



Canterbury City Council
New Local Plan 2040

Regulation 18 Consultation

3 June 2024



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1 INTRODUCTION

1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Canterbury City Council Draft Local Plan consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman has provided positive feedback to all stages of the plan preparation process of the emerging Local Plan to 2040, having engaged with officers and submitted representations to the following consultations:

- Issues Survey Consultation - Autumn 2020
- Vision and Preferred Options Consultation – July 2021
- Draft Local Plan to 2045 Regulation 18 consultation January 2023

1.1.3 The sections that follow below include specific comments from Gladman on the Council's preferred options covering a range of the topics and questions that have been posed.

1.1.4 Gladman Developments have five land interests in Canterbury which are being promoted through the emerging Local Plan. These include:

- Land South of Littlebourne Road, Canterbury for up to 1,400 dwellings (formerly identified in the previous Regulation 18 plan as part of the East Canterbury Strategic Development Area)

- Land north of Bekesbourne Lane at Hoath Farm, Canterbury for up to 67 dwellings (formerly identified in the previous Regulation 18 plan as part of the East Canterbury Strategic Development Area)
- Land at Cooting Farm, Adisham for up to 3,200 dwellings (formerly identified as a new garden community settlement in the previous regulation 18 plan)
- Land at Popes Lane, Sturry for up to 110 dwellings

Land at The Hill, Littlebourne for up to 300 dwellings

1.1.5 The sites are available, suitable, and deliverable for housing as summarised in section 5 of this representation. Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

2 NATIONAL PLANNING GUIDANCE

2.1 National Planning Policy Framework

2.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

2.1.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social, and environmental priorities and to help shape the development of local communities for future generations.

2.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Canterbury Local Plan provides a sufficient amount

and variety of land that can be brought forward, without delay, to meet housing needs.

- 2.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 2.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. Annex 2 of the Framework (2021) defines the terms “deliverable” and “developable”.
- 2.1.7 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2021).

3 LEGAL COMPLIANCE

3.1 Overview

3.1.1 The following section will discuss key legal requirements which Canterbury City Council must meet in the preparation of the emerging Local Plan.

3.1.2 Gladman consider that the SA fails to meet the requirements of National Policy Guidance, the 2004 Regulations and the Directive and as a result, cannot be considered sound.

3.2 Sustainability Appraisal

Legal Considerations and 'Tests of Soundness'

3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, local planning authorities must subject proposals in development plan documents to a Sustainability Appraisal (SA) and prepare a report on the findings of the appraisal.

3.2.2 The SA must incorporate the legal requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 and associated directive. The Directive sets out the relevant requirements and considers that the preparation and adoption of a Local Plan should be subject to an environmental assessment as defined in Article 2b), this will include the preparation of an 'environmental report' as defined by Article 2c) and involves information required in Article 5 and Annex I.

3.2.3 Chapter 11 of the PPG sets out a useful summary of the process and requirements of an SA:

"A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise

have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the plan.

Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so “with the objective of contributing to the achievement of sustainable development”. There is a separate requirement for spatial development strategies be accompanied by a sustainability appraisal under regulation 7 of both the Town and Country Planning (London Spatial Development Strategy) Regulations 2000 and the Combined Authorities (Spatial Development Strategy) Regulations 2018.

Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’). Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.”¹

3.2.4 Before stating:

“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.*

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently

¹ PPG Paragraph: 001 Reference ID: 11-001-20190722

distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.¹²

- 3.2.5 The SA process should clearly justify its policy choices in meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified, and transparent.
- 3.2.6 Gladman contend that the SA fails to meet the requirements of National Policy Guidance, the 2004 Regulations and the Directive and as a result the Canterbury Local Plan cannot therefore be considered an appropriate strategy for the purposes of NPPF Paragraph 35. The reasons for this view will be discussed below.

Assessment of Reasonable Alternatives

- 3.2.7 Gladman do not consider that all reasonable alternatives have been considered, as the University of Kent site has not been assessed against all other sites. Therefore, there is not sufficient evidence to suggest that this is the most sustainable option when compared with other large scale strategic settlements available in the district.
- 3.2.8 Had this exercise occurred, it would be evident that the University of Kent allocation would not represent the most reasonable approach. This is demonstrated in the table below which compares the chosen site with the omitted reasonable alternatives. As Land South of Littlebourne Road has not been assessed in the current SA, the scoring has been lifted from a previous iteration.

² PPG Paragraph: 018 Reference ID: 11-018-20140306

Table 1: SA Assessment of Reasonable Alternative

	SAO 1: Air Quality	SAO 3: Biodiversity	SAO 4: Geology	SAO 5: Landscape	SAO 6: Water	SAO 7: Flood Risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable community
Land South of Littlebourne Road (SLAA122)	0	--	--	--	--	++	--	++	?	++	++/--	++
Land South of Littlebourne Road (SLAA122) [No EMC]	0	-	--	--	-	++	-	++	?	++	++/--	++
Land at Cooting Farm, Adisham (SLAA267)	0	--	--	--	-	++	--	++	--	++	++/--	++
Land North of University of Kent (SLAA319)	0	--	--	--	--	++	--	++	++/--	++	++/--	++/-/?

Significant Positive Effect	++	Likely to have significant positive effects
Minor Positive Effect	+	Likely to have positive effects
Neutral	0	Neutral
Minor Negative Effect	-	Likely to have negative effects
Significant Negative Effect	--	Likely to have significant negative effects
Uncertain	?	Uncertain
No Relationship	NA	Not applicable/No relationship

- 3.2.9 As shown in Table 1, Land South of Littlebourne has the potential to perform better than, or at least comparably to the chosen site at Land North of University of Kent. The failure of the SA process to duly consider this reasonable alternative means that the evidence underpinning the spatial strategy and chosen allocations is insufficient and therefore the plan cannot be considered sound.
- 3.2.10 Furthermore, the reasonable alternatives should have been considered in the context of the removal of the Eastern Movement Corridor. Much of the potential harm associated with Land South of Littlebourne Road was associated with the delivery of this road, particularly that of heritage harm where the score reflects the potential for the proposed route to harm heritage assets further to the north.
- 3.2.11 Whilst the site was able to contribute to the delivery of this road, the site is deliverable without it and therefore the heritage harm is inaccurate and does not pertain to the delivery of residential development in this area.
- 3.2.12 Without the road, Gladman contend that Land South of Littlebourne Road should have scored '-', minor negative effect against SAO 9: Heritage. This is reflected in the table above/overleaf which again suggests that this is an entirely more suitable and sustainable site for residential development.
- 3.2.13 In addition, the Wetland Scoping Report (referenced in Table 3) submitted to officers should have resulted in the scheme receiving a '-' score in relation to both SAO 3: Biodiversity and SAO 6: Water.
- 3.2.14 To ensure that the Local Plan is capable of being found sound legally, it is imperative that the Council ensure that the SA is fully robust and provides an equal assessment of every reasonable alternative site to provide a transparent justification for their policy choices and site selection.

