

Planning and Development

Ask for: Timothy Bailey

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Mr A Thompson
Planning Policy Manager
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Our Ref: CDLP-05/26

Date: 15th May 2026

Dear Mr Thompson,

Draft Canterbury District Local Plan 2042/43 (Regulation 19)

Thank-you for inviting Ashford Borough Council (ABC) to comment on the draft Canterbury District Local Plan 2042/43 (Regulation 19).

The Council has now had the opportunity to review the consultation document and supporting evidence; and wish to make the following comments and/or observations:

Plan Period

The Council acknowledges and supports the proposed changes to the plan period from 2020/21-2040/41 to 2024/25-2042/43, aligning with the requirement in the National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG) to ensure a plan lifetime of at least 15 years at adoption.

The revision of the plan period has necessitated the need for a reassessment and recalculation of the district's development requirements to 2042/43, which are responded to in turn below.

Development Requirements and Spatial Strategy

Housing

The Council supports Policy SS3 (*Development Strategy for the District*) that sets out the development requirements and preferred spatial strategy, which aims to steer future development to the most sustainable settlements within the District with the principal focus being Canterbury and the urban areas of Whitstable and Herne Bay.

In particular, the Council supports and welcomes the fact that the draft Canterbury Local Plan intends to meet the minimum housing requirement of 23,085 dwellings to 2042/3 as calculated using the standard method in full and within the district's administrative boundaries.

Additionally, The Council supports the inclusion of a stepped housing trajectory to ensure a plan-led approach to development. This approach aligns with the accompanying transport strategy, which seeks to phase development alongside the release of capacity on the road network through upgrades to park-and-ride facilities and major bus-led network improvements. It also contributes to the delivery of a more robust and defensible five-year housing land supply in accordance with NPPF requirements.

The Council also acknowledges and supports the confirmed shift in strategy away from freestanding strategic sites at the University of Kent and Hollow Lane. Instead, the housing previously envisaged for these locations will be delivered through a broader portfolio of small and medium-sized sites, contributing to a more dispersed and flexible pattern of growth. This approach is considered to offer greater resilience and deliverability, reduce reliance on a limited number of complex sites, and enable development to come forward more responsively in line with local infrastructure capacity and community needs.

Employment

In respect of employment land, it is observed that Policy SS4 (Economic Strategy for the District) seeks to allocate sites and grant planning permissions for a minimum of 123,705 of employment floorspace in line with the 'labour demand' scenario.

The Council notes that the draft Canterbury Local Plan allocates circa 120,000 sqm of new employment floorspace in addition to the 118,000 sqm and 4.5ha allocated in, and proposed to be carried forward from, the adopted 2017 Canterbury District Local Plan. Whilst no concerns are raised in principle with the proposed employment strategy at this time, the Council observes that the plan could deliver a significant over-supply of the minimum requirement identified by the Labour Demand Scenario in overall quantitative terms. The Council accepts the need to plan positively for growth and that this isn't unduly constrained by a lack of site capacity; however, it will continue to monitor the current position and give consideration as to how this may fit into Ashford's employment strategy as part of preparation of its own future Local Plan to 2042/43.

Retail

In respect of retail, it is also observed that Policy SS4 (Economic Strategy for the District) seeks to grant planning permissions and the allocation of sites for a minimum of 4,416 sqm of retail uses in line with the Canterbury Retail Needs Assessment 2025 which now forecasts a need for 4,416 sqm floorspace for retail use.

The Council is supportive of the proposed 'city-centre-first' retail strategy, prioritising the protection and consolidation of Canterbury city centre as a sub-regional shopping, leisure and visitor destination. The strategy recognises structural changes in retail markets and focuses on adapting underperforming sites and encouraging a broader mix of uses rather than pursuing large-scale retail expansion.

Gypsy and Traveller Accommodation

The Council acknowledges Policy SS3 (Development Strategy for the District), which sets out a requirement for 43 Gypsy and Traveller pitches, including a need for 22 pitches within the first five years (to 2028/29), in accordance with the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA). The Council is supportive of the proactive approach taken by Canterbury in allocating a sufficient range of sites, comprising both new allocations and extensions to existing sites, including a significant new site at Whitstable, to ensure a deliverable five-year supply of traveller pitches. This is further strengthened by the inclusion of a positive and permissive windfall policy.

Infrastructure

The Council has previously raised concerns regarding the provision of healthcare infrastructure, particularly the uncertainty surrounding developer contributions towards new or improved health facilities, including the Kent and Canterbury Hospital. This included specific concerns about the potential implications for the A28 corridor, and the diversion of healthcare resources, particularly in relation to the William Harvey Hospital.

The Council notes the removal of the reference to a ‘new or improved Kent and Canterbury Hospital’ from Policy SS5 (Infrastructure Strategy for the District), which has been replaced with a broader requirement for a ‘new healthcare facility and improvements to existing health infrastructure provision’. The Council welcomes the greater clarity provided in draft Policy DS15 (Infrastructure Delivery), which requires development that generates a need for new or enhanced infrastructure to either provide land or secure funding through Section 106 or CIL mechanisms. This includes provision for a new healthcare facility within the East Canterbury Strategic Development Area.

The Council also supports Policies CF1 and CF11, which carry forward provisions from the 2017 Local Plan relating to the potential future relocation of the Kent and Canterbury Hospital within the South Canterbury allocation, and/or the safeguarding of land adjacent to the existing site to enable potential future expansion.

Stodmarsh

The Council supports Canterbury City Council’s Nutrient Mitigation Strategy (2026) and recognises the importance of a coordinated, catchment-wide approach to addressing phosphorus and nitrogen impacts on the Stodmarsh designated sites.

The Canterbury District Nutrient Mitigation Strategy builds on the framework established by the Stodmarsh Nutrient Mitigation Strategy (2025), which sets out a comprehensive programme of measures. It provides a clear, sequential approach that prioritises on-site mitigation while enabling effective off-site solutions where necessary.

Ashford Borough Council welcomes the continued partnership working with Natural England, the Environment Agency, and other stakeholders to deliver a mitigation credits scheme,

ensuring that development can proceed without adverse effects on the integrity of the Stodmarsh SAC, SPA and Ramsar site.

Stour Valley Regional Park

The Council highlights draft Policy SS1 (*Environment Strategy for the District*), criteria 10, which makes reference to the City Council working with partners to promote a 'Stour Valley Regional Park'.

The Council acknowledges that the scale and location of a new proposed regional park is yet to be determined, but would welcome the opportunity to be involved in any future discussions with the City Council in moving forward in order to help tackle any cross-boundary issues that may result as a consequence of any future Regional Park designation.

Broad Oak Reservoir

The Council wishes to place on record its support for Policy R24 (*Broad Oak Reservoir and Country Park*), which proposes the creation of a new reservoir at Broad Oak.

The reservoir is supported through South East Water's emerging Water Resources Management Plan; and will play a crucial role in helping to relieve issues related to water supply/scarcity within the East of Kent.

Yours sincerely,

Timothy Bailey

Deputy Team Leader Plan Making and Infrastructure