

Draft Canterbury District Local Plan focused consultation

(Regulation 18) September 2025

Response from CPRE Kent

Introduction

We are CPRE Kent, the countryside charity. Founded in 1926, CPRE is one of the country's longest-established and most respected environmental charities. CPRE Kent are the largest of the CPRE county branches, representing more than 1,170 individual members across the county. This response has been prepared jointly by the Kent Branch office and the Canterbury District Committee, working together with our local members to ensure it reflects an agreed position. For ease of reference, all comments are expressed simply as being from 'CPRE Kent' throughout this response.

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside. Our countryside is a priceless national non-renewable resource. CPRE's core objective is to protect and enhance the beauty and tranquillity of the English countryside. This shapes our approach to land supply for new homes. Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

We welcome the fact that a number of the concerns raised at the last consultation appear to have been listened to and we strongly support and endorse the removal of the proposed allocation at Blean (previous policy C12) and the deletion of Land North of Hollow Lane (previous policy C7).

That said, much more work remains to be done. We are dismayed at the reintroduction of the strategic allocations proposed to the east of Canterbury, now being proposed without the necessary supporting infrastructure. We are similarly dumbfounded with respect to the proposed allocation of Thanington Recreation Ground for a park & ride facility. As such, despite improvements, we continue to hold significant concerns that this draft plan does not yet amount to a sound or sustainable strategy.

We therefore respond to the current consultation as follows:

- **Our overarching concerns** – these are matters of principle that we consider fundamental to the soundness and sustainability of the plan as a whole.
- **Our detailed comments on newly-proposed allocations and policies** – these are observations, objections or supporting comments we wish to make in respect of specific proposals now included in this draft.
- **Our updated comments on previously-consulted policies and allocations** – while we recognise that this consultation is not formally seeking further representations on previously-consulted policies, we consider it important to update our comments where either the policy context itself has changed or circumstances on the ground have shifted. We trust that these updated comments will be appropriately considered alongside our earlier representations, which otherwise remain extant.

CPRE Kent's overarching concerns

While our detailed comments against the relevant policies are provided below, we raise the following overarching concerns that are relevant to all aspects of the plan.

1. Greenfield site allocations

The draft plan continues to rely excessively on major greenfield allocations, both new and retained, despite clear evidence that this approach is unsustainable. The proposed East Canterbury sites compound this issue. Although no longer tied to the delivery of an eastern bypass, which CPRE Kent objected to, they are now presented on the back of a much more limited A2 link at Bridge, supported by a park & ride and bus-only connections. As we set out further below, these changes firstly strip away the original justification, though more significantly leave these allocations without a credible or deliverable access strategy. Funding and feasibility for the A2 link remain highly uncertain, and no convincing assessment has been produced of how the very substantial traffic impacts will be addressed.

These concerns are further compounded by the retention of Merton Park and Brooklands Farm. At Merton Park, the loss of the promised A2 off-slip makes the allocation even less defensible, intensifying highways and air quality impacts already judged unacceptable. Brooklands Farm, as CPRE Kent have consistently set out, is constrained by flood risk, ancient woodland, heritage settings, biodiversity loss and traffic congestion. These sites, however, remain in the plan.

Taken together, the East Canterbury allocations, combined with the continued promotion of Merton Park and Brooklands Farm, reflect a spatial strategy that is neither sustainable nor strategic. Instead of addressing long-term land pressures through an integrated approach that maximises brownfield capacity and prioritises multifunctional benefits from land, the Council has fallen back on large, car-dependent greenfield schemes. The reliance on greenfield allocations in this draft plan inevitably means more roads and more travel by car whereas instead development should be directed to locations where buses, walking and cycling are the first choice – which is exactly what a genuine brownfield-first strategy would achieve.

Accordingly, CPRE Kent still do not consider the spatial strategy to be sound.

As a final point but linked, it is particularly frustrating that at this late stage in the Regulation 18 consultation process there remains no overarching masterplan to show how the large-scale developments already allocated in the adopted Local Plan, particularly South Canterbury, are intended to be integrated with **all** the new proposals now being advanced, *ie* those proposed in the earlier consultation alongside those proposed within the current focused consultation. Some sites have simply been pulled across from the previous draft, while others have been dropped, with now fresh allocations being proposed, yet there is no clear explanation of how the different elements of growth are meant to work together. The result is the appearance of piecemeal expansion rather than a coherent spatial strategy.

Without a framework that shows how all the different developments fit together, the Council is obscuring the true scale of countryside loss. By presenting sites in isolation and avoiding a clear masterplan, it appears the Council is being deliberately opaque with its residents. This lack of openness undermines public confidence in the Local Plan process. We believe that if the full extent of what is proposed were openly set out in one place, far more local people would recognise the scale of damage to the countryside and join us in our dismay. They would also be far more likely to support our call for a genuine brownfield-first strategy that protects farmland and landscapes while meeting housing need more sustainably.

2. Failure to prioritise brownfield allocations

Unfortunately, it remains CPRE Kent's view that the emerging plan is continuing to fail to take brownfield development seriously. Despite holding a call for sites in autumn 2024, no significant new brownfield allocations have been made. For Canterbury, the Brownfield Register identifies just 68 sites, providing only 1,645 dwellings, a figure wholly inadequate when set against the scale of need and the pressing need to protect countryside. CPRE's

State of Brownfield Report 2025 shows enough land nationally for 1.48 million homes, half with planning permission already in place, confirming that brownfield is a real and deliverable resource if given priority.

It remains our view that instead of allocating more greenfield, the Council should be maximising capacity on the brownfield sites it already knows about. It is not enough to list locations such as those in policies C4, C21 and HB2 as 'opportunity areas' without any clarity on what level of development is expected. Without masterplans and clear commitments, these sites will never attract regeneration funding or deliver the homes that are needed.

As we previously argued, there is clear scope for higher densities. The Wincheap Commercial Area (Policy C19) is currently earmarked for just 1,000 homes, yet with careful design this could be far greater. The same applies to the Military Road site (Policy C21). Higher-density brownfield development brings people closer to services and transport, reduces car reliance and breathes new life into underused land.

We are particularly disappointed that the emerging town centre strategies for Canterbury, Whitstable and Herne Bay, and the urban capacity review, have not been published alongside this consultation. CPRE nationally has argued for local brownfield strategies and targets to be set through local plans, to drive action and overcome obstacles. The failure to integrate this work here means the Council is missing exactly the kind of regeneration-led opportunities that could reduce reliance on destructive greenfield expansion.

