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BY EMAIL ONLY

24 May 2024

Dear Sir/Madam,

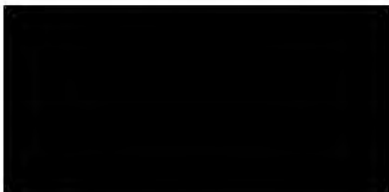
Re: Canterbury City Council Local Plan Regulation 18 Consultation

Thank you for consulting Kent County Council on Canterbury City Council Local Plan Regulation 18 Consultation.

The County Council has reviewed the documentation and has provided comments in full in the document attached.

I trust this provides our initial views on the Canterbury Local Plan and the County Council would welcome continued engagement as the Local Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,



Simon Jones
Corporate Director – Growth, Environment and Transport

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>Kent County Council (hereafter referred to as the County Council) appreciates the engagement to date with the City Council in the preparation of this draft Local Plan. The County Council provides detailed commentary within this response and looks to continue to work positively moving forward as this local plan progresses.</p> <p>The County Council welcomes acknowledgement within this Local Plan consultation document of the need to provide additional infrastructure to support the delivery of new housing. The County Council is committed to continuing to work with the City Council and other key stakeholders to ensure that sustainable growth is delivered to meet the identified housing need, supported by necessary infrastructure – that is planned for, funded and delivered in a timely manner. The County Council is therefore supportive of a Local Plan and policy drafting which highlights the need for infrastructure to be delivered ahead of development commencement and would welcome continued joint working to secure this through the Local Plan. The County Council recognises that significant levels of infrastructure will be required to ensure growth as proposed in this Local Plan will be viable and requests continued engagement with the City Council to ensure that adequate levels of funding can be secured to support the timely delivery of infrastructure.</p> <p>The County Council has provided detailed commentary in respect of the proposed policies throughout this response and would welcome continued engagement to resolve matters raised ahead of the Regulation 19 consultation and support the delivery of the Local Plan. However, traffic modelling outputs remain outstanding and these need to be completed in order for the County Council to fully understand the impact of proposals and how effective the transport measures are likely to be, and what residual congestion might be expected. The County Council would urge that details and outputs of the modelling are shared with the Local Highway Authority as soon as possible to ensure appropriate measures are incorporated into the Local Plan. Furthermore, the County Council notes the aspirations for a considerable modal shift through the implementation of measures as proposed through this Plan and highlights that without the modelling, it is not possible to be satisfied as to whether the proposals are likely to be effective.</p> <p>To deliver sustainable development within Canterbury, close working and a collaborative approach with all key stakeholders will be crucial – taking in to account all necessary infrastructure and services required to deliver robust and resilient communities during the plan period and beyond, whilst also considering any cross boundary, strategic implications of growth.</p> <p>The County Council recognises that the City Council has adopted the Community Infrastructure Levy (CIL) and wishes to work collaboratively to ensure that infrastructure is funded appropriately and adequately. The County Council has been vocal in its concerns with the CIL, the processes to secure contributions and whether this mechanism is able to secure the necessary contributions to deliver necessary infrastructure. The County Council recognises that governance for administration of the CIL is currently being established and would welcome a clear role in the process to ensure required funding is secured to deliver necessary infrastructure to support proposed growth through this Local Plan and would welcome continued engagement on this matter.</p> <p>As the Local Plan progresses, the County Council would value timely engagement in the shaping and inputting, as appropriate, into the draft Statement of Common Ground to ensure that all cross-boundary and strategic matters are properly and clearly addressed.</p>
<p>1. <u>Spatial Strategy for the district</u></p>	
<p>General Comments</p>	<p><u>Public Rights of Way (PRoW)</u></p> <p>The County Council notes that individual site policies typically include a plan showing suggested 'opportunities' for improved walking and cycling, including greenways, and access connections. In all instances, the County Council expects to review site proposals and the specific 'opportunities' as they come forward at pre-application stages and may thereafter propose revision based on its understanding of local need. The County Council would therefore welcome engagement with applicants as masterplans are prepared at pre-application stages.</p> <p>The County Council is keen to engage with the City Council to ensure the establishment of principles and the provision of accessible routes, including those which may not necessarily be PRoW – this is in line with the County Council's goal of ensuring a high quality of life for residents and visitors.</p> <p><u>Minerals and Waste</u></p> <p>The County Council, as Minerals and Waste Planning Authority is of the view that very limited land-won safeguarded minerals are affected by the plan's identified areas for future development. Where there are such minerals, the draft Plan makes clear that any development proposals that may have a potentially sterilising impact on land-won safeguarded minerals will have to be assessed. The County Council would recommend the addition of a reference to Policy DM 7: Safeguarding Mineral Resources and the necessity of addressing any exemption criteria if a prior extraction of the safeguarded minerals is considered impractical, unviable etc. The City Council should also be aware that the Brickearth (Other Areas) – Ashford, Canterbury, Dover, Folkestone and Hythe is being proposed to be removed from the Canterbury City Council – Mineral Safeguarding Areas proposal map of the Kent Minerals and Waste Local Plan Full Review 2024-39. If this modification is indeed adopted, much of the safeguarded mineral coverage of the area will be removed. This will alleviate much of this constraint from this local Plan's area and many of its proposed allocations.</p> <p>In terms of safeguarded waste and mineral facilities, the main concern is that the mineral importation wharf at Whitstable Harbour is not compromised in terms of its continued lawful viable operation. The draft Local Plan proposes a Whitstable Harbour Strategic Plan, where mineral importation will be sensitively integrated into this plan. The relevant policy (Policy W2) proposes a Supplementary Planning Document (SPD) to be produced that will set out the details of the area's future development. It is recommended that the County Council is engaged and consulted with early on in the process, prior to any formal consultation on the SPD.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
<p>Vision for the district to 2040</p> <p>Strategic objectives for the district</p>	<p><u>Highways and Transportation</u></p> <p><i>Vision for the district to 2040</i> – The four headline objectives listed in the Vision are supported, and in particular the aims under the title “Improved connectivity”, which seeks to provide high-quality public transport infrastructure together with comprehensive walking and cycling routes. This is aligned with regional and national policy to promote mode shift. However, it is considered that recognition of other highway improvements to mitigate congestion on the highway network should also be given.</p> <p><i>Strategic Objectives for the District</i> – It is noted that the reference to most residents accessing their day to day needs within 15 minutes of their home and/or workplace has been omitted from the current draft of local transport objectives in this section of the document. It is therefore not clear whether the latest draft seeks a more ambitious target or less than that. Investment in pedestrian and cycle links within the existing urban areas, and through provision within developments themselves planned in and around these areas will be key to achieving the shift towards healthy journeys. Excellent access to city and town centres would focus on walking, cycling and public transport, but the latter mode will not be realised where congestion on the local highway network would also affect the movement of buses. The capacity of the highway network will also need to consider general traffic in order that congestion is kept within acceptable levels.</p> <p><u>PRoW</u></p> <p>The County Council is supportive of the references to walking and cycling, high quality open space, connections for all within and between communities, and the benefits of low-carbon travel that exemplifies the value of and reasons for providing a high-quality ProW network. Overall, in respect of ProW matters, the County Council is supportive of the draft Local Plan’s Vision and Strategic Objectives. Commentary on this draft Local Plan is focused on ensuring that the ProW network positively contributes to Canterbury’s future wellbeing.</p> <p><u>Heritage Conservation</u></p> <p>The County Council is disappointed to see that “an enhanced historic...environment” has been removed as a goal for the Vision since the previous consultation and the County Council would request that it be reintroduced. Canterbury’s exceptional historic environment is one of its greatest assets and it is essential that it is conserved, enhanced and respected if the new growth is to be embedded successfully into the urban centre. The County Council notes the vision statement that “<i>Investment in the city, our coastal towns and the rural areas will ensure the district’s historic and natural environment can thrive,</i>” however there is no guarantee through the proposed policies that it will. The previous consultation document included a commitment to enhancing the historic environment – this was considered to be much stronger than the current wording now proposed. Heritage can also play a key role in creating a thriving environment, the County Council would therefore suggest the text be modified to “<i>Our important <u>and historic</u> habitats and landscape.</i>”</p> <p>The County Council is supportive of the strategic objective of “<i>Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses.</i>” Canterbury’s heritage is essential to a wide range of aspects of life in the district and it appropriate that a strategic objective be focused on it.</p>
<p>Environmental strategy for the district</p>	<p><u>Heritage Conservation</u></p> <p><i>Paragraph 1.26</i></p> <p>The County Council welcomes the strong commitment to the enhancement of the historic environment in this section.</p> <p><i>Paragraph 1.27</i></p> <p>The County Council welcomes references made to the Heritage Strategy, and particularly the delivery plans which will need to be fully resourced if they are to be delivered.</p>
<p>Policy SS1 – Environmental strategy for the district</p>	<p><u>Highways and Transportation</u></p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>The policy requires new developments of 300 homes or more to incorporate a minimum of 20% tree coverage across the site. As the adoptable highway must be lit to specific illuminance levels and uniformity to gain technical approval, which can be impacted by the location of trees, the lighting design and calculations should be carried in coordination with the design of the soft landscaping layout. The County Council ask that this is carried out at an early stage to ensure compatibility. The County Council would ask that the adoptable highway be lit to specific illuminance levels and uniformity to gain technical approval, and ask that it is noted that the trees will impact the spread of that light. Unless the lighting design and calculations are carried at an early stage in coordination with the soft landscaping layout, it may not be possible to place trees at every position that was originally intended. The County Council would therefore ask that this is considered at an early stage.</p> <p><u>Heritage Conservation</u></p> <p>In respect of Clause 2, the County Council would draw attention to the commentary raised in respect of the Draft Canterbury District Open Spaces Strategy</p> <p>In respect of Clause 4, the County Council welcomes reference to policy DS26 – Historic environment and archaeology referred to in the Environmental Strategy. The County Council has provided commentary in respect of policy DS26 within this response.</p>
<p>Sustainable design strategy for the district</p>	<p><u>Heritage Conservation</u></p> <p>The County Council welcomes the prominence given to Canterbury's outstanding historic environment in paragraph 1.28, and the recognition both of the important role it can play and the fragility of the resource. As the text notes, high quality design is central to the conservation of the resource and to exploiting its benefits.</p> <p><i>Paragraph 1.29</i></p> <p>The historic environment has a significant role to play in the conservation of resources required for development, and also in energy efficiency. Old buildings can often be more energy efficient than newer ones and of course have already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced a range of guidance on the role that heritage can play in mitigating climate change and historic building adaptation ('Climate Change Adaptation Report' (Historic England, 2016)). The guidance demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient than more modern structures and settlements. This has also been updated in the Historic England report 'There's no Place Like Old Homes : re-use and Recycle to Reduce Carbon' (Historic England 2019). The County Council would ask that this is highlighted in the text which at present rather suggests the burden of making housing energy efficient must only be borne by new buildings.</p> <p><i>Paragraphs 1.30-1.32</i></p> <p>Connectivity of new development to existing areas can be supported by careful appreciation of the historic patterns of tracks and routeways that is provided by Historic Landscape Characterisation – the County Council has provided detailed commentary in respect of Landscape Character further within this response.</p>
<p>Policy SS2 - Sustainable design strategy for the district</p>	<p><u>Highways and Transportation</u></p> <p>New communities of more than 300 homes are proposed to contain community hubs to reduce the need to travel for day-to-day services. This is welcomed to support active travel and reduced car use, although it is questionable whether this scale of development will be able to generate sufficient demand to ensure the long-term viability of the expected facilities given challenges at other sites, such as Great East Hall in Sittingbourne and Thistle Hill, Sheppey. Transport Assessments for these developments will need to ensure robust trip rates are used in case the hubs are not sustainable.</p> <p><u>Heritage Conservation</u></p> <p>The County Council welcomes clause 2 which provides a firm commitment to Canterbury's built heritage and to its integration into areas of new build.</p>
<p>Policy SS3 – Development Strategy for the District</p>	<p><u>Highways and Transportation</u></p> <p>The general approach identified in the policy is supported, with Canterbury being the principal focus area for development in the District, and Whitstable and Herne Bay being the secondary focus. These areas of development provide the greatest opportunity to deliver strategic infrastructure to support the growth proposed here.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
<p>Policy SS4 - Movement and Transportation Strategy for the district</p>	<p><u>Highways and Transportation</u></p> <p>The goal of the movement strategy is supported in its aim to make the city centre highly accessible by public transport and active travel. However, to allow the reallocation of road space to active travel and public transport without creating unacceptable levels of congestion on the highway network, traffic will need to be adequately discouraged from being drawn into the city centre. The strategy only mentions a reduction in capacity at some city centre car parks to reduce congestion on the ring road, but it is likely that wholesale removal of public car parking will be needed to disincentivise motorists from still entering the area in search of a parking space. Greater emphasis on removing the vehicle attractors is therefore required.</p> <p>The outputs from traffic modelling to assess the impact of the proposed strategy have yet to be completed. The County Council will need to review the modelling when it becomes available before it is able to accept the strategy and measures proposed, and will continue to work with the LPA in order to develop the modelling evidence.</p> <p>Reference to the upgrades at the A2 junction at Harbledown and at Rough Common Road has been listed as a sub-paragraph within the Key Infrastructure under the bus-led strategy paragraph 2, together with a number of other measures and infrastructure that are not necessarily associated with the bus-led strategy. These items may be better listed separately from the public transport items for clarity. Furthermore, the description of upgrades is quite ambiguous and this should specify the anticipated form of upgrade to include new east facing on and off slips. In addition, paragraph 3 only describes new A299 access at Whitstable. It is considered that this could be more precisely detailed as eastbound on and off slips at Chestfield, and be included in the list of key infrastructure requirements.</p> <p><u>PRoW</u></p> <p>The County Council recommends the following amendments to ensure consideration of the PRoW network:</p> <p>Point 2(b) - <i>“The delivery of a comprehensive city-wide network of segregated cycle lanes and cycle parking infrastructure, <u>together with an enhanced PROW network</u>, with links to the coast and rural areas”</i></p> <p>Point 3 - <i>“The delivery of a coastal network of segregated cycle lanes and cycle parking infrastructure <u>and enhanced PROW network</u> will support an increase in active travel journeys, with improved connectivity to the city and rural areas.”</i></p>
<p>Policy SS5 - Infrastructure Strategy for the district</p>	<p><u>Highways and Transportation</u></p> <p>Whilst highway infrastructure is referenced in the Movement and Transport policy SS4, it would be prudent to include reference to these within Policy SS5, considering this is the policy covering infrastructure and it does not necessarily imply that it only relevant to non-highway related infrastructure.</p> <p><u>Development Investment</u></p> <p>The County Council draws attention that where strategic allocations are providing on-site schools, <i>“New and improved walking and cycling connections to school locations, both within the site and surrounding communities;”</i> are required to be provided prior to the opening of the school on-site. The County Council would request that this should be featured within each strategic allocation policy, and referred to within this overarching policy also.</p> <p><u>PRoW</u></p> <p>The County Council is supportive of emphasis of the need for new development to make provision for, or appropriate contribution towards any new or improved infrastructure needed to serve it. The County Council, in respect of PRoW matters will continue to engage with relevant applicants to ensure improvements are secured and delivered to the PRoW network.</p>
<p>2. Canterbury</p>	

