Draft District Vision and Local Plan Options 2021

Response from St Stephens Residents Association committee

(Jennifer Holland 04.08.21 on behalf of SSRA)

The district vision by 2040

A strong and resilient economy

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

Growth centred on Canterbury

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

Healthy communities

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

Improved connectivity

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

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

- ❏ Strongly agree
- ❏ Agree   √
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

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

The paragraph about 'A strong and resilient economy should have an additional phrase *'that will contribute to increased retention of young people'* following the sentence about 'highly skilled jobs…….stimulated through growth and development of the universities and the strong medical sector.' Retention of young people from the universities is currently very low due to lack of job availability and proximity of London where there are more opportunities.

Under 'Healthy Communities' there should be some reference to public transport use. i.e. 'Investment in digital infrastructure, *'public transport'* and walking and cycling routes will have helped to improve air quality*…..*

Strategic objectives

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

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

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

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

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

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

Support the growth and development of our universities as a centre of innovation and learning excellence, which will help create business start-ups and skilled jobs

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

Create a transport network with focus on low carbon travel to improve air quality and people's health, make sure there's excellent access to city and town centres, including through intelligent transport systems

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

Take advantage of, and improve, our links to and from London and the continent, while creating a local transport network which means most residents can access their day-to-day needs within 15 minutes through healthy, environmentally friendly journeys

Select an option:

- ❏ Strongly agree √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

Support the sustainable growth of our rural communities with affordable housing, community facilities and transport, and take advantage of opportunities to grow the rural economy

Select an option:

- ❏ Strongly agree √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses

Select an option:

- ❏ Strongly agree √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

Exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses, and ensure the critical infrastructure is delivered at the right time to support development

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

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

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

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

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

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

Select an option:

- ❏ Strongly agree   √
- ❏ Agree
- ❏ Neutral

❑ Disagree

❑ The

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

Everything outlined in the Local Plan should, of course, link back to the district vision and strategic objectives, providing the key information about how these objectives will be achieved. However there appears to be insufficient detail in the document as it stands at the moment to enable a clear understanding of how the draft district vision will be delivered i.e. How will high value jobs be created? What will be the driving forces to create a thriving economy? What is meant by 'intelligent transport systems'? Are the strategic objectives consistent with the KCC vision and strategies for East Kent? Have neighbouring proposals and local plans including the congestion created been taken into account? These issues and other important details are not mentioned. It seems that insufficient evidence is provided through the options consultation and supporting documents to ensure certainty that strategic objectives will be achievable. There is particular doubt around whether the preferred growth option will be able to 'Create a transport network with a focus on low carbon travel to improve air quality and people's health, make sure there's excellent access to city and town centres etc'

Under the objective about creating accessible, vibrant town centres, some reference could be made to open spaces i.e. ' Create accessible, vibrant town centres, maximising digital connectivity and '*safe, green and healthy open spaces'* for residents, visitors and businesses.

Growth options

The preferred option

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

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

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

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

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

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

Select an option:

- ❏ Strongly agree
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree √

Other options

Canterbury focus A

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

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

Select an option:

- ❏ Strongly agree
- ❏ Agree √
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

Canterbury focus B

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

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

Select an option:

- ❏ Strongly agree
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree √

Coastal focus

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

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

Select an option:

- ❏ Strongly agree
- ❏ Agree
- ❏ Neutral √
- ❏ Disagree
- ❏ Strongly disagree

Rural focus

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

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

Select an option:

- ❏ Strongly agree
- ❏ Agree
- ❏ Neutral
- ❏ Disagree √
- ❏ Strongly disagree

New freestanding settlement

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

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

Select an option:

- ❏ Strongly agree √
- ❏ Agree
- ❏ Neutral
- ❏ Disagree
- ❏ Strongly disagree

Are there any other growth options we should consider?
- ❏ Yes √ Please see comments below

❏   No

<div align="center">Growth Options</div>

A combination of features identified in two options, Canterbury Focus 'A' and a new freestanding settlement would allow sufficient new homes to be built to meet government targets of 9,000 homes using existing brownfield sites spread across the whole Canterbury district plus a newly built garden town outside the city. Canterbury City Council's preferred option refers to an additional 14,000 to 17,000 homes in Canterbury by 2040 to facilitate extra investment in the local transport network enabling through traffic to bypass the city by both Eastern and short Western bypasses paid for by section 106 funding. However, the draft plan provides no costings, traffic analysis or route map to support the case for the preferred option. It could result in a great deal of additional housing in Canterbury with consequent loss of green open space, an increase in traffic and pollution without the additional infrastructure to meet local needs. Also, the figures on which this calculation is based are controversial since ONS data have recently been scrutinised by the Office for Statistics Regulation, who have produced a report that challenges the forecast figures. It would be helpful to be given accurate and more up to date data to justify housing need including extra detail on aspects such as how waste and sewage disposal would be dealt with. At the moment, it appears that the estimates of the number of houses to be built as part of the preferred option are based on the amount of funding needed from section 106 money to provide the infrastructure improvements needed to fund that option. This could create a viscous circle that spirals out of control without ever achieving the strategic objectives already discussed when traffic from the newly built housing congests the proposed new bypass roads.

