

1) Draft vision and growth options

The district vision by 2040

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

(the ratings throughout the questionnaire are:

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

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

✓ **Strongly agree**

The County Council is supportive of the ‘district vision by 2040’, which identifies a range of priorities around connectivity, health, economic resilience and an enhanced historic and natural environment, all of which will be crucial in ensuring that good growth is delivered, and that it creates places that people will want to work and live in.

As mentioned in its response to the “Issues” Regulation 18 consultation last year, taking an “Infrastructure First” approach to growth is advocated by the County Council and is also embedded in the Kent and Medway Infrastructure Proposition; a proposed deal with Government for new infrastructure investment that will enable accelerated housing delivery, focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need, now and in the future. It is crucial for an “infrastructure first” approach to be applied to planned growth in the district - commitment to close collaboration between key partners will be essential to ensure that good growth is planned, funded and delivered in a timely manner. The County Council welcomes Canterbury City Council’s support of this approach and its intention (under preferred option HCN16) to take such an approach to ensure that clear requirements for necessary infrastructure are provided at the right time and to explore opportunities to deliver critical infrastructure ahead of development.

Working closely with KCC and other infrastructure providers will be critical in achieving this. Particularly, it will be vital in ensuring viability of delivery, whilst also ensuring the necessary infrastructure can be delivered. KCC anticipates that as the Local Plan develops, full provision will be made for the infrastructure required to support new development to ensure that all future site allocations in the Local Plan are both viable and deliverable, and so the County Council looks forward to continued close working with the City Council as the Local Plan progresses, the site selection process develops and the costs, funding options and delivery of the necessary infrastructure are also assessed.

At present, the twelve strategic site allocations in the adopted Local Plan use section 106 agreements to secure developer contributions. The County Council would strongly request a continuation of this approach for the emerging Local Plan and for any new identified strategic allocated sites that come forward. Section 106 agreements are effective in securing funding and direct provision of infrastructure for these sites, giving certainty that, as developments progress, they provide the necessary funding towards schools, roads and other services.

Heritage and Conservation: The County Council would recommend that the paragraph entitled “Growth centred on Canterbury” should be reworded, as it currently reads as two goals joined together without any real link between the desire to focus growth on Canterbury and the historic and natural environment. The need to conserve and enhance environment is relevant for the entire district and for all growth areas, not just Canterbury. A better approach would be to separate out the environment aspects into a separate, more general, environmental goal.

Our 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
- Make sure housing is of high quality design, low carbon and energy efficient, with access to community facilities and open space
- Create a thriving economy with a wide range of jobs, including more high paid jobs, to support increased

✓ **Strongly agree**

All of the Strategic Objectives are strongly supported by the County Council. They encapsulate the crucial elements that will be required to ensure that the district is in a strong place to deliver good growth up to 2040 and to create places that people will want to work and live in.

Climate change and sustainability ambitions feature strongly, which is particularly supported. The Kent and Medway Energy and Low Emissions Strategy seeks to ensure that the decisions and plans embrace clean growth and allow the development of a clean, affordable and secure energy future. This can only be achieved through informed planning decisions, good quality sustainable design, investment in new technologies and cleaner fuels. KCC is supportive of the Plan’s approach to sustainable development, which features all the way through the consultation document. The Local Plan’s commitment throughout (and captured at high level in these Strategic Objectives) to support the transition to a zero-carbon economy to promote environmental sustainability, through requiring high standards of energy and water efficiency,

opportunities for everyone - 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 - 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 - 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 - 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 - 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 - 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 - Create accessible vibrant town centres, maximising digital connectivity, for residents, visitors and businesses to shop, stay and enjoy their leisure time - Protect and enhance our rich environment, creating spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities - Adapt to and reduce the impacts of climate change by making sure new development is highly energy efficient and encourages low carbon lifestyles	improving climate change resilience, incorporating green infrastructure and supporting innovative low carbon transport options and renewable energy is particularly welcomed. Measures align with and support the priorities of the Kent Environment Strategy and the Kent and Medway Energy and Low Emissions Strategy, which sets a vision for achieving net-zero carbon emissions by 2050. KCC supports the objective to protect and enhance the rich environment. Key to this will be delivering nutrient neutrality to protect Stodmarsh National Nature Reserve. KCC would encourage the City Council to develop a nutrient neutral Local Plan and incorporate the necessary infrastructure into the plan to facilitate the delivery of nutrient neutrality at the lowest cost to developers. The County Council would also support the City Council to provide opportunities through the Local Plan to support any work necessary to help Stodmarsh recover and thus end the need for nutrient neutrality in the catchment and enhance the local environment. Heritage and Conservation: KCC is very supportive of the objective to “<i>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</i>”
Growth options	
How much do you agree or disagree with the preferred option? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree	✓ Strongly agree The County Council is supportive, in principle, of the preferred option, focusing growth in Canterbury. It is recognised that at this Regulation 18 stage, the strategic option does not currently have the site allocation details that will be essential to understand and plan for the infrastructure upgrades needed. As such, KCC would request ongoing communication with the City Council if this option is progressed. This is because where strategic development options are of considerable scale, it will be critical that KCC services are considered at an early stage and that they are commensurate with the scale of the development and future proofed to cater for the growing community. It will be important that for such a growth focus on Canterbury, care will need to be given to ensure that this is not done at the expense, or neglect of, critical infrastructure needs across the district as a whole. KCC would welcome conversations in respect of the identification of necessary infrastructure, its funding and its delivery, as appropriate, as the Local Plan process progresses to Regulation 19 stage. It is also noted that the exact details of the A28 improvements, including how it will be funded and costed and what the range of potential environmental impacts, have not yet been determined as part of this consultation. As such, the County Council would emphasise that it supports this approach in principle but recognises that this option will be subject to viability and environmental impact assessments. The land

