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3<sup>rd</sup> October 2025

Dear Sir / Madam

## **DRAFT CANTERBURY DISTRICT LOCAL PLAN – REGULATION 18 CONSULTATION**

On behalf of our client, W&S Mills Limited, please find enclosed representations to Canterbury District Council's ('the Council') Local Plan Regulation 18 Consultation (hereafter referred to as the 'Local Plan'). These representations relate to the continued promotion of Chartham Paper Mill ('the Site'), which is owned by our client. The entire site is in one single ownership.

### **The need for a Plan-led approach in Canterbury**

The decision to bring forward a new Local Plan is supported as the importance of creating an up-to-date Plan-led approach to planning for development cannot be understated. The Council's current Local Plan was adopted in 2017 and is out-of-date on the basis that many significant planning legislative changes have occurred since its adoption, including several significant changes to the NPPF within the most recent revisions published in December 2024.

It is important to note that the new Government, elected in July 2024, has committed to take a more proactive and positive approach to planning to previous Governments, including setting the target of the delivery of 1.5 million homes in England over the period of this parliament (likely to 2029). The Government has reiterated its "brownfield first" approach to site-selection which is enshrined in its flagship planning guidance the National Planning Policy Framework. The production of a new Local Plan for Canterbury will play an important part in meeting these ambitions.

The 2023 Housing Delivery Test (HDT) results were published on 12<sup>th</sup> December 2024. Canterbury delivered 1,718 new homes against a "requirement" over the same period of 2,557 dwellings. This results in a HDT measurement of 67% and an under-delivery of 839 new homes.

The Council's latest Authority Monitoring Report (2023/24) confirms that, at the time of publication, the 5 Year Housing Land Supply ('5YHLS') was 4.37 years. This was based on a calculated housing Local Housing Need (LHN) of 1,141 dpa which has risen to 1,216 dpa following the publication of the new Standard Method in December 2024. As a result, Canterbury's 5YHLS has now worsened to 4.1 years.

The lack of a plan-led approach will only continue to worsen Canterbury's HDT and 5YHLS positions. The effect of this will either be unplanned growth, or a failure to deliver of homes, resulting in worsening housing affordability, and more people living in overcrowded/substandard accommodation or living with parents far

longer than previous generations due to the lack of available and reasonably priced housing. It is therefore imperative that the Council continue to progress with bringing forward this Local Plan and ensuring it's soundness, enabling it to be adopted in accordance with the Local Development Scheme timetable.

In this context, we support the Council in its continued work to bring forward an up-to-date Local Plan. A new Local Plan is required to ensure the future needs of residents and businesses in the District can be met through the sustainable development of sites.

Furthermore, we are mindful that in previous plans the Council has relied heavily on the release of greenfield and Green Belt land. That cannot continue to be a credible solution when sustainable brownfield vacant sites are available. It put the emerging Plan in jeopardy if the Council's approach to site-selection is not in accordance with the Government's "brownfield first" agenda.

### Chartham Paper Mill

The Site extends to 11.4 hectares ('ha') and is located in the centre of the village of Chartham. It was previously used as a paper mill, with these operations formally closing in September 2022. Notably, the Site also accommodated residential development including workers cottages and a large house. The Site has not been in any use since but almost all of the large-scale buildings and structures which supported the Site's previous industrial use remain in situ.

