



## Growth and Communities

Canterbury City  
Council Development Control  
Military Road  
Canterbury  
CT1 1WY

Invicta House  
County Hall  
Maidstone  
Kent  
ME14 1XX

### BY EMAIL ONLY

Phone: [REDACTED]  
Ask for: Hannah Lawrence  
Email: [REDACTED]

October 2025

Dear Sir, Madam,

### Re: Canterbury Local Plan Regulation 18– Formal Consultation

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the Canterbury Local Plan Regulation 18 document, in accordance with the requirements of the Localism Act 2011.

The County Council has reviewed the Local Plan and for ease of reference, has provided comments structured under the chapters and policies used within the document.

### General Commentary:

#### Waste Management

The County Council is the Waste Disposal Authority (WDA) in the area and as such has a statutory duty to provide Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTSs) with sufficient capacity to accept arisings from across the county. Canterbury City Council is the Waste Collection Authority (WCA) for the area and is responsible for kerbside collections.

There are two HWRCs in the area, Herne Bay and Canterbury. Booking statistics show that these are nearing/at capacity. Herne Bay HWRC is typically at 75-80% capacity currently. The waste management team's response is therefore unchanged from May 2025. The housing growth proposed in the Local Plan will place increased pressure on HWRCs, and so the County Council will continue to request contributions towards increasing capacity at HWRCs serving local development.

### Development Investment Team

The County Council has worked closely with the City Council throughout the plan-making process to ensure that the infrastructure requirements necessary to support sustainable growth are clearly identified. In particular, the County Council has set out its position in relation to education and community infrastructure and is satisfied that these have been appropriately reflected in the emerging plan. As such, the County Council's Development Investment Team has minimal further comment at this stage but will continue to seek developer contributions in accordance with the Developer Contributions Guide 2023 to ensure that the impacts of development are fully mitigated.

### Minerals and Waste

It is the view of the County Council that there are no land-won minerals or waste management capacity safeguarding objections or comments to make regarding this Local Plan Regulation 18 Consultation.

### Flood & Water Management

The County Council as Lead Local Flood Authority, provided comment last year on the full Local Plan which considered those policy items, and which have been attached to this response (See Appendix A). Since this previous response, which was *"We would advise for including rainwater harvesting/ reuse as a recommendation at the end of point 4"* the County Council only has one additional comment to make, which is as follows:

"DEFRA have now released their updated SuDS Technical Standards and that water re-use is now formally required to be considered as the principle means for managing surface water and Canterbury City Council (CCC) may wish to ensure this is considered and referenced in policy DS20."

### Highways & Transportation

Canterbury City Council is currently undertaking transport modelling to support the Regulation 18 submission. The outcomes of this work will inform the final Regulation 19 draft, expected in early 2026. At that stage, KCC will be able to provide more detailed comments on the transport and traffic elements of the plan.

### Local government reorganisation

In light of potential future changes to the structure of local government in Kent, it is essential that the Local Plan remains robust and adaptable. All references to Kent County Council within the Plan should be amended to read *"Kent County Council or its successor organisations"* to ensure continuity in the delivery of strategic infrastructure. This will safeguard the ability to secure and deliver necessary infrastructure such as education, transport, and social care services, irrespective of any reorganisation that may occur.

**Please see below for further specific comments on the policies with the Regulation 18 Consultation:**

Energy Security and Future Impacts

**Water Infrastructure and Delivery, 1.37:**

The County Council as the Lead Local Flood Authority, would strongly encourage Canterbury City Council to incorporate considerations for sustainable urban drainage systems (SUDs) within the early stages of the planning application process. If possible, we would encourage the integration of SUDs considerations by the developer as part of the Environmental Impact Assessment (EIA) process. Relating to this, we would encourage the LPA to advocate for the consideration of SUDs within the scoping opinion for Environmental Statements.

The County Council recommends that SUDs should be explored for all new development.

