the current Local Plan approach of using a design criteria when assessing outdoor lighting proposals
- Option NE6B (preferred option)** - include clear requirements for development proposals to conserve or enhance the tranquility provided by dark skies

Tell us why you chose this option (outdoor lighting):

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

.....

Provision of open space, recreation and leisure facilities

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

What is the issue and why is it important?

Open spaces enhance the quality of life of our communities, providing spaces to relax, socialise and exercise. Many of these spaces play an important role in supporting biodiversity and connecting our communities with nature, and support health and wellbeing.

Open spaces are publicly accessible areas of land which fall into the following categories or 'typologies':

- parks and gardens - including urban parks, country parks, formal gardens and historic parks and gardens
- semi-natural and natural open space - including woodlands, urban forestry, scrub, grasslands, wetlands, open and running water, wastelands, derelict open land, and rock areas (cliffs, quarries and pits)
- beach - we understand the importance of the beach and the valuable contribution it makes to leisure, recreation and the environment, so we view it as a category of open space in its own right
- green corridors - including riverside areas, footpaths, cycleways, bridleways and other rights of way
- outdoor sports facilities – including public or private playing fields, tennis courts, bowling greens, sports pitches, golf courses, athletics tracks
- amenity greenspace - including informal recreation spaces and greenspaces normally found in a residential area and around housing
- provision for children and young people - this is split into different subcategories depending on the type of equipment and targeted age ranges, but in general includes equipped play areas and skateboard areas
- allotments - a piece of land which can be rented out for growing fruit and vegetables
- cemeteries, disused churchyards and other burial grounds - areas which are valuable for contemplation, informal recreation, wildlife conservation and biodiversity
- civil space - civic and market squares and other hard surfaced areas designed for pedestrians, which have a range of recreation functions, like Gorrell Tank car park in Whitstable and the High Street in Canterbury, which hold markets

Open spaces have many positive benefits, providing meeting places for people of all ages, and supporting social inclusion.

They often provide areas for physical exercise, sports and recreation; supporting the health and wellbeing of our communities. Many provide off-road walking and cycling routes, support community and economic development and contribute to the identity and sense of place and community.

They also support wildlife and biodiversity connecting habitats and wildlife, provide surface water drainage and can improve air quality.

We identify, assess and decide the shortfall and future need for the different types of open space as part of an open space strategy which supports the Local Plan.

We also have two areas designated as local green spaces within the existing Local Plan:

- Prospect Field in Joy Lane, Whitstable
- Columbia Avenue recreation ground in Whitstable

Local green space designations provide special protection for green areas of particular importance to local communities.

We have the opportunity to review local green space sites through the new Local Plan, but most green areas or open spaces in the district will not meet the strict criteria set in national planning policies. A green space must be:

1. reasonably close to the community it serves
2. special to a local community and hold particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or wildlife
3. local in character and not an extensive area of land

What is the evidence telling us?

The Open Space Strategy (2014- 2020) is being updated and this will review existing open space in the district and identify any shortfalls, as well as update the open space standards for new developments.

There are allocations within the current Local Plan for playing fields and allotments which will need to be reviewed through the new strategy for the next stage of the Local Plan.

Part of the strategy work includes reviewing the 'protected open space' designated sites, and there might be opportunities to make sure they are being protected appropriately, as well as publicly accessible open space and other designations like green gaps.

The Canterbury Playing Pitch Strategy and Action Plan (October 2020) updates our evidence on outdoor sports provision in the district.

It identifies existing shortfalls of youth football pitches (11v11 and 9v9), rugby union pitches, and access to additional outdoor netball courts for summer youth netball. There would also be a potential shortfall in adult football pitches, cricket pitches and a 3G pitch (probably in Herne Bay) for team training.

The strategy, developed with local stakeholders and Sports England, will be used in the relevant parts of the open space strategy and later stages of the Local Plan.

The Indoor Sports Facilities Strategy (October 2020) identifies the need to support existing clubs and make sure they continue to have access to appropriate facilities. In particular, gymnastics, roller hockey, indoor bowls and table tennis might need support with improving or moving existing facilities. We will use this information in the next stage of the Local Plan.

The Green Gaps and Local Green Spaces Review (2021) reviewed all existing green gaps and local green spaces. It confirmed that there had been no development in local green spaces, or any substantial changes.

What came out of the consultation?

There were many comments including:

- the loss of open spaces due to development
- inappropriate management of open spaces

- inappropriate use of open spaces
- lack of open space in the district
- poor access to open space
- a lack of well-equipped childrens play areas and publicly available tennis courts or other exercise spaces

Lots of suggestions were put forward including creating a large park which could have several functions like a lake or public tennis courts, more local green spaces, more allotments, community gardens and urban farms, and well equipped children's play areas and outdoor gym equipment.

Suggestions for a Heritage Country Park at Fordwich and a Stour Valley Regional Park were mentioned. Designations of this type involve a detailed application process in line with strict criteria set by the government and Natural England.