In short, this plan does not amount to a genuine brownfield-first strategy. Until the Council fully commits to maximising the potential of brownfield sites and aligning town centre regeneration with the Local Plan, CPRE Kent will continue to object in principle to the proposed spatial strategy. The inclusion of a clear brownfield target within the housing requirement would be a necessary first step towards addressing these shortcomings and ensuring that greenfield release is only considered once all reasonable brownfield opportunities have been exhausted.

3. East Canterbury site allocations

CPRE Kent are particularly concerned to see the re-emergence of the strategic allocations proposed to the east of Canterbury. When first put forward in 2022, these sites were explicitly justified on the basis of being delivered alongside a full eastern bypass, which has now been dropped. CPRE as a charity does not in principle support the construction of new roads given the well-evidenced risk of induced traffic and environmental harm and so supported its removal. The result, however, is a strategy that manages to combine the environmental harm of large-scale greenfield development with none of the infrastructure once claimed to make it workable. Accordingly, we consider there to be no clear or sustainable justification for the allocations as currently proposed.

In place of the relief road, the plan now relies on a far more limited A2 link at Bridge, alongside a new park & ride and bus-only connections. No credible assessment has, however, yet been provided to show how such measures could absorb the traffic generated, nor any evidence that the A2 link is financially or practically deliverable. Without the necessary infrastructure in place, pushing growth in this direction will cause serious problems and leave these sites without any realistic or sustainable way of being accessed.

The Topic Paper accompanying this consultation suggests that the proposed A2 link at Bridge, together with a new park & ride and bus-only connections, would *"help distribute traffic"* and provide sufficient mitigation for the East Canterbury allocations. We fundamentally disagree. No evidence has been presented to show that these limited measures could accommodate the scale of traffic associated with thousands of new homes, or that they would be delivered in advance of occupation. To suggest that limited measures like a park & ride and bus-only links can replace the major infrastructure once deemed essential is simply not credible and risks locking Canterbury into more congestion and car dependency.

Equally unjustifiable is the proposal that the developer of the site nearest the railway line would not be required to provide funding for the bridge link across the railway into the South Canterbury urban extension until after the occupation of 1,000 dwellings, effectively postponing a key piece of infrastructure that is integral to sustainable access, while developers of the other East Canterbury and Littlebourne sites appear to have been exempted from contributing at all.

As alluded to above, these concerns are compounded by the absence of any overarching masterplan to coordinate the three individual sites. Fundamental questions remain unanswered, including how foul-water drainage will be managed given the well-documented constraints of Canterbury's system and the unresolved Stodmarsh issue. Equally troubling is the lack of clarity over the proposed new link road between the top of Bekesbourne Lane and the A2 via South Canterbury. No evidence has been presented on funding, timing or route. Nor is there any explanation of how traffic from the sites would reach Sturry Road or the A28 towards Thanet without either overloading the city's ring road or funnelling additional congestion on to rural lanes already under pressure.

CPRE's policy position is clear that new roads should only ever be considered in the most exceptional circumstances and that additional highway capacity simply generates more traffic, emissions and environmental harm. CPRE policy is for development to be located where sustainable transport is a genuine first choice, with investment focused on buses, walking and cycling rather than new car-based infrastructure. By relying on a speculative A2 link and pressing forward with poorly-evidenced allocations, the East Canterbury strategy entrenches car dependency instead of delivering the integrated land use and transport planning that both the NPPF and CPRE policy demand.

4. No update to the draft Transport Strategy

It is extremely disappointing that there is not an updated Transport Strategy to accompany this consultation. Clearly good planning requires that land use and transport must be planned together from the outset, with development directed to locations where sustainable travel is a genuine first choice. Without such a framework, there is no way of assessing whether the proposed allocations can be supported by measures that reduce car dependency rather than further entrench congestion on Canterbury's already constrained network.

We are particularly concerned at the misplaced reliance on park & ride schemes as a catch-all solution. CPRE policy explicitly does not support new park & ride schemes, recognising that they tend to generate additional car trips rather than reduce them. The idea of an environmentally-damaging new facility off Littlebourne Road is wholly inappropriate in a sensitive landscape setting and has no evidential basis for reducing car use. Likewise, the proposal to relocate the Wincheap park & ride to Thanington would cause serious loss of amenity for residents while failing to address structural congestion in the city's historic urban and suburban road system.

More fundamentally, there is no evidence of serious follow-through on the Council's stated 'bus first' strategy. The Canterbury Alliance for Sustainable Transport (CAST) made this clear in its response to the June 2024 consultation, stressing that such a strategy can only succeed if backed by concrete measures: reallocating road space, prioritising walking, cycling and public transport and securing funding through parking controls or road-user charging. Without these interventions, 'bus first' remains a slogan rather than a deliverable plan.

The broader policy environment also needs to be acknowledged. Kent County Council, which has responsibility for transport, is currently led by a coalition that has publicly opposed many of the very measures such as road pricing, parking restraint and the reallocation of road space that would be essential if Canterbury were to deliver a genuinely sustainable, non-car-dependent strategy. This raises serious doubts about whether the conditions exist to deliver on the NPPF's requirement for vision-led transport planning. Paragraphs 108 and 112 of the NPPF make clear that transport issues must be considered from the earliest stages of plan-making, with solutions identified that reduce car dependency and enable sustainable modes to shape well-designed, liveable places. At present, there is little evidence that these expectations are being met.

Experience in Canterbury already shows the pitfalls of road-led expansion. The Sturry Relief Road and associated housing demonstrate the problems of relying on piecemeal highway schemes to unlock growth, while the abandoned 'Eastern Movement Corridor' underlines that bypass-driven strategies are financially and practically undeliverable. It is deeply concerning that the current draft risks repeating these same mistakes rather than learning from them.

CPRE Kent remains apolitical, but it is now particularly important to recognise that the success of any Local Plan strategy depends on alignment with the transport authority's willingness and capacity to implement the measures needed. It is therefore vital that Canterbury City Council is bold in demonstrating how its Local Plan strategy will comply with the NPPF's vision-led test, taking the lead and initiative where necessary, so as to ensure the soundness of the plan.

In short, without an updated and deliverable Transport Strategy aligned with CPRE's sustainable transport hierarchy, the plan's reliance on unsustainable greenfield growth around Canterbury cannot be justified and represents a failure to integrate land use and transport planning as national policy requires.

5. Not learning from past failures

It remains CPRE Kent's overriding concern that this draft plan still shows no real evidence of learning from the delays and difficulties experienced with large greenfield allocations under the 2017 Local Plan. Those allocations were promoted on the basis that infrastructure could be viably delivered through developer contributions, yet the record since then demonstrates otherwise.