Strategic Housing Growth Options

- 3.2.15 Table 5-2- Summary of strategic housing growth options attempts to summarise why the standard method housing requirement is the most sustainable approach. However, the only notable difference in scoring pertains to SAO8: Waste

Management whereby LHN+10% and LHN+20% both score --/?. The justification states that *'The reduced quantum aligned to the LHN and shorter plan period is likely to be accompanied by a substantially lower amount of waste generated and greater opportunities for effective waste management than the previously assessed figure in the SA Report (2022). However, there is some uncertainty over the exact waste generated and ability to reuse waste generated through the construction phase.'*

3.2.16 Gladman disagree with this assessment as the SA is not intended to be a means of defining a total plan impact – it is not an EIA. Fundamentally, a negative score in one area does not imply that a particular spatial strategy is not suitable for progression. Just because a higher housing requirement scores negatively against a SO, that is not a reason in itself not for it to be pursued. The role of the SA is not to formulate policies, but to act as a guide/informant for decision makers/decision-making. Based on this, pursuing the minimum housing requirement based on waste management scoring (as the SO with the most significant difference in score) is an ambitious justification at best, and unrealistic and unsound at worst. This does not represent positive plan making, as the SA concludes that 'none of the alternative options were considered to perform any better in sustainability terms than the preferred option', and whilst this is current, the options did not perform worse than the preferred option and both the 10% and 20% uplifts represent the opportunity to deliver much needed market and affordable housing and suitable degree of flexibility for a plan that focuses on large scale residential development.

3.2.17 Gladman also consider that the written summaries for LHN+10% and LHN+20% do not reflect what is in the table. Table 5-2 scores LHN+10% and LHN+20% the same as the LHN for all but one SAO. The only minor changes pertain to uncertainty, rather than evidence of potential of harm. With regard to LHN+20%, it states, "The revised 20% uplift option is considered to largely perform similarly the 10% uplift option. With regards to housing (SA Objective 10) greater uncertainty over the ability to deliver the housing, given the much lower rates of completed development than this experienced in the district in recent years."

- 3.2.18 The suggestion that a higher housing requirement is not capable of delivering homes is questionable. A higher housing requirement results in more allocations, and more allocations mean more homes. It is accepted that the nature of the sites will impact when these homes will be delivered within the plan period, however, the SA goes on to (incorrectly) justify the selection of a new settlement to the north of the University of Kent. This is a site with highly questionable delivery rates and the typical risks associated with complex, large scale strategic development therefore requiring a plan with a suitable buffer to mitigate against these risks to delivery. It is unclear from the current available details whether a developer is currently attached to the site or whether it is being self promoted by the University of Kent which may add additional uncertainty to the delivery of the site.
- 3.2.19 Secondly, it is imperative to explore the reasons behind the level of under delivery in Canterbury before using them to attempt to justify the minimum housing requirement. Delivery in the district has been significantly hindered by nutrient neutrality, meaning that the level of delivery used to justify the lower housing requirement is not reflective of the context the plan will deliver homes in as solutions to nutrient neutrality are sought and implemented. As such, Gladman recommend that past delivery rates are not used to justify the use of a minimum housing requirement.

4 DRAFT CANTERBURY DISTRICT LOCAL PLAN 2040

4.1 Background

4.1.1 The Canterbury District Local Plan (CDLP) was formally adopted in July 2017 and sets out the spatial strategy and vision for the district for the period between 2011 and 2031. In addition, the Council developed the Herne Bay Area Action Plan which was adopted in 2010 and contained policies and proposals to achieve the regeneration of Herne Bay town centre.

4.1.2 The Council are in the process of developing a new Local Plan to run up to 2040, with early engagement commencing in 2020 through a public consultation focussing on the issues facing the district. The Council are now requesting responses on the draft Local Plan, which now has a reduced plan period to 2040. The implications of this change are explored in section 4.2.

4.1.3 The sections that follow below include specific comments from Gladman on the spatial strategy, district-wide strategic and development management policies within the draft Local Plan. Additional supporting representations provide specific comments on site allocation policies and Gladman's site interests.

4.2 Plan Period and LDS

4.2.1 Gladman broadly support the Council's timescales relating to the production of the new Local Plan as set out in the Local Development Scheme (March 2024) but note that significant work will need to be completed prior to the pre-submission draft preparation and consultation in July 2024-May 2025 to ensure the plan is sound. Gladman do not consider that this draft is sound in its current form. Gladman also consider that the expected submission date is overly optimistic given the large scale development proposed and the associated evidence base the plan will require.

4.2.2 With regard to the reduction in the plan period, Gladman consider this new plan period is insufficient when considering the scale of development proposed in the plan. Residential allocations that are likely to have longer lead-in times and begin

delivering later in a plan period, need to be set within a longer plan period. This is reflected in the NPPF at paragraph 22 which states:

“Strategic policies should look ahead over a minimum 15 year period from adoption¹³, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

- 4.2.3 It is not clear why the plan period has been reduced, therefore Gladman recommend that the plan period is extended to 2045 as per the previous consultation to facilitate the delivery of large scale residential development and the associated infrastructure. The housing requirement should also be adjusted accordingly, and suitable allocations be made to support the delivery of much needed homes.

4.3 Evidence Base

Canterbury Viability Update August 2023

- 4.3.1 The Canterbury Viability Update (August 2023) has been produced to consider the effect of affordable housing tenure against the accepted policy requirements from the 2022 Viability Study. Within these accepted policy requirements is 20% BNG. Notwithstanding that the policy requirement for 20% BNG is unsound and contrary to existing legal requirement, Gladman are concerned that it seems this policy is being pursued over an increase in affordable housing. It states;

‘The 2022 Viability Study included sensitivity testing with regard to changes in costs and values. Even with the recommended affordable housing mix, a 5% fall in house prices or a 5% increase has a negative impact on viability and would result in a significant number of the strategic sites becoming unviable. If the level of developer contributions was to be reduced, as a result of there being a lesser requirement for strategic infrastructure and mitigation measures, then the tenure mix and or the total requirement for affordable housing could be revisited.’

- 4.3.2 It goes on to say that other policy requirements such as CIL, developer contributions or environmental standards could be revisited. Gladman contend that this report makes clear that a 20% BNG requirement is unworkable and presents a significant

viability threat to the strategic sites within the plan. Rather, the Council should require the legal 10% BNG, in line with the Environment Act to facilitate the delivery of much needed affordable homes and not hinder the deliverability of large scale development sites. Planning practice guidance on [biodiversity net gain](#) states in paragraph 006 that *'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development.'*

4.3.3 Gladman also have concerns pertaining to the cost of infrastructure and the contributions that will be required from new development to support its delivery. For example, the Sturry Relief Road was expected to cost £29.6m but this has now almost doubled to £41.6m. Kent County Council state that this is due to exceptional inflation over this period, but it provides an indication as to how the cost such projects, that are essential to the delivery of development in Canterbury, can escalate and impact on the viability of development and the deliverability of the local plan.

4.3.4 The annex to the 2022 Viability Study notes that the Council is already planning at the margins of viability with relatively small changes in policy inputs or values having a negative impact on viability resulting in a significant number of the strategic sites becoming unviable (page 3). It also states that the 2022 Study also found that an increase in developer contributions of £10,000 resulted in fall in the residual land value of about £245,000/ ha on greenfield and £475,000/ha on brownfield sites. Given that there is potential for the developer contributions to be significantly higher than currently estimated Gladman have concerns that a 30% affordable housing requirement will make development unviable, and rather the Council should seek to increase affordable housing delivery through an increased housing requirement.

4.3.5 Fundamentally, Gladman do not consider the evidence on viability to be sufficiently robust at present to justify the proposed affordable housing requirements, or indeed other polices in the local plan. The Council will need to revisit its viability evidence to

take full account of the increasing costs faced by development from the policies proposed in this local plan.