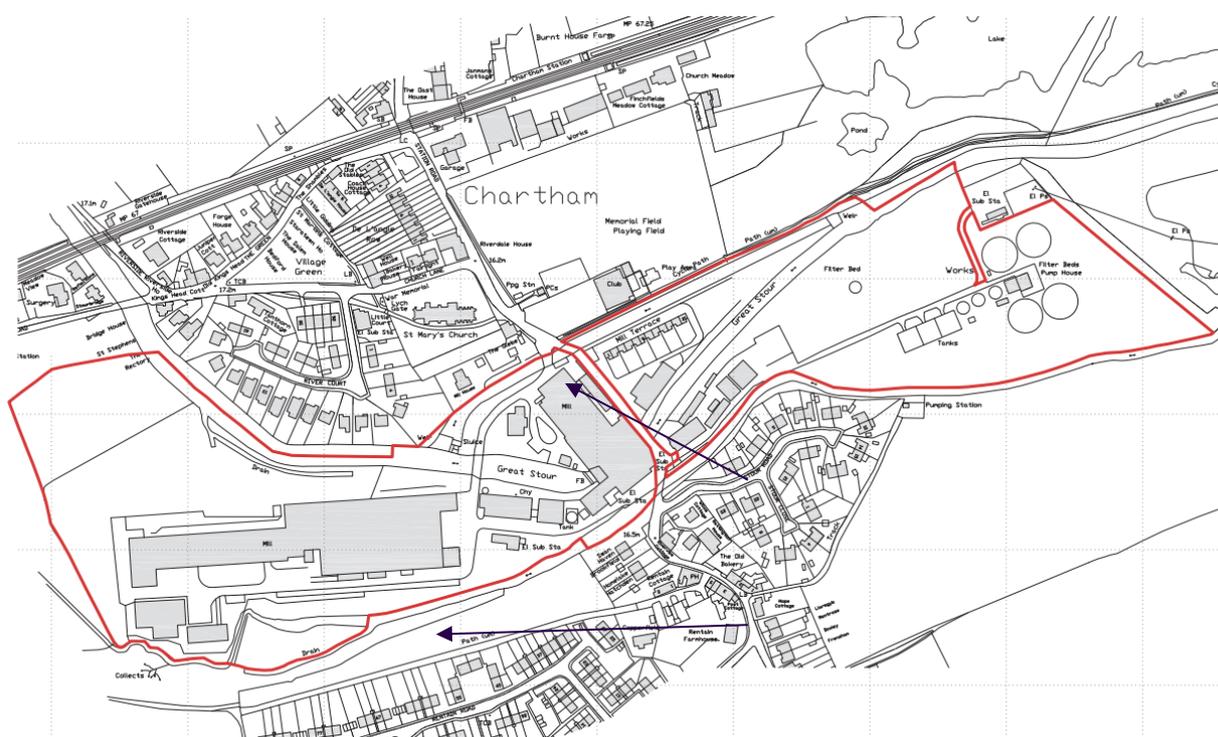


Figure 1 - Site Location Plan

The Site is located in proximity to a number of amenities in Chartham Village, including the railway station, community hall and playing fields, and the village green. The Site already benefits from infrastructure, including surface and foul drainage and electrical cables. The site is within the village settlement boundary as denoted in the Neighbourhood Plan. In terms of constraints, the Site is identified as being within Flood Zones 2 and 3. There are a number of listed buildings located within, and in proximity to the Site, as well with the Site also being located within the vicinity of Chartham Conservation Area.

The Site's existing employment use is no longer viable. The industrial buildings on the Site are bespoke designed and built for use as a paper mill. There are major structural faults in several buildings. Furthermore, the close proximity to established residential uses and narrow highways are not particularly suited to significant volumes of HGVs.

## The Council's approach to the Site

The Site is allocated within the Local Plan under draft Policy N31 (Chartham Paper Mill). The draft Policy states that the development mix for the Site should include approximately 165 new dwellings, in addition to new local shopping and community facilities, and open space. The draft Policy also sets out requirements in relation to design and layout, landscape and green infrastructure, and access and transportation.

The Council's decision to include the Site as a draft allocation within the Local Plan follows an assessment of the Site undertaken through the Council's Strategy Land Availability Assessment (SLAA) (2025). The Site was assessed under reference SLAA355, where it was considered that the Site was technically unsuitable for the development proposed by virtue of part of it being located within Flood Zone 3. However, it was considered that the flooding constraints could be mitigated with appropriate design in line with the Exception Test, and given this, and the lack of any other technical constraints, the Site should be allocated for development.

W&S Mills Ltd are strongly supportive of the Council's decision to include the Site as a draft allocation within the Local Plan. Development of the Site will utilise a vacant brownfield site in a highly sustainable location and meet the expectations of the Government which has committed to a 'brownfield first' approach to meeting housing need. There are no concerns that the Site could not be redeveloped with appropriate mitigation, and that the Site can be regarded as available and deliverable within the next 5 years to provide much-needed new homes for Canterbury.

## **Regulation 18 Local Plan responses**

Below, we set out responses to selected questions within the Regulation 18 document.

### Question 1: Local Plan period and housing needs

*1. Do you have any comments on the proposed housing need and plan period for the new Local Plan? Please explain your answer.*

Paragraph 1.9 of the Local Plan states that the district's LHN is 1,215 homes per year, which is one fewer than the 1,216 dpa required by the Standard Method. It would also be advised that the housing requirement set through the Plan is based on the Standard Method plus a buffer of 5-10% on this to account for any under-delivery on committed sites through the plan period. As such, based on a 19-year plan period, a total housing requirement of between approximately 24,000 and 26,000 homes would ensure the soundness of the Plan and enable the Council to maintain an appropriate level of housing delivery throughout the plan period.