Mountfield Park, the so-called South Canterbury urban extension, remains largely stalled years after its allocation. This delay stems from inadequate anticipation of fundamental challenges, including wastewater treatment capacity, the electricity supply needed to serve the site and the wider cumulative environmental constraints that had long been raised through consultation. The same is true of Saxon Fields at Thanington, where housing delivery has been slowed by the lack of timely provision of infrastructure around the A2/A28 junction and the evident traffic consequences that were underestimated at the allocation stage.

The allocations around Sturry have been nothing short of disastrous, with progress stalled by unresolved access problems and transport mitigation measures that have proven wholly unviable. The former Herne Bay Golf Club has fared no better, with development delayed by flood risk, access and drainage issues that were entirely predictable at the time of allocation yet still left unaddressed. It is also the case that the slow build-out of Thanington Park and of Howe Barracks has meant considerable delays in completion of new infrastructure, which was meant to be fully funded by developers and in place by 2022

Taken together, these examples reveal a pattern of over-optimism at the plan-making stage, with insufficient weight given to local objections and clear evidence of infrastructure constraints. As CPRE Kent set out in our earlier submissions, allocations have been advanced without robust evaluation of affordability or viability of infrastructure, and with inadequate regard for accessibility, traffic movements, wastewater treatment, environmental harm, water and electricity supply, schools, healthcare, affordable and social housing and provision of green space. The inevitable result has been long delays, heightened local opposition and fewer homes delivered in practice than was promised on paper.

Canterbury also needs to be alive to the realities of the current housing market. As CPRE Kent have repeatedly highlighted, the delays to large greenfield sites are not an accident but a feature of a system in which volume housebuilders release homes only at a pace that sustains high prices. Across Kent, more than 70% of consented homes remain unbuilt, while major developers openly confirm they are slowing build rates to protect sales values. In this climate, simply allocating more large and complex greenfield sites is no guarantee of delivery.

If the Local Plan is to stand any chance of being realised, Canterbury will need to take a far bolder and more hands-on approach to housing delivery, intervening proactively to unlock brownfield land, diversify the market and support smaller and medium-sized builders. Without this, the plan risks repeating the same failures seen under the 2017 Local Plan, with communities left to bear the cost of undelivered infrastructure and the needless loss of countryside.

The lesson that should have been drawn is that allocating large tracts of greenfield land in the hope that infrastructure will somehow follow is not a credible strategy. Yet the current draft plan proposes to repeat precisely this pattern with new and retained allocations, despite the mounting evidence that such an approach is both undeliverable and unsustainable.

CPRE Kent's detailed comments on newly-proposed allocations and policies

Question 1: Local Plan period and housing needs

Please **do not** include personal information in your responses below.

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

CPRE Kent recognise that the revised National Planning Policy Framework (NPPF) now requires the standard method for Local Housing Need (LHN) to be treated as a firm starting point, with extremely limited scope to adjust the headline figure. While it remains that we fundamentally do not agree with this national policy and continue to campaign against it and its implications at the national level, we do accept that the Local Plan must take this as the starting point. For Canterbury, this equates to 1,215 dwellings per annum, or 23,085 over the proposed plan period of 2024/25-2042/43.

Notwithstanding this acceptance, as set out both in our previous Regulation 18 responses and in our overarching comments, the key issue is not the theoretical target but the realism of actual delivery. Canterbury has an extremely poor track record of bringing forward large and complex sites allocated in the 2017 Local Plan. Mountfield Park, Saxon Fields, Sturry/Broad Oak and the former Herne Bay Golf Course all illustrate how over-ambitious allocations without viable infrastructure strategies stall in practice, leaving the Council exposed to speculative applications. The Council needs to learn from this.

Equally, as we stressed in our overarching concerns, the current housing market is facing serious headwinds, with delivery rates falling nationally and the development industry itself warning of a prolonged slowdown. It is unrealistic to assume that Canterbury can double historic build rates simply because the standard method says so. As Inspectors have recently acknowledged elsewhere, including at Uttlesford and in their post-hearing advice on the South Worcestershire Development Plan, the test of soundness is whether the plan is justified and deliverable, not whether it blindly allocates to match an undeliverable number.

In South Worcestershire¹, the Inspectors concluded that: *“Despite the Plan not providing for a 5-year housing land supply on adoption, we consider it pragmatic that it proceeds to adoption on this basis... We will not seek provision of further sites in an attempt to boost supply in the short term, which would in any*

¹ https://www.localplanservices.co.uk/files/ugd/017f5b_6423b479f5b44770b212e560eb7a146a.pdf

event demand more housing than is needed for this Plan. The Lichfields ‘Start to Finish’ report gives little comfort as to the value of providing more allocations to boost supply for the short term, given the lead-in times until delivery.”

This reasoning applies squarely to Canterbury. Rather than over-allocating unsustainable greenfield sites to chase a target that the market will not deliver, the Council should be producing a plan that is realistic in terms of phasing and timescales. To CPRE Kent, the correct approach is to adopt a stepped housing trajectory. This would front-load lower delivery rates in the early years, reflecting both the backlog of undelivered 2017 sites and current market conditions, while setting a blueprint as to how the Council currently envisages meeting housing numbers across the longer plan period, though while also recognising the position will be reviewed and refined further in not less than five years. Accordingly, the Council would not need to necessarily fully commit to greenfield allocations that are clearly a significant way of becoming well planned and deliverable sites.

This pragmatic approach has since been explicitly endorsed by the Secretary of State for Housing and Planning in his letter to the Chief Executive of the Planning Inspectorate dated 9 October 2025². In that letter, the Minister made clear that Inspectors should show flexibility where plans are otherwise capable of being found sound, including proceeding to adoption even where a five-year housing land supply cannot be demonstrated at the point of adoption, provided that the plan significantly boosts supply and meets needs across the plan period. The letter further emphasised that proportionate evidence and the use of stepped housing trajectories may be justified in such circumstances. In our view, this statement provides a clear ministerial direction that local plan examinations should favour realism and deliverability over rigid adherence to short-term supply tests. It therefore reinforces CPRE Kent’s position that Canterbury City Council should adopt a pragmatic, plan-led approach that prioritises a deliverable trajectory over excess allocation that ensures the plan can be adopted without delay.

Such an approach is both pragmatic and consistent with national policy, as the overall trajectory still demonstrates a credible route to meeting need across the plan period as a whole, though recognising the reality that this will be reviewed as circumstances change. It would also help to avoid the situation now unfolding in Maidstone, where a district that had consistently exceeded its housing targets has suddenly found itself without a five-year supply, following the adoption of a plan that was, to all reasonable observers including CPRE Kent, completely unrealistic.

