



Defence Infrastructure Organisation

12th May 2026

Representations to Canterbury City Council Draft Canterbury District Local Plan: Regulation 19 Consultation

Prepared and submitted by Defence Infrastructure Organisation

To whom it may concern,

Introduction

Defence Infrastructure Organisation ('DIO') has prepared these representations in accordance with the current Regulation 19 Consultation Draft of the Canterbury District Local Plan being held by Canterbury City Council ('CCC').

This representation is relevant to the DIO's landholdings within the Borough, namely land at 'Old Park Training Area' ('Site 1') and Border House / Tabard House ('Site 2'). These are shown in Figure 1 below.

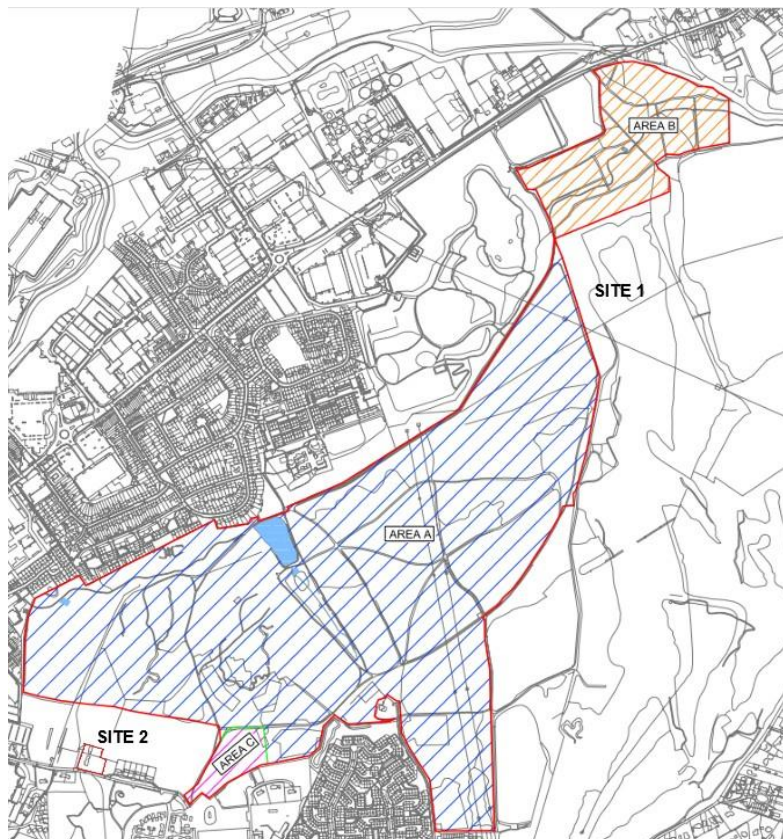


Figure 1: Sites Location Plan

Background

As you may be aware the Defence Infrastructure Organisation (DIO) is seeking to establish the foundation for the 'right-sized' military estate of the future. There is a strong military imperative that the quality and performance of the Defence estate must be enhanced in order to sustain, and in places, improve, military capability. Given current and future funding pressures, this can only be achieved if the estate is significantly smaller and more efficiently utilised, in order to achieve the best value for money from Defence funds. As part of this exercise MOD is considering the future of Old Park Training Area, approximately 92 HA of land to the east of Canterbury which falls within the local plan area. In addition, the MOD is considering the future of surplus dwellings and land at Border House and Tabard House on Chaucer Road, Canterbury.

DIO's role is to steward the Defence estate to ensure it is appropriately sized, fit for purpose and delivers best value for the public purse. Old Park Training Area and Border House and Tabard House no longer serve an operational military function and its rationalisation forms part of the MOD's wider estate optimisation programme. Importantly, any capital receipts arising from redevelopment would be reinvested in the operational Defence estate.

The release of this land therefore represents an opportunity to bring forward publicly owned, surplus sites in a sustainable location at the edge of Canterbury, capable of delivering multiple Local Plan objectives within a single, comprehensive framework.

Old Park Training Area was submitted in the Strategic Land Availability Assessment (SLAA) for consideration for a variety of uses. It is noted that the SLAA deemed the site as not suitable for further consideration, stating "half of the site is located in a SSSI and there are concerns regarding landscape and ecology impact". Following discussions with Canterbury District Council MOD reserved their position but did not pursue an allocation for residential development on any part of the Old Park Training Area site at that time.

Site Context

Old Park Training Area ('Site 1')

The Old Park Training Area is 92Ha in size. The site is made up of several different character areas containing unmanaged woodland and scrubland. The topography also plays a significant part in the site.