Diagrams that illustrate Canterbury City Council's preferred option and 'Option B' indicate a short stretch of new road linking the A2 and Whitstable Road. Despite the Local Plan's proposals to protect the historic and natural environment and enhance biodiversity, building this stretch of road would destroy an area of ancient woodland, remove wildlife habitats and permanently damage a special area of conservation and scientific interest. This preferred option would also undermine Climate Change Action plan objectives to reduce carbon emissions and improve air quality in Canterbury. The Transport Modelling Report for the Local Plan (May 2021), p145-148 shows the traffic flow from this proposed Western bypass continuing along Giles Lane and through the University, which immediately conflicts with the University Masterplan which identifies pedestrianisation of the campus heart as a priority. Traffic would no doubt continue via St Stephens Hill to St Stephens Road, a residential road with one narrow pavement already

crowded with children and families accessing three local schools at certain times of the day. St Stephen's roundabout at the junction of Kingsmead Road and Broad Oak Road is at capacity, over-congested and still yet to cope with additional traffic from the Riverside development when it opens.

A study of 86 road schemes by Transport for Quality of Life and CPRE found that the benefits from road building are smaller than thought and the harm much worse. Research studies have demonstrated that traffic increased more rapidly in those areas with new roads. However a new freestanding settlement developed sustainably in a location such as between Hersden and Upstreet could include a new station on the main Hi-speed route to London and be built with all the infrastructure needed, without the constraints of a historic environment. This option would avoid the need for building a new bypass to the north west of the city, while opportunities could be investigated by Canterbury City Council for developing this as a joint project with a neighbouring Local Authority. However, there is a notable omission from the evidence provided in that the Jacobs Transport Modelling report does not assess the 'New freestanding settlement' option. It is interesting to note that <u>decreasing</u> road capacity rather than increasing it, reduces demand on roads and induces transfer to other modes of transport. (London Transport and Department for Environment) This suggests a need to focus park and ride facilities on feeder roads into the city accompanied by traffic restrictions in the city centre and improvements in local public transport networks rather than building new roads.

Town centre strategies

Canterbury city centre vision and objective

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

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

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

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

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

Canterbury city centre objectives

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

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

- ❏ Yes .. √
- ❏ No

Do you have any different suggestions?

A recent report published by Harper Dennis Hobbs, retail professionals, identified Tenterden as the third best shopping centre in the UK, followed by Sevenoaks. These are both towns whose attraction for the shopper is related to the availability of a variety of small independent shops, located in a green and attractive environment. This suggests that some reference should be made to shaping Canterbury for the future as an *'exciting multi-cultural environment offering a wide range of independent small businesses.'* Canterbury already has a huge variety of small shops run by communities from different ethnic backgrounds. A focus on multicultural diversity as a feature of the city could attract new visitors.

Housing and new communities

Meeting housing needs

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

How should we do this?

- ❏ Option HNC1A - continue current approach to allow some flexibility for developers to provide a mix of homes within a broad range
- ❏ Option HNC1B - set specific housing mix targets which each site must deliver, based on the identified needs for size, type and tenure, across different parts of the district
- ❏ Option HNC1C - (preferred option) - set specific housing mix targets which each site must deliver and identify opportunity sites for specific types or tenures   √

Tell us why you chose this option (types of housing):

This option appears to offer most flexibility to meet identified needs i.e. The economic impact of covid 19 is leading to a greater demand for social housing and good quality, affordable rented accommodation since many local people are not able to afford to live in new homes being built.

The Council should encourage and actively promote schemes such as self-build homes and shared ownership. All new housing developments should include affordable housing, protected in perpetuity, with cost defined by average local incomes. Opportunities could be identified to

locate small or medium sized developments containing a high percentage of affordable homes for local people close to business innovation centres that provide support and training for employment.

