Draft Canterbury District Local Plan (2040)

Regulation 18 Consultation

Representations on behalf of Wates Developments Ltd

Wates Developments Limited

31 May 2024

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Executive Summary

Wates Developments Ltd ('Wates') have been promoting 'Land South of Bekesbourne Lane' individually and as part of a wider 'East Canterbury' strategic development area ('SDA'). The SDA (including Wates's site) was a proposed allocations in the former 2045 Reg.18 plan (October 2022). These have both been deleted in the latest 2040 Reg.18 plan (March 2024) alongside the dropping of the 'Eastern Movement Corridor' ('EMC') (that the SDA would partly have delivered) and the allocation of 'University of Kent' site (C12) for a new standalone settlement (among wider changes). In this context, our representations have reviewed the plan's spatial strategy and its supporting evidence base concluding that Wates's site and the wider SDA should be reallocated.

1. Bekesbourne Lane & East Canterbury

The Council's conclusions in the SLAA and SA assessments of Wates's site and the SDA are not supported by the evidence. Firstly, both sites should be considered suitable given vehicle access can be provided. Both sites can also come forward without the EMC and they have inherent factors that make them a sustainable location for growth: enabling the embedding active travel and public transport from the outset). Moreover, the sites can come forward quickly noting they are being promoted by Wates (a housebuilder) and Gladman (a promoter, which is part of a house builder). Their delivery can also suitably mitigate their landscape and ecology impacts.

2. Revised plan-period, housing requirements, and supply

Reviewing the revised plan-period, we conclude it should be extended by at least a year (to ensure the plan looks ahead at least 15-years). Secondly, at least an additional 2,787 homes (in the extended plan-period) should be allocated. This is to restore the c.10% buffer of flexibility (noting our requirement and supply amends) and if possible, the Council should seek to exceed this; noting there are wider reasons – such as affordable housing and economic development – to plan for more homes.

3. Revised spatial strategy and 'University' allocation

Wates note the dropping of the EMC and support the revised transport strategy and its wider aims and the plans continued development focus on Canterbury as the most sustainable development location. However, the allocation of the University site should be less preferrable compared to 'East Canterbury' as it is a more logical direction for growth, and as evidenced by existing modal transport patterns has a much greater potential to deliver the sustainable transport objectives. The University site also has inherent issues such as needing to demolish an 'outstanding' primary school to provide access, its development would inevitably have greater landscape impacts, and its delivery is uncertain noting there is no developer or promoter on board. A future SA should therefore test delivering the University site compared to 'East Canterbury' (without the EMC) as well as delivering both.

Conclusions

Taking the above together, the Council should revisit its housing requirement, the level of housing supply allocated, and reconsider its development options In doing so, Wates 'Land south of Bekesbourne Lane' site – either individually or part of a restored 'East Canterbury' SDA – should be a preferred location for development and therefore allocated to help meet the needs of the district.

Contents

1.0 Introduction

1.1 These representations have been prepared on behalf of Wates Developments Ltd ('Wates'). Wates has been promoting 'Land South of Bekesbourne Lane' – individually (as a potential site allocation expansion to Canterbury) and as part of a wider 'East Canterbury' strategic development area ('SDA') – through previous iterations of the emerging Canterbury Local Plan.

Context for these representations

1.2 Canterbury City Council ('the Council') is in the process of preparing a new local plan and originally consulted on the issues facing the district in 2020. This was followed by a 'Draft District Vision and Local Plan Options' consultation in 2021 and then most recently a 'Regulation 18 draft Canterbury District Local Plan' in October 2022.

1.3 The October 2022 Reg.18 draft plan sought to meet the development needs of the district between 2020 to 2045 (a 25-year plan-period). It identified an annual housing requirement of 1,252 dwellings per annum ('dpa') (Policy SS3) and allocated, among other sites, 2,177 homes at 'East Canterbury' (Policy C11). The 'East Canterbury' SDA – made up of three smaller parcels, including land controlled by Wates at 'Land South of Bekesbourne Lane' (Policy C13) – would also have delivered part of the wider 'Eastern Movement Corridor' ('EMC'). This was to be an outer road link to the east of the city centre. Wates submitted representations to the October 2022 consultation seeking some minor changes to ensure the plan would be more effective but overall supported the allocation of the 'East Canterbury' SDA and the local plan's wider aims.

1.4 The latest Reg.18 plan – published in March 2024 and currently being consulted upon – has changed significantly in comparison to the previous iteration. In summary, the following changes have been made:

- The plan period has been shortened from 2044/45 to 2040/41 (starting in 2020/21; equating to a 21-year plan period with – as of writing – 17 years remaining);
- The total number of homes allocated has been reduced by 4,149 (from 13,495 to 9,346 homes). This reduction is primarily made up of (1) the removal of a new 'garden community' at Cooting Farm (near Adisham) (3,200 homes – former Policy R1); and (2) the removal of the 'East Canterbury' SDA as an allocation (former draft Policy C11) which included Wates site (former draft Policy C13). Other sites have also been removed[1];
- The proposed EMC and the wider supporting transport strategy for Canterbury City has been dropped, contributing to the decision to remove the 'East Canterbury' allocation. A new transport strategy is proposed that – according to the Council – will *"provide more positive effects as it focuses on sustainable transportation rather than the previous Circulation Plan and the construction of new bypasses which would have required significant new road infrastructure"*[2]. This new strategy is bus-led and relies on

[1] As set out at Paragraph 3.34 in the CCC 'Development Topic Paper' (2024).
[2] Paragraph 3.29 of the CCC 'Development Topic Paper' (2024).

various improvements and enhancements to the bus network as well as the local active travel network;

- In the former October 2022 Reg.18 plan, Policy C26 identified that land north of the University of Kent (in the ownership of the University) may have potential to support the longer-term development needs of the district. This ambition is now proposed to be crystallised into a formal allocation in the latest plan as Policy C12: allocating the site as a standalone new settlement of 2,000 homes as well as supporting uses and infrastructure.

1.5 Noting the above changes, Wates object to removal of both 'Land South of Bekesbourne Lane' and the wider 'East Canterbury' allocation from the latest Reg.18 version of the plan. While the shift in transport strategy is noted and the revised strategy supported, the 'East Canterbury' site can deliver on that transport strategy, providing a location and form of development that focuses on sustainable transport, and was not in our view ever reliant on the EMC being in place. Moreover, there are wider concerns with the amendments made to this version of the plan in comparison to its former October 2022 draft, the spatial strategy (in particular for Canterbury), and the assessment of Wates' site. Consequently, we consider changes are required to the plan for Regulation 19 consultation stage to ensure that it can be found sound at a future examination.

