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21 October 2025

Dear Sir or Madam,

DRAFT CANTERBURY DISTRICT LOCAL PLAN – REPRESENTATIONS TO THE FOCUSED CONSULTATION 2025

1. We are pleased to submit, on behalf of our client Altira Park JV LLP (the Partnership), representations on the latest version of Canterbury City Council's Draft Local Plan, which is undergoing a further 'focused' consultation.
2. We commented on the previous two Regulation 18 versions published in 2022 and 2024.
3. The focused consultation addresses; new draft allocation policies; changes to strategic site allocations; gypsy and traveller sites; and the impact of the 2024 NPPF.
4. Kitewood Estates Limited (Kitewood) and Urban&Civic created the Partnership to work together to deliver an exciting mixed-use scheme at Altira Park and Blacksole Farm, located to the south-east of Herne Bay. Many elements have now been delivered, but the Partnership want to carry on delivering investment in Herne Bay and are keen to ensure that the policy framework will help facilitate investment and job creation.
5. As well as responding to the previous Regulation 18 versions of this Plan, we previously submitted representations on behalf of the Partnership to Canterbury City Council's Issues and Options consultation in October 2020, and we promoted Altira Park in the Call for Sites consultation in July 2021 for mixed-use development.
6. The Partnership is keen to continue to work collaboratively with CCC to successfully invest and deliver high-quality, much needed residential, commercial and employment floorspace to benefit Herne Bay and the wider District.

Altira Park and Blacksole Farm

7. The Partnership controls the site and has successfully delivered the existing Sainsbury's store, a petrol filling station and employment generating floorspace on the site, together with the Albert Hugo Friday pedestrian footbridge over the railway line to the north of Altira Park. The bridge, together with the linkage through to Blacksole Farm, was installed significantly in advance of any requirement within the S106 for the original outline application for Altira Park and whilst delivered for the opening of the Sainsbury's store was not a requirement of the food store planning consent.
8. As part of this scheme, Kitewood has also dedicated a strip of land to KCC Highways adjacent to the Margate Road to enable the delivery of a footpath route.
9. The Partnership continue to be committed to delivering a wider masterplan for Altira Park and Blacksole Farm with an overarching vision to deliver a viable mixed-use scheme that will

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provide residential, commercial and employment floorspace. The Phase 1 of the masterplan involved the creation of a trade park which was granted planning permission on 18 August 2022 under planning permission ref. CA/22/01051. Despite the ~~current~~ challenging economic headwinds, work began on the delivery of the trade park in late 2022 and it is now completed and fully let.

10. The Partnership submitted two planning applications with the aim of delivering Phase 2 of the masterplan. Phase 2a comprised approximately 7,000sqm of commercial floorspace (application ref. CA/22/02660) and Phase 2b is delivering 67 new homes at Blacksole Farm (application ref. CA/22/02513). Consent for the 67 residential units was granted at Blacksole Farm in April 2023. These homes and the associated landscaping are currently being built out by Kitewood for Moat Housing and provides 49 units for affordable rent and 18 shared ownership houses.
11. The Partnership received consent for a mixed-use scheme providing retail and commercial floorspace and a drive-thru McDonald's restaurant in December 2023. Unfortunately, challenging economic environment in terms of increased build and finance costs together with a reduction in the availability of finance and falling values have all contributed to reducing the schemes viability to a point where the development could not proceed.
12. Despite this set back, the Partnership worked with David Lloyd Leisure to deliver a new state of the art David Lloyd Health Club on the site. David Lloyd Leisure are Europe's leading premium health and wellness provider. The new David Lloyd Health Club will create jobs and deliver an exceptional health and well-being facility for existing and new residents. The opening of the Health Centre will attract visitors and challenge perceptions of Herne Bay. The Health Club will be opening in November this year.

Existing Site Allocation and the Focused Consultation

13. As set out in previous representations submitted, Altira Park has been a location for employment development since the 1990s, with the employment designation being formalised in CCC's Local Plan adopted in July 2017. Blacksole Farm and 'Moynes', the residential property to the south-east of Blacksole Farm, were also included within the Altira Park designation despite being in residential use, having never been in employment use that might need protection.
14. A positive change in the focused consultation is that 'Moynes' is removed from the wider allocation. It is now being promoted as a housing site for approximately 25 new homes under allocation N25.
15. It is not entirely clear, but paragraph 3.39 indicates that the consented area at Blacksole Farm will be excluded from the wider Altira allocation in the next iteration of the Plan.
16. It would be helpful to know how else, if at all, the proposed allocation HB8 will change. We are hopeful that the amendments that we have previously suggested are incorporated. We address these below.
17. A significant part of the designated area has remained vacant and there has been limited interest in developing the site for employment uses despite continued marketing initiatives. In short, the current allocation is not effective because it does not provide sufficient flexibility to respond to the changing economic climate.

