

# Canterbury District Local Plan Preferred Option Consultation Draft, June 2013

Response from CPRE Protect Kent



August 2013



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## Introduction

CPRE Protect Kent is the Kent Branch of the Campaign to Protect Rural England which is part of the national CPRE charity. It is our objective to retain and promote a beautiful and thriving countryside that is valued by everyone and we believe the planning system should protect and enhance the countryside in the public interest for the important contribution it makes to peoples' physical and mental wellbeing, as well as its vital role in feeding the nation. It is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

In the following pages we present our comments on the Canterbury District Local Plan Preferred Option Consultation Draft (hereafter referred to as the consultation draft). The comments have been prepared jointly by the CPRE Protect Kent County Branch Office and the CPRE Protect Kent Canterbury District Committee. Our comments are presented in two parts, as follows:

- Part 1: The Plan Strategy
- Part 2: Other Comments

## Part 1: The Plan Strategy

This part of our response focuses on Chapter 1 of the consultation draft, but it will also draw on parts of Chapters 2, 3, 4 and 5 as appropriate. It will also refer to other supporting documents made available by the City Council. Although this part of our response will be wide-ranging, we consider that it is important that in assessing and addressing our concerns our response is considered in the round. We are aware that the City Council would prefer to have comments made against specific paragraphs and policies presented in the consultation draft, but we consider that this stifles the opportunity to make an argued and coherent response. We, therefore, request that Council Officers refrain from dissecting this part of our response by 'cutting and pasting' particular parts of it to the online consultation system. This part of our response needs to be considered in its entirety and made available to Councillors in this form.

We have fundamental concerns with the plan strategy – i.e. the amount of development proposed; the spatial strategy presented; and particular sites allocated for development. We also have concerns with the transport strategy and the heavy reliance on the provision of new road infrastructure which seems to be at its heart. In our analysis this has been the determining factor shaping the plan strategy, not the need to ensure that development is provided in sustainable locations to meet the needs for development from communities throughout the district. In particular the needs of the many rural communities in the district have been almost entirely ignored.

Our conclusion is that the strategy as currently presented does not comprise sustainable development as required by the National Planning Policy Framework (NPPF) and, because of its reliance on the development of large greenfield sites to fund major new infrastructure, it is not realistic and deliverable as required by the NPPF. Consequently, we do not believe that it is a sound strategy and the Plan should not be progressed on this basis.

a) The amount of new development

Policy SP2 of the consultation draft promotes a level of development in accordance with scenario E as presented by Nathaniel Lichfield & Partners (NLP) in their '*Canterbury Development Requirements Study*', January 2012. This would see the construction of 780 dwellings a year (15,600 in total) and the provision of 328 new jobs a year from employment land (6,500 jobs in total) for the period 2011-31. This scenario falls at the top end of the 'upper mid-range' of scenarios defined by NLP and, in their assessment, would require a land take of between 400 and 500 ha. It is considered by NLP that it is a scenario that would support the more ambitious economic vision that the Council has identified in the Futures Study, and that it would require an increased rate of development than achieved in the past.

The Futures Study was prepared by Experian in 2006, but was reviewed in 2011 to assess the changes to the economic and policy climate that had occurred since 2006. It is difficult, though, to relate the conclusions of the Futures Study to any of the scenarios presented in the NLP study, and why scenario E specifically equates with the Futures Study as being the 'preferred scenario', or indeed why the Futures Study *per se* is equated with an ambitious economic vision as stated in the consultation draft. The Futures Study makes no firm recommendations or proposals as to the level of future housing and employment development, but rather gives views on a number of 'potential outcomes'. As explained in the original 2006 report, the aim of the Futures Study is to "*identify possible outcomes for the future of Canterbury over the next 20 years, by assessing global, national and local trends and influences.*" It is essentially a review of background information and conditions, and how these might impact on the five specific outcomes assessed. It is the City Council that has determined that the findings of the Futures Study comprise the 'preferred' Scenario E presented and favoured in the NLP report. Thus it is not surprising that Scenario E comprises the strategy proposed for the Local Plan, as it has been pre-determined and retrospectively justified.

Also in support of the 'preferred' Scenario E the City Council points to the findings of the Ipsos MORI public opinion report. This, though, canvassed the views of just 900 people out of a district population of around 150,000 – just 0.6% of the population. The consultation draft (paragraph 1.18) claims that this work demonstrates a "*...significant level of public support for the scale of development set out in this draft Local Plan*". We would question the validity of this claim given the very small number of people actually canvassed. Furthermore, it is also the case that whilst the results show that the majority of those canvassed support new house building in principle (as indeed would CPRE if asked the question), just 26% support house building at a rate above that achieved in the past (stated as 556 homes per year since 1990). The survey also highlights that 70% oppose development if it means greenfield development, even if they support development in principle. It seems to us that the Council has sought to be very selective in those parts of the Ipsos MORI report it uses in order to help justify its selection of Scenario E, and it certainly is not the case that there is a significant level of public support for it.

Paragraph 1.15 of the consultation draft reports that the Sustainability Appraisal (SA) of the scenarios carried out by AMEC concluded that Scenario E offers the greatest potential to achieve the appropriate balance (i.e. to optimise growth and minimise detrimental environmental effects). We would strongly dispute this conclusion, which we find inconsistent with the detailed SA undertaken.

The SA was undertaken on the assumption that Scenario E would require 446 ha of land for residential development and 16.5 ha of land for office development. This falls in the 400–500 ha land take range assumed in the NLP Study. Although the SA concludes (paragraph 3.2.5) that Scenario E has the *'potential to score significantly negative for objectives related to countryside and historic environment'* because of the significant areas of greenfield land needed, this is not what is recorded in the detailed assessment of the scenario under SA Objective 5. Here the scoring suggests that the impact might be just minor negative. We fail to see how the loss of 400–500 ha of greenfield land can be anything but 'major negative' especially as it will inevitably include the loss of high grade agricultural land, and this should be the finding of the SA. Simply by seeking to avoid sensitive areas, as stressed in the SA, does not minimise the environmental impact under the scope of Objective 5 (and other objectives, e.g. Objective 14), even if this is what the strategy does – which we would dispute anyway.

However, for scenarios F, I and J the impact under SA Objective 5 (and other Objectives, e.g. Objective 14) is concluded as being major negative, and these scenarios are rejected largely because of this (see the final paragraph on page vii of the AMEC SA report). For these scenarios the land take (for housing and employment) is assumed to be 678 ha, 681 ha and 710 ha respectively, because they promote an even higher level of development than Scenario E.

The consultation draft does not give any site areas for the proposed development sites, but from the Strategic Housing Land Availability Assessment (SHLAA) the extent of just the proposed strategic site allocations is 632 ha, well above that assumed in the SA as necessary to accommodate all the development proposed under Scenario E. This, therefore, makes Scenario E comparable in terms of land take with that assumed in the SA for scenarios F, I and probably also J as currently assessed (though in reality these would probably also need more land than that assumed in the SA). This must mean that the assessment in the SA under Objective 5 should actually be 'major negative' impact. Given that it is now known what the actual land take will be in accommodating growth under Scenario E, the SA of the scenarios needs to be reviewed. We have no doubt that this would show that as for scenarios F, I and J in the current SA, Scenario E will be shown to have unacceptable environmental impacts and should be similarly rejected. The SA is meaningless if the assumptions that underpin it are wrong.

There are other concerns we have with the SA, in particular consistency in how the various scenarios are considered. For example, the summary conclusion for Scenario B (paragraph 3.2.2) is much more negatively written in terms of environmental impacts than that for Scenario E, even though it involves a lower level of development. For Scenario B very specific and detailed concerns are highlighted, such as the negative effects of dust, noise and vibration during the construction period, which are not mentioned in the summary for Scenario E. Even in regard to the comments on commuting, for Scenario B it was felt necessary by AMEC to highlight potential concerns about increases in carbon emissions and a reduction in air quality, whilst for Scenario E these points are not so highlighted. We believe that the SA of the scenarios has put a positive 'spin' on the preferred scenario, and that other scenarios involving lower levels of development have been more stringently assessed so that they are seen to be no better in terms of their environmental impact. This increases our concern that the evidence base has in fact been used to justify a pre-determined 'preferred' development scenario, rather than helping to make an objective decision from the choices.

Another serious concern we have with Scenario E, and indeed development generally in Canterbury District, is the impact on water supply. At Annex A we attach advice that we have secured on this matter. In short, Canterbury falls in an area which the Environment Agency has defined as seriously stressed, and in a supply area which South East Water forecasts in its new draft Water Resources Management Plan will become increasingly in deficit over the next 25 years. Whilst by 2034/35 supply might increase as a result of bulk transfers, the area will still be in deficit and the water company has no proposals scheduled in Canterbury to increase supply before 2030 (i.e. Broad Oak reservoir). Consequently, in our view, South East Water will be unable to guarantee the minimum level of deployable drought output required to ensure security of supply. We believe, therefore, that it is a responsibility of the local planning authorities in the Eastern supply area to moderate development aspirations in recognition of this serious constraint. We believe that Canterbury City Council has not given due regard to this issue in pursuing Scenario E which, for example, is only seen as having a minor negative impact on water supply in the Sustainability Appraisal of the development scenarios. There will clearly be a major negative impact on water supply if this level of development is pursued.

In the light of our comments above, CPRE Protect Kent **objects** most strongly to Scenario E as forming the basis of the strategy of the Plan. We seriously question the way that it has been justified and assessed. We believe that such a high level of development is overly aspirational and unrealistic. We consider that the environmental impacts, as illustrated by the large areas of greenfield land proposed for allocation, have not been consistently and fairly assessed in comparison with other scenarios. We consider that the justification given to it by the NPL Study and the Futures Study is dubious, and that its sustainability credentials are grossly overstated. It will also impact further on water supply in an area already defined as 'seriously stressed'. It is also not a level of development that has significant public support, as claimed is demonstrated by the Ipsos MORI opinion survey, and we are sure it will attract significant objection in responses to the consultation draft. These concerns must be taken note of, and the strategy changed.

An additional 15,600 dwellings will comprise a 25% increase in the number of households in the district, and at 780 new dwellings per year the Plan strategy will demand a sustained level of house building in Canterbury District that has never before been achieved. Over the 20 year period from 1992/93 to 2011/12, which was mainly one of economic growth, the annual average rate of housing completions was 543<sup>1</sup>. A level of house building at or above 780 dwellings per year was only achieved in two years during that period – in 2007/08 and 2008/09. A target of 780 dwellings per year would demand a 44% increase in the annual rate of delivery compared to that achieved over the last 20 years. In effect the Council has already failed to meet the first year of the target (2011/12) when 624 dwellings were completed<sup>2</sup> meaning that the annual rate will already have to increase for the remainder of the Plan period, and it is likely to increase further by the time the Plan is adopted and sites can start to come forward. We, therefore, believe that a target of 780 dwellings is unachievable, especially in the short-term when there is no clear end to the recession and people continue to find it difficult to secure mortgages as a result of cautious lending and job insecurity. Consequently, the proposed level of development does not accord with paragraph 154 of the NPPF, which demands that plans are realistic.

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<sup>1</sup> Canterbury District Housing Information Audit, 2011/2012 edition, produced by KCC

<sup>2</sup> As above

Promoting such a high level of development runs the risk of further land having to be permitted for development that is not promoted for development in the Plan if the Council fails to maintain a five year supply of deliverable sites in accordance with its eventual housing target. This is a requirement of paragraph 47 of the NPPF. In this regard we would highlight the experience of Dover District, where in its Core Strategy the District Council set a high housing target in order to boost economic growth in much the same way as the City Council is proposing (e.g. as explained in paragraph 1.14 of the consultation draft). However, despite persuading the Examination Inspector that the target was deliverable, this has proved not to be the case and the District Council cannot now demonstrate a deliverable five year housing land supply in accordance with the NPPF. Consequently, the District Council has recently granted planning permission for 521 dwellings in the Kent Downs Area of Outstanding Natural Beauty for a site that forms no part of its planned strategy. Dover can, perhaps, be forgiven for not being aware of this consequence of an overly ambitious housing target, as the Core Strategy was adopted before the NPPF was formulated. However, for Canterbury City Council to go down the same path, in full knowledge that this could be the consequence of failure to deliver an overly ambitious housing target, would be reckless and irresponsible. We believe that preparing the Plan on the basis of Scenario E seriously runs this risk, and will mean that the Council's ambitions to boost economic growth will potentially be stifled by unplanned development.

Another serious concern we have with the delivery of the proposed strategy is its dependency on the provision of significant new road infrastructure. We comment further on transport strategy matters in the next section of this response, but several of the proposed strategic allocations demand new and expensive road infrastructure. From independent professional advice we have commissioned, we estimate that the proposed road infrastructure for the strategic sites alone will probably cost in the order of £100m (see Annex B). We fail to see how even the proposed 15,600 dwellings will fund this scale of infrastructure, and it is extremely unlikely in the current economic situation that other funding will be available for the schemes proposed. We note that reference is made in paragraph 1.31 of the consultation draft to the South East Local Enterprise Partnership (SELEP) and funding being made for schemes under the Growing Places Fund. However, we are unaware that any of this funding is being made available for the road infrastructure being promoted in the consultation draft. If this is the case, it should be stated in the Plan.

The absence of an infrastructure delivery plan in the consultation draft suggests to us that the City Council itself is struggling to resolve this fundamental component of the plan, and it is extremely unfortunate that this is not available for comment at this time. The consequence of linking development to the provision of extensive new infrastructure is that the strategic sites will be complex to deliver, which will inevitably mean that some considerable time will be needed to make sure the necessary up-front planning, funding and legal agreements are in place before there is any prospect of development on the ground. Furthermore, we have been advised by officers from the City Council and the County Council, that the strategic development sites (other than south Canterbury) will be phased so that the Sturry link road will be provided as the top priority meaning that development may actually be held back until this key piece of infrastructure is put in place. Consequently, given that the achievement of the housing target is so reliant on a handful of large strategic sites, but that progress with these sites is reliant on the delivery of new road infrastructure, there is a distinct lack of certainty that over the timely delivery of new housing and the maintenance of a deliverable five-year land supply. This will be particularly so in the short to medium-term. Again, we would suggest that this demonstrates that the proposals are over ambitious and unrealistic.

The whole issue of deliverability and realism is underlined by the fact that even the NLP study does not consider that Scenario E is realistically deliverable. In Table 7.4 of the NLP report, in response to the question “*can the development requirements be realistically delivered given market capacity and demand?*” Scenario E is shown with an amber coloured circle. This colour coding is defined as representing “*a level of housing which goes part way to meeting the Corporate Plan pledge or policy objective/aspiration*”. So, even NLP consider that the levels of development under Scenario E are not entirely deliverable in terms of market capacity and demand.

We note the Council’s desire to promote economic growth, to meet housing need and even to provide some essential new infrastructure that will be of benefit to the wider community. However, we do not believe that Scenario E is the right basis for doing this, and we consider that the scale of development it represents is too ambitious, too damaging and too risky. In the terms of paragraph 154 of the NPPF it is over ambitious and is unrealistic. We consider that a more realistic, and thus deliverable, strategy should be pursued.

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With all these points in mind, we consider that a strategy for the Plan that sees development in the ‘lower mid-range’ as defined in the NLP report would be the most realistic and deliverable strategy. This would see housing development in the range of 500-650 dwellings per year. We consider that a target of around 600 dwellings per year (around 12,000 in total), roughly equating to Scenario B, should be pursued. This is a level of development that will see growth in housing provision above that achieved over the last 20 years, but recognises that the recession will continue to depress provision for the foreseeable future. It is also a level of development that will deliver economic growth, as confirmed by the NLP report. Importantly, this lower level of new housing and employment provision will be balanced by less environmental impact, meaning overall that this would better accord with the principles of sustainable development – i.e. the integration of economic, social and environmental considerations, as required by paragraphs 6 to 9 of the NPPF.

The NLP report comments that this level of development (i.e. Scenario B) is ‘*eminently deliverable*’, which we take to mean that it is realistic and achievable in the terms of the NPPF. However, we would not suggest that this means it is an easy option as it is a level of development that will present delivery challenges, and there will be issues that will have to be overcome. It is, after all, still a high level of development when compared to that achieved in Canterbury in the past. For example, there will be transport and access issues that will need to be resolved as there are for the Council’s own preferred option. Other issues, such as impact on air quality, will also need to be addressed and new and improved social and community facilities will be needed to ensure that development contributes to making sustainable communities. It will also be necessary to ensure that development is located where it minimises land take and that developments make the most efficient use of land. We believe that a target of around 600 dwellings per year will not need to rely on very large greenfield land releases, as is the case with the Council’s preferred option, and thus our valuable countryside and agricultural land can be protected.

NPL raise some concern that Scenario B will result in unmet housing need, and that it would be necessary for neighbouring authorities to accommodate what they call ‘*Canterbury’s overspill*’. We do not accept this point, as to meet all unmet housing need is not possible – even Scenario E does not do this, but the ‘overspill’ point is not raised by NPL in regard to that scenario. To

meet all the identified need would mean that Scenario J would have to be adopted with a target of 1,149 dwellings a year to be provided. Even the Council has rejected this scenario as unacceptable in terms of delivery and environmental impact. More importantly, it is Scenario H at 80 dwellings a year, which meets the needs of the local population through natural increase, so adopting a target of 600 dwellings per year, as we suggest, comfortably does this and goes a long way to ensuring that 'backlog' is addressed. Given the risky nature of Scenario E, it is quite likely that Scenario B will actually be more successful in achieving this. It is also the case that neighbouring local authorities are planning for a level of housing development that is based on the assumption of significant in-migration. This is particularly the case at Dover and Ashford, and to a lesser degree at Shepway and Swale (contrary to the view expressed by NLP in the non-technical summary of their report). Therefore, by good fortune rather than any co-ordination through the 'duty to cooperate' it is likely that neighbouring authorities will absorb some of the housing needs from people currently living in Canterbury District, and thus help to meet some of Canterbury's unmet need as the NPL report suggests.

In conclusion, we believe that contrary to the conclusions of the SA a strategy that roughly accords with Scenario B offers the greatest potential to achieve the appropriate balance between growth and environmental impact, not Scenario E. Above all it will be deliverable, though not without challenges.

#### b) The Spatial Strategy

Paragraphs 1.67 to 1.72 and Policy SP4 of the consultation draft set out the '*strategic approach to the location of development*'. It is explained that the strategy comprises a sequential approach to the allocation of land for development, meaning that the urban areas of Canterbury, Herne Bay and Whitstable will continue to be the focus for development, with a particular focus at Canterbury, together with development at some of the rural service centres.

A rural settlement hierarchy is set which defines a rural service centre (Sturry) and a number of local centres, villages and hamlets. Reflecting the hierarchy, Policy SP4 proposes that in addition to the allocations proposed in the consultation draft:

- small-scale provision will be supported at the service centres;
- minor development and infill and housing to meet local needs will be acceptable at the villages;
- at the hamlets development will be limited to that needed to meet identified local needs; and
- in the open countryside development will normally be limited to that required for agriculture and forestry.

The consultation draft considers that this approach to development is supported by a wide-range of background studies and that it meets the objectives of other strategies. In particular, paragraph 1.12 states that "*Some of the key actions in the Corporate Plan relate directly to the strategic direction of this Local Plan*", and lists what are considered to be the appropriate key actions that the Plan secures.

CPRE Protect Kent **supports in principle** a sequential approach to development as advocated in Policy SP4 of the consultation draft, where the focus of development is at the urban areas. We consider that this sequential approach is equally applicable in distributing the lower

development targets that we promote in section a) of this response. However, we **object** to how this sequential approach is being applied in the consultation draft, for the following reasons:

- i. *Reliance on large greenfield allocations*: The Strategic Site Allocations made under Policies SP3a-h lie at the heart of the spatial strategy. These eight sites alone, comprising 632 ha of greenfield land, account for 9,000 of the total 15,600 dwellings proposed under Policy SP2, as well as much of the proposed new employment floorspace. We comment on the individual sites proposed in section c) of this response below, but we object to a spatial strategy and application of the sequential approach that results in the allocation of a few large greenfield sites to accommodate the vast majority of the new development proposed. In particular we object to the sites at South Canterbury, Sturry/Broad Oak, Hillborough and Strode Farm which together account for nearly 70% of the dwellings proposed on new allocations.

The consultation draft provides no explanation as to why the spatial strategy must take this form, why the specific sites have been selected, and why any alternative sites are inappropriate. In our analysis of the background studies and assessments, it seems that the proposed sites are all predicated on the assumption that the spatial strategy presented in the Plan is the only way that the development quantities in Scenario E can be delivered, but there is no clear explanation as to why this is the only feasible approach. There is only one paragraph of text that introduces the site policies, which offers no explanation.

This proposed strategy fails to make the best use of previously developed land, which is one of the key actions in the Council's Corporate Plan as highlighted in paragraph 1.12 of the consultation draft. This is not just because the sites proposed are greenfield and that brownfield opportunities have been rejected, but also because they will become the focus of the Council's resources to secure delivery in order to ensure that there is any chance of delivering the development targets and associated infrastructure provision. We believe that such focussing of resources will inevitably be at the expense of efforts to bring forward any brownfield sites that are identified for development. Consequently the Plan is contrary to the NPPF which, as a 'Core Planning Principle', seeks to encourage the effective use of land by reusing land that has been previously developed. The Plan blatantly fails to do this by relying on a handful of large greenfield sites, and as such does not properly apply the sequential approach advocated in the consultation draft to site selection.

It is also a requirement of the NPPF (paragraph 112) that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. In so doing, it states that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Natural England's *'Agricultural Land Classification map for London and the South East'*<sup>3</sup> shows that all eight of the strategic sites potentially involve land that falls in the category of best and most versatile agricultural land (notwithstanding that one site is a former golf course)<sup>4</sup>. The Council clearly believe that it is necessary for there to be significant development of agricultural land, but has chosen not to include any areas of lower quality land as required by the NPPF.

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<sup>3</sup> See: <http://publications.naturalengland.org.uk/publication/141047?category=23033>

<sup>4</sup> The ALC map shows some of the sites as falling within areas classified as Grade 3 land, but it is not possible to distinguish between Grades 3a, b or c. Only Grade 3a is 'best and most versatile'.

The nation is beginning to face a serious food security issue and, in order to help ensure that the nation can feed itself in the future without increasingly relying on imports, it is essential that our valuable and most productive agricultural land is protected from development – or at least its loss is minimised. We appreciate that the NPPF does not rule out the development of high quality agricultural land, but it does require account to be taken of the wider economic benefits of high quality agricultural land and that areas of poorer quality land should be used in preference.

The proposed strategic sites are assessed in the SA as having a ‘major negative’ effect in terms of land use (Objective 14)<sup>5</sup>. Despite this, the proposed loss of such extensive areas of productive agricultural land, in preference to other alternative opportunities, has had little consideration in formulating the spatial strategy. This is starkly evident by the fact that the protection of high quality agricultural land is not a matter considered to be of any strategic significance – there is no reference to agriculture in the Plan’s Vision, the local definition of sustainable development or in any of the strategic policies. Whilst Policy EMP12 seeks to protect the best and most versatile land for the long term, the Policy expressly excludes this in determining allocated sites. This approach is contrary to paragraph 112 of the NPPF.

