

Draft Canterbury District Local Plan 2040
Regulation 18 Consultation 2024

CONSULTATION AND ENGAGEMENT TOPIC PAPER

(FEBRUARY 2024)

Contents page

| | |
|---|----|
| 1. Introduction | 2 |
| 2. Issues Consultation (2020) | 3 |
| 3. Options Consultation (2021) | 5 |
| 4. Consultation on the draft Canterbury District Local Plan to 2045 (2022) | 9 |
| 5. Consultation on the draft Canterbury District Local Plan 2040 (March 2024) | 11 |
| Appendices | 18 |

Appendix 1: Issues Consultation Responses (2020)

Appendix 2: Options Consultation Responses (2021)

- Appendix 2.1: Consolidated report
- Appendix 2.2: Consultation survey responses
 - Appendix 2.2.1: Employment
 - Appendix 2.2.2: Historic and Natural Environment
 - Appendix 2.2.3: Housing
 - Appendix 2.2.4: Movement
 - Appendix 2.2.5: Town Centres and Local Facilities
 - Appendix 2.2.6: Town Centres Strategies
 - Appendix 2.2.7: Vision and Growth
- Appendix 2.3: Written representations
- Appendix 2.4: Officer responses

Appendix 3: Draft Canterbury District Local Plan to 2045 (2022) Regulation 18 Responses

- Appendix 3.1: Consultation responses: Canterbury Draft Local Plan to 2045 (Regulation 18)
- Appendix 3.2: Quantitative data
 - Appendix 3.2.1: Chapter 1: Spatial Strategy for the District to 2045
 - Appendix 3.2.2: Chapter 2: Canterbury
 - Appendix 3.2.3: Chapter 3: Whitstable
 - Appendix 3.2.4: Chapter 4: Herne Bay
 - Appendix 3.2.5: Rural Areas
 - Appendix 3.2.6: District-wide Strategic Policies
 - Appendix 3.2.7: Development Management Policies
- Appendix 3.3: Qualitative data, including officer responses
 - Appendix 3.3.1: Chapter 1: Spatial Strategy for the District to 2045
 - Appendix 3.3.2: Chapter 2: Canterbury
 - Appendix 3.3.3: Chapter 3: Whitstable
 - Appendix 3.3.4: Chapter 4: Herne Bay
 - Appendix 3.3.5: Rural Areas
 - Appendix 3.3.6: District-wide Strategic Policies
 - Appendix 3.3.7: Development Management Policies

- Appendix 3.4: Written representations
- Appendix 3.5: Consultation survey responses
 - Appendix 3.5.1: Chapter 1: Spatial Strategy for the District to 2045
 - Appendix 3.5.2: Chapter 2: Canterbury
 - Appendix 3.5.3: Chapter 3: Whitstable
 - Appendix 3.5.4: Chapter 4: Herne Bay
 - Appendix 3.5.5: Rural Areas
 - Appendix 3.5.6: District-wide Strategic Policies
 - Appendix 3.5.7: Development Management Policies
 - Appendix 3.5.8: Habitat Regulation Assessment
 - Appendix 3.5.9: Sustainability Appraisal of the Call for Sites
 - Appendix 3.5.10: Sustainability Appraisal of the draft Local Plan
- Appendix 3.6: Consultation questionnaire

1. Introduction

This paper sets out a summary of the engagement and consultation undertaken to date in the development of the draft Local Plan which began in 2019.

The council's adopted Statement of Community Involvement (2019)¹ explains how we aim to involve the community in our planning functions.

Prior to the start of the issues consultation, officers undertook some early engagement to help identify key themes for consideration as part of the Local Plan process. This included meetings with all parish councils across the district.

An initial consultation took place between 1 July and 30 September 2020 on the issues affecting residents and their local area.

The outcomes of this consultation were used to inform the draft District Vision and Local Plan Options consultation which took place between 4 June and 9 August 2021.

The council subsequently undertook consultation on a full Draft Canterbury District Local Plan to 2045 (Regulation 18) between 24 October 2022 and 16 January 2023. Over 2,000 responses were received from individuals and organisations, comprising over 24,000 individual representations on specific policies across the whole Local Plan.