	and route costs, the plotting of an exact route, the costs associated with the option overall and the environmental impacts will all need to be fully considered and defined and the County Council will welcome continued close engagement as this work is progressed. With the level of growth proposed, it will be essential to ensure that new development takes into account existing settlements and to ensure that master-planning looks to retain the identity of existing communities. Highways and Transportation: KCC as the Local Highway Authority is supportive of the preferred option. The County Council has previously set out, in its response to the ‘Issues’ Regulation 18 consultation in 2020, the existing issues of congestion within the inner ring road and as such, is fully supportive of the ambitious and bold strategy proposed within this consultation. Improvements to the A28 that facilitate transport mode choices, both within the city and beyond, are an essential requirement of further growth within the Canterbury District and the County Council looks forward to working with the City Council on this further. The County Council has welcomed the early engagement with the City Council as the emerging Local Plan work has been developing, and, following a collaborative approach to transport modelling, it is agreed that, of the options assessed, the emerging preferred option offers the best transportation resilience for growth. The preferred option is in strong accord with national and local policies for active travel and use of public transport and will provide greater opportunities for environmental and health improvements within the city that should enrich its experience for visitors and lifestyle of residents. The vision clearly sets out that the option is designed to improve highway space within the city, so as to provide the necessary infrastructure for improved walking, cycling and bus networks. Improvements to the A28 will provide a step change in transport for residents and visitors to the city and KCC positively endorses the brave and positive vision proposed. The improvements to the A28 will also offer desired improvements of accessibility between and to the three East Kent Trust hospitals. Continued support for Park & Ride is welcomed and this remains a key component to supporting radial vehicular routes. The promotion of development that enables residents to access day to day services and facilities within 15 minutes will reduce demand for travel and enable active communities and this is particularly welcomed. In supporting national and local policy, the preferred option provides far greater opportunity for external funding, as well as the ability to expedite the benefits gained from active travel and safe community streets. The County Council is fully supportive of the promotion of active travel, which is in line with the KCC Active Travel Strategy and will look to work closely with the City Council to help ensure that this is planned and delivered. Public Rights of Way (PRoW): It is requested that KCC is involved at the earliest stages if this option is progressed as the upgraded route is highly likely to cross Rights of Way and KCC would obviously wish to avoid routes being truncated causing fragmentation of the PRoW network. In the light of increased development, a PRoW aim is to create connectivity across the wider area and this must be ensured. Education: The County Council will work closely with the City Council as the Local Plan is progressed and site selection is undertaken, and can advise at this stage, for a growth strategy of 14,000 new homes, the following provision will need to be made for school places: - Early Years: 26 place nursery to be included in all new 2FE primary schools, as well as provision of premises elsewhere in the new developments to enable early years/pre-school providers to create increased capacity in the sector - Primary: 9 2FE sites of 2.05 ha each - Secondary: 2 secondary school sites (7FE) of 9.7ha each, as well as a satellite grammar site (4-5FE) of 6-7ha. - SEN provision: 1 (2.05ha) site for SEN provision KCC does also require premises that can be leased or let to nursery and early years/pre school providers who are crucial to enabling parents back into employment. The nursery classes attached to schools do not provide for the younger babies and toddlers that the pre-school providers (mostly private and voluntary sector) cover. Other County Council community services: The County Council advises that the following requirements will need to be taken into account for a growth scenario of 14,000 dwellings:
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	- Waste: Financial contributions towards increasing capacity at Household Waste Recycling Centres serving the district, including those out of district (as outlined in more detail below) - On-site community facilities: Facilities should be dementia friendly with the appropriate decoration and signage. A catering area must be compliant with the Equality Act and include adjustable height work surfaces, wash areas, cupboards etc. Toilets and changing facilities for the severely disabled should be in accordance with the Changing Places specification set out in Kent County Council's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed which are compliant with the Equality Act. - Broadband: All Homes to have Fibre to the Premise (FTTP) connections - Youth: Additional IT, equipment and resources to enable outreach youth services in the vicinity of new developments - Libraries: Financial contributions towards increasing capacity at existing facilities - Community learning: Financial contributions towards increasing capacity via existing facilities and outreach services - Social services: All homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2). Financial contributions towards increasing service capacity in the district. Waste: KCC, as Waste Disposal Authority, would emphasise the need for waste management to be considered as necessary infrastructure to support development. Recognition of the impact that new development has on existing waste facilities is key to ensuring a sustainable service for all is maintained. Whilst KCC has currently secured waste transfer station capacity for the short term, an increase in demand for this service over the lifetime of the Local Plan period, up to 2040, is likely to require investment in infrastructure – and even more so if the preferred option for growth for 14,000 to 17,000 houses is progressed. Demand on the Household Waste Recycling Service in East Kent is already high, with projects identified at several sites to help increase capacity. Since the last Regulation 18 consultation, KCC as Waste Disposal Authority has developed an evidence-based document detailing its approach to requesting financial contributions from developers for these essential waste infrastructure projects. The County Council would reiterate that KCC as Waste Disposal Authority provides a network of Waste Transfer Stations (WTS) for the receipt of kerbside collected waste. These are large strategic sites, with a single WTS currently serving the whole of the Canterbury District. As such, the spatial distribution of the proposed housing is unlikely to be of concern for this aspect of our service, as all waste, wherever it is collected, will go to this one facility. KCC also provides a network of eighteen household waste recycling centres (HWRC) located across Kent. These sites provide facilities for reuse, recycling and safe disposal for a range of materials delivered by Kent residents. Residents are free to choose which HWRC they visit, regardless of which district it lies within. Typically, residents choose a site based upon ease of access. This can be influenced by a number of factors including distance, site capacity or range of materials accepted. There are currently two HWRCs within the Canterbury District, located at Vauxhall Road (Canterbury) and Herne Bay. These two HWRCs are very busy, though pressure on these sites is being managed in the short to medium term by creating additional capacity at HWRCs just outside the Canterbury District. However, if significant growth occurs in Canterbury or Herne Bay, then additional capacity at these sites is likely to be required within the lifetime of the plan period. The Herne bay HWRC was redeveloped fairly recently to provide a modern facility, so there is little scope to extend it further. However, the Canterbury HWRC site does have more potential for expansion, and this is something to be considered across the lifetime of the new Local Plan. KCC would welcome further discussions on this matter. In accordance with the National Planning Policy for Waste and the Kent Minerals and Waste Local Plan (KMWLP) Policy CSW 3, KCC requests that all new developments promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. KCC requests that all new developments promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. This should include ensuring that there is appropriate consideration for residents to be able to segregate their waste to allow for recycling opportunities, including those who live in apartments. Natural Environment: This level of housing growth will increase the risk to Stodmarsh Natural Nature Reserve. in supporting this level of growth, KCC would encourage the City Council to develop a Local Plan that delivers nutrient neutrality and helps to enhance the nature reserve to ensure the relevant infrastructure is in place or can be delivered to protect the natural environment. Sustainable communities: The delivery of this level of growth will need to be carefully assessed against the climate change objectives to ensure and demonstrate that the proposed high levels of growth across the district in this preferred option will still enable the delivery of the area's Net Zero target. Whilst the Local Plan policies seek to mitigate the direct carbon impact of new developments, the secondary impact
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	from consumption, travel and associated infrastructure will generate emissions that cannot easily be offset through the planning process and this will need to be assessed. Minerals and Waste: The County, as Minerals and Waste Planning Authority, provided comments to the previous Regulation 18 consultation, which remain valid. The Local Plan should recognise that the Kent Minerals and Waste Local Plan (KMWLP) 2013-30 (as Partially Reviewed) has safeguarding policies for economic land-won minerals and waste management and mineral handling, processing and transportation infrastructure (as set out by Policies CSM 6, CSM and CWM 16 of the KMWLP). Any future allocations identified by the Local Plan should take this into account and where the presumption to safeguard be found to be in conflict with the Local Plan's proposed allocations then Minerals and/or Infrastructure Assessments that successfully invoke and exemption to this presumption (as set out by Policies DM 7 and DM 8 of the KMWLP) would have to be demonstrated as evidence to support any such proposed allocations. KCC would be happy to discuss this further with Canterbury City Council, as appropriate.
How much do you agree or disagree with Canterbury focus A? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree	✓ Neutral The County Council notes that this option would deliver the homes needed to meet Government targets and would involve reallocation of road space on the ring road and investment in Park & Ride and bus infrastructure, which is supported. There is concern however that this option would not satisfactorily address the congestion issues around the city centre without the much needed upgrades to the A28 to enable through-traffic to bypass the city centre. With less housing growth delivered, the substantial investment in infrastructure (particularly the transport infrastructure within Canterbury) would not be delivered and the transport benefits would be much less tangible. The County Council is therefore less supportive of this growth option compared with the preferred option. For this growth strategy proposing the provision of 9,000 dwellings, the County Council would seek the following: - Early Years: 26 place nursery to be included in all new 2FE primary schools, as well as provision of premises elsewhere in the new developments to enable early years/ pre-school providers to create increased capacity in the sector - Primary: 6 (2FE) sites of 2.05ha each - Secondary: 1 secondary school site (8FE) of 11.0ha and one satellite grammar site (4-5FE) of 6-7ha. - SEN provision: one (2.05ha) site - Waste: Financial contributions towards increasing capacity at Household Waste Recycling Centres serving the district, including those out of district. - On-site community facilities: Design that is Dementia friendly with dementia friendly decoration and signage. A catering area which accord with the Equality Act, including adjustable height work surfaces, wash areas, cupboards etc. Toilets and changing facilities for the severely disabled in accordance with the Changing Places specification set out in Kent County Council's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed which accord with the Equality Act. - Broadband: All Homes to have Fibre to the Premise (FTTP) connections - Youth: Financial contribution towards additional IT, equipment and resources to enable outreach youth services in the vicinity of new developments - Libraries: Financial contributions towards increasing capacity at existing facilities - Community learning: Financial contributions towards increasing capacity via existing facilities and outreach services - Social services: All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2). Financial contributions towards increasing service capacity in the district KCC does also require premises that can be leased or let to nursery and early years/pre-school providers who are crucial to supporting parents back into employment. The nursery classes attached to schools do not provide for the younger babies and toddlers that the pre-school providers (mostly private and voluntary sector) cover.
How much do you agree or disagree with Canterbury focus B? ☐ Strongly agree ☐ Agree ☐ Neutral	✓ Agree KCC notes that this option also looks to deliver 14,000-17,000 new homes, with growth focussed in Canterbury. This option has the potential to facilitate further economic growth and enable significant investment in the local transport network and significant upgrading of the A28, alongside investment in bus infrastructure - which is supported. However, it is understood that this option would not include the public realm and open space improvements, and the redesign of movement within the city, so the full benefits that would be derived from the preferred

