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planning

Representations to the Draft Canterbury District Local Plan (2042/43)

Omission Site: Land west of Herne Bay Road, Sturry

Canterbury District Council – Draft Submission Local Plan – Regulation 19 Consultation
(March 2026)

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1. Introduction and Scope of Representations

- 1.1 Our client (Fairfax Acquisitions Ltd) ("FAL") has a controlling interest **in land located to the west of Herne Bay Road, Sturry (Strategic Land Availability Assessment ("SLAA") Ref: SLAA315, hereafter referred to as 'The Site', which affords a sustainable location in providing for approximately 130 dwellings** along with associated landscaping and public open space.
- 1.2 The Site has previously been promoted through the Call for Sites Exercise undertaken by the Council and is currently the subject of a pending outline application for up to 127 dwellings (LPA ref CA/25/02361), validated by the Council on 23rd December 2025.
- 1.3 The information supplied in support of the pending planning application¹ is referenced in this submission, as it reaffirms our clients view of the suitability and deliverability of the site, especially since it demonstrates key steps are in progress to enable its development at the earliest opportunity.
- 1.4 Following its promotion through the earlier call for sites exercise, the site is assessed within the Council's latest SLAA (February 2026) under site reference SLAA315. Within the SLAA, the site is not regarded as suitable as:

There is concern regarding the impact of the site on the character of the local area and the surrounding landscape. The site is located in an area with poor pedestrian access to public transport therefore future occupiers would be dependent upon private car to access day to day services.

- 1.5 However, for the reasons explained in this statement (having regard to the evidence submitted alongside the pending application), the discounting of the site for the above reasons is not justified. This is especially as other sites around Broad Oak are included as allocations in the Draft Submission Plan even though they have poorer pedestrian access to the public transport services compared to our clients site, which is accessible to the bus stops on Herne Bay Road for the services² with five buses each hour towards Herne Bay and Canterbury. This does not negate the existing pavement adjoining Herne Bay Road which already provides the necessary safe pedestrian access together with the potential off the provision of a pedestrian refuge on Herne Bay Road³ to enable users to reach the bus stop on Canterbury bound services without needing to walk past the Fox Lane roundabout.
- 1.6 Furthermore, these representations highlight a need for the identification of further sites which as explained should include our client's site at Sturry. This is especially given the flawed inclusion of a stepped housing requirement which delays the provision of housing in the district which conflicts with the clear objectives in Government policy of seeking to boost supply at the earliest opportunity (NPPF paragraph 61). The Council's reliance upon sites allocated in the existing Local

¹ See **Appendices 9-16**.

² 600, 601 and 602 (copies of timetables in **Appendix 7**)

³ As referenced in paragraph 5.1.2 of the Transport Assessment submitted for the pending application (**Appendix 15**)

Plan where delivery has been delayed compounds the conflict of the draft Submission Plan's in significantly boosting housing supply. Whilst some additional sites are proposed for inclusion in the Plan, this is insufficient to achieve the consistent level growth targets set by the Government. Further sites should therefore be included as allocations, such as our clients site in Broad Oak/Sturry where the submission of an application for up to 127 dwellings provides clear evidence to demonstrate its deliverability credentials. This must be recognised as a clear benefit of the site and its role in addressing the significant housing needs of the area.