Development Topic Paper

- 4.3.6 Gladman’s main concern with the Development Topic Paper is that 26,466 homes will be delivered over plan period 2020/21 to 2040/41. Using the evidence on supply provided in the Development Topic Paper of the 26,466 homes expected to be built over 68% will be delivered on sites of circa 400 homes or more. This includes 8,307 homes on large sites allocated in 2017 with a further 6,705 homes on five additional large allocations in this local plan – around 78% of the homes allocated for delivery on new sites. Therefore, the Council’s approach to this local plan is similar to that adopted in 2017 in that it seeks to deliver a significant majority of homes on larger sites. Gladman are broadly supportive of a large scale sites, but they must be set within a context of an appropriate evidence base confirming deliverability, a suitable buffer, realistic timescales and viability assumptions, and be the right site in the right place.
- 4.3.7 At present, the Council only have a 10% buffer between housing needs and supply. Given that nearly 70% of all homes are expected to come forward on large sites that nearly 6,000 homes are to come forward on just four newly allocated sites, a 10% buffer is insufficient flexibility to ensure, as required in paragraph 35 of the NPPF, that the plan is deliverable across the plan period. Appendix G of the Development Topic Paper adjusts the timescales for delivering the large allocations and they are not expected to come forward until 2029.
- 4.3.8 However, even these timescales appear optimistic given how long large sites can take delivery from validation to the first home being built. Lichfields has recently updated its “*Start to Finish*” report on the speed at which large sites are delivered. This shows that on average sites of 1,000 plus homes take around 6.5 years from validation to the completion of the first dwelling. Given that the plan is not expected to be adopted until 2026/27 at the earliest this would require these sites to come forward within 4 years of the adoption of the local plan. The same report also notes that sites of 1,000+

homes will take on average 2 to 3 years from validation to obtain an outline consent and a further 2+ years to obtain detailed. Whilst it is possible for such sites to come forward more quickly the evidence is not inconsistent with the Council's own experience with large sites as set out in the Development Topic Paper.

4.3.9 Gladman's concerns regarding the sites selected and overall strategy are detailed later in this representation, but primarily we are concerned that that the proposed strategy relies on a significant modal shift to from the private car to more sustainable forms of transport if the strategy for it to be deliverable and that the delivery of such a strategy will be more difficult in the Canterbury Urban Area which is the principle focus for development in the district. Evidence set out in the Transport Strategy is an indication that significant modal shifts are difficult to deliver, with this being made even more difficult in Canterbury due to heritage issues. This is explored in greater detail below, and within the appended Enzygo report.

4.3.10 Finally, whilst the council have included a trajectory in the Development Topic Paper it has not included one in the draft plan. The Council will no doubt be aware that paragraph 75 of the NPPF requires plans to include a trajectory and the council will need to ensure that one including in the next plan it is proposing to submit for examination.

4.4 Transport and Highways

East Canterbury

4.4.1 Please refer to Appendix 1 for a detailed transport representation regarding Gladmans land interests in East Canterbury. This transport representation draws on the transport work that has been carried out to date to support the former draft allocation in East Canterbury. It demonstrates that access to the sites can be achieved for all modes, including considerations of how this can be done on a phased approach. It also shows that the location of the site provides the opportunity to maximise accessibility for sustainable modes of travel and minimise vehicular traffic impacts on the local road networks.

- 4.4.2 The proposed development aligns closely with both local and national policies aimed at promoting sustainable transport, reducing car dependency, and enhancing community connectivity. The strategic infrastructure enhancements, such as the multi-modal bridge and expanded Park & Ride facilities, will provide crucial connectivity, and support the city's broader transport strategy.
- 4.4.3 The development's emphasis on local living, with community hubs providing essential services within a short walk or cycle, aligns with the National Planning Policy Framework's (NPPF) goals of creating healthy, inclusive communities. Investments in active travel infrastructure and public transport will reduce reliance on private vehicles, in line with local policy objectives to improve air quality and promote sustainable travel. Shared mobility options further support this transition by offering flexible, eco-friendly alternatives to car ownership.
- 4.4.4 The thorough planning and phased approach ensure that the infrastructure will be delivered in tandem with the development, enabling continuous progress towards a more sustainable transport network. Given these strategic benefits and the alignment with policy objectives, East Canterbury is well-positioned to contribute significantly to Canterbury's future growth and sustainability goals, making it a vital inclusion in the Local Plan

Policy CF8- Sturry Relief Road

- 4.4.5 Policy CF8 notes that development proposals that might prejudice this route will be resisted. Gladman contend that a funded and planned relief road does not require an accompanying restrictive policy. The policy does not explicitly state what would prejudice the route and therefore has scope to arbitrarily restrict otherwise sustainable development from coming forward. Housing allocations that contribute to the Sturry Relief Roads should have the contribution expectations clearly outlined within the policy wording and the route should be clearly shown on an accompanying policy map.

South West Canterbury Link Road

- 4.4.6 Gladman have significant concerns pertaining to the KCC costing, phasing, and delivery estimates. When considering the issues that have arisen in the past in securing and delivering (or lack of delivery of) significant highways infrastructure in the county, it is clear that an increased housing requirement is needed. This will ensure there is a suitable buffer and contribution funds can be generated in time with the expected delivery. Without a suitable buffer, any delays to delivery and viability constraints could present a significant threat to the delivery of the SWCLR.

4.5 Housing

Policy SS3- Development Strategy for the district

- 4.5.1 Gladman have several concerns with Policy SS3 and the housing requirement this policy sets for Canterbury. It establishes that between 2020/21-2040-41, 1,149 dwellings per year will need to be delivered to meet the housing needs of for the district, equating to an overall housing requirement of 22,980 homes across the plan period. This is based on the standard method without a cap, though it is noted that the current figure with a cap is 1,141, therefore this increase is nominal.
- 4.5.2 The housing requirement has also dropped due to the reduction in the plan period. Gladman have previously outlined concerns at the proposed plan period but note that when the plan period is extended to reflect the long term strategic nature of the sites within this plan, the overall housing requirement will need to increase too.
- 4.5.3 Gladman consider that at least two years needs to be added to the plan period but would recommend four years as a start date of 2020/21 is some time ago. In these circumstances, the housing requirement should be a minimum of 25,278-27,576.
- 4.5.4 Furthermore, there are significant affordable housing needs in the district that justify an increase in the housing requirement. The 2021 Housing Needs Assessment identifies an annual affordable housing need of 464 homes, which at the time equated to 41% of the LHN (1,120 dpa). This equates to 40.6% of the current LHN (1141 dpa).

4.5.5 The Council has acknowledged the critical need for affordable housing but rather than appropriately uplift the overall housing requirement in the Local Plan to viably deliver the needs of the district, they have simply removed the cap from the standard method calculation resulting in an additional requirement of only 60 dwellings over the plan period. This is insufficient in the context of a strategy that is reliant on large scale allocations with deliverability concerns (such as C12- Land North of University of Kent) which is likely to require a buffer and where affordable housing needs are so pressing.

4.5.6 Consequently, Gladman recommend that the Council increase the housing requirement to facilitate the delivery of affordable housing. This is in line with the PPG which states

'...there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.³*

4.5.7 This is an approach that has recently been pursued by East Riding of Yorkshire and has not been amended in the main modifications issued by the Inspector, therefore demonstrating that this a suitable approach and is one that should be considered in an area of significant affordable housing need.

³ PPG- Paragraph: 010 Reference ID: 2a-010-20201216

Policy C12- Land north of the University of Kent

4.5.8 Gladman have significant concerns regarding allocation C12- Land north of the University of Kent.

Site Assessments- SHLAA

4.5.9 The Council's evidence base clearly demonstrates why this site is not suitable. The table below has been lifted directly from the SHLAA, which concludes, without a doubt, that the site is not suitable for residential development. There has been no material change to any of the major constraints detailed and discussed in the SHLAA and therefore it is unclear how the conclusion that this is the most suitable and sustainable site for development has been reached. The table below reiterates information regarding significant constraints affecting the University of Kent Sites directly from the SHLAA. Every site was considered unsuitable for development.