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

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

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

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

Use of a more proactive approach to identifying opportunities for small and medium sites could help to meet the need for an increase in availability of affordable housing in Canterbury. This approach could encourage redevelopment of commercial sites into mixed use development proving opportunities for jobs and employment alongside housing

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

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

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

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

A stronger focus on brownfield and regeneration development could help to avoid unnecessary use of greenfield sites on high quality agricultural land that should be retained to help tackle climate and nature emergencies. For example opportunities could arise to redevelop parts of

the Wincheap Industrial estate to provide a mixture of small businesses, housing and green open spaces that would create a much more attractive environment in that part of Canterbury than is currently in place.

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

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

- ❏ Option HNC4A - continue current approach of influencing site density through good design
- ❏ Option HNC4B - identify a minimum density for the district as a whole, and continue the current approach of influencing site density through good design
- ❏ Option HNC4C (preferred option) - set specific densities, or a range of densities, for areas of the district to make best use of the land. Site allocation densities would be influenced by the local distinctiveness and character so that housing fits in with surroundings   √

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

An increase in housing density in appropriate locations should be seriously considered in order to help meet government housing targets and avoid unnecessary development of greenfield sites. This approach could provide additional benefits such as a reduction in surface water run off compared to developments with a lower housing density. Ensuring quality of design would be important and CCC might like to research examples of successful developments in other cities where housing has been designed to fit in with historic surroundings.

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

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

- ❏ Option HNC5A - continue existing approach to rural housing development
- ❏ Option HNC5B - focus rural housing development at the rural service centres, and support infill development at other settlements within village boundaries

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

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

Small, well designed developments close to local centres and villages are needed to provide affordable housing for young people who might be employed in low paid jobs or who wish to continue living in or near to an area where their families are located. Developments of this type could help to reduce environmental pollution created by cars travelling long distances to transport people undertaking local jobs.

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

Community infrastructure and design

Issue HNC 6 How can we support sustainable living in new communities?

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

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

❏ Option HNC6C - (preferred option) set clear requirements for new or improved social and community infrastructure to be delivered as part of strategic developments, and large developments must show that essential services can be accessed within 15 minutes walking or cycling time √

Tell us why you chose this option (sustainable living):

The successful development of sustainable communities would benefit from requirements that ensure availability of new or improved social and community infrastructure, for example new housing developments in rural locations should be built on a small scale with supporting shops and services that eliminate the need for residents to travel frequently to large shopping centres. Sustainable living for residents in larger housing developments could be ensured by the

development of clear requirements around the levels of essential services that should be available locally, so this approach needs to be considered. The contents of requirements for essential service could be put together in consultation with members of local communities that involved local residents associations.

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

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

- ❏ Option HNC7A - keep current criteria based approach to design
- ❏ Option HNC7B - use the new National Design Guide and National Model Design Code
- ❏ Option HNC7C (preferred option) - embed master plans and design requirements for strategic development sites within the Local Plan, and continue current design criteria based approach for other sites and types of development; setting out when specific design tools like design codes should be used   √

Tell us why you chose this option (design quality):

The absence of detail around proposed developments that might become part of the Local Plan has already been commented on which could be rectified by embedding master plans and design requirements in the plan.

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

Issue HNC8. How can we deliver low carbon and energy efficient housing?
How should we do this for new homes?

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

Tell us why you chose this option (low carbon new homes):

Net zero emissions standards for new homes will be essential for tackling climate change.

If you think there's a better option for low carbon new homes, let us know:

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

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

- ❏ Option HNC8D – require planning applications to have an energy plan for improvements to energy performance
- ❏ Option HNC8E – apply the requirement to meet Building Regulations Part L energy standards to changes to buildings to all but the smallest extensions, and require planning applications to have an energy plan for improvements to energy performance √
- ❏ Option HNC8F – (preferred option) set higher local domestic build energy standards for changes to existing homes, and require planning applications to have an energy plan for improvements to energy performance √

Tell us why you chose this option (low carbon existing homes)

Recommendations in the document 'Development options carbon emissions' are excellent i.e. Implementing policy for planned developments to evaluate the embodied carbon emissions and introduction of net zero operational emissions standards for new development in the district. Option HNC8F would encourage the most rapid improvement of the district's existing building stock to reduce energy use which would help progress towards net zero carbon emissions goals. However the technology involved in using energy pumps is new and there are questions about how many of the older properties in Canterbury would be able to install heat pumps to replace gas boilers when there is insufficient available and accessible outside space to do this. There needs to be an alternative option to replacing gas boilers to reduce carbon emissions such as adapting gas boilers to use hydrogen, for which the technology is not yet available.