☐ Disagree ☐ Strongly disagree	option would not be delivered under option B. For this growth option, which looks to deliver a minimum of 14,000 dwellings, the County Council would seek the following (for 14,000 units): - Early Years: 26 place nursery to be included in all new 2FE primary schools, as well as premises elsewhere in the new developments to enable early years/pre-school providers to create increased capacity in the sector - Primary: 9 2FE sites of 2.05 ha each - Secondary: 2 secondary school sites (7FE) of 9.7ha each, as well as a satellite grammar site (4-5FE) of 6-7ha. - SEN provision: 1 (2.05ha) site for SEN provision - Waste: Financial contributions towards increasing capacity at Household Waste Recycling Centres serving the district, including those out of district - On-site community facilities: Facilities should be dementia friendly with dementia friendly decoration and signage. A catering area which accords with the Equality Act, including adjustable height work surfaces, wash areas, cupboards etc. Toilets and changing facilities for the severely disabled in accordance with the Changing Places specification set out in Kent County Council's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed which accords with the Equality Act. - Broadband: All Homes to have Fibre to the Premise (FTTP) connections - Youth: Additional IT, Equipment and resources to enable outreach youth services in the vicinity of new developments - Libraries: Financial contributions towards increasing capacity at existing facilities - Community learning: Financial contributions towards increasing capacity via existing facilities and outreach services - Social services: All homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2). Financial contributions towards increasing service capacity in the district. KCC does also require premises that can be leased or let to nursery and early years/pre-school providers who are crucial to supporting parents back into employment. The nursery classes attached to schools do not provide for the younger babies and toddlers that the pre-school providers (mostly private and voluntary sector) cover.
How much do you agree or disagree with the coastal focus option? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree	☒ Neutral The County Council notes that this option would deliver the homes needed to meet Government targets and would involve reallocation of road space. Larger settlements and growth adjacent to existing settlements are preferable from a highways and transportation perspective, as they tend to enable and encourage more sustainable growth, with less reliance on private car use. However, this option would not support the transport improvements within Canterbury or elsewhere, which are considered to be much needed. For the growth option that delivers 9,000 dwellings, the County Council would seek the following: - Early Years: 26 place nursery to be included in all new 2FE primary schools, as well as provision of premises elsewhere in the new developments to enable early years/pre-school providers to create increased capacity in the sector - Primary: 6 (2FE) sites of 2.05ha each - Secondary: 1 secondary school site (8FE) of 11.0ha and one satellite grammar site (4-5FE) of 6-7ha - SEN provision: one (2.05ha) site - Waste: Financial contributions towards increasing capacity at Household Waste Recycling Centres serving the district, including those out of district - On-site community facilities: Design that is Dementia friendly with dementia friendly decoration and signage. A catering area which accord with the Equality Act, including adjustable height work surfaces, wash areas, cupboards etc. Toilets and changing facilities for the severely disabled in accordance with the Changing Places specification set out in Kent County Council's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed which accord with the Equality Act - Broadband: All Homes to have Fibre to the Premise (FTTP) connections - Youth: Financial contribution towards additional IT, equipment and resources to enable outreach youth services in the vicinity of new developments - Libraries: Financial contributions towards increasing capacity at existing facilities - Community learning: Financial contributions towards increasing capacity via existing facilities and outreach services

	- Social services: All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2). Financial contributions towards increasing service capacity in the district. KCC does also require premises that can be leased or let to nursery and early years/pre-school providers who are crucial to supporting parents back into employment. The nursery classes attached to schools do not provide for the younger babies and toddlers that the pre-school providers (mostly private and voluntary sector) cover.
How much do you agree or disagree with the rural focus option? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree	✓ Neutral The County Council notes that this option would deliver the homes needed to meet Government targets and would involve reallocation of road space in sustainable rural areas. The rural option is likely to cause problems from a highways and transportation perspective due to the difficulty in creating sustainable communities, where typically, access to services will require car travel to the nearest centre. In addition, a rural growth strategy tends to lead to more dispersed patterns of growth, which are less likely to provide the critical mass that is required to deliver the necessary infrastructure and services – meaning a rural focussed growth option can be more challenging to deliver sustainably. It is not clear how this option could feasibly and viably provide the necessary school sites. For this option, which proposes a growth strategy of an additional 9,000 dwellings, the County Council would seek the following: - Early Years: 26 place nursery to be included in all new 2FE primary schools - Primary: 6 (2FE) sites of 2.05ha each - Secondary: 1 secondary school site (8FE) of 11.0ha and one satellite grammar site (4-5FE) of 6-7ha. - SEN provision: one (2.05ha) site - Waste: Financial contributions towards increasing capacity at Household Waste Recycling Centres serving the district, including those out of district. - On-site community facilities: Design that is Dementia friendly with dementia friendly decoration and signage. A catering area which accords with the Equality Act, including adjustable height work surfaces, wash areas, cupboards etc. Toilets and changing facilities for the severely disabled in accordance with the Changing Places specification set out in Kent County Council's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed which accords with the Equality Act. - Broadband: All Homes to have Fibre to the Premise (FTTP) connections - Youth: Financial contribution towards additional IT, Equipment and resources to enable outreach youth services in the vicinity of new developments - Libraries: Financial contributions towards increasing capacity at existing facilities - Community learning: Financial contributions towards increasing capacity via existing facilities and outreach services - Social services: All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2). Financial contributions towards increasing service capacity in the district.
How much do you agree or disagree with the new freestanding settlement option? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree	✓ Neutral KCC, in principle, supports growth options that include garden settlements as a model of future delivery, provided that they are suitably located with respect to existing infrastructure and that upgrades to existing infrastructure are properly assessed for their ability to cope with new development. New supporting infrastructure needs to be appropriate in terms of scale. However, from a highways and transportation perspective, it is not clear whether or how a free-standing settlement would deliver the ambitious transportation interventions that are required over this plan period. The County Council would want to work closely with the City Council if this option is progressed, and on any subsequent site selection and assessment.
Are there any other growth options we should consider? ☐ Yes ☐ No	The County Council does not have any other growth options to put forward but would welcome early engagement with the City Council if any alternative options do emerge as a result of this consultation.

2) Town centre strategies

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

3) Housing and new communities

Issue HNC1. 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):

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

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

The County Council supports the preferred option, provided that in consideration of the housing mix targets, assessment also takes into account other infrastructure demands to ensure the developments can be delivered sustainably.

The County Council notes that whilst the Housing Needs Assessment has calculated an overall need of 464 affordable homes per year, the percentage of affordable homes to be required for new development sites is not yet put forward in this Regulation 18 consultation, but instead will be proposed at the next stage of the Local Plan process.

The County Council set up an Affordable Housing Select Committee in 2019 to determine whether KCC can play a greater role in maximising the development of affordable housing in Kent. The Select Committee report sets out a range of recommendations, many of which are for KCC to consider, and which would go some way to support the development of genuinely affordable housing for the people of Kent. Affordable housing will need to be of high quality, in the right location and with the infrastructure to support residents to have a good quality of life, with a range of types and tenures delivered to meet the needs of the community.

When designing sites, care should be taken to ensure that high quality design is accessible, taking into account the varying needs of the evolving community, which includes providing diverse housing types, such as extra care housing, that is flexible and responsive to changing needs. The County Council recommends that this should include consideration of dementia friendly design within the Local Plan. Small design changes to housing and infrastructure can help someone living with dementia to be more independent by providing a home and environment that is clearly defined, easy to navigate, and feels safe.

Given the anticipated impact from COVID-19 of increased home working as a permanent adjustment to people's working lives, the County Council also recommends that consideration should be given as to how to ensure safe and reasonable home working areas. Ensuring that suitable spaces for home working are designed into new development will have positive benefits by boosting the resilience in this area of the local workforce and their ability to continue working and to learn.