This report sets out our analysis of these representations and how they have informed the revised Draft Canterbury District Local Plan (2040) which has been published for further consultation between 11 March and 3 June 2024, in line with Regulation 18 of the Town and Country Planning Regulations (2012).

This version of the Consultation Topic Paper supersedes the version published in October 2022.

¹ [Statement_of_community_involvement_19.pdf](#)

2. Issues Consultation (2020)

To help us understand the issues affecting residents and their local area, an initial consultation took place between 1 July and 30 September 2020.

This consultation received 445 responses containing over 9,000 individual comments.

We also held a variety of events as part of the issues consultation:

- Local Plan Issues Conference - 20 July 2020 (attended by over 100 delegates from local organisations and statutory bodies)
- Developer Conference - 22 July 2020 (attended by the development industry)
- Town Centre Strategy Conferences (attended by local residents groups, councillors, local and national organisations):
 - Whitstable - 16 September 2020
 - Herne Bay - 22 September 2020
 - Canterbury - 29 September 2020
- Secondary School Conference - 16 October 2020 (attended by the Langton, Spires and Whitstable Schools)
- Transport Conference - 22 October 2020 (run in partnership with Kent County Council and attended by local and national organisations)

Through this consultation and engagement with the community, including businesses, schools and local organisations, some clear priorities were identified:

- The need to diversify and strengthen the local economy, build on our strengths including our universities, and provide high skilled jobs, including science and technology, which support the retention of graduates and improve opportunities for local young people
- The need to deliver a range of market and affordable housing to meet local needs, particularly as house prices are high relative to local incomes
- The need to proactively lead on climate change, aim for zero carbon and support the green economy

- The need to ensure new homes and communities are well designed, at appropriate densities and with access to facilities and open space
- The need to improve connectivity for residents and businesses, tackle congestion and air quality, particularly on the Canterbury ring road and at the coastal towns
- The need to deliver community infrastructure as part of, if not ahead of, new development
- The need to facilitate active and sustainable travel to improve air quality and the health and wellbeing of our communities
- The need to adapt our town centres to the challenges of Covid-19 and the rise of online shopping, and promote the growth of our tourism, cultural and creative sectors
- The need to significantly improve digital infrastructure and mobile connectivity to support economic growth and the shift to working from home
- The need to protect and enhance our valued natural and historic environment while facilitating growth and change

You can read all the responses to the issues consultation in Appendix 1.

3. Options Consultation (2021)

Feedback submitted in response to the issues consultation was used to develop a draft vision for the district and a set of options for different growth strategies and policy approaches for the new Local Plan.

Consultation on the draft district vision and Local Plan options took place between 4 June and 9 August 2021, seeking views on which of the options people thought were more appropriate and why.

This consultation comprised a set of online forms (one for each chapter of the draft document), paper copies of which were available on request. Written representations were also welcomed.

The options consultation received a total of 770 responses, comprising 602 survey forms and 168 written representations. These 770 responses contained a total of 5,091 individual comments.

A number of events were also held as part of the options consultation:

- Local Plan Options Conference - 23 June 2021 (attended by over 70 delegates from local organisations, statutory bodies and developers)
- Secondary School Conference - 13 July 2021 (attended by Barton Court, Canterbury Academy, Herne Bay High, Langton and Spires schools)
- Disability Advisory Panel meeting - 10 June 2021 (DAP acts as a consultative group in relation to the provision of inclusive and accessible services, feeding into city council consultation exercises, communications, policy and service reviews and key projects)

The table below sets out some of the key pieces of feedback received and how the council used this to inform the development of the Draft Canterbury District Local Plan to 2045 .

| Consultation feedback | How the council used this |
|--|--|
| 60.4% support improving the local transport network to improve air quality | The Draft Canterbury District Local Plan to 2045 included a strategy and a range of policies to create a transport network with a focus on low-carbon travel to improve air quality and people's health while ensuring excellent access to city and town centres on foot, cycle and by public transport including through intelligent transport systems. |

