

Friday 17th October 2025
665/A3/JJAPlanning Policy - Consultations Team
Canterbury City Council
14 Rose Lane
Canterbury
CT1 2UR**By Email Only**
consultations@canterbury.gov.uk

Dear Sirs

**Re Draft Canterbury District Local Plan - Focused consultation (Regulation 18) September 2025
Representations on behalf of Catesby Strategic Land Ltd,**

I write with reference to the above. I act for Catesby Strategic Land Ltd, who have an interest in the land at Heymar, Whitstable Road, Herne Bay, CT6 8BL (SHLAA site ref 305).

We note that the councils web site is clear in that the Draft Canterbury District Local Plan - Focused consultation (Reg18) September 2025 is inviting feedback on four key areas:

- 'The New draft site allocation policies
- The Changes to existing strategic site allocations
- The Gypsy and Traveller draft policies and allocations
- The Impact of the December 2024 National Planning Policy Framework (NPPF) changes on Canterbury District'

It is this latter point we wish to comment upon. In doing so we also note that section 1 of the Focused consultation (Reg 18) makes it clear that the plan period of the new Local Plan is proposed to be 2024/25 to 2042/43, which assuming adoption in winter 2027 would give a clear 15 year plan period in accordance with para 22 of the NPPF; and that the Local Housing Need (LHN) for the district now stands at 1,215 dpa – hence the additional allocations now being put forward.

1 The Housing Requirement, Supply and Trajectory

1.1 Local Housing Need and the Minimum Housing Requirement

1.1.1 As the Council has correctly identified in the Draft Plan the starting point for determining the Local Housing Need ("LHN") is the Government's Standard Method. The figure of 1,215 dpa¹ reflects the Standard Method figure applicable at this moment in time and therefore accords with the advice set out in the PPG².

1.1.2 Before commenting on the housing land supply, it is important to note that the LHN figure is a minimum starting point, and it does not produce the Housing Requirement³.

1.1.3 The PPG⁴ goes on to advise that the housing requirement is the '*minimum number of homes that a plan seeks to provide during the plan period*'; and that '*Once local housing need has been*

¹ See para 1.9 and 2.9 of the Focused consultation (Regulation 18) September 2025

² Housing and Economic Needs Assessment section of PPG - Paragraph: 008 Reference ID: 2a-008-20241212 Revision date: 12 12 2024

³ Housing and Economic Needs Assessment chapter of the PPG – Paragraph: 002 Reference ID: 2a-002-20241212 Revision date: 12 12 2024

⁴ Housing and Economic Needs Assessment chapter of the PPG – Paragraph: 040 Reference ID: 2a-040-20241212 Revision date: 12 12 2024

assessed ... authorities should then make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.' To this end the PPG advises that: *'The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.'* My emphasis.

1.1.4 In the context of the above we note that the focused consultation is not looking to identify a housing requirement above that proposed by the standard methodology and does not appear to address the issues identified in the PPG as to why an uplift in the LHN figure may be appropriate. Rather, the Sustainability Appraisal (SA) Report (2025) at para 5.2.20 merely states: *'The PPG clearly identifies that the NPPF expects local authorities to follow the standard method to assess housing needs and that it is the minimum figure to inform the housing requirement in the local plan. There is currently no robust evidence to justify planning for an alternative higher figure as a plan requirement and include a 10% or 20% uplift to the mandatory standard method figure as proposed under the alternative options. The level of growth required under the standard methodology will help facilitate affordable housing, infrastructure and employment growth and provide a substantial uplift on recent housing completions in the district.'* With para 5.2.21 continuing: *'Additionally, none of the alternative options were considered to perform any better in sustainability terms than the preferred option.'* This does not in our opinion explain the rationale for not considering a higher requirement, especially in light of the findings of the Housing Needs Assessment Update of July 2025, and in the context of the Duty to Cooperate and unmet needs across the region, both of which we consider below.

