

Planning and Development

Ask for: Timothy Bailey

Email: [REDACTED]

Direct line: [REDACTED]

Mr A Thompson
Planning Policy Manager
Canterbury City Council
Military Road
Canterbury
Kent
CT1 1YW

Our Ref: CDLP-10/25

Date: 30th October 2025

Dear Mr Thompson,

Canterbury Local Plan 2042/43 (Regulation 18) - Focused Consultation

Thank-you for inviting Ashford Borough Council (ABC) to comment on Canterbury's draft District Local Plan 2042/43 (Regulation 18) – focused consultation.

The Council has now had the opportunity to review the consultation document and supporting evidence; and wish to make the following comments and/or observations:

Plan Period

The Council acknowledges and supports the proposed changes to the plan period from 2020/21-2040/41 to 2024/25-2042/43, aligning with the requirement in the National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG) to ensure a plan lifetime of at least 15 years at adoption.

The revision of the plan period has necessitated the need for a reassessment and recalculation of the district's development requirements to 2042/43, which are responded to in turn below.

Housing and Spatial Strategy

ABC notes Canterbury's revised housing requirement figure, which is now calculated using the updated Standard Method formula that was introduced at the end of 2024. Compared to the previous draft Local Plan, this represents a modest increase in the number of new homes needed to be delivered across the district from 22,980 to 23,085; or an additional 66 dwellings

per annum. ABC supports the revised housing figure and CCC's intention to keep it under review as the local plan progresses.

ABC notes that [REDACTED] strategic sites at the University of Kent and Hollow Lane have been [REDACTED] the draft Local Plan as they are no longer considered suitable for development. This has resulted in a change to the proposed spatial strategy that was consulted upon before. The housing envisaged to be delivered by these sites, along with the added uplift in absolute numbers, are now to be met through a range of small and medium-sized sites, as part of a more dispersed pattern of growth.

ABC is supportive of Canterbury's continued intention to meet its housing needs in full. It also supports the proposed amendments to the spatial strategy, which focuses principally on the re-distribution of housing in accordance with the settlement hierarchy, directing the majority of growth to the most sustainable settlements of Canterbury and the coastal towns of Whitstable and Herne Bay. Additionally, in respect of new housing allocations in the rural villages, the Council makes no comment on those proposed in Chartham. ABC are of the view that this approach delivers a more robust and defensible 5-year land supply in line with NPPF requirements.

Gypsy and Traveller Accommodation

ABC acknowledges the update to Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA), which reduces the outstanding requirement from 54 to 43 pitches over the plan period, 22 of which are needed in the first five years of the plan. This reduction is predominantly accounted for by the regularisation of several unauthorised or temporary Gypsy and Traveller sites across the district.

It is understood that CCC had originally envisaged to allocate sites to address the identified 5-year pitch supply with the outstanding to be met through future windfall applications. The Council supports CCC's revised proposed approach, which seeks to meet their G&T pitch requirement in full through a combination of intensification of existing sites, along with a large new site at Whitstable.

Employment

In respect of employment land, it is observed that despite the requirements for business floorspace falling across all employment sectors, draft Policy N23 proposes an extension to the Joseph Wilson Business Park near Whitstable providing a further 7,720 sqm of business and employment floorspace. Given that employment floorspace previously included as part of the University of Kent and Hollow Lane allocations have been re-provided in full across two new site allocations at Littlebourne, this has the consequence of further increasing the over-supply of employment floorspace in the district from the previous stated position.

ABC accepts the need to plan positively for economic growth and to ensure that this isn't unduly constrained by a lack of site capacity. Therefore, the Council will continue to monitor the current position and give consideration as to how this may fit into its own employment strategy as part of the preparation of its own Local Plan to 2042/43.

Retail

Similarly, a fall in the retail requirements for the district is noted. At present, it is unclear as to whether CCC [REDACTED] their retail market share or what the individual retail strategies [REDACTED] District Centres may look like. Therefore, ABC reserves the right to comment further once the bespoke strategies for Canterbury City Centre, and District Centres of Whitstable and Herne Bay have been prepared and published for consideration.

Infrastructure

Following the government announcement that a new hospital at Canterbury would not receive funding, the 'focused consultation' proposes to remove this land from draft Policy C6 (*land at Merton Park*) and carry forward the Canterbury Local Plan (2017) adopted allocation Policy SP3, Site 10 (*land at Ridlands*) for 310 dwellings. Policy SP3 still reserves land at Site 1 (*South Canterbury*) for the potential relocation of the Kent & Canterbury Hospital, if required in the future.

ABC commented previously that it sought greater clarity on the implications on health service provision and resources at the William Harvey Hospital, as well as any potential effects on the local highway network, if a new hospital did not form part of the final strategy. This point doesn't appear to be covered by the current consultation and should be addressed prior to the publication of the Regulation 19 document.

Yours sincerely,

Timothy Bailey

Deputy Team Leader Plan Making and Infrastructure