



CANTERBURY DISTRICT LOCAL PLAN (2042/43)

REGULATION 19 REPRESENTATIONS

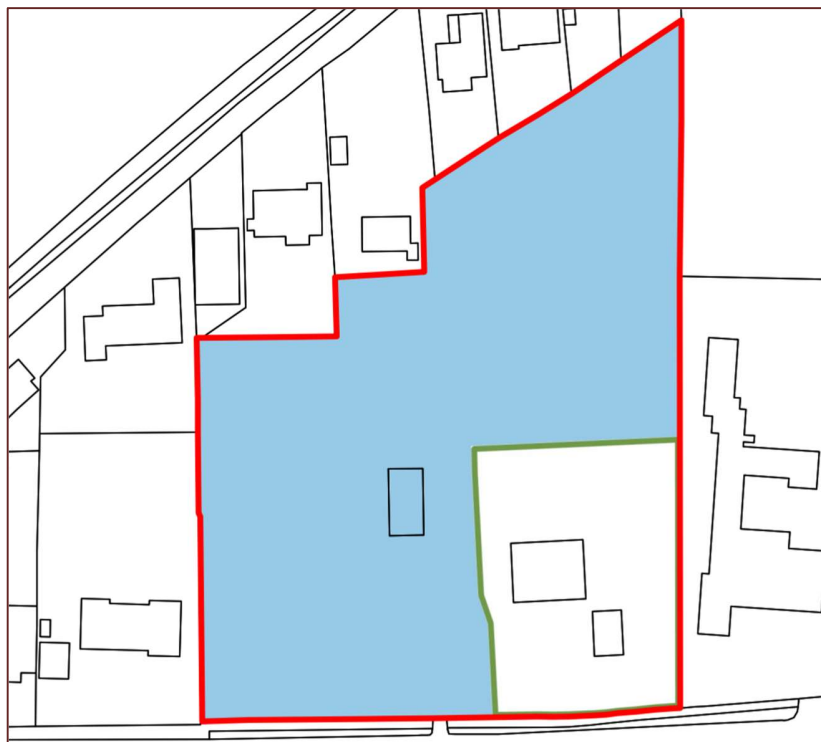
LAND AT SEOTAMOT, LITTLEBOURNE ROAD, CANTERBURY

DRAFT POLICY C17

(SLAA Ref: SLAA346 | Title No. K795652)

Prepared on behalf of the Landowners of Land at Seotamot

18 May 2026



Report Control

Project:	Land at Seotamot, Littlebourne Road, Canterbury
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2	11/05/26	DRAFT v2 (final)	GM

Executive Summary

These representations are submitted on behalf of the landowners of Land at Seotamot, Littlebourne Road, Canterbury in support of the allocation of the Site under draft Policy C17 of the Canterbury District Local Plan (Regulation 19) (March 2026) (the “Reg 19 Plan”) for approximately 14 new dwellings, including affordable and accessible housing.

In summary, we submit that:

Draft Policy C17 satisfies each of the four tests of soundness in paragraph 36 of the National Planning Policy Framework (NPPF) (December 2024) and should be retained without substantive amendment in the submission version of the Plan.

The Site is in single ownership, is free from statutory ecological, landscape, heritage or flood constraints, and is supported by strong demand from prospective developers for its delivery.

The Site is a deliverable, low risk allocation that will contribute meaningfully to the Council's Five Year Housing Land Supply in the early part of the plan period — a matter of acute importance given the Council's currently undisputed 5YHLS of 3.62 years and Housing Delivery Test result of 67% (as confirmed in the Inspector's decision letter in respect of the Land at The Hill, Littlebourne appeal (APP/J2210/W/25/3373183, 26 February 2026)).

The landowners remain committed to working positively and collaboratively with the Council to bring forward this high quality, landscape led residential development at the earliest opportunity, and request to be heard at the relevant matters at the public examination of the Reg 19 Plan.