18. Paragraph 122 of the NPPF confirms that if there is no reasonable prospect of an application coming forward for the use allocated, LPAs should reallocate sites for more deliverable uses. Altira Park should be allocated for deliverable uses for which there is a need.
19. The proposed allocation in the previous Regulation 18 Plans improved the situation, but it still does not provide the flexibility to respond to market conditions.
20. It is appreciated that our previous representations relating to heritage, phasing and Moyne, have been acted upon, but the Partnership still have concerns that the draft allocation unnecessarily restricts development at Altira Park. In order to encourage investment and create jobs and opportunities, the allocation needs to allow further flexibility to ensure development comes forward on this important site.
21. On the basis that allocation HB8 is being amended through this focused consultation, we would like to update our representations to reflect the Council's changes, and the opening of the David Lloyd Health Club. We would also like to understand whether Blacksole Farm will be excluded from the allocation.
22. Our representations are set out below.

Emerging Policy HB8 'Altira'

23. Emerging Policy HB8 of the Draft Local Plan continues to be an allocation for 'business and commercial-led mixed-use development' including commercial, business, employment and residential floorspace along with the provision of open space. If Blacksole Farm is to remain within the allocation, Policy HB8 should be described as 'Altira Park and Blacksole Farm' and we request that the reference to the allocation being 'business and commercial-led' is removed. Instead, the allocation should be referred to as 'mixed-use.'
24. The Partnership welcome and support the additional uses set out within the previous emerging allocation. However, given the importance of ensuring that the emerging allocation enables delivery of development at this site, more flexibility must be included in the allocation. It was particularly disappointing that the reference to leisure floorspace was removed from Parcel A in the previous recent Regulation 18 version. The imprudence of this is highlighted by the consent that has been granted for a David Lloyd Health Centre (ref: CA/24/00631/FUL). If the Policy had been adopted, it is doubtful that David Lloyd Leisure would have been able to come to Herne Bay. The town would have lost investment, jobs and an internationally renowned operator that will help to re-set the image of the town. This is a salient lesson. Leisure uses should be supported at Altira, and the policy should reflect this.
25. The Partnership would like to engage and continue to work collaboratively with CCC on the following matters in relation to the emerging allocation.

Amendments to Proposed Parcel Allocations

26. The Partnership know the site very well and thus it understands its viability challenges. It has delivered investment and jobs for Herne Bay. It will continue to do so if the policy framework is flexible. The changes in ways in which people live, work, shop and spend their leisure time, and the increasing use of technology, means that development needs are evolving and changing more rapidly than ever. The dynamism of the commercial sector and the increasing costs of delivering development means that overly prescriptive planning designations do hamper and hinder investment and job creation. Policies and allocators must be flexible and support investment.

27. Historically, the prescriptive allocation in the adopted Local Plan (2017) has prevented and delayed investment and ultimately job creation and so we welcome the flexibility that the emerging policy provides for, but it needs to go further.
28. To ensure viability and delivery of development on the site, we request that there is enough flexibility on the proposed uses within the site allocation to react to changes to the market. Any use which creates new jobs and increases economic opportunities in the local area should be supported by the Council. It is clear from the slow development of the commercial, business and employment floorspace on the site, despite both local and national marketing campaigns, that any development will, and must, be occupier-led. The delivery of the David Lloyd Health Club was driven by David Lloyd Leisure's desire to find a site in Herne Bay, and the Council's willingness to view the allocation flexibly. It is crystal clear that the Partnership require as much flexibility as possible to attract such occupiers to this part of Kent.
29. The separation of 'business,' 'commercial' and 'employment' uses (which are defined within the Glossary of the Draft Local Plan) in the site allocation is confusing and does not provide for the flexibility that will be required during the Plan period to ensure Altira Park will contribute positively, socially, and economically to Herne Bay.
30. The allocation should support 'economic development' and allow for residential related uses, such as a care or nursing home, to deliver a mix of uses on the site. Whilst we welcome the officers' approach that reflects the Partnership's earlier masterplan and parcels that were promoted at an earlier stage, due to the everchanging market conditions, further flexibility is required to ensure that the site will be occupied, and jobs will be created up and until 2040, the end of the Plan period. Flexibility at this stage is better than prophecy to ensure investment and job creation is delivered.
31. In short, the Partnership do not consider that identifying 'parcels' helps. As noted, some and possibly all of Plot E might be removed as a result of this focused consultation. Parcels D and the Blacksole Farm part of Parcel E are either built out, or are being built out. A David Lloyd Health Centre will open soon taking much of Parcel A, but as noted, this was contrary to the drafted allocation.
32. The previous consent for retailing, a builders' merchant and a drive-thru restaurant on Parcel A (ref. CA/22/02660) confirms that such uses are acceptable and appropriate at Altira and should be reflected in the allocation.
33. In summary, the remaining land within Altira must be allocated for flexible economic development that creates jobs, including commercial, business and employment within Use Classes E (including leisure uses), B2 and B8, as well as other employment generating uses, including those falling into the sui generis class (such as a drive thru), and uses such as care or nursing facilities.
34. Given that a David Lloyd Health Club will be opening in November, Use Class E(d) should be included in the definition of commercial uses provided in the Plan's glossary. The opening of the David Lloyd Health Club shows leisure uses are acceptable at Altira. If the glossary is not amended, specific reference to acceptability of commercial leisure uses at Altira must be included in Policy HB8.