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
General Commentary	<p><u>Highways and Transportation</u></p> <p>The vision for Canterbury promises significantly reduced traffic congestion through modal shift to public transport and active travel. This is a bold statement as the traffic modelling has not been completed at the time of writing to predict how effective the transport measures are likely to be, and what residual congestion might be expected. The County Council cannot support the statement until the modelling has been completed and is satisfied that the assumptions made in the evidence base for modal shift are realistic.</p>
Policy C1 – Canterbury City Centre Strategy	<p><u>Highways and Transportation</u></p> <p>A key part of the vision is to reduce traffic on the inner ring road, which linked to modal shift will require the removal of traffic attractors. At present, the existing provision of city centre car parks draw vehicles into the area but the policy does not indicate any commitment to reduce or remove the amount of public car parking available, and only mentions “measures to moderate vehicular pressure”.</p> <p>Development within this area should also be promoted as car-free where appropriate so not to generate vehicle trips that could easily be made by sustainable modes. In addition, it is considered that paragraph 9 should incorporate reference to the provision of well designed cycle storage, rather than limiting this requirement to just storage space for refuse and recycling.</p>
Policy C5 – Canterbury Urban Area	<p><u>Highways and Transportation</u></p> <p>The County Council cannot yet support the statement in paragraph 2 that the implementation of the Canterbury District Transport Strategy will lead to a significant reduction in short trips made by private car, as this will need to be evidenced through the traffic modelling currently being undertaken. Until the modelling has been completed, the predicted impact of the local plan developments and transport strategy are not known.</p>
Canterbury Strategic Development Areas South West Canterbury	<p><u>Highways and Transportation</u></p> <p>South West Canterbury SDA provides the opportunity to deliver relief to the existing A2 junction at Wincheap through the provision of the proposed Canterbury Link Road. However, paragraph 2.9 describes opportunities to deliver new and improved connectivity with the A2, but it should appreciate that the Wincheap fourth slip secured in planning obligations is committed. The proposed South West Canterbury Development area is therefore expected to amend connectivity to the A2 rather than deliver new connections, albeit relocated.</p> <p><u>PRoW</u></p> <p>Development in this location could impact Public Footpaths CB464, CC59, CB490, and CB491, also Public Bridleway CB494. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forward.</p>
Policy C6 - Land at Merton Park	<p><u>Highways and Transportation</u></p> <p>Paragraph 4 (c) of the policy requires new access both from and to the A2 to serve the site, but as noted above, the fourth slip at Wincheap is likely to be in place giving access from the A2. Flexibility in the wording would be required to ensure that site C6 does not need to provide direct access from the A2, and this can be served via appropriate connections. The modelling currently being undertaken envisages retention of the committed fourth slip and the replacement of the current eastbound on-slip to within the site. This will need to be reflected in the phasing and delivery section of the policy too.</p> <p>Phasing for the connectivity to site C7 Hollow Lane has changed from being provided prior to occupation in the earlier drafting of the plan to prior to occupation of 25% of the total dwellings. The County Council cannot confirm whether the trigger proposed is appropriate as this will need to be assessed through traffic modelling to consider the interim impact on the highway network.</p> <p><u>Development Investment</u></p> <p><i>Paragraph 4(a)(iv) “New and improved walking and cycling connections to school locations, both within the site and surrounding communities;”</i></p> <p>The County Council notes that these connections should be provided ahead of the opening of the school on site and would ask that the paragraph be amended to secure this.</p> <p>The County Council also notes that presently, the wording omits the consideration of site contributions towards provision of enhanced capacity within Kent County Council’s Household Waste Recycling, the County Council would ask that this be rectified accordingly.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p><u>PRoW</u></p> <p>Public Footpaths CB464, CC59, CB490, and CB491, also Public Bridleway CB494 all run, either in part or wholly within the site boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is also supportive of point 3(m) which seeks to conserve or enhance the ProW network across the site.</p> <p>The County Council also notes point 4(g) and raises a question given the uncertainty of the future status that may be envisaged for routes being described as “<i>non-motorised/recreational use/ access only</i>”.</p> <p>In respect of point 5, there must be a stated requirement for the phasing and delivery of the PRoW network.</p>
<p>Policy C7 - Land to the North of Hollow Lane</p>	<p><u>Highways and Transportation</u></p> <p>Terminology used in section 4 Access and Transportation should follow into section 5 Phasing and Delivery. This is needed to remove ambiguity over when the delivery of connectivity to the site is required, to ensure that both vehicular and pedestrian/cycle connectivity are accounted for.</p> <p><u>Development Investment</u></p> <p>The County Council draws attention that where strategic allocations are providing on-site schools, “<i>New and improved walking and cycling connections to school locations, both within the site and surrounding communities</i>,” are required to be provided prior to the opening of the school on-site. This should be featured within each strategic allocation policy, and referred to within this overarching policy also.</p> <p><u>PRoW</u></p> <p>Public Footpaths CB490 and CB491 run in part within the site boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the ProW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is also supportive of point 3(k) which seeks to conserve or enhance the ProW network across the site. The County Council is also supportive of point 4(a)(iv-v) which seeks improvements to the ProW and connectivity.</p> <p>In respect of point 5, the County Council would request that there must be a stated requirement for the phasing and delivery of the ProW network.</p>
<p>Policy C8 – Nackington Police Station</p>	<p><u>PRoW</u></p> <p>Public Footpath CC63 may run in part within the site boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of point 4(d) which seeks the provision of improved walking and cycling connections.</p>
<p>Policy C9 - Milton Manor House</p>	<p><u>Highways and Transportation</u></p> <p>In order to prevent the creation of a vehicular access onto the busy A28 classified road and ensure development traffic joins the A28 via the more appropriate Milton Manor roundabout, this policy should specify that vehicular access to serve the site will be taken from Milton Manor Road.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p><u>PRoW</u></p> <p>Part of Public Footpath CB464 may be impacted by the proposal. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Points 4(a)(iii-iv) which detail requirements for the access and transport strategy.</p>
<p>Policy C10 - Land to North of Cockerling Road</p>	<p><u>PRoW</u></p> <p>The County Council notes that no PRoW is affected by this proposal but Public Footpath CB464 should be identified as a potential connection. This footpath has the potential to be upgraded to Public Bridleway, allowing pedestrian, equestrian and cycle use, which would be encouraged here.</p>
<p>Policy C11 – South West Canterbury Link Road</p>	<p><u>Highways and Transportation</u></p> <p>The wording of the provision of new on/off slips on A2 Coastbound will need to reflect the comments already made above with respect to the committed fourth slip at Wincheap.</p>
<p>Policy C12 – Land north of the University of Kent</p>	<p><u>Highways and Transportation</u></p> <p>This development is required to provide an all-movement junction at A2 Harbledown through the provision of additional on and off slips. This will need to include associated widening of Faulkners Lane and junction improvements at its connection to the A2050 to accommodate the change in traffic distribution.</p> <p><u>PRoW</u></p> <p>Public Footpaths CB12, CB12A, CB14, CB25, CB30, CB31 and Public Bridleway CB24A, and possibly others, could be affected by the proposed allocation. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Points 3(f), 3(l), and 4(a)(i)-(iv) which relate to the provision of green corridors to boost connectivity, conservation of the PRoW network and the provision of an access and transport strategy.</p> <p>In respect of point 5, there must be a stated requirement for the phasing and delivery of the PRoW network.</p> <p><u>Heritage Conservation</u></p> <p>It should be noted that the site lies in an area of considerable archaeological significance with numerous historic sites and buildings being recorded on the Kent Historic Environment Record. The part of the development area lying south of Tyler Hill Road has been assessed as being of high potential for palaeolithic discoveries based on material recovered from similar terrace gravels and head deposits along the former route of the Stour. The area north of Tyler Hill Road has a moderate palaeolithic potential. Large numbers of Mesolithic flints have also been found from across the area. The main concentration of archaeological remains is in the vicinity of the church of St Cosmus and St Damian, itself a medieval listed building. To the immediate south-west of the church is the scheduled monument relating to a deserted medieval settlement. The monument includes the remains of a dispersed medieval settlement and an earlier Roman building situated on the southern slope of a clay hill around 7km northwest of Canterbury. The dispersed medieval settlement survives in the form of earthworks and associated buried remains, perhaps including the remains of a 14th century vicarage. The earthworks survive to a height of up to around 0.5m and represent three adjoining north west-south east aligned rectangular enclosures identified as a manor house complex and two associated, contemporary dwellings. Part of a roughly north-south aligned track runs along the eastern side of the monument. Documentary evidence, including an entry in the Domesday Book, suggests that the settlement was in</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>existence by the 11th century. Analysis of pottery fragments found within the settlement suggests that it had fallen into disuse by the early 15th century. To the west of the scheduled area, a geophysical survey carried out by the University of Kent in 2009 found a possible trackway related to the scheduled site. To the east of the scheduled area, extensive cropmarks including enclosures and ring-ditches have been observed covering an area of 300m x 300m. Together these suggest that the complex extends well beyond the scheduled area.</p> <p>Further east in the development area, an anti-aircraft battery and searchlight were installed during the Second World War and remains associated with these sites may yet survive. An air-raid shelter is also believed to have been constructed at Blean Primary School and may yet remain. An Auxiliary Hide is also known to have been constructed in the area and may be within the development area itself.</p> <p>In addition to the historic features within the development area there are several other sites immediately adjacent that could be affected. Hothe Court is a historic farmstead that includes two listed buildings and that dates back to the medieval period. Nearby Blean House is a 19th century residence, again listed. It should also be noted that a considerable part of the site is covered by the Hothe Court and Blean Conservation Areas.</p> <p>Clearly the proposed development has the potential to significantly impact the heritage of the area, whether by direct impact on archaeological remains or historic buildings, or on their settings. There are also undoubtedly buried remains of which we are as yet unaware. It is essential that these are treated appropriately during the development management process. Historic England should be consulted at an early stage regarding the scheduled monument and the County Council would request that we be consulted at the earliest detailed masterplanning stage too. Preliminary desk and field evaluation and a survey will also be required to clarify the archaeological significance of surviving remains and the impact of the proposals at an early stage. Further nationally important non-designated archaeological remains may well be present within the site and should be preserved in situ. Archaeological assessment and a field evaluation should be undertaken at an early stage in the design of the proposed development to ensure that areas which require preservation can be removed from the developed area and cultural heritage can be used to enhance the character and sense of place of the new development.</p>
<p>Policy C14 - Land at Station Road East</p>	<p><u>Highways and Transportation</u></p> <p>These comments relate to Policies C13 and C14 – Becket House and land at Station Road East.</p> <p>The previous draft of these site policies both had an access and transport strategy that promoted a “car free” development, but it is noted that has now been removed. Given its location close to the city centre, this is the type of site that should be encouraged to restrict parking provision, particularly as the Local Plan seeks to reduce traffic volumes using the ring road in order to tackle congestion and reallocate roadspace to public transport and active travel. It is noted that this would be in accordance with policy DS15</p> <p><u>PRoW</u></p> <p>Public Footpath CC50 may run in part within the site boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Point 4(b) and the requirements for an access and transport strategy.</p>
<p>Policy C16 - Land at Folly Farm</p>	<p><u>PRoW</u></p> <p>Public Footpath CC17 runs, in part, along the site boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Point 4 and the requirement for an access and transport strategy.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
<p>Policy C17 - Land at Canterbury Business Park</p>	<p><u>PRoW</u></p> <p>Public Bridleways CB268 (part of the North Downs Way National Trail), CB323 and CB324, and possibly others, may be affected by the proposals. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Point 4 and the requirements for an access and transport strategy.</p>
<p>Policy C18 - Land on the eastern side of Shelford Landfill</p>	<p><u>PRoW</u></p> <p>Public Footpaths CB47A and CB51 may run in part within the site boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Points 3(e) and 4(a) which relate to the conservation and enhancement of the PRoW network and the requirement for an access and transport strategy.</p>
<p>Policy C19 - Wincheap commercial area</p>	<p><u>Highways and Transportation</u></p> <p>Traffic modelling being undertaken for the Local Plan includes the western relief road, as this is expected to be necessary to divert traffic away from the A28/Ten Perch Road junction to address congestion. The concept masterplan no longer shows this route and the County Council would request that this be amended to include the link.</p> <p><u>PRoW</u></p> <p>Public Footpath CC68 runs in part within the site boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Point 4 and the requirement for an access and transport strategy.</p>
<p>Policy C20 - Land to the south of Sturry Road</p>	<p><u>PRoW</u></p> <p>The County Council notes that although the PRoW network is not affected by the proposal, Walks for All promoted route and a cycle way run through the site which require consideration at master planning stages.</p>
<p>Policy C22 – Land on the Eastern Side of Shelford Landfill</p>	<p><u>Highways and Transportation</u></p> <p>Any development of this site should provide a transport assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars. Consideration should also be given to the possibility of providing contributions towards local highway improvements supporting growth.</p>
<p>3. Whitstable</p>	

