

Canterbury City Council Offices  
Military Road  
Canterbury  
CT1 1YW

VIA EMAIL: [consultations@canterbury.gov.uk](mailto:consultations@canterbury.gov.uk)

One Chapel Place  
London  
W1G 0BG

Your ref: Aylesham South  
Our ref: Aylesham South

20 October 2025

Dear Sir / Madam,

## **CANTERBURY DISTRICT LOCAL PLAN REGULATION 18 FOCUSED CONSULTATION (SEPTEMBER 2025) – AYLESHAM SOUTH**

On behalf of the Trustees of the Lord Fitzwalter 1988 Settlement, Carter Jonas (CJ) have pleasure in enclosing our representation to the Regulation 18 'Focused Consultation' of Canterbury District Local Plan (the draft Local Plan) which is currently being undertaken by Canterbury City Council (the Council).

These representations relate to **Aylesham South** (the Site).

### **THE OPPORTUNITY**

The existing settlement of Aylesham is located within the administrative area of Dover District Council. The adopted Dover District Local Plan to 2040 identifies Aylesham as a rural service centre where there are a range of community facilities including a post office, pharmacy, health centre, primary schools, rail station and shops selling convenience goods. The settlement is not located in the metropolitan Green Belt, nor is it situated within the National Landscapes (AONB) and is free from flooding or flood risk.

The adopted Local Plan in Dover includes an allocation at 'Land to the South of Aylesham' (Policy SAP24) to create a new neighbourhood with community facilities as well as formal and informal open space. The inclusion of a major allocation at Aylesham within the Dover Local Plan indicates that Aylesham is regarded as an area suitable for sustainable development growth. An outline application for up to 800 new homes on this site was submitted to Dover District Council in February 2025 (Dover application reference: 25/00133) and is currently under determination. This should be determined prior to the forthcoming Regulation 19 consultation on the Canterbury City Council Local Plan.

On the basis of the above, the former draft Aylesham South allocation in Canterbury (R20) represents a logical location and opportunity for housing delivery in Canterbury District. Aylesham South is a large site which adjoins the existing settlement boundary in Dover in a sustainable location with access to a wide range of facilities, services and public transport options and has relatively few constraints in terms of topography, landscape, heritage, ecology and views (see Figure 1). In combination with the future development at Aylesham South in Dover which is now subject to an allocation and an outline planning application, the sites combined have the potential to create a Sustainable Urban Extension to Aylesham.



Figure 1 - Draft Masterplan illustrating adjacent land South of Aylesham which is allocated in Dover District Council's adopted Local Plan.

## LOCAL PLAN REGULATION 18 REPRESENTATIONS 2025

The Council has invited comments on the Draft Local Plan, and our response is set out below and structured by reference to the consultation questions.

The decision to proceed with the production of an updated Local Plan is supported in principle. The importance of creating a Plan-led approach to planning for development in Canterbury will ensure that the future needs of residents and businesses in the area can be met through the sustainable development of sites.

## Aligning the Local Plan with new NPPF requirements

### Housing Requirement

We are supportive of the Council's decision for making provision for meeting the identified Local Housing Needs ('LHN') figure of 1,215 homes per year, however, it should be noted that the LHN figure is a minimum annual housing need figure, rather than a total quantum that the Plan should provide for.

Paragraph 11b of the NPPF makes clear that *"strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas."*

The requirement to set the housing target over the LHN figure is particularly significant in the context of Canterbury's persistent record of under delivery, failing to deliver more than 87% against its Housing Delivery Test ('HDT') target over the past 5 years since 2019<sup>1</sup>, with its average HDT performance no more than 76%. Canterbury is currently unable to demonstrate a sufficient five year supply of housing land, with the latest position standing at 4.16 years. As such, it is imperative to secure an appropriate buffer above the minimum target to ensure sufficient flexibility in delivery pipeline to overcome any delay when developments are carried forward.

The thrust for a higher provision than the identified housing needs is supported not only by the Government's ambition to *"significantly boosting the supply of homes"* under paragraph 61 of the NPPF to deliver 1.5m homes, but also by the PPG guidance (Paragraph: 040 Reference ID: 2a-040-20241212), which states that:

*"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations."*

In the pro-growth policy context, we do not consider there is a robust position for the Sustainability Appraisal ('SA', 2025) to discount two growth options (with either 10% or 20% uplift<sup>2</sup>).

Paragraph 5.2.20 of the SA states *"There is currently no robust evidence to justify planning for an alternative higher figure as a plan requirement and include a 10% or 20% uplift to the mandatory standard method figure as proposed under the alternative options. The level of growth required under the standard methodology will help facilitate affordable housing, infrastructure and employment growth and provide a substantial uplift on recent housing completions in the district"*.

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<sup>1</sup> 2023: 67%

2022: 75%

2021: 65%

2020: 87%

2019: 87%

<sup>2</sup> Section 5.2 of the SA.

We do not consider the above approach is fully reflective of the spirit of the guidance as the PPG makes it clear that “Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.”

On the contrary, a target above the LHN figure is fully justified by the Council’s evidence base as it has been demonstrated that the delivery of 1,215 dpa will still be far from meeting the identified affordable housing needs. The Canterbury Housing Needs Update (July 2025) indicates an annual affordable housing need of approximately 695 units will be required to meet the affordable housing requirements for the District. Applying the current 30% affordable housing level, it will require the delivery of 2,316 dwellings per annum in order to meet this identified affordable housing need (i.e. 2,316 dwellings x 30% = 695 dwellings).

In this regard, we are concerned that the current proposed target of 1,215 dpa would only be capable of delivering no more than 52% of the required need (i.e. 1,215 dpa x 30% = 365 affordable homes, which is approximately half of the identified affordable housing need).

As such, we would support a substantial uplift above the current housing requirement figure, in order to at least maximise the opportunities to meet the identified affordable housing need.

### Housing Trajectory

Table 7.3 of the Focused Regulation 18 Topic Paper (August 2025) provides the following housing trajectory of the draft allocations and committed developments.

While the current trajectory indicates the projected supply will be capable of meeting the annualised housing target of 1,215 homes, we are concerned by the lack of sufficient allocations from Year 13 (2039/40) onwards, with the projected supply falling sharply below the housing target.

