



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: [REDACTED]
fax: [REDACTED]
email: [REDACTED]
web: www.iceniprojects.com

Planning Policy Team
Canterbury City Council
Council Offices,
Military Rd,
Canterbury
Kent
CT1 1YW

21st October 2025

SI/OR/24-183
BY EMAIL

Dear Sir/Madam,

**REPRESENTATION TO THE CANTERBURY DISTRICT LOCAL PLAN REGULATION 18
FOCUSED CONSULTATION IN RESPECT OF LAND NORTH OF HOLLOW LANE, CANTERBURY
(FORMER ALLOCATION POLICY C7)**

Iceni Projects, on behalf of Pentland Properties Ltd, welcomes the opportunity to submit representations to the Canterbury District Local Plan (Focused Regulation 18 Consultation).

Pentland Properties strongly encourages the re-instatement of Land north of Hollow Lane as an allocation within the emerging Local Plan, formerly allocated as Policy C7 within the previous Regulation 18 Local Plan consultation. The Council's evidence base indicates that the site has been removed due to concerns over the access to the site. However, these representations address that issue and confirm definitively that an appropriate access strategy exists.

There are significant sustainability benefits to land north of Hollow Lane being included within the wider South West Canterbury Strategic Development Area (SWC SDA) to deliver a wider residential-led mixed-use development. This includes the provision of a number of enhanced social, economic and environmental benefits through a well-planned comprehensive approach. The re-inclusion of the Policy C7 site alongside Merton Park, in addition to new development coming forward at Cockering Road will enhance this strategic development area.

The site was previously submitted as part of the Call for Sites process, and representations were subsequently made during the 2024 Regulation 18 consultation. The information submitted as part of these previous representations should be read in conjunction with this submission, which further advocates for the inclusion of the site as part of the draft allocation.

Subsequently these representations are supported by:

- Illustrative Masterplan (October 2025) prepared by Sten Architecture;
- Canterbury Local Plan Evidence Vol 1 – Sustainable Transport Strategy (ref: 22-022-015 Rev C) prepared by C&A; and
- Canterbury Local Plan Evidence Vol 2 – Traffic Impact Assessment (ref: 22-022-016 Rev B) prepared by C&A.

Pentland Properties is willing to positively engage with the Council to demonstrate the site's deliverability, and will support the Council to provide the necessary evidence base in order to identify the site as suitable for housing growth. They wish to work closely with CCC and other key stakeholders (notably KCC) following this Focused Regulation 18 consultation ahead of the submission version of the Plan being finalised. Pentland Properties would particularly welcome the opportunity to engage in respect of the access proposals, as these are noted as the reason for the site no longer being allocated, however no previous opportunity was provided by the Council to engage on this matter.

a. Housing need and Plan Period

Pentland Properties continues to support the provision of Canterbury as the main focus for growth.

It is noted within paragraph 7.15 of the Topic Paper (August 2025) that the draft Local Plan, including all housing land supply components, provides 25,354 dwellings against the need for 23,085 dwellings, providing a margin of 9.8% across the draft Local Plan. Pentland Properties support the Council in this regard, noting that the draft Local Plan accords with the up to date Standard Method figure of 1,215 dwellings per annum (dpa). This accords with NPPF paragraph 62.

It is important to highlight that land north of Hollow Lane accords with the spatial strategy that seeks to focus new development in sustainable locations close to the city. In this context, the site should be supported to come forward in preference to less sustainable alternatives or those adjoining settlements lower in the settlement hierarchy. Given the access issues that are addressed through this representation, the Council should reconsider the allocation of the site as an appropriate extension of Canterbury that aligns with the strategic principles set out within the draft Local Plan. The Council should ensure that they are satisfied that sites identified to meet their need are deliverable and developable, and Pentland Properties wish to continue engagement with the Council to evidence this in accordance with NPPF Paragraph 36.

Pentland Properties do note that local housing need targets are a minimum (Paragraph 62 - NPPF), and Canterbury can and should ensure there is suitable flexibility in their supply to meet this. Where it is possible for the Council to identify additional land in sustainable locations, this should be supported. Similarly, noting Canterbury's underperformance in respect of delivery in recent years (most recently 67% in the 2023 Housing Delivery Test), the Council should identify sites that have been demonstrated to be deliverable, such as this site here to deliver housing.

Pentland Properties support the inclusion of the revised plan period up to 2042/43 to be in accordance with the minimum 15 year period as required by the NPPF (Paragraph 22), with an expected adoption of Winter 2027. Given previous delays with the Local Plan process, we would expect this to be updated in the event of any further delay to the Local Plan process.

b. The site & South West Canterbury Strategic Development Area

The SWC SDA has been updated to remove land north of Hollow Lane (former Policy C7) as an allocation. The SWC SDA offers the most logical area of wider growth to Canterbury, and provides a more comprehensive benefit when Land north of Hollow Lane is included, offering a clear opportunity to deliver a genuinely sustainable extension to Canterbury.

