



RUBIX

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

By email and via online submission portal - localplan@canterbury.gov.uk

18 May 2026

Dear Sir/Madam,

**CANTERBURY DISTRICT LOCAL PLAN – REGULATION 19 PUBLICATION (MARCH 2026)
REPRESENTATIONS ON BEHALF OF THE LANDOWNERS OF LAND AT SEOTAMOT,
LITTLEBOURNE ROAD, CANTERBURY (DRAFT POLICY C17 / SLAA346)**

Rubix write on behalf of the landowners of Land at Seotamot, Littlebourne Road, Canterbury (Title No. K795652) (the “Site”) to submit representations in response to the Council’s Regulation 19 Publication Local Plan (March 2026).

The Site is allocated for residential development under draft Policy C17 for approximately 14 new dwellings, including affordable and accessible housing. Our clients strongly support the allocation. The enclosed representations are submitted on a positive and constructive basis and confirm that, in our view, draft Policy C17 satisfies each of the four tests of soundness set out at paragraph 36 of the National Planning Policy Framework and should be retained without substantive amendment in the submission version of the Plan.

The Site’s deliverability is of particular importance in the context of the Council’s acute housing supply position, as confirmed by the Inspector in Land at The Hill, Littlebourne (APP/J2210/W/25/3373183, 26 February 2026). In that decision, the Inspector recorded an undisputed Five Year Housing Land Supply of 3.62 years, a Housing Delivery Test result of 67%, and that the Council’s “most important” housing-supply policies in the adopted 2017 Local Plan are out of date. The NPPF paragraph 11d “tilted balance” is currently engaged, and from 1 July 2026 paragraph 78(c) of the NPPF will reinforce the buffer position. In this context, the retention of deliverable, low-risk allocations such as Site C17 is essential to the soundness of the Plan.

By way of summary, our representations confirm that the Site:

- Is in a sustainable urban-edge location at the District’s Principal Urban Centre, with frequent bus services on Littlebourne Road and committed Transport Strategy investment in the wider East Canterbury area;
- Is free from statutory ecological, landscape, heritage or flood constraints (Flood Zone 1) and has been confirmed by the Council’s Habitats Regulations Assessment Addendum (August 2025) as having no Functionally Linked Land potential and no likely significant effects on any European-designated site;



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- Is in single ownership and is being actively promoted by the landowners
- Will deliver a meaningful contribution to the Council's Five Year Housing Land Supply in the early part of the plan period.

We confirm that the landowners wish to participate in the public examination of the Local Plan in respect of the matters raised in these representations, and request that they be heard at the oral hearing sessions on any matter relating to draft Policy C17 and its supporting text. We have completed the Council's Regulation 19 representations form accordingly.

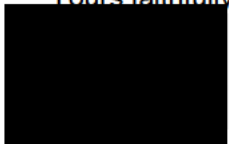
The following documents are enclosed with this letter:

- Appendix 1. Location Plan
- Appendix 2. Regulation 18 Representations (October 2025)
- Appendix 3. Title Plan and Title Register
- Appendix 4. Land at The Hill, Littlebourne Appeal Decision (APP/J2210/W/25/3373183)

The landowners and their advisors remain committed to working positively and collaboratively with the Council and look forward to engaging constructively at examination. Please do not hesitate to contact the undersigned should you require any further information or clarification in relation to these representations.

We would be grateful if you could confirm receipt of these representations and keep us informed of all subsequent stages of the Local Plan process, including the publication of any schedule of proposed main modifications, the examination timetable and any further consultation.

Yours faithfully,



Gurdev S. Moore

Founder and Director



cc: Landowners of Land at Seotamot