

CANTERBURY DRAFT LOCAL PLAN 2024 – DRAFT REGULATION 18 CONSULTATION (AUTUMN 2025)

JOB REF.

35022

DATE

21 October 2025

SITE ADDRESS

COMMERCIAL LAND AT LAND SOUTH OF COCKERING FARM, THANINGTON

ON BEHALF OF

PENTLAND PROPERTIES

1.1 INTRODUCTION

- 1.1.1 In response to the Canterbury City Council ('CCC' or 'the Council') Local Plan Focused Regulation 18 Consultation, these representations have been made on behalf of Pentland Properties.
- 1.1.2 The representations are submitted in the context of the following Site being promoted by Pentland Properties for development at:
- Commercial Land South of Cockerling Farm, Thanington – for circa 50 homes (Ref: SLAA358)
- 1.1.3 The Site forms part of the wider allocated Site 'Land at and Adjacent to Cockerling Farm, Thanington' which is allocated in the Adopted 2019 Canterbury Local Plan (Policy SP3 – Site 11) for a mixed use development including 1,150 homes and 1.5ha of employment space. The emerging Local Plan continues to support the allocation of the Site, through the saving of the allocation under Policy CF1 in respect of Site 11.
- 1.1.4 Following the grant of Outline planning permission (ref. 18/00346), Phase 1A of the scheme has been delivered by Pentland. The remainder of the residential phases of the development have been sold to BDW Kent who are in the process of bringing these forward. Pentland Properties have retained ownership of the commercial area ('the Site') which benefits from extant planning permission for the development of 4,000 sqm of business use.
- 1.1.5 The Site has previously been promoted for residential development as part of previous Local Plan consultations.
- 1.1.6 The following representations have been made having regard to the tests of 'Soundness' as set out in the NPPF (para 36), and the changes identified are necessary to ensure that the Local Plan is 'Positively Prepared', 'Justified', 'Effective' and 'Consistent with National Policy'.

1.2 PROMOTED DEVELOPMENT SITE

Strategic Land Availability Assessment (SLAA) (August 2025)

- 1.2.1 The Site was assessed with the most recent SLAA, August 2025, under site ref. SLAA358. The Site was assessed as being unsuitable for development for the following reason:

The site was assessed in the SLAA (2025), where it was considered technically suitable for the development use proposed, however would conflict with the adopted 2017 Local Plan as it has an extant permission for commercial space as part of wider mixed use permission.

- 1.2.2 As identified in the above extract, the Site was found to be technically suitable for residential development within the SLAA Technical Assessment, with no reasons flagged why residential development would not be suitable. The SLAA simply concludes that the Site would not be feasible for residential development by virtue of its extant planning permission for commercial development. No further justification is provided. As set out in the following sections, this assessment is not considered justified, and the Site should be re-considered for residential development as part of the emerging Local Plan.

Site & Development Overview

- 1.2.3 Land at and adjacent to Cockerling Farm, Thanington is allocated in the adopted Canterbury Local Plan 2017, for a mixed used residential development including 1,150 new homes, business floorspace and community facilities.
- 1.2.4 Pentland Properties own and control part of this site allocation, comprising Phase 1A, areas of open space and the commercial land. This part of the Site is known as "Land South of Cockerling Road, Thanington". The commercial land which is promoted for development is identified in the plan at Appendix 1.
- 1.2.5 Outline planning consent ref. CA/15/01479/OUT was originally granted for this part of the site allocation in August 2016 and subsequently varied by CA/18/00346 in November 2018 for the following development:

Variation of conditions 03 & 31 of planning permission CA/15/01479/OUT (outline permission for mixed use development of up to; 750 residential units, 4,000 m2 of business use, 1,000 m2 of retail/service uses, 5,000 m2 of residential institutions, including hospice and nursing home, 2,000 m2 of community and leisure uses; primary school; extended westbound slip road on the A2, accesses to Cockerling Road; internal roads, footpaths and cycle routes; plus new planting and landscaping. All matters reserved except access) to allow: relocation of; the employment area, the nursing home, a proportion of the housing, reduced local centre footprint; increase the height of the hospice; updated cricket pavilion pitch area; and updated internal access routes.