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1. Introduction

Background

1. These representations have been prepared by Rubix on behalf of the landowners of Land at Seotamot, Littlebourne Road, Canterbury (the “Site”), in response to Canterbury City Council’s (“CCC” or the “Council”) Regulation 19 Publication Local Plan (March 2026) (the “Reg 19 Plan”).
2. The Site is allocated for residential development under draft Policy C17 – Land at Seotamot for approximately 14 new dwellings. These representations are submitted in strong support of the allocation and confirm the Site’s suitability, availability and deliverability.
3. The purpose of these representations is to assist the Inspector in considering whether the Reg 19 Plan, in respect of draft Policy C17, satisfies the tests of soundness and the requirements of legal compliance.
4. Paragraph 36 of the National Planning Policy Framework (“NPPF”) (December 2024) provides that Local Plans are “sound” if they are:
 - (a) Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs;
 - (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - (c) Effective – deliverable over the plan period; and
 - (d) Consistent with National Policy – enabling the delivery of sustainable development.
5. For the reasons set out below, draft Policy C17 satisfies each of the four tests of soundness and the allocation should be retained without substantive amendment in the submission version of the Plan.

Previous Engagement

6. Rubix, acting as agent for the landowners, submitted representations to the Council’s Focused Regulation 18 consultation in October 2025 (Appendix 2). Those representations welcomed the draft allocation of the Site (then designated Policy N7) and confirmed:
 - the Site’s suitability for the proposed development;
 - the landowners’ willingness to bring the Site forward in the early part of the plan period;
 - that a planning application could be prepared for submission without delay; and
 - multiple parties have approached the landowners seeking to assist with the delivery of the scheme.
7. The policy reference has changed from N7 (Reg 18) to C17 (Reg 19), reflecting the Site’s inclusion within the East Canterbury group of allocations. The substantive content of the policy is largely consistent with the Reg 18 version and remains appropriate.

Structure of these Representations

8. These representations are structured as follows:

- Section 2 sets out our position on the Plan's spatial strategy, the District's housing supply position, and recent appeal determined evidence on Canterbury's housing context;
- Section 3 provides an overview of the Site, the Council's SLAA assessment, and the Sustainability Appraisal findings;
- Section 4 sets out our assessment of draft Policy C17 against the four tests of soundness;
- Section 5 confirms the deliverability of the Site;
- Section 6 sets out proposed minor modifications; and
- Section 7 sets out our conclusions.

9. The following documents accompany these representations:

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| Appendix 1. | Site Location Plan (Title K795652) |
| Appendix 2. | Regulation 18 Representations (October 2025) |
| Appendix 3. | Title Register and Title Plan |
| Appendix 4. | Land at The Hill, Littlebourne Appeal Decision (APP/J2210/W/25/3373183)
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2. Strategic Context and Housing Supply

Housing Need and Plan-Wide Supply

1. The Council has used the standard method to assess its local housing need and has identified a Local Housing Need (“LHN”) of 1,215 dwellings per annum, equating to a minimum housing requirement of 23,085 dwellings over the plan period to 2042/43. We support the Council’s positive approach in seeking to meet this need in full and welcome the inclusion of a margin of approximately 10% (a total identified supply of around 25,368 new homes), in line with the NPPF’s objective of significantly boosting housing supply.

Current Housing Supply Position

2. The Council’s current housing supply position is a matter of acute importance to the soundness of the Plan, and in particular to the importance of retaining and supporting deliverable allocations such as Site C17.
3. In Land at The Hill, Littlebourne (Appeal Ref. APP/J2210/W/25/3373183, decision dated 26 February 2026) (the “Hill Appeal”), an Inspector appointed by the Secretary of State considered the Council’s housing supply position in detail. The Inspector confirmed at paragraph 98 that:

“There is no dispute between the parties that the LPA cannot demonstrate a deliverable five-year supply of housing sites in the area based on its current housing requirement. The evidence is that the LPA can demonstrate only 3.62 year’s supply of housing sites relative to its current local housing need requirement. Moreover, the 2023 Housing Delivery Test shows that the delivery of housing was at 67%. I have no reason to disagree with the agreed position of the main parties in terms of housing delivery and supply and, to this extent, paragraph 11d of the Framework is engaged.”
4. The Inspector further held that the “most important” housing supply policies in the adopted 2017 Local Plan (Policies HD4 and SP4) are out of date and attract only “limited adverse weight” in the planning balance because they are not supporting the required delivery of housing (Hill Appeal, paragraph 142). The Inspector also held that:
 - the Council’s housing supply position represents “an acute housing need in Canterbury” (paragraph 84);
 - “the Council needs to release more land for housing” (paragraph 85);
 - the supply/delivery of dwellings attracts “very significant weight” in the planning balance (paragraph 99);
 - the collective public benefits of housing delivery attract “very substantial weight” in favour of granting planning permission (paragraph 141); and
 - the older persons accommodation element of the Hill scheme is “beneficial in terms of meeting housing needs in the area” (paragraph 100).
5. It is also material that, on the eve of the Hill Appeal inquiry, the Council confirmed by email (12 November 2025) that following the consideration of a confidential report by its Planning

Committee, it had resolved not to defend any of its reasons for refusal. The Council's position thereafter aligned with the appellant's. This is a clear signal of the Council's own recognition that the housing supply position has materially shifted the planning balance in favour of housing delivery in the District.