Furthermore, we are concerned that the draft Plan relies on windfall sites in meeting its required housing needs, which constitute approximately 12% of the housing targets (2,599 windfall over 21,870 homes), which is not fully evidenced.

It is our view that, instead of reliance on separate windfall applications to come forward in dispersed locations, we consider it appropriate to allocate further sites which are likely to deliver improvements to infrastructure and high quality masterplanning to ensure the robustness of the Plan-led system.

Table 7.3: Summary table of housing land supply

Components of Housing Land Supply	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	Total No. of units
2017 carried forward Allocations	631	928	961	1,023	942	1,015	865	791	633	513	420	380	380	360	340	354	50	0	10,586
Draft New Allocations	30	36	0	20	79	282	661	1,067	1,171	980	827	800	730	730	649	530	410	128	9,130 <sup>14</sup>
Planning Permissions	214	99	69	190	185	150	90	0	0	0	0	0	0	0	0	0	0	0	997
Windfall			49 <sup>15</sup>	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	2,599
Student permissions	55	103	317	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	475
Older persons permissions	105	101	0	42	0	44	0	0	0	0	0	0	0	0	0	0	0	0	248
Draft New Allocations for older persons homes	0	0	0	0	0	16	21	16	178	102	0	0	16	21	0	0	0	0	369
<b>Total</b>	<b>1,035</b>	<b>1,267</b>	<b>1,396</b>	<b>1,445</b>	<b>1,376</b>	<b>1,633</b>	<b>1,807</b>	<b>2,044</b>	<b>2,152</b>	<b>1,765</b>	<b>1,417</b>	<b>1,350</b>	<b>1,296</b>	<b>1,281</b>	<b>1,159</b>	<b>1,054</b>	<b>630</b>	<b>298</b>	<b>24,406</b>

Figure 1 – Housing Trajectory (Focused Regulation 18 Topic Paper, page 84)

## Draft Local Plan policies for consultation - District-wide Strategic

### Spatial Strategy

The following Spatial Strategy options are considered in the SA:

- Canterbury Focus
- Canterbury Focus with new settlement
- Coastal Focus
- Rural Focus
- New freestanding settlement

We note the Council's decision to move away from the previously preferred 'Canterbury Focus with New Settlement' option consulted upon at Regulation 18 stage, in favour of a 'Canterbury Focus' approach. We are concerned that the reasons for this change have not been clearly articulated, in particular when table 5.6 of the Sustainability Appraisal indicates that both options perform at a broadly similar level, and in this context, the evidential basis for preferring the Canterbury Focus approach has not been fully demonstrated.

We understand that the previously preferred 'Canterbury Focus with New Settlement' option was discounted on the basis that, following the removal of the draft new settlement to the north of the University of Kent, there were considered to be no "*sites or group of sites that are suitable, available and achievable to deliver a new freestanding settlement.*"

We are concerned that the emphasis on concentrating the majority of growth within Canterbury, Whitstable and Herne Bay urban areas may not achieve a balanced spatial distribution of development across the District. This approach appears difficult to reconcile with paragraph 11(a) of the NPPF, which requires that "*all plans should promote a sustainable pattern of development.*"

A similar challenge will arise in meeting one of the SA's Objectives (Objective 12), which is "*To achieve a strong and sustainable economy, and revitalise town, local and rural centres.*" By concentrating growth predominantly within established urban areas, the current preferred approach risks falling short of delivering the revitalisation of local and rural centres envisaged by Objective 12.

As such, we would recommend the preferred Spatial Strategy option should be revised to:

*"Canterbury Focus **with new settlements or urban extensions**"*

The former R20 allocation at Aylesham South included 420 new homes, this in combination with the adjoining site allocation in Dover for up to 800 homes has the potential to create a Sustainable Urban Extension at Aylesham South with a total of c. 1,220 new homes.

### Draft Local Plan policies for consultation - Rural area

While this section primarily focuses on the draft four allocations (one of which is non-residential) in rural areas, we are of the view that additional sites in rural areas should be allocated, in particular those already immediately adjoining existing settlements such as land south of Aylesham, in order to achieve the Plan's district spatial growth strategy "*proportionate development will be allocated at Rural Service Centres at a suitable scale which supports the function and character of the settlement.*"

This is particularly significant in circumstances where both the adopted Local Plan and the current draft Plan concentrate allocations predominantly in the rural areas to the north and centre of the District, which will lead to an imbalanced distribution of growth, in particular in the south of the District (as shown in **Appendix 1**).

From a spatial perspective, this represents a significant narrowing of the growth pattern in the rural area and falls short of achieving "*proportionate development*" across the network of Rural Service Centres in a genuine sense.

We therefore support the inclusion of further rural allocations particularly those in sustainable locations adjoining existing settlements, such as land south of Aylesham to ensure the spatial strategy is robustly and consistently applied across the District.

### **New Draft Site Allocation Policies**

It is noted that the former draft site allocations at the land to the North of the University of Kent (C12) and land to the North of Hollow Lane (C7) have been replaced by 29 new smaller residential site allocations in the current draft version of the Local Plan.

Whilst we do not object to the specifics of any of the smaller site allocations, we would comment that there are no new allocations which would deliver over 200 dwellings. This is shown in **Appendix 2** which compares previous Regulation 18 consultation allocations with this consultation. Clearly there is an added element of risk in terms of a larger number of sites coming forward during the plan period, as these will all be in different ownerships. The Aylesham South site (R20) could deliver 420 dwellings in a single allocation and should be added to the list of draft allocations to try and remove some of the risk associated with a large number of smaller allocations and a large number of windfall sites which make up the housing trajectory in this consultation.

### **Sustainability Appraisal and Strategic Land Availability Assessment**

The Strategic Land Availability Assessment (SLAA) identifies Aylesham South at Site Reference SLAA180 on pages 183 and 184 of the SLAA 'Summary of Site Submissions' document. The plan shown for SLAA180 outlines the entire ownership of the landowner, which includes a large portion of the site which is located within Dover District Council's administrative area. This is misleading and should be updated.