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
Policy W1 - Whitstable Town Centre Strategy	<p><u>PRoW</u></p> <p>The County Council is supportive of point 9 and the ambition to complete the Crab and Winkle Way. However, the Policy does not recognise access along and to connect with the King Charles III Coastal Path, England's newest National Trail. The County Council would ask that this be included in the policy.</p>
Policy W2 – Whitstable Harbour	<p><u>Highways and Transportation</u></p> <p>Development here has the potential to increase congestion in the town centre through attracting more vehicle movements, but the County Council is supportive of proposals to improve accessibility by walking and cycling. It is recognised that infrastructure contained with other policies will help alleviate the traffic volumes to give weight to accepting development in this location.</p>
Policy W3 - Whitstable urban area	<p><u>Highways and Transportation</u></p> <p>The inclusion within this policy for the new A299 slip roads is now noted following the comments provided for the previous draft, and this is welcomed to reinforce policies W4 and W6</p> <p><u>Development Investment</u></p> <p><i>Paragraph 6</i></p> <p>The paragraph makes reference to a “2FE Special Education Needs and Disabilities school”. 2FE is an incorrect description as special schools do not operate on this basis. At present, the size (in terms of pupils) is unknown until the school's specialism is determined. The County Council requests removal of the reference to “2FE”.</p> <p><u>PRoW</u></p> <p>In respect of point 3, the County Council recommends the following amendment: <i>“The council will seek to improve walking and cycling connectivity, such as improvements to <u>and connections with the Crab and Winkle cycle way...</u>”</i></p>
South Whitstable – strategic development area	<p><u>Development Investment</u></p> <p><i>Paragraph 6</i></p> <p>To clarify, the provision of a new SEND school is to mitigate the needs of all proposed housing growth in this draft local plan. Provision of a new facility on the coast will provide a balance of infrastructure, with existing SEND schools in and around Canterbury central.</p>
Policy 4 - Land at Brooklands Farm	<p><u>Highways and Transportation</u></p> <p>Early delivery of the east facing slips on the A299 is considered to be important in order to accommodate some level of development on this site, and to limit the impact on the local highway network. This policy seeks to deliver these highway works prior to occupation of 50% of the total dwellings but it is considered that delivery should be much earlier due to the current levels of congestion, unless traffic impact assessment can demonstrate otherwise.</p> <p><u>Development Investment</u></p> <p>Point 1.(b)(ii) references a 2FE Primary School on a 3ha site. The site size is incorrect and should be amended to 2.05ha.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p><u>PRoW</u></p> <p>Public Footpath CW21 and part of Public Footpath CW27 run within the site. Public Footpath CW27 continues immediately outside the site's eastern and northern boundaries, joining Public Bridleway CW27A that also runs immediately outside the site's northern boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p><u>The County Council is supportive of</u> Points 3(m) and 4(a)(i)-(vi) which relate to the conservation and enhancement of the PRoW network and the requirements of an access and transport strategy.</p> <p>In respect of point 5, there must be a stated requirement for the phasing and delivery of the PRoW network.</p>
<p>Policy W5 - Land south of Thanet Way</p>	<p><u>Highways and Transportation</u></p> <p>It is appreciated that this site came forward in advance of the Local Plan and has recently received outline planning consent without any requirement to contribute towards the east facing slips onto the A299. However, in the event that the planning consent elapses, or a new planning application is made, it will be appropriate to retain the proposed highway infrastructure requirements in this policy.</p> <p><u>PRoW</u></p> <p>Public Footpath CW20 runs in part within the site. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Points 3(i) and 4(a)(i)-(iv) which relate to the conservation and enhancement of the PRoW network and the requirements of an access and transport strategy.</p> <p>In respect of point 5, the County Council would suggest that there be a stated requirement for the phasing and delivery of the PRoW network.</p>
<p>Policy W6 – Bodkin Farm</p>	<p><u>Highways and Transportation</u></p> <p>No reference has been made in this policy to the delivery of the east facing slips onto the A299. As with site W4, early delivery of the slips is expected to accommodate traffic growth from development in Whitstable. It will be appropriate to restrict the amount of occupations on this site until the new junction with the A299 has opened.</p> <p><u>Development Investment</u></p> <p>Paragraph 5(a) states that the secondary school site should be transferred on commencement of the development. It is currently anticipated that this school site will come forward mid to late in the local plan period. Whilst the County Council wishes to maintain flexibility of delivery, in order to be able to react to alternative grant funding sources, it should be recognised, in the drafting of this paragraph that delivery is unlikely to be early in the plan period. It is noted that the Draft Infrastructure Delivery Plan 2024 records potential delivery being late in the plan period.</p> <p><i>In respect of point 2(a)</i> Whilst the County Council will encourage community use of school infrastructure through its agreement with the academy sponsor, it should be noted that any community use of sports facilities will be out of school hours and through a community use agreement.</p> <p><u>PRoW</u></p> <p>Public Footpaths CH8 and CW68 run along the site's southern boundary and creation of links to Public Footpaths CH12 and CH13 should be reviewed. The County Council would</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council also supports points 4(a)(i)-(iii) which relate to the requirements of an access and transport strategy.</p> <p>In respect of point 5, the County Council would request that there be a stated requirement for the phasing and delivery of the PRoW network.</p>
4. Herne Bay	
<p>Policy HB1 - Herne Bay Town Centre</p>	<p><u>Highways and Transportation</u></p> <p>Regeneration of the town centre is supported and the County Council look forward to the opportunity of working with the LPA to accommodate improved connectivity for pedestrians and cyclists, use of public transport and improving traffic flow.</p>
<p>Policy HB4 - Land to the west of Thornden Wood Road</p>	<p><u>Highways and Transportation</u></p> <p>In order to ensure that the site does not provide a vehicular link between the A2990 Thanet Way and Thornden Wood Road, the policy should make clear that the two primary accesses serve each of the secondary school and residential development in isolation respectively.</p> <p><u>Development Investment</u></p> <p>Paragraph 1(a)(i) states a school site size of <u>circa. 8.03ha</u>. It is requested that the wording is amended to <u>a minimum of 8.03ha useable space</u>. The proposed area for the secondary school incorporates a brook and steep embankment on either side, rendering a considerable section of land unusable for both buildings and playing surfaces. There is also a public right of way (PRoW) traversing the proposed school site at the midpoint, running east to west. The County Council requires an undivided site. The land is also of irregular shape, leaving part unusable.</p> <p>In respect of paragraph 2.(a), it should be noted that any community use of sports facilities will be out of school hours and through a community use agreement.</p> <p><u>PRoW</u></p> <p>Public Footpath CH12 runs within the site. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Points 4(a)(i)-(iv) regarding the requirements of an access and transport strategy, though it should be noted that in identifying need to divert part of Public Footpath CH12 outside of the secondary school site, this should be required within consideration phasing and delivery of the PRoW network.</p>
<p>Policy HB10 - Eddington Business Park</p>	<p><u>PRoW</u></p> <p>Public Footpath CH21 runs within the site. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p>
5. Rural Areas	