6. The Hill Appeal is the most authoritative and most recent statement of Canterbury's housing supply context. It was determined four weeks before the Reg 19 Plan was published. The Council adopted the Reg 19 Plan against the backdrop of those findings.

Para 78(c) of the NPPF: 20% Buffer Reinforcement from 1 July 2026

7. Paragraph 78(c) of the December 2024 NPPF provides, in summary, that from 1 July 2026 a 20% buffer must be applied to a local planning authority's five year housing land supply where the housing requirement in the adopted plan was examined under a previous version of the Framework and is 80% or less of the most up-to-date standard-method LHN.
8. Canterbury currently attracts a 20% buffer by virtue of its 67% Housing Delivery Test result. While the July 2026 buffer is not cumulative with the existing HDT-driven buffer, it reinforces the policy framework's presumption in favour of deliverable allocations and against any course of action that would delay, weaken or remove sound allocations in the emerging Plan. The need for the Council to progress the Reg 19 Plan to timely adoption — and to defend its deliverable allocations at examination — is greater than ever.

Spatial Strategy

9. We support the Plan's spatial strategy of focusing development at Canterbury, Whitstable and Herne Bay, supplemented by proportionate growth at the Rural Service Centres and Local Service Centres. Within this hierarchy, modest urban edge allocations such as Site C17 – located at the urban edge of Canterbury, the District's Principal Urban Centre – represent a logical, sustainable and well evidenced component of the strategy.
10. We also support the Council's brownfield first approach and welcome that 43% of new dwellings on allocated sites are identified on brownfield or mixed land. The Site has correctly been categorised as "Mixed" in the SLAA (February 2026), reflecting its current use comprising residential dwellings, garden land, paddock space and derelict barns. The Site therefore contributes positively to the brownfield-first objective and represents a logical rounding-off of existing development on the northern side of Littlebourne Road.

Range and Mix of Sites

11. Paragraph 70 of the NPPF requires planning policies to identify a sufficient supply and mix of sites, and to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare. Site C17, at 1.17 ha (of which 0.91 ha is developable), is precisely the type of small, deliverable, edge-of-settlement allocation that the NPPF expects plans to identify. We strongly support its inclusion on this basis.

3. Land at Seotamot – Policy C17

Site Description

1. The Site comprises Land at Seotamot, Littlebourne Road, Canterbury (Title No. K795652), as shown on the Site Location Plan at Appendix 1. The Site extends to 1.17 hectares in total, of which 0.91 hectares (the “Promotion Area”) is proposed for development; the remaining 0.26 hectares comprises the existing retained residential property and curtilage.
2. The Site is located on the northern side of Littlebourne Road (A257), at the eastern urban edge of Canterbury. It is well-contained, bounded by:
 - existing residential development to the north and west;
 - the retained dwelling and curtilage to the south-east; and
 - Littlebourne Road (A257) to the south.
3. The Site lies within the G2: Trenley Park Woodlands Local Character Area and entirely within Flood Zone 1. It is free from statutory ecological, landscape or heritage designations, although the design and layout will respond positively to the setting of the St Martin’s Hospital Conservation Area to the south-west, as required by criterion 2(c) of draft Policy C17.