**University of Kent Site**  
Highways and Transport

This site has been removed from the Local Plan allocations. Consequently, the previously proposed junction upgrades at Harbledown and Rough Common onto the A2 are no longer being pursued.

**Brooklands**  
Highways and Transport

Brooklands is included as an allocation and proposes new east-facing slip roads at Chestfield onto the A299. The proposal should be reflected in the Regulation 18 submission.

**Policy N1 – Land at Merton Park**

Development Investment

The County Council would seek the following amendments (See *Italics*). The suggested changes in wording should also be reflected in site policies included in the Regulation Consultation 2024 that contain on-site provision for schools:

1) b) iii) Provision of a new 3FE primary school with early years provision (3 ha site), located adjacent to the community hub;

5) d) The primary school site must be transferred to Kent County Council, its successor or nominee at 'nil consideration' and fulfil KCC's General Transfer Terms prior to the occupation of 100 dwellings or as otherwise agreed by KCC or its successor. New and improved walking and cycling connections to school locations, both within the site and in surrounding communities, are required to be provided prior to the opening of the school on-site.

## Highways and Transport

The access strategy for Merton Park has been revised, with the previously proposed A2 slip roads now removed from the scheme. The site now promotes a Sustainable Transport Strategy (STS), which has been reviewed by KCC. While the strategy has merit, certain elements still require further clarification.

Vehicle access is now proposed via Homersham and Hollow Lane (from the A28 to the northwest) and Nackington Road to the east. Further detail is needed on internal vehicle movement, connectivity to the local road network, and the potential for Merton Park to be used as an alternative route to Wincheap and the ring road. Trip rates have been agreed upon for modelling purposes.

The STS references the fast bus route proposed through the Ridlands Farm site and suggests a potential diversion via Langton Lane to serve Merton Park. As Langton Lane is also part of a strategic allocation (N2) for approximately 14 dwellings, it will be important to safeguard any proposed route to ensure access for the fast bus.

It is understood that the Hollow Lane C7 site is not being taken forward as a strategic allocation, as potential highway impacts have not been satisfactorily resolved to date to the satisfaction of the Highway Authority, and the site is considered to sit too remote from the city centre and other local amenities to be considered a sustainable location.

## **Policy N4 – Land South of Littlebourne Road**

### Development Investment

The County Council seeks the following amendments (See *italics*):

1) b) ii) Provision of a new 3FE primary school with *early years provision* (3 ha *site*), located adjacent to the community hub;

5) g) The primary school site must be transferred to KCC, *its successor or nominee* at 'nil consideration' and fulfil KCC's General Transfer Terms prior to the occupation of 100 dwellings *or as otherwise agreed by KCC or its successor*. New and improved walking and cycling connections to school locations, both within the site and in surrounding communities, are required to be provided prior to the opening of the school on-site.

## Highways and Transport

### East Canterbury Strategic Development Area

The inclusion of this site, alongside N5, N6, and Site 1 (Policy CF1), presents an opportunity to deliver a new road link between the A257 and the A2. This could provide additional relief to the ring road and support the development of park & ride facilities and active travel corridors.

## **Policy N5 – Land South of Bekesbourne Lane**

### Development Investment

The County Council would seek the following amendments (as shown in Italics) to this policy. To provide clarification:

1) b) ii) Provision of a new 2FE primary school with early years provision (2.05 ha site), located adjacent to the community hub;

5) f) The primary school site must be transferred to KCC, its successor or nominee at 'nil consideration' and fulfil KCC's General Transfer Terms prior to the occupation of 100 dwellings or as otherwise agreed by KCC or its successor. New and improved walking and cycling connections to school locations, both within the site and in surrounding communities, are required to be provided prior to the opening of the school on-site.

## **Policy N8 – Millers Field car park**

### Development Investment

The County Council's threshold for seeking developer contributions (s106) is 10 or more dwellings or a site size of 0.5 ha and above. Should this development meet these thresholds, it is expected that developer contributions will be sought as per Policy DS7.