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
<p>Policy R1 - Rural service centres</p>	<p><u>Highways and Transportation</u></p> <p>The County Council may be supportive of development that helps to sustain the viability of rural settlements, and enhance their community facilities and services, provided they can be appropriately accessed by walking and cycling. The County Council does appreciate that the level of modal shift within the rural areas may be less than that can be achieved within the urban areas but practical measures should be explored where reasonable.</p> <p><u>PRoW</u></p> <p>The County Council is supportive of Points 2(c) and 2(d)(iii) which relate to the need for supporting accessibility and improvements to sustainable transport infrastructure, including the PRoW network.</p>
<p>Policy R2 - Great Pett Farmyard</p>	<p><u>PRoW</u></p> <p>At present, no PRoW are identified within the site boundary; however, Public Footpath CB300 and promoted route 'Coast to Cathedral cycle ride - Dover to Canterbury' are in close proximity and should be recognised. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is support of Points 3(e) and 4(a)(i) which relate to the conservation and enhancement of the PRoW network and the requirements of the access and transport strategy.</p>
<p>Policy R5 – Bread and Cheese Field</p>	<p><u>Highways and Transportation</u></p> <p>It is noted that the previously requested requirement to provide contributions towards the Sturry Relief Road has now been included within the policy. Sites that have already consented that they will contribute towards this highway project are restricted on the number of occupations allowed prior to the completion of the new road, and it will be expected that this site and any others within Hersden, Broad Oak and Sturry are also similarly restricted and contribute towards this infrastructure. This will therefore also apply to sites R6, R9, R10, R14, R15 and R16.</p>
<p>Policy R6 – Land at Hersden</p>	<p><u>Highways and Transportation</u></p> <p>As with site R5, this policy should include a requirement to make contributions towards the Sturry Relief Road and be restricted until the highway scheme has been completed.</p>
<p>Policy R7 - The Hill, Littlebourne</p>	<p><u>Highways and Transportation</u></p> <p>Section 5 should require the link road to be provided at the earliest opportunity in order to limit the amount of traffic that uses Bekesbourne Lane junction with the A257 High Street.</p> <p><u>PRoW</u></p> <p>There appear to be no PRoW within the site, which is inconsistent with Section 4(iv) stating “<i>Improvements to the PRoW network crossing and around the site as required.</i>”. This should be reviewed and corrected as required.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
Policy R8 – Land north of Court Hill	<p><u>Highways and Transportation</u></p> <p>No reference has been made within this policy for the site to provide safe and convenient pedestrian and cycle connectivity. This should be included.</p>
Policy R9 - Land north of Popes Lane	<p><u>Highways and Transportation</u></p> <p>The County Council is satisfied with the amendments made to this policy in order to include contributions towards the Sturry Relief Road and to restrict occupation on the site prior to the opening of it. These requirements will be requested for all site policies in Sturry, Broad Oak and Hersden, as stated above.</p> <p><u>PRoW</u></p> <p>Public Footpaths CB58 and CB59 run within the site or along its eastern boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council also supports points 4(a)(i)-(iii) which relate to the requirements of an access and transport strategy.</p> <p>In respect of point 5, the County Council would request that there be a stated requirement for the phasing and delivery of the PRoW network.</p>
Policy R10 - Land at The Paddocks, Shalloak Road	<p><u>Highways and Transportation</u></p> <p>Whilst the requirement to provide contributions towards the Sturry Relief Road are included within this policy, in keeping with the other sites in Sturry and Hersden, delivery and phasing should be specified to restrict occupation on the site prior to the opening of the relief road.</p> <p><u>PRoW</u></p> <p>Public Footpath CB52 runs within the site or along its northern boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Points 4(b-c) which relate to the requirements of an access and transport strategy.</p>
Policy R11 - Local service centres	<p><u>PRoW</u></p> <p>Point 2(c), relating to the support for improvements to sustainable transport infrastructure, including the PRoW network is welcomed.</p>
Policy R14 - Land at Goose Farm, Shalloak Road	<p><u>Highways and Transportation</u></p> <p>This policy should include a requirement to make contributions towards the Sturry Relief Road and be restricted until the highway scheme has been completed.</p> <p><u>PRoW</u></p> <p>Public Footpaths CB46 and CB48 run within the site or along its boundaries. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>The County Council recommends that the policy should specify that an access and transport strategy for the site should provide walking and cycling connections, particularly for the proposed residential units.</p>
<p>Policy R15 - Land at Shalloak Road</p>	<p><u>Highways and Transportation</u></p> <p>This policy should include a requirement to make contributions towards the Sturry Relief Road and be restricted until the highway scheme has been completed.</p> <p><u>PRoW</u></p> <p>Public Footpath CB48 runs within the site or along its southern boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the PRoW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council recommends that the policy should specify that an access and transport strategy for the site should provide walking and cycling connections, particularly to Public Footpath CB48.</p>
<p>Policy R16 – Land fronting Mayton Lane</p>	<p><u>Highways and Transportation</u></p> <p>This policy should include a requirement to make contributions towards the Sturry Relief Road and be restricted until the highway scheme has been completed.</p>
<p>Policy R17 - Broad Oak Reservoir and Country Park</p>	<p><u>Highways and Transportation</u></p> <p>Section 4 (f) will need the Transport Assessment to consider the construction phase of the development as this is likely to have a major impact on the highway network.</p> <p><u>PRoW</u></p> <p>Various Public Footpaths, Public Bridleways and a Restricted Byway are located within the site or along its boundaries. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the ProW network arising from this proposal throughout the Local Plan process and moving forwards.</p> <p>The County Council is supportive of Points 3(i) and 4(a-b) which relate to the conservation and enhancement of the ProW network and the requirements of the access and transport strategy.</p> <p>In respect of point 5, the County Council would request that there be a stated requirement for the phasing and delivery of the ProW network.</p>
<p>Policy R18 – Land at Church Farm</p>	<p><u>PRoW</u></p> <p>Public Footpath CB99 runs within the site or along its western boundary. The County Council would therefore welcome engagement to ensure proper consideration of the impact on the ProW network arising from this proposal throughout the Local Plan process and moving forwards.</p>
<p>Policy R19 – Countryside</p>	<p><u>PRoW</u></p> <p>The County Council is supportive of point 5 which relates to the need to protect the network of valued open spaces, green infrastructure and sports and recreation opportunities.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
6. District Wide Strategic policies	
Rural Housing	<p><u>Heritage Conservation</u></p> <p><i>Paragraph 6.11</i></p> <p>It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage, the County Council and Kent Downs Area of Outstanding Natural Beauty (AONB) (now known as Kent Downs National Landscape) have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed on whether they are consistent with existing character. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that Canterbury City Council considers adopting the guidance as SPD, as part of the Local Plan process.</p>
Policy DS4 – Rural Housing	<p><u>Heritage Conservation</u></p> <p>The County Council is supportive of point 3(a) of the policy that encourages re-use of heritage assets. The County Council also support clauses 4(c) and 5€ which permits siting of new build among groups of farm buildings. It should be noted though that this could equally apply to non-housing development should the historic character of the farmstead permit it.</p>
Policy DS6 - Sustainable design	<p><u>Highways and Transportation</u></p> <p>Included within this policy is the requirement promote healthy lifestyles by making walking and cycling safe and accessible. This reflects the County Council’s transport objectives to place less reliance on car journeys and is supported. Similarly, it seeks the appropriate design of developments to accommodate parking and electric vehicle charging, which is also supported.</p> <p><u>Heritage Conservation</u></p> <p>The County Council welcomes clause 8 (c) (iv) that requires developers of projects over 300 homes to include a strategy for culture and heritage in their project designs. This can help to ensure not only that Canterbury’s heritage is treated appropriately during the process, but also that the opportunities it provides can be seized. It is important that these strategies include all aspects of heritage, including historic buildings, landscapes and archaeological remains, that they explain how the heritage will be conserved and enhanced during the development process, and that they show how the proposed development has responded to the potential of the heritage to better integrate the new development into the existing landscape and townscape. The community engagement identified in point 8 (c)(i) should, where appropriate, also include heritage aspects in the form of community archaeology. S106 agreements should be used to ensure that the new community, and the existing community affected by the development, have the opportunity to develop activities designed to help them enjoy and value their heritage. The County Council is developing advice for the inclusion of heritage aspects into S106 agreements and would be happy to discuss this further with the City Council.</p>
Policy DS7 - Infrastructure delivery	<p><u>Highways and Transportation</u></p> <p>The County Council will work with the LPA in order to agree the appropriate mechanisms to secure and deliver the infrastructure required to mitigate development. The timing and phasing of infrastructure or mitigation will require consideration, and where not fixed in specific policies, this will need to be derived from an appropriate assessment.</p> <p><u>Development Investment</u></p> <p>The County Council considers that it is currently not clear from paragraphs 5 and 6 what the City Council proposes to be funded under CIL and s106. It is suggested that reference should be made to the Draft Infrastructure Delivery Plan 2024, which sets out clearly how infrastructure will be funded.</p> <p>In respect of paragraph 9, the County Council welcomes the addition of a review mechanism where a development has an accepted viability statement and cannot demonstrate policy compliance.</p> <p>Paragraph 8 states that viability appraisals will be independently reviewed and published by the local planning authority. Where viability impacts county council service provision, the County Council wishes to be involved in the viability review, with full access to an unredacted copy of the viability statement and where necessary will instruct its own viability review.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p><u>PRoW</u></p> <p>The County Council recommends that paragraph 6.18 is enhanced to <i>“The timing of infrastructure delivery is an important consideration, and a delivery programme should be developed and agreed, in consultation with infrastructure providers, to ensure that infrastructure is delivered at the right time to support growth <u>and to embed culture change</u>”</i>;</p> <p>The County Council recommends point 7 is enhanced to <i>“... All types of infrastructure connections to existing footpaths and cycleways <u>and the PROW network</u> should be delivered prior to occupation.”</i></p>
<p>Policy DS8 - Business and employment areas</p>	<p><u>PRoW</u></p> <p>The County Council recommends Point 7 is enhanced to <i>“Proposals for new business or employment premises must deliver fibre to the premises (FTTP) infrastructure and any necessary on site <u>and off site</u> sustainable transport infrastructure prior to first occupation”</i>.</p>
<p>Policy DS7 – Infrastructure Delivery</p>	<p><u>Development Investment</u></p> <p>The County Council recommends that the section on <i>“Education and associated development”</i> – should be titled <u>Further/Higher Education and Associated Development</u> to avoid confusion with Early Years, Primary, Secondary and SEND Education.</p>
<p>Policy DS13 - Movement hierarchy</p>	<p><u>Highways and Transportation</u></p> <p>The County Council has no adverse comments to make in respect to this policy wording.</p> <p><u>PRoW</u></p> <p>The County Council supports the prioritisation of walking, cycling, and public transport.</p>
<p>DS14 – Active and Sustainable travel</p>	<p><u>Highways and Transportation</u></p> <p>The County Council support the objectives of this policy, as per the previous consultation.</p> <p><u>Development Investment</u></p> <p>The County Council would welcome the provision of policy requirements for school provision to be located within 400m of a bus stop, as well as new housing.</p> <p><u>PRoW</u></p> <p>The County Council is encouraged to note many references to ProW and the recognition of the value of the PRoW network to meet the Plan’s ambitions. There are, however, amendments suggested by the County Council.</p> <p>Of particular need is for the inclusion of a separate and additional Policy focused on ProW; Policy DS14A is proposed below. The County Council considers it essential that PRoW should be understood as a separate topic (albeit over-arching many of the Plan’s ambitions and policies) given the different and specific processes and considerations within statutes and practice for creating, diverting, and managing ProW. Having a specific PRoW policy would not be exceptional given, for example, Policy DS15 is specific to Highways and Parking. In so doing, it would provide a consistent framework of guidance for all, but particularly developers and public users, to consider development proposals and their effects on off-road access. Having a clear, holistic understanding and ensuring, for example, neighbouring developments complement rather than contradict each other, will ensure the Plan’s ambitions are met efficiently and future users’ amenity and experience is properly considered. The County Council suggests it would be a simple amendment to reference the Policy</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>within each relevant other Policy, and possibly the Policy could be inserted after Policy DS14 – Active and sustainable travel.</p> <p>In introducing a separate ProW policy, the County Council recommends the inclusion of the following statements:</p> <ol style="list-style-type: none"> 1. <u>PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic, each of which are recorded on a relevant Definitive Map (the Glossary will need similar amendment – see Point WW below);</u> 2. <u>PRoW are public maintainable highways, so due similar consideration as public roads, meaning the disturbance of their surfaces, the introduction of any new structure on over under or immediately adjacent to a PROW, or an action that endangers or inconveniences path users, may be a criminal offence;</u> 3. <u>PRoW are a material consideration in the determination of any planning application. Applicants are, therefore, encouraged at an early stage to investigate the existence of PRoW in developing their site plans – PRoW can be identified using the County Council’s online mapping: https://webapps.kent.gov.uk/countrysideaccesscams/standardmap.aspx</u> 4. <u>The present District PRoW network needs to be enhanced and extended to support the Plan’s active travel ambitions. The existing PRoW network is disjointed, whether severed by roads or having no continuity of public rights; and is predominantly comprised of Public Footpaths, where lawful public use is limited to pedestrian and mobility vehicle access. The County Council expects future development to assist in resolving these issues around the county, such as by up-grading the status of footpaths to bridleways, thereby extending lawful use by cyclists. Also by creation of new short lengths of PRoW so as to create direct and safer crossings of roads. Both these solutions can be achieved at comparatively small cost to road network enhancements;</u> 5. <u>Recognition of the ROWIP, a statutory document for PRoW management, and Kent County Council’s ‘Framing Kent’s Future’ strategy for 2022-2026.