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Canterbury Society Response to the Regulation 18 Local Plan Consultation (Focused)

Dear colleagues,

The Canterbury Society welcomes the opportunity to comment on the Regulation 18 (Focused) consultation for Canterbury's Draft Local Plan. We recognise and appreciate that the Council has listened carefully to feedback received at earlier stages, as evidenced in the removal of allocation C12, demonstrating that the Council is in "listen mode" and willing to adjust proposals in response to community concerns, a positive foundation for the next stage of the Plan.

We also welcome the progress made in strengthening certain aspects of the evidence base, including the updated Local Housing Needs Assessment Addendum (2024), the refreshed Sustainability Appraisal, and the Habitats Regulations Assessment Addendum. The incorporation of a stronger "town centre first" policy direction, the embedding of biodiversity net gain, and reference to the emerging Local Nature Recovery Strategy are all steps in the right direction and align with national policy priorities.

However, despite these improvements, the Society remains concerned that the draft Plan continues to rely too heavily on assumptions of deliverability, deferred infrastructure provision, and mitigation measures that are not yet secured. Without a clearer evidential basis and stronger safeguards, there is a risk that the optimism of this draft will, as in 2017, not be borne out in practice, keeping pace with housing growth.

During examination of the current Local Plan in 2017, the Inspector concluded:

**“
the infrastructure necessary to support the development**

proposed in the Plan has been identified in the IDP..... there is

no evidence before me that it will not be delivered... ”

yet many of those road, drainage, school and health projects remain incomplete, while housing has proceeded. **This new draft Plan provides a vital opportunity to avoid repeating that pattern.**

The current draft represents a vital opportunity to remedy those weaknesses. In particular:

- The Plan lacks **clear, quantified infrastructure “tipping points”** or service-capacity **thresholds** to guide the **scale** and **timing** of development. This risks repeating the pattern of **growth outpacing infrastructure**.
- The Sustainability Appraisal does not adequately **test reasonable alternatives**, especially for environmentally constrained or contested sites - including Thanington Recreation Ground (N3).
- While we recognise that the NPPF (2024) now makes the Standard Method figure mandatory save for exceptional circumstances, we note that **other authorities** such as Basingstoke & Deane, Cotswold, Isle of Wight and Three Rivers **have at least tested the case for a reduction. Canterbury has not**. Given the district’s unique environmental constraints (including **two Areas of Outstanding Natural Beauty, three UNESCO World Heritage Sites, extensive areas of high landscape value – as defined in the Council’s Landscape Character Assessment, flood zones, and long-standing infrastructure deficits**) the absence of equivalent testing leaves the Plan exposed.
- Major **mitigation pathways** for **nutrient neutrality** and **wastewater** infrastructure remain **unresolved**. The Plan **assumes** delivery will occur, but offers **no confirmed funding, sequencing, or implementation strategy**.
- The draft policies **fall short of national expectations** on brownfield-first development, design quality, and green infrastructure integration. The revised NPPF (2024) now provides clearer direction on these matters, and the Plan should reflect that.

Our full submission is structured around the consultation questions and supported by local evidence, including direct feedback from residents.

This response draws not only on the Canterbury Society’s member survey but also on Canterbury City Council’s own Residents’ Survey (2022), which received nearly 1,900 responses and is statistically representative at District level. The alignment of both datasets reinforces the salience of issues such as housing affordability, infrastructure capacity and town centre vitality. Where appropriate, we have grouped related policies to reflect cross-cutting concerns around infrastructure readiness, environmental constraints, and implementation risk.

We urge the Council to use the Regulation 19 stage to strengthen the Plan’s evidential base, improve transparency, and adopt a more constraint-aware, infrastructure-led approach. This is a timely opportunity to restore public confidence in the planning process and ensure that future growth is sustainable, deliverable, and aligned with Canterbury’s distinctive landscape and heritage. We remain available to assist the Council in refining the Plan and welcome continued collaboration on this critical stage of the District’s future.

Yours sincerely,



Deputy Chair - Local Plan Consultation Lead

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[Appendix A: Key Themes from the Canterbury Society Membership Survey](#)
[Appendix B: Responses to Consultation Questions](#)

Appendix A: Key Themes from the Canterbury Society Membership Survey



Between 8 July and 24 September 2025, the Canterbury Society invited members to share their views on the Regulation 18 (Focused Consultation) draft Local Plan via a structured online survey.

- Survey sent to: 740 members
- Open rate: 60.2% (1,291 total opens)
- Total responses received: 65

The survey included a mix of multiple-choice and open-text questions, allowing members to express their views on proposed site allocations, infrastructure, heritage, environmental priorities, and policy direction.

Despite the modest sample size, the responses were thoughtful, detailed, and broadly representative of the Society's longstanding civic and heritage concerns. These findings have directly informed our policy-by-policy submission.

1. Housing Concerns

- 46% flagged housing location, affordability, or type as a key issue.
- Overwhelming opposition to large, car-dependent greenfield estates.
- Support for:
 - Brownfield reuse (Nasons and Debenhams mentioned)
 - Smaller homes, flats, and genuinely affordable housing
 - Prioritisation of social housing and homes for local residents
- Clear rejection of luxury commuter housing and over-reliance on student HMOs.

2. Climate and Environmental Protection

- 46% raised climate/environment as a priority.
- Strong support for:
 - Net-zero and high-efficiency housing
 - Nutrient neutrality and pollution control
 - Protection of Blean, greenfield land, and existing wildlife corridors
- Specific critique of Biodiversity Net Gain as a “box-ticking exercise”.

3. Design, Identity and Character

- 37% selected design/character as a concern.
- Consistent worries that:
 - CCC permits low-quality and generic housing
 - Poor design risks turning Canterbury into “an ordinary elsewhere”
 - Heritage and vernacular building styles are under-protected

4. Infrastructure and Phasing

- Repeatedly cited as a failure:
 - Roads, buses, GPs, schools, sewerage, A&E capacity
- Strong calls for:
 - A robust Infrastructure Delivery Plan



- Phased housing contingent on infrastructure delivery
- “Infrastructure first” approach enforced via planning conditions

5. Transport and Traffic

- 59% selected transport/traffic as a concern.
- Strong concerns about:
 - Congestion (e.g. Old Dover Road, Wincheap)
 - Inadequate bus services
 - Lack of sustainable transport options
- Suggestions included:
 - Congestion charging
 - ULEZ-style zones
 - Free Park & Ride and better cycle/pedestrian infrastructure

6. Strategic Direction

- Many commented on:
 - The lack of a coherent vision or “overarching plan”
 - Piecemeal growth dictated by developers
 - Canterbury’s historic and spiritual role being undermined
 - Failure to prepare for Local Government Reorganisation (LGR)

Appendix B: Response to Consultation Questions



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Q1: Local Plan period and housing needs

Summary Response

The Canterbury Society supports the extension of the Local Plan period to 2045, consistent with national policy guidance. However, we urge the Council to do more than simply apply the Standard Method. The Plan should shape how housing need is delivered through clearer infrastructure phasing, better alignment with affordable housing needs, and a compact, brownfield-first spatial strategy that reflects the district's physical and policy constraints.

We also encourage the Council to anticipate future governance changes by embedding design codes, infrastructure triggers, and a Local Plan review clause, ensuring continuity and soundness under any potential Local Government Reorganisation (LGR). While Canterbury has published four Statements of Common Ground, these could be strengthened through clearer documentation of meeting outcomes and unresolved matters, as practiced by authorities, such as West Suffolk. Canterbury should publish a log of cross-boundary meetings and outcomes before Regulation 19.

Key Issues / Justification

1. The housing need figure is fixed - but delivery must still be plan-led and justified

The Council has updated its housing need figure to 1,215 dwellings per annum in line with the Standard Method. This is mandatory under the 2024 NPPF unless “exceptional circumstances” apply, which the Council has explicitly stated do not exist in Canterbury's case. The Society does not challenge this calculation as the starting point.

However, meeting the figure is not the same as proving it is deliverable. The Plan must still demonstrate that housing growth on this scale can be supported by the capacity of local infrastructure, services, and the environment. At present, the draft Plan does not quantify these limits. We therefore request that, before Regulation 19, the Council publish an Infrastructure Capacity Statement setting out the maximum additional dwellings which existing or planned services can accommodate, including primary care, schools, wastewater and potable water, emergency services, and transport.

Without such evidence, the Council cannot show that the Standard Method requirement is deliverable without serious harm. If that evidence were to show that services cannot scale in line with the planned growth, the logical policy options would be either a reduced trajectory (justified by constraints) or clear phasing and triggers that limit occupation until upgrades are in place.

Taking this approach would not be a rejection of the Standard Method, but a responsible interpretation of it in light of Canterbury's exceptional constraints. Other authorities with similar pressures have already commissioned evidence to test whether their capacity justifies deviation. Basingstoke & Deane, facing wastewater limits and AONB settings, has formally explored whether these justify a lower trajectory. Cotswold District has pointed to its extensive AONB and transport limits as



grounds for a reduced figure. The Isle of Wight has argued that its constrained geography and service deficits cap deliverability, and Three Rivers has tested a Green Belt-led scenario that recognises protected designations as practical limits on growth.

In none of these cases has an Inspector yet approved a deviation, but the point is clear: those councils have at least published evidence and legal advice to show they tested the question transparently. Canterbury has not done so, despite facing constraints of equal or greater weight. At a minimum, the Inspector will expect CCC to demonstrate that it has undertaken a comparable level of evidence testing. Even if the final figure remains 1,215 homes per year, the credibility of the Plan depends on showing that this number has been stress-tested against real-world capacity.

2. The Local Housing Needs Assessment (LHNA) remains weak on affordability and local mix

The Council has published an updated LHNA Addendum (2024), incorporating 2021 Census data. However, the Society remains concerned that the Plan over-prioritises market-led 3-5 bedroom homes and underrepresents the acute need for social rent, 1–2 bed homes, and accessible dwellings.

The housing register confirms significant unmet demand, with over 2,800 households awaiting social housing and low recent delivery of true social rent. While the Addendum disaggregates bedroom mix by tenure type, it does not yet translate into a specific policy target for social rent. This risks the 30% “affordable” target being delivered largely through shared ownership or other intermediate products, which do not meet the affordability needs of those on the housing register.

The NPPF support a specific tenure breakdown where justified by local evidence and Canterbury’s evidence justifies this.

3. Poor alignment with brownfield-first national policy

NPPF 2024 (para 125c) places “substantial weight” on the use of suitable brownfield land within settlements and para 90 confirms a strengthened “town centre first” principle for retail, office, and leisure uses. While the draft Plan acknowledges these priorities, in practice its trajectory brings forward major peripheral greenfield sites from Year 1 (including Broad Oak and the Blean fringe), while regeneration opportunities such as Nasons, Wincheap, and Chartham Paper Mill are deferred. It’s positive to see the Council has introduced Policy SP10 to reaffirm a town centre-first approach, but without stronger mechanisms to integrate SP10 into the housing and spatial strategy, the policy risks being aspirational rather than transformative. A credible brownfield-first and town centre-first strategy would prioritise compact growth in sustainable urban locations, tie delivery to infrastructure readiness, and strengthen the resilience of Canterbury, Herne Bay, and Whitstable town centres.

4. Cross-Boundary Cooperation and Duty to Cooperate

Canterbury City Council has published four Statements of Common Ground (SoCGs) with Dover, Folkestone & Hythe, Swale, and Ashford. This demonstrates active engagement through the East Kent Strategic Planning Group, but these SoCGs



remain limited in scope. They confirm bilateral dialogue and agreement that each authority will meet its own needs, yet do not quantify or resolve shared strategic matters such as A2 corridor congestion, water and wastewater capacity, or nutrient-neutrality governance at Stodmarsh.

Under paragraphs 31 and 35 of the NPPF and section 33A of the Planning and Compulsory Purchase Act 2004, the Duty to Cooperate requires constructive, active and ongoing engagement that leads to measurable outcomes, not simply the exchange of statements. Inspectors increasingly expect SoCGs to demonstrate:

- tangible joint evidence or modelling where cross-boundary impacts arise (e.g. transport, utilities, landscape);
- clear action schedules identifying next steps and responsible authorities; and
- inclusion of county and infrastructure bodies (for example: KCC, Natural England, NHS Kent & Medway) as signatories where relevant.

5. Governance risks from impending Local Government Reorganisation (LGR)

While no reorganisation is yet confirmed, the Council must acknowledge the potential for an East Kent or Kent-wide unitary authority within the Plan period. This is not speculative, it reflects financial stress at KCC and precedents elsewhere - notably:

- Buckinghamshire (2020): The Chiltern & South Bucks Plan was withdrawn mid-Examination due to the shift to a unitary structure.
- Somerset (2023): The new unitary has delayed plan adoption until 2029, citing resource constraints and policy bandwidth.
- Northamptonshire (2021): Local plan work restarted post-unitarisation, with fresh evidence and Duty to Cooperate requirements.

In parallel Government pressure to shorten Local Plan Examinations has grown:

- The [Planning Inspectorate's Procedure Guide](#) for Local Plan Examinations warns that pauses should "normally be no longer than six months" and that plans should not be submitted without a complete and stable evidence base.
- In [a ministerial letter dated 30 July 2024](#), the DLUHC Housing Minister warned that the average Local Plan Examination has doubled in length (from 65 to 134 weeks), and signalled a tougher approach to managing pauses, extensions, and under-evidenced submissions.

Canterbury's current trajectory risks adopting a Plan just as the governance landscape shifts, raising questions of waste, duplication, and procedural soundness. The Society is not advocating delay. Instead, we urge CCC to safeguard the Plan by embedding infrastructure triggers, design codes, spatial phasing, and viability thresholds now (the elements most likely to survive transition). A review clause within the Local Development Scheme could also provide a rapid alignment mechanism if governance changes.