## **Policy N22 – Land at Beresford Road**

### Development Investment

The County Council's threshold for seeking developer contributions (s106) is 10 or more dwellings or a site size of 0.5 ha and above. It is recommended that should this development meet these thresholds, it is expected that developer contributions will be sought as per Policy DS7.

## **Policy N35 – Gypsy and Traveller Accommodation**

### Development Investment

When identifying potential locations for Gypsy and Traveller sites, the County Council notes that it is important to consider the accessibility of local schools to ensure that residents, particularly children, can access education services safely and sustainably.

## **The Housing Needs Assessment Update (July 2025) and Policy DS2 – Housing Mix**

### Specialist Housing and Adult Social Care

The County Council notes the findings of the Housing Needs Assessment (July 2025) and recommends that it be more closely aligned with the strategic priorities and evidence base of Adult Social Care, particularly in relation to the accommodation needs of older and vulnerable residents. This information is contained in KCC's draft **Kent Adult Social Care Accommodation Market Position Statement 2025–2035**, which has been consulted upon with the district councils, including Canterbury's Housing Strategy Manager.

The Canterbury district has one of the highest populations of older people in Kent, with a projected population of people aged 65+ of 36,989 by 2035. This demographic trend has significant implications for housing, care, and health infrastructure and must be reflected in the Local Plan to ensure sustainable and inclusive growth.

While Canterbury currently has the highest number of residential care beds in Kent, this does not equate to a balanced provision. There is an over-supply of standard residential care and a notable under-provision of dementia and nursing care, which are increasingly needed as the population ages and care needs become more complex.

To address these challenges, the County Council recommends the following for inclusion in the Local Plan:

- Rebalancing Residential Provision:  
Rather than additional standard residential care, future provision should focus on:
  - Dementia care
  - Nursing care
  - Extra Care Housing – there is significant need for at least one extra care housing scheme in the district.
- Supported Living:  
There is a need to increase the supply of modern, fit-for-purpose supported living schemes for working-age adults, particularly for people with learning disabilities, mental health needs, and complex care requirements. This should be encouraged through planning policy.
- Modernisation and Cost-Effectiveness:  
Residential and nursing homes must be:
  - Modern and fit for purpose
  - Financially sustainable, including consideration of long-term affordability for local authority placements.
- Assistive Technology:  
All new specialist housing schemes should embed assistive technology from the outset, supporting independence and reducing long-term care costs.

The County Council would welcome further engagement with Canterbury City Council to ensure that the Local Plan reflects the full scope of adult social care accommodation needs and supports the delivery of sustainable, inclusive communities.

## **Policy DS7 – Infrastructure Delivery**

### **Development Investment**

The County Council would recommend that the following amendments in *italics* are proposed to add clarity and strengthen the policy:

Paragraph 1 - Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to *provide land, build, and/or make financial contributions* towards the additional requirement being provided to an agreed delivery programme.

The County Council would welcome continued engagement as the Local Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,

Simon Jones  
Corporate Director – Growth, Environment and Transport

## Appendix A

The County Council's Flood & Water Management's team made comments on the full local plan referenced in the current consultation.

The County Council as Lead Local Flood Authority have reviewed the latest version of the Canterbury's Local Plan (March 2023) and have no groundbreaking items to add. They are pleased that our previous comments as part of the earlier Reg18 have been taken onboard and incorporated into the document.

The only additional items we have to add is for:

DS20- Flood Risk and Sustainable Drainage - Point 4 contains a requirement for new developments to adhere to the drainage hierarchy as per the PPG. We would advise for including rainwater harvesting/ reuse as a recommendation at the end of point 4.

The inclusion of rainwater harvesting is particularly relevant to commercial or industrial settings that have both large impermeable surfaces and greater opportunity (associated costs and space) to include such measures as opposed to residential dwellings.

Confirmation regarding DS20- Flood Risk and Sustainable Drainage – Point 3 for when the sequential test is not required, one of these is “Development on previously developed land” we have been unable to find this stated within the government guidance. We would advise that the statements within point 3 are double checked to be correct in line with guidance.