We therefore strongly urge Canterbury City Council to:

- acknowledge openly that actual delivery in the early years will fall significantly short of the standard method target
- adopt a stepped trajectory that reflects what can realistically be built
- avoid locking itself into unsustainable greenfield allocations that stand little chance of ever becoming genuinely well planned or deliverable by recognising the position will be reviewed in five years, and in the meantime...
- focus on maximising brownfield and smaller, deliverable sites rather than relying excessively on large, infrastructure-dependent greenfield allocations that experience shows are unlikely to deliver.

² https://assets.publishing.service.gov.uk/media/68e7d53a187483de54d766f0/Local_Plan_examinations_-_letter_to_the_Chief_Executive_of_the_Planning_Inspectorate.pdf

Question 2: Affordable housing and social rent

Please **do not** include personal information in your responses below.

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

CPRE Kent strongly reiterate the point made in our previous submissions and overarching comments that Canterbury must take a far bolder and more interventionist approach if it is serious about tackling the district's acute affordability crisis. Social rent must form a central plank of the Local Plan, not an afterthought. Delivery cannot be left to the market alone, as recent history shows this will fail. The Council should therefore set a clear and ambitious requirement for social rent provision and actively pursue mechanisms – including public land assembly, masterplanning and working with Homes England and Registered Providers – to ensure this is delivered on the ground. Without such decisive action, the Local Plan will repeat past failings and continue to provide housing that is unaffordable to those who need it most.

Question 3: Economic development and modern economy

Please **do not** include personal information in your responses below.

3. **Do you have any comments about how the new Local Plan should plan for economic growth in the district, including in respect of modern economy uses?**

CPRE Kent's position remains that economic growth must not be pursued in isolation but placed on an equal footing with environmental protection and genuinely sustainable development. As we set out previously, the Local Plan should not over-allocate employment land or prioritise modern economy uses without robust evidence of need and deliverability. Instead, growth must be planned in a way that safeguards landscapes, prioritises brownfield regeneration, reduces car dependency and ensures that the quality of life and environment on which Canterbury's economy ultimately depends are properly protected.

We also make specific calls below again for the deletion of Policy C17, which is clearly no longer justified following the confirmation that the anchor tenant, Chapel Down, has confirmed that it no longer intends to develop this site.

Question 4: Water infrastructure and delivery

Please **do not** include personal information in your responses below.

- 4. Do you have any suggestions about how the new Local Plan could ensure that improvements or upgrades to water infrastructure are considered earlier in the planning application process to support sustainable development?**

As we set out in our previous responses, one of the clearest lessons from the failure of the 2017 allocations is that development was allowed to proceed without realistic solutions for wastewater treatment, drainage or wider environmental capacity. The new Local Plan must ensure that water infrastructure is addressed from the outset, with early engagement with utilities and clear evidence of capacity before any sites are allocated.

As the Council will be aware, water companies across England are now openly warning that existing treatment capacity cannot keep pace with the government's housing targets. In many catchments, particularly around growing urban centres, water companies are now advising local authorities to refuse applications or apply Grampian conditions preventing occupation until upgrades are delivered. A recent appeal in Wealden confirmed that councils are within their rights to impose such restrictions where there is insufficient treatment capacity, even without direct objection from the utility provider.

These developments illustrate a national pattern of regulatory and infrastructure failure that Canterbury cannot ignore. Against this backdrop, reliance on major new allocations in already water-stressed catchments – whether tied to the uncertain Broad Oak reservoir or otherwise – would be reckless. Each year the prospects for filling that reservoir diminish as the Stour's flow reduces and drought risk increases. The KCC 2020 Climate Change Risk and Impact Assessment identifies "drought in already water-stressed areas" as one of Kent's highest risks, yet this remains treated as an afterthought rather than a binding constraint.

Policies in the new Local Plan must therefore make clear that no development can proceed without proven, funded and deliverable water and wastewater solutions secured ahead of permissions. Unless these requirements are front-loaded and treated as a binding limit on growth, Canterbury risks repeating the mistakes seen elsewhere – approving development in principle only for it to be stalled, blocked or refused later when the infrastructure simply does not exist to support it.

Part 2 – Draft Local Plan policies for consultation Canterbury area

Question 5: Deletion of the draft strategic development allocation at Land north of the University of Kent (Policy C12)

5. Do you have any comments on the proposed deletion of Land north of the University of Kent (Policy C12)?

CPRE Kent fully support the proposed deletion of Land north of the University of Kent (Policy C12). This allocation was wholly inappropriate, threatening one of Kent's most important natural landscapes at the heart of the Blean woodland complex. Its removal reflects not only the strength of local objection but also the clear evidence base set out in *Voices of the Blean* (Rachael Reilly, UCL Anthropology, 2025)³, an independent social research project jointly commissioned by CPRE Kent, Kent Wildlife Trust and Save the Blean.

The study documents the extraordinary depth of local attachment to this landscape and records significant health and well-being impacts already being felt by residents from the uncertainty surrounding the plans. Sixty-four per cent of respondents reported that the threat of development had already harmed their health, while many described acute anxiety, stress and fear of losing their sense of place, community identity and access to the natural environment. It also demonstrated the profound importance of this land for local communities' health, well-being and sense of place, with more than half of participants using it weekly for walking, cycling, commuting and recreation. The findings were stark: widespread concern over the loss of wildlife and habitat, deep emotional attachment to the land and evidence that the very threat of development had already caused anxiety, stress and, in some cases, residents considering leaving the area altogether. This evidence sits alongside the site's clear environmental constraints.

Clearly it is therefore the case that Blean Woods is a vital and irreplaceable natural asset for people and wildlife. Proposing to compromise it with 2,000 houses was shocking and unsustainable. The Council is right to have listened to local voices and to have recognised that this allocation was unsound. Crucially, the findings of our research remain highly relevant, particularly in relation to the Brooklands Farm allocation, where many of the same concerns about loss of habitat, community well-being and access to the countryside clearly apply. Going forward, we urge the Council to learn from this experience and adopt more participatory, community-led approaches to planning, ensuring that future allocations reflect genuine local needs while safeguarding the natural environment. This decision sets an important precedent that must now be followed through elsewhere in the plan.

We are, however, deeply concerned by the recent confirmation from the University of Kent that it intends to bring forward an application for approximately 2,000 dwellings on its Northern Land Holdings outside the Local Plan process. Such a move would undermine the democratic plan-making process and run directly counter to the sound spatial strategy now emerging. CPRE Kent will certainly fully support the Council, Kent Wildlife Trust, Save the Blean and others in opposing any planning application that may come forward. The Council must therefore hold its nerve and stand by the sound and evidence-based decision to keep this damaging and unnecessary allocation out of the plan.