### Question 2: Affordable housing and social rent

*2. Do you have any comments about how the new Local Plan should plan for social rent housing in the district? Please explain your answer.*

The Council's own evidence suggests a clear need for affordable housing in the district, including social rent homes. The Local Plan must plan for this through policies which set clear requirements for the delivery of specific housing products, whilst being worded with sufficient flexibility. If policy requirements are too onerous, they may render some sites undeliverable due to unviability, resulting in no housing on these sites being delivered at all, undermining the strategic aims of the Plan itself.

Policy N31: Chartham Paper Mill

*38. Do you have any comments on this policy? Please provide any evidence you have to support your comments.*

The decision to include the Site as an allocation for 165 new homes is strongly supported as it will utilise a vacant brownfield site in a highly sustainable location and meet the expectations of the Government which has committed to a 'brownfield first' approach to meeting housing need. It is therefore imperative Policy N31 is carried forward through to the Regulation 19 version of the Plan.

Whilst the Site is considered viable, it is expected that there will be significant costs associated the demolition and clearance of the Site's existing industrial large-scale buildings and structures to enable it to be redeveloped. Policy N31 should therefore be worded with sufficient flexibility, to ensure that it does not render the delivery of the Site unviable.

To ensure that Policy N31 is worded with sufficient flexibility and to ensure that it provides an appropriate degree of clarity on specific matters, the following alterations to part 1 of the policy wording are suggested:

- Part a) - adding the following wording: *"in line with Policies DS1 and DS2 subject to viability, with an appropriate provision of affordable housing and mix of housing to be agreed through discussions with the Local Planning Authority should adherence to Policies DS1 and DS2 result in the Site's development evidently becoming unviable."*
- Part b) - confirming the required provision of floorspace of new local shopping and community facilities, the current estimated capacity of which is 300sqm.
- Part c) - setting bespoke open space requirements as opposed to referring to Policy DS24. Given the physically constrained nature of the Site, delivery an on-site provision of open space which accords with the standards required through Policy DS24 may prove onerous. It is also noted that the Site benefits from being in very close proximity to Chartham Memorial Ground, which is located within 2-minutes walking distance of the Site.

Moving onto part 4 of Policy N31, initial assessments indicate that the level of impact on the local highway network would not warrant any upgrades to the A28 / Station Road junction, although this will be subject to detailed trip generation assessments and ultimately determined through engagement with officers in due course. As such, it is suggested to make the following alterations to part 4d) of the policy wording: *"Provide upgrades to the A28 junction with Station Road ~~as~~ if necessary."*

### **Summary and Conclusion**

We are mindful that in previous plans the Council has relied heavily on the release of greenfield and Green Belt land. That cannot continue to be a credible solution when sustainable brownfield vacant sites are available. It put the emerging Plan in jeopardy if the Council's approach to housing site-selection is not in accordance with the Government's "brownfield first" policy agenda as expressed in the National Planning Policy Framework.

The Site is located in close proximity to a number of amenities in Chartham Village, including the railway station, community hall and playing fields, and the village green. The Site already benefits from service infrastructure, including surface and foul drainage and electrical cables. The site is also within the village settlement boundary as denoted in the Neighbourhood Plan.

We acknowledge that the Site is located adjacent to the river and is shown on the Environment Agency maps as being subject to flood risk. However, the Site has not flooded in nearly a century, and our flood risk advisors are absolutely confident that the Site can be developed without causing undue risk to future occupants.

The principle of bringing forward a Local Plan is supported as the importance of creating an up-to-date Planned approach to planning for development cannot be understated. The Council's decision to include the Site as a draft housing allocation within the Local Plan is strongly supported. Development of the Site will utilise a vacant brownfield site in a highly sustainable location and will meet the expectations of the Government which has committed to a 'brownfield first' approach to meeting housing need.

We trust the above is clear, but should you have questions, please do not hesitate to contact me or my colleague Philip Scott [REDACTED]. In the meantime, we look forward to receiving confirmation of receipt and would appreciate being informed of further progress as the Local Plan moves towards adoption.

Yours faithfully

[REDACTED]

**Ralph Elliott**  
Senior Planner  
For and on behalf of Carter Jonas LLP

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