The 'Local Plan Status 2025' box explains that site SLAA180 had a draft allocation in the 2022 Local Plan Regulation 18 consultation for 420 dwellings. This was removed in the 2024 consultation as objections were raised by KCC highways in terms of impact on the highways network *"in particular on routes north and east of Adisham where trips are likely to occur to access Thanet and Dover, and the suitability of the junction at Wingham to accommodate an increased level of traffic arising from large-scale development in the area"*. Concerns were also raised by Natural England and Kent Downs AONB Unit over *"the impact of development on the landscape and setting of the AONB. Dover District Council also objected due to concern regarding the impact on the setting and character of Aylesham"*.

The 'Local Plan Status 2025' box goes on to note that the evidence submitted on behalf of the landowner as part of the 2024 consultation, which included comments from Kent Downs National Landscape, means landscape is no longer considered a reason for unsuitability. The adoption of the Dover District Local Plan in the meantime has also allocated land to the north of the site for development and it is therefore considered there are ways to overcome previous concerns through design.

We also submitted highways evidence as part of the 2024 consultation which does not appear to have been accepted by KCC Highways. It is unclear what the remaining highways issues are. This topic is covered in more detail in the following section.

In terms of the sustainability appraisal, a comparison of the scoring within the 2022 version (where the site had a draft allocation) and the latest 2025 update is provided below:

Ref	Site Name	Version	1. AQMA	3. Biodiversity Overall	4. Geology Overall	5. Landscape	6. Water Overall	7. Flooding	9. Historic environment Overall	10. Dwellings	11. Land Use	12. Employment Overall	13. Transport Overall	14. Sustainable communities Overall
SLAA180	Aylesham South	2022 Scoring	0	--	0	--	-	++	--	++	--	0	++ / --	++ / -
SLAA180	Aylesham South	2025 Scoring	0	--	0	--	-	--	--	++	--	0	++ / --	++ / -

We have concerns in relation to the accuracy of the relevant assessment, which will require further amendments in light of the clarifications set out below:

Generally

Whilst the previously identified landscape issues are no longer considered to be a reason for unsuitability due to evidence submitted and changes which are taking place in Dover’s administrative area, the SLAA assessment for this site does not appear to have been updated to reflect this. This is clear in Appendix C of the Housing Topic Paper 2025. Given the comments on landscape referred to above, the site still has many red cells in the SLAA on topics such as flooding, heritage, land use and also landscape. It therefore appears that the SLAA has not been updated to reflect the fact that landscape is no longer considered an issue.

Flooding

Flooding on this site was previously considered green in 2022. The site remains in Flood Zone 1 with very limited pockets of surface water flooding (mainly in the 1,1000 annual range) which would be excluded from any development areas (as shown in Figure 2), however the site has a red designation for flooding in the 2025 SLAA. It is unclear why the site is red for flooding.



Figure 2 – Concept Master overlaid with EA’s Risk of Flooding from Surface Water mapping

### Biodiversity

On the aforementioned planning application in Dover, on site Biodiversity Net Gain of 44% and 64% in hedgerows has been demonstrated against a requirement for 10%. Therefore, the red status for Biodiversity also appears to be inaccurate as the site has the potential to provide significant increases in biodiversity as demonstrated on the wider site in Dover.

If the SLAA had been updated for Aylesham South, it would have many fewer red cells and would appear to be more suitable than many of the new site allocations, which are not without their constraints or red cells.

### Highways

As referenced in the previous section, the SLAA 'Summary of Site Submissions' document states in the Local Plan Status 2025 box for Site SLAA180 that KCC concerns on the impact of development on the site on the highways network are "*in particular on routes north and east of Adisham where trips are likely to occur to access Thanet and Dover, and the suitability of the junction at Wingham to accommodate an increased level of traffic arising from large-scale development in the area*".

An outline planning application (reference 25/00133) was submitted to Dover District Council in February 2025 on the wider Aylesham South site which lies within Dover District's administrative area. This has largely dealt with this concern from KCC and demonstrates that the immediate and wider highways network can accommodate the additional development in Aylesham as well as proposing various mitigation measures which development on this site would benefit from.

The initial formal response to the application issued by KCC highways is available on Dover District Council's website and is appended to these representations at **Appendix 3**. On Page 5 of these comments under 'Highway and Transport Impacts' the comments on the A257 Canterbury Road/B2046 Wingham High Street Junction note that "*Previous Technical assessment of this junction has determined that little can be done to improve capacity due to space constraints. The proposed development has been modelled to add 49 vehicle movements through this junction in the AM peak and 53 in the PM peak, or 1 additional vehicle every 72 seconds on average, either routing from the A257 to the B2046 or vice versa. Recent traffic data collected from this junction indicates that baseline flows have decreased and a position was taken at the site selection stage that further development in Aylesham could feasibly support a tangible improvement in bus service provision for journeys routing in this direction, to offset its own impact and trips from elsewhere in Aylesham and along this corridor, thus helping to mitigate impacts at this junction*". Therefore, it is acknowledged by KCC that the Wingham junction is no longer under as much pressure from traffic flows and that improvements to bus services to serve the wider area will help offset and mitigate impacts.

In this regard, discussions are well advanced with KCC Highways and Stagecoach, the operators of Bus route 89 which currently runs between Canterbury and Aylesham. The discussions include the potential to extend the existing 89 service to north to Wingham and further to Sandwich. The Aylesham South development at Dover would be required to contribute to the extension of this service and therefore this infrastructure would be in place should the Aylesham South site in Dover be brought forward for development. This application should have a resolution at committee in advance of the next round of consultation on the Canterbury Local Plan.

A full Transport Assessment was submitted with application reference 25/00133 in Dover for the wider Aylesham South site. This proposes / confirms the following in terms of the local highways network:

- a) The site benefits from being accessible on foot, by cycle and by public transport which provide a reasonable level of connectivity with a range of local and regional destinations as well as being accessible on foot and by Cycle to Aylesham village centre.