Issue HNC2. How should we provide 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):

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

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

The County Council supports the preferred option, and would suggest that on larger sites, which will be delivered by a number of small and medium sized housing developments, there may be a need for master-planning to ensure consistency across the wider development.

It is also worth emphasising that it can be much harder to plan and deliver the necessary infrastructure through piecemeal, smaller sites being built out. The cumulative impacts arising from the build out of lots of smaller sites can sometimes be considerable and this will need to be addressed in the formation of policy.

On large sites with multiple developers (perhaps where land may be in more than one ownership), the County Council would support the use of land equalisation agreements to avoid dispute and delays to the delivery of necessary infrastructure that could affect the delivery of sustainable residential growth.

How should we provide opportunities for suitable brownfield

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

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): If you think there's a better option for brownfield and regeneration land, let us know:	KCC supports the preferred option, subject to viability testing of sites to ensure that they can deliver the necessary infrastructure and community services.
Issue HNC4. 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): If you think there's a better option for housing densities, let us know:	✓ 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 Sustainable Urban Drainage Systems (SuDS): In respect of the Preferred Option, KCC as the Lead Local Flood Authority considers that it is still important that appropriate densities are considered for site allocations, and that the developable boundary and density should also be influenced by possible local constraints, including whether it is a sensitive site, the extents of flood risk and other environmental factors. From a surface water management perspective, greater densities with a small impermeable footprint for the number of units delivered is beneficial. However, greater housing densities should not result in an increase in impermeable areas without proper consideration.
Issue HNC5. 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): If you think there's a better option for rural housing, let us know:	✓ Option HNC5C (preferred option) - support housing developments, at and adjacent to, rural services centres, local centres and villages where this provides affordable housing Access to infrastructure and services can be a real issue for rural communities, particularly where the housing development would generate the need for an increase in capacity of services. Overall, and in principle, the County Council is supportive of this approach, as rural service centres, local centres and villages are more likely to have basic services that other rural settlements would not have. However, the County Council would add the caveat that its support of this option is given provided that the provision of affordable housing does not affect the viability of the sites to provide any necessary infrastructure and that it does not lead to piecemeal development, which can cumulatively put pressures on services without the necessary developer contributions being generated to enable expansion or provision of the necessary infrastructure. It should also be noted that the County Council operates a 'hub and spoke' model for much of its service provision and is not in a position to create additional service centres in areas that do not already have this infrastructure. Heritage and Conservation: It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage, KCC and Kent Downs AONB have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. The Kent Farmsteads Guidance¹ has been endorsed by the County Council and it is recommended that Canterbury City Council considers adopting the guidance, as a Supplementary Planning Document (SPD), as part of the Local Plan process. KCC would be happy to discuss this further.
Community infrastructure and design	
Issue HNC6. How can we support sustainable living in new communities? ☐ Option HNC6A - keep the existing approach to supporting	✓ 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

¹ https://democracy.kent.gov.uk/documents/s40761/B2%20Appendix%20Part_1_Kent_Farmsteads_Guidance_2013_24%205%2013.pdf

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): If you think there's a better option for supporting sustainable living, let us know	There is need to ensure that all growth is delivered with an appropriate range of community facilities, including Early Years provision, Youth Services, Adult Social Care, Community Facilities, Social Services and Waste. The County Council is therefore fully supportive of the preferred option. As a key infrastructure provider, KCC would welcome continued engagement from the early stages of master-planning to ensure that infrastructure requirements are fully integrated within the design of new developments from the outset. The County Council is the Statutory Authority and strategic commissioner of education provision in Kent and sets out its future needs through the Commissioning Plan for Education in Kent². The Commissioning Plan is a dynamic document and is regularly reviewed and provides the background to the responses made here. As set out within the Education Commissioning Plan, assessing the childcare market and ensuring sufficiency and long-term viability of provision for early years is complex and presents a significant challenge for local authorities. The County Council (commissioned through The Education People) is required to work with providers in making available a sufficient range of flexible provision, in the right geographical areas, at the right times and offering the right sessions to fit with both standard and atypical working patterns. The County Council would welcome engagement with the City Council to ensure adequate early years provision is provided to support growth. KCC requires additional education (primary and secondary) places to commensurate with the number of new homes proposed, including a new coastal secondary school and new primary schools delivered within the larger sites. SEN and Early Years provision will also be required – and the full breakdowns have been set out in the sections above in respect of the various growth options put forward. KCC Community services (Libraries, Adult Education, Youth) and Social Services will require financial contributions to mitigate the impacts of the additional housing whether this is via section 106 contributions or the CIL. However, Canterbury CIL is not sufficient to fully meet those impacts. Consequently, it will be extremely important to understand how Canterbury City Council intends to mitigate those impacts not met by CIL. KCC wishes to see that all strategic sites beyond a certain threshold are classified as strategic sites and therefore, included under Section 106 rather than CIL. For social care, all community buildings should be compliant with the Equality Act and all new housing built to at least Part M4(2) standard with a proportion designed to meet the Part M 4 (3) standard. For broadband provision, all new homes, and commercial premises should be equipped with fibre to the premise (FTTP) of 1000mbps. On large sites with multiple developers (such as where land may be in more than one ownership), the County Council would support the use of land equalisation agreements to avoid dispute and delays concerning land allocated for education or other community infrastructure requirements that could affect the delivery of sustainable residential growth. With the use of such agreements, community infrastructure can be apportioned fairly and agreed early on in the process. The County Council will look to support the City Council as part of the Local Plan process to support the work necessary to help Stodmarsh recover in respect of nutrient neutrality and will welcome continued engagement in this matter. PRoW: KCC requests inclusion of developer contributions to go towards improving Active Travel networks. It is important that when development takes place, it does so in a way that will achieve a quality living experience for the benefit of local communities. In pursuing this, the City Council will need to be mindful of the need for the sites allocated for development in the new Local Plan to be viable and therefore deliverable. Public Health: KCC welcomes the NPPF (chapter 8) reference and the focus throughout the consultation around health and wellbeing. There are however a number of areas that could be developed further to improve public health outcomes through the planning system, which would be derived from a clear understanding of the health and demographics of the current population. This should then be used to justify policies and priorities within the Local Plan; for example: • More consideration on smaller level (i.e. middle super output areas (MSOA) and ward data) on health inequalities, so priority geographies for investment and intervention are clear for the council and developers this may be in the form of a background paper such as 'Health and Wellbeing' Topic Paper which provides a useful policy hook for further development of policies down the line and
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² <https://www.kent.gov.uk/education-and-children/schools/education-provision/education-provision-plan>.

	a strong evidence base. Without a policy hook and strong evidence base it can be difficult to implement decisions such as for example restrictions on fast food takeaways (potential development of an SPD likely required). More detailed data can be found at the Kent Public Health Observatory³ or via PHE Fingertips⁴ • Reference the Kent Joint Strategic Needs Assessment⁵ (associated with Kent Health and Wellbeing Strategy) and it may also be beneficial to explicitly key outcomes and priority areas of the Kent Health and Wellbeing Strategy: - Outcome 1 – Every child has the best start in life. - Outcome 2 – Effective prevention of ill health by people taking greater responsibility for their health and wellbeing. - Priority 1 – Tackle key health issues where Kent is performing worse than the England average. - Priority 2 – Tackle health inequalities. • Explicitly state and identify a direct link between the City Council's Corporate Plan and Local Plan and demonstrate how the Local Plan is supported by local evidence. • Wherever possible, new development (and associated funding generated through Section 106 or the CIL) should be designed to support the health of the people with the poorest health. The Regulation 18 consultation clearly identifies the full range of health services and amenities that will be required as a result of the chosen growth strategy and KCC would welcome engagement to ensure the sustainable delivery of healthcare infrastructure. The County Council would also like to take this opportunity to promote the use and incorporation of multi-functional cultural hubs. These provide an excellent mix of services including social care, libraries and education facilities.
Issue HNC7. 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): If you think there's a better option for high quality design, let us know:	✓ 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 KCC notes that Issue HNC7 discusses the application of the new National Design Guide and the National Model Design Guide but makes no mention of the Kent Design Guide. Reference to the Kent Design Guide should be included in the emerging Local Plan. SUDS: Canterbury City Council intends to make sure design is high quality by utilising design codes proactively. Landscaping is referenced, as well as the amount and position of open space provision. Surface water and drainage must be integrated into open spaces and delivered as blue green infrastructure. If the reference to surface water is not considered at the early, plan making stage, it is often only addressed at the later stages of planning which then diminishes what can be delivered. KCC made similar comments on the Model Design Code consultation. Option HNC7C would therefore be supported, as it would be possible to provide greater detail on some elements such as integration of surface water management into open space.
Issue HNC8. How can we deliver low carbon and energy efficient housing? ☐ 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 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:	✓ Option HNC8C - (preferred option) all new homes delivered to net zero KCC fully supports the preferred option. As mentioned under the 'preferred growth strategy option' question above, the delivery of a higher level of growth will need to be carefully assessed against the climate change objectives and to ensure that high levels of growth across the district will still enable the delivery of the area's Net Zero target. Whilst the Local Plan policies seek to mitigate the direct carbon impact of new developments, the secondary impact from consumption, travel and associated infrastructure will generate emissions that cannot easily be offset through the planning process and this will need to be assessed.
How should we do this for refurbishments and changes to	✓ Option HNC8F – (preferred option) set higher local domestic build energy standards for changes to existing homes, and require

