



Planning Policy  
Canterbury City Council  
Military Road  
Canterbury  
CT1 1YW  
Planning Policy

Our Ref: 42654-WSPE-XX-XX-CO-Z-  
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12 January 2023

BY EMAIL

Dear Sirs

### **Draft Canterbury Local Plan Consultation**

In its capacity as landowner and promoter of the St Martin's West site in Canterbury, Homes England generally supports the Council's vision and objectives for the draft Local Plan. The general development policies, particularly those relating to housing and sustainable development are supported.

Homes England is the Government's housing accelerator, developing public sector land and investing in communities and collaboratively working with others to deliver homes faster, helping to improve neighbourhoods and grow communities. High quality design is very important to Homes England as are the principles of ensuring that new communities are designed with healthy living and nature at their heart. As such, Homes England is committed to delivering high quality homes and landscape as well as accelerating housing delivery to assist with meeting these objectives.

The St Martin's West site is a housing allocation for 200 homes under adopted Local Plan Policy HD1. Development of this previously developed site will deliver a mix of housing, including affordable homes, as well as formal open space and parkland for the benefit of the local community. As such, the site forms an important role in helping the Council meet its housing targets for Canterbury over the plan period, and Homes England supports the continued allocation of this previously developed site through the new Local Plan.

The St Martin's West site is available and is within Homes England's ownership. It is anticipated that, subject to achieving relevant planning approvals, development on the site could be delivered within the next five years. Homes England has undertaken pre-application consultation for the site with the community and Council officers and is preparing an outline planning application, anticipated to be submitted in early 2023. Therefore, it is expected that a housebuilder could start on site in 2025/2026 and that the site could be delivered in full by 2027/28.

With regards to housing delivery, Policy SS3 provides the development strategy for the District which sets out to focus development at Canterbury urban area. This strategy is supported although it is important not to restrict appropriate development in the smaller settlements. Focusing growth at Canterbury is considered to be a suitable approach which will enable a significant number of new homes to be delivered and will provide opportunities for economic

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development and investment in local transport infrastructure. This growth will assist in supporting local services and facilities within the City centre and surrounding smaller settlements.

The Local Plan seeks to deliver around 1,252 dwellings per annum between 2020 and 2045, a total of around 31,300 dwellings. A significant proportion of new housing is proposed at Canterbury including on allocated sites within the East Canterbury strategic development area. Homes England broadly supports the growth proposed for this area.

The target for providing 30% affordable housing on sites of 10 or more dwellings, or on sites of 0.5 hectares, subject to viability, is supported. Whilst the Local Plan includes a required affordable tenure mix, and the mix of sizes and types for market housing, it is important that these requirements enable some flexibility to ensure that housing delivery reflects current local housing needs. It also needs to ensure flexibility so that it is appropriate to particular sites. For instance, the type of market and affordable homes suitable for the St. Martins site will need to be suited to the symmetry of the site and the landscape setting with a combination of retained and new build homes. Housing requirements should also be based on scheme viability and, as such, should allow flexibility where the required mix cannot be achieved. On this basis, a site-specific approach to housing mix should be considered where appropriate, and it is recommended that Policy DS2 allows for this.

The opportunity for delivery of alternative types of accommodation or tenures is also welcomed where it is appropriate to the site.

The required density of 35dph for rural centres and urban areas is considered appropriate as is the inclusion of specific density requirements for the housing allocations. There does however need to be some flexibility to ensure that the density is appropriate to the site once more detailed technical and environmental work has been undertaken for the site that could indicate that a different density is appropriate.

The policies in the Local Plan relating to sustainable travel are generally supported. The specific requirements for EV charging in new developments where parking is to be provided is considered to be appropriate.

With regard to biodiversity net gain, all proposals for major development are required to demonstrate and deliver a minimum of 20% net gain. Whilst Homes England agrees with the objective for new developments to deliver biodiversity net gain, it should be noted that this is not yet legislation and is expected to be brought into effect in November 2023 with a requirement for 10% net gain. It is not clear what the evidence base is for requiring 20% rather than 10% BNG. As such, the requirement for 20% net gain should be based on the deliverability of individual sites, and development of these sites should not be resisted if this target cannot be achieved while delivering a viable scheme.

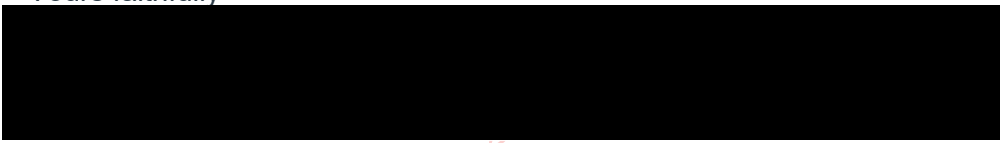
Policy DS21, Part 3b deals with the hierarchy of where/how BNG is achieved. It is important that this hierarchy accords with the approach taken at the national level. Off-site delivery of BNG outside of the local area is identified as an acceptable solution at national level, subject to necessary criteria being met, if local opportunities for off-site habitat creation or enhancement are insufficient to meet net gain requirements.

Land to the south of Sturry Road is a proposed allocation under Policy CS24 for the delivery of a strategic wetland as part of the Canterbury Nutrient Mitigation Strategy. Homes England supports this policy and the proposed role of the site in assisting the Council in dealing with the District's nutrient neutrality issue and offsetting the impact of new development.



I trust that these representations will be taken into account when finalising the Local Plan.

Yours faithfully



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