- b) The results of ATCs reveal actual speeds of vehicles along Adisham Road, Spinney Lane and Aylesham Road are well below the national speed limit (85<sup>th</sup> percentile). As a result, reduced speed limits are being introduced including 50mph on Adisham Road, 30mph on Cooting Road, 30mph on Spinney Lane from the Adisham Road junction to east of Cooting Road junction. 50 mph on the remainder of Spinney Lane and 40mph on Aylesham Road. The 30 mph limit on Spinney Lane between the Adisham Road junction to east of Cooting Road will directly benefit the site in question as this is the northern perimeter of the site. The other wider speed reductions will also help create a residential feel in the area. These revised speed limits are shown on drawing 22- 221-SK-170 F submitted with Dover application reference: 25/00133.
- c) Improvements to the design of the Adisham Road/Spinney Lane junction to increase inter-visibility.
- d) Walking and cycle routes are proposed to be improved.
- e) The existing 89 bus service is proposed to be increased in frequency or extended as already discussed.

Clearly significant work has already been undertaken on behalf of the landowner in respect of the Dover element of Aylesham South. This demonstrates that Aylesham has the infrastructure to accommodate major development and clearly this is planned to be further enhanced to mitigate the impact on certain elements of the highways network. Any application on the Aylesham South site in Canterbury would benefit from this improved infrastructure and this should also remove some of the previous highways concerns associated with the site.

The Dover application should have a resolution at committee in advance of the next round of consultation on the Canterbury Local Plan. The former draft R20 allocation in Canterbury is clearly adjacent to a future development site making it more sustainable and an entirely logical location for future development.

Furthermore, it is noted that the current consultation proposes the allocation of Barham Layby (Site N34) as a lorry rest area for up to 20 HGVs. This is to the south southwest of the site on the A2. Clearly the infrastructure is considered to exist on the local highways network to accommodate such an allocation, which could also support R20 being reintroduced as an allocation in the next round of consultation on the Local Plan.

Given the above, it is clear that the Sustainability Appraisal requires updating.

### **Summary**

The decision to proceed with the production of an updated Local Plan is supported in principle. To support and enhance the Council's Vision to provide affordable high-quality housing and create a thriving economy, it is imperative that the Council should further allocate well-located and accessible new residential sites to meet identified need. It is considered that the former Aylesham South allocation (R20) could help with alleviating a number of issues we have identified as part of this consultation process.

Whilst the government's LHN figures can technically be met, the LHN figures should be seen as minimums and the inclusion of other deliverable and achievable sites should be considered where they are available. This is particularly important in circumstances where Councils have not been delivering their HDT targets. This has been an issue for Canterbury over the last five years where the HDT have not been met and the Council cannot demonstrate a 5YHLS. Furthermore, the affordable housing requirements have also not been met.

In terms of housing trajectory, there is an expectation that 12% of the Local Plan's housing requirements will be delivered via windfall sites. This figure could be reduced further if available and deliverable sites could be identified and it reduces the risk factor in terms of housing delivery.

The consultation materials demonstrate that there are very few allocations which would contribute to the growth of rural centres. Aylesham South is within an identified rural centre and could assist with creating a balance of development across the Council's administrative area.

The removal of the major urban extensions/large allocations as part of this consultation has been replaced with 29 new smaller allocations. This introduces a further element of risk in terms of trajectory and when these sites may be delivered. The addition of a larger deliverable and achievable site would help provide a buffer in circumstances where some of these sites may not be delivered and there is already a reliance on windfall development.

The former R20 allocation could assist with reducing the risk factor on all of these points.

In terms of how the Aylesham South site has been considered specifically as an omission site, the sustainability appraisal does not appear to have been updated to reflect the fact that the previously identified landscaping issues on site have now fallen away. Many cells in the sustainability appraisal appear red which should have been updated.

Furthermore, the confirmation of the wider Aylesham South site which lies within Dover District Council as a major allocation in Dover should also be considered as part of Canterbury's Local Plan process. The outline application which is now under consideration on the Aylesham South site in Dover has the potential to deliver up to 800 homes and a range of infrastructure improvements which will likely address the previous objection from KCC on R20.

The site offers an excellent opportunity to deliver a high-quality residential scheme, which would make a meaningful contribution towards housing need in the District. It is envisaged that only part of the wider site is being promoted for residential development with the remainder of the site being retained as open space. This will benefit future residents as well as existing residents by providing a useable form of open space. In combination with Dover's adopted Local Plan SAP24 at Aylesham South (and the outline planning application being considered on this site), the two sites have the potential to deliver a Sustainable Urban Extension to the south of Aylesham.

Without major constraints impacting the wider area, the Site is capable of delivering a significant number of consequential benefits to the area. It is considered a sustainable location which will also benefit from the synergy effect in terms of highways improvements and community facilities which are coming forward as a result of the adjoining allocation/application.

We would be grateful if you could confirm receipt of these representations and keep us informed on the progress of the production of the Local Plan.

If you have any queries on any points covered in this submission, please do not hesitate to contact me or my colleague [REDACTED]