³<https://www.kpho.org.uk/>

⁴<https://fingertips.phe.org.uk/profile/local-health/data#page/0>

⁵<https://www.kpho.org.uk/joint-strategic-needs-assessment>

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 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:	planning applications to have an energy plan for improvements to energy performance KCC supports this preferred option.
Issue HNC8. 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: If you think there's a better option, let us know:	✓ 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 KCC supports the preferred option. Reducing water consumption reduces the need to mitigate for nutrients and makes achieving nutrient neutrality easier. Water reuse significantly reduces water consumption. Where this is feasible, typically for large sites and garden settlements, KCC would encourage this approach. Water reuse integrates well with nutrient neutrality measures and makes this simpler to achieve.
Issue HNC8. How will we incorporate renewable energy into new developments? 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: If you think there's a better option, let us know:	✓ Option HNC8K - (preferred option) require all new large or strategic developments to show decentralised energy supply The County Council is fully supportive of the preferred option, which aligns well with the ambitions of the Energy and Low Emissions Strategy. The Local Plan presents a real opportunity to progress future low carbon energy infrastructure such as district heating schemes, hydrogen grids and local energy centres supplied by locally produced renewable energy sources. The preferred approach picks up on comments provided by KCC in its previous regulation 18 response and the County Council fully supports this approach. As site allocations are identified, there will be an opportunity for the Local Plan to further support the zero-carbon agenda by identifying where there is potential for new settlements to become zero-carbon development hubs, for instance, utilising district heating networks or hydrogen energy grids. This could encourage investment in trials and pilots of new zero-carbon technologies and infrastructure. The County Council would be keen to explore these opportunities further with the District Council to support the transition to a zero-carbon economy.
Specialist housing need	
Issue HNC9. How should we provide 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 Adult Social Care: The County Council (as statutory authority for adult social care) has responsibilities to ensure adequate facilities for older persons in the County. This is delivered via the Kent Accommodation Strategy for Adult Social Care. The City Council should have regard to this strategy in determining the housing options for adult social care clients in the district.

☐ 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): If you think there's a better option for housing for older people, let us know:	The Local Plan should reference "Your Life Your Well-Being" - Kent County Council's strategy for Adult Social Care 2018-2021. The strategy seeks to 'help people to improve or maintain their well-being and to live as independently as possible'. Its vision is for people to live independently in their own home receiving the right care and support and the strategy sets out the strategic direction for suitable housing and care home provision for all Adult Social Care client groups. It identifies the need for more extra care/specialist care housing and to explore the opportunities to develop mixed tenure models of extra care/specialist care housing. It is also important to support older persons' care homes in the areas where there is a need for specific support, including for people with dementia that presents as challenging. The County Council is keen to work with the City Council to ensure that there is an adequate, affordable supply of housing options are delivered through the Local Plan. KCC recommends that the Local Plan supports the delivery of specialist care accommodation through developer contributions. The Local Plan should ensure the delivery of specialised homes that support the diverse and evolving range of needs of the local community, including those with learning and physical disabilities and other vulnerable groups. KCC would welcome continued engagement with the City Council in ensuring that the necessary homes to support a sustainable community are delivered.
Issue HNC10. How should we provide accessible and disability-friendly homes? 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): If you think there's a better option for disability friendly homes, let us know:	County Council community service provision: The preferred option is proposing 15% of new properties to be built to M4(2) and around 5% to M4(3). KCC seeks the provision of <u>all new</u> dwellings to be built to Building Reg Part M4(2) standard to ensure that they remain accessible throughout the lifetime of the occupants and meet any changes in the occupant's requirements. Some should also meet the Part M 4 (3) standard. As such, the County Council presents this as a better option.
Issue HNC11. How and where should we provide 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): If you think there's a better option for student housing, let us know:	✓ 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 KCC supports the preferred option to locate purpose-built student accommodation on or near campus as it is a sustainable approach and will reduce the need to travel. This could also help reduce the potential to undermine existing primary schools by limiting the geographic extension of student housing into areas that are predominantly family housing, as has been seen previously in some areas of Canterbury.
Issue HNC12. How should we provide accommodation for gypsies and travellers? ☐ Option HNC12A - keep current approach to meeting gypsy	✓ Option HNC12C (preferred option) - keep current approach and take opportunities through the Local Plan to allocate new pitches where suitable sites are identified The preferred option states that the City Council will 'take opportunities through the Local Plan to allocate new pitches where suitable sites are

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:	<i>identified</i>'. The County Council would advise that this requires more detailed explanation as to how the City Council intends to carry this out and what is meant by an identified site - does this mean a single pitch or several, on an existing or new site? Clarification is requested on this point. There does not appear to be any reference made to ‘transit provision’ or ‘temporary negotiated stopping places within the Local Plan (although the reference within the Sustainability Appraisal at paragraph 3.10.14 is noted). KCC is aware that the district does have unauthorised encampments and so much so, that they most recently had in place a district wide blanket court order ban on certain areas of specified land that unauthorised encampments could not alight upon and set up camp. This area would also benefit from further explanation. KCC would welcome further engagement as this matter progresses.
HNC14 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): If you think there's a better option for strategic infrastructure, let us know:	✓ 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 KCC recognises that there are some large pieces of strategic infrastructure that will be required to accommodate growth in the district, including major improvements to the transport network (as set out in the preferred growth option). The County Council supports, in principle, the approach to provide overarching support for strategic infrastructure projects, subject to the necessary viability testing and environmental impact assessments being carried out to inform the suitability of each project (and presumes this could also be captured in policy criteria). KCC would welcome engagement in this process, to ensure that all impacts associated with KCC services and infrastructure have been fully considered. When considering the viability of schemes, and of the Local Plan as a whole, it will also be important to take into account all the other key pieces of infrastructure that are often necessary to delivering sustainable communities. KCC recognises that this will be a challenge (and notes it is discussed further in the issue HNC17 below). In particular, KCC is keen to continue to work closely with the City Council to develop an enhanced understanding of the infrastructure required to support growth in the Canterbury district - including the mechanisms for delivery, where the gaps in funding exist and how these might be addressed. Where appropriate, the County Council will look to support Canterbury City Council in securing additional sources of funding, when required and will welcome involvement to ensure that all necessary infrastructure can be delivered, whilst ensuring that development remains viable. Subject to the above points, the County Council supports the provision of specific allocations and set criteria within the Local Plan for strategic infrastructure, as this will help to provide a level of certainty and commitment and aligns well with the infrastructure first approach. Additionally, further engagement regarding the role that development contributions (and other funding opportunities) will play in delivering essential infrastructure and enabling development will be welcomed. The County Council has been appreciative of the engagement to date in respect of the Canterbury City Council’s CIL approach to allocating funds and will look forward to continued engagement on this matter, to ensure that the right infrastructure is secured as part of the planned growth. As it stands, section 106 agreements remain KCC’s primary mechanism for funding development-led strategic infrastructure projects across Kent and KCC has been largely successful in delivering major infrastructure projects required to support growth. Therefore, the County Council would generally expect, and strongly request, that section 106 agreements continue to be used for all strategic sites across the district. In the delivery of strategic infrastructure, it is essential to work together, as key stakeholders, to make sure that the full range of necessary infrastructure provided by KCC, as well as the utility and other infrastructure providers, is planned and ready at the right time. This includes ensuring sustainable solutions to the recognised water stress affecting the south east of England, and the need to coordinate growth with the necessary wastewater infrastructure. KCC supports Canterbury City Council in undertaking a Habitats Regulations Assessment (HRA) for the Local Plan to understand the impacts and options for Stodmarsh, as this issue is one of the most serious obstacles to housing delivery in East Kent. KCC would encourage the City Council to develop a nutrient neutral Local Plan and incorporate the necessary infrastructure into the plan to facilitate the delivery of nutrient neutrality at the lowest cost to developers. The County Council would also support the City Council to provide opportunities through the Local Plan to support any work necessary to help Stodmarsh recover and thus end the need for nutrient neutrality in the catchment.