Structure

1.6 In this context, our representations consider the following:

- **Section 2.0** sets out a review of the Council's assessment of the Wates's site and the wider 'East Canterbury' former allocation;
- **Section 3.0** details a summary of our review of the proposed plan-period, the housing requirement, and housing supply proposed in the plan;
- **Section 4.0** reviews the revised spatial strategy and the proposed allocation of the 'Land north of the University of Kent' site in comparison to former allocations at 'East Canterbury; and
- **Section 5.0** sets out a summary of our representations and our conclusions.

1.7 To support these representations, additional technical evidence has been prepared. These are appended to this report:

1 Housing Need and Requirements Technical Note (prepared by Lichfields);

2 Housing Supply Technical Note (prepared by Lichfields); and

3 Transport Note (prepared by Motion).

1.8 In addition, separate Landscape and Ecology evidence (prepare by SLR Consulting Ltd and Aspect Ecology respectively) has been prepared. These are referred to and summarised in this report and we can share the full reports with the Council at request.

2.0 Land South of Bekesbourne Lane and East Canterbury: Site Assessment

2.1 Wates has been promoting 'Land South of Bekesbourne' as a site that could deliver circa 645 homes by itself or come forward as part of a wider 'East Canterbury' strategic development area ('SDA'). This could come forward alongside land being promoted by Gladman and a smaller plot of additional land at 'Hoath Farm'. The wider allocation was proposed to deliver 2,177 homes alongside supporting infrastructure (including a primary school), a local centre, open space, a country park, and a potential water treatment plant. The SDA would also have delivered part the of the proposed EMC.

2.2 As aforementioned, Wates's site and the wider 'East Canterbury' SDA were draft proposed allocations in the 2045 Reg.18 plan (allocations C13 and C11 respectively). Both have now been removed in the latest iteration of the plan being consulted upon, as has the EMC. Noting this the below first sets out a review of the Council's assessment of the site in both the 'Strategic Land Availability Assessment' ('SLAA') (2024) and the latest 'Sustainability Appraisal (Reg.18)' ('SA') (2024) report. It also considers the reasoning for why the site is no longer proposed as an allocation as detailed in the 'Development Topic Paper' (2024).

The Council's review of the East Canterbury sites

Strategic Land Assessment Availability ('SLAA')

2.3 Wates's site in and of itself (Site 105) was first considered in the July 2022 SLAA. The 'East Canterbury' SDA – including Wates's land – has a more recent site assessment (Site 302) as detailed in the updated 'SLAA Addendum' report (Dec 2023). Both the assessment of Site 105 and Site 302 concluded similar uncertainties regarding their suitability.

2.4 The assessment of Wates's land alone (Site 105) in the July 2022 SLAA highlights the following:

- **Access and highways:** Noted that access could *"potentially be achieved from Spring Lane or given the size of the site, maybe Bekesbourne Lane to east but this would need to be informed by a Transport Assessment"*. Also notes, that improvements may be required to both Bekesbourne Road and Stodmarsh Road.
- **Landscape:** Noted that the site forms part of 'Canterbury Area of High Landscape Value'. Notwithstanding, the following conclusion is reached: *"Whilst if delivered on its own it could appear fairly separated from other development, it would read in conjunction with the existing allocated site: South Canterbury to south. Given the size of the site it's considered that there would be opportunity to provide open space and landscape buffers to mitigate some of the impact on the landscape."*
- **Hertiage:** Notes that the site boarders a conservation area but that *"it is considered likely that the site could be sympathetically designed to ensure that the heritage assets can be preserved"*.

2.5 Ultimately the Council's conclusion on the site was that it was not suitable because:

"Suitable access to the site has not been demonstrated to be achievable; and the site is located in an area with limited access to day to day services and public transport therefore future occupiers would be dependent upon private car to access day to day services."

2.6 The updated assessment of the wider 'East Canterbury' land (Site 302) similarly highlights:

- **Access and highways:** The assessment states that *"access could potentially be achieved from Dorset Road to the west or Bekesbourne Lane to east, however given the size of the site and potential yield, this would need further assessment to demonstrate suitability."* It also notes that improvements to the wider highways network would be required.
- **Landscape:** Concluded that *"the site is located within open countryside, however is adjacent to the existing built urban area and would read in conjunction with the existing allocated site: South Canterbury to south. Given the size of the site it's considered that there would be opportunity to provide open space and landscape buffers to mitigate some of the impact on the landscape."*
- **Heritage:** Recognition of nearby conversation area and listen buildings. Notwithstanding, *"it is considered likely that the site could be sympathetically designed to ensure that the heritage assets can be preserved."*

2.7 Ultimately the Council's conclusion on the wider SDA was the same as for 'Land south of Bekesbourne Lane'. As we set out below, Wates' do not agree with this conclusion and consider the site should have been deemed 'suitable' with evidence indicating that suitable access can be achieved and that landscape impacts can be suitably mitigated.

Sustainability Appraisal ('SA')

2.8 The latest 'SA (Reg.18)' report (Dec 2023) is supported by a site-by-site assessment of SLAA submissions made throughout the plan-making process. This assessment tests the individual sites against their impact on 14 different SA objectives (some of which are made up of various sub-objectives). Similar to the SLAA site assessments, both Wates's individual site and the wider 'East Canterbury' SDA are scored the same in terms of their impacts.

2.9 In this context, we have selected some of specific conclusions applicable to both site assessments within the SA:

- **Ecology:** 'Significant Negative Effect' ('--'). It notes that there are ecological designations nearby, albeit by contrast this is not identified in the SLAA as being a reason for the site to be considered 'not suitable'.
- **Landscape:** 'Significant Negative Effect' ('--'). It notes that *"due to the size of the site, character of the area, isolated location separate from the urban area and existing views, development would have a significant adverse impact on the surrounding open countryside."*
- **Historic Environment:** 'Significant Negative Effect' ('--'). It notes that the site is adjacent to several listed buildings and is partly within a conservation area, albeit again is a more negative conclusion than that in the SLAA which recognises the potential to mitigate heritage harm through appropriate design/layout.