a) Affordability

1.1.5 Whilst affordability is factored into the standard method, we note, when looking at the ONS 'House Price to Workplace-Based Earnings Ratio - March 2025' that the ratio of median house price to median gross annual workplace-based earnings by local authority district, England and Wales, 1997 to 2024 indicates that the ratio of median house price to median gross annual workplace-based earnings in Canterbury has increased over the past 10 years from 8.85 to 9.55⁵, the average for Kent being 9.58⁶, and the average for England being 7.71⁷. Whilst the above alone may not suggest a need for an increase in the LHN figure per se, the affordable housing need as evidenced by the Housing Needs Assessment Update of July 2025 indicates at para E12 that the latest *'analysis indicates an annual affordable housing need of approximately 695 units, with an 80% share (558 units) allocated to social and affordable rental housing and 20% (137 units) to affordable home ownership'*; which equates to 57% of the total LHN⁸. On this basis, and as the Council are proposing an affordable housing policy requiring 30% onsite provision, which will only be triggered for those sites that meet the qualifying criteria, it is clear that the affordable housing need will not be met. Indeed table 7.6 of the Focused Regulation 18 Topic Paper makes this very point, when it suggests an outstanding affordable housing requirement, after completions, commitments and allocations, of 6,752 dwellings at the end of the plan period.

⁵ ONS House price to workplace-based earnings ratio – March 2025 – table 5c <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

⁶ Table 3c

⁷ Table 1c

⁸ $695 / 1,215 \times 100 = 57.20\%$

1.1.6 Given the decreasing trend in terms of affordability set out above, the gross affordable housing need of 695dpa is highly likely to increase over the plan period, leading to an increase in the net shortfall and in turn a higher number of people in need and on the Council's housing waiting list.

1.1.7 In the context of the above we note that according to table 4.1 of the Authority Monitoring Report 2023-24 (AMR) (Dec 24)⁹ 248 affordable homes were completed in 2023/24, the average over the past 5 years being just 149 affordable homes. This is clearly well below the annual requirement set out in the Housing Needs Assessment Update of July 2025, and does in our opinion demonstrate the need for an uplift to the LHN figure to boost the supply of open market and affordable homes and thus help address the affordable housing needs of the district.

1.1.8 Reviewing the LHN in light of the above would also reflect one of the key strategic objectives of the Plan - to *'Provide affordable high-quality housing for people at every stage in their lives.'*

b) The Duty to Cooperate and Unmet Housing Needs

1.1.9 The Draft Canterbury District Local Plan - Focused Consultation (Reg 18) September 2025 does not comment upon the Duty to Co-Operate. Para E4 of The Focused Regulation 18 Topic Paper advises that Chapter 3 of said document identifies the steps taken to meet the Duty to Cooperate requirements through the development of the new Local Plan to date. Chapter 3 at para 3.4 suggests that *'As part of the preparation of the Focused Regulation 18 draft Local Plan, Statements of Common Ground have been discussed with and circulated to each of the neighbouring LPAs. The statements outline the relevant cross-boundary strategic issues and identify the progress and status of each issue – whether an agreement has been reached or whether cooperation remains ongoing.'* Para 3.6 goes on to advise that *'The Duty to Cooperate Compliance Statement (2024) provides evidence that the DtC has been satisfied. The Compliance Statement will be updated and published alongside for the Regulation 19 draft Local Plan early next year. A list of Duty to Cooperate meetings from April 2024 to July 2025 can be found in Appendix I.'*

1.1.10 In the context of the above we note that the Duty to Cooperate Compliance Statement (2024) pre dates the current Local Plan focused consultation and the amendments to the NPPF and thus the implications of the latest LHN figures for each of the adjacent authorities. Furthermore, we also note that the Statements of Common Ground (SoCG) with the adjacent authorities, whilst dated August 2025 are not necessary an agreement of the relevant authorities position on the matter of the housing requirement and housing land supply as at August 2025. For example, the SoCG with Ashford BC on pages 2 and 3 makes it clear that the position on the Housing Market Area and the position on Meeting Housing Needs was agreed in August 2021 and March 2021, respectively. Likewise, the position on the Housing Market Area and the Meeting Housing Needs with Swale BC as agreed in May 20021, as was the position with Folkestone and Hythe; whilst that with Dover DC was agreed in Marsh 2021. All pre date the changes to the NPPF in December 2024 and the updated basis for assessing the LHN, which in the majority of these cases has increased, as set out in the table below.