³ <https://www.cprekent.org.uk/news/how-is-the-onslaught-of-development-proposals-affecting-local-people/>

Question 6: Deletion of the draft strategic development allocation at Land north of the Hollow Lane (Policy C7)

Please **do not** include personal information in your responses below.

6. Do you have any comments on the proposed deletion of Land north of Hollow Lane (Policy C7)?

CPRE Kent strongly support the proposed deletion of Land north of Hollow Lane (Policy C7). This site was never suitable for allocation, being severely constrained by highways impacts, access limitations and the likely harm to landscape character. As we highlighted in our previous representations, it risked compounding the very problems already associated with large-scale greenfield allocations to the south and east of Canterbury, namely car dependency, congestion and unsustainable loss of countryside.

Policy N1: Land at Merton Park

Please **do not** include personal information in your response below.

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

CPRE Kent have consistently raised serious concerns about this site in our previous submissions and do not consider that the additional evidence as published in the Topic Paper overcomes our concerns.

The allocation is heavily reliant on new infrastructure, including upgrades to Hollow Lane, Homersham and their junctions with the A28, as well as the facilitation of a fast bus route from South Canterbury. The Topic Paper itself concedes that mitigation is “likely to be required”, yet no credible evidence has been presented as to how this would be funded or delivered in a timely manner. The site’s adjacency to the A2 also means noise mitigation would be required.

Historic England has raised clear and unresolved concerns about the impact of development on the World Heritage Site, particularly long-distance views of Canterbury Cathedral. While we are told that the site promoter had submitted further heritage work, no further details regarding this have been provided. The site also lies almost entirely within the Canterbury Area of High Landscape Value, is directly adjacent to Natural England Priority Habitat Inventory (deciduous woodland) and sits on high-grade Best and Most Versatile farmland (Grade 1 and 2). It also falls within groundwater source protection zones 1-3 and areas of groundwater vulnerability. Development here would therefore result in irreversible loss of irreplaceable landscape and agricultural assets while introducing potential risks to water quality and supply.

Approximately half the site is covered by Kent County Council’s Brickearth Minerals Safeguarding designation. Parts of the site are affected by historic lime extraction and landfill contamination, which the Topic Paper acknowledges could create additional cost burdens, further undermining the viability and deliverability of the site.

Multiple public rights of way run across the land, including strategic cycle routes. The proposal would require major diversions or upgrades, fundamentally altering the character of the landscape and eroding public access to the countryside. Finally, the site sits within an Area of Archaeological Potential, and

development would compromise long-distance views of the cathedral and the wider World Heritage Site setting.

Overall, it is an over-large, complex greenfield site dependent on uncertain and costly infrastructure delivery, with no guarantee that these obstacles can or will be overcome. In the meantime, the district risks repeating the failures of Mountfield Park/South Canterbury and other stalled sites, with undeliverable allocations exposed to speculative development elsewhere.

8. **Do you have any comments on Site 10: Ridlands Farm and Langton Field, Canterbury, being retained as a Carried Forward 2017 Local Plan Policy?** Please provide any evidence you have to support your comments.

CPRE Kent have no specific comments to make on this policy at this stage but reserve the right to submit further representations at subsequent stages of the plan process should new or updated evidence come to light or if the policy wording is amended.

Policy N2: Land at Langton Lane

Please **do not** include personal information in your response below.

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

CPRE Kent have no specific comments to make on this policy at this stage but reserve the right to submit further representations at subsequent stages of the plan process should new or updated evidence come to light or if the policy wording is amended.

Policy N3: Thanington Recreation Ground

Please **do not** include personal information in your response below.

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

CPRE Kent object in the strongest possible terms to the proposed allocation of Thanington Recreation Ground for a park & ride facility. This policy is wholly unsound and should be removed outright from the draft Local Plan.

Firstly, this site is the only meaningful area of green amenity space for the residents of Thanington, many of whom live in conditions of high deprivation. It provides essential recreational and sporting opportunities and a place for daily use by the local community. To take this land away and replace it only with distant facilities fails entirely to compensate for the permanent loss of local green space. Even if replacement sports pitches are eventually provided, they will be too far away and will not come forward until long after Thanington residents have already lost their recreation ground. This is unacceptable and inequitable.

Secondly, the Council's own evidence demonstrates why this site is not appropriate, and indeed why it has already been the focus of legal action. In 2019, CPRE Kent initiated Judicial Review proceedings against the Council's attempt to expand the Wincheap park & ride car park on to the Wincheap Water Meadows. In the face of huge public concern and opposition, the Council eventually agreed to revoke the planning permission that it had granted itself for this purpose. The issues at stake and the depth of concern remain every bit as relevant today. The SHLAA itself confirms that the entire site is designated Existing Open Space, forms part of the Stour Valley Area of High Landscape Value, borders the River Stour and a Local Wildlife Site, lies within the Canterbury AQMA and is adjacent to Grade II*- and Grade II-listed buildings. It is also covered by Kent County Council's Brickearth Minerals Safeguarding designation. Development here would destroy a valued community facility, harm the setting of heritage assets, sever a vital ecological corridor and increase flood risk within an already highly sensitive river valley. These are not matters that can be screened or mitigated away.

Thirdly, we reiterate our overarching objections to park & ride as a transport strategy. CPRE policy is clear that new park & ride facilities do not reduce traffic overall but instead generate additional car trips, lock in car dependency and cause significant environmental harm. This was evident in the Council's earlier failed proposals at Wincheap Water Meadows and Thanington Recreation Ground itself, both of which had to be abandoned in the face of overwhelming local opposition. To revive this discredited idea again is to repeat past mistakes and to squander resources that should instead be directed into genuine alternatives to car use – such as enhanced bus services, better walking and cycling infrastructure and demand-management measures.

Overall, Thanington Recreation Ground is an irreplaceable community facility and a vital green space. Its loss would be contrary to national and local policy on protecting open space, contrary to the evidence of the SHLAA and contrary to the wishes of the community. CPRE Kent therefore urge, in the strongest possible terms, that Policy N3 be deleted in its entirety. The funding earmarked for this facility should instead be redirected to support sustainable transport alternatives that genuinely reduce car dependency and deliver long-term benefits for Canterbury and its residents.

Policy N4: Land south of Littlebourne Road

Please **do not** include personal information in your response below.