Supporting Evidence and Sources

- [NPPF \(2024\)](#)
- [Canterbury SA Appendix F \(Aug 2025\)](#): Notes infrastructure and heritage constraints as key risks to spatial strategy alternatives



- [Member survey \(Sept 2025\)](#): Over 70% of respondents prioritised protecting the natural environment, transport impacts, and the design/character of new housing
- [Reg 18 Local Plan](#): Housing trajectory prioritises greenfield sites from Year 1
- Case studies: [Buckinghamshire](#) (withdrawal of Chiltern & South Bucks Local Plan 2020); [Somerset](#) (delayed adoption to 2029); Northamptonshire (plans abandoned/restarted)

Recommended Changes

- Q1-R1** Maintain the 1,215 dwellings per annum figure for compliance with the Standard Method, but require the Council to publish an Infrastructure Capacity Statement before Regulation 19. This should quantify the maximum additional dwellings that can be supported by existing or planned capacity in schools, primary care, wastewater and potable water, emergency services, and transport.
- Q1-R2** Require the Council to stress-test the Standard Method figure against local constraints, as peer authorities have done. Even if the figure is not reduced, the process of transparent evidence testing is essential to demonstrate soundness.
- Q1-R3** Introduce a Local Plan policy setting a specific minimum requirement for social rent within the affordable housing target (at least on large sites or public land), grounded in the Council's housing register and affordability data.
- Q1-R4** Resequence the housing trajectory to front-load sustainable brownfield sites, rather than bringing forward greenfield land in the early years.
- Q1-R5** Embed infrastructure-linked phasing and trigger points, particularly for strategic sites, so that occupation is conditional on timely provision of essential services.
- Q1-R6** Strengthen cross-boundary cooperation evidence by publishing an updated Duty to Cooperate Statement and an East Kent Joint Infrastructure Statement quantifying shared transport, water and environmental impacts. The four existing Statements of Common Ground (with Dover, Folkestone & Hythe, Swale and Ashford) should be expanded to include Kent County Council, Natural England and other infrastructure providers as signatories, and updated annually with a clear record of unresolved strategic matters and agreed actions.
- Q1-R7** Include a Local Plan review mechanism in the Local Development Scheme to allow rapid alignment if governance changes occur under Local Government Reorganisation (LGR).



Q2: Affordable Housing and Social Rent

Summary Response

The Canterbury Society welcomes the Local Plan's 30% affordable housing target but remains deeply concerned that, as drafted, policy lacks the safeguards needed to secure homes that are genuinely affordable to those in greatest need. "Affordable housing" is being treated as a single bucket, with insufficient attention to tenure mix - particularly Social Rent. Without a clear minimum for Social Rent and stronger delivery mechanisms, the Plan will continue to meet affordability targets in name while failing households on the waiting list and keyworkers priced out of the district.

We urge a shift from sheer numbers to the right mix, in the right places, with Social Rent as the default on public and major greenfield land - backed by enforceable phasing, monitoring, and viability tools already supported by the Council's own evidence.

Key Issues / Justification

1. Clarifying what "affordable" really means

Not all "affordable" tenures meet real household budgets. Social Rent is the only tenure consistently affordable to the lowest income quartiles. By contrast, "affordable rent" and some intermediate products can exceed local affordability thresholds: a typical two-bed "affordable rent" at ~£900/month consumes over 40% of net income for a household on the district's median salary - self-evidently unaffordable for many families.

The Local Plan should therefore prioritise Social Rent, with an explicit minimum share within the affordable requirement, and tie any downward variation to transparent, site-specific viability evidence.

2. Grounding tenure mix in real, local need

The LHNA (2021) and 2024 addendum provide useful district-wide baselines, but persistent signals from the housing register (c.2,800 households; high demand for 1-2 bed homes) show the need profile is sharper than the Plan currently recognises. Completions in recent years have been dominated by intermediate products, while Social Rent delivery has been minimal.

The policy response should be explicit: small-unit and Social Rent-led mix, with spatial targeting where need is most acute.

3. Using land value uplift to deliver Social Rent

Planning permission transforms land value. On publicly owned sites and major greenfield allocations, that uplift should be leveraged to deliver a majority Social Rent affordable package. Where grant is available, Social Rent proportions should be ratcheted up, not traded down. This is consistent with national policy and best-value duties on public assets.

4. Viability evidence supports going further than 30%

The Council's 2023 Viability Annex sensitivity tests show that moving from 30% to



35–40% affordable housing reduces residual land value but does not render development inherently unviable, particularly on greenfield sites where uplift is greatest. The same analysis acknowledges scope to include Social Rent within the mix.

The Council's own evidence provides room to raise the baseline (with differential rates) and to hard-wire Social Rent as the anchor tenure - subject to transparent, site-specific viability review rather than blanket exemptions.

5. Strengthening delivery mechanisms and monitoring

Targets without teeth will slip. Section 106 should fix tenure split, dwelling sizes, and phase delivery so affordable homes are built in step with market units, not back-loaded. A live Affordable Housing Pipeline (reporting by site, tenure and phase) will allow Members and communities to track whether commitments are being kept.

Supporting Evidence and Sources

- [NPPF \(2024\)](#)
- [Local Housing Needs Assessment](#) (Canterbury City Council, 2021 - last full LHNA)
- Partial [Local Housing Needs Assessment](#) (Canterbury City Council, 2024 - focussed update)
- [Sustainability Appraisal Appendix I](#): flags tenure imbalance and risk of undersupply
- Canterbury City Council Residents' Survey (2022): "Affordable decent housing" ranked 5th most important and 3rd most in need of improvement
- [Local Plan Viability Study Annex \(2023\)](#): sensitivity testing shows scope for 35–40% affordable and inclusion of Social Rent.
- [Canterbury Society Member Survey \(2025\)](#): strong support for social rent and tenure reform
- [2020–2024 Housing Delivery Reports](#): show very low social rent completions across the district

Recommended Changes

- Q2-R1** Set a district-wide minimum of 35% affordable housing, rising to 40% on major greenfield and all public-sector land (subject to site-specific viability).
- Q2-R2** Within the affordable component a clear policy expectation that at least 60% of affordable housing should be delivered as social rent, unless site-specific viability evidence justifies a lower proportion.
- Q2-R3** Prioritise public and greenfield land for social-rent-led development, treating social rent as the default tenure in such locations.
- Q2-R4** Update the LHNA to include spatial disaggregation by settlement and housing market area, enabling more responsive and equitable policy.
- Q2-R5** Introduce a live Affordable Housing Delivery Monitor reporting quarterly on completions by site, tenure, and phase - including a breakdown of social rent delivery.
- Q2-R6** Embed enforceable S106 mechanisms to ensure that affordable housing delivery is in step with market housing and not deferred or diluted.



Q3: Economic Development and the Modern Economy

Summary Response

The Canterbury Society supports a more ambitious, place-based approach to economic development - one that reflects both employment land allocations and the health of high streets, access to local jobs, and the infrastructure that enables people to live and work well in the district.

While the Regulation 18 Local Plan identifies some strategic employment allocations, it falls short of presenting a cohesive spatial or policy vision for the modern economy. It does not adequately address the needs of small businesses, freelancers, the cultural and care sectors, or the fragility of town centres. Nor does it demonstrate how growth in housing will be balanced by commensurate growth in skills, employment, and local enterprise.

The Council's 2022 Residents' Survey, though not directly focused on employment, provides a clear indication of community priorities. Over 100 open-text responses referred to the state of the high street, access to jobs, and economic hardship. This confirms a strong public appetite for a Local Plan that supports a vibrant, inclusive, and adaptable local economy.

Key Issues / Justification

1. Move beyond “homes-led” growth and rebalance towards local jobs and skills

The draft Plan remains disproportionately focused on housing delivery, treating economic development as a secondary outcome rather than a strategic objective in its own right. This imbalance risks driving further out-commuting, weakening local resilience, and missing opportunities to build a self-sustaining economy. ONS labour market data shows Canterbury's economy is characterised by lower-than-average wages and significant net outflows of workers to other parts of Kent and London. A more balanced approach must actively safeguard employment land, promote flexible workspace, and strengthen skills infrastructure in both urban and rural parts of the district. Without this, growth risks deepening inequality and detaching residents from the benefits of local development.

2. Support creative, cultural and care sectors as resilient growth engines

Sectors such as culture, heritage, and care generate high social value and offer sustainable local employment. They align naturally with Canterbury's historic and civic identity yet remain underrepresented in the Plan's economic framework. Unlike mobile or automated industries, these place-rooted sectors are resilient to external shocks and can anchor long-term recovery. The Plan should explicitly support cultural infrastructure, sector clustering, and training pathways tied to these industries, broadening its focus beyond traditional B-class employment to embrace community enterprise and social innovation.

3. Plan for a modern economy: smart, low-carbon, and locally embedded

The nature of work is changing, and the Local Plan must respond to that change. Remote and hybrid working models are now embedded across many sectors,



especially among knowledge workers, freelancers, and those in the care and creative fields. Supporting home-working, small co-working hubs, and digital infrastructure (particularly full-fibre broadband) is no longer optional, but essential. At the same time, the reuse of redundant commercial floorspace must be prioritised over greenfield expansion, and the transition to a net zero economy reflected in employment land design and retrofitting policy.

4. Addressing town centre fragility through an integrated recovery strategy

Canterbury, Herne Bay, and Whitstable all face structural challenges from retail decline, reduced footfall, and a rise in vacant units. The Residents' Survey recorded over 100 free-text concerns about shops, business closures, and city centre deterioration. Canterbury BID data confirms marginal footfall decline even after the pandemic recovery, with trading conditions worsened by access issues, roadworks, and car park closures.

While the draft Plan reasserts a “town centre first” policy framework through Policy SP10 and changes to use class flexibility (consistent with NPPF paragraphs 90-95) it lacks an integrated strategy for regeneration and recovery. The principle is sound, but it risks being aspirational without mechanisms to prioritise brownfield regeneration, convert vacant floorspace, and phase mixed-use redevelopment early in the Plan period. To be credible, the Local Plan must connect SP10 to a district-wide Town Centre Recovery Strategy that aligns land use, transport, design, and economic development interventions.

Supporting Evidence and Sources

- [NPPF \(2024\)](#)
- [SA Appendix I & G](#): Acknowledge employment land and town centre risks from housing dominance
- [Canterbury Society member survey \(2025\)](#): Strong support for small-scale enterprise, community businesses, and preserving town centre vibrancy
- [Reg 18 Economic Development and Tourism Study \(March 2025\)](#): Highlights long-term sectoral shifts and commercial space oversupply risk
- Canterbury City Council Residents' Survey (2022): Over 100 open-text responses on economic issues and repeated concern about declining town centres and small business pressures.

Recommended Changes

Q3-R1 Introduce a District-wide Employment and Skills Policy aligned with Local Industrial Strategy and community resilience goals.

Q3-R2 Allocate flexible small-site employment land in rural and suburban locations.

Q3-R3 Publish a Cultural and Care Sector Needs Assessment to support spatial planning.

Q3-R4 Embed a Town Centre Recovery Strategy that integrates economic, social and design objectives for Canterbury and other district centres.



Q4: Water Infrastructure and Delivery

Summary Response

The Canterbury Society supports a clear and enforceable policy commitment to infrastructure-led development. In particular, the principle of “no infrastructure, no occupation” must be given real weight in the Local Plan - not just as a planning aspiration, but as a structured phasing mechanism.

Water and wastewater infrastructure, including treatment works and sewer capacity, are critical constraints in several parts of the district. If development is allowed to proceed ahead of infrastructure delivery, it risks environmental degradation, legal challenge, and the failure of basic public services. The Local Plan must adopt a proactive framework based on capacity thresholds (or “tipping points”) to ensure that housing delivery does not outpace the systems required to support it.

We refer to our comments under Q1 regarding the need for a capacity-based infrastructure assessment before finalising the housing requirement. We believe the current scale and phasing of housing growth must be evidence-led, capacity-tested, and constrained by Canterbury’s environmental and infrastructure limits, as required under NPPF 2024.

Key Issues / Justification

1. Infrastructure Capacity Must Govern Development Phasing

Water infrastructure across the district is already under pressure, and several allocations lie within catchments where wastewater treatment capacity is constrained or overloaded. The principle that development must only proceed where infrastructure is available is well-established, including through the lawful use of Grampian conditions. However, what is currently missing from the draft Local Plan is a spatially specific, enforceable policy framework that defines the capacity thresholds for key infrastructure and sets out how development will be phased accordingly. In other authorities such thresholds are built into policy wording (often expressed through statements such as “no more than X units to be occupied until capacity is confirmed at Y WwTW.”). Without this kind of embedded control, Canterbury’s Local Plan risks frontloading growth in locations where infrastructure may take many years (or multiple funding cycles) to deliver.

2. Reliance on Project-Level Conditions is Not Sufficient

While the use of Grampian-style conditions at the decision-making stage is necessary, it is not enough. Such conditions can only be used where the infrastructure in question is capable of delivery and where a realistic delivery route has been identified. They cannot be used to defer responsibility indefinitely or to offset strategic gaps in the Local Plan itself. The draft Plan currently contains vague language around mitigation and infrastructure delivery, but lacks site-specific timing triggers or delivery schedules. This creates significant risk for both the Council and communities: developers may gain outline permission in the absence of available capacity, and there will be no formal mechanism for withholding occupation if delivery later proves impossible or delayed.



3. Clarity Is Needed on Who Pays, and What Happens if They Don't

Where capacity upgrades are needed to enable development, the costs must fall somewhere - either on the developer, on the public purse, or on bill payers via utility pricing. Without clear phasing triggers and delivery schedules, there is a strong risk that the burden shifts away from the developer and onto households or the environment. At worst, the Plan could allow speculative housing growth that permanently outpaces system capacity, requiring either emergency infrastructure works or acceptance of degraded service levels (e.g. more frequent sewer surcharging, storm overflow use, or reduced water quality).