If you think there's a better option for low carbon existing homes, let us know:

Improving water efficiency

Issue HNC8. How should we improve water efficiency?

❏ Option HNC8G - continue with the current approach to water efficiency

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

❏ Option HNC8I - (Preferred option) blended approach to require proposals for new homes to show the higher water efficiency standard, and for large or strategic sites to exceed the current building regulations   √

Tell us why you chose this option:

Reducing allowable maximum daily usage of water to 110 litres per day would definitely help reduce overall water consumption, but further information is required in the plan about how this regulation would be achieved and enforced. The building of a new reservoir at Broad Oak that has been considered for many years would help address water supply issues for the district and should be referred to as a desirable and important infrastructure improvement in the context of the local plan that would help to address water shortages . A new reservoir would also provide additional leisure opportunities to benefit local communities but presents issues around how its development would be funded.

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

Incorporating renewable energy into new developments

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

How will we incorporate renewable energy into new developments?

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

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

Tell us why you chose this option:

Setting standards for designing and constructing new large and/or strategic developments to maximise renewable energy generation should lead to further reduction in carbon emissions which is essential to address climate change. These requirements could also have an impact on improving design quality of buildings with greater consideration of the importance of providing green open space.

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

Specialist housing need

Issue HNC9 - How should we approach providing housing for older people?

- ❏   Option HNC9A - all large or strategic sites to provide a proportion of the site for older persons' housing (for example 5%)
- ❏   Option HNC9B - allocate specific sites for the delivery of older persons' housing
- ❏   Option HNC9C (preferred option) - provide a blended approach with a proportion of the site being delivered through large or strategic sites and allocated specific sites   √

Tell us why you chose this option (housing for older people):

Option HNC9C aims to maximise the availability of land for older person's housing developments which would help to address the identified high level of need for different types of accommodation for this group.. Ensuring that there is land available for more retirement communities would help to meet changing levels of need over time, however the funding of social care remains an issue for many elderly people

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

Issue HNC10 -How should we approach providing accessible and disability-friendly homes?

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

❏   Option HNC10C (preferred option) - require around 15% of new properties to be built to M4 (2) standards, and around 5% to be built to M4 (3) standards on major developments and strategic sites, to better reflect the needs √

Option C reflects the level of needs identified in the HNA which makes sense, however this depends on when the HNA was undertaken. This makes it difficult to judge whether option C is actually the best option as the proportion of elderly people in the population who may have increased need for wheel chair access as they get older, is constantly increasing.

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

How and where should we provide opportunities for new student accommodation?
❏   Option HNC11A - keep current approach to purpose built student accommodation
❏   Option HNC11B - provide purpose built student accommodation only on or near campus, for example within a 5-10 minute walk of the campus
❏   Option HNC11C (preferred option) - provide purpose built student accommodation on or near campus, for example a 5-10 minute walk of the campus, but also have some flexibility on alternative locations subject to strict criteria √

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

A surplus of purpose built student accommodation and HMO's in Canterbury has changed the profile of the local community to the extent that several former popular areas of family housing have been lost (i.e. Hales Place estate). Local residents still living in these areas, especially those who are elderly, do not feel very comfortable surrounded by HMOs, or when visiting the city centre, so it would be a welcome trend to free up student homes for returning to young families. Although the student population of Canterbury has not been too affected by the pandemic, the profile of students attending the universities has changed. There are fewer overseas students now and an increase in part-time mature students wanting to access higher education who will probably continue to live at home. Parents are also more supportive post pandemic of their children attending local universities, so that there will probably be a reduced demand for purpose built student accommodation in the future.

For these reasons, all new purpose built accommodation should be designed flexibly so that it can accommodate an alternative use if needed, to meet the needs of social housing. CCC should change its policy with regard to encouraging planning applications for purpose built student accommodation in the city. It is more appropriate post pandemic for purpose built student accommodation to be located on or near campus and this should be encouraged where possible.

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

How should we provide accommodation for gypsies and travellers?

- ❏ Option HNC12A - keep current approach to meeting gypsy and traveller housing needs
- ❏ Option HNC12B - allocate new pitches (either as new sites or extensions to existing sites) to meet gypsy and traveller housing needs
- ❏ Option HNC12C (preferred option) - keep current approach and take opportunities through the Local Plan to allocate new pitches where suitable sites are identified √

Tell us why you chose this option (gypsy and traveller accommodation):

A positive and flexible approach towards those seeking gypsy and traveller accommodation is required in order to meet the needs of this neglected group.