</u> <ol style="list-style-type: none"> (f) <u>a clear statement that timely delivery of changes to ProW, and usually ahead of occupation of development, shall be necessary to avoid unnecessary disruption and/ or failure to embed new or changed behaviours; prior of works by the County Council is necessary to avoid being a criminal offence;</u> (g) <u>where diversion of an existing ProW is considered necessary as part of a development proposal, the appropriate legal process must be progressed with ourselves to ensure a timely and legal development. Developers are encouraged to engage with the County Council at their Masterplanning stage to ensure any potential issue is efficiently considered and programmed.</u> <p>The County Council supports use of mechanisms including Section 106 agreements and the Community Infrastructure Levy to secure the delivery of reasonable and necessary infrastructure in the surrounding area. In addition, in recognising any new assets are to be managed as part of the future PRoW network with the consequent on-going maintenance liability, a contribution for that on-going maintenance will be required in addition to the initial infrastructure provision.</p> <p>Any site in proximity to a rail crossing that connects to the PRoW network would be required to consult with and work in partnership with both Network Rail and the County Council to ensure public safety as well as PRoW connectivity is ensured and improved.</p> <p>As to a specific Policy, the following is suggested:</p> <p><u>DS14A — Public Rights of Way (ProW)</u></p> <p><u>Planning permission will be granted for development which meets the following criteria:</u></p> <ol style="list-style-type: none"> 1. <u>An access and transportation strategy should be prepared for the site regardless of its size and should:</u> <ol style="list-style-type: none"> (b) <u>Identify all existing ProW within the site;</u> (c) <u>Identify the existing ProW network outside of the site boundary that reasonably could be used by future site occupants to access services, neighbouring communities, and the countryside as applicable in addition to use for personal wellbeing and exercise;</u> (d) <u>Improvements both within and outside of the site should be proposed so as to enhance and ensure PROW users’ safety, convenience and enjoyment, and to minimize the need for use of private cars in response to climate change. Where connections to neighbouring developments are identified, applicants are expected to co-ordinate provision, preferably by formal means, with each other to ensure PROW users’ safety, convenience and enjoyment are maximised, and to ensure seamless provision of facility and standards;</u> (e) <u>State how improvements identified in (c) above are expected to be funded;</u> (f) <u>State a timetable for delivery of improvements identified in (c) above.</u> <p>The proposed policy DS14 makes reference to access by those with disabilities. The County Council wishes to highlight that disabilities affecting access are broader than just mobility</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>impairment, such as with sight impairments. The County Council would suggest that the draft Local Plan acknowledges this and considers how development can ensure those with any disability are provided for so as to conveniently enjoy access within the District.</p> <p>Similarly, the draft Local Plan does not acknowledge that access needs can differ also. To ensure non-vehicle access is an attractive and chosen option by the majority, access for all ages must be considered in proposing designs of future off-road access.</p> <p>In respect of point 1 of the policy, the County Council recommends this is enhanced to <i>“Proposals for development must demonstrate how they will <u>enhance and</u> maximise high quality walking and cycling connectivity ‘...’ and ‘... rerouted and upgraded to avoid development, providing a publicly accessible, high quality route, subject to statutory processes”</i></p>
<p>Policy DS15 – Highways and Parking</p>	<p><u>Highways and Transportation</u></p> <p>The policy is considered acceptable in its current wording.</p> <p><u>PRoW</u></p> <p>In respect of point 5, this highlights the advantages of neighbouring sites working collaboratively, which is positive. The County Council will expect neighbouring site developers to similarly work together to optimise changes and enhancements to PRoW and other walking and cycling access schemes for future users' convenience and enjoyment.</p>
<p>Policy DS17 – Habitats of international importance</p>	<p><u>Biodiversity</u></p> <p>The County Council notes that this policy states that Appropriate Assessment will be required. The County Council notes that it is the Local Planning Authority's responsibility to provide the Appropriate Assessment, however, it is the responsibility of applicants to provide the information for the assessment to take place. It is recommended that roles are clarified within this policy.</p>
<p>Policy DS18 – Habitats and landscapes of national importance</p>	<p><u>Biodiversity</u></p> <p>The County Council recommends that point 4 and 5 of this policy are combined for clarity.</p>
<p>Policy DS20 - Flood risk and sustainable drainage</p>	<p><u>Sustainable Urban Drainage Systems (SuDS)</u></p> <p>The County Council, as Lead Local Flood Authority is pleased to see commentary raised in previous consultations have been incorporated into this document.</p> <p>Point 4 contains a requirement for new developments to adhere to the drainage hierarchy as per the PPG (in full). The County Council would advise for including rainwater harvesting/ reuse as a recommendation at the end of point 4.</p> <p>The inclusion of rainwater harvesting is particularly relevant to commercial or industrial settings that have both large impermeable surfaces and greater opportunity (associated costs and space) to include such measures as opposed to residential dwellings.</p> <p>The County Council requests that the statements within point 3 regarding when the sequential test is not required is checked to ensure it is in line with current guidance.</p>
<p>Policy DS21 – Supporting biodiversity recovery</p>	<p><u>Biodiversity</u></p> <p>The County Council is supportive of the proposal for 20% biodiversity net gain, however, would recommend that clear and sufficient information and justification is provided. The County Council highlights this report for the City Council information.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
<p>Landscape Character</p>	<p><u>Heritage Conservation</u></p> <p><i>Paragraph 6.69</i></p> <p>It is important that landscape considerations include an assessment of the historic aspect of the landscape in its designation decision-making. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character that is firmly rooted in the past. The Kent Historic Landscape Characterisation Survey (HLC) (2001) is an important resource for understanding the landscape of Kent and its development through time. The County Council acknowledges, that the HLC is a strategic, not local, assessment. It does however allow us to look at the landscape of Kent and draw conclusions about the development of the landscape in different parts of the county and the county as a whole. It is not detailed enough to use at a large scale. What is needed is a more detailed assessment of the landscape of Canterbury as has already been carried out for Tunbridge Wells Borough and the Hoo Peninsula, for example. The County Council would be happy to discuss this further with the City Council.</p>
<p>Historic environment and archaeology</p>	<p><u>Heritage Conservation</u></p> <p><i>Paragraph 6.83</i></p> <p>Given the enormous importance of Canterbury's heritage to its residents, visitors, the nation and the world (as reflected in its World Heritage Site status), the current text significantly underplays this importance as well as the potential of the district's heritage to play a formative role in life and wellbeing of its residents. The clear omission which needs to be corrected is the district's heritage review so that the age and range of heritage assets can be appreciated by the reader with their potential to contribute to life in the district understood.</p> <p>Paragraph 6.84, moreover, simply notes the existence of a national framework for heritage provided by national policies and implies these, together with policy DS26, are enough to manage Canterbury's heritage and fulfil its potential. The County Council does not consider these to be sufficient. The County Council would expect to see Canterbury's heritage reviewed, and policies presented for archaeology, Conservation Areas, Listed Buildings and Locally Listed Heritage Assets, Historic Parks and Gardens. Although these aspects are discussed in the Heritage Strategy, the Strategy does not include policies for the management of the historic environment and a stronger policy commitment than DS26 is required.</p> <p>It should be noted that within Canterbury city itself, the management of the archaeological resource is based on the Canterbury Urban Archaeological Database (UAD). The City Council developed the UAD in partnership with the Canterbury Archaeological Trust, but it has not been updated since 2007. Although it remains a very important tool for development control it is therefore now out of date and a programme of updating is required. The County Council would be willing to engage further on this matter.</p>
<p>Policy DS26 - Historic environment and archaeology</p>	<p><u>Heritage Conservation</u></p> <p>Policy DS26 is a single catch-all policy for the historic environment. Although it includes all the main aspects of the historic environment, including them all in one policy prevents any meaningful presentation of context, or exploration of how heritage issues will be used in a positive way to enhance life in the district. It would be preferable if this policy could be broken down into its key components, being:</p> <ul style="list-style-type: none"> - Archaeology, including World Heritage Site issues - Built heritage, including non-listed buildings, Listed Buildings and Conservation Areas - Historic landscapes, including historic parks and open spaces - Local Heritage Assets. Canterbury does have a large number of locally listed buildings but the Local Plan does not at present explain what this status means or what weight will be given to Locally Listed status. <p>If a single policy is to be retained, then it must include a clause that commits the City Council to delivering the goals and actions presented in the Heritage Strategy.</p>
<p>7. Development Management Policies</p>	
<p>Policy DM5 - Parking design</p>	<p><u>Highways and Transportation</u></p> <p>The policy and the associated parking standards shown in Appendix 3 are in alignment with the Highways authority, and can therefore be supported.</p> <p><u>PRoW</u> Point (a) is recommended to extend to ensure parking does not obstruct PRoW or other walking and cycling provision.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
<p>Flood risk</p>	<p><u>Heritage Conservation</u></p> <p>SuDS may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area’s drainage can change the moisture level in the local environment. Archaeological remains in particular are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings by flood damage to their foundations.</p> <p>When SuDS are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. The County Council has recently produced guidance for SUDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets. This is available on request.</p>
<p>Policy DM15 - Sustainable drainage</p>	<p><u>Heritage Conservation</u></p> <p>The County Council would recommend the following amendment:</p> <p><i>“Any proposals for development in this area must appropriately consider possible coastal change, flood risk, <u>impact on heritage assets</u>, future wetland habitat enhancements and public safety”</i></p>
<p>8. Carried Forward 2017 Local Plan Policies</p>	
<p>Policy CF3 - Pedestrian and cycle routes</p>	<p><u>PRoW</u></p> <p>The County Council supports the continued inclusion of this policy as part of the Development Plan.</p>
<p>Appendix 1: Glossary</p>	
	<p><u>Development Investment</u></p> <p>The County Council recommends that the Educational facilities, and the infrastructure definition for education, should be expanded to include early years nursery and special educational needs and disabilities (SEND).</p> <p><u>PRoW</u></p> <p>The County Council recommends the following additions to the glossary:</p> <p><u>Active Travel: the definition used by the County Council for its Active Travel Strategy is encouraged for consistency across the County - https://www.kent.gov.uk/about-the-council/strategies-and-policies/transport-and-highways-policies/active-travel-strategy;</u></p> <p><u>Green Infrastructure (GI): the County Council considers PROW a vital component of GREEN INFRASTRUCTURE and recommends the definition specifically references PROW in order there is clarity for all;</u></p> <p><u>Public Rights of Way (PROW): the County Council recommends this is defined as 'PROW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways</u></p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p><u>Open to All Traffic. Depending on a path's status, access is permitted on foot, bicycle, horse, horse with drawn carriage, and by motor vehicle. Each are public highways, similar to public roads, and are for public use at any and all times unless formally closed by Kent County Council.'</u></p>
<p><u>Draft Canterbury District Transport Strategy</u></p>	
<p><u>Highways and Transportation</u></p>	
<p>Overview;</p> <p><i>Transport Strategy Approach 2025 to 2045</i> – As now promoted by current national and local policies and strategies, the proposed approach to transport planning for considering development is using the “monitor and manage”, which can also be referred to as “decide and provide” and “vision and validate”, The County Council agrees that this is an appropriate methodology. However, it must be ensured that the targets set for the mode share of how journeys will be made are realistic and achievable.</p> <p>The County Council would ask that a robust methodology and clear evidence to set these targets should be provided, and further details of what additional mitigation or measures would be required should the subsequent monitoring indicate that the targets were not being achieved. This does require contingency up front within the planning obligations and funding sources to be able to react to the monitoring. The County Council would like to work with the District to understand how this is managed and detailed within the strategy.</p> <p>Ultimately, the County Council will want to be satisfied that the highway network can operate without experiencing unacceptable levels of congestion, and that sufficient resources and measures can be called upon to protect the operation of the highway network.</p> <p><i>Hierarchy of Transportation modes</i> – The hierarchy aligns with the County Council’s policy to encourage active travel and sustainable transport for journey choices.</p> <p>Bus;</p> <p>Please refer to the comments provided in respect of the draft Canterbury District Bus Strategy.</p> <p>As noted, this is an ambitious approach that sets out to provide good access to high frequency bus services running throughout the district. The County Council supports the vision of improved public transport, and it is considered that increasing the range of services and frequency together with shorter journey times on these routes, can achieve mode shift away from the private car.</p> <p>Reallocation of road space and the signalisation of junctions to give priority to buses will reduce the capacity of the local highway network for all other vehicles in those locations, and the County Council will be concerned where this may lead to unacceptable levels of congestion. Traffic modelling has yet to be completed in order to demonstrate what the impact of the changes are likely to be, and strong evidence will be required to support the levels of mode share being promoted by the strategy.</p> <p>Active travel (walking and cycling);</p> <p>The strategy is generally supported and is considered appropriate to improve walking and cycling connectivity within the district. As with bus infrastructure, the impact from junction alterations or reallocation of road space to accommodate the walking and cycling improvements proposed will need to be considered within the traffic modelling.</p> <p>Rail Improvements;</p> <p>Measures to improve access to railway stations and providing additional facilities to encourage walking and cycling to these is supported. The County Council is also in support of lengthening the platforms at Sturry and Canterbury West to accommodate the full length of the trains that stop at these stations.</p> <p>Park & Ride;</p> <p>As commented already, the expansion of the Park and Ride offer is supported and will need to be promoted as an attractive alternative to accessing Canterbury by private car and using the city centre car parks. This will need to be complimented by low pricing and removal of city centre parking.</p> <p>Incremental approach to implementation;</p> <p>It is agreed that an incremental approach is necessary in order to follow the “monitor and manage” methodology for the implementation of the interventions proposed, based on the success of the strategy. It will need</p>	