- 1.7 The allocation of the Site for approximately 130 dwellings would be well related to existing services in the settlement and the wider area, especially with the enhancement to local facilities which have not been recognised in the Council's own assessment. In addition, the Site is well contained from wider views into and from the settlement, the morphology of which has also altered on account of the existing and committed built form of the village. Furthermore, the Council's assessment has discounted the changes to the character of the area associated with the delivery of the reservoir to the north of Broad Oak (proposed in Draft Policy R24) alongside its role and function in providing clear containment of the settlement. Additional, as explained, the Council assessment of sites around Broad Oak is inconsistent and had this occurred our clients site would have been included as an allocation.
- 1.8 The current draft Local Plan fails to include our client's Site as a housing allocation. Accordingly, and for the reasons explained in our representations, including on account of failing to provide for the identified housing needs, **the draft Local Plan does it comply with the tests of soundness at paragraph 36 (see also paragraph 16) of the NPPF (Dec 2024).**
- 1.9 **To address these matters, further sites must be identified and allocated for residential development**, which, for the reasons specified in this statement (and the earlier submissions), should **include our client's land west of Herne Bay Road, Sturry**. Given the pending outline application for up to 127 dwellings on the site (LPA ref CA/25/02361), it can contribute towards delivery of housing in the district in the short term, which is an important benefit of the proposal given the national housing crisis and the significant housing delivery shortfalls of the plan area.
- 1.10 The Government guidance on site assessments is clear that where insufficient sites have been identified, **"strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites"**.⁴
- 1.11 As the PPG makes clear, **"Where constraints have been identified, the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the National Planning Policy Framework and the adopted or emerging development plan, which may affect the suitability of the site"**⁵. As indicated in the representation, the Council must revise the settlement boundaries, including for Broad Oak and Sturry and in doing so can readily identify further sites.

⁴ Housing and Economic Land Availability Assessment" section of the PPG under sub-heading "What happens if the assessment indicates that there are insufficient sites/ broad locations to meet needs?" (ID ref 3-025-20190722).

⁵ "What happens when constraints are identified that impact on the suitability, availability and achievability?" sub-heading in the "Housing and Economic Land Availability Assessment" section of the PPG (ID ref 3-021-20190722).

- 1.12 This review of settlement boundaries should be undertaken alongside its reconsideration of the spatial strategy, especially given that this is the reason why the site has currently been discounted notwithstanding the favourable review of comparable sites around Broad Oak and Sturry in the SLAA.
- 1.13 Furthermore, the Council's categorisation of settlements is unjustified since it has not considered of changes in service and facilities provision which has occurred together with that committed in the Plan including through the implantation of planning permissions. There is also the failure to adequately recognise the ease that a location (Broad Oak) is readily accessible through pedestrian links to neighbouring area, including through the provision of well-lit pavements as illustrated between Sturry station and Broad Oak along Herne Bay Road. This means that the station⁶, existing primary school⁷ and the cluster of retail/commercial buildings⁸ (including butchers, convenience store and café) are readily accessible to residents of Broad Oak alongside those of Sturry.
- 1.14 The NPPF (paragraph 83) emphasises the interconnectivity of villages where they are a focus for their surrounding area which is clearly illustrated by the ease of accessing the services in Sturry and Broad Oak given the lit pavements connecting them. Furthermore, whilst the NPPF (paragraph 110) references the differences in options for sustainable transport solutions between urban and rural areas, as explained and detailed further in this submission, Herne Bay Road already has frequent public transport services with five buses hourly linking Sturry and Broad Oak to both Canterbury and Herne Bay. This is supplemented by the hourly rail service from Sturry station towards London (via Canterbury) and Ramsgate.
- 1.15 FAL has a strong belief in the principle of the plan-led system, and in setting out our representations upon the draft Local Plan, we hope to be able to work with the Council between now and the formal submission of the draft Local Plan pursuant to Regulation 22 of The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended), to ensure that the Local Plan satisfies the tests of paragraph 36 of the NPPF.
- 1.16 Our representations propose several changes to certain policies within the draft Local Plan, which must be addressed prior the Council's agreement of a draft Submission Plan together with its subsequent submission for examination by the Secretary of State. This will both ensure that the Plan is sound and can effectively provide for the development needs of Canterbury District throughout an appropriate plan period.
- 1.17 As set out in the NPPF, Local Plans must be capable of delivering from the point at which they are adopted.
- 1.18 This means scrutinising the policy wording to ensure the plans are sound and that the allocations contained therein are capable of being delivered at the point envisaged. This is particularly the case in relation to the need for Council to collate a robust evidence base to justify the imposition

⁶ Around 1,200m from our clients site

⁷ Around 1,200m from our clients site

⁸ Convenience store, butchers and café west of Herne Bay Road between its junctions with Rupert Way and Popes Lane (Buddy's retail park) which are within 400m (5 minute walk) of the site and other parts of Broad Oak

of certain policies and/or their wording so as not to overburden and/or stifle sustainable and appropriate development.