Issue HNC15. 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): If you think there's a better option for renewable energy, let us know:	✓ 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 KCC is fully supportive of the preferred option, which draws on comments provided by KCC at the previous consultation.
Issue HNC16. 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 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): If you think there's a better option for delivering infrastructure at the right time, let us know:	✓ Option HNC16C (preferred option) - set clear requirements for necessary infrastructure to provided at the right time and explore opportunities to deliver critical infrastructure ahead of development The County Council strongly supports the preferred option. The consultation identifies that government is increasingly advocating a move towards infrastructure being delivered up front and KCC welcomes the acknowledgement in the consultation that this is also an approach that is championed by the County Council, in promoting the creation of appropriate infrastructure to be delivered ahead of housing growth, where necessary (Issues HNC16). This approach will be critical in delivering good growth across the plan period. Issue HNC16 identifies the need for new infrastructure to be delivered at the right time, to prevent pressures on existing infrastructure being made worse by new development. The County Council recognises the challenges associated with this – which are often associated with the viability of developments and timing of payment of financial contributions towards infrastructure. The County Council will look to work closely with the City Council and other partners to identify the full range of necessary infrastructure and services that are required for expanding and new communities and, where appropriate, to support the City Council in respect of identification of funding and timing of delivery - as a large proportion of the necessary infrastructure is likely to be provided by the County Council. KCC would also emphasise that ‘necessary’ infrastructure can cover a wide range of infrastructure and service provision and would strongly request involvement in discussions around how to best utilize the key mechanisms for delivering infrastructure up front and how best to ensure the infrastructure first approach can best be achieved. The County Council therefore strongly supports the preferred option – HNC16C, in promoting an ‘infrastructure first’ or infrastructure-led approach to the delivery of critical infrastructure and welcomes the commitment within this option of working with infrastructure providers to explore opportunities and mechanisms to deliver key priority infrastructure. PRoW: In respect of the local economy and employment, allocated land will need to consider Active Travel connectivity to local facilities and public transport and should ensure that development contributions towards high-quality links should be sought. New and improved educational facilities should also reflect a commitment to an Active Travel future and ensure links are provided for all users to schools and universities, providing walking and cycling links through means of an improved PRoW network to public transport.
Issue HNC17. 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):	✓ Option HNC17C (preferred option) - set clear and limited criteria where new viability evidence is accepted at planning application stage The County Council acknowledges that there are some situations that do require a viability review at planning application stage and would emphasise the need for such schemes to still deliver on key infrastructure and services, to ensure that good growth is delivered. However, KCC encourages early partnership working with the City Council on such issues.

If you think there's a better option for development viability changes, let us know	
4) Employment and the local economy	
Issue EMP1 - 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 * If you think there's a better option, let us know:	✓ 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 The County Council supports the preferred option. It will be important to offer a diversified local economy that creates employment opportunities for residents, whether they possess advanced professional skills or a more limited skills set. This diversification will allow growth to be more sustainable and resilient to economic shocks; a varied business community can also result in innovation and collaboration. The COVID 19 pandemic has had a considerable impact on the way communities live and work and the long-term impacts of this pandemic are still evolving. The Local Plan will have to be flexible and resilient to adapt to the changing needs of employers as the full impacts of the COVID-19 pandemic and its impact on the local workforce become apparent – and the County Council therefore supports the City Council's intention to take a flexible approach to employment sites. Whilst the long-term impacts are unclear, there may be a shift in the demand for office spaces, which could potentially be replaced with demand for shared workspaces and meeting spaces for Small to Medium Enterprises (SMEs), with further demands from entrepreneurs and potentially businesses relocating out of London in particular, in response to post-COVID ways of working. Shared workspaces and accessible employment locations have the added benefit of reducing the level of commuting out of the local area. The Local Plan should be adaptable to accommodate these changing trends in work patterns, as the long-term influence of COVID-19 becomes apparent.
Issue EMP2 - Provide the right mix of jobs ☐ 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 * If you think there's a better option, let us know:	✓ 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 The County Council would agree that in planning for growth, there should be a blended approach to ensure the provision of the full range of employment space and services to meet residents' needs. Employment space should be well connected to help existing and new residents access local jobs and there should be a range of employment opportunities available for all skills levels. As such, the County Council supports the preferred option.

Issue EMP3 - Supporting 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 * If you think there's a better option, let us know:	✓ 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 The County Council is supportive of ensuring that strategic development sites contain an element of employment space – to help ensure that local jobs are created for new and existing communities. Therefore, the County Council also welcomes and supports the proactive approach put forward for Canterbury City Council to consider opportunities for enabling development and providing support when employment allocations are not being delivered. The County Council would welcome engagement with the City Council to ensure that the necessary infrastructure is in place to support employment growth across Canterbury.
Issue EMP4: Improving 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 * If you think there's a better option, let us know:	✓ 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 The County Council is supportive of the requirement for new strategic development sites to incorporate commercial development – as providing employment opportunities as part of new developments can help create balanced new communities and support existing ones. The County Council also supports the requirement for accessible employment spaces – with the provision of sustainable transport options and digital connectivity to support a resilient workforce. To further boost the resilience of the workforce, suitable spaces for home working should be designed into new development to allow for safe working spaces to support flexible working patterns.
Issue EMP5: Improving the energy performance and carbon emissions of new commercial developments ☐ 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 If you think there's a better option, let us know:	✓ 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 Within the County Council response to the first Regulation 18 consultation, KCC supported a net-zero approach to development, drawing reference to the Kent and Medway Energy and Low Emissions Strategy, and the need for all sectors to commit to it, to achieve this. The County Council is therefore supportive of this preferred option to ensure that new commercial development and changes of use will contribute to this ambition.
Issue EMP6 - How should we support the development of our	✓ Option EMP6B (preferred option) - Align the Local Plan with the growth plans of the universities

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 If you think there's a better option, let us know:	The County Council is fully supportive of aligning university growth ambitions with the Local Plan growth strategy. It is recognised that focusing growth in Canterbury will help to support the universities, who are significant employers. Supporting the growth of the universities by aligning the Local Plan with their growth plans is likely to enhance Canterbury’s offer and provide a level of certainty in respect of delivery. This is likely to help generate skilled jobs and further stimulate the economy. Limited information is provided in respect of the details of the university growth ambitions and it is anticipated that this will be set out further in the next consultation, to provide the assurances around the timing, funding and viability of expansion and growth, and to ensure that it will align with the Local Plan growth requirements and timeframes.
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 If you think there's a better option, let us know:	✓ 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 The County Council is supportive of the preferred option, particularly as it emphasises the need for increased flexibility to respond to market demand.
Issue EMP8: Supporting growth 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 If you think there's a better option, let us know:	✓ 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 Rural Economy: The County Council, in its response to the Regulation 18 Consultation, promoted flexibility to allow farmers to adapt to ensure a productive and vibrant rural economy and therefore KCC offers support to this preferred option. It should also be noted that KCC would also add that farm machinery is getting bigger and there is a growth in contract farming (which could possibly increase further due to the Agriculture Bill). This machinery is expensive, but larger famers can get back their investment by contracting out the machinery. Very often, this machinery is not designed for the small lanes and rural roads of Kent (mainly because it is machinery designed for more open spaces). This could mean that new field accesses may be needed in the future, which could have implications for busy roads and junctions. The County Council would emphasise the need for digital connectivity to be supported in the rural areas to support both the rural economy, and those working from home.
5) Town centres and local facilities	
Issue TCLF1. How should we designate the hierarchy of centres in the district?	Whilst the County Council does not have any comments in respect of the options put forward for the hierarchy of centres, it would draw attention to the role of community facilities and services within the high street, to ensure these spaces are easily accessible for both new and existing communities.