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>to be demonstrated that achievable mitigation or measures can be delivered to address targets not being met.</p> <p>Short term 2025 to 2030;</p> <p><i>Parking Strategy measures</i> – Low parking charges for the Park & Ride are essential to capture vehicles that would otherwise continue into the city centre to use the car parks there and be closer to their final destinations. This does need to be complimented by the removal of most of the city centre car parking, except for an appropriate level of disabled spaces, and replaced with Park and Ride capacity.</p> <p>The strategy advocates removal of 10% of the city centre public car parking, but this may not decrease traffic levels being drawn to them enough to release sufficient highway capacity on the ring road and approaches to accommodate local plan growth.</p> <p>It is considered that city centre public car parking will still generate traffic movements through the most congested parts of the network, and a 10% reduction in parking capacity may not actually reduce the attraction of driving to the city centre. This is particularly relevant as the car parks are still likely to have excess capacity during the AM, and to a lesser degree, PM peak hours when the operation of the highway is most stressed. The County Council is concerned that the reduction proposed will not be sufficient to deter enough traffic from accessing the city centre. It is appreciated that disposal of car parks will form part of the medium-term strategy, but the earlier implementation of more comprehensive reduction will also indicate the success of such measures to evidence moving forward.</p> <p><i>Bus strategy measures</i> – The measures within the short term are supported, but the wording may need to be amended so as not to restrict those bus priority schemes that remove road space in the wider sense, such as on-street parking, rather than those that remove traffic lanes from dual carriageway sections. The wording should not be such that it would exclude the Wincheap gyratory scheme from being delivered in the short term.</p> <p>Medium term 2030 to 2035;</p> <p>The County Council cannot as yet confirm whether these proposed schemes are likely to be acceptable as the traffic modelling has not been completed and the mode share evidenced. The impact of these needs to be fully assessed and this may inform whether other interventions are required.</p> <p>Long term 2035 to 2040;</p> <p>The County Council is generally supportive of the long term measures proposed. However, consideration of reallocating road space will need to demonstrate through traffic modelling that the impact can be accommodated on the highway network.</p> <p>Whitstable and Herne Bay;</p> <p>Although it is appreciated that they are contained with the draft Canterbury District Local Plan, and in the Highway infrastructure schemes chapter, no mention has been made within this chapter of the proposed east facing slips. It would be appropriate to acknowledge the highway infrastructure proposed.</p> <p>Highway infrastructure schemes;</p> <p>The infrastructure associated with the A2 slips and Merton Park is still under consideration, and it has not been determined whether the committed “Fourth slip” at Wincheap should be replaced with an alternative one directly accessing the development. The description of the key infrastructure will need to be amended.</p> <p>Measuring Success;</p> <p>Further evidence is required in order to justify the mode share forecasts that are expressed in this chapter, and the traffic modelling has yet to be completed to demonstrate whether traffic volumes and congestion are predicted to reduce on the district’s roads. The County Council will be able to comment further on this once the supporting traffic modelling is completed.</p> <p><u>PRoW</u></p> <p>As with all consultations reviewed, the County Council is keen to ensure its interests are represented with respect to its statutory duty to protect and improve Public Rights of Way (PRoW) in the county.</p> <p>This Strategy is welcomed in principle by the County Council. Its aims include ensuring access to sustainable transport and convenient Active Travel opportunities, which are a key ambition for the Council. However, County Council seeks clarification on a number of points and recommends changes as follows.</p> <p><i>Policy context</i></p>

Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)

Policy/Paragraph	Commentary
	<p>References to the NPPF and Kent County Council's 'Framing Kent's Future' strategy for 2022-2026 are welcomed as being appropriate frameworks within which to promote a strategy. The County Council recommends that the Strategy is flexible to be able to adapt moving forward.</p>
	<p>Paragraph 3.2, the County Council recommends the following amendment: <i>"The NPPF policies on promoting sustainable transport state that planning policies <u>and decisions</u> should support the provision of facilities and amenities that reduce the need to travel <u>unsustainably</u>: ..."</i>;</p>
	<p>The County Council welcomes acknowledgement of the County Council Local Transport Strategy and the KCWIP. The County Council expects to be involved in the on-going development of both as well as delivery of infrastructure around the district Pro network.</p>
	<p><u>Overview</u></p>
	<p>Paragraph 4.3, the County Council welcomes the 'Hierarchy of Transportation modes' as a guiding principle in the Draft Local Plan and this Strategy.</p>
	<p><u>Active travel (walking and cycling)</u></p>
	<p>The concept of 'Active Travel' is acknowledged and referred to in general terms but not clearly defined. The County Council recommends the <u>definition</u> used by the Council for its Active Travel Strategy for consistency across the county.</p>
	<p>Paragraphs 6.4 and 6.7 – these paragraphs state developers will provide walking and cycling links to and through new developments that are more convenient than driving. The County Council considers it would, ordinarily, be preferable for developers themselves to deliver infrastructure to standards agreed with both the local highway and planning authorities; but accepts there will be occasions when it is appropriate to only accept provision in terms of allowance on otherwise undeveloped land and/ or a financial contribution to the final costs of provision. The City Council is requested to confirm.</p>
	<p>Paragraphs 6.4 and 6.7 - it is welcomed that both paragraphs state <i>"Where [walking/ cycling] links are not on the highway we will require an agreed maintenance regime or commuted sum to cover this"</i>. The County Council supports the principle that a developer should fund infrastructure it relies on to secure the grant of planning permission.</p>
	<p><u>Accessibility</u></p>
	<p>Paragraph 9.1, the County Council strongly supports recognition of the needs of disabled persons for their future safe and convenient access around the district. The County Council wishes to highlight that disabilities affecting access users are broader than just mobility impairment; for example, sight impairments. The City Council is encouraged to ensure that all future schemes are developed with the support of relevant organisations to ensure provision reaches the widest possible audiences.</p>
	<p>Paragraph 9.3, checking that walking and cycling routes do not disadvantage disabled users implies the existing routes will be modified where considered necessary; however, clarity is needed on who will make such decisions, who will deliver any agreed modifications, also who will fund such modifications.</p>
	<p>Paragraph 9.4, the County Council agrees it is essential to ensure footways, PRow routes, and other access routes are free of encroachments and obstructions for users' safety and convenience.</p>
	<p><u>Strategic development sites</u></p>
	<p>Paragraph 10.1, the County Council recommends that the first comma should be removed for this sentence to read as believed intended - <i>"Sites that are close to existing bus routes, or where bus routes can be adapted have been selected, and developers will be expected to provide suitable cycle links beyond the development boundary."</i></p>
	<p><u>Short term 2025 to 2030</u></p>
	<p>The <i>"construction of cycling and walking schemes"</i>, is welcomed. However, the County Council expects, for cycling improvements to also be funded and confirmation that LUF projects can and will include schemes utilising the PROW network.</p>
	<p><u>Medium term 2030 to 2035</u></p>
	<p>The County Council welcomes the various measures to improve walking and cycling routes and their connectivity with each other and to alternative modes.</p>
	<p><u>Long term 2035 to 2040</u></p>
	<p>The County Council welcomes delivery of walking and cycling schemes within the KCWIP.</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p><u>Whitstable and Herne Bay</u></p> <p>Paragraphs 15.1 and 15.6, the County Council supports delivery of the KCWIP and improvements to the Crab & Winkle Way cycle route.</p> <p>Paragraphs 15.5 for clarity, the County Council recommends this states Whitstable as the town in question.</p> <p>Paragraph 15.9 for clarity, the County Council recommends this states Herne Bay as the town in question.</p>
<u>Draft Canterbury District Bus Strategy</u>	
<u>Highways and Transportation</u>	
<i>Vision, aim and objectives;</i>	
<p>The vision, aim and objectives are supported by the County Council in order to encourage significant mode shift to public transport, so that reliance on the use of the private motor vehicle is reduced and pressure on the highway network to accommodate growth can be minimised. This will need to be supported by strong measures to make public transport a more attractive option over car, and be reliable and safe for users in the short and long term with the provision of services retained indefinitely. The viability of retaining services will need to be robustly demonstrated and the success of modal shift monitored. Further work is required to in order to further encourage modal shift and the County Council would like to continue to work with the City Council to ensure this takes place.</p>	
<i>Strategy Interventions</i>	
<p><i>Initiative K2</i> – This initiative proposes interactive screens in new developments. It is not clear whether these would only be located at the proposed transport hubs or within a neighbourhood centre. In any case, these should not be limited to new developments, and the strategy should aim to provide a network of these throughout the district.</p>	
<p><i>Initiative K8</i> – The national £2.00 bus single fare only has a limited period in which it is being funded. It is likely that this price cap will not be available in the future, so cannot be relied upon unless other funding sources are secured.</p>	
<p><i>Initiative J2/K1</i> – As above, fare subsidies will need to be funded. Developers already pump prime new services and the bus network has declined with many services being reduced or stopped as funding ends. The City Council must demonstrate how subsidies will be able to continue when the £2 cap nationally ends, given the increasing financial pressures Local Authorities are now finding themselves in. Unrealistic expectations should not be included.</p>	
<p><i>Initiative K7</i> – Other than CCTV, which is already in use, the strategy should identify what other interventions can be provided, as it is essential that viable and effective actions are taken to encourage the public to use buses.</p>	
<p><i>Initiative K11</i> – The funding source and body responsibly for the maintenance of the shelters and the additional infrastructure that may be provided to make the wait a more comfortable experience should be identified. As this could include items such as litter bins, seating and lighting that different organisations can be responsible for, the financial burden may affect a number of these.</p>	
<i>Infrastructure</i>	
<p><i>Reallocation of road space for buses/Junction improvements</i> – Any reallocation of road space away from private vehicles or bus priority measures will need to be robustly evidenced to demonstrate that the anticipated modal shift has already largely taken place and that other motor vehicles will not be severely impacted in terms of queue lengths and congestion.</p>	
<i>Operations</i>	
<p><i>Service Enhancements J6 & J7</i> – These needs to be explored in more detail the demand in rural areas is often insufficient to justify the current services, and will be harder to provide improved frequencies. Unless sustainable, increasing services to accommodate extremely low patronage will soon come under pressure. It should be recognised that the need to travel is diminishing with supermarkets offering home deliveries, internet purchases and food outlets now relying much more heavily on meal delivery partners.</p>	
<i>Targets and Monitoring</i>	
<p><i>Mode shift/Patronage targets</i> – Robust evidence will need to be provided to justify the ambitious targets used, so these can be considered as achievable. Many factors will influence the change in patterns and be specific to local circumstances, so like for like comparisons or other strong supporting information is required to underline this.</p>	