- **Transport/highways:** 'Significant Negative Effect' ('--'). Noted that *"due to the existing nature of Bekesbourne Lane (several stretches single track with passing spaces), concerns about the ability to provide suitable access to the site and it would be a large-scale car dependent development."*

Development Topic Paper (2024)

2.10 The 'Development Topic Paper' (2024) notes that following the former Reg.18 consultation *"significant concerns regarding the suitability of the sites for allocation were raised"* (para 4.30). These are summarised as:

- There are concerns that the individual sites are reliant on each other to come forward and deliver the EMC (para 4.31);
- Kent CC Highways did not consider access via Dorset Road to be suitable (para 4.32) and raised concerns regarding the impact of the development on the wider highway network (including the ability of local roads to accommodate increased traffic) (para 4.33);
- The allocation was reliant on the delivery of the EMC (para 4.34) but this is now being dropped. Accordingly, *"without the EMC, the ability for development to mitigate the pressure on local roads is unclear"* (para 4.35);
- Concerns with proximity to Chequer's Wood and Old Park SSSI (para 4.37); and
- Concerns regarding loss of established sports facility (para 4.37).

2.11 Consequently, the East Canterbury 'SDA' and Wates's individual site were removed as draft allocations and do not now appear in this Regulation 18 consultation. Some of the reasons given above move beyond those identified in the earlier SLAA, but in any case, we consider the rationale set out within the Development Topic Paper is not roundly and reasonably formed. We address this, reviewing the Council's various assessments of the sites as follows.

Lichfields review

2.12 Reviewing the Council's assessments of the sites, we consider that Council arrives at the conclusion to remove the allocation erroneously on the points set out above. To demonstrate this, these representations are supported by additional site-specific evidence appended to these representations. In summary:

- **Site access:**

  The SLAA assessments concludes that both Wates' site individually and the wider East Canterbury SDA are not 'suitable' as no suitable access can be provided. We consider this is incorrect and to address this conclusion, these representations are supported by the 'Highways Overview' report prepared by Motion (see Appendix 3).

  Focusing on Wates's site (Land south of Bekesbourne Lane) individually, the Motion report concludes there are two potential access options that can be achieved via Dorset Road (see Appendix A of the Motion report), with these conforming to relevant design standards and demonstrating how suitable access could in fact be achieved along Dorset Road. Access can also be provided via Bekesbourne Lane (see Appendix B of the Motion report) and there is scope to widen the carriageway along this route to ensure suitable

width for a car to pass an HGV (see Appendix C of the Motion report). In relation to the wider 'East Canterbury' SDA, the Motion report notes that combining the sites provides greater scope for suitable access to the wider road network.

Consequently, suitable access can be provided to both Wates's site individually and to the wider 'East Canterbury' allocation.

- **Reliance on the EMC and highways impact:**

The 'Highways Overview' report (see Appendix 3) sets out a review of various development scenarios whereby Wates's site individually is delivered at scale of 300 and 650 homes without the EMC (the 'do minimum' scenario) and with the EMC (either delivered in part or in full) to either 2040 or 2045. Ultimately, it is concluded that a *"development of 650 units does not have a material impact on network performance. This is irrespective of whether the full EMC or partial EMC is implemented."* (Para 3.31). Consequently, Wates's site individually is not reliant on the EMC to come forward.

More widely, the 'East Canterbury' SDA can be delivered without the EMC being implemented either in part or in full. A wider development could still deliver a bridge over the railway line, connecting into the allocated development to the south, and this would enable greater provision of public transport services. Even without this bridge the wider allocation's full development's would be reliable.

Consequently, it is considered that there would not be severe impacts on the wider highway network and that there would be sufficient capacity to accommodate traffic.

- **Active travel and car dependency:**

The SA concludes that the site would "*be a large-scale car dependent development.*" While the SLAA concludes *"future occupiers would be dependent upon private car"*.

The supporting 'Highways Overview' report (May 2024) prepared by Motion (see Appendix 3) notes that the East Canterbury SDA benefits from the following:

a The site already has good walking connections to Canterbury city centre and is within cycling distance of both railway stations. The topography is also flat which helps encourage active travel (and can be contrasted with other locations around Canterbury City);

b There are existing buses with various existing local amenities nearby including schools, shops, and medical facilities located in Canterbury city. Given the site is located on the immediate edge of the city, these facilities will be far more accessible than development further away from the city edge. It will also benefit from the proximity of the amenities to be delivered as part of the South Canterbury site; and

c In addition, the development can deliver improved active travel, public transport, and other measures to reduce car dependency from the outset. This includes a community bus services, a Travel Hub, and both improved footways and cycleways to help embed active travel. Car club bays can also be provided to help limit private car ownership.

This is shown in the supporting 'Highways Overview' report (Appendix 3 – see table 4.10) that shows that in the area surrounding the Land at Bekesbourne Lane site 26% of

the existing residents travel to work using active travel (22%) or public transport (4%), with only 58% as a car driver. This compares to 19% active travel/public transport at the proposed new freestanding settlement at 'Land north of the University of Kent' (Site C12) (of which only 12% use active travel), where 73% drive to work as a car driver. These compare to the district more widely where 67% drive to work as the driver, only 7% use public transport, and 18% use active travel.

Given these inherent factors to the SDA (that equally apply to Wates's site individually), it would be wrong to characterise the development of the site on the edge of the city as being 'car dependent'. The evidence demonstrates that it is inherently well placed to embed active travel and reduce car dependency from the outset owing to its sustainable location. It therefore uniquely responds to the Local Plan's new strategic focus on delivering sustainable transport outcomes; if that is the objective, growth at East Canterbury is objectively the best location to achieve it.

- **Landscape:**

  The SLAA assessment for the sites notes that the development of either East Canterbury or Wates' site in isolation would either be read in conjunction with a rolled over allocation and buffers would likely mitigate 'some of the impact' on landscape. This would appear to conflict with the SA conclusion that the site is *"isolated"* and would have a *"significant adverse impact"* on the surround countryside.

  SLR Consulting Ltd have reviewed the landscape impact of the proposed development of Wates' site. Their work concludes that:

  1. The site has the ability to accommodate the proposed development without transformational landscape effects taking account of the existing character and the quality of the landscape;
  2. Its development would not affect significant views identified in the Canterbury Conservation Area Appraisal;
  3. It would present a logical extension to the existing and allocated built up areas to the east and south-east of Canterbury without affecting the wider rural setting of the city, nor affecting the identity of settlements to the east of the city; and
  4. It could improve public access to new viewing points to the Cathedral. This would increase the value of the landscape in terms of the spatial function within the AHLV.