If you think there's a better option for gypsy and traveller accommodation, let us know:

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

- ❏ Option HNC13A - all large or strategic sites to provide a proportion of plots for self and custom-built homes (for example 5%)
- ❏ Option HNC13B - allocate specific small sites (up to 10 units) for the delivery of self and custom-build housing
- ❏ Option HNC13C (preferred option) - provide a blended approach with a proportion of plots being delivered through large or strategic sites, and allocated specific small sites √

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

Option HNC13C appears to provide the most effective strategy to encourage and actively support opportunities for self and custom built housing developments which can help to address the need for affordable homes in the district.

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

Delivering infrastructure to support growth

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

- ❑ Option HNC14A - keep current approach to strategic infrastructure projects
- ❑ Option HNC14B - provide overarching general support for strategic infrastructure projects which are needed to support growth
- ❑ Option HNC14C (preferred option) - provide overarching general support for strategic infrastructure projects needed to support growth, and identify specific allocations and set criteria, for example, design for proposals where justified √

Tell us why you chose this option (strategic infrastructure)

A new hospital at Canterbury, a new secondary school on the coast and a reservoir at Broad Oak are examples of much needed infrastructure projects that would benefit from a more proactive approach by CCC to their delivery and design, in which might make it more likely that they would be approved, funded and built. Monitoring the progress and outcomes of these projects through the local plan would ensure that there is ongoing commitment to their successful delivery and that plans are made to address any issues that arise. For instance the development of 50,000 house in East Kent are currently on hold because of the predicted effects of wastewater on Stodmarsh Nature Reserve. This brings into question the need to plan for extra houses if the existing infrastructure can't deal with those that have already received planning permission. CCC will need to work with partners to find solutions to this infrastructure problem before any further commitments made in the local plan can move forward.

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

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

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

❏ Option HNC15B - (preferred option) actively support renewable or low carbon energy by removing the requirement for applicants to show need, and consider opportunities to map areas for prioritising community and utility scale renewable energy projects √

Tell us why you chose this option (renewable energy):

Option HNC15B should lead to the expansion of renewable and low carbon energy projects which are needed to help reduce carbon emissions in the Canterbury district

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

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

❏ Option HNC16A - keep current approach to infrastructure delivery

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

❏ Option HNC16C (preferred option) - set clear requirements for necessary infrastructure to provided at the right time and explore opportunities to deliver critical infrastructure ahead of development. √

Tell us why you chose this option (infrastructure right time):

It is clear from the example previously given that critical infrastructure delivery should be considered **before** developments are agreed. i.e. It isn't possible to plan for extra houses in Canterbury if the existing infrastructure for disposal of wastewater can't deal with those that have already received planning permission. As already mentioned, clear costings need to be made available in order to justify the planned construction of an eastern bypass. The 'infrastructure first ' approach would entail working with infrastructure providers, developers and national and regional agencies to ensure viability of proposed projects before final agreement for their development is made.

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

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

- ❏ Option HNC17A - keep current approach to accepting viability assessments
- ❏ Option HNC17B - no new viability evidence is accepted at planning application stage
- ❏ Option HNC17C (preferred option) - set clear and limited criteria where new viability evidence is accepted at planning application stage. √

Tell us why you chose this option (development viability changes):

Option HNC17C relates to comments made in relation to the previous option (HNC16) about an 'infrastructure first' approach needed to ensure viability of planning proposals which requires evidence to be submitted at pre-application stage with a limited amount of flexibility later in relation to factors that may have changed over time

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

Employment and the local economy

Issue EMP1 – How should we ensure that enough business space is provided in the right locations to support growth?

- ❏ Option EMP1A – Continue with current economic strategy and land allocations.
- ❏ Option EMP1B - Continue with current economic strategy and land allocations, but remove sites with significant deliverability risks
- ❏ Option EMP1C (preferred option) - - Retain the most deliverable sites from the current economic strategy and land allocations, consider mixed use development opportunities at other existing sites and potential for alternative sites more aligned to market needs; provide more flexibility for existing employment areas to grow and intensify. √

Tell us why you chose this option :

Option EMP1C refers to consideration of mixed use development opportunities which could free up brownfield sites as space for housing. More people working from home as a result of the

pandemic has resulted in changed patterns of employment and market needs that could have a positive impact on the local economy. These changed patterns might stimulate a demand for new types of office accommodation and smaller business units. A greater number of mixed use developments are needed in order to provide opportunities for jobs and employment alongside housing i.e. The Wincheap industrial estate could be redeveloped in order to provide a mixture of small businesses and housing. Setting up clusters of small businesses as 'work hubs' alongside housing would enable people to work closer to where they live.