Yours faithfully

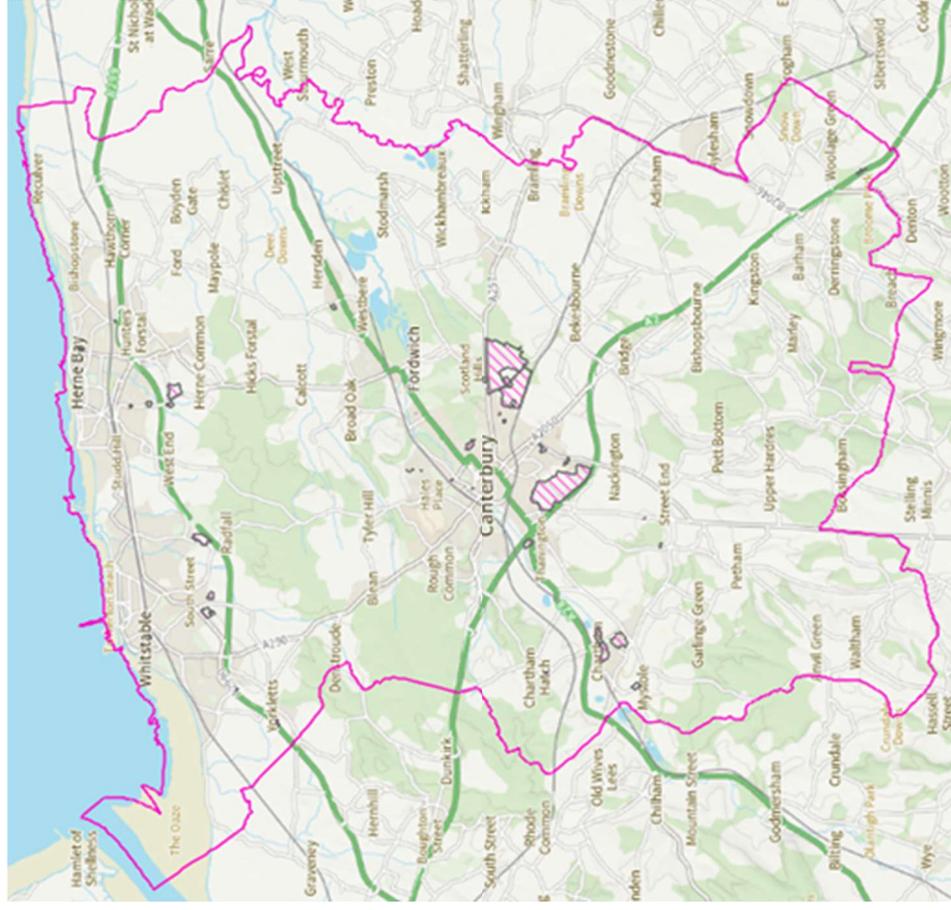
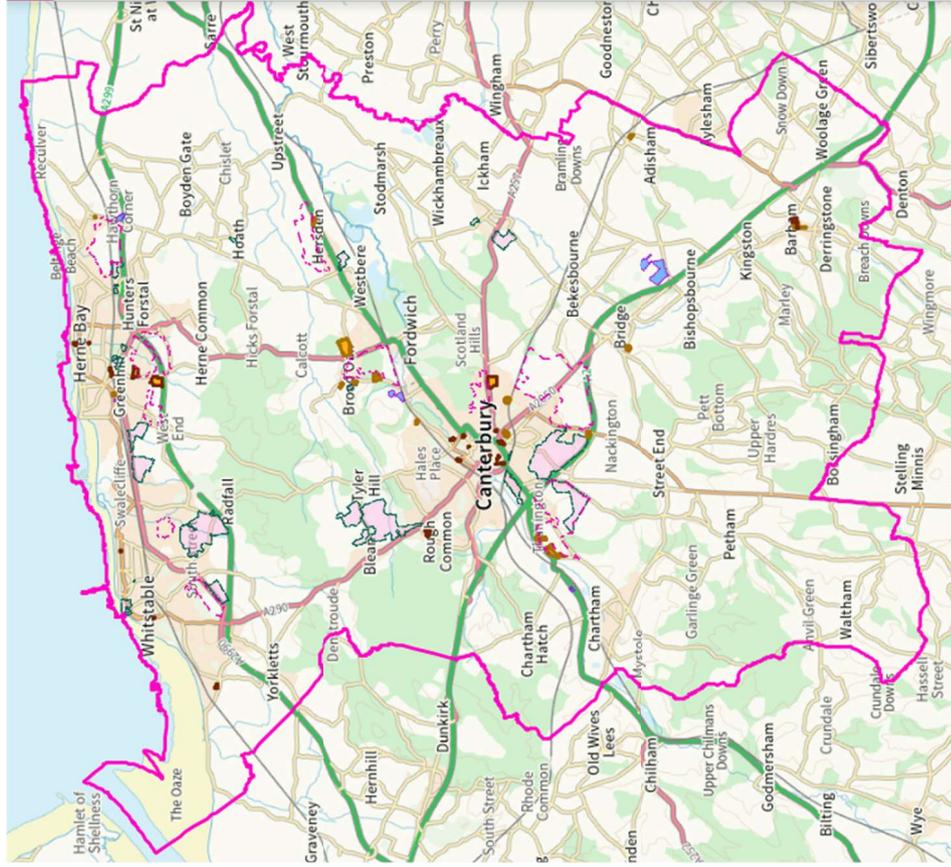
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**Jessica McSweeney**  
Partner

[REDACTED]

## Appendix 1 – Location of Adopted and Draft Allocations

Locations of Allocated Sites within the Adopted and 2024 Draft Plans (left) and New Allocations in the 2025 Plan (right) (Note: Some of 2024 allocations are now omitted)



## Appendix 2 – Comparison Table of Draft Allocations

This section compares the proposed draft allocations of the Council's previous draft Local Plan Regulation 18 consultations (October 2022 and March 2024) and the current Regulation 18 consultation (October 2025).

	Allocation	2022 Plan	2024 Plan	2025 Plan	Change since 2024	Note
	<b>Canterbury</b>					
C2	43 to 45 St George's Place	50	50	50	0	No change
C8	Nackington Police Station	0	20	20	0	No change
C9	Milton Manor House	95	95	95	0	No change
C10	Land to North of Cockering Road	36	36	36	0	No change
C13	Becket House	67	67	67	0	No change
C14	Land at Station Road East	37	37	37	0	No change
C15	Land at the former Chaucer Technology School	70	70	70	0	No change
C16	Land at Folly Farm	17	17	17	0	No change
C19	Wincheap commercial area	300	1000	1000	0	No change
C12	Land north of the University of Kent	0	2000	0	-2000	Removed
C7	Land to the North of Hollow Lane	735	800	0	-800	Removed
N/A	Canterbury Golf Course	74	0	0	0	No change
N1	Land at Merton Park	2075	2250	1930	-320	Reduced quantum
N2	Land at Langton Lane	0	0	14	14	New allocation in 2025
N4	Land south of Littlebourne Road	1400	0	1520	1520	Allocated in 2022, removed in 2024, reallocated in 2025
N5	Land south of Bekesbourne Lane	645	0	860	860	Allocated in 2022, removed in 2024, reallocated in 2025
N6	Land north of Bekesbourne Lane at Hoath Farm (removed)	67	0	67	67	Allocated in 2022, removed in 2024, reallocated in 2025
N7	Land at Seotamot	0	0	14	14	New allocation in 2025
N8	Millers Field car park	0	0	9	9	New allocation in 2025