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| <p>58.8% support enhancing our heritage and culture</p> | <p>The Draft Canterbury District Local Plan to 2045 included a strategy and a range of policies to protect and improve our rich and distinctive heritage and culture, including within the city centre, enhancing character, setting, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses.</p> |
| <p>76.0% support protecting the environment, supporting wildlife and biodiversity</p> | <p>The Draft Canterbury District Local Plan to 2045 included a strategy and a range of policies to protect and enhance our rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities.</p> |
| <p>68.2% support reducing the impact of climate change</p> | <p>The Draft Canterbury District Local Plan to 2045 included a range of policies to reduce the causes of and adapt to climate change by ensuring all district development enables carbon emissions reductions and increased resilience as quickly as possible.</p> |
| <p>No option has a majority support however we will need to plan for at least the minimum number of new homes set by the government. Canterbury Focus A (9,000 homes) is favoured more than the other options, followed by Coastal Focus and New Freestanding Settlement:</p> <ul style="list-style-type: none"> ● Canterbury Focus A: 27.5% agree and 32.9% disagree ● Preferred option: 10.3% agree and 66.8% disagree ● Canterbury Focus B: 8.6% agree and 65.8% disagree ● Coastal focus: 21.8% agree and 29.4% disagree ● Rural focus: 12.9% agree and 48.0% disagree ● New freestanding settlement: 19.4% agree and 34.2% disagree | <p>The Draft Canterbury District Local Plan to 2045 proposed Canterbury urban area as the principal focus for development, with Whitstable and Herne Bay urban areas the secondary focus for development, a new freestanding settlement at Cooting Farm, Adisham Road and smaller scale development at the most sustainable rural settlements.</p> |
| <p>Strong disagreement on the principle of planning for more than the minimum number of homes:</p> | <p>The government sets a minimum housing target per year which we are required to meet. The Draft Canterbury District Local Plan to</p> |

| | |
|--|---|
| <ul style="list-style-type: none"> ● 231 comments saying the preferred option pushes for too many homes to be built ● 113 comments that Canterbury Focus B pushes for too many homes to be built | <p>2045 set out development allocations to meet that need in full between 2020 and 2045 but did not propose higher levels than the minimum number set by the government. This included affordable housing, older persons housing and a range of sizes and types of housing to meet local needs.</p> |
| <p>Lots of objection to Duke’s Meadow link (232 comments) but limited objection to eastern bypass (8 comments)</p> | <p>The Draft Canterbury District Local Plan to 2045 did not propose a link road through Duke’s Meadow - this potential scheme was superseded by an upgrade at Rough Common Road, which KCC Highways agreed as an effective alternative. An eastern movement corridor was proposed and the Draft Canterbury District Local Plan to 2045 included policies to ensure this delivery.</p> |
| <p>Strong support for active travel and public transport (60.5% in agreement)</p> | <p>The Draft Canterbury District Local Plan to 2045 included a strategy and a range of policies to improve public transport across the district, as well as investment in walking and cycling routes to improve air quality and support good health and wellbeing.</p> |
| <p>Need to protect and enhance our green spaces e.g. AONB, green gaps, parks (76.1% in agreement)</p> | <p>The revised draft district vision in the Draft Canterbury District Local Plan to 2045 included an additional section as below:</p> <p><i>A thriving environment</i></p> <p><i>Significant new areas of accessible, high-quality open space will be created across the district and both new and existing valued open spaces enjoyed by the district’s residents will be protected for future generations, ensuring continued access beyond the period of the plan.</i></p> <p><i>Our important habitats and landscapes will be restored and enhanced, supporting the recovery of nature and increasing biodiversity.</i></p> <p><i>Opportunities for nature-based responses to climate change and other environmental challenges will be maximised.</i></p> |

| | |
|--|--|
| | <p><i>Significant investment in our water environment and infrastructure will improve river and coastal water quality, provide a resilient water supply and minimise flood risk.</i></p> <p>The Draft Canterbury District Local Plan to 2045 also included a strategy and a range of policies to protect and enhance our valued landscapes, public open spaces and green gaps.</p> |
|--|--|

You can read all the responses to the options consultation in Appendix 2.