  It should also be noted that the site abuts a railway to the south beyond which is an allocation for housing development. In this context, the landscape impacts of the site should be reappraised in the SA from its current conclusion that it would cause 'Significant Negative Effects' ('--'); noting that the site can mitigate its impact and even enhance public access to views of the Cathedral.

- **Ecology:**

  Wates have supporting ecology evidence prepared by Aspect Ecology – available at request – which confirms that the site is suitable. Noting also that a scheme will deliver a biodiversity net gain, the scheme's 'Significant Negative Effects' ('--') concluded in the SA report should be reconsidered.

Summary

2.13 Ultimately, the Council's conclusions regarding the former 'East Canterbury' SDA allocation and Wates's individual site are not supported by the evidence. Suitable access can be provided to both Wates's site individually and the 'East Canterbury' SDA. Both can come forward without the EMC (delivered either in full or in part) and the site has factors that means it is inherently a sustainable location: enabling the embedding of active travel and public transport from the outset and successfully achieving and delivering upon the Plan's objectives around sustainable transport outcomes. Moreover, while the site will have an impact on the landscape this can be mitigated and as can the development's impacts on local biodiversity: noting a net gain will need to be achieved.

2.14 Moreover, the site can come forward relatively quickly within the plan period. Given the site was a former allocation, work has been undertaken by Wates and Gladman to masterplan and develop proposals on an ongoing basis. Assuming the plan is adopted by March 2026 (as per the latest Local Development Scheme [2024]) then Wates would be able to bring forward an application swiftly for circa 600 homes and deliver the site itself. Completions could then start from c.2031 (noting known median lead-in times as per Lichfields 'Start to Finish' [3rd Ed] report [2024]) and the site delivering in full within the plan-period.

2.15 Noting the above, the next sections of our representations focus on reviewing the revised plan and its proposed spatial strategy.

3.0 Review of Revised Plan-Period, Housing Requirement, and Housing Supply

3.1 The below details a review of the key housing requirement and supply elements of the revised draft plan.

1. The plan-period

3.2 Draft Policy SS3 sets out a revised plan-period starting in 2020/21 and ending in 2040/41: totalling 21-years. This compares to a 25-year plan period proposed in the October 2022 Reg.18 draft plan. The justification for the shorter plan period – as per the 'Development Topic Paper' (2024) – stems from a change in the preferred development strategy for the district.

3.3 The NPPF (Dec 2023) requires strategic policies to – as a minimum – look ahead 15-years (Para 22). The current draft plan is only at the Reg.18 stage and there are just under 17 years left to the end of the proposed plan-period. Noting this, the Council's latest 'Local Development Scheme' (March 2024) assumes that the plan will be submitted for examination in June 2025 and that adoption will follow in February/March 2026.

3.4 If this timeline was met, then the Council would only have at most a 15-year and one month plan-period. Any delay to the plan's adoption would mean that policies would not look ahead over at least a 15-year plan period (as set out in Table 3.1 below). Consequently, the plan-period should be extended by at the very least one year to ensure the plan will be consistent with national policy (NPPF Para 35[d]) at the point of adoption. This has wider implications for the housing requirement and supply (considered below).

Table 3.1 Plan Period Comparison

	Council Revised Plan Period	Lichfields Proposed Plan Period
Plan Period	2020/21 to 2040/41	2020/21 to 2041/42
Total no. Years.	21-years	22-years
Remaining Years at point of planned adoption	15 years, 1 month	16 years, 1 month

Source: Canterbury Local Plan Reg.18 (March 2024), Lichfields Analysis

2. The housing requirement

3.5 The Council's proposed housing requirement is 1,149 dpa (Policy SS3). This equates to a total requirement of 24,129 homes over the proposed 21-year plan period (as per Table 3.2). The requirement – as per the 'Development Topic Paper' (2024) – is set at the 'uncapped' standard method[3].

[3] Taking a 10-year baseline figure from 2023 and using the 2022 affordability ratio. See Table 2.1 of the topic paper for more detail.

Table 3.2 Proposed Housing Requirement

	Annual Requirement	Total Plan Period Requirement
Policy SS3	1,149	24,129 (21-year plan period)

Source: Canterbury Local Plan Reg.18 (March 2024),

3.6 These representations are supported by a 'Housing Need and Requirement' technical note (prepared by Lichfields – see Appendix 1). This note sets out a review of both relevant policy and guidance related to setting a housing requirement and the proposed requirement in Policy SS3. In summary, the note concludes that the housing requirement will need to be revisited because:

- The inputs to the standard method for local housing need have changed; and
- There hasn't been sufficient consideration as to whether the Council should seek to exceed the standard method which is the minimum starting point for setting a housing requirement.

Updated local housing need

3.7 The inputs to the calculation of local housing need have updated since the Council's latest assessment[4]. Planning guidance (ID: 2a-008) requires LPAs to revised their calculation of local housing needs throughout plan preparation up to the point of submission. Using the latest inputs, the current 'uncapped' figure[5] has increased to 1,170 homes per year. The 'capped' local housing need figure has however fallen slightly in the updated assessment to 1,141 homes per year.

3.8 We conclude that the Council should, as a minimum, revise its requirement to reflect the latest 'uncapped' figure (as set out in the supporting 'Housing Need and Requirement Technical Note' [see Appendix 1]). This would equate to delivering 24,570 homes across the Council's proposed 21-year plan period, rising to 25,740 homes across our revised 22-year plan period (as per Table 3.3 below).

Table 3.3 Lichfields Amended Minimum Plan Period Requriement

'Uncapped' Local Housing Need (2024 Base Year, 2023 Ratio)	Total 21-Year Plan Period Requirement	Total 22-Year Plan Period Requirement
1,170 per annum	24,570	25,740

Source: Canterbury Local Plan Reg.18 (March 2024), Lichfields Analysis

Consideration for going above local housing need

3.9 As detailed in the supporting technical note (Appendix 1) the Council has not demonstrated that it has followed relevant policy and guidance in respect of setting its housing requirement. In particular, whether this plan should seek to exceed – to a much greater

[4] As detailed in Table 2.1 of the 'Development Topic Paper' (2024).
[5] Using a 2024 base date and the latest 2023 affordability ratio.

degree – its capped standard method figure. This conclusion is reached with reference to the following:

- **Exceptional circumstances:**

  The supporting 'SA Report (Reg.18)' (2024) states that deviation from the standard method and the implementation of a higher housing requirement needs to be justified by demonstrating there are 'exceptional circumstances' (Para 5.3.21). In making this conclusion, the report discounts options for going above local housing need as (1) there are no local exceptional circumstances for doing so; and therefore (2) going above would conflict with national policy.