It is also of concern to us that it will be difficult to assimilate these very large sites into the landscape and into the communities that they will be attached to. Whilst we would accept that the use of any greenfield land for development will have a potentially negative affect in this regard, we would submit that the impact is much greater when large sites are involved. In this case, the SA of the SHLAA sites<sup>6</sup> shows that five of the proposed strategic sites are assessed as having a significant negative impact against SA Objective 5 whilst three are assessed as having a minor negative effect. Two of the sites – south Canterbury and Sturry – actually involve land designated as being of high landscape value. We would submit that a strategy that favoured smaller sites would not have such a profound impact. The promotion of such large sites results in urban sprawl and settlement coalescence. The fact that the Council has felt it necessary to define a number of very small green gaps to prevent total coalescence underlines the profound effect that the proposals have on the existing communities.

It is the Council’s view that these very large greenfield allocations are needed to deliver the scale of development required under the preferred Scenario E. We do not accept that proposition, and we believe that it is the Council’s desire to deliver costly new road infrastructure that has determined both the amount of development and the preferred spatial strategy. We expand on this in point ii) below, but we believe that a spatial strategy that relies on large greenfield sites to deliver a level of house building never before achieved and linked to significant new road infrastructure is undeliverable.

We believe that because future housing delivery will depend so heavily on these large and complex sites, reliance on them is risky. Successful delivery of the sites is a major concern we have, especially given the scale of new infrastructure provision associated with them. We have seen no evidence to give us comfort that any of these sites can be delivered, and the time scale in which they will be delivered. For example, the SHLAA provides no assessment

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<sup>5</sup> Sustainability Appraisal of Strategic Housing Land Availability Assessment – Technical Note, AMEC, October 2012 (not included as part of the evidence base on the Council’s web-site).

<sup>6</sup> As above

of availability and achievability despite these being key components of the usual SHLAA methodology and as required by the second bullet point of paragraph 159 of the NPPF. Also, despite reference to it in paragraph 2.28 of the consultation draft, a housing trajectory is not provided in Appendix 2 so it is impossible to see how and when the sites are anticipated in making a contribution.

We also consider that reliance on a handful of large greenfield sites will limit choice in the housing market. Paragraph 50 of the NPPF requires local planning authorities to deliver a wide choice of high quality homes, whilst paragraph 47 requires there to be choice and competition in the market for land. With so much of the housing to be provided at large developments in a very few locations, effectively the only choice that people will have on where they want to live is between competing suburban developments. Whilst the sites will provide the opportunity to provide a range of housing within them, they will inevitably be formulaic ‘anywhere’ developments provided by the national house builders in accordance with off-the-shelf housing designs, despite notions of ‘garden city’ principles as advocated in Policy SP3i, which will only add further to costs. Real consumer choice can only be achieved by providing a much wider range of housing sites which will provide real opportunities for unique and distinctive developments by a wider range of developers. The spatial strategy does not provide this necessary choice.

ii. Reliance on new road infrastructure: As we have explained in point i) above, we believe that the spatial strategy and the selection of sites is predicated on the Council’s desire to provide new road infrastructure. In particular it seems to us that it is the Council’s ambition to provide a new ‘eastern road corridor’ between Herne Bay and the A2, articulated by the following proposals:

- A relief road for Herne (as part of the proposed Strode Farm site – Policies SP3e and T14);
- A realignment of the A291 and a new Sturry crossing (as part of the Sturry/Broad Oak site – policies SP3b and T15);
- The possible eastern Canterbury by-pass (paragraphs 1.66 & 5.57);
- New distributor road and A2 Bridge interchange (as part of the south Canterbury site – Policies SP3a and T13).

Road infrastructure proposals are so fundamental to the spatial strategy that we believe they have driven the site selection process. They are particularly crucial to the delivery of strategic sites SP3a, b and e, though other sites will be dependent upon infrastructure provided at these sites. Together with Herne and Broomfield Parish Council we have commissioned independent transport planning advice on the proposed new road infrastructure. The advice we have received highlights the potential cost of the new road infrastructure required is likely to be in excess of £100m (see Annex B). It also highlights the infrastructure linkages between the proposed sites, especially the key role to be played by the Sturry crossing. However, the lack of an implementation plan means that it is impossible to see how it is proposed that the infrastructure will be developed and how it will be phased with development. There is the real risk that the whole ‘house of cards’ will collapse if any element of the infrastructure is delayed or not delivered, meaning that the whole plan strategy will fail. The consultation draft seeks to give reassurance that key infrastructure will be delivered by stating that Memorandums of Understanding have been signed by the City Council, Kent County Council and site owners/agents (see paragraphs 5.54 and 5.55).

However, Kent County Council Highway officers have confirmed to us that no such Memorandums of Understanding have been signed. The consultation is therefore misleading. What is more, no contingencies are included in the plan in the eventuality that the essential road infrastructure is not provided.

Such is the cost of this new infrastructure that paragraph 1.86 of the consultation draft suggests that for the strategic sites a “nil CIL” (Community Infrastructure Levy) could be applied, meaning that local communities will not benefit at all from the major development proposed. This is despite changes made to the CIL regulations which mean that local communities who are being asked to ‘host’ new development can expect to receive a proportion of the CIL – at least 15% and 25% if they have a Neighbourhood Plan. The City Council, though, is contemplating removing even this benefit by charging a ‘nil CIL’. This is entirely unacceptable, and contrary to Government expectations. To be contemplating this, though, it is clear that the cost of the proposed infrastructure is significant, and probably too great for the developments to bear when taken together with the other planning obligations that will fall on them. This will only result in sub-standard and unsustainable communities. It should certainly not be the case that the local communities impacted by such major development should be deprived of any potential benefits that would normally be expected from it under the CIL.

It is clear to us, and we have seen no information to the contrary, that the delivery of the planned road infrastructure is unachievable meaning that the spatial strategy is undeliverable. Consequently, we believe that the proposals are contrary to paragraphs 173 to 177 of the NPPF. It is our strong view that the spatial strategy is wrong in placing such a reliance on the provision of new road infrastructure, the delivery of which is far from certain. Consequently, CPRE Protect Kent objects to the spatial strategy on this basis.

We do not believe that it is appropriate for the spatial strategy to be driven by the provision of costly new road infrastructure, i.e. to locate new development where the Council consider that new road building is needed. We fail to see how a Local Plan can be developed before a coherent Transport Strategy and Action Plan is in place, so that transport solutions as a whole can be integrated within the spatial strategy. To this end, we believe that priority should be given to locating new development where it is needed and where it can be sustainably accommodated, and only then should transport solutions (if needed) be considered, in accordance with an agreed Transport Strategy.

The proposed spatial strategy, which is so fundamentally based on new road infrastructure, will be high cost and environmentally damaging. It will also increase in-commuting and congestion, as confirmed in the Sustainability Appraisal of the development scenarios<sup>7</sup>. It also means that there is a lack of joined-up transport planning and routes for anything other than motorised transport.

It is well known that building roads, or indeed improving existing ones, draws in more traffic, and thereby not only makes conditions worse on surrounding existing roads, but fails to achieve the objectives of reducing the impacts of motorised road traffic as intended. The classic example of this is Newbury, which like Canterbury now has an inner and an outer

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<sup>7</sup> See the third paragraph of paragraph 3.2.5 of the Sustainability Appraisal of the development scenarios, AMEC, June 2012

bypass, both of which have experienced increased traffic<sup>8</sup>. Hence building roads might appear to solve some local congestion, but in reality is likely to have far greater negative effects on the city's transport network and on the environment due to increased road traffic and congestion. This would conflict with the Council's aim of reducing traffic across the District, and will inevitably result in increased air pollution, climate emissions, noise and other environmental impacts. It is all the more remarkable that such major road building is being proposed, when at paragraph 5.20 of the consultation draft it is stated that *'building more roads to meet demand is unaffordable'*. As we have already explained, we believe that the road proposals are undeliverable due to the likely cost involved.

We consider that a more effective use of funds would be to invest in more sustainable modes of transport which, compared to new road building, is relatively cheap. Indeed, as acknowledged in paragraph 5.20 of the consultation draft: *'The best way to achieve reliable journey times, while maintaining and improving access and avoiding traffic build up, is to shift to more efficient ways of travelling that take up less road space. The way of doing this is to promote alternative forms of travel such as walking and cycling for short journeys and bus and rail use for longer journeys.'* We consider that a spatial strategy based on these principles rather than on new road building should be promoted in the Plan.

- iii. *Failure to address housing needs in all the Market Areas*: As we have explained in points i) and ii) above, we consider that the sequential approach/spatial strategy in the consultation draft has been driven by the identification of large greenfield sites essentially to deliver new road infrastructure. This approach has paid no regard to how the 'objectively assessed housing need' in the market areas is to be met, as required by paragraphs 47 and 159 of the NPPF. We object to this failure.

The '*Strategic Housing Market Assessment for the East Kent Sub-region*' (SHMA) defines five housing markets within Canterbury District, as follows:

- The Greater Canterbury Housing Market Area (HMA)
- The Herne Bay HMA
- The Whitstable HMA
- The East Kent Rural North HMA (part)
- The East Kent Rural South HMA (part)

It is not unusual for a Local Plan to base its spatial strategy on meeting the needs within the respective HMAs and to set development targets and make allocations for each of them, reflecting of course the sequential approach and the settlement hierarchy and the available sites identified through the SHLAA process. However, the spatial strategy promoted in the consultation draft does not do this, and works entirely on the basis of a district-wide development target which is then arbitrarily distributed largely on the basis of large greenfield allocations and new road infrastructure proposals. The outcome is that the needs of the rural HMAs have been essentially disregarded.

Although 956 dwellings are proposed for the rural HMAs, all of the 931 dwellings proposed in the Rural North HMA are at Hersden and just 25 dwellings on one site at Barham are

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<sup>8</sup> See <http://transportforqualityoflife.com/u/files/Beyond%20Transport-Infrastructure-supplementary-report%20Aug2006.pdf> for an analysis of the five-years after the opening of the A34 Newbury Bypass

proposed for the Rural South HMA<sup>9</sup>. None of the allocations carried forward from the 2006 Local Plan fall in the rural HMAs, whilst the existing planning permissions falling in the rural HMAs are predominantly small infill sites of 1 or 2 dwellings. Essentially the needs of the rural areas are being left to speculative planning applications in accordance with the settlement hierarchy, and the provision of rural exception sites. This does not provide any certainty that rural housing needs will be met.

Although we do not object in principle to planned expansion at Hersden, if this is supported by the local community (see our comments in section c) below), we are concerned that the housing needs of the other rural communities are being ignored by the preferred spatial strategy. Most disappointingly, there has been no direct and specific engagement with the rural communities to discuss their needs and how to plan to meet them. Instead, the Council has simply dismissed small-scale development in the rural communities as a dispersed strategy that is unsustainable in character, even though the SHMA and the Council's housing strategy recognises the need to broaden choice and to address issues of affordability in the rural areas. We consider that the spatial strategy must better reflect and address the needs of the rural communities.

c) The Proposed Sites

In this section we provide our comments on the sites proposed for inclusion in the Plan, i.e. those covered by policies SP3a – h, HD1, EMP1, TCL7 and TCL10. We comment on each site in turn below. As a general point, though, we find that the policy guidance on the proposed sites is lacking. In particular we consider that more supporting text is required to explain what is actually proposed for each site and how they will actually be developed. This should then be reflected in the individual policies themselves. As it stands, the reader is left very unclear about what considerations will be taken into account at each site and how it is envisaged the sites will progress.

Comments on Sites:

i) South Canterbury (Policies SP3a and HD1): At 320 hectares (800 acres - 1.25 square miles) this is a very large greenfield site, and is allocated for 4,000 dwellings and 70,000 sqm of employment floorspace. A new junction onto the A2 is also proposed. Whilst a range of social and community facilities are also proposed, together with open space and new woodland CPRE Protect Kent **objects** to the allocation of this site for development, for the following reasons:

- **Unsustainable urban sprawl:** the site is located on the south eastern edge of Canterbury between 1.5 and 3.5 km (0.9-2.1 miles) from the city centre. This is a similar distance from the city centre as Upper Harbledown, Blean School, Tyler Hill and Sturry. The site measures a maximum of 2km (1.2 miles) from south west to north east and a similar extent at its maximum from north west to south east. Currently the built edge of the city extends 2km (1.2 miles) from its centre and this distance would increase to 3.3Km (2miles).

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<sup>9</sup> Although the proposed site at Sturry/Broad Oak is claimed to be a 'rural site' it actually falls in the Greater Canterbury HMA.

This development will result in a 20% increase in the population of the City, but for Barton Ward the increase will be 108%.

CPRE Protect Kent considers that the site comprises unacceptable urban sprawl by extending the existing compact urban form in an illogical fashion into the countryside. As stated in paragraph 9.23 of the consultation draft *“Canterbury is a compact City in a valley setting that provides for a close relationship between the town and its surrounding rural landscape.”* We consider that such a major expansion of the City completely disregards this essential relationship which defines the character and setting of the City. The urban edge is contained within a natural bowl at the south eastern edge, and this development will spill over the top of this. Providing such a large development on one side of the city is structurally flawed and would lead to an unbalanced whole. A city that has grown organically like a tree over many centuries would, over a twenty year period, have a huge lop sided and unnatural growth welded onto it. This will result in a satellite community that will be entirely dependent upon the private motor car for the vast majority of the trips made by the planned population. Because of this, and the huge area of countryside that will be lost, the proposal comprises urban sprawl and unsustainable development, contrary to the objectives of the NPPF.

- **Loss of high quality agricultural land:** The site comprises mainly (if not entirely) grade 1 agricultural land, and therefore it is the best quality of land for agricultural purposes. It is a requirement of the NPPF (paragraph 112) that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. In so doing, it states that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. In allocating this site, in preference to others or a smaller allocation, the Council has not complied with the NPPF by taking into account the importance of agricultural land.

The nation is beginning to face a serious food security issue and, in order to help ensure that the nation can feed itself in the future without increasingly relying on imports, it is essential that our valuable and most productive agricultural land is protected from development – or at least its loss is minimised. The NFU has recently made a statement that one third of all the food we consume each year is imported and that the cost of these imports and transporting them to the UK is rapidly increasing. It is also the case that the populations of the exporting countries are often adversely affected by the export trade, for example in terms of water used for exported crops; pollution from transport; de-forestation; and flooding as a result of loss of vegetation. These are serious environmental and human problems, and we should not be contributing to them when we can grow so much more of our own food. We appreciate that the NPPF does not rule out the development of high quality agricultural land, but it does require account to be taken of the wider economic benefits of high quality agricultural land and that areas of poorer quality land should be used in preference.

- **Landscape and visual impact:** The site is located entirely within a designated Area of High Landscape Value (AHLV) which, according to paragraph 10.13 of the consultation draft has been *“identified to protect the historic and landscape setting of the City and the World Heritage Site”*. Policy LB2 of the consultation draft states that *“Development proposals which would cause unacceptable harm to their local landscape character,*

*archaeological or nature conservation interest will not be permitted.” It goes on to state that “Within the Canterbury AHLV, development proposals should have particular regard to the historic setting of the City and the World Heritage Site.” The consultation draft provides no assessment of the landscape impact of the proposed development, but the SA assesses the impact under objective 5 as ‘major negative’ because of its location in the AHLV. The proposed allocation is clearly in breach of Policy LB2.*

To support the Local Plan the Council has produced a Draft Landscape and Biodiversity Appraisal (DLCABA). The Appraisal analysis of the South Canterbury site is at section 43 (6), which is described as ‘South Canterbury and Littlebourne Fruit Belt’. It is pointed out that the area is grade1 farmland and was formerly *“orchards, high hedgerows and shelterbelts”*. Reference to maps of the early and mid-twentieth century substantiates this. The Appraisal draws attention to the *“remnant shelterbelts indicating where orchards and hop gardens have been lost to arable”*. This gives the area a very distinct and attractive quality compared to many other areas of farmland around Canterbury. The appraisal states that *“The agricultural land abuts tightly to the southern and eastern perimeters of the urban area”* and further notes that the *“A2 cuts through the area to the south, although the road is mostly in a cutting and not generally visible.”* It must be added that this is very much the case, for instance in the vista southwards from The Gate Inn, and is further augmented by the original trees and the successful further tree planting undertaken when the by-pass was constructed.

The appraisal says that *“The North Downs Way from Dover to the city centre crosses the area. This is widely believed to have prehistoric origins”* (this pedestrian and cycle route is also known as the Pilgrims Way as it led from Dover to St Martins church in Canterbury and the Cathedral.) *“Modern developments”* it says, *“are limited in extent...”*. It goes on to say that there are *“...direct and imposing views of the Cathedral along New Dover Road to the west of the ridgeline (just to the east of the built up edge of the city) and from near the junction with the A2”*. It goes on to explain that *“To the east of this ridge the open agricultural character dominates, but is contained by a wooded effect created by numerous hedgerows, groups of trees and the vegetated railway cuttings”.... “the gently rolling landform creates a series of ridges and valleys running generally south west to north east across the character area”. “... visibility on the ridges increase creating good views of the city and the cathedral. These ridges are particularly sensitive at Little Barton Farm.”... “...the higher ground plays a role in containing views from the city and forming an important break between the urban and rural areas”.*

The Appraisal sets out guidelines to ensure *“... the conservation of the strong landscape pattern and improvement for those areas that are in poor condition, whilst respecting the most sensitive areas”*. In this regard it explains the need to *“resist unsympathetic land uses on visually sensitive ridgelines, exploring ways of enhancing the approach to the city along the North Downs way and Watling Street in sympathy with their historic significance.”* Additionally the appraisal requires that plans should *“avoid urban fringe uses which detract from the otherwise simple pattern of the landscape, and improve boundary treatments with the use of native hedgerows to help screen inappropriate fencing and to filter views of urban fringe uses.”*

The Inspector’s Report on the 2004 Canterbury District Local Plan shows him agreeing with an objector to development in the area saying that *“...it remains true that the Barton*

*Business Park forms a distinct and hard edge to the city, sharply defining the break between the town (sic) and the countryside, while the Business Park appears as an isolated group of buildings away from the urban area. Building on the site would be an intrusive form of ad hoc piecemeal development, extending the urban area into the countryside, and impinging visually into the green band on the valley side”.*

Of all the environs of the city, the area south east of the urban edge of Barton is the most immediately rural. There are only six houses within the huge area of the site and a further two at its fringe. The most obvious view having left the city at the Gate Inn is down the Dover Road which has a completely rural aspect. As mentioned earlier the view from this point to the south is again intensely rural and the park and ride site and the by-pass being virtually invisible. Views off the rural part of the Dover Road to the north east, are again most attractive with agricultural land set into folds between belts of woodland and hedge.

Once the lane off this road to the north is explored, it is even more apparent how appealing the countryside is. At the junction to the North Downs Way and the lane branching from it the view back towards the city is apparent. Nothing can be seen of the nearby urban edge, other than The Gate Inn, which appears as an isolated rural building in spite of its proximity to the built-up area. As if by magic, one is unaware of the nearby suburb; the deceit being created by the natural topography of the land and the woodland and hedgerows. Moving nearer to the urban edge, from the south east of the ridge on the city side of the road to Barton Business Park, the hillside and hedgerow hide virtually the whole of Canterbury allowing only the tip of the cathedral the windmill and little else to show.

Arriving at the edge of Canterbury from the southeast, again the view is very open, only the 1960's rectangle of St Anselms School projecting upwards indicating the near presence of a built up area.

The North Downs, or Pilgrims Way, leaves Canterbury through the suburbs including a residential road, but then, suddenly it becomes a narrow lane through a rural environment, interrupted only by the Barton Business Park, after which it takes on a picturesque format with twists turns and inclinations. This Way and the adjacent countryside form a valuable rural resource for Barton.

The land to the south west of the area intended to be developed is again rural in nature, only the northern tip adjacent to 'The Foreland' being subject to the impact of development.

The consultation draft indicative proposals plan does show the retention of and additions to, the woodland and hedgerows, but within this is the imposition of vast areas of development without any reference to the DLCABA. The inclusion of large areas of amenity space only increases the outward extent of the development, the most intrusive part of which is the 'tongue' poking into the rural environment at the east side.

In proposing this allocation, no account seems to have been taken of the topography which is set out above. The visually most prominent part of the site is adjacent to the Gate Inn because of its altitude. Notwithstanding this, the City Council has chosen that

location for the community hub which, it is stated, will include high density housing. So the highest part of the site would have the most prominent structures.

The DLCABA asks for the enhancement of the Watling Street and North Downs/Pilgrims Way and yet, the indicative proposals plan shows that Watling Street is surrounded by development with a new distributor road right next to the North Downs Way and two further roads crossing it. The consultation draft makes no reference at all to this important ancient route.

Policy SP3i suggests that this, and the other developments in the Plan, will reflect Garden City principles. The Garden City was an attempt by Ebenezer Howard to achieve an alternative to what was, at that time, seen as grim Victorian towns. It must also be remembered that Garden Cities were conceived before the motor car had achieved any ubiquity and at a time when there were five persons per house, not the 2.3 we have now. We believe that this reference is little more than a public relations name. It is almost as if the inclusion of the term “garden” will make it seem meritorious.

Having regard to the above, CPRE Protect Kent consider that the proposed site in South Canterbury, and how it is envisaged that it will be developed, conflicts fundamentally with its designation as a AHLV and the approach towards landscape character as described in the DLCABA . The proposed development site will destroy the landscape quality of the area, and it will be highly visible in this intrinsic rural area. It would lead to a most unattractive and prominent introduction to the setting of the City of Canterbury.

- **Transport:** The transport implications of this major development site are of serious concern to CPRE Protect Kent. The consultation draft indicates an ambition to achieve a new four- way slipped junction to the A2 on the south boundary of the site. This, as considered in the report of our transport advisor, will cost in the region of £25m (see Annex B). We believe that this, and the cost of other essential infrastructure, will make the development undeliverable as we explain in more detail in our comments on the spatial strategy generally (section b) above).

In addition to cost, though, we are also extremely concerned about the impact the development will have on the road network. A comprehensive assessment of traffic in Canterbury is provided in “*Unlocking The Gridlock*”<sup>10</sup>. This was published by the City Council in 2004 and provided a ten year action plan. Whilst the information it provides on traffic flows is a little dated, the consultation draft explains (paragraph 5.22) that traffic volumes have stabilised in recent years. It remains reasonable, therefore, to rely upon its data. The document provides traffic flows for the principal routes into the City, and that given for the Old Dover Road is stated as 13,342 vehicles per day at the A2 end. However, to this should be added an inflow of 5,759 from Nackington Road giving a total of 19,101. This can be compared with 18,053 for the A28 at Sturry, 10,921 for the A28 near The golf Course ,20,616 for Ashford Road Thanington and 18,806 for the to the west of the Rheims Way.

At Appendix 3 of *Unlocking the Gridlock*, there are indications of ‘*Typical Weekday Queue Length at 8.30 a.m.*’. In each case the queue length is measured from the ring

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<sup>10</sup> See: <https://www.canterbury.gov.uk/media/281827/canterburydistricttransportactionplan.pdf>

road. That for the New Dover Road extends to The Gate Inn, a distance of 2.5 Km (1.5 miles). Other queues are 2.25 km (1.35 miles) for Sturry Road, 1.9 km (1.2 miles) for the A257, 1.55 km (1 mile) for Wincheap/Thanington and 1.25 km (0.75 miles) for the Rheims Way. It is the case that the two roads with the longest queues, Sturry Road and The New Dover Road would be the two with the greatest impact from proposed developments - South Canterbury in the case of New Dover Road.