Sustainable Location

4. The Site is in a sustainable location at the urban edge of Canterbury, the District’s Principal Urban Centre. A regular bus service operates along Littlebourne Road, providing direct connections to Canterbury city centre, with onward connections to Canterbury East and Canterbury West railway stations and the District’s major employment, retail, education and healthcare destinations.
5. The Site lies immediately adjacent to the East Canterbury Strategic Development Area (“ECSDA”), which will deliver new walking and cycling infrastructure, a Park and Bus facility on the A257, a new bus route with bus priority measures, a local centre, a primary school, healthcare provision and substantial open space and biodiversity enhancements. The Draft Canterbury District Transport Strategy (March 2026) expressly identifies “infrastructure upgrades, including on Littlebourne Road” as part of the East Canterbury package. Future occupiers of Site C17 will benefit directly from these committed improvements.
6. In the context of the Hill Appeal, the Inspector found that a site in the village of Littlebourne, approximately 2 km from village amenities and accessed from the same A257 corridor, was “sustainably located” (paragraph 54) and not in an “isolated location” (paragraph 139). Site C17 is demonstrably more sustainably located still: it is at the urban edge of Canterbury itself, with bus stops on Littlebourne Road within a short walk, and the full range of city-centre services, employment and education within walking and cycling distance.

Strategic Land Availability Assessment (SLAA346)

7. The Site has been assessed by the Council in the Strategic Land Availability Assessment (February 2026) as Site Reference SLAA346. The SLAA records the Site's size (1.17 ha), Mixed greenfield/brownfield character, and importantly the proposed land use as "Housing (Market, Older Persons)". The SLAA confirms that the Site has been proposed as a draft allocation in the Reg 19 Plan.
8. We welcome and support the SLAA's recognition that the Site is appropriate for both market and older persons housing. This is consistent with the District's identified critical need for specialist older persons accommodation, as set out in Section 6 below.
9. We note, however, that the SLAA records the Site's technical suitability finding as:
"Site is unsuitable for the land use proposed as although there is a nearby bus service, there is no safe pedestrian and cycle access to the site from the wider area therefore future occupiers would be dependent upon private car to access day to day services... Although the site is considered unsuitable in isolation; it is considered that the site could benefit from the new walking and cycling connections provided as part of the East Canterbury Strategic Development Area."
10. We respectfully consider that this finding understates the Site's sustainability credentials and is in any event capable of being addressed through the development itself. Specifically:
 - the Site lies less than 2 km from Canterbury city centre, well within recognised cycling distance for day-to-day services;
 - existing bus stops are located within a short walk of the Site on Littlebourne Road;
 - criterion 4(a) of draft Policy C17 expressly requires new footways to connect the Site to the existing pedestrian network, which will be secured by condition and/or S106 obligation;
 - the Site will benefit from new walking and cycling connections delivered as part of the adjacent ECSDA (Policy C15), as acknowledged by the SLAA itself;
 - the Site is within walking distance of the proposed Park and Bus facility on the A257 (Policy C15); and
 - the Draft Canterbury District Transport Strategy expressly commits to infrastructure upgrades on Littlebourne Road as part of the East Canterbury package.
11. On this basis, we consider the Site is suitable, available and achievable in its own right, and that the wider East Canterbury context strengthens rather than determines its sustainability credentials. We support the Council's conclusion that the Site is correctly proposed as a draft allocation in the Reg 19 Plan. We recommend a minor textual clarification to the SLAA supporting text in due course (see Section 6).

Sustainability Appraisal

12. The Council's Sustainability Appraisal Regulation 19 Draft (February 2026), prepared by WSP, includes an appraisal of the Site at Appendix G. The Site has been identified as

performing positively against a number of SA objectives, including in particular housing delivery, access to services and sustainable patterns of development. Any residual effects can be mitigated through the design and layout requirements of draft Policy C17.

Habitats Regulations Assessment

13. The Council's Habitats Regulations Assessment Addendum (August 2025), prepared by WSP, considered the Site (recorded as N7 / SLAA346, area 1.17 ha) in relation to Functionally Linked Land potential for European-designated sites. The Addendum records the Site's FLL potential for golden plover, dark-bellied brent goose, curlew and Desmoulin's whorl snail as "None", noting that the Site is "very unlikely to be attractive to this species" and that there is "no apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC".
14. On this evidence, we are satisfied that the allocation of Site C17 will not have a likely significant effect, alone or in combination with other plans or projects, on any European-designated site within the meaning of the Habitats Regulations 2017. The allocation therefore satisfies the relevant legal-compliance test.

4. Soundness of the Allocation

1. We assess draft Policy C17 against each of the four tests of soundness in paragraph 36 of the NPPF below. For the reasons set out, we consider the policy is sound and should be retained in the submission version of the Plan without substantive amendment.