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

Please note that the following comments apply to policies N4-N7 collectively, which we refer to as the East Canterbury allocations.

CPRE Kent wish to make clear at the outset that we object in principle to the East Canterbury allocations. As set out in our overarching comments, we regard this strategy as fundamentally unsound, unsustainable and wholly dependent on undeliverable infrastructure. We note that para 6.41 of the Topic Paper confirms that 349 objections were received on this matter at the last consultation, underlining the breadth of public opposition. This is unsurprising given the devastating impact that the previously proposed Eastern Movement Corridor accompanying these proposed allocations would have had on Old Park & Chequers Wood SSSI and the area around Fordwich.

In addition to our overarching comments, it should be further noted that the allocations collectively sit on Grade 1 and 2 Best and Most Versatile agricultural land, representing an unacceptable loss of some of the district's most productive farmland. The sites border the Little Barton Farm Conservation Area to the west and the St Martin's Hospital Conservation Area to the north, with listed buildings immediately beyond Bekesbourne Lane. Even if the Council considers that sympathetic design could preserve the setting of these heritage assets, the NPPF makes clear that any less-than-substantial harm must still be balanced against wider public benefits. We do not believe such harm can be justified.

The allocations also raise clear landscape and ecological issues. The land is open countryside within the Canterbury Area of High Landscape Value. Ancient Woodland and Priority Habitat are located within and adjacent to the sites, and the land is within the orange risk zone for Great Crested Newts. In the case of the land north of the railway line and south of Bekesbourne Lane, the site itself includes sections of Palmstead Wood West (Ancient Woodland) and areas identified on Natural England's Priority Habitat Inventory. It is bounded to the north-west by further Priority Habitat and again falls wholly within the Canterbury AHLV. Development here would irreversibly fragment ecological networks and degrade valued landscapes. Overall, these sites epitomise the problems of unsustainable edge-of-city sprawl: loss of the best farmland, encroachment on valued landscapes, harm to heritage settings and reliance on uncertain infrastructure.

That said, if the Council is determined to pursue development in this location, it is essential that the policies are recast in a way that at least avoids repeating the mistakes of the past. Foremost, Policies N4-N7 must not proceed as four loosely-related site allocations. As para 6.37-6.39 of the Topic Paper itself acknowledges, these sites are deeply interdependent, particularly in relation to access and transport. To allocate them piecemeal risks precisely the kind of disjointed, uncoordinated growth that has already plagued Canterbury's major developments.

Accordingly, CPRE Kent call for Policies N4-N7 to be merged into a single allocation, clearly identified as the East Canterbury Strategic Development Area (SDA). This area should be subject to a single, binding Supplementary Planning Document (SPD), prepared and adopted by the Council, rather than relying on a patchwork of separate masterplans promoted by individual developers. CPRE Kent's experience both

in Canterbury and across Kent shows that assuming multiple developers will voluntarily align their plans is wholly unrealistic. Only a Council-led SPD can provide the coherent framework needed to avoid the mistakes of piecemeal development.

In terms of mitigation, we strongly urge the following:

The proposed 'bus gate', together with pedestrian and cycle access between the East Canterbury sites and the Spring Lane estate, must be delivered at a very early stage. It must be designed so that it is physically impassable to all vehicular traffic other than emergency services, ensuring it provides a genuine sustainable transport link rather than a rat-run.

The requirement for the link road and new bridge must be advanced to a much earlier stage. Current proposals suggest delivery only after 1,000 completions on the site nearest the railway line. This is wholly inadequate and would guarantee years of gridlock on the east side of the city. We call for the obligation to be triggered after 250 cumulative completions across all East Canterbury sites, ensuring the infrastructure is in place when it is actually needed.

At the very least, they should only proceed as a single strategic allocation underpinned by an SPD and strict phasing requirements. However, our position remains that the East Canterbury allocations are unsound and should be removed from the Local Plan.

Policy N5: Land south of Bekesbourne Lane

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N4 above.

Policy N6: Land north of Bekesbourne Lane at Hoath Farm

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N4 above.

Policy N7: Land at Seotamot

Please **do not** include personal information in your response below.

Please see our comments with respect to Policy N4 above.

Policy N8: Millers Field Car Park

Please **do not** include personal information in your response below.

The following statement applies to Policies N8-N19 collectively.

CPRE Kent are supportive in principle of the allocations set out in Policies N8-N19, as these are all brownfield sites within the Canterbury urban area. Directing growth to previously-developed land is consistent with the objective of protecting the countryside and is the right direction of travel. However, we must reiterate the wider concerns set out in our overarching comments. The Council has not yet demonstrated a genuine brownfield-first strategy, instead continuing to rely excessively on large greenfield allocations. This is deeply disappointing and a missed opportunity to place regeneration at the heart of the Local Plan.

We also stress the need to maximise densities on these urban brownfield sites. Too often the capacity figures given appear cautious and fail to reflect what could realistically and sensitively be achieved. Higher-density development in such locations would make better use of land, reduce pressure on greenfield release and place new housing close to jobs, services and sustainable transport. In short, while we support these allocations, we urge the Council to be much more ambitious in both maximising its potential and in adopting a true brownfield-first approach across the plan as a whole.

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

Policy N9: Land at Hawk's Lane

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N10: Land at Military Road

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N11: Land at Long Meadow Way

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above

Policy N12: Land at Bawden Close

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N13: Land at Copinger Close

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N14: Land at Jesuit Close

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N15: Land at Suffolk Road

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N16: Land at St Stephen's Road

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N17: Land at Whitehall Close

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N18: Land at Sussex Avenue

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Policy N19: Spitfire Ground

Please **do not** include personal information in your response below.

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

Please see our comments with respect to Policy N8 above.

Part 2 – Draft Local Plan policies for consultation Whitstable area

Policy N20: Land east of Chestfield Road

Please **do not** include personal information in your response below.

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

CPRE Kent object to this allocation. The site lies immediately adjacent to Brooklands Farm (Policy W4) and together the two would form a major urban extension, yet no cumulative assessment of impacts has been provided.

The whole site is within an Area of High Landscape Value and is Best and Most Versatile agricultural land. Development here would cause unacceptable loss of landscape quality and productive farmland, contrary to national policy.

Chestfield Conservation Area directly abuts the site on three sides and its setting would be harmed. The site is also within an orange zone for Great Crested Newts and borders Priority Habitat, raising serious ecological concerns.

Taken together, these constraints make the site unsuitable. Like Brooklands Farm, N20 represents unsustainable greenfield expansion and should be deleted in favour of a genuine brownfield-first strategy.