1.2.6 Reserved matters (RM) for Phases 1A, 1B, 1C, 1D, the hospice, the care home and the commercial floorspace have subsequently been granted permission. The Outline consent was supported by an Environmental Statement (ES) which demonstrates that the proposals do not give rise to unacceptable environmental impacts and thus the proposed development is acceptable.

1.2.7 RM approval for the required 4,000sqm of commercial floorspace was granted in May 2023 under ref. CA/21/01797 for the following:

Application for the approval of appearance, landscaping, layout and scale pursuant to CA//18/00346/VAR, for the employment area comprising 4,000 sq metres of business use.

1.2.8 This secured consent for Class E (g)(i) office floorspace (formerly Class B1) across 8no. 2-storey blocks. An extract of the approved layout is provided below.



Figure 1.1: Approved Layout for the Commercial Area

1.2.9 Development has commenced on the Site, with Phase 1A (built by Pentland) having been delivered and occupied. The remaining phases of development are being brought forward by BDW Kent. The grant of Outline consent on the Site, and subsequent RMs affirms that the Site is suitable, available and achievable for development. It therefore remains appropriate for the Site to continue to be allocated, and it is proposed as part of this submission that the site allocation is reviewed and the commercial land allocated for residential development to provide approximately 50 homes.

1.2.10 The Site already benefits from an extant planning permission, and therefore the principle of development on the Site has previously been deemed acceptable. The



proposals would be within the immediate reach of the wider Land South of Cockerling Road development, and the facilities and services that it will provide.

- 1.2.11 The re-provision of the Site for residential would not be at odds with the surrounding character, set within an existing residential development. The highways impact would also be minimised with residential uses typically generating fewer vehicle movements in comparison to offices. The re-provision of the Site for residential would further reduce the overall bulk and massing of the development, delivering a smaller development footprint and a reduced overall scale, with roof forms sitting lower than those currently approved on the Site. This change is therefore considered to present a significant benefit both visually and in terms of traffic impact.
- 1.2.12 The allocation of the Site for housing would help to underpin the Council's approach to direct development towards the South West Canterbury Strategic Development Area. Para 3.19 of the Focused Regulation 18 Local Plan notes that "*the Sites at South West Canterbury are set in a highly sustainable and accessible location*". The continued concentration of development in this part of Canterbury therefore remains logical and will help underpin the sustainability of the location in an area where the Council has already assessed development is acceptable.

Land Ownership & Deliverability

- 1.2.13 The Site is owned by Pentland, a local housebuilder that has a strong and reliable track record of delivering housing in Canterbury, having delivered Phase 1A of the development (179 homes).
- 1.2.14 There are no restrictions on the Site, and housing could be delivered within the next five years. Whilst the Site is located within the Stodmarsh catchment area, a solution will be provided.

1.3 PART 1 – ALIGNING WITH NEW NPPF REQUIREMENTS: ECONOMIC DEVELOPMENT AND MODERN ECONOMY

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?

- 1.3.1 As identified in earlier sections, part of the wider Site allocation included 1.5ha of employment land and the extant planning permission on the Site comprises 4,000sqm of commercial floorspace.
- 1.3.2 To support the Emerging Local Plan, an Economic Development and Tourism Study Report was prepared by Lichfield's in October 2020. This has been updated by the following supplementary notes:
- June 2022;

- August 2023; and
- March 2025 (this updated Chapter 8 of the original report only).