This is not an acceptable outcome, and the Local Plan should make clear that the default expectation is that developers must fund and phase their growth in line with infrastructure capacity - not the other way round.

4. Current Wording in the Draft Plan is Too Generic

The draft Local Plan does not include any binding phasing policy for water infrastructure. No delivery schedule is included for upgrades to wastewater treatment capacity, no spatial prioritisation is offered, and no triggers are linked to Southern Water's investment cycles. There is also no clear mechanism for how phasing would be enforced if infrastructure funding were delayed or withdrawn. While the HRA and IDP acknowledge water and wastewater risks in general terms, they fall short of providing the policy linkage needed to ensure these risks are actually controlled through the Plan.

Supporting Evidence and Sources

- [Strategic Flood Risk Assessment \(2025\)](#): identifying wastewater and drainage constraints
- [HRA Addendum \(2025\)](#): citing water quality risks to designated sites
- [Southern Water investment programme \(AMP7\)](#)
- [West Suffolk Local Plan](#) (Red Lodge example of capacity-based phasing)
- [NPPF \(2024\)](#)

Recommended Changes

Q4-R1 Introduce site-specific phasing triggers tied to wastewater and water capacity

Q4-R2 Publish a Water Infrastructure Delivery Schedule as part of the Infrastructure Delivery Plan

Q4-R3 Include a cross-reference in strategic housing and infrastructure policies to infrastructure thresholds, with wording such as:

“Development at Site X will be phased such that no occupation occurs until the completion and commissioning of wastewater capacity improvements at Y facility, as confirmed by the statutory undertaker.”

Q4-R4 Clarify that where infrastructure cannot be delivered within the Plan period, the associated allocation may be deemed undeliverable and deferred or removed



Q5: Deletion of Land north of the University of Kent (Policy C12)

Summary Response

The Canterbury Society strongly supports the Council's decision to remove Policy C12 from the emerging Local Plan. The land north of the University of Kent was inappropriate for allocation, both in principle and in practical terms, due to its combination of environmental sensitivity, landscape importance, access limitations, infrastructure challenges, and proximity to the World Heritage Site setting. Its deletion represents a positive and evidence-based outcome that reflects wide-ranging stakeholder concerns. Moreover, the removal of this site should serve as a clear precedent for revisiting other greenfield allocations that suffer from similarly poor sustainability performance and unresolved constraints.

Key Issues / Justification

1. **Environmental and landscape sensitivity**

This site occupies a prominent and sensitive position at the north-western edge of Canterbury, where the transition from the built environment to the rural and ecological landscape is especially valuable. The land forms part of a wider green corridor that supports biodiversity, provides visual containment to the urban area, and links to the Crab and Winkle Way. The Sustainability Appraisal (Appendix G) confirmed that development here would result in the loss of priority habitats, fragmentation of ecological networks, and erosion of long-range views over the Stour Valley and North Downs. Protecting this site contributes meaningfully to biodiversity resilience and the long-term sustainability of the city's green edge.

2. **Access, topography and infrastructure constraints**

From a development viability perspective, the site suffers from acute physical and infrastructural challenges. Its steep gradient creates both cost and design complications, while vehicular access options are extremely limited without significant off-site interventions.

These constraints undermine walkability and make it highly likely that any housing here would be car-dependent, directly at odds with the National Planning Policy Framework's emphasis on sustainable transport and compact urban form.

These issues led to the site being assessed as undeliverable in the Council's Strategic Land Availability Assessment (SLAA) and raised serious concerns in the Local Plan transport modelling process.

3. **Heritage and setting impact**

The site lies within the wider setting of Canterbury Cathedral, a UNESCO World Heritage Site. Development in this location would have risked encroachment into Canterbury's historic silhouette and compromised key long views from elevated and publicly accessible areas. The area also plays an important role in maintaining the legibility of the historic transition from city to countryside. These factors placed the proposal in direct conflict with both the World Heritage Site Management Plan and NPPF paragraphs 200–221, which require great weight to be given to the conservation of heritage assets and their setting. The proposed allocation did not



meet that test.

4. Public opposition and democratic legitimacy

Throughout the consultation process, the site attracted sustained and coordinated public opposition. This included formal objections from civic organisations, residents' groups, environmental campaigners. The Council's decision to remove Policy C12 demonstrates responsiveness to this breadth of evidence and public concern, and represents an example of policy being revised in line with community values and sound planning judgement.

5. Precedent for reappraisal of other sites

The deletion of C12 shows that the Local Plan process can respond to environmental, access, and community-based red flags, and be willing to remove allocations where mitigation is not possible.

This same rigorous and transparent standard should now be applied to other constrained or speculative sites. Several existing allocations show the signs of similar contention in terms of transport capacity, open space loss, or misalignment with strategic policy, and should be reassessed in light of the potential precedent set by the removal of Policy C12.

Supporting Evidence and Sources

- [Sustainability Appraisal \(Appendix G\)](#): Identifies landscape, access and deliverability constraints for C12.
- [NPPF \(2024\)](#)
- [Strategic Land Availability Assessment \(SLAA\)](#): Flags infrastructure challenges and deliverability barriers.
- [WHS Management Plan](#) (2002) and NPPF heritage policies: Require avoidance of harm to setting.

Recommended Changes

Q5-R1 That C12 is formally removed from the policies map and trajectory at Regulation 19

Q5-R2 That the SA scoring matrix is applied consistently to review other constrained greenfield sites,

Q5-R3 That the north-west Canterbury green edge is formally protected via landscape or green infrastructure designation in the final Plan.



Q6: Deletion of Land north of Hollow Lane (Policy C7)

Summary Response

The Canterbury Society fully supports the proposed deletion of Land north of Hollow Lane (Policy C7) from the draft Local Plan. The site is clearly unsuitable for allocation due to its proximity to the Larkey Valley Wood Site of Special Scientific Interest (SSSI), poor accessibility, high landscape and heritage sensitivity, and weak deliverability. Its removal reflects the Council's own evidence, aligns with the principle of environmentally responsible plan-making and responds appropriately to public and expert concern.

Key Issues / Justification

1. **Ecological sensitivity**

The site lies immediately opposite Larkey Valley Wood SSSI, an area of ancient semi-natural woodland of national importance. The SSSI forms part of the wider ecological corridor running south-west of Canterbury, linking into the proposed Wincheap-to-Blean wildlife corridor identified in the Council's Green Infrastructure Strategy.

The Habitats Regulations Assessment (August 2025) identifies potential risks of recreational disturbance, habitat fragmentation, and hydrological and air-quality impacts. These "edge effects" could degrade protected habitats within the SSSI, triggering the "no reasonable scientific doubt" threshold under the Habitats Directive. Development here would therefore be legally and environmentally unsound without secured, deliverable mitigation - which the evidence base does not currently provide.

2. **Unsustainable access and infrastructure profile**

The site would be heavily car-dependent. It is disconnected from high-frequency public transport, safe walking routes, and cycle infrastructure, and lies beyond convenient reach of local services such as schools, shops, and health facilities. Road access via Hollow Lane and New House Lane is constrained and unsuitable for significant new traffic.

This level of isolation directly contradicts national and local policies requiring development in accessible, well-serviced locations (NPPF paragraphs 81-108). Any development would exacerbate congestion, undermine modal shift goals, and increase carbon emissions the opposite of sustainable spatial planning.

3. **Heritage setting and landscape impacts**

C7 occupies a highly visible approach to Canterbury's southern edge, forming part of the city's visual and ecological transition into open countryside. Development would erode this landscape buffer, damage long views from New House Lane and the Wincheap ridgeline, and intrude into the wider setting of the Canterbury World Heritage Site, potentially affecting the Cathedral's silhouette and skyline prominence. The Sustainability Appraisal (Appendix G) confirms negative effects on both landscape and heritage criteria, reinforcing community concerns that this site would cause disproportionate visual and experiential harm.



4. Unlikely to deliver housing within the Plan period

The Council's own Strategic Land Availability Assessment (SLAA) indicates that this site is unlikely to deliver housing within the first 10 years of the Plan period. A combination of costly infrastructure upgrades, unresolved site ownership issues, and reliance on significant off-site mitigation measures make the site unviable in the short to medium term.

Retaining C7 within the Local Plan would have therefore undermined one of the fundamental tests of soundness under the NPPF, that of deliverability. The Local Plan must prioritise sites that are genuinely deliverable, both financially and logistically, especially in its early trajectory.

Supporting Evidence and Sources

- [Habitats Regulations Assessment \(August 2025\)](#): likely adverse effects requiring complex mitigation.
- [Sustainability Appraisal \(Appendix G\)](#): negative scores on biodiversity, access, and landscape criteria.
- [Strategic Land Availability Assessment \(2025\)](#): identifies delivery risks and infrastructure gaps.
- [NPPF \(2024\)](#)

Recommended Changes

Q6-R1 A Green Infrastructure designation or Local Green Space protection should be applied to site C7 and surrounding land to reinforce its environmental and strategic importance.

Q6-R2 The Council should commit to using Sustainability Appraisal findings consistently to reassess other sites with similar negative impacts.

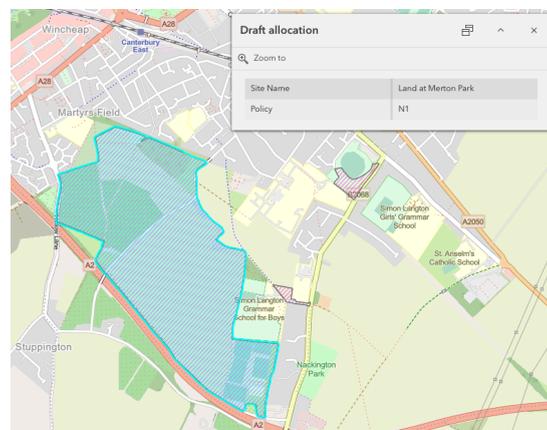


Q7: Policy N1 – Land at Merton Park

Summary Response

The Canterbury Society has significant reservations about the soundness, sustainability, and infrastructure readiness of Policy N1 in its current form. While we do not oppose development in principle, this allocation presents material risks that must be mitigated through a fundamental policy redraft.

Unless major changes are made to ensure a landscape-led, infrastructure-first, and environmentally responsible approach, N1 risks facilitating unsustainable sprawl, overloading already-stretched infrastructure, and degrading the visual and ecological setting of the city's southern edge.



Key Issues / Justification

1. Landscape sensitivity, ridgeline intrusion, and biodiversity

The site occupies a visually prominent ridgeline on the southern edge of Canterbury, clearly visible from the A2 and key approaches to the city. Development would breach the long-standing New House Lane boundary and push urban form into open countryside already affected by Thanington Park. The Sustainability Appraisal (Appendix G) identifies significant negative effects on local landscape character, visual amenity, and biodiversity corridors. These risks are not adequately mitigated by the current policy. If development is to proceed at all, it must exclude land above the 50-metre contour, retain meaningful green buffers, and secure biodiversity net gain on site, not through offsetting.

2. Infrastructure dependency - A2 junction and east-west connectivity

Policy N1 is not deliverable without major transport infrastructure - namely, a new grade-separated junction onto the A2 and improvements to east-west movement across the city's southern fringe. These were previously envisioned under the now-abandoned Canterbury Circulation Plan but are no longer supported by an approved, costed delivery strategy.

Without these upgrades, the development would intensify congestion at already overburdened junctions and fail to meet the Local Plan's sustainable transport objectives.

The Council must make any development at Merton Park conditional upon secured funding and planning permission for the junction, as well as active travel and bus links delivered in tandem with early phases.

3. Failure to integrate with existing settlements

The proposed allocation risks creating an isolated, car-dependent estate detached from the existing urban fabric. It is not well connected to surrounding neighbourhoods such as Thanington or Wincheap and lacks an embedded centre or clear social



infrastructure. Members raised consistent concerns that, in the absence of facilities and services, the site would lack identity, put pressure on nearby schools and health services, and deliver poor place-making outcomes. A site-specific masterplan must be a precondition of allocation, setting out a walkable layout, a community hub, and a primary school, alongside design code requirements that reflect Canterbury's vernacular form and scale.

4. Drainage, flood risk, and sewer capacity

Merton Park sits upstream of the River Stour floodplain and above the Wincheap lowlands, creating genuine concerns around surface water runoff, nutrient loading, and foul water capacity. These concerns are amplified by the site's sloping topography and its proximity to sensitive ecological receptors. The Strategic Flood Risk Assessment and Habitats Regulations Assessment both highlight the need for detailed mitigation and sequencing. A surface water management plan, nutrient neutrality strategy, and confirmation of sewer headroom from Southern Water must all be secured before any outline approval is granted.

Supporting Evidence and Sources

- [Sustainability Appraisal Appendix G](#): identifies landscape, biodiversity, and access risks.
- [Strategic Flood Risk Assessment \(2025\)](#): outlines drainage and runoff constraints in the Stour catchment.
- [HRA Addendum \(2025\)](#): highlights risk of nutrient impacts in nearby sensitive water catchments.
- [Society member feedback](#): cites consistent concern about sprawl, infrastructure lag, and environmental harm.
- [NPPF \(2024\)](#)

Recommended Changes

Q7-R1 Major revision of Policy N1 to include:

- a. Phased delivery tied to A2 junction and strategic transport routes,
- b. Height and contour limits to avoid ridgeline intrusion,
- c. Landscape-led masterplan and Design Code requirements,
- d. Explicit conditions on drainage, sewerage, and biodiversity net gain.