  This is a misinterpretation and misrepresentation of relevant policy in the NPPF (Paras 60 and 61) and relevant guidance (ID:2a-015). In this context, seeking a higher housing requirement above the standard method figure in Canterbury would not conflict with national policy, it would be consistent with it (and there is no need to demonstrate exceptional circumstances for doing so). The Council has therefore erroneously discounted such options.

- **Considering wider reasons for going above:**

  There is no detailed consideration as to why it might be appropriate – other than simply to deliver more homes – to implement a higher housing requirement. The SA Report (Reg.18) (2024) simply notes that *"the level of growth required under the standard methodology will help facilitate affordable housing, infrastructure and employment growth"* (para 5.3.21). Considering potential reasons for planning for greater housing delivery:

  a) **Affordable housing needs:** There is an admission that the plan will leave over 3,200 homes worth of affordable housing need going unmet (in the 21-year plan period). There needs to be consideration of whether planning for more homes overall would help the authority either meet or, at the very least, reduce the levels of unmet affordable housing need. This is noting that Canterbury has one of the highest housing waiting lists in Kent (2,809 households as at 2023).

  b) **Housing and economic growth:** The Council is planning to deliver a supply of employment land – totalling 31 ha – consistent with the 'Labour Demand' projection as per the 'Canterbury Economic Development and Tourism Study Focused Update' note (2023) (prepared by Lichfields). This scenario is based on converting Experian forecasts into floorspace. The same note also projects the potential employment demand arising from housing growth alone (i.e. the 'Labour Supply' scenario). This scenario outputs a land demand of 13.2 ha: less than half the 'Labour Demand' figure.

     Consequently, there is a significant mismatch between the quantum of employment land and the number of homes allocated. This will mean there is insufficient homes locally to support economic growth, acting as a potential barrier to investment (noting the requirements of NPPF Para 86c). It will also result in greater in-commuting to the district, resulting in less sustainable travel patterns.

  c) **Housing needs of other groups:** Finally, the Council needs to consider the needs of other types of housing: in particular, the student population in the city of Canterbury. The Council should update its assessment of housing need for students

(including with reference to more recent statistics on international in-migration being driven by student populations) and correspondingly consider whether an uplift in the housing requirement is necessary (as required by NPPF para 63).

Summary

3.10 Considering the above, the Council will first need to revisit the housing requirement to account for the extended plan period and the updated local housing need figure. It will then need to consider whether it should plan for additional homes above local housing need given the reasons above. Doing so would ensure the plan is positively prepared and justified.

3. The housing supply

3.11 In total, the plan makes provision for a total of 26,467 homes across the plan period. This is made up of 1,952 homes already delivered (between 2020/21 to 2022/23) with the remaining supply expected to be delivered to 2040/41. Comparing this supply figure against the Council's proposed requirement, it can demonstrate a notional 9.7% surplus.

Table 3.4 Proposed Housing Requirement

	Existing Delivery (2020/21 to 2022/23)	Remaining Supply (2023/24 to 2040/41)	Total Supply
Canterbury CC Position	1,952	24,515	26,467

Source: Canterbury Local Plan Reg.18 (March 2024), Development Topic Paper (2024)

Table 3.5 Canterbury CC Requirement Compared to Supply

Canterbury CC Position	
Annual Requirements	1,149 (Policy SS3)
Total Requirement	24,129 (21-year plan period)
Council's Supply	26,467
Shortfall / Surplus	+2,338 (+9.7%)

Source: Canterbury Local Plan Reg.18 (March 2024), Development Topic Paper (2024), Lichfields Analysis

3.12 These representations are supported by a 'Housing Supply' technical note (prepared by Lichfields – see Appendix 2). This note sets out a detailed review of the Council's Five-Year Housing Land Supply ('5YHLS') position and the plan's trajectory. In summary, the note concludes that additional sites are needed to ensure the plan is positively prepared and effective:

- **Five Year Housing Land Supply:**

  The plan as proposed is currently unable to demonstrate a sufficient five-year land supply. Using the Council's preferred 'Liverpool' method for dealing with the shortfall, the plan can only demonstrate a 4.40-year supply. However, the Plan provides the opportunity to address land supply issues and ensure an appropriate mix of sites that can continuously demonstrate a land supply as and when needs are arising, rather than

deferring them later into the Plan period to reflect a trajectory (as per the 'Liverpool' approach). Using the Government's preferred 'Sedgefield' method – as per the PPG – the Council can only demonstrate between a 3.66 to a 3.75-year supply[6].

To ensure the plan accords with national policy and is effective, additional sites need to be allocated to ensure that a five-year supply can be demonstrated both on adoption and well into that plan-period. This is to ensure a sufficient rolling supply can be demonstrated given protections afforded to recently adopted plans (as per NPPF Para 76);

- **Plan period supply and flexibility:**

  Looking at the total supply of homes across the plan-period, to ensure the plan is both positively prepared and effective additional sites need to be allocated because:

  a. As per our above analysis, the Council needs to be planning for its updated uncapped local housing need figure and consider going further above this (noting affordable housing need, economic growth, and the potential demand for student accommodation). In addition, the plan period should be extended by at least a year. These together mean that more homes will need to be planned for;

  b. Reviewing two of the key new site allocations: (1) Site C6 'Land at Merton Park' and (2) Site C12 'Land north of the University of Kent'[7], these are likely to deliver far later than currently expected given the work to bring them forward. As a consequence, we expect the two sites to deliver 1,430 homes fewer in the current plan period than the Council anticipate;

  c. Combining our amends to the requirement and supply means that in the proposed plan-period, the Council would only have a 1.9% buffer. In our extended plan period, this would reverse to a 0.8% shortfall: i.e. the plan would not be able to deliver its housing needs and therefore is not positively prepared;

Table 3.6 Total Identified Supply in Plan Period Compared to Lichfields Amended Requirement

Supply (Lichfields Amends)	Proposed Plan Period (2020/21 – 2040/41)	Extended Plan Period (2020/21 – 2041/42)
Identified Housing Requirements (Latest Uncapped Standard Method)	24,570 (21-year plan period)	25,740 (22-year plan period)
Total Supply (including delivery within the current plan period)	25,037	25,527
Shortfall / Surplus	+467 (+1.9%)	-213 (-0.8%)

