



Our Ref: JS/MC

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11<sup>th</sup> May 2026

Dear Sir/Madam,

### **Response to Regulation 19 Consultation – Local plan to 2040 – Draft Policy R14 – Land west of Cooting Lane and south of Station Road, Adisham**

I am writing on behalf of the landowner, Mrs S Leidig, to support the residential allocation proposed in Emerging Draft Policy R14, land west of Cooting Lane and south of Station Road, Adisham.

#### **Soundness**

The Framework paragraph 36 sets out the test for soundness against which a Plan will be examined; positively prepared, justified, effective and consistent with National Policy. In respect of Policy R14, it is considered that the Plan fails in these tests as the Council has significant delivery issues related to Stodmarsh Catchment which affect housing delivery within Canterbury District. Given this, limiting the allocation of land to a small number of dwellings where a larger number can be justified without conflict with other Plan policies in a sustainable settlement with a railway station within walking distance is failing in effective provision of housing.

The Emerging Plan suggests some 2,429 dwellings needed within the overall housing delivery need of 23,085 are to be from windfall developments, however providing more dwellings within allocated policies would provide greater certainty of delivery than relying on windfall developments coming forwards. Under the 'target/objective' for windfall completions (Monitoring Indicators, page 342 in the Emerging Reg 19 Plan) it states that windfall development should be delivered wholly on brownfield sites within Urban Areas and settlement boundaries which severely limits windfall development opportunities within the Plan Period. Therefore the Plan policy as proposed is not effective in delivering the identified housing need over the Plan Period.

Whilst the allocation for 10 units fronting Station Road is supported, a larger site area was submitted at the Call for Sites stage as well as at the Regulation 18 Consultation Stage in 2024. This showed a larger land area available in Adisham for residential development, which has not been included within the Draft Policy allocation. With the additional land, opportunity exists for the larger site to provide some 47 new residential dwellings, with a 30% affordable provision to help support the retention of younger families within the settlement.

The Regulation 19 Draft Plan defines Adisham as a Local Service Centre (Canterbury District Settlement Strategy page 15 of the Reg 19 Plan). Adisham benefits from a railway station, with pedestrian access from Station Road just 350 metres from the Draft Allocated site and a bus stop is located outside the site on Station Road, providing good local public transport services and also benefits from a primary school located on The Street, which provides Breakfast Club and After School Club services.

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The Strategic Land Availability Assessment 2022 considered the larger site area (site reference SLAA185), a total of 2.64 hectares fronting Cooting Lane and Station Road to be '*suitable, available and achievable*'. It noted the site was '*not particularly sensitive regarding biodiversity*' and '*there were no incompatible uses nearby*'. The SLAA found that the site has an anticipated developable area of 78% as appropriate, then reduced the developable area to just 0.66 hectares 'to reflect the existing townscape'.

In the Council's earlier Regulation 18 consultation, it is noted the Council proposed the allocation of 41.17 hectares of land adjacent to this site, which it initially found suitable for some 720 dwellings. This proposed site was subsequently removed from the previous Regulation 18 Plan but nevertheless shows that the Council's initial view that a large development could be located adjacent to this site, whilst also not 'reflecting the existing townscape' would suggest the larger area of land here which is 'suitable, available and achievable' remains appropriate for development and a larger allocated area here is supported.

The Housing Needs Assessment was updated in July 2025 by Edge Analytics on behalf of Canterbury City Council. Importantly this has identified a new higher figure of 1,215 dwellings per year Local Housing Need (Edge Analytics LHN Assessment Update, July 2025, paragraph 2.26). The findings suggested that whilst the demand for smaller units exists in central areas, in suburban regions a need for larger family homes is prevalent. For Market Housing, the Update found (Table 21, paragraph 4.44) the highest need was for 2, 3 and 4 bedroom dwellings.

The net annual need for affordable units has also been identified, increasing to 558 units per annum, (a significant increase up from 464 affordable homes per annum in 2021). For affordable properties, the greatest need was identified for 2 and 3 bedroom properties (Table 22, paragraph 4.48).

This Assessment maintains need for both market and affordable homes in the District and also identifies an increased need since the previous Housing Needs Assessment was carried out, suggesting increasing need across the District.

In the Emerging Plan Policy SS3, a need for 23,085 dwellings across the District has been identified. This is a significant number in a District which is battling continual delivery issues due to Stodmarsh, whereas Adisham is a very well connected settlement in a location which remains unaffected by Stodmarsh and development on site can be delivered quickly.

Under the Emerging National Planning Policy Framework, Emerging Policy S5, the Government shows clear support for housing developments within reasonable walking distance of a railway station which provides a 'high level of connectivity to jobs and services'. The somewhat arbitrary figure of top 60 TTWA (Travel to Work Area) has been referred to in the Emerging NPPF but this may change given there are questions around the out of date nature of TTWA and the fact that TTWA have significantly changed since the 1970's census data and the 2021 census data was significantly affected by the advent of COVID-19. However, the basis of the Government's approach, to focus development within walking distance of railway stations served by (or have reasonable prospect of being served by) 4 trains per hour during the daytime does remain of relevance. Adisham and the site in particular meets this criteria.

Meaningful landscape buffers can still be provided and maintained around a larger allocated site here, which will bolster the vitality of this important settlement and support the ongoing need to retain the local primary school within Adisham. We enclose an indicative layout plan that shows how a development layout of 47 dwellings sitting well within the site with significant area remaining for landscaping and BNG provision. The development is designed with the slight slope of the site in mind and retains the length of existing established hedging to Cooting Lane, maintaining the appearance of the land from the east.



*View from B2046 Adisham Road*

As can be seen from the view above from Adisham Road, the existing farm buildings on the site and dwellings on the eastern side of Cooting Lane blend into the backdrop of the landscape. The proposed development site will sit below and on the far side of these buildings with additional landscaping and this location will not be visible from the higher ground of the B2046 Adisham Road. There are no pavements along Adisham Road and therefore it is unlikely there will be more than glimpsed views of Adisham from here.

There is a Public Footpath CB190 which passes through existing trees at the southern boundary of the site for a distance of 137 metres but again this boundary is proposed to have increased landscaping to provide an improved habitat corridor and the proposed dwellings will be screened from view. Following initial approaches to Kent Footpaths Team, the proposed site offers options to improve the surface and provide lighting of this footpath, improving pedestrian connectivity through the settlement.

### *Conclusions*

The land is in single ownership and there are no known constraints to the development occurring within the first 5 years of the Plan Adoption. The site is in a sustainable location, between the Adisham Railway Station and the Adisham Primary School, which are both within an easy walking distance.

Canterbury, according to the emerging Local Plan Policy SS3, require in excess of 23,000 dwellings, a not insignificant figure. The District is severely affected by large swathes of land being within the Stodmarsh Catchment and whilst various credit systems are starting up, there are currently insufficient credits to serve such a large number of dwellings. In addition, delays around that process can be avoided here on a site which is within easy walking distance of an established mainline railway station with good connectivity for jobs and services as well as Adisham itself offering a number of facilities including a Primary School, also within easy walking distance of the site via the improved footpath CB190.

In a District struggling with ongoing housing delivery and with rising housing need figures, allocating the larger area of land here under Policy R14 would be a reasonable and supported way of achieving housing to go towards meeting that identified need along with 15 affordable dwellings to help meet identified affordable need within the District.

It is therefore requested that the proposed allocation be widened to include the whole site area submitted in the Call for Sites process be allocated for up to 47 dwellings.

Kind regards



**Jane Scott BA(Hons) Dip.TP MRTPI**