Positively Prepared

2. The Plan provides a positively-prepared strategy that seeks to meet the District's objectively assessed housing needs in full, with an appropriate margin. Within that strategy, Policy C17 makes a modest but important contribution of approximately 14 dwellings, including affordable and accessible housing, in a sustainable urban-edge location at the District's Principal Urban Centre. The allocation is consistent with the Plan's settlement hierarchy and with the focus on growth at Canterbury.
3. The allocation responds positively to the Council's acute housing supply position, as recognised by the Inspector in the Hill Appeal.

Justified

4. The allocation is justified by the SLAA (February 2026), the Sustainability Appraisal (February 2026), the Habitats Regulations Assessment Addendum (August 2025) and the Council's wider evidence base. The Site has been promoted through successive consultations (2022, 2024 and 2025) and has been assessed against reasonable alternatives. It is suitable, available and achievable; it is free from environmental constraint; and it can deliver early in the plan period. The proposed scale (approximately 14 dwellings at around 20 dph) is appropriate to the Site's context.
5. We further note that the allocation of Site C17 was carried through the Overview Committee (5 March 2026), Cabinet (18 March 2026) and Full Council without amendment and without specific objection. The contentious sites debated at Overview Committee were located elsewhere in the District. The allocation therefore enjoys cross-party support and a clear evidential foundation.

Effective

6. The allocation is effective. The Site is in single ownership, with the landowners committed to delivery. An operator partner with significant capital backing is in place. A planning application is being progressed and is anticipated for submission in 2026, following completion of the next reptile-survey window. The Site does not depend on the delivery of strategic infrastructure to come forward, and access can be safely achieved from Littlebourne Road. The Site is therefore expected to make a meaningful contribution to the Council's Five Year Housing Land Supply on adoption and in the early part of the plan period.

7. The deliverability of small-to-medium urban-edge allocations on the A257 corridor is reinforced by the Hill Appeal, where the Inspector allowed a Gladman scheme for up to 300 dwellings (including 10% older persons accommodation) at Land at The Hill, Littlebourne on the same A257 corridor. The scheme proceeded notwithstanding objections relating to landscape character, drainage, sewage, highways and heritage, on the basis that the public benefits of housing delivery attracted “very substantial weight” and significantly and demonstrably outweighed the identified planning harms.

Consistent with National Policy

8. The allocation is consistent with national policy. It reflects the NPPF’s objective of significantly boosting the supply of homes (paragraph 60), supports the requirement to identify small and medium-sized sites (paragraph 70), and promotes sustainable patterns of development in a location with access to services and public transport (paragraph 109). The policy includes appropriate criteria for design quality, heritage, noise mitigation, minerals and infrastructure, all of which are consistent with the relevant Sections of the NPPF.

Legal Compliance

9. In respect of draft Policy C17, the Plan satisfies the legal and procedural requirements for plan-making, including in relation to the Duty to Cooperate, Sustainability Appraisal and the Habitats Regulations Assessment. The HRA Addendum (August 2025) confirms no likely significant effects on any European-designated site arising from the allocation of Site C17, alone or in combination.

5. Deliverability

1. Deliverability is central to the Inspector's assessment of soundness, particularly given the Council's undisputed Five Year Housing Land Supply of 3.62 years. We set out below the key factors confirming that Site C17 is deliverable within the meaning of Annex 2 of the NPPF ("available now, in a suitable location for development now, and achievable with a realistic prospect that housing will be delivered on the site within five years").

Availability

- The Site is in single ownership under Title No. K795652.
- The landowners have actively promoted the Site through the plan-making process since 2022, with representations submitted at successive consultation stages.
- The landowners are willing and able to bring the Site forward in the early part of the plan period.

Suitability

- The Site is in a sustainable urban-edge location at the District's Principal Urban Centre.
- It is free from statutory ecological, landscape, heritage or flood designations (Flood Zone 1).
- The HRA Addendum (August 2025) confirms no FLL potential and no likely significant effects on European sites.
- Access can be safely achieved from Littlebourne Road (A257), with scope for new footway links, a pedestrian crossing and improved bus stop infrastructure consistent with draft Policy C17 criteria.
- The Site has been assessed by the Council's SLAA, Sustainability Appraisal and HRA evidence base.
- The Hill Appeal provides Inspector-tested support for the proposition that small-to-medium A257 corridor sites are sustainably located for residential development.