1.3.3 The March 2025 report assesses three different economic scenarios to consider the latest economic outlook for the district and estimates future economic growth prospects. The three economic scenarios are assessed are:

- Scenario 1: Labour Demand;
- Scenario 2: Labour Supply; and
- Scenario 3: Past Take Up

1.3.4 The result of each of these scenarios is set out in the extract below:

Table 2.11 Gross Employment Space and Land Requirements (2024/25-2042/43)

Use Class	Scenario 1: Labour Demand		Scenario 2A: Labour Supply-SNPP 2014 Based		Scenario 2B: NPPF 2024 Standard Method		Scenario 3: Past Take-up	
	Floorspace (sq.m GEA)	Land (ha)	Floorspace (sq.m GEA)	Land (ha)	Floorspace (sq.m GEA)	Land (ha)	Floorspace (sq.m GEA)	Land (ha)
Office E(g)(i)/(ii)	30,229	3.3	14,281	1.6	34,437	3.8	-24,732	-2.7
Light Industrial E(g)(iii)	38,854	9.7	14,591	3.7	43,245	10.8	-8,856	-2.2
Industrial B2	9,648	2.4	2,988	0.8	6,401	1.6	46,273	11.6
Distribution B8	44,974	11.2	29,510	7.4	47,853	11.9	55,559	13.9
Total	123,705	26.7	61,370	13.3	131,940	28.2	68,240	20.5

Source: Lichfields analysis (totals rounded)

Figure 1.2: Extract of Table 2.11 from the Lichfield's EDTS Update Report (March 2025)

1.3.5 Para 1.24 of the Focused Regulation 18 Local Plan states that the updated Economic Needs Assessments identifies a need for:

- 30,229 sqm floorspace for office use
- 38,854 sqm floorspace for light industrial use
- 9,648 sqm floorspace for general industrial use
- 44,974 sqm floorspace for warehousing use

1.3.6 It is therefore assumed that the Council are establishing the future requirement for employment floorspace based on Scenario 1. However, no justification is provided why this is the scenario that the Council has chosen. As identified in Figure 1.2 above, each scenario produces grossly different floorspace requirements, with less than half the amount of office floorspace required in Scenario 2A, and Scenario 3 producing a negative result for office floorspace

requirements over the plan period. It is therefore unclear why the Council consider it suitable to proceed with Scenario 1, which produces one of the highest figures for total floorspace requirements and office floorspace requirements.

1.3.7 This is particularly unclear given the July 2022 update reported a low level of market demand for office space, and an oversupply of total employment floorspace in Canterbury City, and only a low/moderate to moderate demand for office and industrial employment floorspace elsewhere in the District (see the extract at Figure 1.3 below).

1.3.8 It is therefore unclear how the choice of employment floorspace scenario matches with the Council's Spatial Strategy, particularly given the evidence base identifies there is an oversupply in the city.

Table 3.5 Comparison of Employment Floorspace Supply and Demand to 2045 by Sub Area

Sub Area	Available Employment Floorspace Supply (sqm)	Reported Level of Market Demand [‡]		Demand / Supply Balance to 2045
		Office	Industrial	
Canterbury City	64,319	Low	Low/Moderate	↑
Herne Bay	70,571	Low	Moderate/High	↔
Whitstable	3,266	Low	Moderate/High	↓
Rural areas / rest of District	8,121	Low/Moderate	Low/Moderate	↓
District Total	146,277	Low/Moderate	Moderate	↓

KEY ↔ = adequate supply ↑ = over-supply ↓ = under-supply

[‡] Based on property market analysis undertaken for the original EDTS

Figure 1.3: Extract of Table 3.5 from the Lichfield's EDTS Focused Update (July 2022)

1.3.9 Thanington falls within the Canterbury City area, therefore the loss of employment floorspace and the re-allocation of the Commercial Site for housing would not result in an under provision of employment floorspace within the city, which has an identified oversupply. Furthermore, each of the projected floorspace requirements include a 10% buffer on top of the actual requirement across the Plan period, to allow for the inevitable loss of floorspace.

1.3.10 For these reasons, the loss of commercial floorspace on the commercial Site would not result in the under provision of office floorspace across the plan period.