⁹ See web link: <https://docs.canterbury.gov.uk/files/adopted-local-plan-evidence-base/authority-monitoring-reports/2023-2024/>

Region	LHN under the previous standard method	LHN under the new standard method	Difference
Canterbury	1,141	1,216	+75
Ashford	997	952	- 45
Dover	559	746	+187
Folkstone and Hythe	735	859	+124
Swale	1,040	1,048	+8

1.1.11 To blithely say that ‘*It is agreed that each party will meet its own housing needs*’ is we consider slightly disingenuous given the change in circumstances. To put this into perspective the scale of the difference between the previous and new standard method figure equates to 349 dwellings across all five authorities, 274 when you discount Canterbury, which is circa 22.5% of CCC annual LHN of 1,215dpa.

1.1.12 Having regard to the above and having reviewed the Focused Regulation 18 Topic Paper, and the SA it would appear that nowhere is the current level of unmet need quantified. Indeed, both documents are silent on this matter. The SA does however assess 2 alternative options for growth, to the preferred option, the LHN of 1,215dpa (23,085 new dwellings over the period 2024/25 - 2042/43); one being a 10% increase in the LHN i.e. 1,337 dpa (25,394 dwellings over the LP period 2024/25 - 2042/43); and the other a 20% increase in the LHN i.e. 1 1,458 dpa (27,702 dwellings over the LP period 2024/25 - 2042/43). All three options have comparable scores against the SA objectives other than in terms of waste management, heritage, housing, land use, and health and sustainable communities. Whilst the greater impacts in terms of waste are attributed to the higher amounts of development being likely to be significant, the impacts with regards to health and sustainable communities are said to be uncertain, and the difference in terms of heritage and land use is not explained; the difference in terms of housing delivery itself is put down to there being ‘*greater uncertainty over the ability to deliver the housing, given the much lower rates of completed development than this experienced in the district in recent years*’; which is we believe somewhat disingenuous when the lack of delivery has been down to the issues associated with Covid and of nutrient neutrality and how to address the latter – not a slowing down of the market or lack of demand/ interest in delivery from the housing building industry.

1.1.13 Whilst no doubt the position on unmet need will continue to evolve it nonetheless needs to be subject to an updated evidence base at Reg 19.

c) Conclusions on the Housing Requirement

1.1.14 Whilst recognising that the Council has worked from the correct starting point, which is the minimum annual LHN calculated by reference to the Standard Method i.e. 1,215 dpa, the PPG is clear in that the LHN is only the starting point.

1.1.15 There are a range of factors relevant to the calculation of the housing requirement for the Draft Plan that the Council needs to consider when arriving at its overall housing requirement. These include:

- The inherent lack of affordability and the increasing affordability ratios; and
- The low levels of affordable housing delivery, and attendant increasing need for affordable homes.

1.1.16 When these factors are properly scrutinised, they demonstrate clear and rational reasons as to why there should be an uplift to the LHN. This is compounded by the issue of unmet housing needs within the wider region.

1.1.17 Having regard to the above Catesby believe that in order to ensure the Local Plan is soundly based, at the very least the plan should set a housing requirement 10% above the LHN. This would lead to an annual housing requirement of **1,337 dpa (25,394 dwellings over the plan period 2024/25 - 2042/43)** i.e. some 122dpa more than currently planned for (2,309 more dwellings over the plan period). Setting the housing requirement at this level would significantly improve the affordability situation within the District as it would help deliver more affordable homes for those members of the community in the most need. It would also help address the unmet housing needs of the wider housing market area. Whilst the plan appears, as set out in the table below, to have a supply of 25,430 dwellings and thus should be able to deliver a 10% buffer, this is not what it currently plans for, and in our opinion should if it is to be soundly based and in accordance with national government guidance.