Q7-R2 If these cannot be secured, the Society recommends:

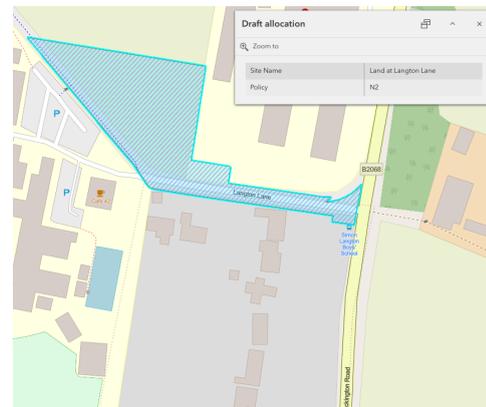
- a. Reducing the allocation's scale, or
- b. Removing N1 entirely from the plan.



Q9: Policy N2 – Land at Langton Lane

Summary Response

The Canterbury Society opposes Policy N2 in its current form. Although the proposed allocation is smaller in scale compared to other strategic sites, its location on the rural fringe of Canterbury, high landscape sensitivity, ecological importance, and poor connectivity make it unsuitable for development at the density and scale currently proposed. If the site is to be retained at all, its footprint must be substantially reduced and accompanied by strict safeguards on landscape, biodiversity, infrastructure capacity, and access. As drafted, the policy fails the tests of soundness in the NPPF and should be reconsidered.



Key Issues / Justification

1. Landscape sensitivity and visual containment

The site forms part of the city's southern fringe, occupying a transitional edge between the urban area and open countryside. Long views extend toward the A2 ridgeline and the Blean uplands.

The Sustainability Appraisal (Appendix G) acknowledges the site's moderate to high landscape sensitivity and raises concerns about visual coalescence and the erosion of rural character, particularly along New House Lane and Langton Lane.

Development in this area would blur the perceptual boundary between Canterbury and the surrounding countryside, contributing to sprawl south of the A28.

To mitigate these harms, any allocation must be limited to the westernmost portion of the site, where visual containment is greater. A landscaped buffer of at least 20 to 30 metres should be retained along the southern and eastern edges to preserve long views and topographical transitions. A landscape-led masterplan must be required, setting parameters for development form, scale, and massing, and ensuring that the scheme respects the area's setting and skyline.

2. Ecological and biodiversity constraints

The proximity of Langton Lane to Blean Woods SSSI, the National Nature Reserve, and functionally connected wildlife corridors raises significant ecological concerns. These corridors are likely to support protected species, and their integrity is flagged as a key risk in the Habitats Regulations Assessment Addendum (2025), which identifies the potential for habitat fragmentation, increased recreational pressure, and edge effects that reduce ecological resilience.

Policy N2 must be amended to require a full ecological impact assessment at outline stage. It should commit to on-site biodiversity net gain delivery with measurable outcomes, the establishment of buffer zones between built form and sensitive habitats, and the strengthening of ecological linkages through native hedgerow planting, copse creation, and long-term monitoring arrangements secured via legal



agreement.

3. Transport access and movement

Langton Lane is a narrow, semi-rural route unsuitable for construction traffic or regular residential movement. The site is remote from essential services, with no current safe pedestrian or cycle routes into the city or to local schools. Public transport coverage is minimal, and the topography further reduces ease of access on foot or bike.

The proposed development therefore fails to meet the NPPF's criteria for sustainable location choice and emphasis on the importance of active travel, reducing car dependency, and ensuring safe access to key services. No development should be permitted on this site unless a transport and movement plan is developed in advance of outline consent. That plan must secure safe pedestrian and cycle connections to the wider network, propose appropriate access routes that avoid overloading Langton Lane, and, where necessary, deliver traffic calming or off-site junction upgrades.

4. Infrastructure and service uncertainty

The Society is concerned that there is no evidence of foul drainage capacity for the site and no published surface water management strategy. Given the topography and ground conditions, there is a risk of increased runoff and pollution of adjacent watercourses. Furthermore, the policy does not set aside space for community infrastructure, meaningful open space, or affordable housing that meets local need. Policy N2 must be revised to ensure that no development occurs without clear evidence of service capacity, including confirmation from Southern Water regarding wastewater infrastructure and a legally enforceable drainage plan. Phasing must align with off-site infrastructure upgrades. Additionally, a site-specific Design Code should be required to ensure that any future development reflects Canterbury's local character, vernacular materials, and appropriate density.

Supporting Evidence and Sources

- [Sustainability Appraisal \(Appendix G\)](#): flags landscape and biodiversity impacts.
- [HRA Addendum \(2025\)](#): identifies pressures on habitat connectivity and protected species.
- [Strategic Flood Risk Assessment \(2025\)](#): suggests increased runoff risk across this part of the urban fringe.
- [Canterbury Society member survey](#): highlights concerns about greenfield creep, poor access, and strain on services.
- [NPPF \(2024\)](#)

Recommended Changes

Q9-R1 Substantially reduce the developable footprint of N2.

Q9-R2 Include a landscape-led masterplanning condition and BNG delivery mechanism.

Q9-R3 Require a comprehensive transport strategy before outline consent.

Q9-R4 Consider whether N2 can be removed entirely and substituted with better-connected brownfield alternatives, in line with the NPPF.



Q10: Policy N3 – Thanington Recreation Ground

Summary Response

The Canterbury Society strongly objects to the proposed allocation of Thanington Recreation Ground under Policy N3. The further reduction of this open space would result in the loss of a vital, high-functioning green area in one of Canterbury's most deprived neighbourhoods.

While part of the wider site was originally appropriated for transport use in the early 1990s, and no formal Fields in Trust designation or covenant is known, Thanington Recreation

Ground has for more than two decades served as a well-used public park and community hub. It is identified within the Council's Green Infrastructure Strategy 2018–2031 as part of the city's strategic open space network and corresponds to the 'parks and gardens' typology (equivalent to a Neighbourhood Scale Park) described in the Green Infrastructure Strategy Evidence Report (2018, pp. 68–70). That typology underpins the adopted open space standards in the Local Plan and establishes the expectation that each urban area should contain a high-quality park serving the local community.

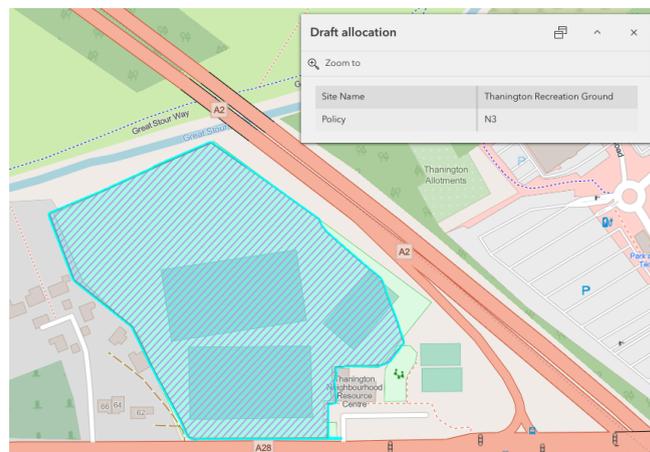
The Thanington Neighbourhood Resource Centre, located on the eastern edge of the Recreation Ground, functions as a vital hub for local residents, providing youth programmes, family support, and wellbeing activities that rely on the adjoining green space for outdoor sessions and safe access. Redevelopment of the Recreation Ground for Park & Ride or highway infrastructure would cause prolonged disruption, restricting access, safety, and amenity for users.

No impact assessment or mitigation plan for the Resource Centre is included in the draft Local Plan or its Sustainability Appraisal. Such disruption would directly conflict with Strategic Policy SA14 (Sustainable Communities, Health, and Green & Blue Infrastructure), which commit to safeguarding community facilities and open space that support residents' physical and mental wellbeing.

Policy N3 is therefore inconsistent with the Council's own evidence base and adopted strategies on open space, health, air quality, and biodiversity. The Society considers the allocation unsound and unjustified, and recommends that Policy N3 be deleted in its entirety, with the Recreation Ground instead protected, enhanced, and managed in partnership with the local community.

Key Issues / Justification

- 1. Conflict with adopted open space, health, and green infrastructure strategies.**
Thanington Recreation Ground functions as a designated green infrastructure asset under the Canterbury District Green Infrastructure Strategy (2018–2031) and aligns with the "Neighbourhood Scale Park" typology set out in the Strategy's Evidence





Report (Appendix A). This typology identifies spaces serving a 1–2 km catchment with informal recreation value for nearby residents - precisely the role Thanington fulfills in an area with limited private gardens or other open space.

Replacing this space with Park & Ride infrastructure contradicts the Playing Pitch Strategy (2020), which calls for retention of existing recreation grounds, and undermines Policy GI1 of the draft Local Plan, which commits to protecting strategic open spaces unless equivalent replacement provision is made - none is proposed here.

The Air Quality Action Plan (2020–25) identifies the Thanington AQMA as a priority area for urban greening, yet Policy N3 would reduce canopy cover and permeable surface in a location already identified as an air quality hotspot. The Council's own Sustainability Appraisal (Appendix H) flags significant negative effects on health and equality if this space is lost, but no compensatory or mitigation measures are presented.

2. Impacts on Health and Social Equity

Thanington is among the most deprived LSOAs in Canterbury District. In such communities, access to free, safe green space is central to wellbeing, child development, and social cohesion. National planning policy (NPPF 2024, paras 99–102) requires existing open space to be protected unless it is demonstrably surplus or replaced by equivalent or better provision - tests that are clearly not met. The draft Plan's Equalities Impact Assessment commits to safeguarding assets that support community wellbeing, yet the proposed reallocation of this recreation ground would remove precisely the kind of accessible green infrastructure that underpins those commitments.

3. Environmental and Biodiversity Concerns

The site acts as an important environmental buffer adjacent to the heavily trafficked A28 corridor. It contributes to air quality mitigation, surface water management, and urban biodiversity. Replacing this permeable, biodiverse landscape with hardstanding for vehicle parking would run counter to the Council's own climate adaptation and biodiversity policies, and to national guidance on delivering biodiversity net gain and enhancing ecological networks.

No proposals have been put forward to offset or compensate for these losses. There is no commitment to habitat enhancement elsewhere, nor any demonstration of net ecological or environmental benefit from the proposed reallocation.

4. Planning History and Current Function

Part of the original, larger, site was appropriated in 1992 for transport use under the Allotments Act 1925, following Secretary of State consent. The land was then allocated for Park and Ride use in the 1993 Local Plan. However, it has since been used continuously as a public recreation ground. A community centre and MUGA were approved in 1999 (CA/99/0907/THA), and today the site plays an integral role in supporting active lifestyles and neighbourhood identity.

This shift in use, supported by local policy and public investment, means that the Council should not rely solely on a 30-year-old legal appropriation to justify current loss - especially in the face of modern policy frameworks that stress the value of



green space in addressing climate, health, and equity challenges.

5. Lack of Strategic Justification or Deliverability Evidence

Policy N3 has been framed as necessary to enable the construction of a new Dover-bound slip road from the A2 at Wincheap - a longstanding infrastructure ambition. However, the Plan contains no clear evidence that this cannot be delivered within the footprint of the existing Park and Ride, or via an alternative alignment. There is no published assessment of current Park and Ride capacity or demand forecasts, no options appraisal, and no utilisation data to demonstrate that relocation or expansion is needed.

In the absence of this information, the proposed loss of a high-functioning community space appears opportunistic and unjustified.

Supporting Evidence and Sources

- [Canterbury Green Infrastructure Strategy \(2018–31\)](#), and [Baseline Evidence](#): identifies Thanington Rec as a key urban park.
- [Playing Pitch Strategy \(2020\)](#): supports retention of neighbourhood-level playing fields.
- [Air Quality Management Plan \(2020–25\)](#): calls for urban greening and local AQMA mitigation.
- [Sustainability Appraisal \(Appendix H\)](#): flags significant adverse effects on community health and equality.
- [NPPF \(2024\)](#)
- [Canterbury Society member survey](#): our member survey identified concern over the loss of local green space and its implications for equality and quality of life.

Recommended Changes

Q10-R1 Delete Policy N3 from the draft Local Plan.

Q10-R2 Include Thanington Recreation Ground within a new or revised Protected Open Space designation.

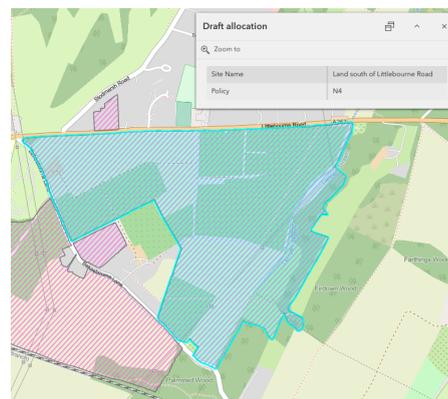
Q10-R3 Commission a community-led enhancement plan for the site in collaboration with local residents, schools, and sports clubs, focused on health, biodiversity, and air-quality improvement outcomes.



Q11: Policy N4 – Land south of Littlebourne Road

Summary Response

The Canterbury Society has serious concerns regarding Policy N4. While we do not oppose the principle of modest, well-designed development in this location, the current allocation lacks essential safeguards relating to flood risk, landscape sensitivity, connectivity, and biodiversity. Without significant revision, the policy fails the tests of soundness under the National Planning Policy Framework and risks harmful, poorly integrated development on a sensitive eastern edge of the city.



Key Issues / Justification

1. Flood Risk and Surface Water Management

The Strategic Flood Risk Assessment (Level 2, August 2025) highlights that the site lies adjacent to Flood Zone 2 and contains identified surface water pathways. These routes pose direct runoff risks into Bekesbourne Lane and the River Stour catchment, already under pressure from neighbouring allocations such as N5 and Barton Business Park.

Cumulative flood modelling in this part of the city appears limited, and there is a lack of clarity on how multiple allocations will be sequenced to avoid compounding risks. To address this, the Society believes Policy N4 must require a site-specific Flood Risk Assessment and mandate the use of blue-green infrastructure (such as swales, rain gardens, or attenuation ponds) as the primary means of water management. Development should be excluded from within at least 8–10 metres of any watercourse, consistent with Environment Agency guidance.