Table 2: University of Kent SHLAA Site Assessment

	SLAA158- University of Kent Site C	SLAA158- University of Kent Site D	SLAA158- University of Kent Site E	SLAA158- University of Kent Site F	SLAA158- University of Kent Site B
Is this site within any of these designations: SSSI, NNR, AONB, Ancient Woodland, NE Priority Habitat, Flood Zone 2 and 3?	No	No	No	No- Site abuts SSSI, Natural England priority habitat and Ancient Woodland	Yes- Small area to south within National Forest Inventory Deciduous Woodland.
Is the site within, or adjacent to, a Local Nature Reserve or Local Wildlife Site (Y/N)	No	No	No	Yes- Adjacent to Little Hall and Kemberland Woods and Pasture LWS.	Yes- Part of Blean Pastures LWS lies within the site.
Is the site within, or adjacent to a Local Landscape Designation / Area of High Landscape Value (Y/N)	No	No	Yes- The entire site is covered by Canterbury AHLV	Yes- The entire site is covered by Canterbury AHLV.	No
Is it Best and Most Versatile agricultural land?	Yes- Grade 2 and 3	Yes- Grade 2 and 3	Yes- Grade 3	Yes- Grade 3	Yes- Grade 3
Is it in a water protection area: Groundwater vulnerability Groundwater Source protection zones	No	Yes- Slight overlap to the south with Groundwater vulnerability: Minor I1	Yes- Slight overlap to the west with Groundwater vulnerability: Minor HU	No	Yes- Groundwater vulnerability: Minor L and I1
Is it in a Minerals area?	No	Majority of the site is covered by KCC Minerals Safeguarding: Brickearth Other Areas.	No	No	Yes- South of site is covered by KCC Minerals Safeguarding: Brickearth Other Areas and KCC Minerals Safeguarding: River Terrace Deposits.

<p>Can you access the site (input from Highways). Are there Highway Capacity constraints? provide details (input from Highways)</p>	<p>Tyler Hill Road is the only road that serves Site C. Access would be created onto Tyler Hill Road by extending the site to the road otherwise the site would be set back from the road. Tyler Hill Road itself is a narrow road connecting Blean with Tyler Hill. Currently, it has no footway, cycle path or street lighting. It is likely that the road would need considerable widening to accommodate traffic flows, a new pedestrian footpath to either side and cycle paths.</p>	<p>Tyler Hill Road is the only road that could serve Site D. Access would be created onto Tyler Hill Road by extending the site to the road otherwise the site would be set back from the road. Tyler Hill Road itself is a narrow road connecting Blean with Tyler Hill. It is likely that the road would need considerable widening to accommodate traffic flows, a new pedestrian footpath to either side and cycle paths.</p>	<p>An access could potentially be constructed off of St. Stephen's Hill but this would need further assessment. This could potentially be curtailed by the location of the Scheduled Ancient Monument to the western part of the site (abutting St Stephen's Hill). To the north west of the site is the roundabout junction between Giles Lane, Canterbury Hill and St. Stephen's Hill. The site itself is bound to the north by a narrow private lane (CB44 public right of way). Highways assessment would need to be carried out on this site (perhaps in conjunction with site F) to identify what works would be required to enable the private road to accommodate the increased traffic flows from the development. Alterations may need to be made to the roundabout to the north west of the site to accommodate a</p>	<p>The site is not currently served by any roads capable of accommodating regular vehicular traffic, with the only access achievable from the north west of the site via a public footpath. This is proposed to be upgraded to provide vehicular access to the site. A highways assessment would need to be carried out (perhaps in conjunction with site E) to identify what works would be required at the lane and roundabout. It is noted that the property market appraisal identifies that the access constraints associated with site F will present challenges to any future demand for residential.</p>	<p>Tyler Hill Road is the only road that serves Site B, and this borders the site to the north. The information submitted suggests that vehicular access could be provided via the campus, specifically to Giles Lane and University Road to Whitstable Road, however this approach could have adverse impacts on heritage assets. The applicant is currently undertaking additional work to refine the access strategy.</p> <p>Tyler Hill Road currently a narrow road that does not possess any footways or lighting. It is likely that the road would need considerable widening to accommodate traffic flows, a new pedestrian footpath to either side and cycle paths. Mitigation likely required; this needs to be assessed in more detail.</p>
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			development of the size proposed. It is likely that the narrow lane to the north would be inadequate		
Footpaths, Public rights of way or cycle routes	There is a PROW along the eastern site boundary in the south (Crab and Winkle Way which is part of National Cycle Route 1), and a PROW cutting east to west through the site in the north. There are no footways on Tyler Hill Road.	A PROW runs along the southern boundary in the east of the site and a PROW runs along part of the western boundary. Tyler Hill road currently has no footway, cycle path or street lighting. The Crab and Winkle Way (National Cycle Route 1), is situated to the west.	There is a PROW running along northern boundary of site. There is a footway on the west side of St Stephen's Hill and on the southern side of the carriageway on Giles Lane. There are no dedicated cycle facilities nearby.	The site is bound to the north by a private lane (PROW CB44). This accommodates vehicles up until approximately the driveway to Alcroft Grange. From there the private road turns into a footpath. There are two other PROWs within the site - one is CB37 which runs centrally N to S. There is a further PROW running from the NW of the site diagonally through the western half of the site to the SE (CB47). There is a footway on the west side of St Stephen's Hill and on the southern side of the carriageway on Giles Lane. There are no dedicated cycle facilities nearby.	Multiple PROWs cross the site north to south and east to west. There are no footways on Tyler Hill Road. National Cycle Route 1 (Crab and Winkle Way) runs north to south through the site.
Heritage (scheduled monuments, listed buildings, conservation area, Archaeology)	The site does not contain any listed or locally listed buildings or scheduled monuments. The	The site does not contain any listed or locally listed buildings or scheduled monuments. The site is	The site is within the Tyler Hill Conservation Area. Approximately a third of the site falls within a Schedule	The site is entirely within the Allcroft Grange/Hackington Conservation Area. The site	The site does not contain any listed buildings but falls within the setting of listed buildings which would need

	<p>southernmost access from Tyler Hill Road falls within Blean and possibly Amery Court conservation areas which would need to be considered as part of any future development. This element of the scheme and the setting of the conservation areas would need to be considered as part of a masterplan for the site.</p>	<p>within the setting, if not slightly within, the Canterbury and Whitstable Railway conservation area which would need to be considered as part of any future development. This element of the scheme and the setting of the conservation areas would need to be considered as part of a masterplan for the site.</p>	<p>Ancient Monument It is likely that the Scheduled Ancient Monument would need to be safeguarded, whilst the development could impact the landscape character and overall setting of this part of the conservation area. The site does not contain any listed buildings, but the ridgeline of the site could impact long distance views of the Canterbury Cathedral World Heritage Site</p>	<p>does not contain any listed buildings, but the ridgeline topography of the site could result in the development impacting long distance views of the Canterbury Cathedral. The site does not contain any listed buildings.</p>	<p>to be considered as part of any future development. Part of the site consists of the Blean Conservation Area to the western third of the site, with the rest falling within the setting of that asset. The site contains a Scheduled Ancient Monument to the north west of the site (Dispersed Medieval Settlement Remains and Roman Buildings). It is considered likely that the site could be sympathetically designed to ensure that the heritage assets can be preserved. If however, the development of the site was to result in less than substantial harm, the benefits of the site would need to be weighed against the wider public benefits of the development of the site.</p>
<p>Townscape / Landscape</p>	<p>Townscape: The site is located approximately 200m from the village of Blean.</p>	<p>Townscape: The site is located outside the built confines of any settlement.</p> <p>Landscape: Impacts to landscape likely due to the</p>	<p>Townscape: The site is located adjacent to the built up University of Kent campus.</p> <p>Landscape: Open</p>	<p>Townscape: Whilst located outside of a settlement, there is an singular existing dwelling north of the site.</p> <p>Landscape: The site is</p>	<p>Townscape: The site is located outside existing urban boundaries in an area of relatively open countryside. In the south-west corner a small number</p>

