



Fwd: Canterbury District Council : Local Plan Consultation (CDLPC) 2040

1 message

CCC Planning <planning@canterbury.gov.uk>

9 August 2021 at 07:59

To: 


Regards,

Planning Team
Canterbury City Council
01227 862178



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From: **C Brown** 
Date: Sun, 8 Aug 2021 at 21:15
Subject: Canterbury District Council : Local Plan Consultation (CDLPC) 2040
To: CCC Planning <planning@canterbury.gov.uk>

PART 2 of 2



Dear Canterbury City Council

My further comments and observations on the CDLPC 2040 are given below:

“Town centre strategies”

General Comments

1. I have assumed that the visions and objectives set out for Canterbury, Herne Bay and Whitstable relate to the preferred Growth option described on page 8 of the CDLPC where major growth has been focussed on Canterbury.

2. With respect to the particular visions and objectives described for Canterbury, Herne Bay and Whitstable, it is suggested that for improved clarity, the CDLPC could have grouped together those visions and objectives that are common to all three communities. In contrast those features that distinguish the three communities from each other would be separately presented. For example, digital infrastructure, walking and cycling, encouraging tourists, making use of space above shops for residential purposes etc are common to all three communities whereas heritage and university education are particular to Canterbury, as is the port and high street

particular to Whitstable and the promenade and pier to Herne Bay. This is an interesting combination of communities, which are in close proximity and not found elsewhere in Kent or possibly elsewhere in England and needs to be promoted.

Specific Comments

3. In connection with the coastal resorts of Herne Bay and Whitstable, it is suggested that reference is made to the Chief Medical Officer's most recent annual report for 2021, "Health in Coastal Communities" published 21 July 2021. I appreciate that this report post dates the preparation of the CDLPC, but suggest that it is worthy of consideration to check if there are any useful messages for the communities in Herne Bay and Whitstable.

4. The objectives of all three communities include "increasing residential occupancy by converting space above shops" and several recent store closures in Canterbury High Street come to mind. I do not have any queries with this policy in principle but caution that because such conversions have permitted development rights they are not subject to the scrutiny, checks and requirements that are necessary if planning permission was required which can result in sub-standard construction in some cases. The LGA paper "Offices left empty by Covid-19 could result in surge in substandard home conversions" 17 May 2021, provides further background on this issue.

5. None of the three community's visions or objectives refer specifically to the upgrading of existing housing stock or the provision of new homes to meet the zero carbon emissions target by 2050. I appreciate that this is beyond the CDLPC's time horizon of 2040, but suggest that given the long lead times involved in arranging, for example, the installation of low carbon heat generation to homes on a District wide basis, we will need to be well advanced by 2040 in order to meet the net zero target.

Community infrastructure and design

Option HNC8C (preferred option)

6. Agree in principle with this option but query how the proposal for failing developments to contribute towards a district decarbonisation fund would be set up and operated in practice?

Option HNC8E

7. This option is preferred over **Option HNC8F-(preferred option)** since the latter could result in the cost of lowering the operational emissions of the whole property exceeding that of a proposed extension: a major disincentive for any minor home improvements.

Option HNC8I – (preferred option)

8. Agree in principle with this option but suggest that to improve overall water efficiency, water meters are installed on all existing properties where they are not already in place. In addition, suggest that in order to reduce domestic water use, consideration should be given to the collection and storage of rainwater and "grey water" to replace using potable sources where it is appropriate and safe to do so.

Option HNC15A

9. This option is preferred over **Option HNC15B – (preferred option)** since the latter could lead to uncontrolled multiple developments in unsuitable locations, adversely affecting local environments and amenities. However, in terms of food security, the use of arable land for solar panel arrays is not supported given the large potential for domestic and commercial rooftop installations plus further off-shore wind farms eg Kentish Flats.

Option HNC16C – (preferred option)

10. Agree in principle with this option but additionally suggest that consideration could be given to the use of “negative” (Grampian) planning conditions where a specific phasing or certain works are required to be completed and operational in advance in order to serve development.

Movement and transport

Option MT1B – (preferred option)

11. Agree in principle but suggest need to consider linking any development related footpaths and cycleways to the National Cycle Route network within the Canterbury District such as Routes 1 and 15.

Heritage and the historic environment

Green Gap between Herne Bay and Whitstable

Option NE5A

12. This option is preferred over **Option NE5B – (preferred option)** since there does not seem to be any compelling need to change the approach used in the Adopted Local Plan 2017 policies OS6 and OS7.

Water environment and how it connects with our communities

Option NE10A

13. This option is preferred over **Option NE10B – (preferred option)** over the latter since it is not clear how any development would avoid compromising the existing vital coastal defences. Given the uncertainty of future rises in sea level, potential North sea surges and the increased incidence of higher rainfall due to the warmer climate among other issues, it is would seem that such development would, at the very least, be highly vulnerable to storm damage.

Statements of Common Ground (SoCG)

14. SoCGs have been agreed with Ashford BC and Dover DC and I assume that those with Folkestone & Hythe DC, Swale BC and Thanet DC are in progress.

Regards

C S Brown