2. Landscape sensitivity and townscape transition

The site lies along a key approach into Canterbury from the east and plays a role in shaping the rural-to-urban transition along Littlebourne Road.

The Sustainability Appraisal (Appendix G) identifies this as a moderately sensitive landscape, with potential for visual harm if the allocation is not carefully contained. Unchecked development risks contributing to ribbon growth and undermining the sense of entry into the historic city.

The Society recommends scaling back the developable area to the western portion of the site, away from the ridgeline, and retaining existing field boundaries, mature trees, and hedgerows. Any new layout should be guided by a landscape-led masterplan that preserves topographical character and long views across the eastern fringe.

3. Transport and sustainable access

Littlebourne Road is already constrained in terms of movement. The route lacks continuous footways and cycle lanes and experiences congestion from daily commuting and visitor traffic. Recent consents and infill development have added further pressure without equivalent investment in infrastructure. If Policy N4 is



retained, it must explicitly require the delivery of pedestrian and cycle links into the city's wider active travel network and discourage car-dominated layouts. Sustainable travel plans, including public transport incentives or car club provision, should be required at outline planning stage. Development should not proceed unless it can demonstrably mitigate pressure on the A257 corridor and enhance east-west connectivity without increasing car reliance.

4. Biodiversity and green infrastructure

The site borders ecological features that contribute to Canterbury's wider green infrastructure network, including potential corridors connected to Barton Wood. Boundary features (especially hedgerows and tree lines) likely support protected species and must be preserved.

The Society believes the allocation should commit to on-site Biodiversity Net Gain delivery, rather than relying on off-site credits or financial compensation. Ecological design should be embedded from the outset, including wildflower meadows, native hedgerow strengthening, and wildlife-friendly construction features (such as bat boxes and swift bricks).

These measures are consistent with Paragraph 180 of the NPPF and the Council's own biodiversity and GI strategies.

5. Design, Layout and Integration with Urban Form

As a gateway site, the quality of design here matters. Without strong policy controls, there is a risk of delivering a generic, low-density suburban estate out of keeping with Canterbury's character.

Policy N4 should require a site-specific Design Code aligned with local vernacular materials (flint, red brick, clay tile), a compact and legible street layout, and integration of tree-lined streets and public open spaces.

Development should enhance the existing neighbourhood, not create a poorly connected enclave, and must support the goal of building beautiful, inclusive places.

Supporting Evidence and Sources

- [Strategic Flood Risk Assessment \(SFRA Level 2, 2025\)](#): identifies fluvial and surface water risks near site,
- [Sustainability Appraisal \(Appendix G\)](#): flags landscape sensitivity and settlement edge issues,
- [Green Infrastructure Strategy \(2018–31\)](#): supports landscape buffering and biodiversity retention,
- [NPPF \(2024\)](#)
- [Society member survey responses](#): expressed concerns about flooding, character, and lack of active travel.

Recommended Changes / Next Steps

Q11-R1 Reduce the developable area to western portion only.

Q11-R2 Add new policy clauses requiring flood resilience, biodiversity safeguards, and active travel links.

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Q11-R3 Include design coding, landscape buffers, and infrastructure delivery triggers tied to phased development.

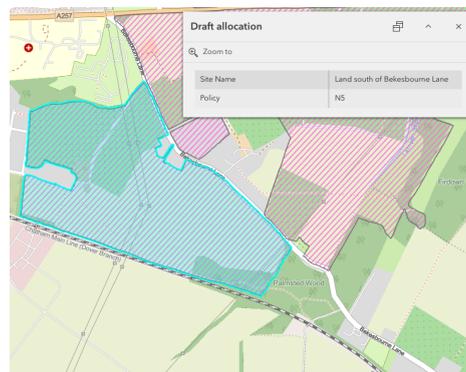
Q11-R4 If these measures are not secured, the Society recommends removing the allocation from the Local Plan.



Q12: Policy N5 – Land south of Bekesbourne Lane

Summary Response

The Canterbury Society opposes Policy N5 in its current form. While modest in scale, the site poses disproportionate risks in terms of biodiversity loss, surface water flood vulnerability, poor integration with the settlement form, and insufficient infrastructure support. The allocation appears to be driven more by land availability than coherent spatial planning. Unless the site is substantially scaled back and re-purposed for green infrastructure and nature recovery, it should be removed from the Local Plan.



Key Issues / Justification

1. **Ecological sensitivity and habitat fragmentation**

The site plays a strategic ecological role, connecting Barton Wood with habitats to the south of the A257. According to the Habitats Regulations Assessment Addendum (August 2025), it is functionally linked to species associated with the Thanet Coast and Sandwich Bay SPA. The parcel contains semi-natural grassland, tree belts, and hedgerows which act as vital corridors for pollinators, small mammals, and nesting birds. Development here would risk severing these linkages, increasing recreational pressure on adjacent habitats, and eroding ecological margins that support local biodiversity resilience.

The Society recommends that this site should be removed from the Local Plan unless detailed ecological surveys and a nutrient neutrality strategy can confirm, beyond reasonable scientific doubt, that no adverse effects will occur. If retained, development should be confined to a small western portion, with the remainder secured for on-site Biodiversity Net Gain (BNG) through hedgerow reinforcement, marginal habitat protection, and species-specific enhancements.

2. **Flood risk and surface water management**

N5 sits within a shallow natural basin, as identified in the Strategic Flood Risk Assessment Level 2 (2025), with notable surface water flood pathways. Introducing impermeable surfaces here risks increasing runoff towards the River Stour and creating cumulative flood impacts, particularly in combination with upstream sites like N4. These risks are likely to worsen under climate change scenarios.

Policy N5, if retained, must be conditioned on a detailed site-specific Flood Risk Assessment and a sustainable drainage strategy that demonstrates greenfield runoff rates or better. Blue-green infrastructure must be prioritised, including swales, retention basins, and rain gardens, and no development should be permitted until this is secured and approved.

3. **Access, transport safety, and cumulative impact**

Bekesbourne Lane is a constrained, semi-rural road lacking adequate width, footways, or safe crossing points. The area is already experiencing mounting



pressure from nearby allocations (N4, Barton Business Park) and recent consents. N5 would add further vehicle movements onto an already fragile network, undermining road safety and increasing car dependency. There are also no direct walking or cycling routes connecting the site to services, schools, or public transport. The Society considers that no development should proceed here unless a comprehensive access and movement plan is adopted, including: new pedestrian and cycle links to Barton Road and key destinations, junction safety upgrades, and integration into east Canterbury's sustainable travel network.

4. Urban form, containment, and townscape impact

This site does not relate well to the existing built form of the city. It projects beyond the defensible boundary of Barton Road and would encroach into the rural fringe without natural containment.

The Sustainability Appraisal warns against piecemeal edge-of-town sites that contribute to “greenfield creep” and erode the compact, legible shape of Canterbury. The Society believes that, if the site is retained in any form, it should be re-framed as a green infrastructure-led scheme with a strong landscape buffer, ecological emphasis, and a design code that minimises visual intrusion and avoids the appearance of speculative suburban expansion.

5. Public opposition, service capacity and speculative character

Feedback from the Society's membership and wider consultation responses raised repeated concerns over this site's proximity to sensitive habitats, lack of school and GP capacity, and disconnected location.

The allocation has no clear infrastructure phasing plan, no confirmed education or health provision, and no compelling justification within the settlement hierarchy. In our view, this renders the allocation speculative, premature, and inconsistent with NPPF tests of deliverability and justification.

Supporting Evidence and Sources

- [Habitats Regulations Assessment Addendum \(August 2025\)](#): flags ecological sensitivities and functional linkages,
- [Strategic Flood Risk Assessment Level 2](#): identifies surface water risk and basin topography,
- [Sustainability Appraisal \(Appendix G\)](#): warns against townscape and connectivity harms,
- [Green Infrastructure Strategy \(2018–2031\)](#): supports biodiversity corridors and ecological connectivity,
- [Member survey and consultation responses](#): highlight infrastructure concerns and ecological value.

Recommended Changes / Next Steps

- Q12-R1** Remove Policy N5 from the Local Plan, or:
- a. Scale back to a small, western section,

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- b. Re-purpose majority of the site for habitat restoration, flood mitigation, and landscape buffer,
- c. Require strict conditions on access, drainage, and biodiversity net gain.

Q12-R2 If delivery risks and infrastructure uncertainties remain unresolved, this site is not sound and should be omitted.

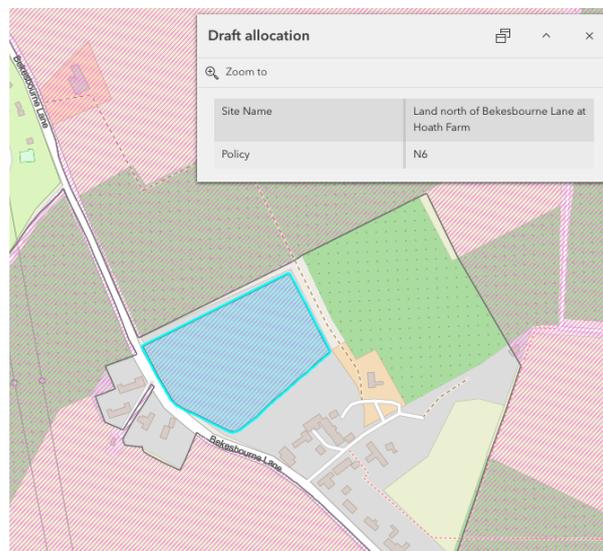


Q13: Policy N6 – Land north of Bekesbourne Lane (Hoath Farm)

Summary Response

The Canterbury Society does not support Policy N6 in its current form. While this site appears more visually contained than N4 or N5, the policy lacks sufficient safeguards on flood risk, ecological constraints, access, and landscape integration. As drafted, the allocation risks extending Canterbury's built form too far east, placing additional pressure on already constrained infrastructure and risking poorly integrated development.

We recommend that the allocation be scaled back to its western portion near Barton Court access, subject to a robust Design Code and a landscape-led masterplan. Any delivery should be conditional upon the preparation and adoption of a wider East Canterbury Infrastructure and Access Plan.



Key Issues / Justification

1. Landscape sensitivity and edge-of-settlement sprawl

N6 occupies a transitional edge between urban Canterbury and open countryside to the east. The eastern portion lacks natural defensible boundaries and is exposed in views from the A257 and across the Stour valley. The Sustainability Appraisal (Appendix H) identifies moderate landscape sensitivity and risks of visual coalescence with Bekesbourne. If not scaled back, the allocation would contribute to a linear eastward expansion inconsistent with compact settlement principles. The Society therefore recommends restricting development to the western half of the parcel, closer to Barton Court and visually enclosed. A permanent landscaped buffer must be established on the eastern edge, and a landscape-led masterplan should guide development form and minimise visual impact.

2. Ecological value and water environment risks

The Habitats Regulations Assessment Addendum (August 2025) indicates potential ecological impacts due to functional connectivity with protected sites (Thanet Coast and Sandwich Bay SPA). Field margins within the site provide habitat for a range of species, while topography and clay soils increase the risk of surface water flooding and runoff into the Stour catchment. Policy N6 must require a full ecological constraints assessment, nutrient neutrality screening, and delivery of biodiversity net gain (BNG) through naturalised attenuation, reinforced habitat corridors, and 10-metre protective buffers around any watercourses or sensitive features



3. Access constraints and car dependency

Bekesbourne Lane is a narrow, semi-rural route with no safe footways, cycle paths, or lighting. The site is remote from schools, GP surgeries, and local centres, and currently lacks any sustainable transport links. Multiple new allocations (N4, N5, Barton Business Park) are also dependent on this constrained network.

Policy N6 must therefore be contingent on a coordinated access solution for the entire east Canterbury quadrant. New walking and cycling links must be established, with off-site improvements to connect safely into the city's transport network.

Occupation should be phased to align with infrastructure delivery and bus service enhancement.

4. Urban design and contextual integration

Without robust design guidance, development at N6 risks becoming a generic, car-reliant estate poorly integrated with its surroundings. It may erode the rural edge of Canterbury and create a visual and functional disconnect with the existing settlement pattern.

To avoid this, Policy N6 must include a site-specific Design Code, specifying materials, massing, density, and public realm principles aligned with the character of Canterbury's urban fringe. Layouts should avoid cul-de-sac sprawl, include tree-lined streets and open spaces, and reinforce local distinctiveness.

5. Cumulative Infrastructure Pressure and Lack of Delivery Strategy

N6 is part of a broader east Canterbury growth cluster including N4, N5, Barton Business Park, and possibly a WWTW redevelopment. Yet there is currently no overarching infrastructure delivery or phasing strategy for this area. The Canterbury Infrastructure Delivery Plan (IDP, 2022–24) fails to specify costs, triggers, or sequencing across these sites, raising concerns about piecemeal development, uncoordinated access, and overstretched services.

No planning permission for N6 should be granted until a formal East Canterbury Infrastructure & Access Plan is developed. This must set out shared off-site infrastructure (e.g. drainage, transport, education), cost allocations, and phasing milestones.

Supporting Evidence and Sources

- [HRA Addendum \(August 2025\)](#): flags ecological sensitivity and SPA species,
- [SFRA Level 2 \(2025\)](#): identifies flood and drainage risks,
- [Sustainability Appraisal \(Appendix H\)](#): assesses landscape and access constraints,
- [Canterbury Draft IDP \(2022/24\)](#): highlights infrastructure gaps in East Canterbury,
- [Member feedback and Society survey](#): expresses concern over cumulative pressure and urban form.

Recommended Changes

Q13-R1 Scale back Policy N6 to the most contained western portion,

Q13-R2 Require a Design Code, ecological mitigation strategy, and sustainable drainage infrastructure,

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Q13-R3 Reference a cross-site infrastructure delivery plan for East Canterbury before any planning permissions are granted,

Q13-R4 If these elements cannot be secured, the allocation should be removed.