Source: Lichfields Analysis of 'Development Topic Paper' (2024), Lichfields Analysis

  d. Canterbury has a history of difficulties and delays in bringing forward many of its strategic sites as illustrated by the largest allocations from the previous Local Plan (2017). For example, the previous plan assumed 'Land at South Canterbury Mountfield Park' would deliver 1,600 homes by 2022/23. So far no homes have

[6] Using either the Council's requirement or our updated uncapped local housing need figure (1,170 dpa)
[7] See Appendix 1 to our 'Housing Supply: Technical Note' (Appendix 2 to these representations)

been delivered. Also, the Sturry/Broad Oak site was meant to have delivered 740 homes by 2022/23, but only 31 homes have been completed by October 2023. This shows that a buffer of sites to account for flexibility is needed in the district.

e. Noting the above, we consider that the plan should seek to meet and exceed a 10% headroom of supply to ensure the minimum housing requirement is met. This would mean at least restoring the proposed headroom as currently planned for by the Draft Plan. To do so accounting for our amended requirement and supply amends would equate to the Council needing to allocate an additional 1,990 to 2,787 homes (in either the proposed or the extended plan-period).

Implications

3.13 In conclusion, the ensure the plan can be found sound (in all the dimensions of that test, set out at NPPF Para 35), the Council needs to revisit its plan-period, the housing requirement, and also allocate additional housing sites.

3.14 At least an additional 1,990 to 2,787 homes (in either the proposed or the extended plan-period) should be allocated. This is to restore the c.10% buffer of flexibility (noting our requirement and supply amends) and if possible the Council should seek to exceed this; noting there are wider reasons – such as affordable housing and economic development – to plan for more homes. Moreover, in the context that Canterbury's spatial strategy and trajectory has in the past been highly susceptible to delays on strategic scale sites (either in the planning or the delivery stages), we consider a headroom in excess of 10% would be both appropriate and necessary in Canterbury for the trajectory to be effective, and have the necessary flexibility to respond to changing circumstances.

4.0 Revised Spatial Strategy

4.1 The Development Topic Paper (2024) summarises how the new spatial strategy has been arrived at. First, different development strategies were consulted upon the in the earlier 2020 and 2021 consultations. From this work, the Council concluded that Canterbury should be the focus for growth (whatever the scale of development planned – with three options tested), followed by a development around the coast, and then last a free-standing development focus (with corresponding limited development in Canterbury and the coastal areas) (Para 3.4, Development Topic Paper [2024]).

4.2 The previous Reg.18 plan's preferred strategy was based on a development option called 'Canterbury Focus C'. This involved the additional of 14,000-17,000 homes in the district – focused in and around Canterbury city as the most sustainable settlement – alongside the delivery of the EMC. This new road would have in part been delivered by the 'East Canterbury' SDA – including Wates's site – alongside circa 2,177 homes on the cities eastern edge in an inherently sustainable location. The strategy also included a free-standing settlement near Aylesham at 'Cooting Farm'. This was pursued to meet a 'proportion of growth' albeit the principal focus of development was still Canterbury city (Para 3.19, Development Topic Paper [2024]).

4.3 Another spatial option previously tested was 'Canterbury Focus A' in which there would still be a focus on development in and around the city, but with the Council only meeting *"the minimum amount of development required by the Government"* (Para 3.24). The new Reg.18 plan – as per the Development Topic Paper (2024) – shifts strategy to the 'Canterbury Focus A' option, drops the EMC as part of the transport strategy, and correspondingly removes the 'East Canterbury' SDA allocation. In addition, the 'Cooting Farm' allocation has been removed and replaced by the 'Land north of the University of Kent' site.

4.4 The 'Development Topic Paper' (2024) notes that the revised strategy is now preferred due to the following reasons:

- Having considered the results of the previous consultation and taking account of the wider evidence base, the latest Reg.18 plan would align *"the spatial growth strategy with Canterbury Focus A would be the best reflection of concerns and minimise some of the significant negative impacts of the Local Plan"* (Para 3.27).
- In changing strategy, the topic paper highlights that when comparing the two development options *"'Canterbury C' included significant negative effects on Biodiversity, Landscapes, and Land Use compared to 'Canterbury A'"* (Para 3.25); and
- Taking account of new representations from the promoters of the 'Land north of the University of Kent' site – who sent the Council *"additional technical evidence to address matters of suitability and availability, including the provision of a secondary access point"* (Para 3.36) – the site was reassessed as being suitable and has now been allocated. The 'Cooting Farm' site was dropped in place of this site as it had particular impacts on the Kent Downs AONB and transport issues.

4.5 The below sets out a review of the proposed spatial strategy.

Review of the proposed spatial strategy

1) Dropping the EMC, its associated transport strategy, and as a result the 'East Canterbury' SDA

4.6 Two significant changes to the plan's strategy in respect of Canterbury city are (1) the dropping of the proposed EMC and the associated transport strategy for the city (with the introduction of a new 'bus led' strategy); and (2) the removal of the 'East Canterbury' SDA allocation (former allocation C11, including Wates's site which was allocation C13).

4.7 The removal of the EMC as part of the wider transport strategy for the city is acknowledged and the revised transport strategy can be justified and is broadly supported by Wates. Proposals to facilitate a *"shift to low-carbon and active travel journeys, particularly for short trips"* (Policy SS4[1]) are supported as is the new bus-led strategy along with its associated transport upgrades (Policy SS4[2]).

4.8 Notwithstanding, one incidental change of the EMC being dropped from the strategy is the deletion of the 'East Canterbury' allocation. As per the 'Development Topic Paper' (2024) this site has been removed at least in part due to the EMC no longer forming part of the strategy (para 4.34), alongside other reasons such as concerns regarding a suitable access. For example, the topic paper notes that without the EMC *"the ability for development to mitigate the pressure on local roads is unclear"* (para 4.35). Ultimately it is concluded that *"the site developers have been unable to sufficiently address the outlined concerns"* (para 4.36).

4.9 As detailed in Section 2 of these representation, Wates's position is that 'Land South of Bekesbourne Lane' can come forward either in and of itself or as part of the wider 'East Canterbury' SDA without the EMC being built (either in full or in part); with technical evidence to support this position. In this context, the removal of the 'East Canterbury' SDA can no longer be sustained on the basis of the EMC being dropped.