An additional pressure on the Old and New Dover Roads is the presence within the Barton Ward of five out of the ten state secondary schools within the Canterbury City Council District. The submission by The Oaten Hill and District Society to the 2004 inquiry into the Local Plan explains this in some detail.

It is clear to us that the significant development proposed at South Canterbury will exacerbate the existing traffic situation in the Barton Ward, which will see a 108% increase in its population, but the consultation draft is silent on the issue. It does however, at paragraph 5.11 assert that the aim of the Plan is to keep *“traffic movements on Canterbury’s ring road to 2011 levels”*. That, we believe, is an ambitious aim, especially as the proposed development at South Canterbury will mean far more traffic entering the ring road at the St George’s Place junction.

We do not believe that if the new A2 junction were to be provided it would take traffic away from The Old and New Dover Roads. Indeed, we believe that the new junction would be used by more vehicles to access the City and for ‘round City periphery trips’. Thus, even without any development, traffic levels on the Old and New Dover Roads will increase. The current long distance of the junction from the City and the convoluted link from the A2, from the west, acts as a deterrent to much of the current traffic that would otherwise use it. In addition the proposed development itself will add to the existing levels of traffic on the New Dover Road.

In addition, the proposed location of the ‘community hub’ adjacent the Gate Inn, is likely to attract shopping traffic from outside.

It could be that an eastern by pass, as suggested in paragraphs 1.66 and 5.57 of the consultation draft, might remove some of the extra traffic, but this is just an uncosted and long-term ambition (we comment further on this in Part 2 of our response) which is extremely unlikely to be in place during the lifetime of this Plan, and probably well beyond if ever.

It is also a proposal in the consultation draft to enhance the capacity of the Park and Ride in the City by 800 spaces, of which 400 spaces would be at New Dover Road. Thus half of the extra capacity is proposed at South Canterbury, which will also add to traffic movements on New Dover Road as well as the attendant shuttle bus movements to satisfy it.

In addition, at paragraph 5.51, there is what is optimistically called *“a fast bus link”* which would have a dedicated trackway through the development extending west, to link into South Canterbury Road to the west of the Hospital via the entrance to the Bowls Club. From that point onwards, however, it would not be fast, as it would be subject to the congestion, as shown in Unlocking the Gridlock, in Nunnery Fields and the Old Dover

## Comments from CPRE Protect Kent

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Road. The consultation draft does not indicate whether this bus route would include use by the Park and Ride vehicles. The input of the extra buses to the narrow Nunnery Fields, which has a minimum carriageway width of 4 metres, would generate health and safety issues and its own congestion. It is not apparent that the local community in that area has been consulted on the idea.

There is no evaluation of this concept in the consultation draft, just the one line at paragraph 5.51 and an (apparently incorrect) indication of its position through the Hospital site on the Draft Development site map. In principle we would support the concept of the 'fast bus', but we consider that the idea has been put forward here as a vague notion to provide the impression that sustainable transport options will be provided. However, from the northernmost tip of the development site the 'fast bus' would have to travel in an arc of some 4.5 km (2.7 miles) to reach the city centre, which, with the necessary approximately seven stops and on-route congestion, would make it a long journey time. The direct distance of the journey to the City centre would be 2km (1.2 miles), potentially making journeys by car more attractive.

Therefore, in traffic terms, CPRE Protect Kent has serious concerns about the impact of such a major development on the existing road network. We cannot see how the traffic from such a large development can be accommodated on a network that is already under stress. Furthermore, the proposed new interchange on the A2 will accentuate the problems as it will attract more traffic.

**Conclusion:** for the above reasons CPRE Protect Kent object in the strongest terms to the proposed allocation at South Canterbury. However, we would not rule out some development in this location, and despite the fact that it is grade 1 land we believe that SHLAA site 86 would provide an opportunity for development that we consider could integrate with the existing community with minimal impact on the landscape character of the area and the landscape setting of the City. This should be investigated and consulted on with local people. In particular we have reservations about the achievement of acceptable access to the site, which will have to be from Nackington Road, but the site should not be ruled out simply because of this. However, we would not advocate 500 dwellings here, as suggested in the SHLAA, and feel that 300 dwellings would be more appropriate.

- ii) Land at Sturry/Broad Oak (Policies SP3b and HD1): This site, comprising 43 ha of land, is allocated for 1,000 dwellings and an undefined quantity of business/office floorspace. Fundamental to the development is the provision of a proposed new Sturry crossing bridge and re-alignment of the A292 through the site and closure/partial closure of the existing crossings at Broad Oak and Sturry.

CPRE Protect Kent **objects** to the allocation of this site for development, for the following reasons:

- **Impact on landscape:** On Inset 1 of the District Proposals Map it can be seen that the larger part of the site consists of Den Grove Wood all of which is in an Area of High Landscape Value (AHLV). This Area was designated in 1998, or perhaps even earlier. It adjoins farmland at present uncultivated, as well other small parcels of woodland and

uncultivated farmland. The current Local Plan Map shows that what is now uncultivated land was formerly orchard land.

Under Policy R7 of the adopted Canterbury Local Plan, the AHLV is recognised as having local importance in terms of the quality of the landscape and/or the special landscape role it performs. It states that planning permission should not be permitted where development would cause unacceptable harm. This approach is essentially repeated in Policy LB2 of the consultation draft.

It is instructive to read the Inspector's report following the Inquiry into the current Local Plan, when he stated that reasons for AHLVs and Green Gaps were for the prevention of damage to the City Setting, to provide additional protection for land over that afforded by ordinary open countryside policies, and, in the case of Sturry, also to prevent development spreading towards the ancient woodland and High Landscape Area to the North.

On walking through Den Grove Wood, to which there is public access on foot, one is struck by there being far more woodland than appears on the District Proposals Map, that the woodland is deciduous with mostly native trees, that it is in good condition, and that there are many good quality mature trees. It is also apparent that it provides very useful air quality improvement and acts as a "green lung" to reduce the poor air quality in and around Canterbury at peak times, as well as being a tranquil area with much wild life and vegetation which must do much for the social well-being and health of local residents.

The woodland rises steeply from the Stour Valley to the residential area of Broad Oak at Sweechgate, and within it are areas of charming dips and hollows. We believe that the Council was right to designate it as an AHLV. It provides a valuable separation of Sturry from Broad Oak and from the urban area of Canterbury which starts at Shalloak Road.

In terms of agricultural grading, we believe that the farmland comprises land of grades 2 and 3<sup>11</sup>. It is certainly the case that the area to the North of Den Grove Wood has been used for fruit or other crop production in the past.

On page 110 of the draft Landscape and Biodiversity Appraisal (DLCABA) there is a detailed description of the Stour Valley Slopes which include the allocated site. On the Plan on page 113, a large area of Den Grove Wood is shown as ancient woodland, and the DCLABA points out that this area provides a *"significant opportunity to extend and buffer the woodlands of the Blean Southwards into the Stour Valley towards Canterbury, also linking the small blocks of woodland scattered throughout the Stour Valley Slopes area between the University of Kent and Broad Oak"* thus providing a Habitat Network Opportunity.

Again referring to the above Appraisal the action guidelines for the Stour Valley Slopes include *"Strengthen and recreate the traditional field pattern"*, *"Promote active coppice management of designated woodland habitat where appropriate"*, *"Resist further fragmentation and seek to create new woodland or woodland corridors where significant opportunity exists between the University and Broad Oak village"*, and *"Resist the*

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<sup>11</sup> See: <http://publications.naturalengland.org.uk/publication/141047?category=23033>

*introduction of dominant features on the visually sensitive ridgeline."* The summary of these action guidelines is that the area should be "*restored and improved*", and nowhere is it suggested that any form of further development should be considered.

CPRE Protect Kent considers that the allocation of this site for development goes against the acknowledged landscape importance of the area, and the role that it plays in providing the setting of the City. It is contrary to the policies that the Council has in place to protect it from development. Through the access available via the public footpath through the site, it is an area that is enjoyed by many local people. As a result of the development, the character of the public footpath through the site will be entirely lost, together with the local woodland views.

- **Effect upon Sturry, Broad Oak, Urban Canterbury and Fordwich:** The proposed houses and new roads would all but join Sturry with Broad Oak and would continue the urban sprawl of Canterbury from Shalloak Road, Vauxhall Road and the Sewage Works into Sturry and Broad Oak - effectively converting both villages into a suburban area of Canterbury. The proposed green gaps, whilst welcomed, are mere tokenism and an afterthought to create a sense of separation that will not in reality exist. At present the distance on the North side of the railway between Sturry and the start of urban Canterbury is about 1.3 miles. If the site is developed, that distance will reduce to under two thirds of a mile. This can only encourage development of the remaining land to the North of the railway up to Folly Farm. It is ironic, therefore, to see Sturry described in the Rural Settlement Hierarchy as a Rural Service Centre, and then to flood it with 1000 new homes plus expensive and quite complicated infrastructure which would change its essential rural character.

Paragraph 1.70 of the consultation draft sets out the criteria for distribution of new housing sites in rural settlements, and for rural service centres merely states that a higher level of development might be supported. We must ask by whom, as the residents of Sturry and Broad Oak certainly do not support it, and neither does Sturry Parish Council. We must query the Council's Localism approach in making this allocation without consulting with its residents first. The Council appears to be in breach of its Corporate Plan in this respect - in Pledge H the Council states, inter alia, that it will:

- i. Effectively communicate the message about the need for new homes and explain why more new homes are essential.
- ii. Involve local communities in planning sustainable communities of the future.

Fordwich, Sturry and Broad Oak will be deprived of the use of this wonderful wooded and rural area, and of their views of it up the slope to the North. Instead they will see a great number of houses, with lights, noise and a suburban appearance. The efforts of the Sturry residents to make something of their historic village centre, incorporating the Church, Milner Court School and numerous attractive old buildings, will go to waste, and the new development will have adverse effects on all of this, as well as upon the Sturry and Fordwich Conservation Areas. The settings of these Conservation Areas will certainly not be enhanced by the proposals.

- **Transport:** We have commented on transport infrastructure in section b) of this part of our response when we consider the spatial strategy generally. However, in regard to this site new transport infrastructure is key not only to the development of this site, but also to the development of other sites proposed in the Plan. This is explained in detail in the report prepared for us, which is provided in Annex B. We consequently question the ability of this, and other developments, to deliver the extensive new road infrastructure proposed.

In addition, we believe that the development will have a profound effect on Sturry, Broad Oak and Fordwich, as well as upon Canterbury itself, because of the tremendous traffic increase that will funnel on to the A28. The A28 is considered already to be the most congested approach road to Canterbury, and it will be expected to cope with all the potential Canterbury traffic coming from the new development, plus all the traffic emanating from the Hillborough, Herne Bay Golf Club, and Strode Farm new developments, much of which will use the A291 Herne to Sturry Road. The A28 is currently over capacity, and gridlock will result if the Sturry proposals go ahead by themselves, let alone the Herne and Herne Bay developments.

The proposed works explained in paragraph 5.55 of the consultation draft, re: the Sturry Crossing, are costly. Also, in our view, it will not deal with the extra traffic that will be brought upon Broad Oak Road and the A28. We note the reference to the Memorandum of Understanding (MoU) agreed between the City Council, Kent County Council and the relevant site owners/agents, which seeks to give assurance about delivery, but we have been advised that no MoU actually exists. In any event, the Council's history with such MoUs with KCC in the past is not good. We were told that in the Whitefriars Development, the City Council had agreed with KCC that a new Library and Early Learning Centre was to be part of the Development. However, a shop was instead built on the site allotted, and when the position was queried, both Councils said that no documents had ever been signed. This seems to be exactly the same situation here.

- **Air quality:** We believe that air quality will deteriorate further as a result of this proposed development, with a consequent danger to public health, particularly in respect of children, the elderly and those suffering from asthma and chest complaints. The Government has stated that danger to public health is a valid reason for refusing development applications. When announcing its Large Air Quality Management Area (AQMA) which came into force on 25th November 2011, the City Council stated, correctly, that *"Air pollution has now almost encircled the City"* and that *"Air pollution kills"*.

Part of the AQMA is the A28, the Sturry Road, and the AQMA stretched, nearly two years ago from the heart of the City nearly to the Sturry Park and Ride site and the Sturry Road Community Park. Since 2011 there has been further development along Broad Oak Road and Sturry Road, thereby worsening the situation. The increased traffic we have mentioned will not only intensify the traffic fumes, but will enlarge the AQMA even further, perhaps taking in Sturry itself, Broad Oak and the fringes of Fordwich. The City Council is aware that more housing brings more traffic, that more traffic increases air pollution, and that air pollution kills, yet still proposes more housing in an area already suffering from air pollution.

- **Loss of agricultural land:** As we point out above, the proposed site comprises in part agricultural land that is of best and most versatile quality. It is a requirement of the NPPF (paragraph 112) that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. In so doing, it states that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. In allocating this site, in preference to others or a smaller allocation, the Council has not complied with the NPPF by taking into account the importance of agricultural land.

The nation is beginning to face a serious food security issue and, in order to help ensure that the nation can feed itself in the future without increasingly relying on imports, it is essential that our valuable and most productive agricultural land is protected from development – or at least its loss is minimised. The NFU has recently made a statement that one third of all the food we consume each year is imported and that the cost of these imports and transporting them to the UK is rapidly increasing. It is also the case that the populations of the exporting countries are often adversely affected by the export trade, for example in terms of water used for exported crops; pollution from transport; de-forestation; and flooding as a result of loss of vegetation. These are serious environmental and human problems, and we should not be contributing to them when we can grow so much more of our own food. We appreciate that the NPPF does not rule out the development of high quality agricultural land, but it does require account to be taken of the wider economic benefits of high quality agricultural land and that areas of poorer quality land should be used in preference.

- **Pylons:** National Grid has recently stated its preference for new 400kV pylons to be erected along the North Corridor from Richborough to Canterbury to replace the existing 132kV pylons. Part of the North Corridor passes through or close to the northern part of this proposed allocation (near Chapel Lane at Broad Oak). National Grid accepts that overhead cables can affect health, and this new line of pylons is of a considerably higher kV than the existing ones. We are told by National Grid that they are in close contact with the City Council relating to this part of the route, but we believe that the proposed routing of the new power lines through the site will have a serious health risk to future residents, and may profoundly impact on the viability of the development.
- **Effect of development upon residents and others in the villages:** There are substantial numbers of homes along the Eastern side of Sturry Hill A291. At present they overlook the wooded and rural area, and benefit from the tranquillity and air freshness that the site creates. All this will be lost, and the amenities of those in the homes will be adversely affected. They will be overlooking illuminated buildings during hours of darkness, will experience much more vehicle noise and lighting than at present, and their air quality will deteriorate.

To the South of the railway, there is another residential area, being the Sturry Village Centre, and a great many people live and work here. There is also the village church and Junior King's School. At present they have some respite from the A28 traffic by being situated in a sheltered area to the North of Mill Lane A28, from which they look out to the wooded site. All this will change, and they too will suffer adverse effects as described above.

There is residential development to the North and West of the site at Broad Oak which will be close to some of the proposed housing. They too will experience much the same kind of adverse effects.

**Conclusion:** for the above reasons CPRE Protect Kent object in the strongest terms to the proposed allocation at Sturry/Broad Oak. We believe that this development will have significant detrimental harm and that it will conflict with a number of the policies proposed in the consultation draft, in particular policies LB2, LB4, LB8, LB12, LB13 and QL11. Policy SP3b should be deleted from the Plan.

- iii) Hillborough Site, Herne Bay (Policies SP3c and HD1): This substantial site, comprising some 81ha of land, is allocated for 1,000 dwellings and 33,000 sqm of employment floorspace as an extension to the Altira Park. Extensive new road infrastructure would be needed, including, as indicated on the indicative proposals plan, two bridges over the railway. Policy SP3c also suggests that improvements will be needed to secure appropriate access onto the Thanet Way, which could involve the provision of a new west-facing slip road.

CPRE Protect Kent **objects** to the allocation of this site for development, for the following reasons:

- **The site is too large:** As we explain in detail in section b) of this response above, we object in principle to a spatial strategy that relies on a small number of large greenfield allocations. At some 81 ha of land this is amongst the largest of the sites proposed for development. We believe that this spatial strategy has been pursued at the expense of identifying smaller scale opportunities, including previously developed sites, which would be better assimilated into the existing community and the surrounding landscape. As such, we consider that this site comprises unsustainable development because of the extravagant use of undeveloped land it involves.
- **Loss of high quality agricultural land:** The site comprises grade 1 and 2 agricultural land, and therefore it is the best quality of land for agricultural purposes. It is a requirement of the NPPF (paragraph 112) that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. In so doing, it states that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. In allocating this large site, in preference to others or a smaller allocation, the Council has not complied with the NPPF by taking into account the importance of agricultural land.

The nation is beginning to face a serious food security issue and, in order to help ensure that the nation can feed itself in the future without increasingly relying on imports, it is essential that our valuable and most productive agricultural land is protected from development – or at least its loss is minimised. We appreciate that the NPPF does not rule out the development of high quality agricultural land, but it does require account to be taken of the wider economic benefits of high quality agricultural land and that areas of poorer quality land should be used in preference.

- **Costly new infrastructure:** The scale of development proposed will generate a significant level of traffic that will severely impact on the existing local road network, and further afield (e.g. significant volumes of traffic are likely to travel towards Canterbury via the A291 through Herne Village). From advice we have received (see Annex B), the likely cost of the new road infrastructure needed to make the development acceptable will be in excess of £20m. This would be a price tag of around £20,000 per dwelling. We believe that this, and the cost of other essential infrastructure needed to make the development acceptable (e.g. improving sewage capacity), will make the development unviable and undeliverable as we explain in more detail in our comments on the spatial strategy generally (section b) above). This will potentially mean that ultimately the site will be more intensively developed and/or corners will be cut in the provision of open space, new infrastructure and other planning obligations, resulting in a sub-standard development.

**Conclusion:** for the above reasons CPRE Protect Kent object in the strongest terms to the proposed allocation at Hillborough. However, we would not rule out some development in this location, and despite the fact that it is high grade agricultural land we believe that land to the rear of Highfields Avenue, Churchill Avenue and Osborne Gardens provides an opportunity for development that we consider could integrate with the existing community. This should be investigated and consulted on with local people. We feel that around 300 dwellings could potentially be accommodated here.

- iv) Herne Bay Golf Club (Policies SP3d and HD1): CPRE Protect Kent **accepts** the allocation of this site for development, subject to support from the local community. We consider that it provides a good opportunity to help meet the future needs of Herne Bay, and would enable significant areas of open space for community benefit to be provided, as shown in the indicative proposals map. However, we consider that SHLAA sites 12 and 199, which also form part of the golf course site, should also be included in the allocation. Indeed, the SHLAA (summary of methodology and assessment of sites) states that site 12 is actually allocated in conjunction with SHLAA site 208, though it has not been included in either the allocation as shown on the Policies Map or the indicative layout included in Appendix 1. We can see no reason why these two sites should not be included in the allocation. Whilst the SHLAA worksheets would suggest that these two additional areas could accommodate 104 units, we consider that a capacity more in the region of 75 units would be appropriate. Consequently, we consider that the overall capacity for the enlarged site should be 475 units.

However, whilst we accept the sites we have serious concerns about how access to it will be achieved, and how the traffic will be accommodated on the wider highway network, especially on Bullockstone Road which is winding and narrow. The Local Plan will need to ensure that the traffic from the development can be safely accommodated on the highway network.

- v) Strode Farm, Herne Bay (Policies SP3e and HD1): This site, comprising a little under 40 ha of land, is allocated for 800 dwellings and 15,000 sqm of employment floorspace. Major new road infrastructure is proposed in the form of a new relief road for Herne village which will run through the site from the Eddington roundabout to Bullockstone Road.

CPRE Protect Kent **objects** to the allocation of this site for development, for the following reasons:

- **Development is unrelated and out of scale with the needs of Herne village:** It would seem that this significant development of 800 dwellings is justified purely on the basis that Herne village is defined in the settlement hierarchy as comprising part of the urban area of Herne Bay. The consultation draft provides no explanation as to why this site has been selected for development and why the Council considers it appropriate to add 800 dwellings to a village community in this way. It seems to us that this is because Herne village is seen as part of the urban area of Herne Bay, the Council considers it acceptable for Herne to meet the needs of the Herne Bay urban area. Herne, though, is a separate community to Herne Bay; it is a village with its own unique character and community. The proposed development does not respect that fact or give any recognition to the major impact that it will have on the nature of the village and its community.

CPRE Protect Kent believe that it is fundamentally wrong to see Herne village as part of the Herne Bay urban area, notwithstanding the fact that there has been significant development at Broomfield in recent years. Indeed, because there has been that development it is all the more important that the individual character of Herne village is respected and protected from further major development. As proposed the development is too large and out of scale with both a village environment and the specific needs of the village.

- **Loss of green gap/separation between Herne village and Herne Bay:** Together with the Herne Bay Golf Club site (Policy SP3e) this proposal will fill in the remaining open green gap between Herne village and Herne Bay. This confirms our belief that the City Council has no regard to the separate identity of the village and simply sees it as part of the Herne Bay urban area and is content for it to be subsumed into the urban area. This shows a complete contempt for the Herne community, which is underlined by the fact that there has been no engagement with the Parish Council or the local community during the plan preparation period to discuss options for growth.

CPRE Protect Kent accepts the allocation of the Golf Course site for development as we believe that it provides a good opportunity to help meet the future needs of Herne Bay, and would enable significant areas of open space for community benefit to be provided. However, the allocation of the Strode Farm site in addition to this will undermine the nature of the proposed development at the Golf Course site as shown in the indicative proposals map. Rather than being an edge of town development, with large expanses of open space which would relate to the open countryside beyond, it will become a development embedded in the urban area. This will undoubtedly influence the final design of the Golf Course site, as it will be the Strode Farm site that will be seen as the edge of town site providing connection to the countryside beyond, not the Golf Course site.

Of fundamental importance, though, is the need to prevent the complete coalescence of Herne village and Herne Bay, and the Strode Farm site is key to this. To ensure this, the Strode Farm site should not be allocated for development, but instead is should be designated as a green gap under Policy OS5.

- **Agricultural land and landscape:** The draft Landscape and Biodiversity Appraisal (DLCABA) places the Strode Farm site in the Greenhill and Eddington Fringe Character Area (no. 13). This is a small character area which, whilst of little intrinsic quality, is noted in the DLCABA as being “*highly visible*” because of its undulating topography. This is particularly so in regard to the Strode Farm site. However, it is proposed that almost the entire character area is developed by virtue of the proposals made under policies SP3d, e and f and HD1. The only part of the character area not proposed for development in the consultation draft is the plotlands at the Abbotswood Estate, which are already semi-developed in any event. The character area will, therefore, be entirely lost.

The only remaining ‘rural’ part of the character area is the Strode Farm site which is in agricultural production. Whilst the agricultural land quality here is grade 3 (potentially grade 3a) the land is intensively cropped, and as such creates a clear distinction between rural and urban in this location. The elevation of the land and its visibility in views underlines this fact. It is, therefore, a prominent site in the landscape which helps to provide the rural setting for both Herne Bay and Herne village. As such it provides the essential green gap between Herne village and Herne Bay and helps to define Herne as a self-contained community.