Although this hasn't happened yet, they will be considered if needed in later stages of the new Local Plan.

We recognise that improving the quality and quantity of open spaces will be a key feature of the new Local Plan, so background work on this is being developed in our new open spaces strategy and this work will be reflected in a later stage of the new Local Plan.

At this stage it is helpful to look at some key issues around the protection of existing open space.

How should we do this?

Open spaces like parks, natural areas and allotments play an important role in community life, and contribute significantly to the quality of life of residents. Although those areas of land identified through Policy OS9 are protected, many of these important community assets don't currently have any protection within the Local Plan.

These options focus on open spaces which are usable and publicly accessible - areas which fall into the categories or typologies used for the open space strategy.

Option NE7A - continue with the existing approach

Sites like play areas and semi-natural spaces are normally not identified in the Local Plan for specific protection, as it instead focuses on protecting playing fields, allotments and open space provided through new developments.

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

This option would take a more proactive approach to protecting our open spaces.

Through the open spaces strategy work, open spaces will be identified, assessed and mapped. This will then allow them to be identified on maps and protected through the new Local Plan.

If a development proposal could lead to the loss of open space, any application would need to meet strict criteria, for example, that the space was no longer needed, and that the loss would be compensated for.

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

- Option NE7A - continue with the existing approach
- 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

Tell us why you chose this option (protecting open space):

Neither option is satisfactory. Yes, it is a positive step to identify and protect open spaces, but it sounds as if this protection could be easily revoked & the open space lost if certain criteria – as yet unspecified - are met. This kind of protection is not worth much.

If you think there's a better option for protecting open space, let us know:

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

Option NE8A - keep the current approach

This option would keep the current approach of looking for a balanced contribution of open space in line with the open space standards, with proportionate amounts of each type of open space.

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

Where there is a particular need for a specific sports facility, this option would allow us to rebalance open space provision from developments.

For example, there are identified shortfalls of youth 11v11 football pitches in the north rural analysis area, and youth 9v9 pitches in the Canterbury city, Herne Bay, north rural and Whitstable analysis areas.

So open space provision as part of new developments in this area would be focused on addressing that, while still making sure that the overall requirement for open space provision from a development is reasonable and proportionate.

Outdoor sports and recreation options

- Option NE8A - keep the current approach
- Option NE8B (preferred option)** - consider prioritising sport facilities where there is an identified lack of them

Tell us why you chose this option (accessible sports):

.....

.....

.....

.....

If you think there's a better option for supporting accessible outdoor sports, let us know:

.....
.....
.....
.....

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

Option NE9A - consider removing the existing local green space

This option would remove the designations at Prospect Field and Columbia Avenue in Whitstable, if there is evidence to show that the sites no longer meet the strict criteria set out in national planning policies.

However, the Green Gaps and Local Green Spaces Review (2021) doesn't suggest any changes here.

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

This option would keep the existing local green spaces in Whitstable.

Through the development of the new Local Plan there might also be opportunities to assess the potential for more green spaces in the district, where areas have the potential to meet the strict criteria set out in national planning policies.

Green space approach options

- Option NE9A - consider removing the existing local green space
- 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):

Keep those already identified and look at identifying additional local green spaces.

If you think there's a better option for approaching local green spaces, let us know:

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?

What is the issue and why is it important?

The water environment is incredibly important in our district; supporting wildlife and biodiversity, as well as the health and wellbeing of our communities.

For example, the River Stour is the second longest river in Kent, and as a chalk river, it is one of only 200 examples of this rare habitat in the world.

Along our 21.6 kilometres of coastline there are some areas at Seasalter, Swalecliffe, Bishopstone and Reculver which have great scientific interest and recreational value. These attractive areas of undeveloped coast are currently protected through the Local Plan as undeveloped coast and will continue to be.

Other areas of the coast are protected through zonal protections:

- overtopping hazard zone (waves coming over sea defences) - development is not allowed in an area at Faversham Road in Seasalter as it is at risk of overtopping from the sea, meaning that buildings can be damaged by waves
- coastal protection zone - at Studd Hill and Eastcliff in Herne Bay there are areas where the cliffs and coastal slopes are not stable because of erosion. Developments in certain areas could make the situation worse and affect future works, so for public safety, development is normally not allowed

Some areas of our district are at risk of flooding, and surfaces like roads, footpaths, paved gardens, driveways and roof slopes can contribute to this by not allowing water through.

Sustainable drainage systems (SuDS) aim to minimise the risk of flooding by allowing water to soak into the soil underneath, or even hold the water temporarily to prevent it over filling drains or rivers.

SuDS can also enhance and support wildlife, biodiversity and habitats and support the efficient use of clean water. Examples of SuDS include:

- bioswales or swales - a small dip in a piece of land which directs water through soil and vegetation before joining a drain
- soakaways - a hole filled with rubble which temporarily stores water before draining away
- permeable pavement - using a design or different material which allows water to seep through to the soil below
- ponds, ditches, and retention or detention basins - areas which can start as wet or dry and provide space for excess water to be stored
- wetlands - a habitat which can support large volumes of water
- green roofs - slows down runoff and filters rainwater as it falls

We live in a water stressed area, meaning at certain times of the year our demand for clean water exceeds the amount of water available. With the impacts of climate change, the protection of groundwater is important to reduce the chance of water shortages.