4. Consultation on the draft Local Plan (2022/23)

Consultation on the Draft Canterbury District Local Plan to 2045 (Regulation 18) took place between Monday 24 October 2022 and Monday 16 January 2023.

A total of 2,057 responses were received from individuals and organisations, comprising 24,099 individual representations on specific policies across the whole Local Plan.

Some 1,337 questionnaire responses were received through the online survey and 720 responses were received in writing, such as via email or letter.

Respondents were asked what changes they thought should be made to individual policies and were invited to share any other comments they may have had.

In addition to the questionnaire, other methods were used to seek views on the draft Local Plan. These included:

- public drop-in events in the following locations:
 - Canterbury (Wednesday 16 November 2022)
 - Whitstable (Tuesday 6 December 2022)
 - Herne Bay (Wednesday 23 November 2022)
- a meeting with all parish councils in the district (Wednesday 2 November 2022)
- dedicated meetings with parish councils, as below:
 - Hoath Parish Council (Monday 5 December 2022)
 - Adisham Parish Council (Monday 12 December 2022)
 - Wickhambreaux Parish Council (Friday 16 December 2022)
 - Bridge Parish Council (Monday 9 January 2023)
 - Fordwich Parish Council (Wednesday 11 January 2023)
 - Womenswold Parish Council (Friday 13 January 2023)
 - Littlebourne Parish Council (Wednesday 18 January 2023)
- dedicated briefings with amenity groups, business community and groups, as below:
 - Canterbury Society (Tuesday 15 November 2022)
 - Business Improvement District (BID) (Wednesday 16 November 2022)
 - ACRA (Monday 21 November 2022)
 - Whitstable Society (Tuesday 29 November 2022)
 - Spokes (Wednesday 30 November 2022)
 - C4B (Tuesday 6 December 2022)
 - Disability Advisory Panel (Wednesday 7 December 2022)
 - CAST (Tuesday 13 December 2022)
 - St Michael's Road Area Residents' Association (Wednesday 21 December 2022)

- a meeting with Kent County Council councillors (Tuesday 8 November 2022)
- a meeting with local MPs, Rosie Duffield and Sir Roger Gale (Friday 11 November 2022).

4.1. Summary of findings

The below sets out the key pieces of feedback received and how the council has used this to inform the development of the Draft Canterbury District Local Plan (2040).

You can read a more detailed summary of the responses in the Consultation Report along with the full consultation responses received in Appendix 3.

4.1.1 Chapter 1: Spatial Strategy for the district

This chapter received a high level of feedback. Many comments related to the protection of green and open spaces in the district, with concerns raised for the loss of this as a result of the proposed housing figures. This fed into a desire to see increased biodiversity commitments throughout the Plan. Other comments highlighted the need for improved infrastructure, specifically in relation to public transport, sewage and water supply to support future development. Many respondents commented on Policy SS4 (Movement and transportation strategy for the district) in particular, raising concerns for the proposed Canterbury Circulation Plan and Eastern Movement Corridor. There was an overall feeling that this would not solve traffic congestion and instead, increase pollution and make journey times longer.

The Draft Canterbury District Local Plan (2040) responds to these concerns through the removal of the Canterbury Circulation Plan and the Eastern Movement Corridor. Although the revised plan still meets government housing targets, the plan period has been reduced to reflect the minimum 15 year requirement and therefore fewer homes are now proposed on greenfield land. Climate change policies have been strengthened and the council will publish a Sustainable Design Guide to provide additional guidance to developers on meeting design requirements. The revised policies will be subject to further consultation with communities and stakeholders and any further comments considered ahead of Regulation 19 stage.

4.1.2 Chapter 2: Canterbury

An overwhelming number of responses were received for Chapter 2. As with the previous chapter, many opposed the Eastern Movement Corridor with comments around the impact on Chequer's Wood and Old Park Site of Special Scientific Interest coming to the fore. Many respondents objected to the zoning proposals too, considering the restriction of movement counterproductive. While there was some support for development at Merton Park, considering the proposed new

sports provisions, the most frequent issues raised were around the loss of greenfield land. Respondents felt that this would impact biodiversity and that the loss of agricultural land would increase food insecurity.

