



**Canterbury City Council
Planning Policy Team,
Council Offices,
Military Road,
Canterbury,
CT1 1YW**

21 OCTOBER 2025

REGULATION 18 LOCAL PLAN REPRESENTATIONS

LAND AT SEOTAMOT, LITTLEBOURNE ROAD, CANTERBURY (POLICY N7)

SUBMITTED BY RUBIX ESTATES LTD ON BEHALF OF THE LANDOWNERS

Dear Sir / Madam,

Rubix Estates Ltd acts for the landowners of Land at Seotamot, Littlebourne Road (Title No. K795652) in relation to the emerging Canterbury District Local Plan Focused Consultation (September 2025).

We welcome the draft allocation of the site under Policy N7 and agree that this small, well-contained parcel represents an appropriate and deliverable opportunity for residential development consistent with the Council's spatial strategy and the Sustainability Appraisal (SA) findings. The draft policy criteria are sound and achievable. The site is free from environmental constraint, has safe access to Littlebourne Road, and can deliver early in the plan period.

1. Policy N7 Context

Policy N7 identifies the site for approximately 14 dwellings, incorporating affordable and accessible homes, open space, and biodiversity enhancements in accordance with Policies DS1, DS2, DS6, DS7 and DS24 of the emerging Plan. The policy also seeks coordinated design with neighbouring land (Policy N4 – Land South of Littlebourne Road) and requires mitigation of road noise and a Minerals Assessment under the Kent Minerals and Waste Local Plan.

The allocation of Seotamot within the draft Plan is a positive recognition of the site's sustainability and deliverability. The allocation boundary corresponds with the freehold land in the ownership of our clients (Title K795652), as shown on the accompanying Location Plan. The site extends to approximately 1.17 ha (of which 0.91 ha is developable) and is previously enclosed by existing residential curtilage and vegetation, forming a logical and contained infill plot.

2. Alternative but Compatible Use – Specialist Care Accommodation (C2)

In parallel with the emerging allocation, our clients are advancing proposals for a specialist care home (Use Class C2) on the site. This would deliver a high-quality, purpose-built care facility within a landscaped setting. Such a use is classed as residential under the planning system and fully compatible with the draft allocation. It would also respond directly to Canterbury's critical shortfall in registered-care provision.

This position is reinforced by the March 2025 Whitstable appeal decision (APP/J2210/W/24/3351458), where the Inspector identified:

- A district-wide need for 274 en-suite care bedrooms, with the over-85 population 19 per cent above the national average and rising;
- A significant proportion of existing care stock not purpose-built, compounding the shortage; and
- That the district is in what was described as “a gloomy position” regarding care provision.

The Inspector concluded that a demonstrable need had been provided and that this outweighed the loss of open space, confirming that under Planning Practice Guidance 1.8 care beds equate to one dwelling. The Whitstable scheme's 80 beds therefore contributed the equivalent of 42 dwellings to Canterbury's housing supply.

Given Canterbury's current housing position (3.99-year supply and 67% Housing Delivery Test result), a comparable 80-bed facility at Seotamot would make a material contribution to both housing and specialist-care needs while maintaining compliance with the Plan's residential objectives.

3. Planning Merits and Site Delivery

The site's characteristics accord closely with the SA's findings for small, sustainable edge-of-settlement sites:

It lies within the G2: Trenley Park Woodlands Local Character Area, where opportunities exist for new landscape and biodiversity enhancements.

The site is entirely Flood Zone 1, with no ecological or heritage designations.

Access can be safely achieved from Littlebourne Road, with scope for new footway links, a pedestrian crossing, and improved bus stop infrastructure, consistent with draft criteria (N7/4a–e).

Development at Seotamot would cause no harm to strategic views or designated landscapes and would represent a modest rounding-off of existing development to the south of Littlebourne Road.

Our clients are preparing a planning application for March 2026, following the next reptile-survey window. The operator partner is an established national provider with significant capital backing, capable of delivering the scheme quickly once consented.

4. Flexibility of Allocation Wording

To reflect the district's acute need for specialist accommodation and to align with evidence referenced in the Whitstable appeal, we request a minor clarification of Policy N7 and its supporting text to confirm that:

"C-class residential uses, including specialist care accommodation, will be supported on this site where they meet identified needs and accord with the design, landscape, and access principles of Policy N7."

Such wording would preserve the Council's flexibility and ensure that the site can meet Canterbury's evolving housing and social-care requirements without altering its residential function.

5. Conclusion

Land at Seotamot, Littlebourne Road (Policy N7) is a sound and deliverable allocation consistent with the Plan's spatial strategy.

The allocation should be retained in the Submission (Reg 19) Plan. The proposed housing scheme or care home scheme would:

- Deliver a significant contribution to Canterbury's housing and care provision;
- Provide employment and community benefits;
- Achieve biodiversity net gain and landscape improvements; and
- Align with the sustainability objectives set out in the SA and Local Plan Policies DS21–DS24.

Rubix Estates Ltd and the landowners remain committed to working collaboratively with Canterbury City Council to bring forward this high-quality, landscape-led development.

Yours faithfully,

Gurdev Moore
Director
Rubix Estates

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