N9	Land at Hawk's Lane	0	0	12	12	New allocation in 2025
N10	Land at Military Road	0	0	180	180	New allocation in 2025
N11	Land at Long Meadow Way	0	0	5	5	New allocation in 2025
N12	Land at Bawden Close	0	0	5	5	New allocation in 2025
N13	Land at Copinger Close	0	0	6	6	New allocation in 2025
N14	Land at Jesuit Close	0	0	6	6	New allocation in 2025
N15	Land at Suffolk Road	0	0	5	5	New allocation in 2025
N16	Land at St Stephen's Road	0	0	18	18	New allocation in 2025
N17	Land at Whitehall Close	0	0	7	7	New allocation in 2025
N18	Land at Sussex Avenue (Spring Lane Centre)	0	0	21	21	New allocation in 2025
	Whitstable					
W4	Land at Brooklands Farm	1300	1400	1400	0	No change
W5	Land south of Thanet Way	270	220	220	0	No change
W6	Bodkin Farm	250	250	250	0	No change
W7	St Vincent's Centre	10	10	10	0	No change
N20	Land east of Chestfield Road	0	0	150	150	New allocation in 2025
N21	Land at Golden Hill	120	0	70	70	Allocated in 2022, removed in 2024, reallocated in 2025
N22	Land at Beresford Road	0	0	6	6	New allocation in 2025
N/A	37 Kingsdown Park	7	0	0	0	No change
	Herne Bay					
HB4	Land to the west of Thornden Wood Road	150	150	150	0	No change
HB5	Land comprising nursery industrial units and former Kent Ambulance Station	14	14	14	0	No change
HB8	Altira	70	67	67	0	No change
HB9	Former metric site	12	9	9	0	No change
N25	Moyne	0	0	24	24	New allocation in 2025
N26	Land at Beacon Road	0	0	32	32	New allocation in 2025

N27	Former Herne Bay Driving Range	0	0	10	10	New allocation in 2025
N28	Land to the east of Bullockstone Road	0	0	35	35	New allocation in 2025
N29	Land at Home Farm, Strode Park	0	0	200	200	New allocation in 2025
N30	Land to the west of Bullockstone Road	0	0	50	50	New allocation in 2025
	Rural areas					
R2	Great Pett Farmyard	13	13	9	-4	Reduced quantum
R5	Bread and Cheese Field	150	150	150	0	No change
R6	Land at Hersden	18	18	18	0	No change
N31	Chartham Paper Mill	0	0	165	165	New allocation in 2025
N32	Land at Rattington Street, Chartham	170	0	170	170	Allocated in 2022, removed in 2024, reallocated in 2025
N33	Land at former Spires Academy, Hersden	0	0	38	38	New allocation in 2025
N/A	Land at Cooting Farm	3200	0	0	0	No change
N/A	Land at Mill Field	36	0	0	0	No change
	Littlebourne					
R7	The Hill, Littlebourne	300	300	300	0	No change
R8	Land north of Court Hill	50	50	50	0	No change
	Sturry					
R9	Land north of Popes Lane	110	110	110	0	No change
R10	Land at The Paddocks, Shalloak Road	50	50	50	0	No change
	Aylesham					
	Aylesham south	420	0	0	0	No further allocation since removal of Aylesham South (420 homes)
	Adisham					
R12	Land west of Cooting Lane and south of Station Road	10	10	10	0	No change
	Barham					
R13	Land adjacent to Valley Road	9	20	20	0	No change
	Broad Oak					
R14	Land at Goose Farm, Shalloak Road	26	26	26	0	No change

R15	Land at Shalloak Road (new allocation)	0	12	10	-2	Reduced quantum
R16	Land fronting Mayton Lane	8	8	8	0	No change
	Hoath					
R18	Land at Church Farm	17	17	17	0	No change
	<b>Total</b>	12458	9346	9919	573	

**Appendix 3 – Representations from KCC Highways to the Aylesham South planning application in Dover District Council (application reference: 25/00133)**



**Dover District Council**  
White Cliffs Business Park  
Dover  
Kent  
CT16 3PJ

**Highways and Transportation**  
Kroner House  
Eurogate Business Park  
Ashford  
TN24 8XU  
**Tel:** 03000 418181  
**Date:** 8 April 2025  
**Our Ref:** MB

**Application - DOV/25/00133**

**Location - Land West Of Aylesham Road And South Of, Spinney Lane, Aylesham,**

**Proposal - Outline planning application (with all matters reserved apart from access) for development comprising of residential units and flexible non residential floorspace and associated infrastructure and other works incidental to the proposed development**

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

### **Transport Vision**

We welcome the proposed Vision as detailed in the Transport Assessment, which lists the following development priorities:

- *Reducing the need to travel through the provision of a mixed use local centre, which will allow a significant proportion of daily needs of future households and other end-users to be met on-site.*
- *Ensuring sustainable modes of travel are the first and natural choice of future households and other end-users.*
- *Promoting excellent walking and cycling links to public transport infrastructure/services including Aylesham and Snowdown rail stations, and a range of amenities available in Aylesham village centre.*
- *Contributing towards the increased frequency of local bus services operating between Aylesham and Canterbury, alongside high-quality information and improved waiting/interchange facilities at Wingham.*
- *Providing community and open spaces to engender social interaction, community participation and health and wellbeing.*

## **Planning Policy Context**

This site relates to Local Plan Policy SAP24 which envisages it as an extension to the village of Aylesham, The following points are relevant to the Transport Assessment of this application:

*“e) Development on the site should be well-related to the existing settlement of Aylesham and respect the residential amenity of adjoining properties. Development should be located within the District boundary, to the north and east of Ackholt Wood, along the Aylesham Road towards Snowdown Village and on the parcel of land to the east of the Aylesham Road.*

*f) Suitable access arrangements will be provided from Spinney Lane and Aylesham Road;*

*g) The following will be required in relation to wider strategic and local highway mitigation measures, to be informed by a Transport Assessment in accordance with Policy T12:*

*I. Improvements to the Spinney Lane/Adisham Road/Pond Lane Junction;*

*II. Improvements to the Holt Street/Aylesham Road Junction;*

*III. Proportionate financial contributions towards Whitfield and Duke of York roundabouts mitigation identified within Policy SP12;*

*IV. Assess and identify impacts of the development on the strategic road network, in particular the access to the A2 from the B2046 and the A256/A257 Junction identified within Policy SP12, and deliver or contribute proportionately towards any required mitigation;*