- **Impact on the Conservation Area:** The proposed development site lies immediately to the north of the Herne Conservation Area, much of which covers the rural landscape to the south. Policy HE6 of the consultation draft seeks to protect Conservation Areas from development both within them and adjoining them. It states: “*Development, in and adjoining a conservation area, which would harm its character or appearance, will not be permitted*”. It goes on to say that development affecting the setting, or views into and out of a conservation area, should preserve or enhance all features that contribute positively to the area’s character or appearance. This should include the need to protect landscape.

We believe that the proposed development at Strode Farm will have a significant negative effect on the open setting of the Conservation Area and will have a profound effect on views in and out of the Conservation Area. In particular the view from Home Farm will be lost. We note that the SA considers the impact on both the countryside and the historic environment to be ‘minor negative’ (objective 5), based on a proposal involving 525 dwellings. We disagree with that assessment and have no doubt that it will have a ‘major negative’ effect, especially given that it is now proposed for 800 dwellings and employment uses. It is clearly the case that the development will conflict with the Council’s own policy to protect the setting of conservation areas, as proposed in Policy HE6.

- **Infrastructure proposals:** The proposed development includes the provision of a relief road for Herne village, which would comprise a new road from the Eddington roundabout through the site joining to Bullockstone Road. Bullockstone Road itself would then need to be improved to accommodate the additional traffic that would be channelled on to it – not just from the development at Strode Farm itself, but potentially all the traffic travelling between Herne Bay and Canterbury.

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The advice that CPRE Protect Kent and Herne and Broomfield Parish Council has obtained sets out a number of major concerns with this proposal (see Annex B). These can be summarised as follows:

- The ability of the Eddington Roundabout to accommodate a sixth leg;
- The ability of Bullockstone Road to take additional traffic without major up-grade due to its poor alignment, narrow width in places and structural weakness. It is also subject to a weight limit;
- Concerns about rat-running;
- Lack of details about the proposal;
- The lack of an implementation plan showing how and when the road will be provided, particularly having regard to the phasing of other proposed sites and the provision of other new road infrastructure related to them; and
- The ability of the development to fund the road improvements as well as the full range of other planning obligations.

These are serious concerns, and lead us to the conclusion that the road proposal is highly aspirational making the whole development proposal high risk and potentially unviable. A development proposal cannot be seriously promoted on the basis of such aspiration and risk.

**Conclusion:** for the above reasons CPRE Protect Kent object in the strongest terms to the proposed allocation at Strode Farm and Policy SP3e should be deleted from the Plan. Instead we ask that the site is identified in the Local Plan as a green gap under Policy OS5.

- vi) Land at Greenhill, Herne Bay (Policies SP3f and HD1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed, subject to support from the local community.
- vii) Thanet Way site, Whitstable (Policies SP3g and HD1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed, subject to support from the local community.
- viii) Land North of Hersden (Policies SP3h and HD1): This site, comprising some 60 ha of land, is allocated for 800 dwellings with 1 ha being put aside for business space. It is also proposed that the new development will provide a new community building, play areas and allotments and a multi-use games area.

CPRE Protect Kent accept that there is potential to expand Hersden village, and in so doing to help improve the range of social and community infrastructure available to the residents. A prerequisite to this however, must be the support of the village and we see no evidence in the plan that there has been the necessary community consultation undertaken to endorse the expansion as proposed.

Notwithstanding the above, we **object** to the development of land on the northern side of the village as we believe that if expansion is supported by the community it should occur on the southern side of the village making maximum use of the previously developed land available there (i.e. SHLAA site 41). We note that paragraphs 1.58 – 1.61 acknowledge the potential of this site but see it as being in addition to that currently proposed. However,

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we note that the Council is concerned about potential impacts on the adjoining Stodmarsh National Nature Reserve. We understand that the site promoter is in dialogue with both the Council and Natural England on this issue and we believe that a solution to the concerns is possible. This will inevitably involve a buffer and barrier being provided along the southern boundary of the site.

In order to ensure that sufficient funds will be available to provide meaningful additions to the range of social and community facilities we accept that development in the order of 800 dwellings will be necessary to provide 'critical mass'. Therefore, in conjunction with SHLAA site 41 we would suggest that SHLAA site 187 should also be considered. We suggest this largely because it adjoins site 41, but also because the respective landowners are working together to present a joint proposal. Also, development south of the village will involve the loss of less agricultural land and will help to maintain a more substantial open green gap between Hersden and Westbere.

We also consider that in recognition of the improved range of services that would be provided at Hersden, and if following further consultation with the local community there is support for expansion, then Hersden should be included in the rural settlement hierarchy as a rural service centre. We believe that this would better reflect its standing.

**Conclusion:** CPRE Protect Kent accept in principle planned expansion at Hersden of around the scale proposed (i.e. 800 dwellings) provided there is clear evidence that this is supported by the local community. However, we object to the strategic allocation proposed north of the village. Instead we would favour development of land south of the village on SHLAA sites 41 & 187. We also consider that the village should be elevated in the settlement hierarchy to a 'rural service centre'.

- ix) Simon Langton Girls School, Canterbury (Policy HD1): CPRE Protect Kent understands that the school no longer is looking to relocate as proposed in the consultation draft, and therefore the site is no longer available for redevelopment. Therefore, the site should be **deleted** for the list in paragraph 2.24 and Appendix 2.
- x) St Martin's Hospital, Canterbury (Policy HD1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed, subject to support from the local community.
- xi) Kingsmead Field, Canterbury (Policy HD1): CPRE Protect Kent **objects** to the allocation of this site for development. Kingsmead Field has been used as a playing field and recreational area for over 60 years (1950 to the present day), but under Policy HD1 it is allocated for residential development (for 100 dwellings as indicated in paragraph 2.24 of the consultation draft). For the following reasons we believe that the proposed development of the site conflicts with other objectives of the Plan and that it is an inappropriate location for development:
- **Importance of protecting flood plains:** Paragraph 7.28 of the consultation draft states that: *'The City Council's approach to new development is to ensure that it in no way does new development make the flooding situation worse.'* We consider that building on an area of open land as large as Kingsmead Field will decrease the area's absorption capacity after heavy rainfall and lead to an increased risk of flooding further downstream.

Policy CC5 of the draft Local Plan states that: *‘On sites that have not been previously developed with the Environment Agency’s Zone 2 and 3, no development will be permitted unless an exceptional justification can be demonstrated.’*

Kingsmead Field is within the Environment Agency Area at Risk of Flooding Zone 2 (see Inset 1 of the Proposals Map). Under the definition in the NPPF, Kingsmead Field is not previously developed land, and no exceptional justification has been put forward to demonstrate why it should be developed.

- **Importance of open space for disadvantaged communities:** Paragraph 11.4 of the consultation draft explains that open space is valuable for a number of reasons, including that it *‘engenders social inclusion’*; *‘improves health and well-being’* and *‘provides a focus for community regeneration and urban renaissance – a catalyst to improve disadvantaged environments.’* Kingsmead Field is located in Northgate which is the most deprived ward in the district and one of the most disadvantaged wards in the County, with the joint highest level of child poverty in Kent (44%).<sup>12</sup> The highest level of child poverty nationally is 51% in Tower Hamlets (only 7% above the figure for Northgate) and the average level for Canterbury is 17% (27% below Northgate). All of the functions which open space fulfil, as listed in paragraph 11.4 of the consultation draft, are particularly important for an area with serious levels of deprivation, such as Northgate.
- **Importance of open space for ecosystem services:** Paragraph 11.4 of the consultation draft also highlights the importance of open space for ecosystem services such as: *‘biodiversity habitat, surface water drainage and cleaner air’*. Kingsmead Field provides all of these ecosystem services in a densely developed area of the city. Its location next to the smaller branch of the river Stour (a designated Green Corridor) makes it of particular importance where the protection of biodiversity is concerned. It provides a habitat for at least two protected species of animal.
- **Strategic location of Kingsmead Field:** Paragraph 11.5 of the consultation draft states that: *‘The Council’s objective is to improve the distribution, accessibility, quality and connectivity of open space’*. From the perspective of the distribution, accessibility and connectivity of open space, Kingsmead Field is in a highly strategic location. There are three significant areas of public open space in Northgate: two on the eastern fringe of the ward (namely the Sturry Road Community Garden and Vauxhall Avenue play area) and one in the west of the ward: Kingsmead Field. The loss of Kingsmead Field would lead to a serious imbalance in the open space distribution in Northgate. The Council’s assertion that the loss of Kingsmead Field would be recompensed by open space in the neighbouring development of Kingsbrook Park is fundamentally flawed as it does not compare like with like. The provision of a ‘pocket park’ as part of any potential residential development on Kingsmead Field might help to serve the open space requirements of new residents, but will do nothing to compensate existing residents in the local area for the loss of the field.

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<sup>12</sup> Report by the Campaign to End Child Poverty, January 2012 – see:  
<http://www.endchildpoverty.org.uk/files/childpovertymap2011.pdf>

- **Incompatibility with the Corporate Plan:** Pledge 5 of the Council’s Corporate Plan, as highlighted in paragraph 11.8 of the consultation draft, promises that the district will become a ‘*Cleaner and greener place leading on environmental issues*’. Pledge 9 promises ‘*Greater involvement for local people*’. We believe that the removal of an existing area of green open space within the city, against the expressed wishes of the local population, is in direct contravention of these pledges.
  
- **Incompatibility with the Council’s commitment to protect existing open space, especially within the urban boundaries:** The consultation draft makes a number of references to the need to protect and enhance existing areas of open space, for example as follows:
  - Paragraph 11.10 - ‘*This local plan aims to protect and enhance the existing open space and green infrastructure network to ensure that there is a range of environmental and recreational assets that meet the needs of communities, natural habitats and species and contribute towards the development of sustainable living environments.*’
  
  - Paragraph 11.18 - ‘*The Council will protect existing open space in the district, and improve the quality of this open space...*’
  
  - Paragraph 11.58 - Highlights the ‘*overall deficiency in open space in the District*’ and emphasises that ‘***the Council is especially determined to prevent the loss of existing open space within the urban boundaries, whether publicly or privately owned, by reason of its contribution towards recreational or visual amenity***’.
  
  - Paragraph 11.59 – ‘*The loss of open spaces could lead to **town cramming** and be detrimental to the character of the built environment, undermining quality of life and the progress towards urban renaissance.*’
  
  - Policy OS8 - ‘***Development which would involve the loss of open spaces and play areas within residential area which contribute to the visual or recreational amenity of the area will be refused***’.

For over 60 years, Kingsmead Field has provided a valuable recreational area for the surrounding community. Given the comments made in the consultation draft about the importance of existing open space and the need to protect it, and the commitment made in Policy OS8 to refuse development of open space within residential areas, Kingsmead Field should not be allocated for development.

- **Incompatibility with the National Planning Policy Framework:** Paragraph 11.15 of the consultation draft highlights that the National Planning Policy Framework (NPPF) states that existing open space should not be built on unless an assessment has been undertaken which clearly shows that the open space is surplus to requirements; or that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision. Despite this, the

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Council made its decision to dispose of Kingsmead Field without undertaking any assessment of its usage. The assessment it finally did undertake (August 2012) was lacking in impartiality. Furthermore, the Council has provided no evidence to demonstrate that the loss of Kingsmead Field would be recompensed by equivalent or better provision elsewhere.

- **Gaps in Provision:** Paragraph 11.24 of the consultation draft identifies a gap in provision for outdoor sports pitches in Canterbury (1 adult, 4 junior/mini football and 1 rugby). Given Kingsmead's long history as the home of Canterbury City Football Club, it would be highly appropriate for Kingsmead Field to provide the location for at least 1 mini football pitch. This would create historic continuity and restore a sense of place.
- **Importance of Playing Fields:** Policy OS1 of the consultation draft outlines the conditions under which development on a playing field would be permitted. None of these conditions are fulfilled where Kingsmead Field is concerned. It should be noted that there is an alternative location for development on two neighbouring brownfield sites (the Old Coach Park and Serco Depot). Under the Kingsmead Development Brief (2004), these sites are designated for mixed use, including residential development. The houses allocated for Kingsmead Field could be re-assigned to one of these two sites.
- **Local Green Space Designation:** The NPPF provides communities with the option of identifying land as 'Local Green Space' (as explained on paragraph 11.16 of the consultation draft) where the following conditions are met:
  - Where the green space is in reasonably close proximity to the community it serves;
  - Where the green space is demonstrably special to a local community and holds a particular local significance, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
  - Where the green area concerned is local in character and is not an extensive tract of land.

Kingsmead Field fulfils all of these conditions. CPRE Protect Kent consider that it would be far more appropriate for the field to be designated as a Local Green Space than allocated for house-building. Kingsmead Field is simply the wrong place for residential development.

**Conclusion:** For the above reasons CPRE Protect Kent object to the proposed allocation of Kingsmead Field, and the reference to the construction of 100 houses in paragraph 2.24 of the draft Local Plan should be deleted. Instead we ask that the site is identified in the Local Plan as a Local Green Space in accordance with paragraphs 76 and 77 of the NPPF.

- xii) Land at Bullockstone Road, Herne Bay (Policy HD1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed, subject to support from the local community.

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- xiii) Land at Spires, Bredlands, Hersden (Policy HD1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed, subject to support from the local community. It should also be seen in the context of the proposed expansion of the village under Policy SP3h, and should thus be included in any master plan prepared for the village.
- xiv) Barham Court Farm (Policy HD1): Under Policy HD1, and as indicated in paragraph 2.24 of the consultation draft, this site is allocated for 25 dwellings. No details are provided in the consultation draft as to the basis of the allocation so we have assumed that it is for market housing, though subject to the general requirement for affordable housing as included in Policy HD2, i.e. 30%.

As we have explained in our comments in part b) of this response, we do not consider that the needs of the rural communities have been addressed in the spatial strategy advocated in the consultation draft. However, whilst we consider that there are opportunities for development in the rural communities we **object** to the allocation of this site for the following reasons:

- There has been no engagement with the local community and the site should only be allocated in the plan if the local community support it. This proposal is not so supported;
- The site is located in a Conservation Area and involves the re-use of a listed building. We believe that the development of the site for 25 dwellings will have a profound effect on the character of the Conservation Area and the setting of the listed building, contrary to policies HE4 and HE6 of the consultation draft. The SA shows that the proposal will have a major negative impact in this regard (Objective 5); and
- The SHLAA assessment of sites concluded that the site should not be allocated.

CPRE Protect Kent, and we believe the local community, would not rule out any development on this site but it would need to a greatly reduced number that respected the Conservation Area and listed building. This should be discussed with the Parish Council and the local community.

- xv) Innovation Centre, University of Kent (Policy EMP1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xvi) Broad Oak Road/Vauxhall Road, Canterbury (Policy EMP1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed, but we are concerned about the impact of traffic arising from the site and feel that this should be specifically highlighted in the Plan as an issue to be addressed.
- xvii) Canterbury West Station (Policy EMP1): CPRE Protect Kent **objects** to the allocation of this site for development. In the absence of replacement provision being made we find it regrettable that car parking at the station will be lost. We also consider that the development of the site will add to the congestion already experienced in this location.
- xviii) Office Connection site, St Andrew's Close, Canterbury (Policy EMP1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed.

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- xix) Eddington Lane (various), Herne Bay (Policy EMP1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xx) Altira Park, Herne Bay (Policy EMP1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xxi) Metric Site, Herne Bay (Policy EMP1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xxii) Land at Wraik Hill, Whitstable (Policy EMP1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xxiii) Canterbury Business Park (Highland Court) (Policy EMP1): CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xxiv) Wincheap Retail Area (Policies TCL7 & HD1): CPRE Protect Kent **objects** to the allocation of this site for development as proposed. Whilst we accept in principle that the site provides the opportunity for retail and leisure development as described in Policy TCL7 and its supporting text, we believe that it is inevitable that residential development will provide part of the mix of development that ultimately comes forward. Indeed, at paragraph 4.46 of the consultation draft it is stated that the Council will ‘encourage a residential element’ to the development. This is a site that was previously proposed for significant residential development and provides a good sustainable location for such development, especially if it is linked to retail and leisure development. Therefore, we believe that Policy TCL7 should specifically require an element of residential development as a contribution towards the overall housing target, and that the Policy should state that this will be a minimum of 200 units.
- xxv) White Horse Lane, Canterbury (Policies TCL10 & HD1): As a site carried forward from the existing Local Plan, CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xxvi) Roger Britton Carpets, Wincheap, Canterbury (Policies TCL10 & HD1): As a site carried forward from the existing Local Plan, CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xxvii) Kingsmead, Canterbury (Policies TCL10 & HD1): This site, which comprises the Kingsmead Serco Depot / Old Coach Park, is carried forward from the existing Local Plan. As such, CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xxviii) Peugeot Garage, Canterbury (Policies TCL10): CPRE Protect Kent **objects** to the allocation of this site for the uses proposed. We consider that this centrally located mixed-use site should also include an element of residential development. Therefore, we believe that the proposal should additionally include residential development and that this should be specifically stated as circa 50 units. We also consider that this important site should be subject to its own Policy rather than being part of Policy TCL10. We feel that this is appropriate given that the site, unlike most of the others included in Policy TCL10, is a new allocation rather than an existing allocation. It will also enable supporting text to

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be provided to highlight issues relating to the site, for example the need to ensure that the Victorian School on the site should be retained.

- xxix) Herne Bay Central Development Area (Policies TCL10 & HD1): CPRE Protect Kent understands that this is the same site that is already allocated under Policy HB1 of the Herne Bay Area Action Plan, 2010. Consequently we fail to see the need to re-allocate the site in Policy TCL10 and under Policy HD1. It would be more sensible to keep the whole of the AAP intact. The site should be **deleted** from Policy TCL10.
- xxx) Beach Street, Herne Bay (Policies TCL10 & HD1): CPRE Protect Kent understands that this is the same site that is already allocated under Policy HB2 of the Herne Bay Area Action Plan, 2010. Consequently we fail to see the need to re-allocate the site in Policy TCL10 and under Policy HD1. It would be more sensible to keep the whole of the AAP intact. The site should be **deleted** from Policy TCL10.
- xxxi) Bus depot, Herne Bay (Policies TCL10 & HD1): CPRE Protect Kent understands that this is the same site that is already allocated under Policy HB3 of the Herne Bay Area Action Plan, 2010. Consequently we fail to see the need to re-allocate the site in Policy TCL10 and under Policy HD1. It would be more sensible to keep the whole of the AAP intact. The site should be **deleted** from Policy TCL10.
- xxxii) The Warehouse, Sea Street, Whitstable (Policies TCL10 & HD1): As a site carried forward from the existing Local Plan, CPRE Protect Kent **accepts** the allocation of this site for development as proposed.
- xxxiii) Whitstable Harbour (Policies TCL10 & HD1): CPRE Protect Kent **accept** that the range of uses indicated are the most suitable for the Whitstable Harbour area. We note, however, that Policy EMP11 also relates to the Whitstable Harbour area. We consider that it would be better to deal with the future of the Harbour in a single Policy to avoid potential confusion, and we would suggest that Policy EMP11 would be the appropriate Policy for this. Therefore, the content of Policy TCL10 in relation to the Harbour should be incorporated into Policy EMP11, and the supporting text expanded as appropriate.

d) CPRE Protect Kent's Alternative Approach

As explained in section a) of this response, we consider that a strategy for the Plan that would see development in the 'lower mid-range' as defined in the NLP report would be the most realistic and deliverable strategy. This would see housing development in the range of 500-650 dwellings per year. We consider that a target of around 600 dwellings per year (around 12,000 in total), roughly equating to Scenario B, should be pursued. This is a level of development that will see growth in housing provision above that achieved over the last 20 years, but recognising that the recession will continue to depress provision for the foreseeable future (so some phasing would be essential). It is also a level of development that will deliver economic growth, as confirmed by the NLP report, in the order of 2,500-3,500 new jobs over the Plan period. Importantly, this lower level of new housing and employment provision will be balanced by less environmental impact, meaning overall that this would better accord with the principles of

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sustainable development – i.e. the integration of economic, social and environmental considerations, as required by paragraphs 6 to 9 of the NPPF.

We support the application of the sequential approach in allocating sites, with development focussed at the Greater Canterbury, Herne Bay and Whitstable HMAs (with priority given to previously developed land), but we believe that there should be some development in the rural HMAs to help meet the needs of the rural communities. Consequently, housing and employment targets should be presented to reflect the objectively assessed needs for the respective HMAs and allocations presented to meet the targets. CPRE Protect Kent does not have the information to disaggregate the district-wide targets on this basis, but we assume that the City Council will have this information readily to hand for each of the scenarios presented in the NLP study.

In the rural areas proposed allocations should accord with the rural settlement hierarchy set out in the consultation draft (though we have some detailed comments on this which we present in Part 2 of this response). Importantly, we consider it essential that in determining potential development in the rural HMAs the City Council engages with the local communities to discuss opportunities and potential benefits.

In meeting a housing target of circa 12,000 dwellings, we consider that the following land supply sources would contribute (following the format of the table presented in paragraph 2.27 of the consultation draft):

<u>Housing Land Supply Component</u>	<u>No. of units</u>	<u>Residual requirement</u>
Strategic requirement 2011-2031	12,000	12,000
Over supply 2006-11 (see note 1 below)	1,003	10,997
NPPF 5% buffer (note 2)	0	10,997
Completions 2011/12 (note 3)	624	10,373
Existing allocations (revised) (note 4)	997	9,376
Existing sites with planning permission (note 5)	1,226	8,150
Small site windfall contribution (158 dpa x 19) (note 6)	3,002	5,148
Larger site windfall contribution (79 dpa x 19) (note 7)	1,501	3,647
Allocations made in the consultation draft (note 8)	3,346	301
Other allocations to be made (note 9)	At least 301	0

Note 1: Figure as given in the consultation draft.

Note 2: In the table in paragraph 2.27 of the consultation draft the City Council has added a '5% buffer' (195 units) on to the target, but it is wrong to do this. According to the NPPF (paragraph 47) the 'buffer' comes from within the target by phasing units earlier. In the first instance the buffer is for the first five years of the plan, so the Council should not be adding the buffer to the end of the plan period by, in effect, increasing the target overall. Therefore, this should be zero and excluded from the table.

Note 3: Figure as given in the consultation draft.

Note 4: Figure as given in the consultation draft.

Note 5: Figure as given in the consultation draft.

Note 6: In the table in paragraph 2.27 of the consultation draft the City Council, informed by the SHLAA, makes an allowance of 116 dwellings per year from this source<sup>13</sup>. This is based on the average over the last 20 years. However, over the last five years the SHLAA shows that the annual average is 158 dwellings per year<sup>14</sup>. We consider that the figure for this more recent time period is a more sensible and robust one to take as it reflects what has happened in the context of current planning policy and in the context of the recession.