Existing national legislation aims to protect water from pollution:

- groundwater protection zones - areas where the groundwater is at risk from pollution contamination. In England, groundwater provides a third of our drinking water, but in our district this is much higher at 80%

- drinking water safeguard zones - areas where water is used as drinking water and the use of certain substances (including fertilisers, pesticides or other chemicals) must be carefully managed to prevent pollution
- nitrate vulnerable zones - areas at risk from agricultural nitrate pollution

What is the evidence telling us?

The Landscape Character Assessment and Biodiversity Appraisal (2020) identifies the existing area of undeveloped coast at Seasalter, Swalecliffe, Bishopstone and Reculver as a part of the landscape which should continue to be conserved.

The Environment Agency regularly reviews and updates the flood risk zones. These amendments will be taken into account during the update of the 2019 strategic flood risk assessment and the new Local Plan.

Other plans have been, or are being, produced, like the South East Marine Plan and the Isle of Grain to South Foreland Shoreline Management Plan. The implications of these will be considered in the new Local Plan.

National planning policies set clear requirements for Local Plans to take full account of flood risk and coastal change, including climate change.

Inappropriate development in areas at risk of flooding should be avoided and SuDS should be incorporated where needed. Local Plans should also contribute to and enhance the natural and local environment by preventing development from contributing to water pollution.

We are aware that there are water quality concerns about the Stodmarsh protected site. As we develop the new Local Plan we will complete a Habitats Regulations Assessment (HRA) which will determine if the plan might affect the protected features of a designated habitat site: Ramsar; special protection areas (SPAs); special areas of conservation (SACs), and European marine sites.

The HRA is ongoing and will look at any impacts, which will then be thought about in future Local Plan work. HRA options are not proposed at this stage.

What came out of the consultation?

Many people raised concerns over the increased risk of flooding due to climate change, hard landscaping in new developments and the creation of driveways at existing properties that have resulted in the loss of greenspace and an increase in the amount of water runoff.

They also commented that SuDS schemes are not effective and more could be done to enhance designs to increase their other benefits.

More careful management of surface water drainage, more permeable paving and keeping areas of grass or other green infrastructure to help drainage were some of the options suggested.

It was widely recognised that our district is a water stressed area and there were concerns over water supplies and potential shortages and water pollution including from nutrients, waste and rubbish.

How should we do this?

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

This option would refuse all developments in these zones, which are identified through the most up to date evidence.

Option NE10B (preferred option) - think about allowing coastal defences for individual properties in these zones

Coastal defences for individual properties would not change the fact that these zones are at risk of erosion and falling into the sea or overtopping.

Personal coastal defences are unlikely to make any long term difference to protection, especially in the face of a changing climate.

Further investigation and discussions with partners and stakeholders would be needed to make sure safety and sustainability was met; including a requirement to show that work would not make the situation worse or affect the delivery of future strategic works.

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

- Option NE10A - keep the current Local Plan approach of preventing all development within coastal protection and overtopping hazard zones
- Option NE10B (preferred option)** - think about allowing coastal defences for individual properties in these zones

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

If you think there's a better option for coastal and overtopping zones, let us know:

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

Option NE11A - keep the current approach to require enough drainage and encourage major developments to design SuDS that include other benefits

The current approach is focused on having enough drainage, and only on major developments are SuDS encouraged to be designed with other benefits.

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

This option would mean that all appropriate developments are encouraged to provide SuDS, and that they are designed to have as many benefits as possible.

Guidance could be given to help this.

Sustainable drainage systems options

- Option NE11A - keep the current approach to require enough drainage and encourage major developments to design SuDS that include other benefits
- 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

Tell us why you chose this option (SuDS):

Drainage to prevent groundwater flooding is already inadequate. It is very difficult indeed to get a response to drainage / groundwater flooding problems from the relevant authority, be it Southern Water, CCC or the various agencies. It would be a dereliction of duty to allow up to 17000 new houses to be built when existing problems are not being proactively tackled.

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

.....

Issue NE12. What should we do about groundwater protections?

Option NE12A - keep the existing approach of having groundwater protection zones

This relies on other existing legislation like the Water Directive - no specific requirements are set out in the Local Plan itself

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

This option would take a more proactive approach to developments in these areas, setting out clear criteria on the types of development which might be supported and making sure that they don't create adverse impacts.

Further information and guidance would be given to support applicants.

Groundwater protection options

- Option NE12A - keep the existing approach of having groundwater protection zones
- Option NE12B (preferred option) - set clear requirements for development proposals in groundwater protection zones, nitrate vulnerable zones and drinking water safeguard zones

See previous comments on drainage.

Tell us why you chose this option (groundwater protection):

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

.....

.....

.....

.....