Summary of the Allocation

35. All uses within Classes E (including E(d)), B2 and B8, as well as other uses that create jobs, including public houses, drive-thru restaurants, builders' merchants and care and nursing facilities should be allowed at Altira Park.
36. The identified Parcels A, B and C should all be allocated for commercial, business, leisure, and employment floorspace and other uses that create jobs, and for avoidance of doubt, specific reference should be made to the appropriateness of leisure, retailing, drive-thru restaurants and builders' merchants as they are uses that have been consented on the site.
37. The Plan's glossary should include all uses within Class E within the definition of 'commercial use', as well as drive-thru restaurants and public houses or drinking establishments or car showrooms.
38. We welcome the removal of Moyne from the allocation and its inclusion as a separate residential allocation (N25). We would welcome knowing whether Blacksole Farm is also to be removed.

Pedestrian and Cycle Access

39. As noted, the Partnership have already improved walking and cycling connectivity within Altira Park and to the surrounding area through the delivery of the Albert Hugo Friday Bridge, and Kitewood dedicating land to KCC Highways to deliver a footpath link along the Margate Road. These improvements were provided in the knowledge that further phases of the development of Altira Park and Blacksole Farm would be coming forward. Further on- and off-site improvements to cycle and pedestrian access could be delivered through CIL funding and not additional undertakings such as S106 contributions and planning conditions.

Other Concerns about the Emerging Plan

40. The Partnership's other concerns with the drafting of the emerging plan and set out in our previous representations regarding: Biodiversity Net Gain (BNG); the Golden Plover; and the draft employment, retail and housing policies remain valid, but we do not restate them here as they are not covered by this focused consultation. However, we do hope that the Council will amend these elements of the Plan as suggested so that it supports investment and job creation and not act as a deterrent to business.

Overall Summary

41. In summary, the Partnership seek to engage further on the nature of the site allocation for Altira Park. The Partnership is very supportive of its inclusion in the Draft Local Plan and appreciates the vision and work of the Council in preparing the allocation. Notwithstanding this, the allocation cannot overly limit the types of employment generating uses, and should be supportive of economic and residential development coming forward. The Partnership do, therefore, request that the matters raised in these representations are acted upon in the next iteration of the allocation.
42. The opening of David Lloyd Health Centre reinforces the need for flexibility in the allocation. If the Plan had been adopted as drafted in the previous Regulation 18 consultation, it is likely that the allocation would have prevented David Lloyd Leisure from taking the site. An inflexible allocation will prevent investment and job creation rather than facilitating it.
43. The Partnership welcome the allocation of Moyne for housing, and would like to know if Blacksole Farm will also be excluded from the allocation.



44. The Partnership are not convinced that dividing the site into parcels is helpful because this is too prescriptive.
45. The commercial areas (Parcels A, B and C) should be identified for economic development. This should include commercial, employment and business development as defined in the Local Plan glossary (as proposed to be amended) and any other uses that create jobs, including other compatible uses such as builders' merchants, and car showrooms, leisure uses, care and nursing facilities and drive thru restaurants.
46. The Local Plan glossary should be updated so that 'commercial use' includes Use Class E(d) uses. The definition of employment use should also include builders' merchants if they are not considered to fall within Class B8 and other sui generis uses that create jobs, including drive-thru restaurants.
47. Floorspace figures are not required in the allocation because development will be occupier-led, and there is no need to be specific on which parcels or areas new floorspace will come forward. As noted, the areas should all be allocated for economic development. However, if the Council wants to include figures to show where new floorspace could be delivered, the wording should not be prescriptive. It should just state:

"Non-residential development that could be accommodated could include:

- Up to 18,000sqm of commercial and business space; and
- Up to 5,570sqm of employment space."

We hope the above is clear and helpful, and that the amendments proposed are incorporated in the next iteration of the Local Plan. We look forward to engaging further with the Council as the Local Plan progresses. Should you require any further information, please do not hesitate to contact me.

Yours faithfully



Sean McGrath
Director

Cc Nigel Wakefield, Urban&Civic