

Lauren Morien
Planning Policy
Canterbury City Council
14 Rose Lane
Canterbury CT1 2U

By Email

22 April 2026

Dear Ms Morien

**CANTERBURY CITY COUNCIL LOCAL PLAN
REGULATION 19 CONSULTATION
RESPONSE ON BEHALF OF Stonebond Properties (Sevenoaks) Ltd**

We write on behalf of our client, Stonebond Properties (Sevenoaks) Ltd ('Stonebond'), in response to the Council's Regulation 19 consultation on its draft Local Plan. This represents the last consultation pre-submission of the Plan to the Secretary of State.

Stonebond are a local based SME partnerships developer focused on delivering high-quality residential developments across the South East. They have a proven track record of delivering homes including in partnership with registered providers and local authorities.

Stonebond has land interests (through agreements with the landowner, Canterbury City Council) in Canterbury at "Land at Military Road" (the Site). The Site is identified as an opportunity area in the adopted Local Plan (July 2017) and is proposed allocation in the draft Local Plan (Policy C19). The Site is subject to a live planning application (ref. CA/25/01058) as detailed below. The focus of these representations is on the Site and its proposed allocation.

The Site

The Site comprises circa. 2.85ha of previously developed land containing the former offices of Canterbury City Council alongside associated parking and servicing areas. It is located close to the defined boundary of Canterbury City Centre in the adopted Local Plan and within the Urban Area of Canterbury. It is surrounded by existing built development including the residential and commercial uses.

The Site is generally unconstrained, not being at risk of flooding or within any areas designated for heritage or landscape value.

The Site, alongside the existing residential area to the west of the Site, is identified as an opportunity site in the longer term for new housing during the adopted Local Plan Period as part of Policy HD1 (Housing Allocations).

There is an abundance of key services nearby (inc. the City Centre), within easy walking and cycling distance, inc extensive retail and employment opportunities, plus leisure and social/community facilities (inc medical centres, cinema, gym, restaurants, pubs, and bars). Moreover, the new neighbourhood Canterbury Riverside is located northwest of the Site, hosting a range of shops, restaurants and a cinema.

There are a variety of public transport links within walking and cycling distance of the Site including nearby bus stops and Canterbury East and West train stations.

Current Planning Application

The Site is subject to a Full planning application submitted by Stonebond on 17 June 2025 for:

the demolition of existing buildings and structures, and the construction of residential dwellings (C3 use) with access from Chaucer Road and Military Road, and supporting infrastructure including roads, car parking, and green and blue infrastructure, alongside ancillary works including earthworks

The planning application seeks consent for 125 high quality homes in the form of houses and flats comprising 1, 2, 3 and 4-bedroom homes, with a policy compliant provision of affordable housing (30%). The latest site layout plan and landscaping plans supporting the application are in Appendix A and B respectively.

Prior to submission of the application, extensive pre-application engagement was complete with Canterbury City Council Planning Officers including formal meetings in July 2023 and October 2023 and ongoing consultation up to submission. Pre-application engagement helped shape the proposals including the number of units, proposed housing mix, layout and design.

Post-submission we have been working closely with Officers to address comments received from the Council, consultees and other stakeholders. This has led to further design refinement. All matters have now been addressed with the application likely to be

considered at Planning Committee in the coming months, once required nutrient credits have been legally secured.

Policy C19 – Land at Military Road

We support the identification of the Site as an allocation in the draft Local Plan. It is a suitable, available and deliverable location for residential development, on previously developed land in a highly sustainable location.

As drafted, the policy has been informed by high-level assumptions which underpin draft allocations across the Canterbury Urban Area. This includes use of a standard density calculation (80 dwellings per hectare) and no consideration of technical work completed to support the live application.

Conversely, the planning application has been supported by thorough pre-application engagement, detailed technical and design work, including consideration for what quantum of development is appropriate for the context within which the Site is located, and consultation with statutory and non-statutory consultees and other stakeholders post-submission. As noted above, there are no outstanding technical or design matters, beyond nutrient neutrality.

The application has sought to deliver a genuine mix of homes through both flats and houses, resulting in a proposed density of 44 dwellings per hectare. This should be seen as a benefit, with the scheme aligning with the mix needs for Canterbury City sub-geography as set out in Table 8 of the Housing Needs Assessment Addendum (HNA, February 2024). The HNA, when considering what was likely to be deliverable, highlighted the majority of homes likely to come forward in the Canterbury City sub-area were 1 and 2-bed flats, despite the need being greatest for larger dwellings.

In light of the highly sustainable location of the Site we do not consider there to be a justified requirement for local shopping or community facilities to be provided on Site. Residents will be within easy walking distance of existing facilities, including the Sainsbury's supermarket and neighbouring recreational uses at the Riverside neighbourhood area within 10 minute walk of the Site.

It is likely the current application will be determined ahead of the Local Plan being submitted to the Secretary of State. We therefore consider modification is required to the policy in order to reflect the application and ensure alignment with this. Our suggested modification is as set out below:

Site C19 is allocated for residential development. Planning permission will be granted for development which meets the following criteria:

1. Development Mix

Across the site, the development mix will include:

a. Approximately **125** new dwellings including affordable housing, accessible housing and an appropriate housing mix in line with Policies DS1 and DS2.

b. Non-residential development:

~~i. Consideration of need for local shopping and community facilities; and~~

i. Proportionate contributions to community infrastructure in line with Policy DS15.

c. Open space provided in line with Policy DS28.

2. Design and Layout

The design and layout should:

a. Provide a high-quality built environment taking into account site constraints and local housing needs, ~~in line with Policy DS13 with an average net density of around 80 dph;~~ and

b. Be informed by a Heritage Statement and where appropriate sustain and enhance the significance of nearby heritage assets including the Grade II Listed All Saints Church, in line with Policy DS30.

3. Landscape and Green Infrastructure

The green and blue infrastructure strategy for the site should:

~~a. Provide a significant proportion of the open space in the eastern part of the site to provide a substantial landscape buffer to the Old Park and Chequers Local Wildlife Site and priority habitat at Realm Wood; and~~

a. Protect and enhance the existing **high-quality** trees on site, including those on the south western boundary of the site, in line with Policy DS25.

4. Access and Transportation

The access and transport strategy for the site should:

- a. Provide pedestrian and cycle connectivity between Military Road and Chaucer Road where it meets Falala Way;**
- b. Retain suitable vehicular, cycle and pedestrian access to the Royal Mail Sorting and Delivery Office from Chaucer Road; and**
- c. Provide a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars in line with Policy DS18.**

Whilst broadly aligning with the proposals, the accompanying concept plan should be amended to reflect (or removed) these wholly including removal of the open space / biodiversity area to the east of the Site. This ensures the proposed allocation is aligned with the current proposals for the Site.

Summary and Next Steps

We have worked alongside the Council on the proposals for Military Road, Canterbury for the last several years culminating the submission of an application which is shortly to be determined. Whilst we welcome the allocation of the Site in the draft Local Plan the proposed policy should align with the proposals which are well advanced and supported by detailed technical and design information. The application considers the Site in significant detail, beyond the high-level assumptions which underpin the Local Plan. We therefore ask the Council include the proposed modifications above as part of its Main Modifications alongside submission of the Plan.

Should anything else be needed at this stage, including any of the information supporting the current application, please do not hesitate to get in touch.

Yours Sincerely

Joshua Mellor
Planning Director

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