- 1.19 In this instance, the **draft Local Plan needs to be amended to make it sound and to ensure it robustly plans for the delivery of sufficient housing to address a housing requirement established in accordance with national planning policy and guidance.**

Land west of Herne Bay Road, Sturry (SLAA Site Ref: SLAA315).

- 1.20 As detailed in these representations, the inclusion of the land west of Horne Bay Road, Sturry (SLAA Ref: SLAA315) as a baseline housing allocation for approximately 130 dwellings will make an important contribution towards addressing the housing needs within the Plan area especially given its inherent sustainability resulting from its location adjoining the village of Broad Oak which contains services including village hall and shop alongside access to further facilities including primary school, additional retail together with high quality bus and rail services to neighbouring towns from Sturry, which as explained are within walking and cycling distance of the site.
- 1.21 In the context of the Plan area, Broad Oak and Sturry as existing villages with important services for day to day living is appropriate for growth which is recognised by the inclusion of allocations for residential development within the existing and draft submission plan. Nonetheless, given the inherent need for housing across the district, it is essential that all appropriate opportunities for boosting housing supply area included particularly as the draft submission plan unjustifiably advanced a stepped requirement, deferring the resolution of the national housing crisis.
- 1.22 The interlinked communities of Broad Oak and Sturry collectively function as a key centre for access to shops, village hall, employment & recreational opportunities and primary education together with stops on bus and rail services already functions as a rural service centre for surrounding communities. The Council's "Rural Settlement Review" recognising the pre-eminence of Sturry above the other comparable settlements through its comprehensive and extensive range of facilities including the only library outside of the three main settlements in the district (Canterbury, Herne Bay and Whitstable). On this basis is should be categorised alongside the other most sustainable locations in the district and consequently a focus for growth consistent with its pre-eminence categorisation in the existing Local Plan (Policy SP4). With the clear relationship of Broad Oak with Sturry including the proximity of the two places and the ease of pedestrian access along well-lit pavements means that they should be identified as a key location for growth, consistent with the strategy of the existing Local Plan (site 2 allocated in policy SP3).
- 1.23 As highlighted earlier in this section, the NPPF (paragraph 83) highlights the need for planning policies to **"identifying opportunities for villages to grow and thrive, especially where this will support local services"**. As indicated, the interlinked communities of Broad Oak and Sturry already serve this role and the approach of the emerging Plan should actively support and enhance this through allowing further growth, including on our clients land.
- 1.24 The NPPF emphasis the vital importance of significantly boosting the supply of housing (NPPF paragraph 61) and that the outputs of the standard method provide the base appraisal of housing need which must be achieved. The draft Submission Plan includes a stepped housing requirement which defers achievement of the overall standard method for determining needs until the end of

the Plan. This is the antipathy of the clear objective of the Government to significantly boost the supply of housing (NPPF paragraph 61) which underpins the approach of the NPPF, particularly given their commitment to address the national housing crisis.

- 1.25 The Council's assumptions of delivery from existing and proposed allocations in the Plan overly optimistic and therefore the emerging Plan should provide for further sites to ensure that collectively the wider obligations are achieved.
- 1.26 The enclosed Illustrative Masterplan No. 2504-PL08 Rev J (**Appendix 10**) has been informed by an evaluation of the sites' key influences and opportunities, as well as pre-application advice sought from the LPA (LPA Ref: PRE/25/00008).
- 1.27 The submitted proposals (LPA Ref: CA/25/02361⁹) have been designed to respect and respond to the existing ecological features of the site such as the trees and hedgerows alongside levels, as well as the relationship of the development to the surrounding current and committed built context and settlement edge, including that arising through delivery of the other sites around Broad Oak.
- 1.28 The form, quantum and disposition of development within the Site have been informed by the existing landscape and the views of the Council's Landscape Officer, taking a sensitive approach to the settlement edge, which includes a landscaped buffer to the Site boundaries.
- 1.29 The proposals highlight the opportunity for new public open spaces, recreation spaces and ecological enhancement.