The Draft Canterbury District Local Plan (2040) responds to these concerns through the removal of the Canterbury Circulation Plan and the Eastern Movement Corridor. The draft Transport Strategy sets out an alternative approach to managing the transportation issues in the district and is also published for consultation. The site allocations at East Canterbury, which would have delivered a significant proportion of the EMC, have been deleted from the draft plan. The revised policies will be subject to further consultation with communities and stakeholders and any further comments considered ahead of Regulation 19 stage.

4.1.3 Chapter 3: Whitstable

The chapter set out the strategic policy framework for development in the urban area of Whitstable and included site allocation policies including a strategic development area to the south of Whitstable and a new secondary school at Chestfield. With this in mind, most comments centred around Brooklands Farm, Golden Hill and Bodkin Farm. Respondents raised issues around the need to retain Green Gaps and avoid urban sprawl. They also highlighted the need to improve community infrastructure such as health care. For both Policy W5 (Land at Brooklands Farm) and Policy W8 (Bodkin Farm), transport impacts were raised. Respondents felt that improvements to walking and cycling are imperative.

The Draft Canterbury District Local Plan (2040) responds to these concerns through the removal of the site allocation at Golden Hill which is considered to be a key area of green infrastructure which contributes to local character along the Thanet Way A2990. The site allocations at Brooklands Farm and Bodkin Farm have been retained as they remain in line with the spatial strategy for the district, and will deliver significant infrastructure improvements for the area. The revised policies will be subject to further consultation with communities and stakeholders and any further comments considered ahead of Regulation 19 stage.

4.1.4 Chapter 4: Herne Bay

The main issues highlighted during consultation were around traffic and congestion associated with the proposals for a new secondary school on Thornden Wood Road. Others commented on the need to protect the Green Gap between Herne Bay and Whitstable, and the preservation of the existing natural landscape. That being said, there was general support for the creation of new schools in the area with many respondents recognising a need for them. A similar level of support was also seen for Policy HB1 (Herne Bay Town Centre Strategy) with respondents seeing regeneration as a positive step for Herne Bay.

The site allocation at Thornden Wood Road has been retained as it remains in line with the spatial strategy for the district, and will deliver significant infrastructure improvements for the area. The revised policies will be subject to further consultation with communities and stakeholders and any further comments considered ahead of Regulation 19 stage.

5.1.5 Chapter 5: Rural Areas

This chapter included site allocation policies at a number of the district's most sustainable rural settlements. In response to Chapter 5, overwhelming opposition was seen for Policy R1 (Land at Cooting Farm) with respondents citing concerns over the natural environment, landscape, protection of heritage assets, pollution, and the wider community's wellbeing. Comments were also made around inadequate local infrastructure.

For Policy R2 (Rural service centres), respondents objected to proposed development. They cited the inadequacy of existing community facilities and loss of character to existing settlements as reasons for this.

For Policy R21 (Local service centres), respondents felt that settlements had been incorrectly categorised. Particularly in the case of Adisham, Hoath and Wickhambreaux; comments highlighted that they should be classified as 'Villages' instead.

The Draft Canterbury District Local Plan (2040) responds to these concerns through the removal of the site allocation at Cooting Farm and the removal of other rural site allocations where technical constraints remain unresolved. The council has reviewed and updated the Rural Settlement Study to ensure that the settlement hierarchy is informed by up-to-date evidence. The revised policies will be subject to further consultation with communities and stakeholders and any further comments considered ahead of Regulation 19 stage.

4.1.6 Chapter 6: District-wide Strategic Policies

This chapter included key strategic policies on a wide range of matters. These included matters such as housing and new communities, employment and the local economy, movement and transportation, and open space, natural and historic environment.