The site is situated in a highly accessible location in the context of Canterbury. Area B is accessed from Sturry Road, and the whole site is highly accessible to both Canterbury train stations – approximately 1 mile to each station. There are also good bus services along the A257 (southern access to the site), which provides access to bus route 11, 23A and 43. As such, the site is well positioned to be accessible by car and public transport.

There are no listed buildings on the site and it is not part of a designated Conservation Area. Old Park Training Area contains the Chequers Wood and Old Park Site of Special Scientific Interest (SSSI), which could remain undeveloped.

The site is located predominantly in flood risk zone 1. There are however some small-scale watercourses through the site, but due to the topography of the site, there are no associated floodplains so flooding is not going to be a future issue and should not stifle redevelopment proposals.

The site is under full Ministry of Defence (MOD) freehold ownership and has been declared surplus to military requirement. The site is already largely vacant from military use (although remains available for driving training) and disposal will likely take place from July 2026.

Border House and Tabard House ('Site 2')

This site comprises two, two-storey residential buildings which are now vacant and which have fallen into disrepair, situated in relatively large plots adjacent to Chaucer Road (site area c.3.9ha). The buildings are set back from the road, and screened from neighbouring plots by trees and planting.

There is woodland to the north and to the south the other side of Chaucer Road. There are residential properties c.70m east and c.140m west, separated by trees and gardens.

The properties are not listed nor within a Conservation Area and there are no identified water features within the site. A review of the EA Flood Map for Planning shows the entirety of the site within Flood Zone 1 (low risk), including calculating for 2070-2125 climate change. This map also shows there is low likelihood of surface water flooding for a 1 in 30, 1 in 100 and 1 in 1000 annual likelihood of a surface water flooding event.

The properties have been vacant for some time and are surplus to requirements. Disposal will likely take place from July 2026.

Location of existing housing to south and west

Residential Development

MOD supports the Draft Local Plan setting out Canterbury as the principal focus for growth within the settlement hierarchy (Policy SS3) and development within the urban area of the city (Policy C9).

Sites 1 and 2 are demonstrably well related to the existing urban area, being directly adjacent to established residential neighbourhoods and located between the Canterbury Urban Area and the East Canterbury Strategic Development Area. They provide the opportunity for sustainable development which meets housing needs.

Following previous submissions to the Local Plan process, MOD reserve their position but no longer intend to pursue an allocation for residential development on any part of the Old Park Training Area site at this point in time.

Nutrient Neutrality and Strategic Mitigation

Land totalling approximately 11.5 HA within Area B of Old Park Training Area in our location plan has been included within Draft Policy R23 – Land to the south of Sturry Road for the purposes of providing a strategic wetland to fulfill the need to offset the impact of development on phosphate and nitrogen levels at Stodmarsh as identified in the Canterbury Nutrient Mitigation Strategy.

As the owner of part of the land subject to this allocation MOD is supportive of the draft policy and welcomes further discussions regarding this matter. Area B of Old Park Training Area is a key enabling site for nutrient neutrality, and MOD suggests the Local Plan should refrain from treating mitigation and development as wholly separate spatial choices.

Biodiversity, Landscape and Green Infrastructure

MOD supports the Draft Local Plan's strong landscape-led and biodiversity-led approach. Old Park Training Area (Area A) has the scale and configuration to deliver enhanced ecological connectivity with Old Park and Chequer's Wood and other nearby assets, substantial green infrastructure buffers and publicly accessible open space; and long-term habitat management secured in perpetuity.

It is noted paragraph 6.124 sets out that while there are *'numerous areas which could provide the opportunity to improve biodiversity...At this stage the information available is not targeted enough to require safeguarding in the Local Plan as there are a range of approaches to meeting the priorities identified.'* MOD suggests Area A of Old Park Training Ground could provide a strategic contribution to BNG across the District, and welcomes further discussion on this point.

Conclusion

Sites 1 and 2 represent an opportunity to bring forward publicly owned, surplus sites in a sustainable

location at the edge of Canterbury, capable of delivering multiple Local Plan objectives within a single, comprehensive framework.

DIO therefore respectfully requests that the Council give further consideration to the role these Sites can play in ensuring the Local Plan is **sound, deliverable and consistent with national policy**.

MOD trust the above will receive your full consideration and we would also be grateful if notification of any consultation on further stages of the plan could be sent to DIOODC-TownPlanning@mod.gov.uk and copied to [REDACTED]

Should you have any queries regarding the above please do not hesitate to contact me.

Yours Faithfully,

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