	Landscape: Impacts to landscape likely due to the open countryside nature of the site.	open countryside nature of the site. However, the visual impact of the proposal is likely to be localised with views from the public footpaths and surrounding roads. Impacts could be mitigated with suitable design and screening.	countryside runs from the north, east and south of the site and therefore development would have an impact on the rural landscape.	located in an AHLV. Currently development in immediate proximity to this site is restricted to modest dwellings sparsely separated and surrounded by mature vegetation to the north of the site.	of residential properties on Tile Kiln Hill back on to the site. Landscape: The site is within the open countryside. Long distance views of the cathedral would need to be considered. Given the size of the site and topography it's considered that there would be opportunity to provide open space and landscape buffers to mitigate some of the impact on the landscape.
Gas pipeline	None	Yes, there is a high pressure gas pipeline through centre of site (it does not prevent development but would need potential reinforcements to enable the area to be used for residential)	Yes, an existing gas pipeline runs diagonally from NW to SE on the site	None	Yes- a High Pressure Gas Pipeline is situated within the north-east section of the site.
Contamination / Pollution	No likely contamination.	No likely contamination.	No likely contamination.	No likely contamination.	Small area of contaminated land to east (Tyler Hill pits).
Protected species	The site is within an orange area for Great Crested Newts.	The site is within an orange area for Great Crested Newts.	The site is within an orange area for Great Crested Newts.	The site is within an orange area for Great Crested Newts.	Site contains Ancient Woodland and Priority Habitat. The site is within an

					orange area for Great Crested Newts.
Trees (including TPOs)	Trees and shrubbery along the site boundary.	Site within the Blean Biodiversity Opportunity Area	Trees and shrubbery along the site boundary.	No TPO, no trees on the site but Ancient woodland/CA trees to NW and NE of site.	Ancient Woodlands (with TPOs) to the west, south west, east and dissecting the site down the middle laterally. There are a large number of non-protected trees generally located along field boundaries.
Is the site technically suitable for development? (If the nature and scale of the constraint is such that it can be mitigated - considering cost) (yes or further information needed but this is only if technical suitability hasn't been demonstrated - do not consider yield/design).	No - there are concerns regarding landscape impact; there is uncertainty about the potential to provide adequate access to the site; 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.	No - there are concerns regarding landscape impact; there is uncertainty about the potential to provide adequate access to the site; 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.	No - site is located entirely within a conservation area; there are landscape concerns; there are heritage concerns as third of the site falls within a scheduled ancient monument; and there is uncertainty about the potential to provide adequate access to the site.	No - site is located entirely within a conservation area; there are landscape concerns; there is uncertainty about the potential to provide adequate access to the site; 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.	No - suitable access to the site has not been demonstrated to be achievable due to heritage and ecology concerns.

5 SITE SUBMISSION PROFILES

5.1 Land off the Hill, Littlebourne

5.1.1 Gladman Developments Ltd (herein 'Gladman') are promoting land off The Hill, Littlebourne for residential development. The 15.77 hectare site, shown edged red on Figure 1 below, offers an ideal opportunity to continue growth in Littlebourne and develop a high quality, sustainable residential scheme that could make an important contribution to meeting housing needs in the District and help to continue to ensure the viability of local services and facilities within Littlebourne. It is identified as an emerging residential allocation in the Draft Local Plan 2040 under Policy R7.

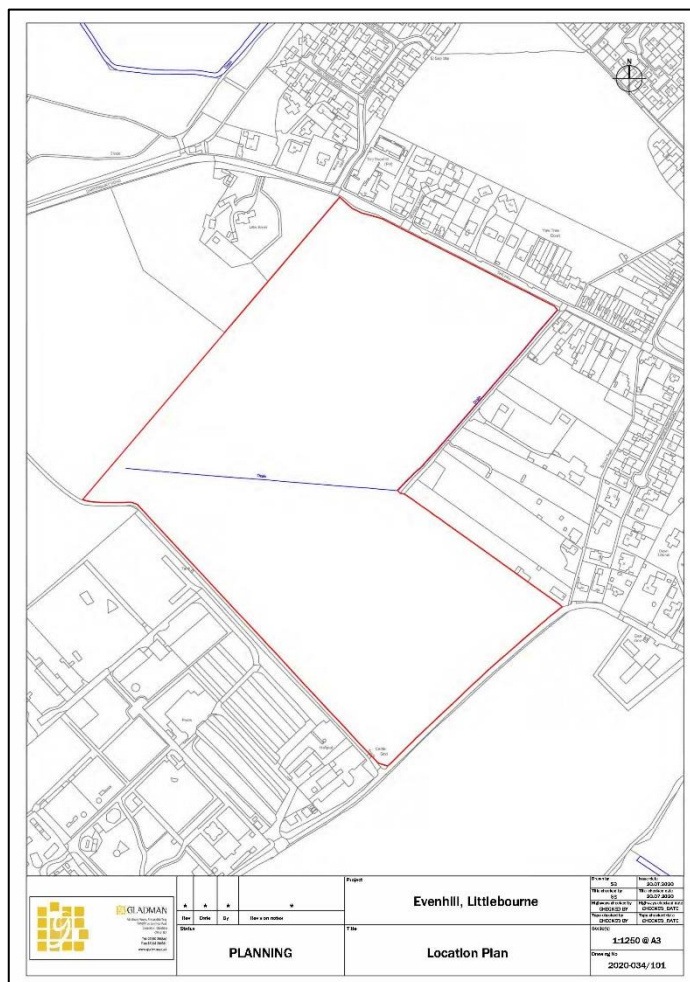


Figure 1: Site Location Plan- Land off The Hill, Littlebourne

5.1.2 The site is currently the subject of a live planning application (ref. CA/23/00484) for:

“Outline planning application for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children’s play area and surface water flood mitigation and attenuation. All matters reserved except for access.”

5.1.3 The proposals, illustrated on the Development Framework Plan overleaf, will deliver:

- Up to 300 residential dwellings at (including 30% affordable housing delivered in accordance with current adopted and emerging planning policy, and provision of older person accommodation);
- New access arrangements from the A257 The Hill and a second access on Bekesbourne Lane;
- Community allotments;
- Play provision including a Local Area of Play (LAP) and a Locally Equipped Area of Play (LEAP);
- A new community hub;
- Structural landscape planting and the retention and positive management of key landscape features; and
- Sustainable Drainage Systems (SuDS).



Figure 2: Illustrative Masterplan- Land off The Hill, Littlebourne

Site Location

- 5.1.4 The 15.77 ha site currently comprises fields in agricultural use and lies adjacent to existing residential development on the edge of Littlebourne. The settlement lies approximately 5km from Canterbury.

Access

- 5.1.5 As part of Gladman's submitted planning application on the site (reference: CA/23/00484) a detailed access appraisal has been undertaken and demonstrates that safe vehicular access can be achieved into the site off A257 The Hill and Bekesbourne Lane.
- 5.1.6 On site pedestrian and cycle accessibility is designed to provide safe and convenient links to the existing highway and footpath network. The site is sustainably located less than 5km from the east of Canterbury city and benefits from good public transport links creating less reliance on the private car. In addition, new pedestrian links and cycle routes will provide safe connections from the site to the bus stops along The Hill.