Note 7: The City Council makes no allowance for a contribution from large windfalls despite the fact that over the last 20 years they have contributed 2,971 dwellings – 26% of all completions over this period (986 over the last 5 years – 28%)<sup>15</sup>. The SHLAA, however, dismisses this source for the future by simply saying that it would be unlikely to occur again. We disagree with that statement and believe that it is highly likely that such sites will continue to come forward during the plan period, as they have in the past. At the very least there are the 'opportunity sites' referred to in the consultation draft that are not specifically allocated but which are likely to come forward during the Plan period (e.g. the Howe Barracks and the council offices and adjoining land – see paragraph 2.25 of the consultation draft). There are also other potential large windfall sites, e.g. the prison (now closed), which are likely to come forward for redevelopment, as well as sites identified in the SHLAA where it is specifically concluded that they could come forward as windfalls.

However, we accept that large windfalls are a less reliable and predictable source than small windfalls and that this needs to be reflected in the allowance made. Therefore we would not suggest that an allowance of 197 dwellings per year be made, which the SHLAA shows was the annual average achieved over the last five years, but that a discounted rate be applied. Consequently, we suggest that this rate be discounted by 60% which would give an allowance of 79 dwellings per year. We believe that this discounted target is realistic and deliverable, and reflects the potential opportunities referred to in the consultation draft as well as other sites that will inevitably come forward.

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<sup>13</sup> See paragraph 4.3.11 in the Strategic Housing Land Availability Assessment (SHLAA) – Summary of Methodology and Assessment of Sites, June 2013

<sup>14</sup> See Table 2 in the Strategic Housing Land Availability Assessment (SHLAA) – Summary of Methodology and Assessment of Sites, June 2013

<sup>15</sup> As above

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**Note 8:** Reflecting our comments on the proposed sites in section c) of this response, we consider that the following proposed allocations might be acceptable:

Site	No. of Units
South Canterbury – SHLAA site 86	300
Hillborough Site, Herne Bay (part only)	300
Herne Bay Golf Course + SHLAA sites 12 & 199	475
Land at Greenhill, Herne Bay	300
Thanet Way site, Whitstable	400
Hersden - SHLAA sites 41 & 187	800
St Martin’s Hospital, Canterbury	200
Land at Bullockstone Road, Herne Bay	190
Land at Spires, Bredlands, Hersden	131
Wincheap Retail Area	200
Peugeot Garage site	50
<b>Total</b>	<b>3,346</b>

**Note 9:** It will be necessary to identify further opportunities to accommodate at least 301 units. In particular we consider that these opportunities should be targeted towards Whitstable and the rural HMAs, and they should be small-scale in nature. However, previously developed land in Canterbury and Herne Bay should be used in preference to greenfield land elsewhere. Having assessed the SHLAA sites for these areas we consider that sufficient opportunities exist to accommodate this level of development, including on previously developed land. These opportunities will help to address some of the housing needs in the rural communities that are not addressed by other allocations and existing planning permissions, and will widen choice. Importantly, though, any opportunities in the rural areas should be subject to discussion with the Parish Councils and the local communities so that a consensus on the way forward can be achieved. We would welcome the opportunity to work with the City Council and to share our thoughts on the potential opportunities.

With regard to employment, we consider that the sites proposed under Policy EMP1, together with new commercial floorspace at the Herne Bay Golf Course site, the Wincheap retail area and the other proposed mixed use sites in Policy TCL10, will provide a wide range of new opportunities for job creation during the Plan period. These new opportunities, together with robust protection of existing employment sites as proposed under Policy EMP4 (though see our detailed comments on this Policy in Part 2 of our response), will help to ensure that Canterbury District remains ‘open for business’.

Our proposed alternative strategy is clearly different to that being favoured by the City Council, both in terms of scale of development and the way in which new development would be delivered. Consequently, we consider that it would be incumbent on the City Council to reconsult on a revised draft plan before finalising the Plan. In particular it will be essential to engage with local communities on potential development opportunities, which would accord with the true spirit of localism.

**Part 2: Other Comments**

In this second part of our response we will present our other comments on the Plan in addition to those that we have presented on the Plan strategy, which we present in Part 1. Unless we indicate otherwise, it can be taken the paragraph or Policy is acceptable to us as it stands.

<u>Policy/Para</u>	<u>Comment</u>
<b><u>Local Plan Foreword</u></b>	
Why have a local Plan?	<p>Add two further bullet points as follows:</p> <p>"Comply with the provisions of the Localism Act and the NPPF"</p> <p>"To represent and defend the City against loss of character, distinctiveness, and adverse effects upon its historic and cultural uniqueness as the Head of the Anglican Church in Britain, the seat of the English Language and Legal System and its large World Heritage Site, Ancient Monuments, Listed Buildings Conservation Areas and Historic Setting. The Council is concerned that intensive development in and around the City already has caused, and would continue to cause, adverse effects upon the items listed above, and will refuse applications for development that would cause such effects."</p>
What are we trying to achieve?	<p>Add an additional point: "Recognise mistakes made during the existing Local Plan period and aim not to duplicate them"</p> <p>Second point - delete "is" and replace with "are", and after "enough" add "jobs and"</p> <p>Third point - after "protect" insert "and enhance". Add at end "and High Value Landscape areas, and Natural Wildlife areas."</p> <p>Fourth point - Alter to read "Ensure that infrastructure such as transport, schools, health facilities and so on is available for the increase in population that development will bring"</p> <p>Sixth point - alter to read "Support the educational core policies of the Universities and Colleges, but discourage the use of their sites for non-educational/commercial purposes"</p> <p>Seventh point - Alter to read "Improve existing cultural and leisure facilities, and provide enough informal and also amenity open spaces to foster good health and social well-being"</p> <p>Amend the second sentence of the penultimate paragraph on page 3 to read: "Public opinion research suggests that numbers of local people believe some new housing may be needed (with an emphasis on affordable housing), and that business development and the provision of employment is needed, but they are also concerned about transport issues, air pollution, loss of greenfield land, increased cost of imported foods and the proposed use of productive agricultural land for non-agricultural uses. They are further concerned at the shortage of urban open space, over-intensive housing in urban areas, and pressures upon existing local services and facilities. The Council is keen to produce a plan supporting the community's needs and wishes and alleviating its concerns, and now wishes to consult on the following proposals"</p>

<b>Chapter 1: Strategy</b>	
Vision and Strategy	<p>Add the following to the end of the vision:</p> <p>“, but we will ensure that our rural and historic environments are protected and that our valuable agricultural land is retained in productive use, and we will ensure that we continue to have viable and thriving local communities.”</p>
Plan objectives	<p>First objective - add: "by means other than encouraging increased housing provision".</p> <p>Second objective - delete the words "and support economic growth" and add at the end "with the emphasis on affordable housing".</p> <p>Third objective should be re-worded: "To protect, enhance and improve the built and natural environment".</p> <p>Add a fifth objective: "To foster social well-being with the provision of adequate informal and amenity open spaces, especially in urban areas."</p>
Para 1.5	<p>Delete "more sustained effort" and "high paid jobs" in second sentence and add at end "The Vision recognises that small or locally based businesses are more likely to enhance visitor experience as well as providing more choice for both residents and visitors."</p>
Para 1.6	<p>Delete "necessary" and substitute "any", and after "development" insert "deemed necessary" in first sentence.</p> <p>Add to first point "particularly small local businesses"</p> <p>After "life" in third point re-word to read "and social well-being whilst retaining, enhancing and protecting our heritage, natural assets, character and distinctiveness"</p>
Para 1.9	<p>After "(NPPF)" in second sentence insert "and Localism Act"</p> <p>In third sentence alter "preferred scenarios" to read "stakeholders outcomes". Also replace "for foster" with "to ensure"</p>
Para 1.10	<p>In second sentence after "of" insert "a few"</p> <p>In last sentence after "Study" insert "(both obtained by pre-set questions but not by public debate)"</p>
Para 1.14	<p>In last sentence delete "would likely need to virtually no" and substitute "might not provide a"</p>
Para 1.19	<p>After first sentence insert a new sentence "There is local concern that further expansion of Canterbury would have adverse effects upon the City's cultural, historic and architectural heritage, hence reducing its attraction to visitors both national and international, and risking a downturn in finance from those sources. Local residents believe that Canterbury should be accepted as being 'full up'."</p>

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<p>Para 1.35</p>	<p>Fourth point - alter beginning of second sentence to read "Reducing the amount of off-campus".....</p> <p>Fifth point - delete "Seeking to" and alter "ensure" to "ensuring"</p> <p>Sixth point - after "occupation" re-word to read ", empty homes and HMO houses; and"</p>
<p>Para 1.37</p>	<p>In point iv add at end "particularly those locally based"</p>
<p>Para 1.39</p>	<p>We fail to see how it is possible to prepare a local plan when the transport strategy that underpins it has not been finalised. This is an important part of the evidence base that should inform the strategy of the plan.</p> <p>The second sentence of the paragraph should be re-worded as follows:</p> <p><i>"The emerging priorities of the strategy are to reduce traffic pollution; promote sustainable modes of transport; refuse development that would increase traffic pollution; achieve reliable vehicle journey times; consider and publicise dangers to public health from traffic pollution; and to endeavour to improve access to services."</i></p>
<p>Para 1.40</p>	<p>Congestion &amp; delays: it is unclear if this refers just to road traffic, but that should be stated. In our view the best way to achieve reduced congestion and more reliable journey times is to reduce the need to travel, with the second best being reduce the need to travel by road, so that should be highlighted. Reducing the need travel can be achieved by optimising locations of housing, open space, employment, schools, shops, etc. Mere 'rebalancing' will be insufficient to achieve the best result and would have greater impacts.</p> <p>It should also be recognised that that delay is not the only consequence of congestion, as it will also affect air quality and public health. We would suggest that after "<i>Congestion</i>" insert "<i>air quality, danger to public health</i>". It should also be recognised that it is not just travellers that are affected, but also residents, so before "<i>travellers</i>" insert "<i>residents and</i>"</p> <p>As we explain later in this response, we strongly disagree with the promotion of more park &amp; ride, because that increases overall vehicle miles, and hence leads to increased emissions, as well as being sub-optimal use of space.</p>
<p>Para 1.41</p>	<p>In first point:</p> <ul style="list-style-type: none"> <li>• replace "<i>near</i>" with "<i>by</i>"</li> <li>• insert "<i>public</i>" after "<i>existing</i>"</li> <li>• delete "<i>hubs</i>" and insert "<i>routes</i>"</li> </ul> <p>Add a fourth point "<i>requiring low polluting buses in towns and the City</i>"</p> <p>Add a fifth point "<i>Physically separating cycle routes from vehicular traffic in urban areas</i>"</p>

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<p>Paras 1.42-1.44</p>	<p>As for the transport strategy, the up-dated environment strategy should have been finalised before the consultation draft of the local plan was prepared as it should inform the local plan as part of the evidence base.</p> <p>In paragraph 1.42 after "climate change" insert the following: <i>"The Council acknowledges that insufficient emphasis on this Strategy has been placed in connection with large scale planning applications, and will require all such applications in future to demonstrate that development will not be in breach of the Strategy, nor of any review of it, nor of any Environment Policy/Strategy or review of that. The Council also recognises that air quality is a major problem in urban areas and that development adds to it. The council will protect the health of its residents by refusing applications in Canterbury for residential development in excess of 10 units."</i></p>
<p>Para 1.45</p>	<p>As for the transport strategy, the up-dated open space strategy should have been finalised before the consultation draft of the local plan was prepared as it should inform the local plan as part of the evidence base.</p> <p>In the first sentence, after "enhance" add "and provide"</p>
<p>Para 1.46</p>	<p>After "life" add ", social well-being and health"</p>
<p>Para 1.47</p>	<p>At the end add "social well-being and health"</p>
<p>Para 1.48</p>	<p>After "life" add "social well-being and health"</p>
<p>Para 1.49</p>	<p>After the three bullet points add the following sentence: <i>"However, a balance has to be struck between delivery and any adverse effects on existing open space, countryside and productive agricultural land."</i></p>
<p>Para 1.50 – 1.53</p>	<p>These paragraphs should be deleted as it is unnecessary to have a local definition of sustainable development, in addition to that included in the NPPF. To do so will only result in confusion and potential conflict with the NPPF. For example, the proposed local definition provides a much narrower definition of the environmental role by seeking only to protect designated areas. This is clearly in conflict with the NPPF definition, which sees the environmental role more generally. CPRE Protect Kent strongly objects to this attempt to water down the definition, which is used in the plan to sanction significant greenfield development.</p>
<p>Policy SP1</p>	<p>CPRE Protect Kent <b>object</b> to the inclusion of this Policy in the Plan, as we consider it is neither appropriate or necessary for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Paragraph 14 of the NPPF explains that the presumption in favour of sustainable development is at the heart of the NPPF and that it is the 'golden thread' running through both plan-making and decision-taking. It is clear from the NPPF that the presumption in favour of sustainable development is not to be achieved simply by compliance with a single local plan policy. Compliance is a matter for the plan as a whole. Given that it is one of the tasks of the Inspector examining the plan to consider whether or not the plan is consistent with national policy, specifically to ensure that the plan enables <i>"the delivery of sustainable development in accordance with policies in the framework"</i> (paragraph 182 of the NPPF), we find it difficult to see the need for a specific policy on the presumption. If the plan taken as a whole fails to accord with the NPPF - especially the 'golden thread' running through it - the Inspector will find it unsound or will recommend that modifications are made to it. Simply by putting into the plan a policy on the presumption does not make it compliant with the NPPF if the policies and proposals in the plan are not so compliant.</li> </ol>

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	<p>2. We are very concerned that this Policy is in effect being imposed on the City Council with the prospect that the plan will not be sound without it. We believe that this is contrary to the principle of ‘localism’ and conflicts with the notion that local plans are <u>local</u> plans. We are very surprised that in the wake of the Localism Act, the purpose of which is to devolve more decision making to the local level, that such a top-down approach to plan making is being taken.</p> <p>3. It is of concern to us that the Policy simply seeks to restate the presumption as included in the NPPF. It has been longstanding practice in plan making, in order to help ensure that plans are as succinct as possible and locally distinctive, that national policy is not repeated in plans. This is exactly what this policy does, with parts of it simply quoting sections of the NPPF.</p> <p>4. It is of particular concern to us that the inclusion of the Policy, which seeks to ensure that development is approved wherever possible, does not include all the detailed aspects of sustainable development as set out in the NPPF. Consequently, it undermines the proper role of the local development plan in setting out policies that seeks to deliver sustainable development in an integrated and balanced way.</p> <p>For these reasons we do not consider that the Policy is needed or appropriate and it should not be included in the plan.</p>
<p>Paras 1.54 &amp; 1.55 and Policy SP2</p>	<p>CPRE Protect Kent <b>object</b> to the scale of new development proposed, as we explain in detail in Part 1 of our response.</p>
<p>Paras 1.56 &amp; 1.57 and policies SP3a-h</p>	<p>CPRE Protect Kent <b>objects</b> to the strategic allocations made under policies SP3a, b, c, d, e and h for the reasons we explain in detail in Part 1 of our response.</p> <p>Notwithstanding the above, we find that the policy guidance on the proposed sites is lacking. In particular we consider that more supporting text is required to explain what is actually proposed for each site and how they will actually be developed. This should then be reflected in the individual policies themselves. As it stands, the reader is left very unclear about what considerations will be taken into account at each site and how it is envisaged the sites will progress.</p>
<p>Policy SP3i</p>	<p>Notwithstanding our comments on the strategic sites, CPRE Protect Kent generally supports this Policy, which seeks to provide guidance on how the strategic sites will progress. In particular we agree that each site should progress in accordance with an agreed master plan which will need to be subject to full public consultation.</p> <p>We are concerned that the reference to ‘garden city’ principles is open to interpretation, as none of the strategic sites comprise new freestanding settlements, as envisaged by the Garden City movement. It seems to us, that this terminology suggests that the developments will have exceptional green credentials, when the reality will be, because of the infrastructure burdens that will be [paced upon them, they are likely to be pretty standard suburban type developments. To suggest that will be something better is misleading. If such principles are to be employed they need to be properly defined in the supporting text to the policy so that the success, or otherwise, of this policy can be measured against what actually happens on the ground.</p>

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<p>Paras 1.58-1.61</p>	<p>These paragraphs deal with potential scope for development on the southern side of Hersden. Please see our comments on development at Hersden included in Part 1 of our response. If our view is accepted that this lands is developed in preference to that proposed in Policy SP3h on the northern side of the villager, these paragraphs will need to be deleted.</p>
<p>Para 1.66</p>	<p>The second bullet point suggests that in the longer term there is potential for an eastern by-pass from the A2 to the A28 serving the A257 in between. CPRE Protect Kent <b>object</b> to this possibility being signposted in the Plan and shown as a safeguarded route on the Proposals Map. Both the text and the designation on the Proposals map should be deleted.</p> <p>“Unlocking The Gridlock”, published by Canterbury City Council in 2004, said that “<i>..an outer by pass perhaps linking an improved A2 junction at Bridge with the A2 near Sturry, could not be justified as the proportion of through traffic is relatively low</i>”. The Canterbury District Local Plan First Review of July 2006 stated that an Eastern by-pass “<i>would also have significantly damaging effects on the local environment and landscape</i>”. As recently as 2010 KCC were still saying that such a road would remove only 10% of the through traffic from the City, as most of it had a destination there and so would not be justified. As late as early 2013 the City Council was still asserting that an eastern By Pass was not a project that was being considered – this was included in the Council’s response to an objection to a planning application for housing at the Telecom site in Littlebourne Road. We find it surprising, therefore, to see that it is proposed to safeguard a route for the eastern By-Pass in the Local Plan. This is entirely aspirational, and no details whatsoever are provided to justify the proposal. We are particularly concerned that the road is shown as passing through an SSSI, which is entirely unacceptable.</p>
<p>Paras 1.67–1.72</p>	<p>CPRE Protect Kent <b>generally supports</b> the rural settlement hierarchy as proposed, but consider that the following changes should be made:</p> <ul style="list-style-type: none"> <li>• The category of rural service centre should be removed from the hierarchy, and Sturry (the only settlement defined as falling in this category) should be re-designated in the hierarchy as a local centre. This, we believe, would better reflect its function as a centre given its close proximity to Canterbury.</li> <li>• The village of Herne should be recognised in the hierarchy as a separate settlement to Herne Bay. It should be included as a local centre.</li> <li>• As it only has a pub, it is difficult to see why Tyler Hill is defined as a village – it should be included in the hierarchy as a hamlet.</li> </ul> <p>Para 1.72: CPRE Protect Kent do not see why rural settlements cannot have their built confines defined, even if there are open spaces within those confines. Whether or not a boundary is defined, a judgement will have to be made in the context of general policies if a planning application is submitted for any such open spaces. However, the benefit of having a defined boundary is that it distinguishes between what is ‘built’ and what is ‘countryside’ in the application of Policy SP4, rather than leaving this to some arbitrary, and potentially inconsistent, decisions made through the development management process. Therefore, CPRE Protect Kent is strongly of the view that boundaries should be defined for the villages, local centres and rural service centres, as well as for the main urban areas.</p>

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Policy SP4	<p>CPRE Protect Kent <b>generally support</b> this Policy, but:</p> <ul style="list-style-type: none"> <li>• In the final sentence of the opening paragraph insert “<i>and designs</i>” after “<i>types</i>”;</li> <li>• In the open paragraph reference is made to “<i>some of the rural service centres</i>”, but in the hierarchy (para 1.70) only one rural service centre is defined. The Policy needs to be amended accordingly. Irrespective of this, we consider that the category of rural service centre should be removed from the hierarchy, and Sturry (the only settlement defined as falling in this category) should be re-designated in the hierarchy as a local centre. This, we believe, would better reflect its function as a centre given its close proximity to Canterbury; and</li> <li>• In point 5 the word ‘<i>normally</i>’ should be removed. .</li> </ul>
Para 1.73	<p>We fail to see how it is possible to prepare a local plan when the transport strategy that underpins it has not been finalised. This is an important part of the evidence base that should inform the strategy of the plan.</p>
Policy SP5	<p>CPRE Protect Kent <b>generally support</b> this Policy, but would wish to see point f. amended to read as follows:</p> <p><i>“ensuring that necessary up-grades to the road infrastructure is provided to meet the needs of new development and to improve environmental conditions.”</i></p> <p>In point b. after ‘<i>public</i>’ insert ‘<i>non-polluting</i>’.</p>
Para 1.75	<p>Whilst we accept the point made here, it will also be necessary for the Plan to ensure that existing shortfalls in open space are also provided; it is not just the needs arising from new development that need to be addressed.</p>
Para 1.77	<p>It should be acknowledged that the countryside as a whole is an important (if not the main) component of green infrastructure – not just the ‘<i>accessible countryside in urban fringe areas</i>’.</p>
Para 1.78	<p>In the first bullet point delete the word ‘<i>valuable</i>’. What people regard as valuable is subjective and, as shown in the draft landscape character assessment, it is the full variety and diversity of the landscapes throughout the district that makes the place.</p> <p>At the end of the second bullet point add “<i>and social well-being</i>”.</p>
Policy SP6	<p>CPRE Protect Kent <b>generally support</b> this Policy, but would like to see an additional point added after point 2. as follows:</p> <p><i>“Ensure that linkages in and between open spaces and with foot/cycle/bridle ways &amp; paths are provided or enhanced wherever possible to provide joined-up off-road routes”.</i></p>
Para 1.81	<p>Given the reliance of the plan strategy on extensive and costly new road infrastructure, as well as the need to provide other new infrastructure to support the scale of development proposed, it is a major failing not to have the infrastructure plan ready at this stage so that respondents can see, and comment on, how it is envisaged that the infrastructure will be delivered. If the Council seeks to persevere with the strategy as currently presented, it is essential that it is consulted on <u>before</u> the final plan is agreed by the Council. It is our strong belief that as currently presented the infrastructure proposed is undeliverable, making the whole plan unsound.</p>

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	<p>We agree that it will be necessary to establish an implementation team to monitor and assist with the achievement of the plan's proposals, but consider that this should involve representation from the local communities affected by the developments proposed. To this end, the following should be added at the end of the paragraph: "<i>, and which it will invite local amenity groups/residents associations/parish councils to join</i>".</p>
Para 1.82	<p>In the first point after "<i>fast</i>" insert "<i>and less polluting</i>"</p> <p>Add a new second point "<i>Improvement and increase of commuter/schoolchildren/student cycle routes into towns and City</i>"</p> <p>Delete the third point (Park and Ride).</p>
Para 1.86	<p>CPRE Protect Kent <b>object</b> most strongly to the proposal of a 'nil CIL'.</p> <p>This, we believe, is a direct result of the extensive and costly new road infrastructure proposed in the consultation draft, and means that local communities will not benefit at all from the major development proposed. This is despite changes made to the CIL regulations which mean that local communities who are being asked to 'host' new development can expect to receive a proportion of the CIL – at least 15% and 25% if they have a Neighbourhood Plan. To contemplate removing this benefit by charging a 'nil CIL' is entirely unacceptable and contrary to Government expectations. It will only result in sus-standard and unsustainable communities, where the full range of social and community infrastructure will not be provided. It should certainly not be the case that the local communities impacted by such major development should be deprived of any potential benefits that would normally be expected from it under the CIL.</p>
Policy SP7	<p>Given the reliance of the plan strategy on extensive and costly new road infrastructure, as well as the need to provide other new infrastructure to support the scale of development proposed, it is a major failing not to have the infrastructure plan ready at this stage so that respondents can see, and comment on, how it is envisaged that the infrastructure will be delivered. If the Council seeks to persevere with the strategy as currently presented, it is essential that it is consulted on <u>before</u> the final plan is agreed by the Council. It is our strong belief that as currently presented the infrastructure proposed is undeliverable, making the whole plan unsound.</p>
Para 1.88	<p>In the first sentence after "<i>delivered</i>" insert "<i>or whether alterations have to be made</i>"</p> <p>In the first point delete "<i>a particular focus on</i>"</p> <p>In the second point delete "<i>including</i>" and replace with "<i>especially</i>". Add at the end "<i>(particularly for locally based businesses)</i>"</p> <p>In the fourth bullet point define "<i>design quality</i>" - are there any particular standards to be imposed/guidance as to where the best design advice should be obtained?</p> <p>Add a sixth bullet point "<i>The improvement of AQMAs</i>"</p>
Para 1.90	<p>In the second sentence after "<i>delivered</i>" insert "<i>or needs alteration</i>"</p> <p>In the third sentence delete "<i>will inevitably</i>" and replace with "<i>may</i>"</p>

