



Planning and Development
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Date: 03 June 2024

Mr Andrew Thompson
Canterbury City Council

By email consultations@canterbury.gov.uk

Dover District Council representation to Canterbury City Council on the Draft Canterbury District Local Plan to 2040 Consultation (March 2024)

Dear Mr Thompson,

Dover District Council (DDC) welcomes the opportunity to comment on the Draft Canterbury City Local Plan to 2040 and provides comments below.

Development Strategy for the District

DDC notes that the draft Local Plan seeks to meet the Local Housing Need (LHN) as calculated by the standard methodology and its employment need (via the labour demand scenario in the Development Topic Paper (2024)) within the Canterbury City Council (CCC) District Boundary. This approach to meeting both housing and employment needs in full is supported in principle as set out in Policy SS3 and via the range of site allocations contained within the draft Plan.

Distribution of Development and Update to Comments on Previous Draft Local Plan and Planning Application CA-22-02055

DDC responded to the previous draft Local Plan consultation in early 2023 to raise objections to the proposals for development at Cooting Farm, Adisham and South Aylesham, citing in particular the impact of the proposals on the local highway network, particularly when considered in addition to the proposed site allocation on 'Land to the south of Aylesham' within the DDC Submission Local Plan. Additionally, the DDC response advised that the removal of a site to the north of Aylesham which had been included in the DDC draft Local Plan was carried out in response to concerns raised by the community about the scale of development proposed in the vicinity of Aylesham, though this had proposed a smaller scale of development than was proposed in the previous CCC draft Plan.

DDC therefore welcomes the removal of both the development sites at Cooting Farm, Adisham and South Aylesham.

In order to meet its LHN, the draft Plan proposes new and carried forward housing site allocations with a focus on the District's urban areas of Canterbury, Whitstable and Herne Bay, with smaller scale housing development proposed to sustain the rural/local service centres and villages. This approach is supported in principle and is in line with the aims of the NPPF.

Policy C17 – Canterbury Business Park

Canterbury Business Park (Policy C17) is proposed to be allocated for employment development and viticulture hub, which includes 35,500 sqm of B8 floorspace (reduced from 51,000sqm in previous draft Plan) and a limited amount of supporting uses. Nevertheless, given the scale of this employment site and its direct access to the strategic road network, DDC needs to understand the impact of the proposal to ensure it does not undermine or impact upon the agreed mitigation solutions for Whitfield and Duke of York roundabouts on the A2/M2 corridor.

The application permitted under reference CA-22-02055 for “Hybrid planning application for expansion of Canterbury Business Park comprising detailed proposal for 11,900 sqm winery with associated parking and landscaping; and outline proposal with all matters reserved except access for up to 8,000 sqm of warehousing” did not address this matter specifically, rather the capacity analysis carried out and the subsequent conditions imposed on the grant of permission focused on five junctions in the immediate vicinity of the site, within Canterbury District.

DDC advised in response to consultation on the CA-22-02055 application that DDC may need to charge the tariff for strategic highway improvements outlined in Policy SP12 of the DDC Submission Local Plan if proposals at Canterbury Business Park were found to have an impact on the SRN within Dover District, and, noting that the above application does not relate to the entirety of the site allocated under draft Policy C17, this remains the position of DDC in relation to future proposals which may come forward to ensure that the agreed mitigation solutions for Whitfield and Duke of York roundabouts through the DDC emerging Plan are not undermined or impacted.

Infrastructure Delivery

DDC notes that the proposed Canterbury Circulation Plan has been removed from this draft Local Plan, and that the draft Canterbury District Transport Strategy (2024) aims to unlock further growth in the district without significant new road building, focusing on delivering an enhanced sustainable transport network facilitated by the draft Canterbury District Bus Strategy (2024). While DDC raised no objection to the previous circulation plan, this approach via the draft Infrastructure Delivery Plan (2024) is also supported by DDC.

DDC continues to support the proposal for a new reservoir at Broad Oak as identified in the South East Water Resources Management Plan to increase capacity both within the Canterbury district and wider region.

Future Engagement

Pursuant to the above comments, DDC looks forward to engaging constructively with CCC as the emerging Plan progresses towards Regulation 19 and Examination stages in 2025/26.

Yours sincerely,

Sarah Platts
Head of Planning and Development
Dover District Council