The site is currently allocated for development within the adopted Local Plan (2017) as part of the Cockerling Farm allocation (SP3 Site 11), albeit the site was not brought forward as part of the Cockerling Farm outline planning application (CA/17/00519). As a starting point, this in itself is a strong reason for its continued inclusion within the Local Plan, considering it has been considered at examination previously and found to be a sound location for housing. Similarly, the site still remains as a clearly suitable location and accords with the spatial strategy principles set out within the draft Local Plan.

During the previous Regulation 18 consultation, the logic of promoting the SWC SDA is clear – *“The strategy for Canterbury is to consolidate growth on the southern side of the city, to integrate with planned growth at the 2017 strategic sites at South Canterbury and Cockerling Farm.”* The ability to provide clear sustainable connection links in area of existing growth provides genuine opportunity to

deliver a mode shift at significant scale. The removal of Policy C7 is considered to be a missed opportunity by the Council, given that it can help consolidate growth and build on existing and emerging investment for growth in this location.

To be sound, spatial strategies must be informed throughout their preparation by a sustainability appraisal, as stated in Paragraph 33 of the NPPF. The 2025 Sustainability Appraisal confirms that Canterbury is the most suitable location for the principal focus of development in the district. Canterbury remaining as the focus for development is consistent between the previous and current draft Local Plans, and the SWC SDA accords with this strategy, therefore confirming that where this representation demonstrates that land north of Hollow Lane continues to be deliverable, it should be reinstated as an allocation to align with these findings, and ultimately support the overall intention to deliver sustainable development in line with NPPF paragraph 11.

The land identified under Policy N1 & former Policy C7 is being brought forward by two local established housebuilders, both renowned for delivering high quality developments. It can be expected that the high development standards associated with both groups will deliver an attractive extension to the city, both in visual terms, but also for future residents to live. Pentland Properties continue to work alongside Quinn Estates in regards to the Policy N1 site, and maintain a good working relationship such that delivery of the SDA can be provided in a co-ordinated and timely manner.

c. Re-allocation of Land north of Hollow Lane

The justification for the dropping of the site is not considered to be evidence-based. The Focused Regulation 18 Topic Paper provides some reasoning, but there is no evidence in respect of any constraints that are fundamental to the delivery of the site. The Topic Paper states: *“Land to the north of Hollow Lane (SLAA259) is no longer considered suitable for allocation due to concern regarding highway impact and the ability to achieve suitable access, as set out in the SLAA (2025).”* There is also commentary in relation to the developers of the Cockerling Farm development, who have highlighted that they approved plans in relation to access, which would need to be amended to allow for the delivery of the link road. The Topic Paper then states that *“No evidence has been presented by the site promoter to demonstrate an alternative suitable access strategy”*, albeit no dialogue was sought to address this.

Within the SLAA (August 2025) Appendix B, the Council conclude that the site is not suitable as *“there are concerns regarding highway impact and the ability to achieve suitable access”*, but the same SLAA table states in relation to access that *“...access needs to be considered alongside this existing allocation [Cockerling Farm], and is likely achievable.”* A suitable access **is** achievable, and in response to the comments set out within the Focused Consultation, we have provided a full suite of technical highways work appended to these representations that demonstrates that access is achievable and therefore that the site can be considered as deliverable. A summary of this work is set out below.

Given the site has a suitable access strategy and does not give rise to any unacceptable highway impacts, the site can therefore be considered deliverable in transport terms. It is then important to recognise that the proposal offers a number of key benefits, including the consolidation of planned growth associated with Cockerling Road and Merton Park in the SWC SDA, thereby supporting a coordinated and comprehensive approach to development in this part of Canterbury. The site represents a highly sustainable location, being well related to Canterbury and its range of shops, services, and transport connections. This aligns with the Council's preferred spatial strategy, which seeks to focus new development in sustainable locations close to the city. In this context, the site should be supported to come forward in preference to less sustainable alternatives or those adjoining settlements lower in the settlement hierarchy.

Transport

To support this representation, C&A have prepared further transport and highways evidence. This is in two parts:

- Volume 1 updates the Sustainable Transport Strategy. In light of the updated NPPF and updated Local Plan, this document sets out the vision for how people will travel to, from and

within the site and the measures to make this travel as sustainable as possible. It focuses on the specifics of the Sustainable Transport Strategy for the site, in line with a similar strategy which C&A produced for site C6 (now site N1).

