

Policy Team
Canterbury City Council
14 Rose Lane
Canterbury
CT1 2UR

Via email only: consultations@canterbury.gov.uk

14 May 2026

Dear Sir/Madam,

Re: Draft Canterbury District Local Plan – Regulation 19 Consultation Response

We are writing on behalf of our client, Lidl Great Britain Limited (Lidl), in response to the Regulation 19 consultation on the Draft Canterbury District Local Plan.

Lidl is a substantial and growing presence in the UK convenience retail market, with over 1000 stores currently trading and more than 35,000 employees. The business is investing significantly in the UK, including 600 million pounds this financial year as part of its ongoing expansion programme. Lidl is actively delivering new stores nationwide to meet its objective of opening 50 new stores in the next 12 months.

Lidl's stores bring a wide range of benefits to the communities they serve. These include:

- Providing high quality products at the lowest possible prices;
- Delivering a modern and convenient shopping experience for local residents;
- Improving customer choice in the areas where they trade;
- Constructing buildings of sustainable, high-quality design with well-integrated landscaping; and
- Creating around 40 new jobs per store, aligned with the Living Wage Foundation rate for all eligible employees, and without the use of zero-hour contracts.

Lidl has a significant interest in bringing forward new stores within Canterbury District Council and wishes to ensure that the emerging Local Plan facilitates sustainable retail investment and aligns with national planning policy.

Lidl welcomes the preparation of a new Local Plan and support the Council's intention to provide a sound and effective planning framework. However, they wish to make representations on the Biodiversity Net Gain matters, which it is considered require further refinement to ensure the plan is positively prepared, justified, effective, and consistent with national policy as set out in the National Planning Policy Framework (NPPF, 2024).

Biodiversity Net Gain

Policy DS25 (Supporting biodiversity recovery) point 3 b) identifies that *"Major developments must deliver 20% Biodiversity Net Gain. This is made up of a 10% statutory net gain and a 10% local net gain. The 10% statutory net gain must be in accordance with the hierarchy set out below, however for the purposes of the 10% local net gain, the council will apply points 4(b) (ii), (iii) and (iv) of the hierarchy flexibly."*

For reference, point 4(b) of Policy DS25 states that *"For qualifying developments, a Biodiversity Net Gain Plan must be submitted to demonstrate the hierarchy has been followed, including the subsequent values within the metric: i) avoid or minimise biodiversity impacts; ii) on site net gain*

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provision; iii) off-site net gain provision within the district; iv) purchased biodiversity credits for proposals within the district."

Lidl does not agree with this approach and considers that the mandatory 10% biodiversity net gain figure should be adopted within Policy DS25.

The additional local 10% requirement is considered to be disproportionately onerous, particularly in light of the significant costs and practical burdens already associated with delivering the mandatory 10% Biodiversity Net Gain. Furthermore, criterion iii) of the Policy can be difficult to satisfy in practice, as it is contingent upon the availability of registered habitat bank sites within a defined geographical area. This is further complicated by the fact that the specific habitat types being lost cannot always be appropriately offset within the available habitat bank sites.

In this context, it is considered that the proposed requirement for 20% biodiversity net gain, subject to viability set out within Policy DS25 is not positively prepared, justified, effective, or consistent with national policy as set out in the National Planning Policy Framework (NPPF, 2024).

A 10% biodiversity net gain target should be identified so as not to overburden developers, in an environment where there are numerous pressures on scheme delivery.

Summary

Lidl very much support the progression of a new Development Plan for Canterbury District. However, it is important to ensure that the Development Plan adopts a pro-active approach to development, acts as an enabler to development and does not overly burden developers. The policies within the Development Plan must also be considered 'sound' so that it can pass through the plan examination process.

The comments set out within this letter of representation have been framed in this context. Lidl hope that these comments can be considered on an appropriate basis and are useful to the Council in progressing its new Development Plan.

Please could written receipt of these representations be provided. In addition, my client would like to be kept informed and notified about the on-going Local Plan process.

Yours sincerely,

Rapleys LLP

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