Scope of Representations

- 1.30 Our client's representations upon the draft Local Plan can be summarised as relating to the following Policies.

Policy	Representation
Policy SS2: Sustainable Design strategy for the District	Objection
Policy SS3: Development Strategy for the District	Objection
Policy SS7: Local Plan Review	Objection
Policy R1: Rural Service Centres	Objection
Policy R13: Local Service Centres	Objection
Policy R20: Countryside	Objection
Policy R24: Broad Oak Reservoir and Country Park	Objection
Omission site – land west of Herne Bay Road, Broad Oak	Objection

- 1.31 In preparing the representations upon the Draft Canterbury District Local Plan (2042/43) document (March 2026) prepared by the Council, we have considered the following evidence-base documents:

- Sustainability Appraisal of the Draft Local Plan

⁹ See information in **Appendices 9-15**.

- Strategic Land Availability Assessment (SLAA) (2026)
- Topic Papers prepared by the Council including "Development Strategy" and "Meeting Development Needs".
- Infrastructure Delivery Plan
- Rural Settlement Review 2023
- Local Development Scheme (March 2026)

1.32 We have also considered the following figures and publications:

- National data sets including Median Workplace based affordability ratios and the results of the 2021 Census.
- Advice from the Government with respect to preparation of Local Plan and correspondence regarding interventions in the process.
- Adopted Local Plans of other authorities including Ashford Borough Council, Fareham Borough Council and Reigate & Banstead Borough Council
- Report of the Canterbury Joint Transportation Board meeting on 24th March 2026 concerning "Highways Forward Works Programme 2024/25 and 2025/26"
- Documents prepared by South East Water for their Early Engagement on the Broad Oak Reservoir consulted upon from 4th February until 18th March 2026¹⁰.
- National Research on lead in timeframes and delivery rates for housing sites
- Monitoring data compiled by Canterbury District and central Government.
- Appeal decisions for development in Canterbury District and elsewhere.

¹⁰ <https://www.southeastwater.co.uk/about/our-plans/broad-oak-water/> (copy of masterplan for reservoir included as **Appendix 5**)

2. The NPPF Tests of Soundness

General

- 2.1 Section 3 of the NPPF (December 2024) sets out the principal components that need to be included in Local Plans. Paragraph 36 requires that to be “sound” a Development Plan Document (“DPD”) should be positively prepared, justified, effective and consistent with national policy.
- 2.2 A positively prepared plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other Authorities so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.
- 2.3 In order to be justified, the future draft Submission Local Plan under Regulation 19 must have an appropriate strategy, considering reasonable alternatives and be based on proportionate evidence.
- 2.4 Effective means that the document must be deliverable over the plan period and based on effective working on cross-boundary strategic matters that have been dealt with rather than deferred and evidenced by the statements of common ground.
- 2.5 **For the reasons set out in these representations, there are several shortcomings with the Plan that result in the need for amendments to make it sound.**
- 2.6 **The amendments we think are necessary to make the Local Plan sound can be summarised as follows:**
- **The need to change the housing requirement to a consistent 1,215dpa throughout the Plan period thereby ensuring the emerging plan is consistent with the Government’s planning advice and policy.**
 - **Revisions to specific policies of the Local Plan to ensure better alignment of the strategy with the evidence base including the treatment of Broad Oak and Sturry in the settlement hierarch together with clarification of the measures to be actioned to address housing land supply shortfalls.**
 - **Land west of Herne Bay Road, Broad Oak/Sturry (SLAA ref: LAA315) should be allocated as a baseline allocation for approximately 130 dwellings.**
- 2.7 We remain committed to further engagement with the Council to explore how the allocation of the site will support the deliverability credentials of a future submitted Local Plan alongside demonstrating its consistency with national policy.
- 2.8 The remainder of this submission is focused on providing responses to the Council’s draft policies in the Local Plan.