Policy N21: Land at Golden Hill

Please **do not** include personal information in your response below.

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

CPRE Kent object to this allocation. In the 2024 draft plan the site was rightly rejected and instead identified as Green Infrastructure under Policy DS19, recognising its role in protecting the rural character of the A2990 corridor. We see no justification to change this position.

We strongly disagree that a revised boundary and a landscape buffer now mean that development can be accommodated. This corridor was deliberately safeguarded to prevent exactly the kind of coalescent, visually intrusive development now being proposed. A buffer cannot replicate the open landscape qualities of this land or prevent the loss of its Green Infrastructure function.

Development at Golden Hill would compromise the countryside edge of Whitstable and add cumulative pressures alongside Brooklands Farm and Chestfield Road. The site remains unsuitable, and its earlier designation as protected Green Infrastructure should be retained.

Policy N22: Land at Beresford Road

Please **do not** include personal information in your response below.

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

CPRE Kent support this brownfield allocation.

Policy N23: Land to the south-west of Joseph Wilson Business Park

Please **do not** include personal information in your response below.

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

CPRE Kent have no specific comments to make on this policy at this stage but reserve the right to submit further representations at subsequent stages of the plan process should new or updated evidence come to light or if the policy wording is amended.

Policy N24: Land Lying to the West of Golden Hill

Please **do not** include personal information in your response below.

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

CPRE Kent have no specific comments to make on this policy at this stage but reserve the right to submit further representations at subsequent stages of the plan process should new or updated evidence come to light or if the policy wording is amended.

Part 2 – Draft Local Plan policies for consultation Herne Bay area

Policy N25: Moyne

Please **do not** include personal information in your response below.

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

CPRE Kent have no specific comments to make on this policy at this stage but reserve the right to submit further representations at subsequent stages of the plan process should new or updated evidence come to light or if the policy wording is amended.

Policy N26: Land at Beacon Road

Please **do not** include personal information in your response below.

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

We note that the site at Beacon Road (Policy N26) is highly valued by the local community and should be reinstated as public open space to allow it to continue to provide an important facility for both sport and community activity. We share the concerns of local residents that its development would permanently remove what has been a well-used and much-loved amenity, with no adequate or equivalent replacement identified. The Council should ensure that this facility is fully protected in line with national and local policy on safeguarding existing sports and recreational land.

Policy N27: Former Herne Bay Driving Range

Please **do not** include personal information in your response below.

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

CPRE Kent have no specific comments to make on this policy at this stage but reserve the right to submit further representations at subsequent stages of the plan process should new or updated evidence come to light or if the policy wording is amended.

Policy N28: Land to the east of Bullockstone Road

Please **do not** include personal information in your response below.

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

Draft Canterbury District Local Plan (Regulation 18) Consultation September 2025 - Response from CPRE Kent

CPRE Kent have significant concerns with respect to this proposed allocation. The site forms part of the wider area of Existing Open Space (Policy OS9) identified in the adopted Local Plan, which was specifically protected as important green infrastructure within a heavily developed part of Herne Bay. The 2024 Natural Environment and Open Space Topic Paper confirmed that this area should continue to be safeguarded because it provides a vital buffer between built development at the former Golf Course, the Thanet Way and Strode Farm.

We therefore strongly disagree with the Council's new position that the site can be released on the basis that parts of it contain 'brownfield' land and that its removal would not undermine the function of the wider designation. The essential value of this open space lies in its role as a coherent green corridor and buffer. Once built upon, this value is irretrievably lost. A piecemeal review of boundaries to justify development risks undermining the integrity of the entire designation.

In addition to the unacceptable loss of open space, we are concerned about the cumulative effect of further housing in this area when taken together with the nearby strategic sites at Strode Farm and the former Golf Course. This part of Herne Bay has already absorbed significant development, and the additional pressure from N28 would further erode local character, green infrastructure and amenity.

Policy N29: Land at Home Farm, Strode Park

Please **do not** include personal information in your response below.

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

CPRE Kent have significant concerns with respect to this proposed allocation. Our principal concern is the cumulative impact of further development in this part of Herne Bay, where multiple sites are already allocated or under construction. The addition of N29 risks overloading local infrastructure and further eroding the character and green setting of this part of the town, repeating the mistakes of piecemeal growth without regard to its combined effects.

We are also concerned about the impact on the adjoining crematorium. This is a place where peace, dignity and tranquillity must be protected, yet residential development on adjacent land would inevitably harm its setting and amenity.

Policy N30: Land to the west of Bullockstone Road

Please **do not** include personal information in your response below.

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

As with Policy N30 and N29 above, we are concerned with respect to the cumulative impact of further development in this part of Herne Bay, where multiple sites are already allocated or under construction.

Part 2 – Draft Local Plan policies for consultation Rural area

Policy N31: Chartham Paper Mill

Please **do not** include personal information in your response below.

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

CPRE Kent support the allocation of the Chartham Paper Mill site as it represents genuine brownfield land and therefore a far more appropriate focus for development than further countryside release. Redevelopment here offers an opportunity to regenerate a long-standing industrial site and to reduce pressure on sensitive greenfield locations elsewhere in the district.

We do, however, note the site's close proximity to the River Stour and share local concerns about the need for rigorous monitoring and control of any potential sources of pollution. There have been previous pollution incidents associated with the site and it is vital that redevelopment incorporates the highest environmental standards, including robust safeguards to prevent any further contamination of the river.

Given the complexity and cost of bringing this site forward, we also consider that the plan should be more ambitious in requiring higher densities so that its full potential is realised, making best use of scarce brownfield opportunities while ensuring that the scheme delivers genuine environmental improvement.

Policy N32: Land at Rattington Street, Chartham

Please **do not** include personal information in your response below.

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

CPRE Kent object to this allocation at this scale. This is a sensitive site where multiple environmental, heritage and infrastructure constraints make development wholly inappropriate. It is telling that in the 2024 draft plan the site was removed following highways concerns raised by KCC. We do not accept that these concerns have been credibly resolved. The local highway network is characterised by narrow rural lanes and constrained junctions, and additional development here will inevitably add pressure and harm the character of the village.

By contrast, we note that the emerging Chartham Neighbourhood Plan, prepared by the Parish Council and recently subject to Regulation 14 consultation, proposes a modest and well-considered allocation under Policy CNP24 (A3 – Land at Bakers Lane). This site would deliver approximately 13 dwellings, carefully integrated with existing development on the edge of the village, supported by biodiversity net gain, renewable energy provision and improved pedestrian connections. Importantly, it has been shaped and endorsed by the local community through an inclusive process and aligns with the neighbourhood plan's wider objectives of protecting the Conservation Area, avoiding coalescence and maintaining the rural setting of Chartham.

