



Draft Canterbury District Local Plan: Regulation 19 Consultation - Comments of the Watkin Jones Group PLC

From Iain Smith [REDACTED]
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To Consultations <Consultations@canterbury.gov.uk>
Cc Iain Smith [REDACTED]

1 attachment (716 KB)

Canterbury Local Plan Consultation - Representations by the Watkin Jones Group.pdf;

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Dear Sir or Madam

The Watkin Jones Group PLC (WJG) welcomes the opportunity to provide comments on the draft Canterbury Local Plan: Regulation 19 Consultation. This email provides our comments.

WJG also takes the opportunity to thank the Council for considering its previous comments submitted in May 2024 and amending draft policies in response. A copy of its previous comments are attached.

WJG provides some additional comments below, and it is respectfully requested that these are considered within the future evolution of the emerging Local Plan.

Affordable Housing Within Build to Rent Developments

It is not clear within draft Policy DS1 'Affordable Housing' as to the form of affordable housing which should be provided within build to rent (BTR) developments. It is only within the glossary that this is clarified, and which states *"For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent)"*. To ensure that the policy approach is clear, it is suggested that an additional point is added to draft Policy DS1 to confirm that Affordable Private Rent (APR) is the form of affordable housing within BTR schemes.

There is also no definition of APR within the draft Local Plan, and this should be added. To ensure consistency with national policy, the definition should align with that detailed within the BTR chapter of National Planning Practice Guidance, namely that it is managed collectively by a single BTR landlord (i.e. not a registered provider), and that it should be set at a level that is at least 20% less than the private market rent (inclusive of service charges) for the same or equivalent property (typically benchmarked against the market units within the same development).

Clawback Period for Build to Rent Schemes

Part 7(a) of draft Policy DS5 'Specialist Housing Provision' requires that BTR *"the homes are secured in single ownership providing solely for the rental market for an extended period minimum 20-year term with provision for clawback of affordable housing contributions should the covenant not be met"*. Whilst WJG supports the principle of the Council's suggested approach, it can find no explanation as to why the covenant period is 20 years.

As mentioned within our previous comments submitted in May 2024, BTR housing is typically institutionally funded. Those funds rely on established investment assumptions. One of these is that BTR is covenanted to remain a rental product for a period of 15 years. This is an approach established more widely across the UK, for example within Policy H11 of the London Plan. WJG is not aware of any policy which has a covenant period of greater than 15 years.

Whilst it may appear to be a minor point, a longer covenant period of 20 years will deter investment in BTR. To ensure that the policy is effective in delivering BTR and supports the borough in being attractive to BTR investors, WJG suggests that the covenant period detailed within draft Policy DS5 is reduced to 15 years.

Location of PBSA

Part 3 of draft Policy DS5 'Specialist Housing Provision' states *"proposals for purpose built student accommodation within higher and further education establishments will be supported. Where this is not achievable, proposals must be located within a 10 minute walk of the relevant campus. In exceptional circumstances, where it can be demonstrated there are no suitable available sites, locations with easy access to high frequency public transport may be considered"*.

There is no definition as to what *"suitable"* means in the above policy, and therefore clarity should be added. It is suggested that Part 3 of draft Policy DS5 is amended to state the following (additional text underlined):

"Proposals for purpose built student accommodation within higher and further education establishments will be supported. Where this is not achievable, proposals must be located within a 10 minute walk of the relevant campus. In exceptional circumstances, where it can be demonstrated there are no reasonably suitable, available, deliverable or viable sites for a similar quantum of PBSA units, locations with easy access to high frequency public transport may be considered".

Final Comment

We trust that the above comments are of assistance to the Council and will be considered. Please do not hesitate to contact me on [REDACTED] should you have any queries.

Kind regards
Iain

Iain Smith
Planning Director



Kingsfield Court, Chester Business Park, Chester, CH4 9RE



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