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

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

- ❏ Option EMP2A - Identify specific opportunity sites for higher-value jobs creation, and set out detailed employment mixes for allocated employment sites
- ❏ Option EMP2B – Provide full market flexibility with identified employment sites
- ❏ Option EMP2C (preferred option) - - Provide a blended approach with specific opportunity sites identified for higher paid jobs, while enabling significant flexibility on other identified employment sites. √

Tell us why you chose this option :

Option EMP2C offers the flexibility for a variety of different employment opportunities including high value jobs to be developed on appropriate sites, but doesn't answer the question already raised about how these jobs would be created

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

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

- ❏ Option EMP3A - Continue with current approach to delivery
- ❏ Option EMP3B - Require that all strategic development sites provide serviced employment land and a delivery strategy

❏ Option EMP3C (preferred option) - Secure serviced employment land and a delivery strategy as part of strategic development sites and consider opportunities for enabling development and CCC support where employment allocations are not being delivered. √

Tell us why you chose this option *

Option EMP3C refers to development of a delivery strategy that could proactively look for funding opportunities and consider 'enabling development' to help attract new businesses to identified development sites. The Canterbury economy is currently dominated by education and tourism and needs to diversify. The content of a delivery strategy could include use of marketing to encourage businesses to move to the city by raising awareness the findings of a recent online survey by magazine 'StartupsGeek' that identified Canterbury as the best place in the UK to set up a new business with regard to factors such as internet speed, cost of office space, graduate retention rate and start up survival rate. (Reported in the Kentish Gazette 17. 09.20).

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

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

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

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

❏ Option EMP4C (preferred option) - Require all new employment developments to provide full fibre connections and be accessible by sustainable transport, and ensure that all strategic development sites (e.g. over 300 homes) incorporate some commercial development to reduce the need to travel . √

Tell us why you chose this option *

Option EMP4C could reduce car use and thus carbon emissions through requiring some business and commercial space to be made available in all strategic developments. These development sites would also benefit from improved digital infrastructure.

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

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

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

- ❏ Option EMP5C: Specify that all new commercial buildings or change of use to commercial must be designed to meet Level A or better on the Energy Performance Certificate using the Standard Assessment Procedure

- ❏ Option EMP5D: (preferred option) Net zero now. Specify that all new commercial buildings or change of use to commercial must be designed to meet an A+ Energy Performance Certificate using the Standard Assessment Procedure. √

Tell us why you chose this option

Option EMP5D requires the highest standards with regard to meeting Energy Performance targets for buildings that should prove the most effective with helping to achieve carbon reduction targets

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

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

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

- ❏ Option EMP6A - Continue with current approach to university development
- ❏ Option EMP6B (preferred option) - Align the Local Plan with the growth plans of the universities. √

Tell us why you chose this option

An effective consultation process has been undertaken by the University of Kent with local residents associations to support the development of the University's masterplan. Embedding elements of the masterplan within the local plan itself would demonstrate support by CCC of

the University's aims and ambitions expressed via its growth plan. It has already been noted under 'growth options' that proposals mentioned in CCC's Transport Modelling Report for the planned Western bypass would conflict with ambitions expressed by the University of Kent in their masterplan.

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

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

- ❏ Option EMP7A – Focus tourist accommodation within or on the edge of the town and city centres
- ❏ Option EMP7B - Focus tourist accommodation within or on the edge of the town and city centres and identify specific opportunity sites for tourist accommodation outside of the city and town centres, where justified, to support economic growth e.g. for meetings and conference accommodation
- ❏ Option EMP7C (preferred option) – Maintain support for city and town centre accommodation provision, identify specific opportunity sites elsewhere, where justified, and provide increased flexibility for tourist accommodation provision across the district, including within the rural areas, to respond to market demand. √

Tell us why you chose this option *

Option EMP7C ensures the most flexible approach to the delivery of new tourist accommodation which should be able to meet different requirements of visitors and be more likely to convert day visits into overnight stays

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

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

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

❏   Option EMP8B (preferred option) – Provide increased flexibility for the provision of rural employment within and outside of sustainable rural settlements, adjacent to existing employment sites and provide specific support to new agricultural developments √

Tell us why you chose this option

Option EMP8B reflects national planning policies that would help to meet an identified need for greater employment opportunities in rural areas. It would be helpful to know more about the specific support being offered to agricultural developments.