*V. An assessment of the impacts of the proposed development on the surrounding rural road network, identifying any mitigation as required.*

*h) On and off-site sustainable transport measures including new and improved pedestrian links and cycle paths to connect the site with Snowdown railway station and the services and facilities in Aylesham: and public transport provision should include Thanet and Sandwich as destinations, informed by a Travel Plan which will be required in accordance with Policy T12. The Travel Plan for the site should include targets and measures to achieve a modal shift from private car to sustainable travel modes of a minimum 10%, with opportunities for feedback and incentives for use for an initial period, to be agreed with the Local Highway Authority;”*

*Policy SP12 also states the following relevant point:*

*“the Council will support proposals for the rural demand-responsive bus service and other improvements to local bus service provision.” Further, “proportionate developer contributions will be sought from new development to support these strategic schemes, having regard to the Infrastructure Delivery Plan or any subsequent guidance. This will be secured by S106 and/or S278 agreements. This may include contributions or on-site provision for associated complimentary infrastructure.”*

It is further noted that this application has come forward for the consideration of 800 dwellings, instead of the indicative capacity of 640 quoted in the Local Plan allocation.

## **Highway Safety Analysis**

I note that the study area for the PIA analysis does not appear to include the A2 westbound off-slip and the A260 as far as the interchange with Adisham Road. Given that this also constitutes a significant access route into Aylesham, it seems prudent to include this within the analysis.

It appears that National Highways have not yet commented on the application, assuming they have been consulted with respect to the potential impact on the A2. They may have pertinent comments to make on the PIA analysis in relation to the slip roads at the interchange with the A260/Adisham Road.

With regards to the incident data reported on the local highway network, it appears that there is no evidence to suggest that there are any inherent safety concerns on the local network that would be exacerbated by the impacts of this development, save for those where appropriate mitigation is already identified and proposed.

### **Baseline Traffic Survey Data**

The Highway Authority notes the submission of new traffic surveys with this application, and concurs with the locations surveyed and methodologies employed to inform the Transport Assessment.

Again, National Highways may have pertinent comments to make on the count locations and their acceptability for capturing vehicle movements at the slip roads at the interchange with the A260/Adisham Road.

### **Development Proposal**

#### Masterplan

I note the inclusion of the Illustrative Masterplan with this application, and although this provided a useful indication of potential site layout, and how the proposed development might relate to its surroundings, it needs to be clear that in the absence of specific comments on such, this is not construed as an agreement from the Highway Authority as to its suitability for progression to any reserved matters application, which would have to be assessed on its own merits in due course.

Noting that layout is a reserved matter, I would nevertheless take the opportunity to make the following observations on the submitted Masterplan:

- As an extension of Aylesham, the site needs to be well-related and linked to services in the village, akin to the extant Aylesham village extension to the north. As we have indicated before, the development should provide a sustainable movement corridor on Dorman Ave South into the village centre, and address the circulation of such movements around Market Place. There should be additional cycle parking adjacent to village amenities, along with schemes to encourage cycle use, reflective of the likely trip types. Cargo bike hire may be a suitable example in this location. A sustainable movement corridor would ideally extend along Dorman Avenue South into the site, via a Toucan or possibly Tiger crossing over Spinney Lane (as opposed to the Puffin crossing presented on the plan), along with a suitable way of prioritising sustainable traffic over the internal spine road. Such a route should adhere to the LTN1/20 standard in prioritising such movements as much as possible. This would be in keeping with the priorities set out in the site's own Transport Vision and Local Plan policies. Relation to the train station should also be considered – is more cycle parking required there? Which cycle route are we promoting for access?

- Links from neighbouring phases into a sustainable movement corridor running south-north through the site should be strengthened and made more intuitive for pedestrians and cyclists. Such movements should also be prioritised over the internal spine road to the west of the local centre.

- The mixed-use local centre would be better served by sustainable modes if it lay at the convergence of the south-north and an east-west sustainable movement corridor.

- The plan suggests that many of the dwellings fronting the internal spine road will have direct access onto it and would probably be served by tandem parking arrangements. This propensity for excessive vehicle movements on and off the road is not optimal for a potential bus service provision along this route, and the arrangement of the spine road would need to be carefully considered to ensure that services are not precluded. The geometry of the spine road is largely suitable to attenuate vehicle speeds, although we would also anticipate that a reserved matters application for the spine road would also give consideration to minimising direct accesses and tandem parking arrangements, as well as providing additional visitor parking bays to ensure the reduction of obstacles to the free movement of buses. We would expect the spine road to be constructed to an adoptable standard and offered for adoption by the Highway Authority to facilitate such services in the future. Indicative bus stop locations should also be considered now to ensure that as many dwellings as possible fall within the 400-metre walking distance envelope.

- The plan also indicates a large number of rear parking courts within the development, and although this can be a good way to improve the street scene and keep roads clear, these will only be well-utilised if they are accessible/convenient to the houses they serve and are secure by design, otherwise, many residents will simply park as close to their front door as possible.

- The allotments should be provided with parking, as tenants may come from a wider area than just the development.

### **Phasing Plan**

Although indicative at this stage, I welcome the apparent early provision of the internal spine road through the site, which will allow a secondary point of access onto the highway network. The document indicates this will be provided no later than the completion of the 144th dwelling. Equal priority should also be given to the delivery of a south-north sustainable movement corridor through the site in line with Dorman Avenue, so later phases of development can simply link into it.

With a single point of access serving 105 units, a secondary/emergency access will likely be required for the parcel to the east of Aylesham Road, consisting of Phases P1B.4-6. With a single point of access serving 185 units, a secondary/emergency access will likely be required for Phases P2A.1-3 and P3.1-2.

### **Proposed Access Arrangements**

The B2046 Adisham Road has, to date, remained largely unaltered despite the previous growth in Aylesham. Now with a significant number of additional dwellings planned, and the associated increase in turning movements at the above junctions, it would be appropriate to revise the existing speed limits. With this in mind, the B2046 should be subject to a new to a 50mph speed limit encompassing the above three junctions. In addition to this, to rationalise the remaining roads and those changes proposed by the development, the following speed limit revisions should also be carried out: Cooting Road (whole length): 30mph; Spinney Lane from Adisham Road junction to east of Cooting Road junction, 50mph; Spinney Lane remaining length, 40mph (very limited highway width is available for new speed limit signing so a kerb build out on the northern side should be introduced to site a gateway feature and slow inbound traffic); Aylesham Road, 40mph to tie onto existing 30mph limit at Snowdown.