- Volume 2 updates the Traffic Impact Assessment. This report provides a Traffic Impact Assessment of the Land at Hollow Lane site, cumulatively with the proposed development at Merton Park (Site N1). The assessment results are compared against a scenario where neither development is delivered. This scenario tests the resilience of the network to cumulative impact of the two developments, in the context of a wider transport strategy that now excludes major highway infrastructure such as the South West Canterbury link or new/relocation slip roads at Merton Park.

The additional access work submitted as part of this representation demonstrates, beyond doubt, an alternative access strategy that does not rely on the link road. This work had been prepared in anticipation of submission to the Council, albeit there had been no forum to submit this information prior to this focused consultation and the changing of sites. We note that the East Canterbury SDA, previously dropped from the draft Local Plan and now reallocated, was initially dropped on the basis of its transport strategy. In the intervening period it is clear that further consultation and engagement has been undertaken, resulting in an amended access strategy which has proved decisive for the Council to reallocate the scheme. It appears other sites have also been given the opportunity to provide additional highways access information since previously being dropped as an allocation ('Land at Rattington Street, Chartham – Policy N32'). Pentland Homes were not afforded the same opportunities by the Council as these other proposed sites, to the direct detriment of this site's allocation.

Within the 2025 Sustainability Appraisal (SA) Report (Appendix G), it is noted that the site is scored for "*significant negative effects on transport highways (large-scale car dependent development with concerns over highways impact and whether suitable access can be achieved)*". The table then goes on to state "*Mitigation is likely to be required. A Transport Assessment is needed to determine impacts on the highway network and demonstrate that the access arrangements for Cockerling Farm (Site 11 Policy SP3) are able to accommodate additional traffic.*" Active travel improvements achieved through the wider SDA mean that the development is not car dependent, a fact recognised within the SA scoring for Merton Park (Policy N1). Similarly, the 2022 SLAA found for the site that "*Pedestrian and cycle permeability is expected to be good through the current strategic allocation*" Secondly, the SA seems to recognise that further transport information is necessary, yet this work has not previously been undertaken. This therefore returns to the principle that the decision is not evidence-based, lacking evidence to underpin the decision taken. In order for plans to be found sound, they must be justified, based on an appropriate strategy and based on proportionate evidence (Paragraph 36 – NPPF). Currently, the positions reached by the Council are based on anecdotal evidence, and have not provided the opportunity for further evidence to be provided to allay perceived, unsubstantiated, issues.

In respect of the Chartham site mentioned (Policy N32), it is noted within the 2025 SA for scoring highly against transport and scored significantly worse compared to the site at Hollow Lane, with Chartham set to take on a significant amount of growth relative to its size. When considering Canterbury as the focus for growth within the District, it is unclear why such a position has been reached by the Council, without seeking the necessary evidence to align with the preferred spatial strategy and previously consulted on approach to growth. It is a fundamentally flawed position taken by the Council to conclude that a site in Chartham could score more highly within the SA than a site located on the edge of Canterbury, particularly noting Policy C7 is located within an identified Strategic Development Area that is a focus area for growth in the city. In light of the updated highways information that confirms definitively that an appropriate access strategy exists, the Council should reconsider their conclusions.

Heritage

It is noted that since the previous consultation, comments have been received from Historic England in respect of the allocation. Pentland Properties have been engaging with the Council as a result and have provided information to refine the allocation requirements on this basis, again to allay the perceived concerns regarding the deliverability of the Site.

Phasing

In respect of a timeline for the application and subsequent phasing, Pentland Homes envisages the following timescales, taking into account the timescales for development coming forward at Merton Park:

Application submission	Approval	Submission of 1st phase Reserved Matters	RM Approval	Start on site	First Occupations	Build out
Autumn 2027	Summer 2028	Winter 2028/Early 2029	Autumn 2029	Early-mid 2030	Spring 2031	100-120 dwellings per year build out, with completion by 2040. →

d. Summary and Conclusions

Pentland Properties disagrees in the strongest terms with the exclusion of Policy C7 from the SDA, and argue that it should be reintroduced to deliver additional benefits to the South West Canterbury SDA, following the submission of the appended transport evidence which demonstrates the site is deliverable. Pentland Properties fundamentally disagree with the findings of the SA, and emphasise the sites sustainability in tandem with the wider SWC SDA and accordance with the principles of the spatial strategy set out in the draft Local Plan.

Pentland wish to work closely with the Council and other key stakeholders (notably KCC) following this Focused Regulation 18 consultation ahead of the submission version of the Plan being finalised. Pentland would particularly welcome the opportunity to now engage in respect of the access proposals, and are willing to work with the Council etc. to engage upon the updated evidence to support an allocation at the site.

Should the Council wish to discuss any or all of the issues raised in these representations, please do not hesitate to contact me.

Yours sincerely,



Oliver Ricketts
Senior Planner