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

Town centres and local facilities

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

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

❏   Option TCLF1A - amend the existing hierarchy of centres   √

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

Tell us why you chose this option:

The development of large out of town shopping areas has negatively influenced the viability of shops in town centres, local high streets and small rural communities and resulted in a dependence on cars for access to shops and services that are no longer located close to where people live. This makes it very difficult for those who don't drive to be able to access certain services or purchase some goods without travelling to an out of town shopping centre by public transport. Issues then arise around how to carry bulky items that have been purchased i.e; IT and electrical equipment. Adjustment of the hierarchy given would focus future development on other retail locations that are easier to access on foot from town centres and support modal shift

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

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

- [ ] Option TCLF2A - continue with current approach to development at the out-of-town areas
- [ ] Option TCLF2B (preferred option) - provide greater flexibility for a range of uses to come forward in these areas, including residential development, and support expansion where appropriate √

Tell us why you chose this option:

Mixing both residential and commercial properties could be used to re- vitalise both town/city centres and out of town areas with a greater number of residential developments above and between commercial businesses

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

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

Wincheap, Canterbury

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

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

Zealand Road, Canterbury

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

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

St Dunstan's, Canterbury

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

Issue TCLF4 How can we best support our village centres?

- ❏ Option TCLF4A - continue with the current approach to services and facilities in the rural settlements

- ❏ Option TCLF4B - (preferred option) designate village centres to protect and improve the existing provision of services and facilities within the rural settlements √

- ❏

Tell us why you chose this option:

Option TCLF4B seems to offer what residents have expressed support for via the issues consultation

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

Movement and transport

Issue MT1 -How can we maximise active travel in the district?

- ❏ Option MT1A - continue with the current approach to safeguard pedestrian and cycle routes

- ❏ Option MT1B - all new developments must show how they will maximise opportunities for walking and cycling √

Tell us why you chose this option:

Option MT1B is the preferred of the two options offered but a great deal more than this needs to be done in order to maximise opportunities for walking and cycling in the district

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

CCC should address issues around improvement in walking and cycling infrastructure and reallocation of road space away from cars via a new Canterbury District Transport Strategy, working with KCC in partnership to introduce a 20mph speed limit to all residential streets in Canterbury . Research indicates that it is more cost effective in terms of speed reduction achieved, to introduce a 20 mph limit across a wide area, than to spend the same sum on isolated, physically calmed zones. Such a change would encourage drivers to have a different expectation about appropriate speeds at which to travel in a built up area and ensure a safer environment for, cyclists, families with children and all those people who wish to use walking

and cycling as the main way of getting around the city. CCC could look at the potential to improve air quality by introducing charges for vehicles accessing the city centre by use of a LEZ, CAZ or congestion zone which could help reduce the number of vehicles using the ring road and main feeder roads into the city and thus encourage active travel.

Promotion of active travel as a result of the coronavirus pandemic that encourages walking and cycling as preferred modes of travel and also safe social distancing requirements have highlighted how challenging walking and cycling can be along some city roads. It is therefore recommended that CCC works with KCC to review barriers to active travel in all parts of the city and find ways to ease the very real physical difficulties encountered with active travel where challenges currently exist. Priority should then be given to improving the quality of the walking and cycling environment throughout the city by means such as increased access to wide level pavements and traffic reduced areas that are safe for pedestrians and development of a segregated network of safe cycling routes. Measures should be implemented to ensure that pedestrians are safe and feel safe when walking which would involve looking at footpath design and repairs, lighting, safe crossings and reduction in air and noise pollution. These measures should be complemented by access to an improved and extended local bus services network that uses electric/hydrogen fuelled buses. It is considered to be extremely important by SSRA that reallocation of road space to develop the walking and cycling environment and improve air quality and are viewed as priorities that could be achieved without a requirement to build extra houses to fund proposed improvements.

Issue MT2. How do we enable greater use of public transport in the district?
How should we do this for road travel?

❏ Option MT2A - continue with the current approach to bus improvements
❏ Option MT2B - all major developments must show how they will maximise access to the existing local bus network √

Tell us why you chose this option (road travel):

A greater emphasis on modal shift generally, not just in connection with new developments will help to reduce carbon emissions and improve air quality across Canterbury This would require

action to address some of the perceived barriers to use of public transport as well as looking at ways to improve access to the local bus network for everyone