<b><u>Chapter 2: Housing Development</u></b>	
Para 2.13	In the sixth sentence after " <i>student accommodation</i> " insert " <i>on campus or on urban sites at Whitstable and Herne Bay</i> ". At the end add " <i>The use of prime urban sites in Canterbury for even more student housing must stop so that such sites can be utilised for private (including affordable) housing</i> "
Paras 2.17-2.31	See Part 1 of our response.
Policy HD1	This Policy allocates existing housing allocations in the 2006 Local Plan, including mixed-use sites, as listed in Appendix 2, as well as the new sites proposed. For clarity, Policy HD1 needs to include a specific reference to Appendix 2 (with the exception of those allocated in the Herne Bay AAP – see our comments on Policy TCL10) as this is the only place that people can see where these sites are.  See also Part 1 of our response for comments on proposed new housing sites.
Para 2.37	In the second sentence, delete " <i>necessary</i> " and substitute " <i>essential</i> ".
Para 2.38	At the end of the first sentence add: " <i>with designs in keeping with the respective sites and the use of locally based materials where possible</i> ".
Para 2.41	In the last sentence delete " <i>require.....justification</i> " and replace by " <i>not grant consent</i> "
Policy HD2	CPRE Protect Kent <b>Support</b> this Policy, but the following should be added at the end of the Policy:  <i>"The City Council will not permit any application to remove or reduce the amount of affordable housing set out in planning consent conditions."</i>
Para. 2.45	CPRE Protect Kent <b>object</b> to the last sentence of the paragraph. We do not see why rural settlements cannot have their built confines defined, even if there are vacant plots within those confines. Whether or not a boundary is defined, a judgement will have to be made in the context of general policies if a planning application is submitted for any such vacant plot. However, the benefit of having a defined boundary is that it distinguishes between what is 'built' and what is 'countryside' in the application of Policy SP4, rather than leaving this to some arbitrary, and potentially inconsistent, decisions made through the development management process. Therefore, CPRE Protect Kent is strongly of the view that boundaries should be defined for the villages, local centres and rural service centres, as well as for the main urban areas.
Para 2.48	In the second sentence after " <i>living</i> " insert " <i>or working in businesses</i> ". At the end of the para add " <i>/businesses</i> "
Para 2.49	In the last sentence delete " <i>should</i> " and replace with " <i>must</i> "
Para 2.50	The final sentence should be deleted as it conflicts with the NPPF which explains that rural exception sites should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. This does not suggest that the needs of one community should be met at another community.
Para 2.53	Add at the end " <i>and to suit the characteristics of the village or hamlet</i> "
Para 2.55	In the third sentence after " <i>assessor</i> " insert " <i>appointed by the City Council, the fees of whom will be payable by the applicant</i> " In the fourth sentence alter the percentage to 15%.

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Policy HD3	<p>CPRE Protect Kent <b>generally support</b> this Policy but:</p> <ul style="list-style-type: none"> <li>• in point d. after "<i>trust</i>" insert "<i>,parish council</i>"</li> <li>• In point g. add to the end of the second sentence "<i>appointed by the City Council.</i>" In the third sentence alter the percentage to 15%.</li> </ul>
Para 2.56	In the last sentence delete " <i>generally</i> " and substitute " <i>sometimes</i> "
Para 2.57	Add to the end of the para " <i>Such information may be assessed by an independent assessor appointed by the City Council, the fees of whom will be payable by the applicant.</i> "
Policy HD4	CPRE Protect Kent <b>support</b> this Policy, but remove the word ' <i>normally</i> ' from the final paragraph
Policy HD5	CPRE Protect Kent <b>support</b> this Policy, but it needs to be clarified whether all of the criteria need to be satisfied ('and' at the end) or just individual ones ('or' at the end).
Para 2.63	Alter the last sentence after " <i>paragraphs</i> " to read " <i>5.58 - 5.66 and satisfy policies DBE1, DBE3, DBE4, DBE5, DBE10, DBE11 and DBE13</i> ".
Policy HD6	<p>CPRE Protect Kent <b>generally supports</b> this Policy but:</p> <ul style="list-style-type: none"> <li>• Add to the start of the second para: "<i>In order to encourage the return of HMO property to private (as opposed to student) residential use, the City Council may in suitable cases permit the conversion of HMOs into more than one residential unit.</i>"</li> <li>• Delete "<i>consideration will be given to permitting</i>" and add to end "<i>will not be permitted</i>"</li> </ul>
After para 2.74	Add a new para as follows: " <i>2.75 The City Council will encourage the building of such accommodation in and around the District where there are good transport links to the places of education and subject to policy HD6.</i> "
Policy HD7	<p>CPRE Protect Kent <b>generally supports</b> this Policy but:</p> <ul style="list-style-type: none"> <li>• Amend point a. to read: "<i>It is the acceptable redevelopment of an existing non-residential site where there is no longer a proven need for the existing use and the site is unsuitable for private housing.</i>"</li> <li>• Delete point e. as it conflicts with point g.</li> <li>• In point g. add at the end: "<i>with occupiers contracting not to bring their cars to the town or city where the development is situated</i>"</li> <li>• In point h. after "<i>policies</i>" alter to "<i>DBE2, DBE3, DBE4, DBE5 and DBE6</i>"</li> </ul>
Paras 2.83-2.85	CPRE Protect Kent find it disappointing that the City Council will not be seeking to address the issue of gypsy and traveller sites in the Local Plan, and that the identification of sites is being deferred to a future DPD.
Policy HD10	<p>CPRE Protect Kent <b>generally support</b> this Policy, but:</p> <ul style="list-style-type: none"> <li>• In point a. after "<i>existing</i>" insert "<i>private or council site</i>";</li> <li>• Point c. is unachievable – by definition any site on the outskirts of a built-up area will mean encroachment in the open countryside; and</li> <li>• In point c. delete "<i>designated in the development plan</i>" and replace with "<i>identified in the Landscape and Biodiversity Appraisal</i>"</li> </ul>

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<b><u>Chapter 3: Economic Development and Employment</u></b>	
Para 3.25	This paragraph needs to reflect the fact that following the exit of Pfizer the site has been reborn as the Discovery Park which has been designated as a new Enterprise Zone and that it has major plans for significant job growth over the coming years.
Para 3.34	Notwithstanding our objections to the strategic sites in Part 1 of the response, the table following this paragraph needs to include the proposed employment elements to the Sturry and Strode Farm Strategic Sites.
Policy EMP1	See Part 1 of our response for comments on the proposed employment sites.
Policy EMP2	CPRE Protect Kent <b><u>generally supports</u></b> this Policy, but: <ul style="list-style-type: none"> <li>• In the second paragraph it is unclear what is meant by “<i>subject to the provisions of Policy EMP1</i>” when that Policy simply identifies sites for business purposes – it has no provisions!</li> <li>• In points 2. and 3. replace “<i>significant</i>” with “<i>unacceptable</i>”.</li> </ul>
Policy EMP3	CPRE Protect Kent <b><u>support</u></b> the Policy as far as it goes, but surely opportunities elsewhere for business ‘start-ups’ should also be encouraged.
Policy EMP4	CPRE Protect Kent <b><u>generally supports</u></b> this Policy, but: <ul style="list-style-type: none"> <li>• In point 1 delete all after “<i>economic strategy</i>”.</li> <li>• In point 2 add at the end “<i>provided evidence is provided that the existing use is not viable</i>”</li> </ul>
Policy EMP5	CPRE Protect Kent <b><u>generally supports</u></b> this Policy, but in point 3 after “ <i>small</i> ” insert “ <i>unlit</i> ”
Policy EMP7	CPRE Protect Kent <b><u>objects</u></b> to this Policy. <p>As well as dealing with UKC, the Policy should reiterate the need for long-term strategies for all the university sites, as explained in para 3.60.</p> <p>Whilst the Policy refers to the UKC campus being shown on the Proposals Map, of more value will be the delineation of the ‘developable site’; i.e. the area already developed and where further potential for development exists. If the Policy relates to the whole campus area, then it could be seen as sanctioning development anywhere within the campus. For example it would be an appalling blot on the landscape (to say nothing of damage to farmland, nature areas etc.) if UKC were to develop north of the Sarre Penn stream, so a line needs to be drawn within which development could be considered subject to the limitations in EMP 7. Thus, the word ‘<i>campus</i>’ should be replaced by ‘<i>developable site</i>’, and this should be the area shown on the Proposals Map.</p> <p>In the introduction delete “<i>business accommodation.....business innovation</i>”. This is entirely inappropriate and certainly would not be the best use of land at the University, especially when such accommodation for this purpose is available in the centre of Canterbury.</p> <p>In the last sentence of the second para insert “<i>and biodiversity</i>” after “<i>landscape</i>”.</p> <p>In the third para add to end “<i>The City Council will discourage or refuse further</i>”</p>

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	<p><i>areas of parking on the campus to lessen reliance on car travel, and to lessen air, light and noise pollution"</i></p> <p>Delete the fourth para.</p>
Policy EMP8	<p>CPRE Protect Kent <b>object</b> to this Policy. We consider that the general support given to student accommodation within the urban area is unacceptable, and will mean that the development of such accommodation will be at the expense of opportunities for other development needs. The second sentence should, therefore, be deleted.</p> <p>In the first sentence, delete "<i>the intensification or re</i>" and add to end "<i>but not for student accommodation</i>".</p> <p>Add at end of para: "<i>together with a landscape and biodiversity strategy. The City Council will expect the transport plan to include provisions to prevent staff and students from bringing cars to Canterbury. The University of Kent has already adopted such a provision.</i>"</p>
Para 3.63	Delete the paragraph
After para 3.65	Insert a new para as follows: " <i>The Council will expect all schools and colleges in and around the City to exclude staff and students from bringing cars to Canterbury.</i> "
Policy EMP10	CPRE Protect Kent <b>object</b> to the allocation of the land at Langton Lane for a new secondary school, and this site should be deleted from the Policy and the Proposals Map.
Policy EMP11	<p>CPRE Protect Kent <b>support</b> this Policy, but remove '<i>normally</i>' from last sentence.</p> <p>See also our comments in Part 1 of our response in regard to Whitstable Harbour and our suggestion that the proposals for the Harbour included in Policy TCL10 should be incorporated into Policy EMP11.</p>
Supporting Rural Business	<p>This section should be split into two section, with sub-headings as follows:</p> <p>a) Agriculture – para 3.69 to 3.73 and policies EMP12 and EMP13; and b) Other rural businesses – paras 3.74 to 3.75 and Policy EMP14</p>
Para 3.70	<p>In the second sentence after "<i>is</i>" insert "<i>also productive of food or</i>".</p> <p>At the end of the para add: "<i>To emphasise the importance of all agricultural land, the National Farmers Union has just stated that Britain now produces only 62% of the food that the country produces (75% in 1991). Putting this into context it means that we are currently importing well over one third of the food we consume, at ever increasing prices, with the transport required adding to the world's and Britain's environmental problems. Consequently, the Council will refuse all applications for development of productive agricultural land and will not specify housing allocations in respect of areas of such land, in order to protect food security for Kent and for Britain.</i>"</p>
Policy EMP12	CPRE Protect Kent <b>support</b> this Policy, but the word ' <i>normally</i> ' should be removed from the last sentence, and the following should be added at the end: " <i>, including previously developed land</i> ".

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<p>Para 3.71</p>	<p>After "<i>buildings</i>" in the first line insert "<i>and structures</i>" and after "<i>silos</i>" insert "<i>poly tunnels, solar farms, wind turbines and fracking developments</i>".</p> <p>Also, delete "<i>Kent Downs Area of Outstanding Natural Beauty (AONB)</i>" and replace with "<i>in the countryside</i>".</p> <p>At the end of the para add a new sentence as follows: "<i>In the case of poly tunnels, solar farms, wind turbines and fracking developments, landscaping and tree screening will be required and when the sites' uses have ceased they will have to be returned to their previous use (including the restoration of land to a productive condition).</i>"</p>
<p>Para 3.73</p>	<p>In the second point delete "<i>recommended</i>" and insert "<i>to be used</i>". In the last sentence delete "<i>should</i>" and "<i>avoided</i>" and insert "<i>is not to</i>" and "<i>used</i>" respectively.</p>
<p>Policy EMP13</p>	<p>CPRE Protect Kent <b>generally support</b> this Policy, but:</p> <ul style="list-style-type: none"> <li>• Insert "<i>, including poly tunnels,</i>" after "<i>agricultural buildings</i>" in the first line; and</li> <li>• add the following as a new paragraph at the end: "<i>for energy proposals Policy CC1 will additionally apply.</i>"</li> </ul>
<p>Policy EMP14</p>	<p>CPRE Protect Kent <b>generally support</b> this Policy, but:</p> <ul style="list-style-type: none"> <li>• In the first point delete "<i>Preferably</i>";</li> <li>• In the second point delete "<i>, including accommodation</i>";</li> <li>• In the third point before "<i>design</i>" insert "<i>positioning and</i>". Also after "<i>the north downs area of outstanding natural beauty</i>" add "<i>and areas of high landscape value</i>"; and</li> <li>• Amend the final sentence to read as follows: "<i>The Council will not support proposals that would result in the loss of existing business premises that provide essential services to the rural areas, unless it is demonstrated that the service is no longer needed or viable and/or a replacement premises is provided.</i>"</li> </ul>
<p>Policy EMP15</p>	<p>CPRE Protect Kent <b>general support</b> this Policy, but the supporting text and the Policy needs to recognise the cumulative effect of such development.</p>
<p><b><u>Chapter 4: Town Centres and Retail</u></b></p>	
<p>Retail Hierarchy</p>	<p>A Policy should be included which sets out this proposed hierarchy and how development will be considered in the context of it.</p>
<p>Local Centres (Policy TCL5)</p>	<p>The Policy and supporting text should also recognise the role of villages as acting as local centres, reflecting the rural settlement hierarchy defined earlier in the plan. The Policy approach would equally apply to the villages as it would to the more urban centres defined.</p>
<p>Policy TCL7</p>	<p>See Part 1 of our response.</p>

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<p>Policy TCL10</p>	<p>In Part 1 of our response we have suggested that the Herne Sites be deleted from this Policy because they are the same as those already allocated in the Herne Bay Area Action Plan. We can see no need for the policies in the AAP to be superseded by re-allocating the sites in Policy TCL10.</p> <p>Also, as we have explained in Part 1 of our response, the Peugeot garage site should be removed from this Policy and given its own Policy and supporting text, and the Whitstable Harbour sites should be removed from the Policy with the provisions included here incorporated into Policy EMP11.</p> <p>This means that Policy TCL10 should only deal with the re-allocation of the mixed use sites previously included in the currently adopted Local Plan.</p>
<p><b><u>Chapter 5: Transport Infrastructure</u></b></p>	
<p>Para 5.1</p>	<p>CPRE Protect Kent is very concerned with the Council's admission that its aspirations for economic and population growth will bring increasing demands on the transport network. These ambitions, as we explain in Part 1 of our response, have resulted in a strategy that is based on significant and costly new road building. We believe that the strategy should seek to reduce the need for, and the impacts of, travel rather than increase them.</p>
<p>Para 5.3</p>	<p>We would query that Manston is <i>'the key enabler to boost the economy of Thanet'</i> as explained here. This, and the proposal for a Thanet Parkway station, may reflect the views of previous administrations at Thanet District Council, but does not reflect the current thinking of the Council as reflected in its recent consultation on its Local Plan.</p> <p>The national air transport picture is that there a great over-capacity of runway space because the number of Air Transport Movements has decreased since 2001, even though passenger numbers have increased. This view is accepted by the industry, despite a lot of rhetoric by some players (ref: Davies Commission evidence). Likewise at the Port of Dover is likely to be affected by the new port across the Thames (Shellhaven), which would have the great benefit of reducing the impact of Dover on Kent and the Dartford crossing. So it is unlikely that Dover would adversely affect the A2 in Canterbury District as claimed here.</p>
<p>Para 5.5</p>	<p>If the city <i>'depends on a large net inflow of commuters to support the level of jobs'</i>, then this situation will be made much worse if more housing were provided than is needed for such commuters.</p>
<p>Para 5.9</p>	<p>We welcome the recognition of some of the issues for rural areas, but the Plan also needs to recognise that the accident rate on rural roads is much higher than on other roads. 749 deaths occurred on single carriageway roads with a speed limit of 60mph in Britain in 2009 – a third of the total road deaths in the country.(see: <a href="http://www.which.co.uk/news/2011/02/new-survey-reveals-rural-overtaking-figures-243685/">www.which.co.uk/news/2011/02/new-survey-reveals-rural-overtaking-figures-243685/</a>). On some roads, such as the C192 from Tyler Hill to Chestfield, many accidents are vehicle-road accidents, rather than vehicle-vehicle accidents, so a general reduction in speeds on all rural roads would be beneficial, and a policy should be included for that aspiration. Similarly such roads are often felt unwelcoming to None Motorised Users (NMUs), and such speed management would help this aspect too. Although most urban areas have a footway between houses and bus stops, shops etc., in rural villages, people have to risk their lives to reach the nearest bus stop</p>

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	<p>or shop etc. hence there is a need for a Policy to achieve a reduction in the number of houses without a footway to the nearest bus stop or shops. Such footways can be made to blend in with the rural area by use of geotextiles, etc., and that further reduces the very low costs of such improvements.</p> <p>Air quality is also an issue in some rural areas, caused by "rat runs", and park and ride attractions to cars from outside as well as within the District, and the presence of major roads in those areas. Unless preventive measures are put in place now, including the withdrawal or reduction of housing allocations in those areas, additional Air Quality Management Areas may arise, with consequent health dangers and loss of well-being to residents and visitors.</p>
<p>Para 5.10</p>	<p>The Council needs to take a more robust attitude with KCC about highways generally, as some KCC policies do not accord with what is needed for the City. We are unconvinced that the Development Management Section of the City Council is making a special case with KCC to reflect the City's special needs.</p>
<p>Para 5.11</p>	<p>We disagree with proposed indicators listed here. <i>'Increasing the number of people using park and ride'</i> implies more cars going to them, which is contrary to using more sustainable modes. As we show in our response to the Park &amp; Ride proposals later, P&amp;R increases the vehicle miles travelled, so is not sustainable. It would be more helpful to have an indicator for: <i>'the numbers of people walking, cycling, using buses or trains'</i>.</p> <p>With regard to air quality, detail should be provided of the measures that will be employed.</p> <p>With regard to the bullet on parking, this should use the term <i>'reducing total car parking spaces'</i> rather than identifying the locale of changes.</p> <p>In the sixth point after <i>"increasing"</i> insert <i>"and improving the separation of"</i>.</p> <p>The final bullet on businesses should contain reference to workplace charging. Several organisations, such as Barretts and Kent &amp; Canterbury Hospital, charge employees for use of workplace car parking. This should be expanded to all business, especially within the city itself, and possibly in Whitstable.</p>
<p>Para 5.19</p>	<p>The text appears to be very car-centred - <i>'Congestion and delays are the main source of problems and frustration for travellers.'</i> Rail delays are usually less than hitherto, and bus delays have been reduced by bus lanes, and travellers sometimes have real time information which is a great help. The cost of rail travel and indeed buses, are more of an issue for many travellers, and the lack of an integrated and safe-seeming cycle route network is also a big frustration.</p>
<p>Policy T1</p>	<p>CPRE Protect Kent <b>generally support</b> this Policy, but:</p> <ul style="list-style-type: none"> <li>• The hierarchy set down in para 5.24 should be included in the Policy (though Park and ride should be excluded);</li> <li>• Reword a) to read: <i>"Preventing development that will increase air pollution and improving the air quality so that dangers to public health are lessened."</i></li> <li>• Alter f) add: <i>"Accepting that new roads and/or junction improvements may bring environmental problems, including traffic congestion and air pollution, and that the environment should take precedence over further economic growth."</i></li> </ul>

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<p>Para 5.26 (Table 2)</p>	<p>Air Quality and Freight should be separated as objectives, and the Air Quality objective should be expanded to <i>'Air Quality &amp; Environment'</i>.</p> <p>Also the Aims should be:</p> <ul style="list-style-type: none"> <li>• Air Quality: <i>'Reduce emissions and, where possible, reverse the adverse effect of transport'</i></li> <li>• Freight: <i>'Enable the sustainable movement of goods with minimal adverse impacts'</i>.</li> </ul> <p>The Transport Modes/issues should be amended to:</p> <ul style="list-style-type: none"> <li>• For Air Quality: <i>'Local air quality management Air quality action plan'</i></li> <li>• For Road Safety, <i>'Safety perceptions (e.g. for NMUs), Reduce Clutter, and advertising on roundabouts'</i> should be added to the Modes/issues.</li> </ul>
<p>Paras 5.28 &amp; 5.29</p>	<p>The major issue for many people, particularly in rural areas, is the lack of a safe footway between a house and the nearest services such as bus stops and shops. This major omission should be recognised and a target put in the Plan.</p>
<p>Policy T2</p>	<p>Whilst CPRE Protect Kent <b>supports</b> this Policy it could be more proactive in promoting and encouraging walking and cycling generally.</p>
<p>Para 5.34</p>	<p>The Plan should identify the routes referred to in: <i>'Stagecoach believes it should be possible to achieve similar frequencies on other key routes in the medium-term through upfront 'Kick-start'-style public investment. These routes could be further improved by additional bus priority measures'</i>. We consider that a key route under-served is Faversham-Canterbury.</p>
<p>Para 5.35</p>	<p>We strongly disagree with <i>'especially for those routes that support the park and ride service.'</i> As we identify elsewhere, P&amp;R is not the optimum solution and bus lanes for the west side of Canterbury and within Whitstable are priorities to reduce delays to the more sustainable mode of standard buses. Hence the second proposal <i>'A28 – new bus link from new development at Sturry and Broad Oak to park and ride site'</i>, should be deleted.</p>
<p>Para 5.36</p>	<p>This seems very vague, and although some linkage with standard buses could be achieved at existing P&amp;R sites, we believe that transport hubs are more appropriate and a higher priority, at rail stations, which currently have very poor bus connections.</p>
<p>Policy T3</p>	<p>Whilst CPRE Protect Kent <b>supports</b> this Policy it could be more proactive in promoting and encouraging use of bus services and expressing the Council's intention to improve services.</p>
<p>Policy T4</p>	<p>Whilst CPRE Protect Kent <b>supports</b> this Policy it could be more proactive in promoting and encouraging use of rail services and expressing the Council's intention to improve services.</p>
<p>Park &amp; Ride (paras 5.39-5.46 and policies T5-T9)</p>	<p>CPRE Protect Kent completely disagree with the claim that P&amp;R provides <i>'a less environmentally damaging alternative to the private car'</i>. While P&amp;R's original impetus came from getting cars out of the city centre, which it has achieved by also increasing city centre car park charges, the current need is to reduce 'vehicle miles travelled' (VMT), and indeed that was the other major intention of P&amp;R - but has not been achieved.</p> <p>Canterbury Park &amp; Ride User Survey 1998 (only Sturry Road &amp; Wincheap sites were in operation at that date) showed previous mode of transport was 86% car, 7% bus, 4% train with 3% undeclared/unknown. So at least 11%</p>

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public transport abstraction compared caused by opening of P&R. Only 10% of users came from A2 west of Canterbury

One aim of P&R is to reduce traffic congestion. However, we have seen no evidence to suggest that traffic congestion in Canterbury City Centre has been reduced since the introduction of park and ride around the City. This issue is enlightened in general terms by a study undertaken by RPS for the Historic Towns Forum in 2009. This study reported that of those Councils who had implemented park and ride to improve congestion and reduce traffic flows, around two thirds reported no change or increased traffic flows into the town centre during peak periods.