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>Key challenges and opportunities:</p> <p><i>Congestion</i> – The routes identified in paragraph 2.9 as congestion hot spots are likely to see higher levels of congestion with the removal of road space and introduction of bus priority measures without a significant shift in mode share or other measures/highway infrastructure to provide mitigation. The interventions suggested as opportunities to reduce congestion must be robustly evidenced to gain the support of the Highways Authority, as we would not support a strategy that is likely to cause more congestion and would affect both private vehicles and buses that would be caught in the same queues.</p> <p><i>Customer experience</i> – Tackling anti-social behaviour is a significant challenge and key to encouraging the take up of public transport. Viable measures should be put forward to deal with this, and the use of Community Support Officers and Wardens explored to regularly supervise those bus routes known for anti-social behaviour. Identifying those involved and being able to take action retrospectively should also be investigated, and even the presence of a uniform can often act as a deterrent.</p> <p>Chapter 3 – Bus services in Canterbury:</p> <p><i>Access to bus service</i> – Paragraph 3.4 notes that 64% of the population within Canterbury are within 400m of a high frequency bus corridor that provides greater than 4 buses per hour during the AM peak., though this drops significantly on a weekday evening and Sunday daytime. Given that the greatest impact on congestion and traffic would be expected during that peak hour, it will be vital to demonstrate why modal share would increase by as much as is being promoted during that period. To understand this, the reasons why those with the potential to use high frequency bus services for their journeys do not currently do so, and why they would realistically change their behaviour in future.</p> <p><i>Journey times and reliability</i> – Modal shift is expected with improvement to journey times using the bus, if making it more competitive with the private car, but this will only be possible provided the highway network isn't congested to the extent that it delays buses and prevents them from accessing the dedicated bus infrastructure. As the traffic modelling has yet to be completed, the impact on the road network cannot be understood at this time, so it is not known whether buses will be stuck in the same queues as the other traffic and be unable to access the bus lanes. In the case where cross city services or hopper buses are proposed that have routes on local roads without any bus lanes or priority, they will be even more prone to delays and this will affect their attractiveness over the private car.</p> <p><i>Bus Fares</i> – As already noted the £2 single journey bus fare cap was introduced. While this is a current incentive, the future availability of this scheme is not guaranteed. It is agreed that it does provide an early opportunity to encourage increased patronage, but subsidies for passengers will play a significant role in the success of the bus strategy. The potential future funding of these subsidies have been identified in the funding chapter (7) of the strategy, but the costs will need to be evidenced.</p> <p><i>Park and Ride</i> – The expansion of the Park and Ride offer is supported provided that it is promoted as an attractive alternative to accessing Canterbury by private car. It is noted that the document acknowledges the relatively low demand of the existing facilities in comparison to the city centre car parks, and that there are opportunities to expand capacity. The current usage suggests that demand is unlikely to increase unless motorists are no longer drawn into using the city centre's public car parks, which will need to be enabled through the removal of much of that parking and a competitive low pricing strategy for the Park and Ride.</p> <p>Chapter 6 – Short list interventions:</p> <p><i>Infrastructure</i> - The interventions have been discussed above. However, it should be reiterated that the delivery of infrastructure reallocating road space and signalling junctions for bus priority can only be supported where these would not have an unacceptable impact on congestion for the local highway network.</p> <p><i>Operations</i> – Interventions listed in section 6.6 to enhance bus services and expand the Park and Ride provision are welcomed, as they present the opportunity to enable more journeys to be taken by bus and reduce the number of vehicles entering the city centre. As has been commented on throughout, the effectiveness of these will be dependent on many factors that will influence travel behaviour. In the case of the bus service enhancements, the long term financial viability to support these indefinitely will need to be robust.</p> <p><i>Supporting interventions in Canterbury's 2025-2040 transport strategy (Short term)</i> – Increased parking charges in areas of the highest demand should only refer to the city centre and town centre car parks as there may be high demand in the Park & Ride sites, but low parking charges should be promoted in those facilities.</p> <p><i>Supporting interventions in Canterbury's 2025-2040 transport strategy (Medium term)</i> – Associated with the extension of residents parking zones, there should be incentives to encourage residents to use the bus. Consideration could be given to providing discounted bus travel to all residents who have a parking permit. It is likely that many visitors from further afield will anticipate high city centre parking charges if they are staying longer than a couple of hours. They will probably pass a Park & Ride site on their way into the city, whereas those residents who want to travel from one side of the city to the other are more likely to opt for the private car unless otherwise persuaded.</p> <p>Chapter 7 – Funding:</p> <p><i>Funding sources</i> – The potential funding contains a mix between indefinite sources such as local rates and levies, to what would effectively be one-off payments from developer contributions towards S106 /CIL. While some elements of the interventions such as highway infrastructure can be delivered in full within the expected budgets, the funding to maintain bus services and subsidies to the level proposed will have to be an ongoing commitment. As evident in the past, pump priming can support the initial running of new and enhanced services, but if they do not become commercially viable, there will be the risk that these services will</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>be reduced or withdrawn. How the continued funding required to support those services can be secured, must be demonstrated.</p> <p>Chapter 9 – Delivery plan:</p> <p><i>How Much</i> – It is appreciated that the costs associated to the interventions in tables 9.1 to 9.3 are broad cost ranges. It is not clear how these broad costs have been derived for each intervention, and whether ongoing funding of services is built into the financial model or this is assumed to be pump priming only.</p> <p>Chapter 10 – Monitoring and evaluation:</p> <p><i>Potential impact</i> – Paragraph 10.4 refers to research of other UK cities with similar attributes to Canterbury, and suggests that evidence would indicate the interventions may reduce bus journey times by 20-23% while impacts to private journey times are likely to be only marginally impacted. This may be misleading as the traffic modelling has not been completed yet to show what impacts the reduction in road space will have on the queue lengths for the private cars. The County Council as the Highways Authority does not agree that it will be only marginally affected at this time.</p> <p><i>Targets</i> – Further supporting evidence is required in order to justify the mode share targets shown in tables 10.1 and 10.2, so these can be considered realistic and achievable. The science behind how they have been derived should be set out, and with details of whether such changes have been experienced elsewhere, including what the key drivers were to persuade people out of their cars.</p> <p><i>Monitoring</i> – The continual monitoring of the success of the strategy is to be measured using fleet-sensitive cameras, which does not appear to feature in the infrastructure list. It is therefore not clear whether it has been included in the funding assumptions, or who will be responsible for the maintaining it. Clarity is sought on this matter.</p>
<p><u>Draft Canterbury District Open Spaces Strategy (2024)</u></p>	
	<p><u>PRoW</u></p> <p>This Strategy defines Public Open Space (POS) as per the Town and Country Planning Act 1990 definition, being “any land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground” (p4).</p> <p>The County Council considers the PRoW network is included by this definition given many people use individual PRoW for their recreation, health, and wellbeing. The Strategy, however, has not acknowledged the PRoW network for either its current use and the benefits to users or the future enhancement of the lives of the district's residents and visitors. Furthermore, the limited uses of 'path' and 'route' within the document do not encourage recognition of the PRoW network or assess the role it could play in satisfying the NPPF. The 'Summary of context' (p9) states the advantage of POS for people's physical activity and for climate change resilience, and concludes that good access is important - the County Council agrees with this statement and, consequently, would expect the PRoW network to be recognised in the Strategy, including assessing the contribution it can make to the Strategy's ambitions.</p> <p>The County Council questions when preparing this Strategy whether PRoW is being considered solely in terms of being a public highway and being a means of access / communication / transport, and thereby to recognise it solely within the Local Plan and the Transport Strategy. It could, therefore, be appropriate to acknowledge the network within this Strategy but for management and/ or enhancement of the network to be considered within the future Local Plan and Transport Strategy. Creation of new PRoW, uplifting the status of existing PRoW, and improving the quality of existing PRoW such as with new surfaces, increased width, and enhanced signage, could all deliver to this Strategy's ambitions in addition to those of the Local Plan and the Transport Strategy. The County Council requests that the City Council could review the role and profile of the PRoW network within its Draft Open Space Strategy 2024-2040</p> <p><u>Heritage Conservation</u></p> <p>The current text discusses green open spaces but doesn't appreciate the role of Canterbury's heritage in developing green infrastructure. If properly designed, green infrastructure has the potential to help new development be better integrated into the existing rural and urban landscape by ensuring that it fits into the grain of what is already there. The pattern of roads, tracks and lanes in the district has been used for centuries to link Canterbury's towns, villages, hamlets and countryside. By taking advantage of these existing and historic routeways people will be able to move through the area while retaining the historic geography of the region, but also following routes more likely to be accompanied by historic hedgerows and planting. This has the potential to unite heritage and ecology to help people access and enjoy green infrastructure more easily and naturally.</p> <p>Using historic routeways also allows green infrastructure designers to incorporate heritage assets to provide features of interest. In turn this will help people accessing the green infrastructure to become more aware of and value Canterbury's heritage which will in turn assist their conservation and re-use. For example, areas such as the Stour Valley, coastal promenades and the parks and gardens of Canterbury itself could all be linked in the green infrastructure network. This would also support tourism and well-being in the district.</p> <p>To fully appreciate the district's landscape character and incorporate it into green infrastructure effectively, it is first important to understand it. The main method for investigation historic landscape character is by historic landscape characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. An example of this in</p>

**Canterbury Local Plan Regulation 18 Consultation.
Kent County Council Response (May 2024)**

Policy/Paragraph	Commentary
	<p>Kent is the Hoo Peninsula.</p> <p>Green infrastructure also makes an important contribution to health. Historic England has released research that demonstrates how heritage actively supports health and well-being through contributing to a generally more attractive environment, allowing activities that encourage participation and inclusion and by encouraging outdoors activities.</p> <p>Canterbury has an outstanding collection of parks, gardens and green spaces, within Canterbury itself and across the district. It is important to assess the historic contexts of these in order to understand the role that they play in the landscape and could play in Green Infrastructure networks. The County Council has for the past few years worked closely with volunteers from the Kent Gardens Trust to review sites in the Kent Gardens Compendium and elsewhere and bring the reports up to a standard appropriate for use for planning purposes and potentially for inclusion in a Local List. The County Council strongly recommend that the City Council consider implementing a similar project.</p>
Draft Sustainable Design Guide	
	<p><u>PRoW</u></p> <p>The County Council notes that this document makes only passing references to public access. However, it is welcomed that the guide acknowledges the contribution good design can have on promoting healthy lifestyles by making walking, cycling and low-carbon travel modes easy, safe and accessible, and providing or contributing towards a comprehensive green and blue infrastructure network (see Draft Local Plan Policy DS6, 10(d-e)). The County Council welcomes, also, reference to the Kent County Council's 'Framing Kent's Future' strategy for 2022-2026 (p9).</p> <p>The need for a Construction Environment Management Plan (CEMP) is supported; however, and in addition to environmental and waste aspects mentioned in Section 4.3, the County Council expects CEMPs to include recognition of local walking and cycling access, identifying the impact of development on those routes, and detail how each will be managed during construction to protect the public's safety and maximise their on-going convenience during the period.</p> <p>A list of information required to be submitted with future planning applications has been included in Section 9 (pp27-30).</p> <p>Section 9.4 - Waste and transportation (p29) encourages applicants to “<i>advise how active travel has been considered and encouraged in the design process</i>”. Cross reference with Section 6, where reference should be included to Active Travel is recommended. It is also recommend that a definition of Active Travel is included - the definition used by the County Council for its Active Travel Strategy is encouraged for consistency across the county:</p> <p>A Glossary could assist with understanding terms used within the guide and this is recommended to be included.</p>
Draft Infrastructure Delivery Plan 2024	
	<p><u>Development Investment</u></p> <p>The draft makes clear that Education and community infrastructure will be funded via section 106 – this is welcomed by the County Council.</p> <p>Ref IB1 – IB9 and ID1 to ID4 – no base date is recorded for the 'Estimated Cost' Section. For these references it is Q1 2022 – this should be updated within the drafting of the IDP.</p> <p>Within Part B, Schedules – the County Council's requirement for section 106 contributions towards expansion of necessary Household Waste Recycling Centres serving the new developments has been omitted from the draft IDP. This should be corrected.</p> <p>Waste management is mentioned in Paragraph 2.1 but Waste infrastructure has been omitted from further discussion/detail in the rest of the IDP – The County Council request that this should be rectified and appropriate reference made.</p> <p>Whilst the definition of Public Services (within the Draft Local Plan) includes Waste Management, individual strategic allocation policies refer to proportionate contributions towards primary healthcare and other necessary off-site <u>community</u> infrastructure. Inclusion of the County Council requirements should either site in Public Services and therefore, strategic site policies amended to include contributions to waste or to list waste under Community Services within the IDP.</p>