2) A new settlement at 'Land North of the University of Kent'

4.10 The revised plan seeks to allocate circa 2,000 homes at 'Land north of the University of Kent' (Policy C12). This would be a standalone settlement including a local centre, some business uses, and supporting infrastructure such as schools and open spaces. The site would also include some employment opportunities, but it does not appear likely that the development would deliver sufficient job opportunities to serve its future population (noting the employment floorspace and uses allocated); whom will therefore be reliant on commuting out to other employment centres.

4.11 In making this allocation, it needs to be recognised the former Reg.18 plan had sought to allocate a new settlement at 'Cooting Farm'. That development – to be located near Adisham some c.8km southeast of Canterbury city – was to deliver around 3,200 homes. This has now been deleted with the University site (C12) now preferred as an 'alternative' (as noted at para 3.37 of the 'Development Topic Paper' [2024]), though we note these are not necessarily like-for-like replacements, with the University site also replacing/displacing other growth proposals around Canterbury.

4.12 New settlements can be an appropriate way of delivering large numbers of homes and supporting infrastructure. This is highlighted at Para 74 of the NPPF (Dec 2023) which notes that larger developments need to be well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). There also needs to be a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites. Moreover, authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.

4.13 Noting the above, we have the following concerns with the University site in terms of delivering the quantum of homes expected and the lack of viability evidence:

- **Delivery:**

  As aforementioned, we consider that the site will deliver far fewer homes than expected within the plan period. The reasons for this are fully detailed in the supporting 'Housing Supply: Technical Note' (see Appendix 2). In summary though, the site appears to be at the very early stages of coming forward with it being noted that the site has 'limited planning activity' in the 'Development Topic Paper' (2024) (Table 8.7). There is a lack of supporting published evidence for the site of any kind and the site appears to be being promoted by the University themselves (not a developer or a promoter).

  We conclude that that the site may only deliver as many as 950 homes or potentially as few as 470 homes (depending on what lead-in time is applied) in the plan period compared to the 1,580 homes currently expected by the Council (see Table 13 and Table 14 in the 'Housing Supply: Technical Note', Appendix 2).

- **Viability:**

  There is currently no site-specific viability assessment for the revised University site proposal. There is a considerable infrastructure to deliver including public transport and active travel improvements, as well as community infrastructure. This includes not only a primary school to serve its own needs but also to re-provide the demolished 'Blean Primary School, which would be necessary to deliver up-front in order achieve satisfactory access to the site. This access strategy is particularly controversial locally; noting that the school is rated 'Outstanding' with little information as to how the school would be moved.

  It also includes land and contributions to *"primary towards early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure"* (C12[1v]). The site also needs to deliver a 20% biodiversity of net gain. Future iterations of the plan will need to be supported by such evidence to underpin this site and its deliverability. At the current point, we consider there are significant uncertainties as to how the site might come forward and its viability to deliver what is envisaged.

4.14 In addition, while the new settlement is posed as an 'alternative' to a former new settlement allocation, it should actually be compared to 'East Canterbury' SDA. This is noting that both would retain a focus of development on Canterbury, are of a similar size, but are in significantly different locations. We consider that the allocation of the University site as new freestanding settlement is less preferable to Wates' Land South of Bekesbourne Lane site both individually and as part of the 'East Canterbury' SDA. In making this conclusion,

the below sets out a comparison between the two sites in terms of meeting the SA objectives.

Comparing the 'East Canterbury' SDA to the University site

4.15 Comparing the two sites against the SA objectives:

- **Active travel:**

  As detailed in the supporting 'Highways Overview' report (see Appendix 3), the University site is located in an area of steep topography which limits wider pedestrian accessibility and is a 45-minute walk from Canterbury city centre. While improvements will be made, the site also has poor walking connections (noting that wider upgrades to narrow footpaths that need repairs will be needed). There are existing cycle connections to the city centre and north to Whitstable. However, the varying topography of the area again may limit use.

  Currently, only 12% of people already living around the University site use active travel methods to get to work compared to 22% of those already living by Wates's site at 'Land South of Bekesbourne Lane' (see Appendix 3, table 4.10). In this context, the development of the University site may not be able to facilitate a meaningful shift of trips to active travel (one of the district's key aims as set by draft Policy SS4). By comparison, the 'East Canterbury' SDA (including Wates's site) is inherently a location that would support active travel (noting its location and topography).

- **Public transport and car dependency:**

  The SA assessment of the site[8] concludes its development would have *"significant positive effects on access to public transport"*. It appears – based on the SA's testing matrix[9] – the significant positive effect on public transport is owing to the site being within walking distance (400m) to existing bus stops. This is rather than:

  a The site being relatively accessible by public transport in terms of number of and frequency of those services (other than being near stops) and being able to deliver public transport improvements to ensure the development will not be car dependent; and

  b Consideration as to the accessibility of railway stations by public transport or active travel.

  As per the 'Highways Overview' report (see Appendix 3, table 4.10), slightly more people living around the University site use public transport to get to work (7%) compared to 4% living by Wates's site at 'Land South of Bekesbourne Lane'. However, far more existing residents nearby the University drive (73% compared to 58%) and as aforementioned far fewer use active travel. It is therefore a location that is currently car dependent.

  In this context, the development of the University site would need significant improvements to public transport (and active travel) to reduce private car use from current high levels in the surrounding area. This is noting that both the SA review of the SLAA conclude that the site may be 'car dependant'. In comparison, a development on

[8] As detailed in the 'Sustainability Appraisal of Strategic Land Availability Assessment' report (Dec 2023)
[9] Table 3.3 'Sustainability Appraisal of Strategic Land Availability Assessment' report (Dec 2023)

the edge of the city at the 'East Canterbury' SDA would be in an inherently better position to embed greater public transport use, encourage active travel, and reduce car dependence (in an area where there is already less car dependency). Therefore, the 'East Canterbury' sites would better achieve the wider transport objectives of the plan (set out at Policy SS4) in comparison to a new settlement at the University site that is away from the city, its amenities, and job opportunities (upon which the settlement would be partly reliant).

- **Highways:**

  A new settlement at the University's land is unlikely to meet its own employment needs and future residents will need to travel to their places of employment. Future residents will also need to travel to access wider services (such as health care, retail, and leisure uses) many of which are located in nearby Canterbury. In this context, the University site is (1) less conducive to active travel (noting its topography); (2) is less well connected to Canterbury city via active methods (noting its distance from the city); and (3) has much greater existing reliance on private car use.

  Consequently, there will likely be greater impact from the development of 2,000 homes at the University site on the highway network compared to 2,000 homes on the edge of the city at 'East Canterbury'; as is confirmed by existing rates of car use. This is also noting the SA concludes that nearby roads to the University site are narrow, have witnessed several incidents, and that the development *"could cause significant negative impacts on the highway network, and it would be a large-scale car dependent development"*.