A plan showing the above revisions should be provided by the applicant to enable this to be conditioned as part of off-site highway improvement works.

The latter two 40mph limits could potentially be reduced further to 30mph, this would however rely on significant frontage development closer to the roadside than the illustrative masterplan shows at this stage. This issue could be revised further in the future if appropriate.

I question the proposed rumble strip feature shown on Aylesham Road south of Spinney Lane, as the Highway Authority are unlikely to want such a feature from a noise or maintenance liability perspective.

I am largely satisfied with the site accesses as presented in the plans, in the context of the proposed speed limit changes, however, these accesses should be subject to swept path assessment for refuse vehicles, along with buses for the primary and secondary accesses for the western parcel.

### **Development Trip Generation, Distribution and Assignment**

Further to initial scoping discussions with the applicant, the methodology of this section of the Transport Assessment was previously agreed. It was the view of the highway authority that the census data, as previously employed to support SAP24's inclusion in the Local Plan, needed further validation from the Kent Strategic Model (KSM), to give a higher level of confidence in the resultant trip distribution. The new traffic surveys carried out by the applicant were also employed to further validate the model for this part of the local highway network.

Generally, the validated trip distribution is reasonably consistent with the census data, although helps to illustrate the more granular detail of impacts on the rural road network, which are considered acceptable.

### **Highway and Transport Impacts**

The Highways Authority is satisfied with the approach taken of the assessment of impacts on the local road network. I would make the following comments though in regard to specific junction assessments:

#### **- B2046 Adisham Road/Spinney Lane**

The options for mitigation at this junction appear to be either the provision of a right-turn lane but with sub-standard visibility to the north, or enhance visibility without a right-turn lane. The first question we would ask is whether a right-turn lane is needed here based on the queuing data. If land can be negotiated to improve visibility, then is it not possible to negotiate land for a right-turn lane as well?

#### **- A257 Canterbury Road/B2046 Wingham High Street Junction**

Previous Technical assessment of this junction has determined that little can be done to improve capacity due to space constraints. The proposed development has been modelled to add 49 vehicle movements through this junction in the AM peak and 53 in the PM peak, or 1 additional vehicle every 72 seconds on average, either routing from the A257 to the B2046 or vice versa. Recent traffic data collected from this junction indicates that baseline flows have decreased and a position was taken at the site selection stage that further development in Aylesham could feasibly support a tangible improvement in bus service provision for journeys routing in this direction, to offset its own impact and trips from elsewhere in Aylesham and

along this corridor, thus helping to mitigate impacts at this junction.

- Holt Street/Aylesham Road

The proposed signalisation of this junction for the sake of improved pedestrian facilities is noted, and these plans with supporting LINSIG modelling have been forwarded to our Intelligent Traffic Systems team for comment. These improvements undoubtedly improve the pedestrian offering, but I am unsure as to how they relate to impact from this development, and would only make sense as part of a broader pedestrian route connecting the development to this location, whereupon one would have to ask whether improving access to Aylesham Station might be more of a priority for this development.

- B2046 Adisham Road/Dorman Avenue North Junction

The assessment indicates an improvement in capacity as a result of previously proposed improvement works at this junction. However, in light of visibility constraints the scheme would create, as raised in the safety audit, the applicant considers that the improvement is not justified. The Highway Authority concurs with this approach, especially in light of likely net development impact at this junction.

- B2046 Adisham Road/A2 Junction

Although there is discernible impact on the on junction in the projected future peaks, mitigating such may be difficult to justify in terms of both severity and cost-efficiency. We would need to take a balanced view as to how improvements to sustainable transport measures elsewhere on the network offset the forecast uplift in this location and consider net gain.

- A2/A260 Junction

Although mitigating the queuing evident in the projected future peaks may be difficult to justify in both terms of severity and cost-efficiency, I would consider it unlikely that the other forms of mitigation cited would have an appreciable effect on journeys routing via this junction. We would need to take a balanced view as to how improvements to sustainable transport measures elsewhere on the network offset the forecast uplift in this location and consider net gain.

- A2567/A257 Junction

I note that the Local Plan mitigation scheme performs with marked improvement on the A256/A257 arms with forecast traffic factored in. Consequently, this development would need to make a timely and proportionate contribution to the delivery of this scheme, as laid out in the adopted Infrastructure Delivery Plan.

## **Promotion of Sustainable Travel Modes**

### **Bus Strategy**

Although I welcome the stated intention to fund the enhanced provision of bus services, the Transport Assessment is light on detail as to what needs to be achieved through the bus strategy for this site. It is the view of the Highways Authority that developer funding would be best utilised funding a new bus service, as opposed to extending an existing service or funding further DRT services.

Considering the 'Vision and validate' approach to Transport Assessment, we need to start with the number of trips we need to offset and plan how bus services can meet that target, looking at likely patronage/commercial viability of service, etc. The bus strategy needs to mitigate car journeys through the A257 Canterbury Road/B2046 Wingham High Street Junction, and thus needs to be looking specifically at a service that can accommodate journeys on the A257 west corridor. Initial discussion have been had with the network operator, and they are looking at options for such a service. Requirements for pump-prime funding, technical and infrastructure considerations, routing, etc have also been highlighted to the applicant, and add the requisite detail for a feasible bus strategy for this site.

Alongside this, we require flexibility in any S106 agreement to possibly use some or all of the contributions on alternative highway measures to mitigate the validated impact on Wingham, if alternative options were to present themselves in the interim before a service would need to be in place for this development.

#### Draft Residential Travel Plan

As stated previously, this needs to promote bus/rail travel through effective voucher schemes. Further investigation into effective measures in promoting sustainable travel habits in new residents, along with specific commitments to providing them would help support this application.

I trust the above comments are of use and I look forward to consulting further as required.

Yours faithfully

#### **Director of Highways & Transportation**

\*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.