Littlebourne

- 5.1.7 With a population of 1,603 residents (2021 census), the Draft Canterbury District Local Plan 2040 identifies Littlebourne as a 'Rural Service Centre'.
- 5.1.8 Littlebourne benefits from a range of services and facilities, all of which would be accessible for future residents of the site on foot, thus reducing the need to rely on private vehicles. The current services available in walking distance from the site include, but are not limited to, Littlebourne Primary School; Four Hill Village Stores; Littlebourne Surgery; and Littlebourne post office. Given the scale of the site, there is an opportunity to deliver new community facilities on-site which would benefit new and existing residents alike. Necessary infrastructure requirements for school places, GP surgery etc. can be viably implemented and would be secured via planning obligations and conditions following the grant of any planning permission.

Policy R7 – The Hill, Littlebourne

- 5.1.9 Gladman support Policy R7 and the proposed allocation of 'The Hill, Littlebourne' for residential allocation of 300 new residential dwellings and associated requirements.
- 5.1.10 As highlighted throughout our representations, it is considered that some elements of the policy duplicate requirements set out in strategic and development management policies within the Local Plan, for succinctness and to align with guidance in the NPPF they should be removed from the policy wording.
- 5.1.11 Gladman note that Part 1b(ii) of Policy R7 requires the provision of an on-site Wastewater Treatment Works (WwTW) to demonstrate nutrient neutrality and ensure no adverse effect on the Stodmarsh designated site. Whilst the provision of an on-site WwTW comprises one solution to mitigating nutrients in the Stodmarsh catchment, it is proposed as part of the live planning application that credits are secured and therefore, provision of an on-site WwTW is not required. Hence, it is suggested that the policy is amended to allow flexibility for alternative nutrient mitigation solutions to come forward.

Conclusion

- 5.1.12 Gladman support the Council's aim to direct growth towards sustainable settlements within the district and particularly welcome the allocation of residential development at The Hill, Littlebourne.
- 5.1.13 Gladman submit that land off The Hill, Littlebourne remains suitable, available, and deliverable and fully support the emerging Local Plan's Policy R7 objective to deliver a carefully designed 300 residential dwelling scheme, open space and other uses within Littlebourne parish.
- 5.1.14 We are excited to continue engaging in constructive conversations about the site's future potential with the Council and local stakeholders and the opportunity it presents to deliver benefits to existing and future residents of Littlebourne.

5.2 Land off Popes Lane, Sturry

5.2.1 Gladman are promoting land off Popes Lane, Sturry for residential development. The 9.31 hectare site, shown edged red on Figure 1 below, offers an ideal opportunity to continue growth in Sturry and develop a high quality, sustainable residential scheme that could make an important contribution to meeting housing needs in the District and help to continue to ensure the viability of local services and facilities within Sturry.

5.2.2 Gladman welcome that the site has been identified as an allocation for residential development in the Plan under Policy R9.

5.2.3 The site is currently the subject of a live planning application (ref. CA/23/01743) for:

5.2.4 "Outline planning application for up to 120 residential dwellings (including affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation. All matters reserved except for access."

5.2.5 The proposals, illustrated on the Development Framework Plan overleaf, will deliver:

- Up to 120 residential dwellings at (including 30% affordable housing delivered in accordance with current adopted and emerging planning policy);
- New access arrangements from Popes Lane
- Play provision including a Local Area of Play (LAP) and a Locally Equipped Area of Play (LEAP);
- A picnic area set within green landscaping and footpaths;
- Natural and semi-natural open space with wildflower meadow;
- Allotments
- Structural landscape planting and the retention and positive management of key landscape features; and
- Sustainable Drainage Systems (SuDS)

Site Location

5.2.6 The site is located to the north of Sturry off Popes Lane and measures approximately 9.31 hectares. The site adjoins existing residential development in Sturry and forms a logical extension to the north of the settlement and is well contained within the landscape, while important trees and other landscape features will be retained.

5.2.7 Safe vehicular access can be achieved from Popes Lane to the south of the site and as part of the submitted planning application (reference: CA/23/01743), a comprehensive access strategy has been developed for the site to maximise connectivity to the local road network.

Sturry

5.2.8 The parish of Sturry has a population of 5,317 residents and the draft Canterbury District Local Plan 2040 identifies the settlement as a Tier 2, 'Rural Service Centre'.

5.2.9 Sturry benefits from a number of services and facilities including but not limited to, a primary school, independent school, doctors' surgery, Co-op convenience store and various other local businesses. All of these facilities would be within a 15 minute walk for future residents of the site, reducing the need to rely on private vehicles. In addition, the settlement benefits from Sturry Railway Station, which is located only 1km from the site.

Public Transport

5.2.10 The site benefits from excellent public transport links to locations across the south east of England, including London Bridge, London Waterloo, London Charing Cross, Canterbury, Ramsgate, Ashford, Sevenoaks and Margate through local bus services and frequent rail services.

5.2.11 The nearest bus stop is situated on Herne Bay Road, a short walk from the site, while Sturry Railway Station is 1km from the site and can be access by walking or the local bus service.

Policy R9: Land North of Popes Lane, Sturry

- 5.2.12 Gladman support Policy R9 of the Local Plan which proposes to allocate land north of Popes Lane, Sturry for 110 new homes and associated requirements.
- 5.2.13 As highlighted throughout our representations, it is considered that some elements of the policy duplicate requirements set out in strategic and development management policies within the Local Plan, for succinctness and to align with guidance in the NPPF they should be removed from the policy wording.
- 5.2.14 Gladman acknowledge the proposed green gap policy which overlaps with an area of Policy R9. Policy DS19 allows for sports and recreational uses within green gaps which does not significantly affect the open character of the green gap or lead to coalescence. Gladman are promoting Policy R9 for residential development and the proposed green gap aligns with the sports and recreational uses currently proposed within the development framework plan, notwithstanding this the policy should make provision to support blue and green infrastructure which supports development proposals.
- 5.2.15 Gladman note the policy requirement for the Sturry Relief Road to be fully operational prior to the occupation of any dwellings on the site. It is important that this requirement is supported by robust, up-to-date evidence of the impact that the proposal and other allocations in the plan will have upon the local highway network. If that evidence demonstrates that housing can come forward in advance of the completion of the Relief Road without having a severe impact upon highway capacity, development of much-needed housing on this and other allocated sites should not be unduly restricted from coming forward.
- 5.2.16 Gladman have considered and responded to the requirements for biodiversity net gain, tree cover and other development management policies within the main representations to the consultation submitted alongside this document.

Conclusion

- 5.2.17 Gladman welcome the allocation of R9 land off Popes Lane, Sturry for residential development and can confirm that the site is suitable, available and deliverable.
- 5.2.18 We are keen to continue engaging in constructive conversations about the site's future potential with the Council and local stakeholders and the opportunity it presents to deliver benefits to existing and future residents of Sturry.

5.3 East Canterbury

- 5.3.1 East Canterbury comprises three separate parcels of land that were previously draft allocated in the October 2022 Regulation 18 Canterbury Local Plan comprising of Land south of Littlebourne Road and Land north of Bekesbourne Lane at Hoath Farm which is being promoted by Gladman Development Ltd and Land south of Bekesbourne Lane which is being promoted separately by Wates Developments. The sites are located to the south-east of Canterbury, within a 20 minute walk of the city centre.
- 5.3.2 In order to bring forward a comprehensive development at East Canterbury Gladman have been working collaboratively with both Wates and the Canterbury City Council Planning Policy team since the October 2022 Regulation 18 plan.

5.4 East Canterbury - Land south of Littlebourne Road, Canterbury

Context

- 5.4.1 Gladman are promoting Land South of Littlebourne Road, Canterbury for residential development. The site is shown edged red on Figure 1 below and offers a unique opportunity to develop a high quality, sustainable residential led development that would make a critical contribution to meeting housing needs in the District.