- 2.9 Whilst the representation is focused on the key changes advocated to the plan and the associated reasoning having regard to the tests of soundness¹¹, we recognise that further revisions to the Plan are essential to ensure consistency, albeit that these may not all be covered in this representation. This is because it is focused on parent policy which establishes the area of concern to which the soundness issues relate.

¹¹ NPPF paragraph 36.

3. Policy SS2: Sustainable Development Strategy for the District

- 3.1 The draft plan indicates that schemes which result in new communities of 300 or more dwellings should provide a range of services and facilities to residents pursuant to criterion 5. The supporting text to the policy (paragraph 1.32) however indicates that this requirement applies to any residential scheme of this size. This inconsistency on what types of residential scheme are subject to the additional requirements also arises in criterion 8. The approach of the plan is therefore inconsistent as to the requirements for schemes exceeding the thresholds in criteria 5 and 8 and the additional information required. This illustrates that the document is neither justified nor effective.
- 3.2 Whilst criterion 8 suggests that a scheme of 100 or more dwellings could function as a new community, the hierarchy in the Local Plan requires settlements to contain a base service provision to be regarded as a sustainable location. Such an approach reflects the advice in NPPF paragraph 83 regarding the importance of supporting provision of facilities where they support the provision or enhancement of services to their immediate hinterland.
- 3.3 A free-standing scheme of 100 dwellings is very unlikely to include a sufficient package of facilities to ensure sustainable behaviours are achieved, although this can be met where they already operate and are well located to a site. This is illustrated by the proximity of our clients site at Broad Oak to existing retail facilities in the village and nearby in Sturry (Buddy's retail park off Herne Bay Road). The approach of the draft Plan does not recognise this distinction nor explain the rationale for the scheme size thresholds outlined.
- 3.4 Furthermore, criterion 8 of the draft policy requires the preparation of a masterplan in collaboration with the community on any scheme for new communities of 100 or more dwellings. Such an obligation conflicts with the clear guidance in the Council's Statement of Community Involvement (SCI) which is clear that applicants are encouraged to engage with local residents and other groups/bodies before the submission of an application. The requirement of this criterion is more onerous than that specified in the SCI and also departs from the clear advice in the NPPF (paragraph 41) that they can encourage such engagement but cannot obligate this where it exceeds that required by law.

Changes sought to the Plan

- 3.5 Policy SS2 is currently unsound for the following reasons:
- a) It is not **justified** as the approach does not reflect the evidence nor is based upon proportionate evidence.
 - b) Not **effective** as not deliverable, and
 - c) Not **consistent with national policy** as does not accord with the advice in NPPF paragraphs 41 and 83.
- 3.6 The changes to policy SS2 therefore advocated are (additions shown in bold with deletions struck through):

- a) That criterion 5 is amended to read:

*New communities of more than 300 homes **where not within or adjoining an existing settlement as listed in the District's Settlement Hierarchy** should **demonstrate how they** contain accessible community and mobility hubs to reduce the need to travel by private car for day-to-day services and facilities. Within such proposals community facilities, healthcare, education, older persons housing, shopping and business uses should be co-located at the heart of the development, within or next to the community hub, and provided early within the development.*

- b) The criterion 8 is amended to read:

***The Council encourages that new** ~~New~~ communities of more than ~~100~~ **1,000** homes **are accompanied by** ~~will require~~ a masterplan, prepared in collaboration with the community and be subject to a design review during the design process. New communities of more than 300 homes, or multi-phased residential developments will also be required to produce a design code. Design codes will be secured through planning condition and should be developed through effective community engagement and reflect community aspirations for development in the area.*

- c) That paragraph 1.32 is amended to read:

*New developments over 300 dwellings **should demonstrate how they** ~~are expected to provide at least one community hub and one mobility hub to contribute to sustainable and accessible communities, which may include~~ **increased provision and/or enhanced access by sustainable modes to** local shopping, healthcare and education uses*

4. Policy SS3: Development Strategy for the District

- 4.1 This policy details the hierarchy of settlements across the district, the nature and level of growth which is considered appropriate together with the overall development requirements including a stepped housing target. The representations in this statement concerning the acceptable scale and types of development appropriate in the "Rural Service Centres" and "Local Service Centres" are covered in the sections relating to the specific policies – R1 and R13. The representation to this policy should be read alongside these elements and the changes to the policy advocated below are advanced to ensure consistency across the plan.
- 4.2 In summary, our starting point is that we dispute the reasonableness and soundness of the proposed plan period and its consistency with the obligation to provide a strategic policy for at least 15 years post adoption¹².
- 4.3 National policy as set out in the NPPF is clear that the derivation of the housing requirement must accord with the clear methodology stated (paragraph 62).
- 4.4 For Canterbury District, the Government indicates that **the minimum annual housing need is for at least 1,215 dwellings annually**. Whilst this is reflected in target for the first year of the plan, thereafter a stepped requirement is advanced. The reasoning for this is explained in paragraphs 2.18 to 2.47 of the "Development Strategy" Topic Paper which contends (paragraphs 2.27 & 2.28) that there are insufficient deliverable sites in order to ensure a five year housing supply can be demonstrated is a level requirement of 1,215dpa was included.
- 4.5 As paragraph 2.28 of the Draft Plan suggests, based upon the Council's phasing assumptions and available planning information it does not consider that there are sufficient suitable sites to boost supply in the short term. This is disputed by our client especially as the underlying philosophy of the Government is to significantly boost the supply of housing as stated in paragraph 61 of the NPPF. The Council should consider every opportunity for this to be achieved which includes the fulfilment of the minimum requirement of at least 1,215 in every year of the Local Plan period. The failure to achieve this expectation is a clear indication that the Local Plan is unsound as it is neither **positively prepared** nor **consistent with national policy**.
- 4.6 The Planning Practice Guidance within the chapter on "Housing and Economic Land Availability" is clear that **"Where constraints have been identified, the assessment will need to consider what action could be taken to overcome them"**¹³. This consideration of how constraints can be overcome applies to the achievement of the minimum requirement every year (especially in the early phases) alongside across the entire plan period. This is because the PPG Guidance in the "Housing Supply and Delivery" chapter emphasises that they should **"not seek to unnecessarily delay meeting identified development needs"**¹⁴ as part of the wider advice on the acceptability of stepped targets. For the reasons detailed, this is a clear consequence of the Council's approach as their own "Phasing Methodology" referenced in the "Development Strategy" Topic Paper is

¹² NPPF, paragraph 22.

¹³ ID ref 3-021-21090722.

¹⁴ ID ref 68-021-20190722.

clear that sites with pending planning applications would be delivered in whole or part within the subsequent five years. This is especially the case where the site is the subject of an application for up to 500 dwellings. As explained in the omission site representation, this acknowledgement of the inherent delivery timescales of clients site (as a scheme with a pending outline application for between 100 and 499 dwellings) would provide completed dwellings within the next five years¹⁵.