Option TCLF1A - amend the existing hierarchy of centres ☐ 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: If you think there's a better option, let us know:	
Issue TCLF3. How should we support and protect our local centres? 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	Whilst the County Council considers that the identification of local centres and boundary lines is a matter for the City Council, with input from local residents and other stakeholders, to determine, the County Council would suggest that that achieving the right balance of quality, quantity and distribution of retail is vital in supporting and protecting local centres. To support local centres, the County Council supports a strategy that promotes enhanced accessibility and offers a holistic environment for retail, leisure, social and community uses. Walking, cycling and accessibility to town centres, local centres and rural facilities must be ensured, in order to encourage modal shift away from short car journeys for local needs. Cultural infrastructure is also an essential feature within a town or local centre to create a vibrant mix of uses. It can be delivered as multifunctional spaces that offer opportunities for community services and affordable creative workspaces to support small businesses and freelancers, alongside cultural offerings. The cultural sector also provides local employment opportunities, with the role of higher and further education facilities developing skills in the cultural and creative industries. The Local Plan should therefore consider the delivery of necessary cultural infrastructure to support sustainable development in the District. The County Council encourages the use of art in design to create a sense of place and identity in both new and existing communities.
Issue TCFL4. 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:	✓ Option TCLF4B - (preferred option) designate village centres to protect and improve the existing provision of services and facilities within the rural settlements The County Council would draw attention to the need to ensure accessibility and connectivity both digitally and through sustainable transport options to boost the vitality of the village centres.

6) Movement and transport	
Issue MT1. How can we maximise active travel in the district? ☐ 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 - all new developments must show how they will maximise opportunities for walking and cycling Highways and Transportation: The County Council supports option MT1B. This option is the only option aligned with the NPPF and as such, should be taken forward. It is recommended that emerging policies should also include measures to eliminate “rat running” through residential streets to improve the safety and lifestyle of residents. PRoW: The County Council supports the focus on utilising existing opportunities for walking and cycling and requests the inclusion of PRoW networks to ensure investment opportunities are not missed to provide high-quality connectivity. KCC supports the encouragement of a modal shift away from the short car journeys. The future network will be a result of investment and partnership working to upgrade and improve to higher rights and quality to meet the increased demand from all users of all mobilities. Reference to KCC ROWIP objectives is essential and if not identified in policy, will result in an immediate challenge in implementing central government policy of Active Travel, rural connectivity, health and wellbeing, tourism and home working.
Issue MT2. How do we enable greater use of public transport in the district? 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): If you think there's a better option for road travel, let us know:	✓ Option MT2B - all major developments must show how they will maximise access to the existing local bus network Highways and Transportation: The County Council supports the option MT2B. However, whilst the option is generally supported, it should contain text that aligns and maximises opportunities that may arise from the Bus Back Better initiative. Where possible, larger developments should clearly demonstrate that use of public transport has a greater incentive for the public over that of the private vehicle for the main journey purposes. Targets for distance to bus routes and bus frequencies will also need to be specified within the option.
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): If you think there's a better option for train travel, let us know:	✓ Option MT2D - all major developments must show how they will maximise access to rail services Highways and Transportation: The intentions behind option MT2D are broadly supported, however, at present, no clear targets on accessibility have been set. Local Plan policy will need to clearly identify and cost necessary infrastructure improvements and set achievable but appropriate targets. Accessibility to Canterbury West station from the north of the station should be identified as a priority. Should the preferred option require station or rail frequency improvements, these should be clearly identified.
Issue MT3. 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 Tell us why you chose this option: If you think there's a better option, let us know:	✓ Option MT3B - accelerated transition to zero emissions vehicles Highways and Transportation: KCC is broadly in support of option MT3B, however would also suggest that there are opportunities available to the City Council to include enhanced monitoring of traffic related air quality. Opportunities could be taken to set a standard for monitoring air quality that is above and beyond those required by national standards. This, in turn, could help to secure any additional mitigation required, ensure measures are targeted in the right areas and provide additional transparency on their effectiveness. Details of any proposed Clean Air Zone would need to be provided before the County Council as local highway authority is in a position to offer its support. Any measures with regards to Clean Air Zones should not discriminate against sectors of the population.
Issue MT4. How should we approach parking standards in the	Highways and Transportation: The County Council is in the process of updating its own standards. It would therefore be preferable for a

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: If you think there's a better option, let us know:	position to be reached where the City Council can support the County Council’s new standards.
Issue MT5. 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: If you think there's a better option, let us know:	✓ 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 Highways and Transportation: The County Council supports option MT5C.
7) Historic and natural environment	
Issue NE1. 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:	✓Option NE1B - make changes to the current Local Plan policies Heritage and Conservation: The County Council would prefer option NE1B, as several of the existing historic environment policies set out in the adopted Local Plan could be strengthened or refined – as suggested below (and in the County Council’s response to other related heritage and conservation questions in this response). <i>Policy HE1 Historic Environment and Heritage Assets</i> - The current text includes most of paragraph 133 from the NPPF. However, it excludes a key requirement of the NPPF, which is that (in paragraph 133) it must “be demonstrated” that the substantial harm or loss of a heritage asset is necessary. This requirement is not in the text, meaning that the judgement could be left to planning officers without a requirement for the applicant to provide supporting evidence. It is suggested the text be modified to “<i>Development will not be permitted where it is likely to cause substantial harm to the significance of heritage assets or their setting unless it can be demonstrated that it is necessary to achieve substantial public benefit that would outweigh the harm or loss.</i>” <i>Policy HE6 Conservation Areas</i> - KCC would recommend that “make a positive contribution to” within the current policy, is amended to read “aim to preserve and enhance” the character of a conservation area. <i>Policy HE8 Heritage Assets in Conservation Areas</i> - KCC would welcome the insertion of the text “that outweigh that harm or loss” as this will help ensure a more balanced decision-making process. PRoW: KCC supports the need for “access to nature and the natural environment” and that protection and enhancement of the natural

	environment should include the PRoW network.
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 ☐ 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:	✓Option NE2B (preferred option) - support the adaptation and retrofitting of buildings in conservation areas and historic buildings through new guidance Heritage and Conservation: KCC supports the preferred option. The historic environment has a significant role to play in the conservation of resources required for development and also in energy efficiency. Old buildings can often be more energy efficient than newer ones and of course have the benefit of having already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced guidance (‘Climate Change and the Historic Environment’, 2008) that reviews the threats to the historic environment posed by climate change (more recent guidance can also be found in ‘Climate Change Adaptation Report’ (Historic England, 2016). The guidance demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient than more modern structures and settlements. This has also been updated in the Historic England report ‘There’s no Place Like Old Homes: re-use and Recycle to Reduce Carbon’ (Historic England 2019).
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? ☐ 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: If you think there's a better option, let us know:	✓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 Nutrient neutrality: Achieving nutrient neutrality and supporting the recovery of Stodmarsh National Nature Reserve is essential to supporting the natural environment in Canterbury as one of the most important local habitats. Delivering nutrient neutrality will have benefits for the wider natural environment and will help to achieve net gain. KCC would encourage the City Council to develop a Local Plan that achieves nutrient neutrality. SUDS: The County Council notes that the preferred option NE3C recognises the possible need to enhance blue infrastructure and would like to emphasise that a sustainable drainage approach to the provision of drainage must be promoted where practicable and integrate surface water management with open space delivery. Heritage and Conservation: The current text discusses green infrastructure, but does not mention the role of Canterbury’s heritage in developing green infrastructure. If properly designed, green infrastructure has the potential to help new development be better integrated into the existing rural and urban landscape by ensuring that it fits into the grain of what is already there. The pattern of roads, tracks and lanes in the district has been used for centuries to link Canterbury’s towns, villages, hamlets and countryside. By taking advantage of these existing and historic routeways, people will be able to move through the area while retaining the historic geography of the region, but also following routes more likely to be accompanied by historic hedgerows and planting. This has the potential to unite heritage and ecology to help people access and enjoy green infrastructure features more easily and naturally. Using historic routeways also allows green infrastructure designers to incorporate heritage assets to provide features of interest. In turn, this will help people accessing the green infrastructure to become more aware of and value Canterbury’s heritage, which will in turn assist their conservation and re-use. For example, areas such as the Stour Valley, coastal promenades and the parks and gardens of Canterbury itself could all be linked in the green infrastructure network. This would also support tourism and well-being in the district. To fully appreciate the district’s landscape character and incorporate it into green infrastructure effectively, it is first important to understand it. The main method for investigation historic landscape character is by historic landscape characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. An example of this in Kent is the Hoo Peninsula⁶. Green infrastructure also makes an important contribution to health. Historic England has released research that demonstrates how heritage actively supports health and well-being through contributing to a generally more attractive environment, allowing activities that encourage participation and inclusion and by encouraging outdoors activities.