A key conclusion from Stuart Meek's research (Stuart Meek, Redefining car-bus interchange to reduce traffic, Doctoral thesis, Loughborough University, June 2010 see: [http://homepages.lboro.ac.uk/~cvmpe/img/Stuart\\_Meek\\_thesis\\_final\\_version.pdf](http://homepages.lboro.ac.uk/~cvmpe/img/Stuart_Meek_thesis_final_version.pdf)) is that VMT is *increased*, not reduced, and in paragraph 11.2.1 it says: *"there is indeed a widely held perception by local authority officers and policymakers that P&R is effective in contributing to car use- , emissions- and congestion-reduction goals. Chapter 9 showed that this is not the case."*

The Abstract says: "Alternative concepts of interchange are shown to offer some potentially significant benefits by reducing the VMT of users. Furthermore, some of the alternative concepts are also shown to offer benefits in terms of the utility that they may provide to the user, and the perceptions on this by local authorities."

The DfT Parking Research Review has shown (amongst other things) that *'When new parking policies are implemented, they should be independently evaluated and the lessons learnt, particularly their contribution to reducing carbon emissions and congestion. Often short term effects are considered but the longer term effects of parking policy have not received as much attention.'* As the current Parking Policy is now somewhat dated, it should receive this type of scrutiny, in order that future policy is based on sound knowledge.

We consider that if P&R is to be successful in reducing vehicle miles and hence reduce emissions, improve air quality, reduced congestion etc., and if existing P&R sites are to be retained, then they will need modifying, and that the City Council will need to carry out a full assessment of the best way forward based on the results of research, not aspirations.

If existing P&R sites are to continue in use, they need to be improved to reduce the negative effects, and we support examples given in the review document ([www.drndi.gov.uk/index/freedom\\_of\\_information/customer\\_information/doc-details.htm?docid=7428](http://www.drndi.gov.uk/index/freedom_of_information/customer_information/doc-details.htm?docid=7428)) which says in paragraph 2.14 *"...conventional services should be upgraded to make diversion to Park and Ride less attractive to existing users of public transport while affording opportunities to integrate Park and Ride with local services without diluting quality. The potential benefits of a more complementary integration are also highlighted by Parkhurst and Meek", and "public transport abstraction, trip generation and the operation of high frequency buses have been identified as three main causes of inefficiency in reducing car use for Park & Ride"*

Para 5.39 refers to *'a requirement for approximately 800 additional park and ride spaces over the Local Plan period* – but any assessment will now be outdated, as this is based on the assumption in the Canterbury Parking

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Strategy 2006 to 2016 that *'it is also important to consider the implications of **continued car growth** and to have a flexible strategy that is able to cope with increases in parking demand.'* (paragraph 5.7 in the Parking Strategy). Car use now is actually declining, whereas the Parking Strategy assumes an 11% growth for the period 2004 to 2011 and 30% growth for the period 2004 to 2026 (page 19). Hence the presumed need to expand parking cannot be defended, especially if the incentive of restricted parking is to be effectively used to persuade people to use more sustainable modes of transport.

For the above reasons we **object** most strongly to the provision of additional Park and Ride and we **object to policies T6, T7, T8 and T9** and the additional provision that they propose. These policies and their supporting text should be deleted from the Plan.

**Policy T5:** CPRE Protect Kent **object** to the identification of this site as a safeguarded site for additional P & R if needed. We fully support the objections to this made by Harbledown and Rough Common Parish Council, but would highlight the following concerns:

- Such speculative safeguarding blights the area and also damages the economic interests of the existing land user.
- There is no identified need for the site, as any perceived need for additional P & R (which we challenge in any event) is set out in paragraph 5.39 and addressed by proposals in policies T6-T8.
- Paragraph 5.38 notes that: *'There is little point promoting alternative forms of transport unless the demand for car parking is carefully managed and controlled.'* Hence provision of excess park and ride capacity goes against the Council's policy to control parking as well as the continuous reduction in annual average mileage per car, which are now down by 11% since 2002 (National Travel Survey 0901, 2012).
- Park & ride in this location would create an additional area of pollution from vehicles, their emissions and noise, and the lighting for the site, in what at the moment is a truly rural area.
- The site is Grade 1 agricultural land, and pages 15 to 16 of Jacobs draft Landscape & Biodiversity Appraisal (2012) shows how little Grade 1 there is in the District, and so needs to be retained for food production.
- The same Appraisal notes that the site is also part of the North Kent Plain as characterised by Natural England, and the North Kent Fruit Belt, both of which would be compromised if Park & Ride were to be built here.
- The site is in the Stour Valley AHLV, and so protected by draft policy LB2, and is visible from many important and well used viewpoints.
- The site is adjacent to the Conservation Area protected by draft Policy HE6. We believe that the Conservation Area would be damaged by the proposal, as recognised by the current Conservation Area Appraisal SPD.
- Proposed Policy T9 gives criteria to be met by any Park & Ride Proposal for Whitstable. We see no reason why such criteria should not be applied to any proposed Park & Ride site, and for Harbledown the proposal would fail to meet these criteria.

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	<ul style="list-style-type: none"> <li>• Previous applications, such as golf driving range (2002) have been refused because of the impact on the landscape (especially the AHLV). It would follow that a Park and Ride site would similarly impact and should be refused for the same reasons.</li> </ul> <p>We believe that there is no need to 'safeguard' the site, and so Policy T5 and its supporting text should be deleted from the plan.</p>
Policy T10	CPRE Protect Kent <b>generally support</b> this Policy, but the final sentence should be re-worded as follows: <i>'Cycle parking should be provided, and will be convenient, secure, covered and where possible complemented by showering and changing facilities for cyclists.'</i>
Para 5.48	<p>The paragraph should be amended to make it much stronger – this is a key policy area, which would have great benefits, and, as noted elsewhere in our response, has already been done for many years by the leading organisations such as Barretts and the Kent &amp; Canterbury hospital. The presumption should be for all organisations to implement this including the City Council itself – Councillors report residents having queried the lack of charging of Council personnel for several years.</p> <p>Proposed amended text:</p> <p><i>'An area-wide workplace parking levy will be investigated in the future, building on the work of organisations in Canterbury who are already charging their staff and/or visitors to park in conjunction with promotion of alternatives as part of their travel plans. The City Council will set an example and amend its Travel Plan in order to reduce car use and the number of single occupancy car journeys made by staff. Options will include increasing the incentives to travel more sustainably, as well as the removal of free car parking at the Military Road offices.'</i></p>
Policies T13-T15 and supporting text	These policies are dealt with in Part 1 of our response and our general concerns about the spatial strategy of the Plan. In accordance with this, <b><u>these policies and their supporting text should be deleted.</u></b>
Para 5.57	<p>This paragraph suggests that in the longer term there is potential for an eastern by-pass from the A2 to the A28 serving the A257 in between. CPRE Protect Kent <b>object</b> to this possibility being signposted in the Plan and shown as a safeguarded route on the Proposals Map. Both the text and the designation on the Proposals Map should be deleted.</p> <p>“Unlocking The Gridlock”, published by Canterbury City Council in 2004, said that “...an outer by pass perhaps linking an improved A2 junction at Bridge with the A2 near Sturry, could not be justified as the proportion of through traffic is relatively low”. The Canterbury District Local Plan First Review of July 2006 stated that an Eastern by-pass “would also have significantly damaging effects on the local environment and landscape”. As recently as 2010 KCC were still saying that such a road would remove only 10% of the through traffic from the City, as most of it had a destination there and so would not be justified. As late as early 2013 the City Council was still asserting that an eastern By Pass was not a project that was being considered – this was included in the Council’s response to an objection to a planning application for housing at the Telecom site in Littlebourne Road. We find it surprising, therefore, to see that it is proposed to safeguard a route for the eastern By-Pass in the Local Plan. This is entirely aspirational, and no details whatsoever are provided to justify the proposal. We are particularly</p>

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	concerned that the road is shown as passing through an SSSI, which is entirely unacceptable.
Paras 5.58 & 5.59	We find these paragraphs very weak and they need to be expanded to give more commitment to addressing the transport issues facing the rural area. A Policy should be included setting out the measures that the City Council will take to this end.
Para 5.62	Amend last sentence to read: <i>'Canterbury City Council will work in partnership with Kent County Council to target those organisations in the District which are generating high volumes of traffic, especially, but not only, those impacting on the AQMA'</i> .
Policy T18	CPRE Protect Kent <b>generally support</b> this Policy, but we feel that it should be strengthened. We would suggest that the first sentence should be amended to read: <i>'Development proposals considered by the Council to have significant transport implications are to be supported by a Transport Assessment and a Travel Plan.'</i> The Travel Plan will invariably be required, because the City Council has assessed the proposal as having significant transport implications, so a travel plan is needed to reduce those implications.
Paras 5.64 - 5.66	Whilst these paragraphs provide some interest they provide unnecessary descriptive detail and should be deleted.
<b><u>Chapter 6: Tourism and Visitor Economy</u></b>	
Policy TV4 and supporting text	<p>CPRE Protect Kent <b>object</b> to this Policy as it fails to provide any safeguards for the countryside. As it stands, such developments would be supported anywhere, so locational guidance and criteria need to be provided.</p> <p>Add at end of the third para add: <i>"or the site does not comply with the Council's current requirements and/or would no longer be granted planning consent"</i></p> <p>Also, neither the Policy nor its supporting text deals with "problem" sites where the operator is in constant breach of planning and caravan site licence conditions, and has been required to put in retrospective planning applications. There should be a statement to the effect that where such sites are put forward for upgrading etc., and there is evidence of existing adverse impact such as: Loss of productive agricultural land; Impact on skyline from short and long distance viewpoints; unsuitability of, and dangers on, access routes to site; noise, light and traffic impact upon rural areas; and which also affects local residents, where there has been permanent residential occupation of site for long periods in breach of planning and caravan site licence conditions, either the site will be closed or enforcement action will be taken, and in any event any applications for upgrading etc. by the operator responsible for these adverse impacts will be refused.</p>
Policy TV5	CPRE Protect Kent object to this Policy because, as explained in para 6.44 there is no requirement for this form of development in Canterbury district. Consequently the Policy is unnecessary and should be deleted.

<b><u>Chapter 7: Climate Change, Flooding and Coastal Change</u></b>	
Para 7.2	after "2020" insert " <i>and also to the 2011 KCC Study Renewable Energy for Kent, and to the Government's forthcoming Planning Guidance on Renewable Energy</i> ".
Para 7.7	This study does not explore in any detail the potential for large scale solar farms, for which a substantial number of planning applications are now being submitted throughout Kent. In the recent CLG 'Planning practice guidance for renewable and low carbon energy' it is clear that this is an issue that local authorities need to deal with in their local plans. This includes identifying the areas where such development might be acceptable. The study should be up-dated to provide this assessment.
Policy CC1	CPRE Protect Kent <b>generally support</b> this Policy. We would like to see the words <i>in appropriate locations</i> " added at the end of the first sentence.  We also consider that the supporting text to the Policy should deal specifically with issue surrounding the location of large scale solar farms reflecting the matters raised in the recent CLG 'Planning practice guidance for renewable and low carbon energy' and the 10 commitments given by the Solar Trade Association (see: <a href="http://www.solar-trade.org.uk/media/STA%2010%20commitments%20v%2010.pdf">http://www.solar-trade.org.uk/media/STA%2010%20commitments%20v%2010.pdf</a> .)
Policy CC2	CPRE Protect Kent <b>generally support</b> this Policy, but we would not see points 1-3 as a hierarchy – there is no reason why these measures should not progress in parallel.  In the paragraph after point 3 the words " <i>and photovoltaic panels on buildings</i> " <i>should be added after</i> "CHP".
Policy CC3 and supporting text	CPRE Protect Kent <b>object</b> to this Policy. In particular we consider that the site size threshold is too high. We say this because the choice, as presented in the Policy, is not between renewables or gas fired CHP, but rather the priority should be given to renewables – for example building mounted photovoltaic panels. This technology can, and should, be promoted generally in the Policy as part of all development, not just on the large sites. We accept that CHP would only be feasible on larger sites, and so a threshold may be necessary for this, but encouragement of renewable should be more general.
Para 7.18	After "resources" insert " <i>permeable hard surfaces, tree planting,</i> ".
Para 7.27	After " <i>including</i> " insert " <i>permeable hard surfaces, tree planting,</i> ".
Policy CC11	CPRE Protect Kent <b>support</b> this Policy, but delete ' <i>normally</i> ' in the sentence after the first set of points a-d.
Para 7.57	Add at the end of the first point " <i>and will modernise and/or repair surface water drainage to prevent "back up" to soil drainage, and thus make it unnecessary to pump partially treated sewage into streams and/or rivers</i> ".
Policy CC13	CPRE Protect Kent <b>support</b> this Policy, but add at end " <i>and to avoid all conflicts of interest the Council may consult independent water experts/engineers, the cost of which will be payable by the developer.</i> "
New Policy	Other local plans have included a Policy which seeks to limit water consumption in new dwellings and this would be helpful here too. For example see the Shepway Core Strategy (submission draft July 2011) Policy CSD5.

<b><u>Chapter 8: Design and the Built Environment</u></b>	
Policy DBE1	CPRE Protect <b><u>generally support</u></b> this Policy, but add an additional point as follows:  <i>"e. The Council will not grant subsequent applications to vary these criteria."</i>
Para 8.10 (Table D1)	Add at the end of Table D1 <i>"Existing and future Air Quality."</i>
Policy DBE3	CPRE Protect <b><u>generally support</u></b> this Policy, but: <ul style="list-style-type: none"> <li>• Add at the end of first para. <i>"which will be healthy and contribute to social well-being"</i>.</li> <li>• After <i>"design"</i> in the second para insert <i>"appropriate to the area in terms of form and materials"</i>.</li> <li>• Add at the end <i>"m. Existing and Future Air Quality."</i></li> </ul>
Para 8.28	After the fourth point add <i>"deal with water usage, drainage, air quality, and light and noise pollution issues."</i>
Para 8.32	Add at the end <i>"The Council will include on the planning files all correspondence and discussion notes on pre-application matters for public inspection."</i>
Policy DBE9	CPRE Protect Kent <b><u>object</u></b> to this Policy, as it is not necessary. Whilst we accept that it will be possible to intensify existing residential areas there is no need for a Policy to explicitly say this. It can happen through the development management process with due regard given to the general policies in the Plan. With regard to allocated sites, it is inappropriate to suggest that sites propose for development in the plan might actually be developed at a higher density than proposed in the site specific policies. The Policy, therefore, undermines the certainty that people expect from the site policies and suggests that high numbers might be acceptable. That is unacceptable. The Policy should be deleted.
Policy DBE11	CPRE Protect Kent <b><u>support</u></b> this Policy, but after <i>"reinforce"</i> in a. insert <i>"improve"</i> .
Policy DBE12	CPRE Protect Kent <b><u>support</u></b> this Policy, but: <ul style="list-style-type: none"> <li>• After <i>"design"</i> in c. insert <i>"and tree planting"</i></li> <li>• In d. delete in the two places <i>"will expect"</i> and insert <i>"may require"</i>.</li> <li>• At the end add <i>"Private local artists will be encouraged to become involved"</i>.</li> </ul>
Para 8.89	In the first sentence after <i>"countryside"</i> insert <i>"and night skies"</i> .
Para 8.90	In the first sentence after <i>"residents"</i> insert <i>", night skies"</i> .
Para 8.94	We agree that the Council should take into account the ILE guidance, but parts of some historic urban areas, particularly Conservation Areas, will not always fall within zones E3 and E4. Delete <i>"will"</i> and insert <i>"may"</i> .
Para 8.96	Under "Orientation", in the second sentence, delete <i>"will"</i> and <i>"encouraged"</i> , and replace with <i>"may"</i> and <i>"appropriate"</i> respectively.  Under "Safety" after <i>"hazardous"</i> insert <i>"where there is no or little illumination from retail premises."</i>

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	<p>Under "Security" add at the end "<i>In most residential situations outside lights in excess of 150watts are not needed.</i>"</p> <p>Under "Environment" add at the end "<i>In some areas there will be no justification for any public outdoor lighting, such as villages and hamlets who decide that they do not wish to have it.</i>"</p> <p>Under "Architectural Lighting" insert 'sensitive' before "illumination" and at end add "<i>also not to detract from nor magnify other nearby lighting schemes.</i>"</p>
Policy DBE13	CPRE Protect Kent <b>support</b> this Policy, but " <i>and tranquillity</i> " should be added to the end of point d).
<b><u>Chapter 9: Historic Environment</u></b>	
Para 9.1	In the third sentence delete " <i>key in.....development</i> " and add to the end " <i>This quality and character should influence all development, which should not only be sustainable, but should enhance or improve the quality and character of the relevant area.</i> "
Para 9.3	Delete ' <i>may nonetheless</i> ' from near the end and replace with " <i>will usually</i> ".
Para 9.11	After " <i>support</i> " insert " <i>and help finance</i> ".
Policy HE2	CPRE Protect Kent <b>support</b> the Policy, but at end add: " <i>Lighting of development within the CWHS and within the buffer zones and settings should not detract from nor reduce the visual impact of the CWHS.</i> "
Policy HE3	CPRE Protect Kent <b>support</b> the Policy, but Insert before " <i>scale</i> " in fourth point " <i>materials</i> ".
Par 9.29	In the third sentence delete " <i>should</i> " and replace with " <i>must</i> "
Policy HE4	CPRE Protect Kent <b>support</b> the Policy, but in the last sentence delete " <i>can be</i> ".
Policy HE9	<p>CPRE Protect Kent <b>support</b> the Policy, but:</p> <ul style="list-style-type: none"> <li>• After the fourth para add "<i>Whenever and wherever possible, the Council may require the removal of inappropriate advertisements, for example when the occupancy or ownership of premises changes.</i>"</li> <li>• Add to the end of the fifth para: "<i>or have adverse visual effects in relation to nearby historic or listed buildings and Conservation Areas.</i>"</li> </ul>
Policy HE10	CPRE Protect Kent <b>support</b> the Policy, but add to end: " <i>Whenever and wherever possible the Council may require the removal of an inappropriate shop front (or part of it) that does not comply with the above criteria, for example when the occupancy or ownership of the premises changes.</i> "
Para 9.63	Add to the end " <i>When the Council is dealing with proposed new tree planting in urban areas or on footways, it may ignore where appropriate the recommendations of KCC arising from KCC's "A New Tree Policy for Kent Highways 2007".</i> "
<b><u>Chapter 10: Landscape and Biodiversity</u></b>	
Para 10.2	Add the following to the end of the first sentence: " <i>and its tranquillity contributes to the health and well-being of residents and visitors alike.</i> "
Para 10.6	Add to end of the para: " <i>Tranquillity is also an important reason why people enjoy and visit the AONB and the Council will protect this through the policies in this Plan.</i> "

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Para 10.7	Add to end of para <i>"and will support membership on the committee by representatives of amenity bodies and parish councils within, or concerned with, the AONB."</i>
Para 10.10	Add at the end <i>"However, the National Planning Policy Framework explicitly states that the presumption in favour of sustainable development does not apply within the AONB, and that major development is only acceptable in exceptional circumstances."</i>
Policy LB1 and supporting text	CPRE Protect Kent <b>support</b> this Policy, but in the second sentence after "AONB" insert <i>"or that endangers its tranquillity"</i> .
Policy LB2	CPRE Protect Kent <b>support</b> this Policy
Policy LB5	CPRE Protect Kent <b>support</b> this Policy, but in the second para delete <i>"is unable to"</i> , put an s on <i>"conclude"</i> and alter <i>"no"</i> to <i>"an"</i> .
Policy LB6	CPRE Protect Kent <b>support</b> this Policy, but delete <i>"significant"</i> from b.
Para 10.40	Add to the end: <i>"The Council proposals also include "Green Gaps" which too play an important part in conserving and assisting biodiversity, and in maintaining the difference between the built environment and the countryside. The Council will ensure that the integrity of these Gaps remains and will not permit development within them."</i>
Policy LB7	CPRE Protect Kent <b>support</b> this Policy, but: <ul style="list-style-type: none"> <li>• in the second sentence delete <i>"the"</i> and replace with <i>"any"</i>.</li> <li>• In the third sentence delete <i>"measures.....required."</i></li> <li>• Add at end <i>"development will not be permitted."</i></li> </ul>
Policy LB8	CPRE Protect Kent <b>support</b> this Policy, but add to b. <i>"Any lighting that is harmful/disruptive to such species will not be permitted"</i> .
Policy LB10	CPRE Protect Kent <b>support</b> this Policy, but in the first para after <i>"enhancement"</i> insert <i>"and to lodge these with planning applications."</i>
Para 10.65	Add at the end <i>"Resist KCC's recommendations from its "A New Tree Policy for Kent Highways 2007" in respect of tree conservation and planting in urban areas in order to foster social well-being and help reduce air pollution."</i>
Policy LB12	CPRE Protect Kent <b>support</b> this Policy, but there needs to be a definition of 'important' in point a)
Para 10.67	After <i>"settlements"</i> insert <i>"reduce air pollution in urban areas, promote social well-being,"</i> .
<b><u>Chapter 11: Open Space</u></b>	
General comment	The chapter places emphasis on the recreational and public health functions of open space, but very little on the environmental services which open space provides in terms of biodiversity habitat, flood protection etc. This dimension needs strengthening.
Para 11.4	We welcome this paragraph, but much more emphasis should be placed elsewhere in the chapter on the Ecosystem Services which open space provides.
Para 11.6	The need for new open space as part of the new developments proposed is noted, but for each of the development sites proposed there needs to be a detailed breakdown of new open space, stating where each new area will be, how large it will be and what its main function will be. See our comment also on Paras 1.56 & 1.57 and policies SP3a-h, which highlight the need for more site specific details about what is proposed.