2 Housing Land Supply

2.1 The Focused Regulation 18 Topic Paper (August 2025) sets out the components of the councils housing land supply, which having regard to Table 7.3 can be summarised thus:

Components of supply	Dwelling numbers	Notes
Completions 24/25	950	
Extant planning permission	1,720	997+475+248
Carried forward 2017 Local Plan allocations	10,586	
Draft New Allocations	9,747	9130 +248 +369
Windfalls	2,599	
Total	25,358	24,406+950

2.2 Whilst this figure differs slight from that set out in the table below – which is taken from the information contained in the Draft Canterbury District Local Plan - Focused Consultation (Reg 18) September 2025, we do feel that without a clear evidence base on deliverability of all the component parts of the housing land supply¹⁰ 100% reliance on all current commitments (existing allocations and permissions) is not justified and a 10% buffer should be introduced to allow for non-delivery/ slower than expected delivery. Likewise, whilst the proposed housing sites may deliver the quantum proposed within the plan period, this is subject to all of said sites being found acceptable by the Local Plan Inspector, such that a contingency may be sensible; and finally, the proposed windfall allowance is not based on a credible evidence base and is not justified. At over 11% of the overall requirement¹¹ and nearly 13%¹² of the residual requirement, it is a significant part of the overall supply and needs to be reviewed to ensure a realistic approach is adopted at Reg 19.

2.3 In the context of the above we note that para 7.19 and table 7.4 of the Focused Regulation 18 Topic Paper (August 2025) suggests the council have a 5 year Housing land supply. Whilst not explicit within the Topic Paper it is clear when looking at this calculation that it is based on the Liverpool method of spreading any shortfall that might arise over the plan period. There is no justification given for this approach. We believe the plan should adopt the Sedgefield method as set out in PPG. If they did then the current 5 year HLS would be 4.93yrs, and not the 5.15. yrs. suggested in table 7.4 of the Focused Regulation 18 Topic Paper.

¹⁰ At present only statements on the existing strategic allocations are provided

¹¹ $2,599/23,085 \times 100 = 11.25\%$

¹² $23,085 - 950 - 1,720 = 20,415$. $2,599/20,415 \times 100 = 12.73\%$

Components of Equation	Dwelling Numbers	Notes
Local Plan requirement 2024/25 - 42/43	23,085	1,215 x 19
Completions from 01/04/24 to 31/03/25	950	
Total expected completions 1/4/25 – 31/03/27	2,301	3251-950
Shortfall 01/04/24 to 31/03/27	394	1,215x 3 – 3,251 (950+2,301)
5 year requirement 1/4/2027-31/3/2032	6,075	1,215x5
Plus, shortfall from Shortfall 01/04/24 to 31/03/27	6,469	6,075+394
20% buffer	1,293	6,469x20%
Overall, 5 yr. requirement	7,762	
Annual requirement	1,552	7,762/5
Components of 5-year supply from 01/04/25 to 31/03/30		
Strategic and other new allocations	4,806	
New allocations in draft Local Plan	1,042	
Planning permissions	684	
Windfall allowance	729	
Students	317	
Care homes	42	
New care home allocations in draft Local Plan	37	
Total 5 year supply	7,659	
District-wide 5 year supply	4.93	7,659/1,552
Deficit	-103	7,659-7,762

2.4 This would suggest the need to allocate additional smaller – medium sites – i.e. 20 – 200 dwellings – that can come forward with immediate effect to help address the shortfall. It also suggests that the ‘over supply’ of 2,345 dwellings currently proposed should, at 10% of the residual requirement,¹³ be the minimum the Plan should be looking to deliver to address our concerns about the commitments and windfalls. Anything less would mean the plan would be incapable of accommodating any fluctuations in the market/ improving the prospect of delivering the minimum housing need.

2.5 The above is in our opinion compounded by the issues surrounding Nutrient Neutrality and current moratorium on housing coming forward on sites within the River Stour catchment/ Stodmarsh lakes designated sites. Whilst we understand the council has started to promote a credit based approach to allow housebuilders to acquire credits to justify/mitigate new housing in these areas, we

¹³ $23,085 - 950 - 1,720 = 20,415$. $2,345 / 20,415 \times 100 = 11.48\%$

do not know whether this will work or what level of take up will happen. We also do not know how many credits are and will be available. In addition, the Council's other accepted solution is for sites to have their own privately managed packaged treatment works. Again, there cannot be a one size fits all approach by requiring housing schemes to promote private packaged treatment works and some sites may be too small or not be viable enough to deliver these. The net effect of the above is that Nutrient Neutrality has caused significant delays in housing delivery in the affected areas and there remains some uncertainties about universal mitigation. It is thus sensible to look to allocate sites which are not restricted by Nutrient Neutrality/ don't need to use up vital credits and can be delivered without delay. Land at Heymar can drain to Swalecliffe Waste Water Treatment Works which does not discharge into the Stour Valley and as such help deliver in the shorter term, thus helping to also address the 5 yr housing land supply situation highlighted above.