- **Land use:**

  The University site is noted in the SA as having mixed 'neutral' impacts on the land use objective (scoring '++/--'); suggesting it might be a more sustainable location compared to others including East Canterbury (which scored '--'). This objective is scored based on whether the site utilises brownfield land in its development; with sites using brownfield land scoring more favourably. The scoring for the University site reflects that its access utilises brownfield land; however, that access need involves the demolition of an existing primary school that will need to be re-provided within the wider greenfield site. The University development therefore does not support the re-use of brownfield land and the sites' contribution to the 'land use' objective should be reassessed.

- **Landscape and heritage:**

  Both sites are scored in the SA as having 'Significant Negative Effects' ('--') in terms of landscaping. As per our analysis above (in Section 2.0), Wates' site should be reappraised noting that the site can appropriately mitigate its impact (as concluded by both the Council in its SLAA assessment and in Wates's own work to date) and could even enhance public access to views of the Cathedral.

  Compared to this, the University site is inherently in a more sensitive location in respect of its landscape impacts. The site has a much more limited ability to accommodate the proposed change without transformational adverse effects, taking account of the existing character and the quality of the landscape. This is noting (1) the number public rights of way through the site (including the 'Crab and Winkle Way'); (2)

the fact it forms part of an existing 'Green Gap' that will be eroded; (3) its development would likely have a notable effect on the setting of the Conservation Areas and the Grade II* Listed Church of St Comus and St Damian; and (4) it would extend the built-up area of the city north into the wooded Stour Valley.

Conclusions

4.16 From the above, Wates note the dropping of the EMC and support the revised transport strategy and its wider aims. Wates also support the continued development focus on Canterbury as the most sustainable location in the district. However, the allocation of the University site should be less preferrable when compared to the 'East Canterbury' site.

4.17 In particular, if genuinely seeking to deliver a Plan that embeds sustainable travel (i.e. active travel and/or public transport) as part of its overall spatial strategy, East Canterbury is a more logical direction for growth, and as evidenced by existing modal transport patterns has a much greater potential to delivery the sustainable transport objectives sought by the Plan, being closer and better related to the existing City and centre than alternatives.

4.18 In this context, the Council should reconsider its development options and site selection noting that its spatial strategy is to focus development in and around Canterbury city in the most sustainable locations. Doing so should result in Wates's site – either individually or part of the 'East Canterbury' SDA – being a preferred location to the proposed new settlement at the University. In this context, a future SA needs to test a reasonable alternative of delivering the University site compared to 'East Canterbury' (as well as delivering both).

5.0 Summary and Conclusions

5.1 Canterbury City Council ('the Council') is in the process of preparing a new local plan and is currently consulted on a revised Reg.18 version of its draft plan. Wates has been promoting 'Land South of Bekesbourne Lane' – as part of a wider 'East Canterbury' SDA – through previous iterations of the emerging Canterbury Local Plan. These sites were proposed allocations in the previous iteration but have now been dropped in part owning to a shift in the transport strategy (as well as other technical concerns regarding the sites suitability and its impacts).

5.2 Considering the Council's latest assessments of both Wates's site individually and the wider 'East Canterbury' SDA:

1. The technical evidence provided demonstrates that suitable access can be provided and that the sites can come forward without the EMC being implemented (either in full or in part);
2. Moreover, the site in an inherently sustainable location from which active travel and public transport use can be embedded. This includes potential to better connect into existing bus routes that can be enhanced;
3. Its landscape impacts can be appropriately mitigated and would form a new logical extension to the city (noting development to the south of the railway line);
4. The site will deliver a biodiversity net gain and it suitable from an ecology perspective; and
5. Wates's site is developable noting that it is being promoted by a housebuilder alongside the wider 'East Canterbury' SDA which has the backing of Gladman (a site promoter, which is part of a housebuilder).

5.3 Overall, it is a site that the Council should support. Its delivery would support the Council's strategy to focus development in and around Canterbury, it would support the revised transport strategy, and it would support the wider objectives of the plan. It should therefore be considered for re-allocation in upcoming iterations of the draft plan.

5.4 In this context, we have specific concerns regarding the soundness of the current plan. This relates to the proposed plan-period, the housing requirement (and how it has been arrived at), and the overall supply of homes. Based on our requirement and supply amends (including the extending of the plan-period by at least one additional year) the plan as proposed will have a shortfall of 213 homes (equivalent to 0.8% of the total requirement). Therefore, to restore the circa 10% buffer for flexibility at least an additional 2,787 homes need to be allocated. Notwithstanding, more homes are likely required above this figure owing to the need to (1) seek to meet affordable housing needs; (2) address the imbalance in economic development and housing supply; and (3) noting that the previous plan's strategic allocations have been particularly susceptible to delay.

5.5 Next, we have reviewed the revised spatial strategy for the district – including the dropping of the EMC – and looked at specifically the newly proposed free-standing settlement at the 'Land north of the University of Kent' site (C12), comparing it to 'East Canterbury'. From this:

- The removal of the EMC as part of the wider transport strategy for the city is acknowledged and the revised transport bus-led strategy can be justified and is broadly supported by Wates. As are proposals to shift journeys to low carbon alternatives and active travel. However, the dropping of the 'East Canterbury SDA' as part of dropping the EMC is not justified (noting our evidence that Wates's site individually or as part of the wider 'East Canterbury' SDA are not reliant on the EMC);
- We have specific concerns regarding the proposed new settlement. In particular, given its current position we consider it likely that it will deliver far fewer homes in the plan period than expected. There is also a lack of evidence to support it – including viability evidence – and this will need to be forthcoming; and
- Reviewing the University site and comparing it to the 'East Canterbury' SDA, the 'East Canterbury' site better supports the overall objectives of the plan and its spatial strategy.

5.6 Taking the above together, the Council should revisit its housing requirement, the level of housing supply allocated, and reconsider its development options noting its spatial strategy to focus development in and around Canterbury city in the most sustainable locations. In doing so, Wates 'Land south of Bekesbourne Lane' site – either individually or part of a restored 'East Canterbury' SDA – should be a preferred location for development and therefore allocated to help meet the needs of the district.

Appendix 1 Housing Need and Requirements Technical Note

Appendix 2 Housing Supply Technical Note

Appendix 1 Transport Note (prepared by Motion)

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