Achievability

- An established national operator partner with significant capital backing is in place.
- A planning application is being prepared for submission in 2026, following completion of the next reptile-survey window.
- The proposed scheme (approximately 14 dwellings at around 20 dph, including affordable and accessible housing) is appropriate to the Site's context.
- No abnormal viability or infrastructure constraints have been identified that would prevent delivery within the first five years of the plan period.
- The Site is not dependent on the delivery of any strategic infrastructure to come forward.

2. On this basis, the Site fully meets the Annex 2 definition of “deliverable” and can confidently be relied upon by the Council to contribute to the Five Year Housing Land Supply on adoption and throughout the early part of the plan period.

6. Conclusion

1. These representations have been prepared on behalf of the landowners of Land at Seotamot, Littlebourne Road, Canterbury, in response to the Council's Regulation 19 Local Plan (March 2026).
2. We strongly support the allocation of the Site under draft Policy C17 for approximately 14 new dwellings, including affordable and accessible homes. The Site:
 - lies in a sustainable urban-edge location at the District's Principal Urban Centre;
 - is free from statutory ecological, landscape, heritage or flood constraints;
 - attracts no likely significant effects on any European-designated site under the HRA;
 - 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 on adoption — critical given the undisputed 3.62 year supply position confirmed in the Hill Appeal;
 - represents a logical rounding-off of existing development at the eastern edge of Canterbury; and
 - will deliver biodiversity, landscape and infrastructure benefits in accordance with the Plan's development management policies.
3. Draft Policy C17 has been positively prepared, is justified by a proportionate evidence base, is effective and deliverable, and is consistent with national policy. The allocation should be retained without substantive amendment in the submission version of the Plan.
4. The Council's housing supply position is one of acute concern. The Inspector in the Hill Appeal (26 February 2026) confirmed an undisputed 5YHLS 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. From 1 July 2026, paragraph 78(c) of the NPPF reinforces the buffer position. In this context, the retention of deliverable, low-risk allocations such as Site C17 is essential to the soundness of the Reg 19 Plan.
5. To reflect the City's acute need for specialist accommodation, the site can respond to evolving housing and care requirements.
6. The landowners and their advisors remain committed to working positively and collaboratively with the Council to bring forward this high-quality, landscape-led residential development at the earliest opportunity. We request that the landowners be heard at the public examination on any matter relating to draft Policy C17 and its supporting text.

Gurdev Moore **Founder and Director**

On behalf of the Landowners of Land at Seotamot

18 May 2026

Appendices

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

Summary of Appeal Decision APP/J2210/W/25/3373183 (26 February 2026)

An appeal by Gladman Developments Limited against the refusal by Canterbury City Council of outline planning permission (CA/23/00484) for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation at Land at The Hill, Littlebourne, CT3 1UX was allowed by Inspector D Hartley on 26 February 2026.

Key findings of relevance to Land at Seotamot (Policy C17):

Para 4: The Council resolved on 11 November 2025 not to defend any of its reasons for refusal. The Council's position thereafter aligned with the appellant's, with both parties considering that the proposal would, on balance, be acceptable in planning terms.

Para 84: "The evidence is that the site is needed to meet an acute housing need in Canterbury".

Para 85: "The evidence is that the Council needs to release more land for housing".

Para 98: Common-ground 5YHLS at 3.62 years; HDT result 67%; NPPF paragraph 11d tilted balance engaged.

Para 99: Housing supply and delivery attracts "very significant weight" in the planning balance.

Para 100: Older persons accommodation (10% of the scheme) is "beneficial in terms of meeting housing needs in the area".

Paras 110–111: The DLP allocation (Policy R7 — carried forward as Policy R9 in the Reg 19 Plan) is a material planning consideration, with weight increasing as the Plan advances.

Para 141: Collective public benefits of the scheme attract "very substantial weight" in favour of granting planning permission.

Para 142: Policies HD4 and SP4 of the adopted 2017 Local Plan are "most important" policies for the supply of housing but are "out of date", and attract only "limited adverse weight" in the planning balance.

Para 143: The planning harms, including identified conflict with the adopted development plan, are "significantly and demonstrably outweighed" by the identified benefits of the proposal.

[The full Inspector's decision letter is available at <https://acp.planninginspectorate.gov.uk/> under reference APP/J2210/W/25/3373183 and may be appended in full if preferred.]