3 The Spatial Strategy

3.1 In supporting the spatial strategy, with Canterbury Urban Area seen as the principal focus for development in the district, Whitstable and Herne Bay Urban Areas as the secondary focus, and proportionate development in the Rural Service Centres, we note when looking at the distribution of growth proposed in the Draft Canterbury District Local Plan - Focused Consultation (Reg 18) September 2025 – see below - that the scale of development proposed at both Whitstable and Herne Bay is comparable to that proposed to come forward in windfalls. This does not in our opinion reflect the aspirations of the plan and we would suggest that given the scale of development put forward in Herne Bay that the council reviews its position and the merits of additional allocations in this area, such as that being promoted by Catesby on land at Heymar, Whitstable Road, Herne Bay. Additional development in this area could further the councils' aspirations for further infrastructure provision locally and provide for a more coordinated approach to infrastructure delivery than occurs through ad hoc windfalls.

	Existing LP strategic allocations	Existing LP further allocations	2024 retained allocations	2025 further allocations	Total	% of overall total ¹⁴
Canterbury	7,137 ¹⁵	491 ¹⁶	1,391 ¹⁷	4,679	13,698	53.86%
Whitstable	575	24 ¹⁸	1,880	226	2,705	10.63%
Herne Bay	2,554	349 ¹⁹	240	351	3,494	13.73%
Rural areas		79	778	373	1,230	4.83%
Total allocations	10,266	943	4,289 ²⁰	5,629 ²¹	21,127	
Net allocations	10,266	943	4,161	5,425	20,795	
Other planning permissions					2,036	8.00%
Windfalls					2,599	10.22%
Total					25,430	
Requirement					23,085	
Surplus					2,345 ²²	10.15%

¹⁴ NB adds up to over 100% given issues of netting.

¹⁵ 310 at Ridlands Field Canterbury pending an application.

¹⁶ 201 on various sites in Canterbury pending an application.

¹⁷ Includes 1000 on Wincheap commercial area (C19)

¹⁸ 17 at Tankerton car park and 7 at middle row pending an application.

¹⁹ 35 at Herne Bay station pending an application.

²⁰ Netted down to 4,161 by applying the government ratios to older persons housing.

²¹ Netted down to 5,425 by applying the government ratios to older persons housing.

²² It is noted that those sites allocated in the adopted LP amount to some 563 dwellings and thus reduce the surplus to 1,782 i.e. 7.7%.

3.2 Within the context of the above we note the reason behind the council rejecting the land at Heymar, Whitstable Road, Herne Bay for development, is according to the SLAA (Aug 2025) related to its being located in the Green Gap between Herne Bay and Whitstable. The landscape assessment undertaken by LDA Design and included within Catesby's call for sites submission in December 2024 carefully considers the contribution the site makes to the surrounding landscape character and the function it plays as part of the Green Gap between Herne Bay and Whitstable, and concludes that *'while the proposed development would reduce the extent and size of the Green Gap between Herne Bay and Whitstable, development can be accommodated within the Site without undermining the purpose and function of the gap.'* Indeed, it suggests that:

'Assuming the above recommendations are adhered to, the proposed development would:

- *Not significantly affect the open character of the gap, adjoining the existing settlement area; retaining a large proportion of the Site as undeveloped, green infrastructure; and providing a more clearly defined settlement edge.*
- *Not appear isolated or obtrusive within the countryside, adjoining the existing settlement area and integrated with new planting.*
- *Not result in any physical coalescence, with proposed open space contributing to a clearly recognisable gap between Herne Bay and Whitstable.'*