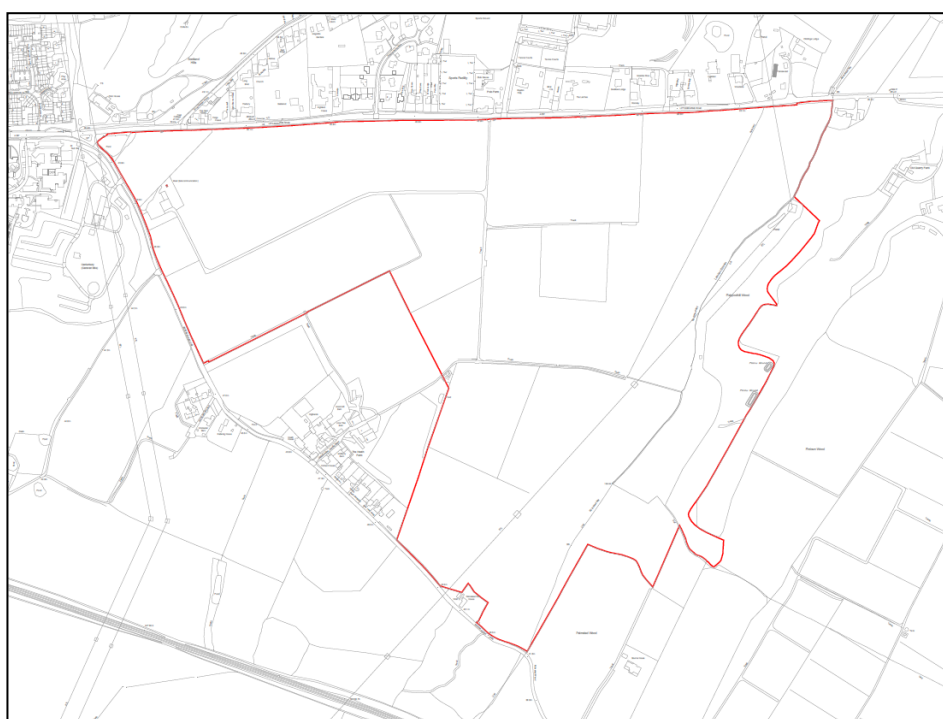


Figure 3: Site Location Plan- Hoath Farm

Location

- 5.4.2 The site is located on the eastern edge of Canterbury and fronting onto the A257. In this location, the site already benefits from good connectivity to Canterbury and other settlements in the wider periphery.
- 5.4.3 The site's strong locational links are reflected in commentary of the Strategic Land Availability Assessment (July 2022), which notes that that there are bus stops within

a 15-minute walk and within a 15-minute cycle ride there are: 7 key services, 4 strategic services, and 6 additional services.

5.4.4 Gladman are confident that land South of Littlebourne Road could come forward as a standalone site and has the sustainability credentials to do so. However, East Canterbury provides an important opportunity to deliver a new sustainable community and supporting infrastructure well located to Canterbury.

5.4.5 The previous Regulation 18 Plan Policy C12 draft allocated the site for approximately 1,400 dwellings, plus a new community hub, 3FE primary school, wastewater treatment works and open space. Criteria 2(a) of the Policy states that the site should be comprehensively masterplanned with Site C13.

5.4.6 In support of the sites, following the October 2022 Regulation 18 plan, a series of evidence base reports have prepared by Gladman and Wates, which demonstrated how the site would complement the growth of Canterbury, providing new homes and facilities, including commercial space, in a walkable community based on 'living locally' principles. These documents have previously been provided to the Policy team but an overview of each document and the conclusions is set out in Table 3 below.

Table 3: East Canterbury Evidence Base

Evidence base	Date provided to Canterbury City Council	Summary of conclusions
Strategic Transport Assessment		<p>A review of the junctions with LoS of C or worse show that out of the 21 identified junctions, only one (Junction 18 – A2050 New Dover Road / Old Dover Road) experiences a net change of flows of 30 vehicles as a result of the introduction of development at C12 and mitigation may not be needed without the provision of the EMC as it only performs with LoS of D in Scenario 3 only as opposed to LoS C in all other Scenarios.</p> <p>The impact in terms of flow change at all the other junctions is considered minimal and therefore only a proportionate contribution should be sought to mitigate them if future assessments support the requirement. Accordingly, further junction capacity assessments are required at the following junctions to ascertain whether mitigation is required, type of mitigation required, the trigger point for providing mitigation and proportionate impact from the development at C12.</p>
East Canterbury Bridge Costing Study	6 th December 2023	Concluded that there are three viable options for bridge design and provided detailed costings for each option excluding earthworks.
Masterplan Vision Document	6 th December 2023	This document demonstrated the Land east of Canterbury is deliverable, technically unconstrained and a sustainable location for new development. This document set out our initial overall vision for the site and explored a masterplan framework for achieving this vision.
Sustainable Movement Statement	6 th December 2023	<p>East Canterbury offers an excellent opportunity to establish a new, sustainable 21st-century garden community based on the principles of 'living locally.' The proposal includes new mixed-use</p> <p>The site's exceptional access to existing facilities, a well-established bus network, and comprehensive networks of public rights of way, footways, footpaths, and cycle routes exemplify its suitability for growth.</p>

		The site can deliver sustainable modes of transport, including buses and active travel, promote health and well-being while concurrently reducing carbon emissions and traffic within the city centre
Transport update letter	26 th January 2023	<p>The detailed traffic modelling, which was signed off by Kent County Council, and strategic assessments independently affirm that there is ample network capacity to deliver East Canterbury without the need for the Eastern Movement Corridor.</p> <p>Paired with our sustainability focus and holistic strategy, this modelling outcome positions us to deliver a development of the future at East Canterbury.</p>
Wetlands Scoping Report	20 th February 2024	<p>The site provides a unique opportunity to reduce nutrient discharge to Stodmarsh thereby enabling new development at the site to come forward within the catchment. The proposed 1.8ha wetland would have the potential to reduce Total Phosphate concentrations by 15% and Total Nitrogen concentrations by 16% in the Lampen Stream from discharging the Stodmarsh SPA.</p> <p>This reduction is attributed to the 15.62 sq/km upstream catchment and the Mountfield Park final effluent discharge. Further mitigation via onsite SUDS embedded within the proposed development, will reduce nutrient discharge concentrations further.</p> <p>Nutrients aside, the wetland will also provide betterment to downstream flooding on the Great Stour. The area the constructed wetland occupies also creates a floodplain where surface water run-off will be attenuated and released at a slower rate.</p> <p>Wetlands also provide valuable habitat for a diverse range of aquatic invertebrates, creating food for amphibians and consequently food for birds. Constructed wetlands provide an opportunity to enhance ecological value, which for Hoath Farm is particularly true and creates the opportunity to reverse decline and restore biodiversity.</p> <p>Overall, the proposed constructed wetland has both function and form that widely benefits the Great Stour River catchment and locally enhances bio-diversity without impacting development proposals. The constructed wetland can be incorporated into our masterplans defining how the development will be delivered in the future.</p>

5.4.7 As demonstrated in the submitted evidence base the site represents an opportunity to enhance the sustainability of the existing surrounding communities by providing a range of new on-site benefits.

5.5 East Canterbury - Land north of Bekesbourne Lane at Hoath Farm, Canterbury

5.5.1 Within East Canterbury Gladman are also promoting Land north of Bekesbourne Lane at Hoath Farm, Canterbury which was formerly draft allocated as Policy C14.