Many challenged the national definition of 'affordable housing', with these comments stressing the need for social housing provision and affordability for local people - specifically, first time buyers. Policy DS6 (Sustainable design) also received numerous comments with some challenging the council's proposed net zero policies, suggesting that these should align with the government's targets instead. Others felt that solar panels and electric vehicle charging should be mandatory.

Regarding employment and local economy, comments on Policy DS9 (Education and associated development) raised the view that the University of Kent's southern slopes should be protected from development.

Respondents who commented on DS13 (Movement hierarchy) took the opportunity to highlight the need for better transport in the district. There was strong support for low carbon journeys but improved public transport was cited as imperative to facilitate this ambition. High quality walking and cycling routes were also said to be urgently needed.

Those who responded on Policy DS19 (Habitats, landscapes and sites of local importance) advocated for the protection of open spaces and undeveloped land. Old Park and Chequers Wood were cited in particular, with improving habitats and connectivity at the heart of much of this feedback. A clear push to protect Blean Woods, in addition to Old Park, was also seen within comments on Policy DS21 (Supporting biodiversity recovery). Some opposition to the proposed 20% biodiversity net gain could be seen with suggestions that this target should be aligned with government requirements.

The Draft Canterbury District Local Plan (2040) responds to these concerns by strengthening policies and/or the underpinning evidence base where necessary. The revised policies will be subject to further consultation with communities and stakeholders and any further comments considered ahead of Regulation 19 stage.

4.1.7 Chapter 7: Development Management Policies

There was general support for the various policies that made up Chapter 7. Comments suggested support for the designation of 'dark sky zones' in Policy DM18 (Light pollution and dark skies). There was also general support for Policy DM17 (Noise pollution and tranquillity) with many respondents encouraging the council to designate specific areas of the district as 'tranquil zones'. Finally, people felt that the council's expectation on all developments to integrate sustainable drainage systems was a positive step with comments stating that they would like to see this take place during the early stages of development.

The Draft Canterbury District Local Plan (2040) responds to these concerns by strengthening policies and/or the underpinning evidence base where necessary. The revised policies will be subject to further consultation with communities and stakeholders and any further comments considered ahead of Regulation 19 stage.

You can read a more detailed summary of the responses in the Consultation Report along with the full consultation responses received in Appendix 3.

5. Consultation on the draft Local Plan (2024)

Subject to permission to consult being granted by Cabinet on Monday 11 March 2024, consultation on the draft Local Plan is scheduled to take place from Monday 11 March 2024 to Monday 3 June 2024.

In line with the adopted Statement of Community Involvement, this will take the form of an online questionnaire, paper copies of which will also be made available. Written representations will also be welcomed.

The consultation will be widely publicised on the council's newsroom website and social media channels, plus through press releases sent to the local media.

A number of consultation events are also planned, including drop-in sessions in Canterbury, Herne Bay and Whitstable for members of the public to ask questions about the draft plan before forming their response. A number of dedicated briefings with parish councils, amenity groups, the business community and groups with an interest in transport issues, among others will also take place during the consultation period.

5.1. Local Plan 2040 - at a glance

The key differences proposed between this draft and the last can be summarised as:

- the plan period being reduced from 2045 to 2040/41
- a fall in the number of new homes proposed by a total of 4,149 - from 13,495 to 9,346 over the life of the plan
- removal of the proposed new settlement at Cooting Farm near Adisham
- removal of the strategic sites to the east of Canterbury
- removal of the proposal for an Eastern Movement Corridor, better known as the Eastern Bypass
- removal of the proposed Canterbury Circulation Plan which contained the suggestion that the city should be split into zones.

The following proposals have been added or strengthened to the draft:

- preventing climate change and boosting biodiversity put even more firmly at the heart of the plan
- supportive policies for Blean Woodland and Old Park

- a transport strategy that now focuses on better bus services as well as the promotion of walking and cycling to help to persuade people to leave their cars at home
- brownfield development sites such as Wincheap now prioritised
- a new freestanding settlement on University of Kent land to the north of the city
- a renewed emphasis on monitoring, compliance and enforcement.

Appendices

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 - Appendix 2.2.4: Movement
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