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Para 11.7	We agree with this point, but the incorporation of open space in new residential areas should not be used to justify the removal of open space in existing residential areas.
Paras 11.13, 11.14, 11.19, 11.21, 11.22, 11.33, 11.42, 11.43 & 11.71	These paragraphs present various, and different, definitions of open space which causes confusion. Just one definition should be used.
Para 11.15	This paragraph is out of place in this part of the chapter which is focussing on the definition and typology of open space. It would be more relevant to Policy OS 1, OS 8 and OS 9.
Paras 11.16 & 11.17	<p>We disagree with the statement that local green space designations are not appropriate for most green areas – they are exactly the areas that the designation would apply to, and would comply with the bullet points that follow.</p> <p>The Council should actively invite locally communities to put sites forward for designation, and consideration should be given to so designating some of the very narrow green gaps between settlements, i.e. between:</p> <ul style="list-style-type: none"> <li>• Sturry and Canterbury;</li> <li>• Sturry and Broad Oak;</li> <li>• Blean and Rough Common; and</li> <li>• Canterbury and Tyler Hill</li> </ul>
Para 11.25	We welcome the identification of quality standards, but the plan should explain how these will be monitored.
Policy OS1	CPRE Protect Kent <b>support</b> the Policy but it is unclear whether all conditions need to be met or only one condition. The ‘and’ and ‘or’ at the end of each criterion needs to be reviewed.
Policy OS4	CPRE Protect Kent <b>object</b> to this allocation, as we consider it is the wrong location for such a use. Delete Policy and supporting text.
Paras 11.34 & 11.35	We agree with these paragraphs, but they would fit better under the section on ‘The Need for Open Space’.
Para 11.36	The list of significant recreational space should include Kingsmead.
Para 11.37	We find this paragraph to be misleading as the Sturry Road Community Park suffers from a number of serious disadvantages which limit its usage: its isolated location; position on the eastern edge of the city; and close proximity to the sewage plant with its associated unpleasant smells. We find it disingenuous for the Council to use the large size of the park as a justification to remove open space elsewhere in Northgate (e.g. Kingsmead Field in the west of the ward).
Policy OS5 and supporting text	<p>CPRE Protect Kent support the concept of Green Gaps, but we find the comments in paragraph 11.46 incredulous when it is the proposals in the Local Plan itself that are compromising the existing gaps between settlements. Seemingly little regard has been given to this in making the strategic allocations. For example, together the Herne Bay Golf Course site and the Strode Farm site obliterate the remaining green gap between Herne village and Herne Bay and the proposal at Sturry all but closes the any separation between Sturry and Canterbury and between Sturry and Broad Oak – the gaps proposed here are little but tokenism. This is very much a situation of ‘locking the stable door after the horse has bolted’, though the Council has the opportunity to rectify this by reviewing the Plan strategy as we suggest in Part 1 of our response.</p> <p>CPRE Protect Kent <b>support</b> Policy OS5, but the word ‘<i>significantly</i>’ in part a.</p>

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	should be removed, as in some of the very small gaps any development will cause coalescence because they are so narrow.
Policy OS6	CPRE Protect Kent <b>support</b> this Policy, but the word ‘ <i>significantly</i> ’ in part b. should be removed.
Policy OS7	CPRE Protect Kent <b>support</b> this Policy, but add the following sentence at the end:  <i>“Proposals that involve floodlighting will not be permitted.”</i>
Policy SO8 and supporting text	CPRE Protect Kent <b>support</b> this Policy and the comments made about the importance of existing open space in the supporting text. However, these are hollow words given the Council’s decision to allocate the Kingsmead Field for development. This decision fundamentally contravenes the objectives of this Policy undermining any confidence in the Council’s convictions as stated. The Kingsmead Field should be shown as an area of open space on the Proposals map, not as a site allocated for development.
Policy OS9	CPRE Protect Kent <b>object</b> to this Policy, as it is the complete opposite to the approach advocated in Policy OS8, which would see any development proposed on open space being refused. The Policy should be deleted and its supporting text included before Policy OS8.
Policy SO10	CPRE Protect Kent <b>support</b> this Policy, but the phrase ‘ <i>elsewhere in the locality</i> ’ should be defined in the supporting text. We would suggest that this should be defined as ‘ <i>within easy walking distance of the development proposed but no further than 400m</i> ’.
Policy SO11	CPRE Protect Kent <b>support</b> this Policy, but the commitment in point b. to protect and improve existing areas of open space rings hollow given the decision to allocate the Kingsmead Field for development. This decision undermines any confidence in the Council’s convictions to protect and improve areas of existing open space as stated in this Policy.
Policy OS12	CPRE Protect Kent <b>support</b> this Policy, but on the Policies Map it is unclear what the extent of the corridor is as it is shown with the same notation as for open space sites under Policy SO8. A different notation should be used on the Proposals Map.  The Kingsmead Field site should be shown as being within the corridor.
Policies OS13 and OS14 and supporting text	CPRE Protect Kent <b>support</b> these policies, but we feel that the supporting text could be more promotional of allotment usage and the benefits that allotments have for physical and mental well-being.
<b><u>Chapter 12: Quality of Life</u></b>	
Para 12.2	After “ <i>shopping</i> ” insert “ <i>public houses</i> ”.
Para 12.8	After “ <i>services</i> ” insert “ <i>, to financially assist and to</i> ”.
Policy QL1	CPRE Protect Kent <b>support</b> this Policy, but for developments in the rural area an additional paragraph should be added as follows:  <i>“In the rural areas, in addition to the above, proposals should be well related to an existing settlement and not in the open countryside. As a priority they should involve the reuse of an existing building or previously used land within, or immediately adjoining, the settlement boundary.”</i>

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Policy QL3	<p>CPRE Protect Kent <b>object</b> to this Policy. The following changes should be made:</p> <ul style="list-style-type: none"> <li>• In point a) 'or' at the end should be changed to 'and'; and</li> <li>• Point b) should be deleted – the mere fact that there is an alternative provision for a similar type of use nearby should not be taken as an automatic justification for loss, and this has not been accepted in planning appeal decisions.</li> </ul>
Para 12.21	<p>After "location" in the third sentence insert "<i>the nature of the goods to be sold, e.g. whether they are locally produced and not imported, nor transported over long distances, and whether the greater proportion is produced on the farm or a nearby farm,</i>"</p>
Policy QL7	<p>CPRE Protect Kent <b>support</b> these proposals, but the supporting text needs to provide more detail as to exactly what community purposes the sites are allocated for.</p>
Policy QL9	<p>CPRE Protect Kent <b>generally support</b> this proposal, but both the Policy and the supporting text need to provide more detail as to what exactly the site is safeguarded for. For example, what is actually meant by "<i>health-related development</i>", as it could cover a wide range of potential uses which could have different impacts on then surrounding area?</p>
Policy QL10	<p>CPRE Protect Kent <b>support</b> the provision of new medical and health facilities, but more guidance should be given in the Policy as to where they are provided, especially in the rural area. We would suggest that this Policy should be recast along the same lines as that for Policy QL1 (including our proposed amendment).</p>
Para 12.44	<p>Reword to read as follows:</p> <p><i>"The Council recognises the poor quality of air in some areas of the District, notably the AQMAs, that it presents a danger to public health and social well-being, and that the amount of pollution at times exceeds the World Health Organisation limits. The Council further recognises that this pollution is caused mainly by traffic fumes/particulates, and that development in urban areas increases traffic, thus having worsened the problems since 2002. The Council is determined to reduce the pollution so that Air Quality is within World Health Organisation guidelines. It will continue to monitor and assess air quality on an annual basis at times when traffic is heaviest."</i></p>
Para 12.49	<p>Please state whether a detailed assessment took place in 2012 or 2013 and the results.</p>
Para 12.50	<p>After "issues" in the first sentence insert "<i>in order to protect public health and social well-being.</i>"</p> <p>In the last sentence after "houses" insert "<i>student accommodation, retirement/residential/nursing homes</i>".</p>
Para 12.51	<p>Please define "<i>mitigation measures</i>" and ensure that they are included in planning applications so that the measures are in the public domain before the application is considered.</p>
Para 12.52	<p>After "<i>unacceptable</i>" insert "<i>The Government states that where public health is endangered this may be a ground for refusing planning consent.</i>"</p>
Para 12.53	<p>At the end add "<i>Such assessments must be lodged with planning applications.</i>"</p>
Policy QL11	<p>CPRE Protect Kent <b>support</b> this Policy, but the word 'normally' should be deleted from the final sentence.</p>



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Policy QL12	CPRE Protect Kent <b><u>generally support</u></b> this Policy, but the supporting text needs to elaborate on what sort of mitigation measures may be employed.
Policy QL13	CPRE Protect Kent would question the need for this Policy as these will be matters that will be addressed in the Waste Local Plan being prepared by KCC.



## **Annex A**



Canterbury District Local Plan Preferred Option Consultation Draft –  
June 2013

Comments from CPRE Protect Kent

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Comments from CPRE Protect Kent

MR BRIAN LLOYD.  
CPRE PROTECT KENT.

9/8/2013.

PROPOSED HOUSING DEVELOPMENT AT CANTERBURY: WATER SUPPLY IMPLICATIONS.

1. For a development comprising 15,600 dwellings; if we assume an average occupancy of 2 consumers and a per-capita consumption of 135 litres/head /day, ave. daily demand would be 4.2 MI/day.
2. Canterbury is served by South East Water and is situated in their Eastern supply area, which corresponds to the former Mid Kent supply areas of Ashford, Canterbury, Maidstone and Tonbridge/Tunbridge Wells.
3. The Company's Draft Water Resource Management Plan(WRMP,) which is now with Defra, includes supply / demand forecast for the period-2015-2040, as follows:-

2015	+8.7MI/d
2020	- 1.6
2025	-17.7
2030	-29.0
2035	-41.0
2040	-52.8

They therefore anticipate a substantial deficit, possibly exceeding 50MI/d , arising during the 25 year period, which we can perhaps assume to be roughly concurrent with the proposed development.

- 4 The Plan makes provision for an increase in supply capacity of up to 60MI/d, but most of the constituent schemes have yet to be assessed with respect to feasibility and cost effectiveness in terms of CAPEX/OPEX. Furthermore there are no plans for commissioning any of the larger schemes before 2023; the earliest, probably Aylesford wastewater re-use at an estimated deployable drought output (DDO) of 12.5 MI/d for the Maidstone area. There is nothing scheduled for Canterbury before 2030; the earliest here being Broadoak at 13.5 MI/d in 2033 and Reculver borehole at 8.4 MI/d in 2034.
- 5 On this basis, the area serving Canterbury (either directly, or indirectly by internal bulk transfers) could, by around 2034 /35 have an additional 22 MI/d of supply capacity to set against the forecast deficit of 41.0 MI/d. If we then assume that by this time the housing development will be more or less complete, then we have to take account of the corresponding additional public supply requirement of 4.2 MI/d; giving a total potential deficit of 45.2 MI/d. By 2034 /35, assuming that the Company can deliver on their scheduled scheme outputs we will be looking at a net deficit of  $45.2 - 22.0 = 23.2$  MI/d. This is in a supply area already identified by the Environment Agency in their November 2012 Consultation Document “ Improving the Classification of Water-Stressed Areas” as Seriously Stressed; and this assessment has been made at a time when there is at least a small residual surplus in the SEW Eastern Area.
6. We must also take into account the additional demands expected to arise in the same supply area from the proposed developments in Ashford (including Chilmington Green) and Maidstone; and we also need to establish whether these or other previously unidentified developments were taken into account in the WRMP 14 demand forecasts. If not they will need to be added to the total net deficit which already substantially exceeds the Company's anticipated increase in supply capacity. There may be scope for



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bringing some of the major schemes further forward in the programme but this will, for the most part, be limited by the relatively long lead times.

7. In any event, we have to conclude that, failing recourse to a new major strategic source of supply (not as yet identified), the Company will, in our view, be unable to guarantee the minimum level of deployable drought output required to ensure security of supply for consumers in the Eastern supply area.

GD WARREN.

MSc, DIC, FGS, MICE, C.GEOL, C.ENG (Retd.)



## **Annex B**





Comments from CPRE Protect Kent

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**Canterbury District Local Plan**  
**Preferred Option Draft**

Representation on behalf of Herne and Broomfield Parish Council

and CPRE Protect Kent

1 Context

1.1 The Parish Council and CPRE Protect Kent have serious concerns over some of the strategic site proposals in the draft Canterbury District Plan, in particular the relationship between the proposed development and the new transport infrastructure that is proposed to enable it to happen. This report has been commissioned by the Parish Council and CPRE Protect Kent to assess the transport issues relating to these sites.

1.2 The report focuses on three matters:-

- the potential inability of the development generally to fund the new infrastructure shown on the indicative plans,
- the location of the new areas to the north and east of the City which will funnel additional traffic through A28 at Sturry
- the particular issues at Herne itself

2 Implications of the cost of provision of new infrastructure

2.1 The sites of major concern to the Parish Council and CPRE Protect Kent are listed below. They involve a large amount of new transport infrastructure in the form of new roads, bridges and junctions or interchanges as follows:-

Site 1 – South Canterbury

1 grade separated interchange on A2  
4.7 km of new road

Site 2- Land at Sturry/Broad Oak

1 bridge over railway

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2 bridges over rivers  
2.7 km of new road.

Site 3- Hillborough

2 bridges over railway  
3.3 km of new road.

Site 4 – Herne Bay Golf Club

0.8 km of new road.

Site 5 –Strode Farm

1.4 km of new road.  
1.8 km of improvement to Bullockstone Road (effectively new road)

Site 8 – Land north of Hersden

3.2 km of new road

2.2 The length of new road mentioned above is particularly important as it relates to those roads specifically indicated as serving a purpose of providing new strategic links. This will provide local benefit insofar as it may remove some traffic from some communities but it does mean that such roads will have to be of a standard suitable for what in most cases will be “A” class roads. As such, they will have to be designed in accordance with Government Highway Standards with no, or minimum, direct accesses. Other roads serving the new development itself can be considered against the standards in Manual for Streets and the cost of these will be in addition to the figure calculated below.

2.3 This report of necessity has to deal with cost estimates in rounded terms, but there will be local issues which will cause costs to vary wildly. An example is in relation to the proposed relief road at Sturry. This runs across a flood plain and it will be necessary to build the embankment on imported free draining material which will add considerably to its cost as will the difficulty of founding structures on the challenging ground by the river Stour.

2.4 In summary, the costs of the proposals involving the indicative provisions of the new infrastructure could be:-

3 bridges over railways @ £7m	£21m
2 bridges over rivers @ £6m	£12m
17.9 km of new road @ £2m/km	£35.8m
Grade separated interchange on A2 @ £25m	£25m
ie a total of	£93.8m

2.5 In addition there must also be allowance made for new junctions with, and the improvement of the scale and structure of, existing roads as well as the provision of other features such as Fast Track bus routes, so the final figure will be well in excess of £100m.

2.6 It is recognized that these figures are not technical evaluations based on detailed designs, as these are not available, but they are substantive indications produced with professional knowledge and demonstrate the level of funding required for new road and general transport infrastructure alone. In terms of the 8000 homes in the six areas listed above, this equates to a figure of over £12,500 per dwelling on average across the sites, though of course this will vary from site to site because of the specific infrastructure needed. To this must be added those contributions which will be demanded to meet educational and social needs.

2.7 Although the Plan covers the period up to 2031, there is nothing to indicate that there will be a reversal in the lack of availability of Central and Local Governmental funding, therefore it is likely that the development will have to meet virtually all these on-costs. It is the justifiable concern of the Parish Council and CPRE Protect Kent that either the developments will proceed without the new peripheral infrastructure or that the Plan is undeliverable because of the extent of the new road infrastructure required.

### 3 Location of proposed new development areas – east and north of Canterbury

3.1 The city of Canterbury will be the focus of most transport journeys. This means additional traffic from the 1000 new dwellings proposed for Hillborough will use the A291 through the village of Herne and Herne Common. This road is already heavily used and is a concern to local residents without the extra traffic.

3.2 The 400 houses at Herne Bay Golf Club are shown as having access direct to Bullockstone Road. In places this little more than a country lane and joins A291 at Herne Common. There is additional reference to this road in section 4.

3.3 The 800 house proposed for Strode Farm again will generate additional traffic on to A291 into Canterbury.

3.4 At the village of Sturry, all this additional traffic will be joined by that from the 800 homes proposed at land north of Hersden which will arrive via A28.

3.5 A further 1000 new homes are proposed for land at Sturry/Broad Oak, although it is accepted that this site does include reference to a new “relief road” and improved facilities for crossing the railway.

3.6 The location the sites described above raises three basic concerns. Firstly, there is no apparent indication of phasing of the developments therefore it is entirely possible that the outer sites will be completed early thus delivering additional traffic through Sturry where congestion and delay are notorious. The poor junction between A291 and A28 causes delay and danger and its location so close to the railway crossing on the Canterbury to Thanet line exacerbates the problems.

3.7 Secondly, once the outer areas are developed, which are likely to be less costly in terms of construction costs and land prices, the development at Sturry, with its road improvements, may fail to materialize. It is noted that in para 5.55 of the Plan that the Council has “entered into a Memorandum of Understanding with KCC to ensure Sturry Crossing is delivered”. It is unclear what authority this memorandum actually has or whether it is just wishful thinking, but it is the key element of new infrastructure essential for the area. It is essential that this road be built and opened before any further development takes place which will add traffic in the vicinity.

3.8 Thirdly, even if the new relief road in Sturry were to be built, it rejoins the existing A28 near the Park and Ride site meaning that the remaining section of the road into the City has to be navigated. This again is notorious for delay and congestion with its multitude of accesses and points of constraint.

3.9 In all these regards, it is concerning that there is no detailed transport strategy supporting the Plan to give confidence that the significant infrastructure proposed will actually be delivered. It is impossible for anyone

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responding to the draft Plan to see how it is intended that the road infrastructure will be delivered in the time-scale of the Plan period.

3.10 It is also of concern that the Plan contains three short paragraphs (5.64-5.66) describing the VISUM multi-modal traffic model used to test the development plans. Although this is an accepted tool for evaluating traffic impacts it is by no means perfect and any results must be carefully interpreted, but none are provided. It is noted in para 5.66 that “Visum has been carried out on a number of development scenarios including all the proposed strategic allocations” but there are no details of what these are or the impact of any phasing of such developments. Such omissions are a major concern to the Parish Council and CPRE Protect Kent as the “funneling” effect of existing traffic through Sturry is already a very significant problem.

### 4 Transport issues in the village of Herne

4.1 The indicative proposals for the development at Hillborough show most of the site will connect to Reculver Road/ Mill Lane and this system has direct linkage to Herne and is likely to add to the problem with rat-running traffic which already occurs.

4.2 The roundabouts which serve the slip roads from A299 to A291 are relatively small in diameter and built to serve the traffic at that time. Already, there can be significant delays at the roundabout at the north side of A299 and the fear is that these will worsen. The roundabout at the southern side of A299 already has 5 legs and the development proposals show this will be increased to 6. This is a large number of connections to any roundabout, yet alone one with a small diameter, with the result there is great concern that this can be done in a safe and commodious manner.

4.3 Mention has already been made in para 3.2 of the deficiencies in Bullockstone Road which is currently subject to a 7.5 tonne weight restriction due to its poor alignment, narrow width in places and evident structural weakness, yet the development planned for Strode Farm connects directly to it with a road which is described as a “new relief road for Herne”. Presumably this is meant to indicate a new route for A291, in which case it will need to be of proper width and alignment. Such standards will need to apply to the existing Bullockstone Road which will mean the provision of virtually a new road and inevitably involve land acquisition, with significant improvements to its junction to the south with Canterbury Road. A further junction improvement will be needed at its northern end as more development is planned for the area south of Greenhill for which the only logical access is on to Bullockstone Road. There is no clear reference for the need to improve this road on the proposals plan.

4.4 The need for this improvement is even more important as is also needed to serve the new development proposed for Herne Bay Golf Club, for which the main access is also on to Bullockstone Road.

4.5 The Parish Council is already aware rat running issues with traffic from Beltinge and the Hwathorne Corner area using roads in the village to gain access to A291 and is anxious that this should not be exacerbated. It is unclear how this issue will be addressed in the Draft Plan and the deliverability of the indicated improvement of the junction between A299 and Heart in Hand Road is questioned both in terms of cost, land acquisition and technical standards bearing in mind the proximity of the Broomfield junction.

### 5 Meeting with Local Authorities

5.1 I have been informed that a meeting took place on 12 August between representatives of the Parish Council and CPRE Protect Kent and officers from the Kent County and Canterbury City Councils to discuss the type of issues raised in this report.



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5.2 It would appear that highway matters have not yet been fully studied, more traffic modeling work has to be done, no details were available on likely costs and there was little information on how the transport elements of the Plan would be implemented.

5.3 It was stated that the Sturry Relief Road would be the No 1 priority but there was no detail on how this programming and co-ordination could be achieved.

5.4 This confirms that the concerns expressed in this report in relation to delivery (see para 3.9), implementation (para 5.2) and co-ordination (para 3.7) of the essential transport infrastructure needed as part of the Plan are entirely valid.

5.5 Of particular importance is the fact that the “Memorandum of Understanding” relating to the provision of the Sturry Relief Road referred to in this report in para 3.7 and to which attention is drawn in the Plan, does not exist. This is very alarming and increases the already considerable concern of the Parish Council and CPRE Protect Kent.

### 6 Summary

6.1 Whilst the Parish Council and CPRE Protect Kent are quite prepared to consider plans for the future development of Canterbury District, it is considered essential that such plans need to be carefully thought through with details as to how all the implications of such development can be fully and suitably accommodated. In the case of this report, it is the transport proposals which are raised.

6.2 It is essential that there is a proper transport strategy for the whole area demonstrating how the needs of the new development can be met without adversely affecting the existing population and that such a strategy is fully sustainable and can be delivered. It is considered that the present Draft Plan does not appear to set out in detail such a deliverable strategy. Large areas of new development are shown together with significant new transport infrastructure but as it is likely that the development will have to fund the schemes, the cost per unit could well prove prohibitive and therefore the actual realization of the projects is questioned.

6.3 It is also considered that the present proposals in the Canterbury District Local Plan Preferred Option Draft indicate a large amount of new development in a sector of the City which already feeds traffic into the A28 at Sturry and which is subject to notorious congestion and delay. It is recognized that the proposals for development at Sturry include a new relief road but there must be a risk to the whole strategy if this new road cannot be delivered. Furthermore it needs to be built before any new development takes place and it is felt that the “Memorandum of Understanding” for its provision is insufficient to guarantee the scheme. In fact it would now seem that there is no “Memorandum of Understanding” at all.

6.4 Whilst concern at the issues raised in connection with the proposals at Strode Farm is shared by both Herne and Broomfield Parish Council and CPRE Protect Kent, it is the Parish Council which is particularly anxious to ensure that the quality of life and safety of its local people are not jeopardized. There is major concern that a “new relief road for Herne” to the proper design standards for a realigned A291 is not deliverable, nor has there been adequate reference and account taken of the need to radically improve virtually the whole length of the existing Bullockstone Road.

T J Payne C Eng MICE  
Transport Planner

On behalf of Herne and Broomfield Parish Council and CPRE Protect Kent

Aug 2013



Canterbury District Local Plan Preferred Option Consultation Draft –  
June 2013

Comments from CPRE Protect Kent

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