⁶ <https://historicengland.org.uk/research/current/discover-and-understand/rural-heritage/hoo-peninsula/>.

	Biodiversity: The County Council agrees with the preferred option NE3C and is supportive of the commitment to require new developments to provide a 20% biodiversity net gain. It will be important, where possible, to secure the long-term management of sites, areas and features important for biodiversity and geodiversity. KCC would highlight that as part of biodiversity net gain, there is a need for a Local Nature Recovery Network to be produced, which is something that will need to be produced with a county-wide approach. Any green infrastructure should be linking into the Local Nature Recovery Network⁷. It is requested that reference is made to protected/notable species – there is a need to ensure that it is understood what species are present within a site or area to help inform green/blue infrastructure plans/ the Local Nature Recovery Network and retain connectivity. There is also a need to ensure that consideration is given to the use of open spaces, PRow and associated uses in relation to impacts on protected/notable species and habitats and any design of the creation/enhancements of these areas must take it in to account to retain the interest. The County Council recommends reference to Kent's Plan Bee, a pollinator action plan developed by the County Council that seeks to improve the food sources and general habitat for pollinators.
Issue NE4. How should we make sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscapes?	Heritage and Conservation: It is important that local landscape designations incorporate an assessment of the historic aspect of the landscape in their designation decision-making. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. The Kent Historic Landscape Characterisation (HLC) Survey (2001) is an important resource for understanding the landscape of Kent and its development through time. It must be emphasized, however, that the HLC is a strategic, not local, assessment. It allows us to look at the landscape of Kent and draw conclusions about the development of the landscape in different parts of the county and the county as a whole. It is not detailed enough to use at a large scale. What is needed is a more detailed assessment of the landscape of Canterbury (as, for example, has already been carried out for Tunbridge Wells Borough and the Hoo Peninsula). KCC would be happy to discuss this further with the City Council.
Issue NE6. 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:	✓Option NE6B (preferred option) - include clear requirements for development proposals to conserve or enhance the tranquility provided by dark skies KCC would advise that the Local Plan considers the impacts of lighting across the district on both species/habitats and people, as artificial lighting can have a negative impact. The County Council therefore supports option NE6B as a preferred option.
Issue NE7. 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): If you think there's a better option for protecting open space, let us know:	✓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 The County Council would recommend that all allocated sites are selected with consideration and attention given to the need for preserving open spaces, benefitting both the environment and providing health and recreation benefits for communities. Heritage and Conservation: The district has an outstanding collection of parks, gardens and green spaces, within Canterbury itself and across the district. It is important to assess the historic context of these in order to understand the role that they play in the landscape and could play in green infrastructure networks. KCC has for the past few years worked closely with volunteers from the Kent Gardens Trust to review sites in the Kent Gardens Compendium and elsewhere and bring the reports up to a standard appropriate for use for planning purposes and potentially for inclusion in a Local List. It is strongly recommended that Canterbury City Council considers implementing a similar project.
Issue NE8. How can we support accessible outdoor sports and recreation across the district? ☐ Option NE8A - keep the current approach	✓Option NE8B (preferred option) - consider prioritising sport facilities where there is an identified lack of them Sports and Recreation: KCC welcomes the development of the Playing Pitch Strategy and the role it is having in this emerging Local Plan.

⁷ <https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network>

☐ 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:	The County Council would welcome further engagement as the Local Plan progresses to assess how KCC can further support the City Council to increase sport and physical activity provision and participation in the district.
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 ☐ 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): If you think there's a better option for approaching local green spaces, let us know:	✓Option NE9B (preferred option) - keep the local green spaces identified in the current Local Plan The County Council supports the preferred option to keep local green spaces that are already identified in the adopted Local Plan. It will be critical to ensure that allocated sites across the district are also designed with an adequate supply of open space. Studies show the significant contribution that green spaces can provide in respect of health and well-being benefits for the public, but such spaces face increasing pressure from new development and population growth. Master-planning will need to ensure that necessary steps are put in place to protect, and provide sustainable access to, existing green spaces, and to also to ensure that new green spaces are an integral part of new development.
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 ☐ 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): If you think there's a better option for SuDS, let us know:	✓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 SUDS: With respect to Option NE11B (the preferred option), KCC would emphasize that the NPPF requires sustainable drainage systems to be provided that are multi-functional. The recent review of the Non-Statutory Technical Standards by Defra has expanded the requirements of review of drainage systems to include water quality, amenity and biodiversity. Defra is yet to provide any specific directive in relation to the outcome of the review, but it is a strong indicator that the multi-functionality of sustainable drainage systems will be sought to be delivered.
Sustainability Appraisal	
Key Objectives & Policies – Transport	PRoW: It is requested that specific mention is made of the PRoW network improvements and investment – references to “walking and cycling” should include the PRoW network and therefore equestrians as well. Paragraph 3.12.24 – the County Council welcomes the inclusion of KCC PRoW ROWIP and requests inclusion that all development must ensure they take the ROWIP into account in order to incorporate PRoW positively and ensure Active Travel connectivity across the whole district. The “Key sustainability Issues” are supported.
4 – Sustainability Appraisal Approach	PRoW: Paragraph 5-5.2 – “support improvements to existing non-designated landscapes” – should include reference to the PRoW network, as historical routes form part of the landscape of the district. Paragraph 13-13.4 - “investment to improve transport infrastructure” should include Active Travel and PRoW links. Paragraph 14 – this is supported and KCC requests that the PRoW network should be included as part of the aim to protect the landscape, visual impact, air quality, which is a significant part of user enjoyment with significant health benefits and the wider natural environment. The network provides substantial opportunities for active travel and outdoor recreation, which can help to address issues associated with health, wellbeing and air quality.

5 – Draft District Vision	PRoW: Paragraph 5.3.2-3 KCC supports the aim to switch to Active Travel and the significant increase in opportunities for walking, cycling sustainable transport. Paragraph 5.4.1 – Preferred Option 2, in stating “additional investment in local transport network” it should include specific mention of Active Travel / PRoW network. Paragraph 5.5 Non-Strategic Options – KCC supports HNC16C and refers to it’s comments above in respect of this issue. <i>Movement and Transportation</i> Issue MT1 – KCC supports the option MT1B and suggests amending the text to include “investment in existing walking and cycling networks” as well as aim to provide for new. Issue MT2 – KCC supports MT2B preferred option – access to bus network must be accessible to all and on foot and cycle. Issue MT5 – KCC supports MT5C. A transport assessment and travel plans provided by all developments should include Active Travel opportunities and advice working with KCC PRoW and Access Service for current and correct information. Mitigation 13 – “promote and encourage sustainable transport” should include text to incorporate existing networks. 14 – KCC requests inclusion of reference to KCC Countryside Access Team working in partnership.
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