In our view, this neighbourhood-scale approach represents the right balance between meeting local

housing needs and safeguarding environmental and heritage assets. It is entirely consistent with national policy's emphasis on community-led planning and with Canterbury's stated objective of working in general conformity with neighbourhood plans. CPRE Kent therefore urge the City Council to defer to the Chartham Neighbourhood Plan and to reject the much larger and more intrusive allocation at Rattington Street in favour of the locally supported and proportionate proposal at Bakers Lane.

Policy N33: Land at former Spires Academy, Hersden

Please **do not** include personal information in your response below.

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

CPRE Kent have no specific comments to make on this policy at this stage but reserve the right to submit further representations at subsequent stages of the plan process should new or updated evidence come to light or if the policy wording is amended.

Policy N34: Barham Layby

Please **do not** include personal information in your response below.

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

The proposed lorry park at Barham Layby would result in the unnecessary loss of established woodland within the Kent Downs National Landscape and introduce lighting, noise and activity wholly inappropriate to its rural and tranquil setting. The extent of woodland clearance has not been clearly defined, nor has any credible assessment been made of the resulting landscape or visual harm. Of particular concern is the introduction of artificial lighting within an area recognised for its dark skies, a defining characteristic of the Kent Downs and an important element of its natural beauty. Given the recognised pressures along the A2 corridor, the focus should instead be on identifying more suitable and less sensitive locations – such as existing industrial estates or underused transport facilities – rather than adding to the cumulative urbanisation of the National Landscape.

Part 2 – Draft Local Plan policies for consultation District-wide Strategic

Policy N35: Gypsy and Traveller Accommodation

Please **do not** include personal information in your response below.

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

CPRE Kent have no specific comments to make on this policy at this stage but reserve the right to submit further representations at subsequent stages of the plan process should new or updated evidence come to light or if the policy wording is amended.

42. Do you have any other comments you would like to make as part of this consultation?

CPRE Kent's updated comments on previously-consulted policies and allocations

While we recognise that this consultation is not formally seeking further representations on previously-consulted policies, we consider it important to update our comments where either the policy context itself has changed or circumstances on the ground have shifted. We trust that these updated comments will be appropriately considered alongside our earlier representations, which otherwise remain extant.

Policy C17 – Land at Canterbury Business Park

Although Policy C17 (Land at Canterbury Business Park) is not part of the current consultation, CPRE Kent consider it necessary to update our previous objection in light of the recent withdrawal of Chapel Down from the proposed viticulture hub at Highland Court.

The entire business case for this 22.5-hectare allocation rested on the company's specific operational requirement to co-locate grape-growing and production facilities, a justification that no longer exists. Chapel Down's decision, following a year of legal proceedings (initiated by CPRE Kent and others), confirms that the purported 'need' for large-scale built development within the Kent Downs National Landscape was both speculative and exceptional only to that applicant. Without this anchor tenant, there is now no credible rationale for maintaining an allocation of this magnitude in such a sensitive location.

The site remains open countryside, wholly within the National Landscape and the Area of High Landscape Value, where national policy requires the highest level of protection. Any generic employment use would fail the test of exceptional circumstances and would deliver none of the claimed viticultural or tourism benefits originally advanced. With the principal occupier withdrawn and the national wine industry now facing a slowdown and oversupply, the concept of a 'viticulture hub' at this location is no longer viable or justified.

CPRE Kent therefore maintain that Policy C17 should be deleted from the plan and that future attention should focus instead on securing appropriate re-use of existing buildings within the current developed footprint, consistent with the conservation objectives of the Kent Downs National Landscape.

Policy W4 – Brooklands Farm

Although Policy W4 – Land at Brooklands Farm is not subject to specific consultation at this stage, CPRE Kent consider it necessary to update our previous representations in light of the now-submitted planning application for the site (CA/25/00779). The existence of this application has provided a clearer and more detailed understanding of what development here would entail and, in doing so, has confirmed that the serious concerns we raised previously remain wholly unresolved and are in fact amplified rather than addressed.

The detailed plans and accompanying assessments demonstrate that the site continues to be fundamentally unsuitable for development. Significant areas remain at risk of flooding, with parts of the site lying within Flood Zones 2 and 3 and subject to surface water constraints. The ecological sensitivity of the land is also confirmed beyond doubt, with the Convict Wood Local Wildlife Site running directly through it, together with areas of Ancient Woodland and Priority Habitat. These are irreplaceable environmental assets that cannot be mitigated through design or buffer planting. The site's location within the Area of High Landscape Value, its contribution to the rural character of the Chestfiel-Blean corridor and its proximity to several listed buildings all underline the incompatibility of large-scale housing here. Equally, the highway proposals submitted with the application only

reinforce earlier concerns about access via narrow rural lanes, the need for intrusive road widening and the additional traffic that would be funnelled through Blean Woods towards Canterbury.

On this basis, CPRE Kent maintain our objection to Policy W4 and urge that the site be deleted from the plan at the next stage.

Policy DS25 (Renewable Energy)

Although Policy DS25 (Renewable Energy) is not being consulted upon as part of this focused Regulation 18 stage, CPRE Kent consider it appropriate to update our previous comments in light of continuing public concern and recent experience both within Canterbury and elsewhere in Kent. The current draft remains weak and overly permissive, giving disproportionate weight to the scale of energy generation without sufficient safeguards for the protection of landscapes, agricultural land or biodiversity. As we have seen in neighbouring authorities such as Ashford, there is growing recognition that the benefits of renewable energy must be properly balanced against the irreversible harm caused by large-scale schemes on sensitive or high-quality land. While national policy rightly seeks to expand renewable generation, it also expects local plans to direct development to the most appropriate locations and to protect valued landscapes, heritage and the best and most versatile farmland. We would therefore expect Policy DS25 to be strengthened at the next stage, ensuring that energy yield is not treated as an overriding consideration and that decision-makers are explicitly empowered to refuse proposals where environmental or landscape harm would be significant, consistent with the intent of Policy DS12 and the principles of sustainable development.

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We are required to publish the responses we receive, including your name and the name of the organisation, body or person you are representing. Please do not include information in your comments unless you are happy for it to be published. We may also share your data with the Planning Inspectorate.

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You also have the right to object to our processing of your personal data.

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Canterbury City Council, 14 Rose Lane, Canterbury, Kent CT1 2UR. Phone: **01227 862 000**. Web: canterbury.gov.uk

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Thank you for taking the time to respond to this consultation