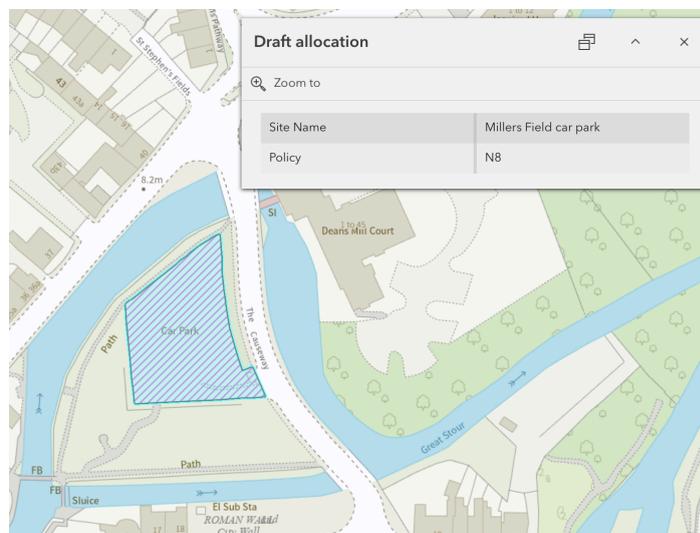


Q15: Policy N8 – Millers Field Car Park

Summary Response

The Canterbury Society offers cautious support for the principle of repurposing Millers Field as high-quality riverside public space - if it genuinely enhances biodiversity, access, and the continuity of the city's green infrastructure network.

However, Policy N8 as drafted also permits mixed-use redevelopment, including potential residential development, without demonstrating that this would be compatible with flood-risk constraints, heritage sensitivities, or the city's parking and accessibility needs.



Public feedback, including Canterbury City Council's 2022 Residents' Survey, shows strong parallel interest in both riverside enhancement and accessible city-centre parking. While over 220 respondents supported rewilding and riverside improvement, more than 190 expressed concern about the loss of car-parking capacity and disabled access.

The Local Plan must therefore balance public-realm ambitions with clear, evidence-based planning for city-centre accessibility, ensuring that any redevelopment delivers measurable public benefit and avoids displacing essential parking functions.

Key Issues / Justification

1. Ambiguity in Policy Intent – open space or mixed-use?

The Green Infrastructure Strategy (2018–31) identifies the riverside corridor through Millers Field as a priority for green-infrastructure enhancement, yet Policy N8 introduces ambiguity by allowing “redevelopment for a mix of uses including residential.”

Without a clear hierarchy of outcomes (for instance, prioritising ecological restoration and flood resilience over built development) the policy risks undermining its own environmental objectives and creating conflict with the Strategic Flood Risk Assessment (2025) and the city's climate-adaptation goals.

2. Visual prominence, heritage, and riverside setting

Millers Field occupies a highly visible stretch of the riverside within Canterbury's historic core, adjacent to key heritage assets. The site's redevelopment offers an opportunity for ecological and visual improvement, but any introduction of residential use must be demonstrably compatible with heritage views, building scale, and riverside character.



The Council's Heritage Strategy Delivery Plan (2021–24) stresses the need to preserve open views toward the Westgate Towers and maintain the integrity of riverside greenspace.

3. Loss of parking and absence of utilisation evidence

While the Society supports the long-term aim of reducing surface parking in favour of sustainable transport, no published utilisation data shows that Millers Field is underused or redundant.

Without transparent data on occupancy, revenue, and disabled-bay demand, the justification for redevelopment remains weak. Moreover, there is no strategy explaining where displaced parking (including Blue-Badge and business-permit users) would be re-provided or how modal shift will offset demand.

4. Relationship with on-street parking and conservation goals

Reducing off-street capacity may inadvertently increase on-street parking pressure in Conservation Areas where the Council is simultaneously seeking to declutter the public realm.

Retaining a managed, short-stay or accessible parking function in the short term could support a phased reduction of kerbside parking elsewhere, aligning better with the city's heritage and public-realm objectives.

5. Public support for greening, but concern over access

Survey evidence demonstrates that residents value both urban greening and practical city-centre access. The future of Millers Field must therefore not be framed as a binary choice between ecology and accessibility. The Local Plan should show transparently how any redevelopment will achieve a net public benefit (environmental, social, and operational) supported by viable design and transport evidence.

Supporting Evidence and Sources

- [NPPF \(2024\)](#)
- [Canterbury Heritage Strategy Delivery Plan \(2021–24\)](#): prioritises protection of key views and public realm
- [Conservation Area Appraisal](#): highlights importance of open space near Westgate Towers
- [Strategic Flood Risk Assessment Level 2 \(2025\)](#): confirms flood zone designation and residual risk
- [Green Infrastructure Strategy \(2018–31\)](#): identifies need for city centre greening and climate adaptation
- [Canterbury Society member survey](#): highlights desire for enhanced riverside space and opposition to encroachment
- Canterbury City Council Residents' Survey (2022): "Green spaces" was the 4th most selected priority (547 mentions) for what makes somewhere a good place to live; over 190 expressed concern about parking



Recommended Changes

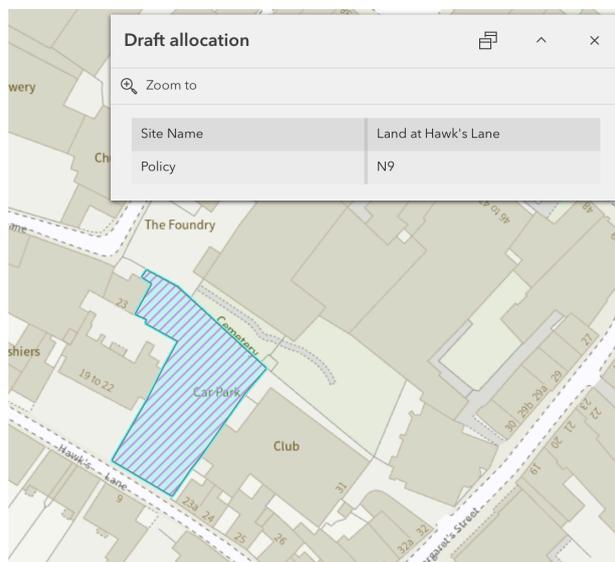
- Q15-R1** Clarify Policy N8's primary purpose: open-space and biodiversity enhancement should take precedence over any built development.
- Q15-R2** If residential use is retained, require a sequential flood-risk test, viability assessment, and heritage impact statement before allocation is confirmed.
- Q15-R3** Publish parking-utilisation and occupancy data to evidence the case for redevelopment.
- Q15-R4** Integrate Policy N8 within a comprehensive city-centre parking and access strategy to prevent displacement impacts.
- Q15-R5** Commit to a community-led design process to ensure the site's reuse reflects public priorities for greening, accessibility, and heritage sensitivity.



Q16: Policy N9 – Land at Hawk’s Lane

Summary Response

The Society offers qualified support for the allocation of the Hawk’s Lane site, provided that the policy is substantially strengthened to ensure conservation-led development that aligns with Canterbury’s historic character, delivers genuinely affordable homes, and enhances the public realm. As a rare infill opportunity within the city’s medieval core, the site presents real potential for sensitive regeneration. However, it also carries risks of overdevelopment, heritage harm, and the proliferation of short-term or transient accommodation. To be sound, the policy must be specific in its expectations around scale, design, tenure, and public benefit.



Key Issues / Justification

1. Heritage sensitivity and urban morphology

Located within the Canterbury City Conservation Area and in close proximity to listed buildings and medieval street patterns, the site demands the highest level of design quality and contextual awareness. Development must respond to the traditional urban grain, rooflines, and architectural rhythm of the surrounding area. The backland nature of the site and its tight spatial constraints increase the risk of visual intrusion, overshadowing, and disruption to the character of Hawk’s Lane. The Sustainability Appraisal acknowledges moderate heritage sensitivity and the need for careful design. A conservation-led approach is therefore essential, including clear parameters on maximum building height and massing to preserve the area’s historic silhouette and permeability.

2. Tenure, affordability, and social value

The Society believes the site should be reserved for low-carbon, car-free housing serving local needs (such as keyworkers, young adults, and downsizers) rather than speculative student blocks or short-term lets.

This part of the city is already under pressure from tourist accommodation and transient occupancy, which risks undermining civic life and community cohesion. Without clear policy safeguards, the site may fail to deliver long-term housing benefit or public value.

Affordability in perpetuity should be the default position, with a presumption in favour of social or affordable rent. The policy should explicitly discourage uses that do not contribute to the stability and diversity of the city centre population.



3. Public realm and pedestrian activation

Hawk's Lane is an important pedestrian corridor, currently underused and sometimes perceived as unsafe. Sensitive redevelopment of the site offers a chance to activate this space through passive surveillance, well-designed frontages, and modest enhancements to the streetscape.

Opportunities exist for subtle landscaping, lighting, and potentially interpretation or public art that reinforces the area's cultural and historical significance. Any development should improve pedestrian experience and visual amenity while maintaining the lane's permeability and open character.

A design brief or planning guidance note should require proposals to demonstrate how they will enhance Hawk's Lane's social and civic role.

Supporting Evidence and Justification

- [Canterbury Conservation Area Appraisal \(adopted 2023\)](#)
- [Sustainability Appraisal \(Appendix H\)](#): identifies moderate sensitivity and design risk
- [NPPF \(2024\)](#)
- [Member survey \(2025\)](#): concerns about overdevelopment, lack of affordability, and the growth of transient accommodation

Recommended Changes

Q16-R1 Revise Policy N9 to require a Conservation-Led Design Brief and define the maximum building envelope appropriate to the site's setting

Q16-R2 Include a presumption against short-term lets and student-only housing; require at least 50% affordable homes

Q16-R3 Mandate car-free design, high-quality materials in keeping with local vernacular, and sustainable construction standards

Q16-R4 Require public realm enhancements to Hawk's Lane, including street-facing entrances, lighting, planting, and passive surveillance features

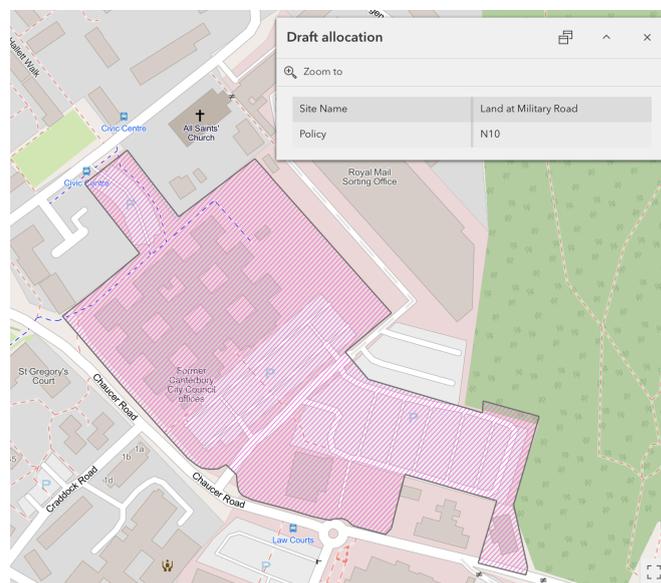


Q17: Policy N10 – Land at Military Road (former CCC offices)

Summary Response

The Canterbury Society supports the principle of redeveloping the former Council offices at Military Road, recognising the potential of this brownfield site to contribute meaningfully to city-centre housing supply, improved design quality, and sustainable placemaking. However, the policy as currently drafted is too generic and permissive. Without stronger safeguards, it risks enabling development that undermines local character, fails to meet affordability needs, or misses a rare opportunity for public value creation.

The site should serve as a flagship for affordable, sustainable, and heritage-sensitive redevelopment - showcasing how Canterbury can meet modern housing needs while enhancing its urban fabric.



Key Issues / Justification

1. Affordable housing and sustainability standards

As a former Council-owned site, this development should be exemplary in delivering homes that meet genuine local need. Feedback from residents has consistently highlighted the lack of smaller, affordable homes for keyworkers, young people, and downsizers.

The Society supports setting a minimum 40–50% affordable housing threshold, with a strong presumption in favour of social rent or genuinely affordable tenure. This should include protection from resale at market rates, avoiding speculative uplift through shared ownership loopholes. Sustainability must be embedded from the outset, with zero-carbon design, solar PV integration, and high thermal performance expected as standard.

2. Public benefit and active frontage

Military Road suffers from poor urban activation, and this site's redevelopment provides a critical chance to reanimate the street and return civic value. The ground floor should contribute to public life - whether through micro-retail, health or social services, community workspace, or other low-impact uses that encourage footfall and community engagement.

Public realm enhancements should form part of the scheme, including lighting, tree planting, and well-designed seating or green space. Improved permeability to Falala Way would help knit this corner back into the urban network.



3. Connectivity and low-car urban living

Given its central location and proximity to bus routes and the city cycle network, this site should set a precedent for car-free living. The policy should include a presumption against general car parking, with exceptions only for accessible or service bays.

Provision should be made for secure cycle storage, e-bike charging, and alignment with active travel strategies.

A Travel Plan or equivalent mobility support mechanism (such as mobility credits or car club incentives) should be required at application stage to embed sustainable travel behaviours from the outset.

Supporting Evidence and Sources

- [Canterbury Conservation Area Appraisal](#): highlights importance of built form, scale, and permeability along Military Road and adjacent historic corridors
- [Sustainability Appraisal \(Appendix H\)](#): flags potential for urban design uplift and brownfield regeneration if handled sensitively.
- [Green Infrastructure Strategy \(2018–31\)](#): supports greening and permeability in town centre redevelopment sites.
- NPPF (2024): require high design standards, sustainable transport integration, and reuse of brownfield land.
- [Society member feedback](#): calls for affordable housing, architectural quality, and public realm improvement.

Recommended Changes

Q17-R1 Include a site-specific Design Code with clear expectations on scale, materials, and frontage design.