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

Making it easier and more convenient for people to use buses and other forms of public transport could influence modal shift in a positive way. The Government's new National Bus Strategy (NBS) suggests a way forward, explaining that *'To make buses an attractive alternative to the car they need to be greener, more accessible and inclusive by design, better to ride in and easier to use, more frequent, faster and more reliable, cheaper and in a more comprehensive network, which is better integrated with other modes and each other, and which is easier to understand, innovative and seen as a safe mode of transport'*. The NBS requires Local Transport Authorities to set up an Enhanced Partnership (or more than on Partnership) to develop a local Bus Service Improvement Plan to deliver 'An ambitious vision for travel by bus' that is able to achieve all of the outcomes described above. It is therefore suggested that the following commitment appears in the Local Plan:

CCC should draw up a local Bus Service Improvement Plan (BSIP) and scheme in partnership with KCC and bus service operators that involves consultation with a wider set of stakeholders as part of an Enhanced Partnership. The BSIP should contain ambitious targets to meet objectives described in the NBS that will help improve bus services locally. These targets should be updated annually and reflected in the new Canterbury District Transport Strategy and other relevant local plans.

How should we do this for train travel?

- ❏ Option MT2C - continue with the current approach to rail improvements
- ❏ Option MT2D – (preferred option) all major developments must show how they will maximise access to rail services √

Tell us why you chose this option (train travel):

Access is not the only issue that should be considered in relation to travel by train, although this is important. Stations need to ensure safe access at all times for all customers, including disabled passengers and families with young children. It is also relevant to consider encouraging travellers to access train services by sustainable means ie. using bus services, cycling or on foot. It is

therefore important to improve integration between all forms of travel and public transport, which the government considers could be addressed through means of a local Bus Service Improvement Plan. Local stations could act as hubs for local bus services and other forms of sustainable travel such as walking and cycling, with full information displayed at stations and online about connecting services and availability of integrated, value for money digital ticketing (i.e. a new 'Kent Smartcard'). Easy to understand and easily accessible information about journey cost and options for payment should also be made available. CCC should liaise with KCC to roll out 'Mobility as a Service' which is being piloted in Ebbsfleet before being extended to the whole of Kent by 2025. This offers integrated planning, booking and payment for onward travel across a wide variety of transport modes based on a user's travel needs. Integration between services could also be improved by development of a Roper Road entrance to Canterbury West station to enable bus and taxi access to the northern side of the station and provide parking, waiting and cycling facilities that would remove the need for many cars and taxis to cross the level crossing and use Station Road West. Improved information and signage outside the station should be available to inform visitors where to catch buses to other parts of the city and innovative initiatives for visitors and residents such as tourist information and parcel collection services could also be introduced.

Issue MT3 How will we enable the rapid transition to zero emissions vehicles?

- ❑ Option MT3A - continue with the existing approach to electric vehicle infrastructure
- ❑ Option MT3B (preferred approach) - accelerated transition to zero emissions vehicles √

Tell us why you chose this option:

This option refers to a range of initiatives that will help to reduce carbon emissions including exploring the potential for a Clean Air Zone and rollout of electric/ hydrogen buses which will help to achieve Climate Change Action Plan objectives.

Issue MT4 How should we approach parking standards in the Local Plan?

- ❑ Option MT4A - continue with the current approach to parking standards
- ❑ Option MT4B - remove parking standards and adopt a more flexible approach specific sites

❑ Option MT4C - (preferred option) amend the current parking standards to significantly reduce car parking provision in the most sustainable locations and to allow for enough provision in suburban areas √

Tell us why you chose this option:

Reduction in car parking provision in sustainable locations will reduce the number of cars entering the city. To be most effective, this reduction in parking should be accompanied by development of Park and Ride service availability. These services need to intercept cars before they reach congested urban roads and should be accessible from all main approaches into a city. (i.e. Park and Ride services in cities of Oxford and York.) Canterbury is lacking a park and ride service on the northern side of the city which should be a priority for future development. The Canterbury district Bus Service Improvement Plan should also consider the potential to improve and extend local bus service networks including increasing availability of buses during evenings and at weekends. Improvement in integration with other transport modes i.e. train services should also be looked at as a priority

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

Issue MT5 - How should we approach transport assessments, transport statements and travel plans?

❑ Option MT5A - continue with the current approach to transport assessments and travel plans

❑ Option MT5B - all major developments must submit transport assessments and travel plans

❑ Option MT5C - all major developments must submit transport assessments and travel plans, with additional criteria to cover other types of development which could have significant impacts on the network, and all minor developments would have to submit transport statements √

Tell us why you chose this option:

Transport assessments and travel plans based on accurate data will help with estimation of the impact that proposed new developments will have on the environment. A reduction in vehicle use and transfer to sustainable transport modes could be achieved by requiring businesses and schools to develop travel plans.