5.5.2 The 2.6 hectare site presents an ideal opportunity to create a sustainable, high quality residential development situated in a sought-after location as part of the wider comprehensive development being promoted within East Canterbury. As demonstrated on the masterplan vision document, this site could be brought forward as either a standalone development or as an enclave to East Canterbury, utilising high quality residential barn style design principles that would better suit the parcel's more rural context.

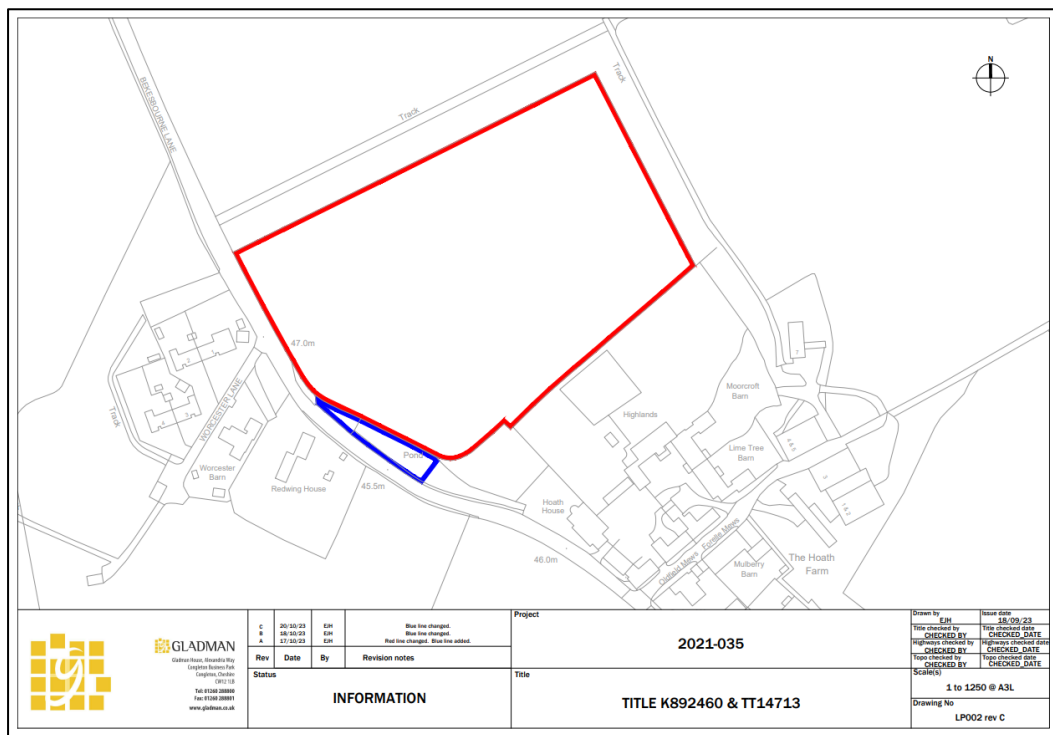


Figure 4: Site Location plan - Land north of Bekesbourne Lane at Hoath Farm, Canterbury.

5.5.3 A residential development on the site would incorporate both new market and affordable housing (of a variety of types, from affordable rented properties to discounted sale properties to help key workers and first time house buyers), to help meet the current and future housing needs of Canterbury.

5.6 Land off Adisham Road, Adisham

5.6.1 Gladman are promoting land off Adisham Road, Adisham for residential development. The 43.75 hectare site, shown edged red on Figure 5 below, offers an ideal opportunity to develop a sustainable, high quality, self- sustaining garden community that could make an important contribution to meeting housing needs in the District. It was previously identified as a residential allocation within the October 2022 Regulation 18 plan under Policy R1.

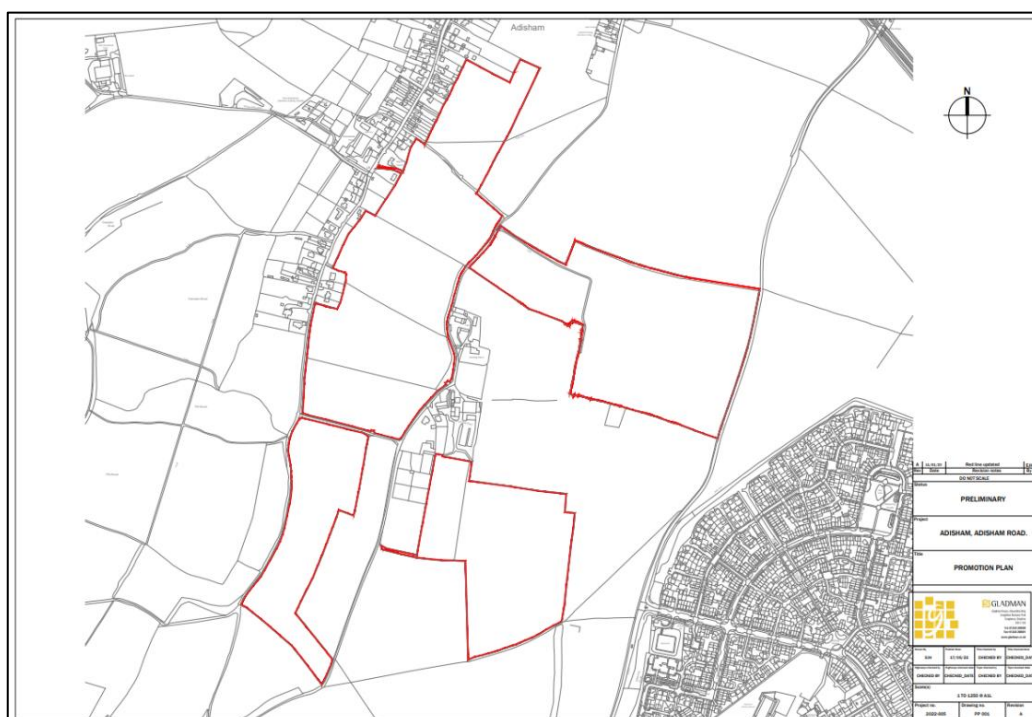


Figure 5: Site Location Plan- Cooting Farm

Location

5.6.2 The 43.75 ha site currently comprises fields in agricultural use to the south east of Adisham. The site is located within the Cooting Farm Garden Community which was draft allocated in the October 2022 Regulation 18 plan. The site provides an important opportunity to deliver a new sustainable community and supporting infrastructure.

- 5.6.3 The site was previously identified as a broad location for the development of a new garden community during the period of the Local Plan. Former Policy R1 allocated the site for approximately 3,200 dwellings, plus two new community hub, two 2FE primary school, and open space.
- 5.6.4 Gladmans land interests form a part of the site in former draft Policy R1 and we are committed to working proactively and collaboratively with the other landowners in the future to bring this allocation forward in accordance with garden city principals.
- 5.6.5 The location of the Cooting Farm Garden Community has the benefit of existing sustainable travel options that can be expanded to serve the quantum of development. The site benefits from close proximity to Adisham Station located on the northern boundary of the site and Aylsham Station located 1.5 miles from the site. Adisham has several bus stops through the village which offers two school services . Additional services are available from Aylesham with the No.89 offering the most frequent service. In support of these representations.
- 5.6.6 Gladman contend that the Cooting Farm Garden Community remains a logical broad location for a future Rural Garden Community.

6 CONCLUSIONS

6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the new Regulation 18 Local Plan being consulted on by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 6.1.3 We hope you have found these representations informative and useful towards the preparation of the March 2024 Regulation 18 Canterbury District Local Plan.
- 6.1.4 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at policy@gladman.co.uk.

APPENDICES

Appendix 1: East Canterbury Transport Written Representations