Q17-R2 Set a minimum 40–50% affordable housing requirement, prioritising social rent or equivalent.

Q17-R3 Prohibit tourist or student-only development; prioritise homes for long-term residents.

Q17-R4 Presume against general car parking and embed sustainable travel infrastructure and behaviour incentives.

Q17-R5 Secure a Public Realm Strategy to enhance the civic contribution of this strategic brownfield site.

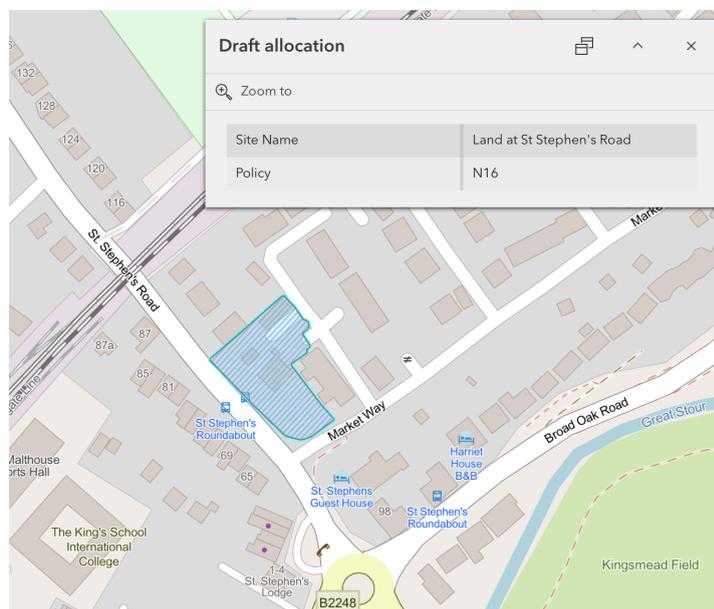


Q23: Policy N16 – Land at St Stephen’s Road

Summary Response

The Canterbury Society objects to Policy N16 in its current form. The site is highly sensitive in heritage, landscape, and transport terms. It occupies a visually prominent location on the northern approach to Canterbury, acting as a green edge and transition zone between suburban and rural character. The draft policy fails to recognise or mitigate these sensitivities, and offers no evidence of design-led planning or infrastructure alignment.

Given its limited capacity for housing delivery and the disproportionate risks of environmental and visual harm, the Society considers the policy unsound. Unless radically revised, Policy N16 should be removed from the Local Plan. If retained, the policy must include binding conditions on design, access, biodiversity, and housing density.



Supporting Evidence and Justification

1. Heritage and Landscape Sensitivity

St Stephen’s Hill functions as a transitional landscape between Canterbury’s suburban edge and its rural hinterland, offering long-range views into the historic city core. It forms part of the broader setting of the Canterbury Conservation Area and helps frame the visual approach into the city from the north. The draft policy includes no requirement for a Landscape and Visual Impact Assessment, nor any design expectations that reflect the sensitivities of this key gateway. There is no mention of roofscape rhythm, view corridors, or townscape integration. The NPPF emphasises the importance of locally distinctive design and the need for new development to integrate with the form and function of its surroundings. These principles are not reflected in Policy N16. Without landscape-led parameters, the allocation risks replacing a valuable open transition zone with generic, visually intrusive development.

2. Transport pressure and lack of access planning

St Stephen’s Road is already a known congestion pinch point, particularly during school and university commuting hours. It serves multiple nearby education facilities and is one of the few north–south corridors into the city. The Local Plan proposes to allocate the site without any supporting Transport Assessment, access modelling, or pedestrian safety analysis. There is no indication that junction improvements, traffic calming, or active travel connections are being secured as part of the allocation. This



is a missed opportunity to align with the NPPF, including the need for development to support active travel, minimise traffic impact, and integrate with sustainable transport networks. Any additional housing here, without mitigation, risks compounding safety and air quality concerns in an already pressured location.

3. Loss of green infrastructure and biodiversity value

The land at St Stephen's Road contributes to a green corridor between suburban gardens and rural habitats, supporting biodiversity and offering a soft edge to the built-up area. The policy makes no reference to biodiversity net gain, habitat retention, or green infrastructure design. There is a real risk that development here will lead to excessive hard landscaping, perimeter fencing, and the erosion of permeability between neighbourhood and countryside. The NPPF requires planning decisions to protect and enhance valued landscapes and ecological networks. The absence of any green infrastructure requirement in N16 undermines both local and national policy aims and weakens the wider landscape resilience of this part of the city.

Supporting Evidence and Sources

- [NPPF \(2024\)](#)
- [Canterbury Conservation Area Appraisal](#)
- [Heritage Strategy Delivery Plan \(2021–24\)](#)
- [Green Infrastructure Strategy \(2018–31\)](#)
- [Green Infrastructure Strategy Baseline Evidence \(2018-31\)](#)
- [Sustainability Appraisal \(Appendix H\)](#)
- [Canterbury Society member survey responses](#)

Recommended Changes

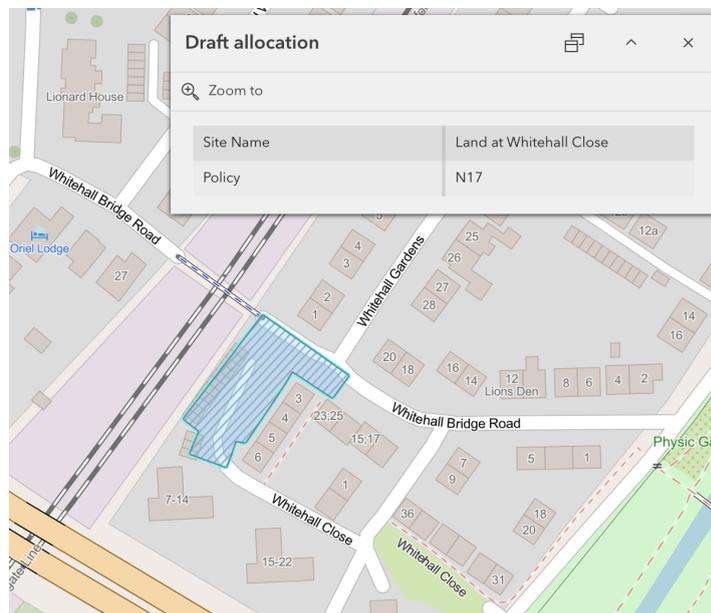
Q23-R1 Policy N16 should be revised to include a formal landscape-led design requirement, a cap on housing numbers to avoid overdevelopment, and measurable conditions around biodiversity net gain and surface water management. A full Transport Assessment should be required, with any occupation phased in line with junction upgrades or local access improvements. If these measures cannot be secured, the site should be removed from the Plan.



Q24: Policy N17 – Land at Whitehall Close

Summary Response

The Canterbury Society offers cautious support for the principle of modest, affordable infill development on underused plots such as Whitehall Close. However, Policy N17 is currently unsound due to a lack of detail regarding design standards, access constraints, and public engagement. The site presents access and enclosure challenges, risks overdevelopment in a tightly-knit neighbourhood, and may result in the unmitigated loss of valuable informal amenity space. Unless revised to include robust safeguards on design quality, density, infrastructure, and community integration, this policy risks undermining the very neighbourhood cohesion it ought to enhance.



Key Issues / Justification

1. Access and circulation constraints

Whitehall Close is a narrow, residential cul-de-sac with limited vehicular movement and turning space. The Strategic Land Availability Assessment and Sustainability Appraisal (Appendix G) both flag the site as constrained, with uncertain access arrangements and likely tension between new development and existing parking, service, and amenity use. The current policy lacks any requirement for an access design statement, vehicle visibility splays, or off-street arrangements to avoid exacerbating conflict in what is already a spatially limited streetscape. Without these, the allocation may create significant access, safety, and servicing issues.

2. Design, density, and neighbourhood character

The site appears to function as an informal green buffer, softening the transition between homes and providing visual openness within the Close. No policy mechanism is included to limit the number of units, control building height or massing, or require design to reflect the character of the existing built form. In the absence of a design code or planning brief, this leaves the site vulnerable to over-intensive or out-of-character development that may damage local trust and visual harmony.

3. Public engagement and amenity loss

There is no evidence that the Council has consulted local residents on the loss of this space, nor any recognition in the policy of its potential function as informal green infrastructure. In constrained urban areas, even small pockets of green or open space contribute to health, outlook, biodiversity, and neighbourhood resilience.

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Development that proceeds without public involvement (particularly where amenity space is lost) is likely to generate opposition and undermine the perception of fair, inclusive planning. NPPF principles on early engagement, amenity retention, and sustainable layout have not been met.

Supporting Evidence and Sources

- [Strategic Land Availability Assessment \(SLAA\)](#): flags access and constraint issues
- [Sustainability Appraisal \(Appendix G\)](#): raises concerns around amenity loss and site containment
- [NPPF \(2024\)](#)
- [Member survey feedback](#): highlights concern over neighbourhood infill, enclosure, and lack of consultation

Recommended Changes

- Q24-R1** Include a maximum dwelling cap (e.g. 2–3 homes) and require low-rise, low-density design
- Q24-R2** Mandate a transport and access assessment with appropriate visibility and turning provision
- Q24-R3** Require alignment with an adopted or site-specific design code reflective of the local street pattern
- Q24-R4** Include a policy condition for community engagement and a Statement of Community Involvement prior to application
- Q24-R5** Consider retaining part of the space for public amenity or open buffer to soften the development's edge

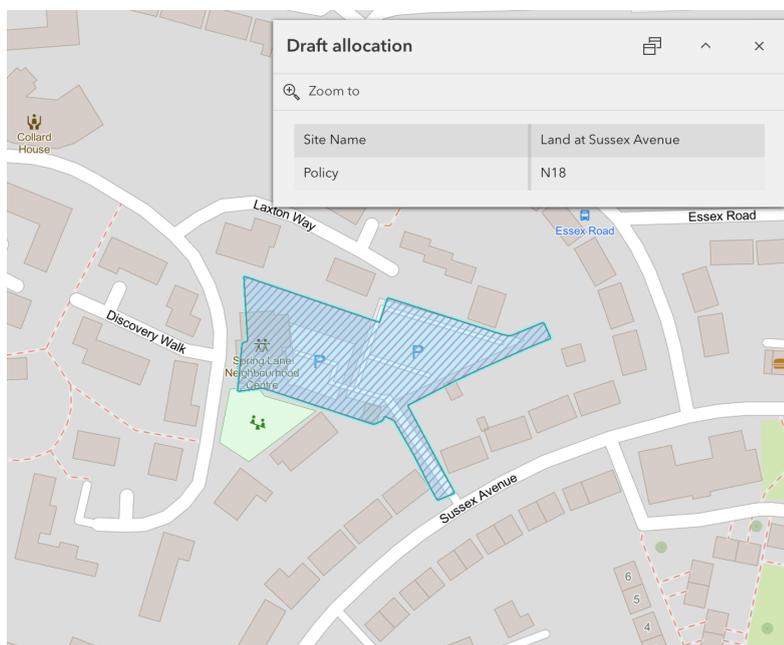


Q25: Policy N18 – Land at Sussex Avenue

Summary Response

The Canterbury Society objects to Policy N18 in its current form. The site is a constrained backland plot with limited access, high sensitivity to residential amenity, and poor integration with the surrounding urban fabric. As currently drafted, the policy lacks adequate safeguards around access, layout, design, biodiversity, and public engagement. Without these, the policy is not sound and risks delivering poor-quality, poorly integrated development with disproportionate impacts on neighbouring homes.

We recommend that Policy N18 be either removed from the Local Plan or substantially revised to include strong controls on scale, design, access, and local engagement.



Key Issues / Justification

1. Constrained layout, access, and residential amenity risks

The site lies behind existing dwellings on Sussex Avenue and appears to be landlocked other than a narrow, informal access strip. This creates immediate concerns around fire access, refuse collection, emergency vehicle circulation, and potential overlooking or loss of privacy to adjacent homes. The SLAA notes “limited development potential,” while the Sustainability Appraisal flags risks to neighbourhood cohesion and amenity. Without defined visibility splays, a vehicle tracking plan, or a refuse strategy, the site may prove operationally unworkable.

2. Risk to local character and spatial grain

Sussex Avenue is defined by low-rise, evenly spaced housing, with consistent front gardens and a coherent building line. The introduction of backland units (particularly if over-scaled) would disrupt this spatial rhythm. The site is currently greened and contributes to the overall openness of the block. Policy N18 provides no protections for this character and omits any reference to design codes, height restrictions, or material compatibility. Infill here must be subservient, low-rise, and landscape-integrated.

3. Absence of public engagement, biodiversity safeguards, and servicing detail

There is no published evidence of consultation with local residents, despite the site sitting immediately adjacent to private homes. Nor is there any ecological baseline or commitment to Biodiversity Net Gain. Mature vegetation may be present, contributing to local ecology and amenity. The absence of drainage, lighting, or servicing criteria



further weakens the case for allocation, particularly in a location with such limited scope for mitigation.

Supporting Evidence and Sources

- [Strategic Land Availability Assessment \(2025\)](#): site flagged as constrained, with limited development potential
- [Sustainability Appraisal \(Appendix G\)](#): raises concerns about access, character, and residential amenity
- [NPPF \(2024\)](#)
- [Green Infrastructure Strategy \(2018–31\)](#): supports retention of soft landscaping and biodiversity within urban settings

Recommended Changes

Q25-R1 Cap total dwellings at no more than 2–3 units, with low-rise, small-footprint designs

Q25-R2 Mandate off-street parking, refuse access, and private amenity space

Q25-R3 Require development to follow a site-specific Design Code, including height, form, and material controls

Q25-R4 Include a Statement of Community Involvement as a condition of planning

Q25-R5 Secure on-site Biodiversity Net Gain, tree retention/planting, and sustainable drainage solutions



Q44: Habitats Regulations Assessment (HRA)

Summary Response

The Canterbury Society welcomes the Council's continued use of the Habitats Regulations Assessment (HRA) process and the publication of the August 2025 Addendum. However, we believe the HRA, as currently drafted, is not legally compliant or fit for purpose.