3.3 The following plan was submitted as part of the representations, and illustrated the potential design response and ability to maintain a green gap between Herne Bay and Whitstable:



3.4 This form of development would in our opinion 'round off' the settlement edge, creating a new publicly accessible parkland on the edge of the urban area that would actively address one of the

key objectives of the local plan review i.e. to create a 'thriving environment' where '*Significant new areas of accessible, high quality open space will be created across the district and both new and existing valued open spaces enjoyed by the district's residents will be protected for future generations, ensuring continued access beyond the period of the plan.*'

3.5 In the context of the above we note that Policy HB4 - Land to the west of Thornden Wood Road (SLAA site 240) is located wholly within the Green Gap between Herne Bay and Whitstable and that its development would also conflict with the adopted 2017 Local Plan (Policy OS7), but was included as a draft allocation in the draft Local Plan (2022) and (2024) for a new secondary school for Herne Bay and the coastal area, with supporting residential development given the need for increased secondary school provision to support growth in the new Local Plan and the current imbalance in the location of secondary school provision across the district, with many pupils from the coastal area travelling to schools in Canterbury. We also note that Policy HB6 - Hawthorn Corner (SLAA site 167) was, when it was assessed in the SLAA (2022), considered technically unsuitable for development, but was nonetheless put forward as an employment allocation in the March 2024 plan.

3.6 Given the above we would ask that the Council review their position on the land at Heymar, Whitstable Road, Herne Bay, and look to allocate this site for the circa 175 dwellings and countryside open space promoted by Catesby.

4 Conclusions on Focused Consultation (Reg 18) September 2025

4.1 Whilst we recognise the fact that in calculating their housing requirement the Council has worked to the correct starting point which is a minimum annual LHN calculated by reference to the standard method of 1,215 dpa, we are concerned that the scale of growth proposed in the Reg 18 Focused consultation Plan is the minimum needed to meet the LHN. No regard seems to have been had to increasing this to address the affordability issues that prevail in the area, the affordable housing needs of the area, and the issue of the unmet needs of the wider area / the DtC surrounding. As set out above we believe that given these issues the plan should set a housing requirement 10% the LHN.

4.2 Similarly we are concerned about the lack of evidence underpinning the housing supply and the extent to which a 10% buffer needs to be provided for so as to address any potential for delays in delivery/ non delivery. The deliverability of the existing commitments needs to be demonstrated more evidentially than it has to date. Likewise, the evidence needs to be provided to demonstrate that the proposed allocations will deliver the quantum of development suggested when expected; and the plan needs to encompass compelling evidence to support the windfall rates expected rather than rely on historic trends. More evidence also needs to be provided to demonstrate how a rolling five year housing land supply will be achieved, and the current 5 year supply reviewed in light of the fact we can see no justification for the council's use of the Liverpool method in calculating their 5 yr housing land supply.

4.3 Turning to the spatial strategy, whilst supporting this in principle, we do believe that additional sites could be delivered in Herne Bay to help address the issues we have raised with regard to the housing requirement and housing supply. To this end we remain of the view that the land at Heymar, Whitstable Road, Herne Bay should be allocated for the circa 175 dwellings and countryside open space. We believe that the development of this site can come forward in a timely way to help accommodate the housing needs of the area, and that it can deliver tangible benefits for the local community in terms of much needed family sized housing, affordable housing, and starter homes, as well as significant areas of high quality and accessible green space, new play facilities enhanced

pedestrian and cycle links, and biodiversity net gains. It would also contribute towards the expansion of existing educational facilities, improvements to the strategic highway network, as well as local routes, and improvements to public transport provision.

Furthermore, not only can said development be accommodated without any adverse environmental impacts but provide an opportunity to provide for significant environmental improvements.

In the context of the above we would like to highlight Catesby's desire to work with Canterbury City Council on the delivery of this site, and to this end would welcome the opportunity to meet with officers to discuss our proposals for this site further, as well as our associated reps on the Reg 18 Plan/ its supporting evidence base.

Yours sincerely



JUDITH ASHTON
Judith Ashton Associates

C.c. Victoria Groves – Catesby Strategic Land Ltd