1.3.11 Given the evidence base has identified an oversupply of employment floorspace in Canterbury City (see Figure 1.3), the Regulation 19 Plan should set out a clear intention of where the employment floorspace should be directed over the plan period, with employment floorspace to be directed towards other areas of the District and away from Canterbury City which has been identified as having an existing oversupply of floorspace.

- 1.3.12 Further clarification is therefore required on why scenario 1 is the most appropriate measure to determine future requirements for office floorspace, and how this aligns with the Council's spatial strategy. The Regulation 19 Local Plan should further clearly identify where future employment space should be directed, given the overprovision with Canterbury City.
- 1.3.13 These changes and clarification are required to ensure that the Plan is 'Justified'.

1.4 PART 2 – DRAFT LOCAL PLAN POLICIES FOR CONSULTATION – CANTERBURY AREA

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

Site 11: Land at and adjacent to Cockerling Farm Thanington

- 1.4.1 The Focused Regulation 18 Local Plan does not propose any changes to existing allocated site 'Site 11 – Land at and Adjacent to Cockerling Farm, Thanington'. Whilst the continued allocation of this Site is supported, we object to the wording of the site allocation in its current form in respect of the employment element only.
- 1.4.2 For the reasons set out previously, the Thanington Commercial Site is suitable for re-allocation for residential development of c. 50 homes as part of the emerging Local Plan.
- 1.4.3 Whilst the Site benefits from extant planning permission for commercial floorspace, there is an identified overprovision of commercial floorspace in Canterbury City, including an identified low demand for office floorspace. The Site forms part of a wider strategic allocation, and its suitability for development, as well as the principle of development, has already been established. Furthermore, this part of Canterbury remains an important area for growth as part of the emerging Local Plan. The re-allocation of the Site for residential development therefore remains logical and in-line with the spatial strategy of the emerging Local Plan.
- 1.4.4 For these reasons, the Site allocation Policy should be updated to remove the requirement for 1.5ha of employment floorspace and increase the number of units allocated to circa 1,200 homes (an increase of 50 homes).

1.5 CONCLUSION

- 1.5.1 These representations have been submitted on behalf of Pentland Properties, in response to the current Focused Regulation 18 Local Plan consultation and its supporting evidence base.
- 1.5.2 Representations have been made in response to the proposed requirement for employment floorspace over the Plan period. It is not clear why Scenario 1 has been selected to inform the employment floorspace requirement over the Plan

period, and how this aligns with the Council's spatial strategy. Particularly given there is at most only a moderate demand for industrial employment floorspace and a low/moderate demand for officer floorspace within the District.

- 1.5.3 The Regulation 19 Plan needs to provide a clearer direction of where any future employment floorspace should be delivered, given there is an identified overprovision of employment floorspace within Canterbury City.
- 1.5.4 The commercial Site at Thanington, whilst benefitting from extant permission for officer employment floorspace, is in excess of requirements. The loss of this floorspace would therefore not result in an under provision of employment floorspace across the Plan period.
- 1.5.5 Instead, the Site would provide a suitable and sustainable addition to the Local Plan for residential development of c. 50 homes. The Site's re-allocation for housing would help to underpin the strategy of the emerging Local Plan to direct development towards the South West of Canterbury Strategic Development Area and deliver housing growth on an unconstrained Site that has already been identified as suitable for development. Accordingly, the Regulation 19 Plan should revise the wording of retained site allocation 'Site 11 – Land Adjacent to Cockerling Farm, Thanington' to remove the requirement for the delivery of 1.5ha of employment floorspace and increase the number of homes allocated to c. 1,200.
- 1.5.6 These representations have been made having had regard to the tests of "Soundness" as set out in the NPPF (para 36), and the changes identified are necessary to ensure that it is 'Positively Prepared', 'Justified', 'Effective' and 'Consistent with National Policy'.

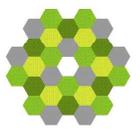
APPENDIX

1



HM Land Registry
Official copy of
title plan

Title number **TT101909**
Ordnance Survey map reference **TR1356SE**
Scale **1:1250**
Administrative area **Kent : Canterbury**



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