The draft Plan relies on a proposed new reservoir at Broad Oak to meet long-term potable water and wastewater needs. However, no feasibility, environmental, or HRA assessment has been published to confirm that this project can proceed without significant adverse effects on the River Stour SAC/SSSI. The reliance on an untested and potentially harmful infrastructure intervention undermines the HRA's conclusion of no adverse effect on site integrity. An independent feasibility study, commissioned jointly by the Council and the Environment Agency, should be undertaken before the Plan proceeds to Regulation 19.

We object to the HRA because it fails to meet the precautionary principle required by the Habitats Regulations 2017, lacks certainty and enforceability in the delivery of mitigation, and relies too heavily on assumptions and deferred project-level assessments. Cumulative, long-range, and cross-boundary impacts are inadequately addressed. A comprehensive redraft is required, with binding mitigation, phasing of development linked to delivery, and clearer integration into the Local Plan's policy framework.

Key Issues / Justification

1. Water quality, nutrient neutrality, and wastewater treatment

The HRA identifies likely significant effects (LSEs) on multiple European sites, including Stodmarsh SAC/SPA and the Thanet Coast SAC, primarily due to nutrient loading and wastewater pressures. Yet it fails to present a confirmed mitigation package or identify delivery vehicles or funding mechanisms. This contravenes Regulation 105 of the Habitats Regulations 2017 and the case law established in *People Over Wind v Coillte Teoranta (C-323/17)*, which requires mitigation certainty at the plan-making stage.

We cannot see a Nutrient Neutrality Plan embedded in the policy, and no binding safeguards ensure mitigation will be operational before housing occupation.

2. Air quality and traffic-related pollution

The HRA dismisses risks to Blean Woods SAC on the basis of a 200m screening threshold, despite evidence that nitrogen deposition impacts extend far beyond this distance. It assumes emission neutrality based on broad modal shift ambitions, without enforceable delivery mechanisms. This underestimates cumulative traffic effects on sensitive habitats, particularly given the growth corridor between Canterbury and Whitstable.

3. Recreational pressure on Natura 2000 sites

While recreational pressure on Stodmarsh, the Thanet Coast SPA, and Blean Woods SAC is acknowledged, there is no quantification of visitor growth, no delivery triggers,



and no identified governance or funding model (e.g. wardening, access zoning, Suitable Alternative Natural Greenspace (SANG) provision).

Given the scale of growth proposed near these sites, absence of enforceable phasing is a material legal risk.

4. Methodological flaws and delivery uncertainty

The HRA relies heavily on assumptions of project-level mitigation without embedding requirements at plan level. There is no cumulative impacts matrix, no site-by-site list of mitigation, and no clarity on delivery bodies or funding. This contradicts established case law (*Wealden, Sweetman, Holohan*), which makes clear that mitigation cannot be deferred and must be certain at the plan stage.

5. Climate adaptation and biodiversity integration

Finally, the HRA does not integrate Canterbury's own emerging biodiversity and climate adaptation policies, nor Kent's Local Nature Recovery Strategy (LNRS). This is a missed opportunity to embed mitigation within a wider framework of nature recovery, canopy expansion, and urban greening. By treating BNG as a minimum legal compliance exercise and failing to reference LNRS priorities, the HRA risks being siloed rather than contributing to a district-wide ecological recovery strategy.

Supporting Evidence and Sources

- [Regulation 105, Habitats Regulations 2017](#): requirement for certainty and enforceability of mitigation
- [CJEU Case C-323/17 \(People Over Wind\)](#): no reliance on mitigation unless secured and evidenced
- [Wealden DC v SSCLG \(2017\)](#): reinforces the need to test cumulative impacts at the plan level
- [Sweetman v An Bord Pleanála \(C-258/11\)](#): precautionary principle applies at the strategic stage
- [Holohan v An Bord Pleanála \(C-461/17\)](#): plan-level HRA must assess all relevant effects
- [Stodmarsh Nutrient Neutrality Guidance \(Natural England\)](#): establishes methodology for mitigation
- [Sustainability Appraisal \(2025\)](#): flags traffic, air pollution, and biodiversity risk from multiple allocations

Recommended Changes / Next Steps

Q44-R1 Publish a binding Nutrient Neutrality Plan and secure funding mechanisms for wastewater mitigation.

Q44-R2 Revise traffic emission modelling for Blean Woods SAC to reflect cumulative growth.

Q44-R3 Require quantifiable mitigation (SANG, wardens, zoning) for recreation impacts with clear triggers.

Q44-R4 Integrate HRA with LNRS priorities and climate adaptation policy to create a joined-up biodiversity strategy.

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Q44-R5 Include a requirement for an independent feasibility and environmental assessment of the proposed Broad Oak reservoir, jointly commissioned by the Council and the Environment Agency, to confirm its deliverability and compliance with the Habitats Regulations. Until this evidence is published, the Plan should not rely on the reservoir as mitigation for potable water or wastewater capacity within the HRA.



Q45: Sustainability Appraisal of the Draft Local Plan (Regulation 18 Focused Consultation)

Summary Response

The Canterbury Society welcomes the publication of the August 2025 Sustainability Appraisal (SA) and supports the principle of evidence-led plan-making. However, the appraisal as drafted falls short of what is needed to demonstrate legal compliance or strategic coherence.

It lacks transparency in method, consistency in site assessment, and integration with the Local Plan's policies. The treatment of alternatives is especially weak, mitigation measures are described without enforceable delivery mechanisms, and several assessments appear inconsistent with the Council's own adopted strategies.

Unless strengthened, the SA undermines both public trust and the soundness of the draft Local Plan.

Key Issues / Justification

1. Site Assessment Methodology

The reliability of the SA's site-level assessments is questionable. Appendix G presents results that do not align with the Council's own baseline evidence. For example, Thanington Recreation Ground (N3) is scored as neutral or even positive for green infrastructure and public health, despite being identified in the Playing Pitch Strategy and the Green Infrastructure Strategy as a critical piece of neighbourhood-scale open space. This disconnect suggests that scoring has been applied generically rather than grounded in site-specific data, creating a risk of rationalising allocations rather than objectively testing them.

2. Missing Spatial Strategy Alternatives

The spatial strategy options modelled in Appendix F are narrow in scope, each representing variations on greenfield-led edge expansion. The appraisal does not test a compact city or brownfield-first scenario, despite the clear policy direction in the NPPF to prioritise efficient land use and well-served sustainable locations. By excluding an urban regeneration and infrastructure-first option, the SA fails to satisfy the SEA Regulations' requirement to consider "reasonable alternatives." This omission weakens the Plan's justification for its chosen growth pattern and leaves it vulnerable at Examination.

3. Mitigation Dependencies without Delivery Mechanisms

Many policies are scored as sustainable on the assumption that mitigation will be provided later, at project level. Appendix I frequently records neutral or positive scores where impacts would only be offset if future measures (such as nutrient neutrality solutions for Stodmarsh or ambitious modal shift programmes) were successfully implemented. Yet these mechanisms are not embedded in the Plan, nor backed by phasing triggers, thresholds, or secured funding. By treating uncertain mitigation as guaranteed, the appraisal fails to uphold the precautionary principle and creates a disconnect between SA optimism and delivery reality.



4. Generalised and Non-Spatial Baseline Data

The environmental baseline in Appendix D is neither current nor spatially modelled. Important indicators (such as flood risk, air quality, green infrastructure corridors, and climate resilience) are either generalised or not mapped in a way that shows cumulative impacts across the city. This weakens the SA's ability to identify settlement-level vulnerabilities, inform cross-boundary policy, or support site prioritisation.

The Sustainability Appraisal does not evidence a genuine alternatives-testing exercise. Each scenario represents a variation of edge expansion rather than a substantively different strategy. This contrasts with the approach of other authorities, such as West Suffolk, which explicitly test infrastructure-first and compact-growth options.”

5. Transport and traffic modelling gap

The KCC Transport Modelling Report confirms that the modelling undertaken to date remains a fixed-demand, highway-only assessment based on 2019 baseline conditions.

It explicitly acknowledges that the model cannot quantify mode shift from car to sustainable transport and that public transport, walking, and cycling are not modelled explicitly. Although five broad network options were tested, none were supported by behavioural or variable-demand modelling, and the report itself recommends further work to develop a Variable Demand Model and undertake sensitivity testing for post-COVID travel patterns.

While the 2021 represents a useful interim step, it does not provide the multimodal evidence Kent County Council Highways requested in 2024.

The Regulation 18 Sustainability Appraisal therefore continues to rely on untested modal-shift assumptions and lacks a validated forecast of how the Local Plan's growth would affect network capacity or congestion

Until that work is completed and released, the Plan's transport sustainability and SA conclusions remain unsubstantiated.

6. Public Engagement Not Reflected in SA Outcomes

Appendix B summarises public feedback but gives no evidence that concerns have influenced appraisal outcomes. Strong objections around infrastructure capacity, the loss of greenfield land, and the need for stronger climate action are acknowledged in narrative form but do not lead to changes in scoring or alternative modelling. This lack of a feedback loop between engagement and evidence undermines public confidence and contradicts the participatory intent of the SA process.

Supporting Evidence and Sources

- [SEA Regulations 2004 \(Regulation 12\)](#) – requirement to assess reasonable alternatives
- CCC Sustainability Appraisal (2025): Appendices [B](#), [D](#), [F](#), [G](#), [I](#)
- [Kent Countywide Transport Modelling Report](#)
- [KCC Reg 18 Response \(2024\)](#) - relating to Transport and Traffic Modelling

Appendix B: Responses to Consultation Questions

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- [CCC Playing Pitch Strategy \(2020\)](#) and [Green Infrastructure Strategy \(2018–31\)](#) & [Baseline Evidence](#)
- [NPPF \(2024\)](#)

Recommended Changes

Q45-R1 Reappraise site assessments with transparent, site-specific evidence and publish rationale notes.

Q45-R2 Introduce a compact city / brownfield-first option into spatial strategy testing.

Q45-R3 Embed mitigation measures into policy wording with clear phasing triggers.

Q45-R4 Update and spatialise baseline data to capture cumulative impacts.

Q45-R5 Strengthen the link between public feedback and appraisal scoring to demonstrate responsive plan-making.

Q45-R6 Publish updated, multimodal transport modelling (incorporating all current allocations, mode-shift assumptions, and variable-demand testing) before Regulation 19.



Q46: Sustainability Appraisal of the Strategic Land Availability Assessment (SLAA)

Summary Response

The Canterbury Society is concerned that the Sustainability Appraisal (SA) of the Strategic Land Availability Assessment (SLAA) has not functioned as a meaningful tool for filtering sites or testing alternatives. While the SLAA is not a mechanism for allocating land directly, the associated SA should play a critical role in identifying unsuitable sites, guiding spatial strategy choices, and shaping a more sustainable development pattern. At present, however, the SA appears to be used retrospectively to justify site inclusion, rather than proactively to test environmental and social constraints. This undermines confidence in the process and may compromise the legal robustness of the Local Plan.

Key Issues / Justification

1. Absence of Exclusion Thresholds or Red Flag Criteria

The SA is intended to identify the environmental, social, and infrastructure risks associated with potential development sites. Yet many sites with significant unresolved constraints (such as high flood risk, inadequate access, or known ecological value) remain in the Plan. There is no published threshold or red flag scoring to indicate that a site is unsustainable or should be excluded. In areas like Thanington and Blean, for example, multiple sites are taken forward despite cumulative pressure on infrastructure, green space, and transport. Without transparent criteria to rule out high-risk sites, the SA fails to perform a strategic filtering role.

2. Inconsistent or Unjustified Scoring Across Comparable Sites

The SA's scoring matrix shows discrepancies in how similar site types are assessed. Some sites offering valuable community or ecological functions are scored as neutral or even positive, despite evidence to the contrary.

Site N3 (Thanington Rec) is a notable example: scored positively on green infrastructure and public health, despite being one of the few formal recreation spaces in a high-deprivation ward. This conflicts directly with the Council's Playing Pitch Strategy and Green Infrastructure Strategy.

By contrast, less active or ecologically rich sites are sometimes scored more negatively. The lack of commentary or transparent rationale for scoring decisions creates an impression of arbitrary or post-hoc justification.

3. Lack of Alternatives or Trade-Off Testing

The SA does not appear to model alternative site groupings or evaluate the cumulative sustainability of different development packages. There is no scenario planning that weighs a brownfield-first option against edge-of-settlement greenfield expansion, nor any indication of what alternatives were considered if contentious sites such as N3 were ruled out. Without this level of comparative testing, the SA falls short of legal expectations under the SEA Regulations, which require assessment of



“reasonable alternatives”. The absence of spatial trade-off modelling also reduces transparency for communities seeking to understand the rationale behind site selection.

Supporting Evidence and Sources

- [Strategic Land Availability Assessment \(SLAA, 2025\)](#)
- Sustainability Appraisal [Appendices G](#) and [D](#)
- [Playing Pitch Strategy \(2020\)](#)
- [Green Infrastructure Strategy \(2018–31\)](#)
- [SEA Regulations 2004](#) (Environmental Assessment of Plans and Programmes Regulations)

Recommended Changes

- Q46-R1** Publish clear SA-based exclusion criteria (e.g. flood risk, GI loss, unresolved access) and apply them consistently to all SLAA sites.
- Q46-R2** Introduce spatial alternatives modelling ahead of Regulation 19, including brownfield-led and infrastructure-first packages.
- Q46-R3** Produce a site selection narrative explaining inclusion/exclusion decisions, and publish an SA risk map showing cumulative sustainability pressures.