- 4.7 Section 10 of this representation details why the Council's discounting of our clients land at Sturry is unjustified and why it must be included as an allocation. We reference the omission site in the representation to policy SS3 since it is a clear indication that the Council have unjustifiably excluded sites from its supply which can deliver within the next five years thereby negating their justification for the stepped housing target. This is therefore a clear illustration that the Draft Local Plan has not been positively prepared nor consistent with national policy as not seeking achievement of the Government's objectives of significantly boosting the supply of housing at the earliest opportunity.
- 4.8 Furthermore, whilst the policy references the role of permissions and allocations for the achievement of the requirements, it omits the Council's reliance on windfalls as a source. A clarification of the policy is included in the revisions suggested.
- 4.9 The approach of the policy, especially with respect to the guidance for development in the countryside (criterion 8) is more restrictive than that detailed in chapter 15 of the NPPF. Whilst the draft policy seeks protection of the rural character, the NPPF (paragraph 187) is clear that this approach only applies to in those cases listed in criterion a. Outside the defined set of locations covered by paragraph 187 a), criterion b is clear that recognition is the aim as part of the overall balancing exercise which underpins the NPPF. The approach of the plan is therefore inconsistent with national policy.

The Plan Period

- 4.10 Table 1 below shows the information from the Councils' current Local Development Scheme ("LDS") (March 2026) relating to the programme for adoption of the emerging Local Plan for the steps from the consultation on the Proposed Submission version of the plan (as detailed in Appendix 1).

Table 1: Extract from the timetable in LDS (March 2026)

Stage	Date
Pre-Submission preparation and consultation (Regulation 19)	Nov 2025 – May 2026
Pre-Submission procedures, Submission to Secretary of State (Regulation 22) and Independent Examination Hearing	May 2026 – Oct 2027
Adoption (Regulation 26)	Nov/Dec 2027

- 4.11 The timetable within the LDS does not distinguish the expected submission date for the Local Plan and the associated length of the examination. The formal consultation on the Proposed Submission version of the Plan is taking place from 23 March until 18 May 2026 which is within

¹⁵ Table 4 indicates that where outline application under consideration, the phasing assumption is for first completions within year 4.

- the expected period. Although the LDS does not specify the expected programme for the submission of the Draft Plan for examination, we note that the Report to the Council's Cabinet which sought approval of the document for the current consultation indicated that this is expected to occur in September. This would be reasonable given the need to collate and analyse the representations made.
- 4.12 However, assuming submission occurs in September, the timetable indicates that the report of the Inspector would be received 13 months later so that adoption would occur 15 months after submission. This is an unrealistic timetable for the examination of the Local Plan.
- 4.13 Although the period between the consultation and submission might be reduced, from May to September is only four months which is the minimum feasible period for the collation and summarisation of the representations together with agreement of any corrections to the draft plan. Such a view of the extent of the period from consultation to submission reflects the performance achieved by comparable strategic local plans prepared elsewhere in England.
- 4.14 Our comparison of the examination timetables of other strategic plans has reviewed those prepared since the NPPF (2018 and subsequent versions) confirmed the role of Standard Method in establishing housing requirements (from 25th January 2019 as detailed in paragraph 227 of the NPPF (December 2023)). The December 2024 version includes a revised method for determining Local Housing Need, to which local authorities are obligated to achieve (NPPF (December 2024), paragraph 62).
- 4.15 The Government publishes data on the progress of examining Local Plans¹⁶ which indicates that for the 82 plans submitted for examination since 24th January 2019 and found sound on or before 8th April 2026, there was on average over 2 years and 5 months¹⁷ between publication and the document being found sound. It also shows an average of nearly 1 year and 10 months¹⁸ between submission for examination and the document being found sound. Since adoption cannot occur until after the Plan has been found sound, this will therefore occur later.
- 4.16 The average period from commencement of the consultation through to formal submission was therefore over 7 months. If the Plan is submitted in September 2026, this would be only 6 months after the consultation started. Whilst this could be achieved (and is accepted as such) it is unlikely to be any faster given the complexities in the process and the performance of other authorities as detailed in the analysis of the Government's statistics. Nonetheless, as explained we have applied the September 2026 as a feasible date for the submission of the draft Plan for examination albeit it is marginally quicker than achieved elsewhere.
- 4.17 As indicated, the Council expects that the examination through to receipt of the Inspector's Report could take just 13 months whereas for other authorities this has taken on average nearly 22 months. This is therefore a clear indication that the Council's timeframe is not realistic given that they have only allowed less than two thirds of that achieved by others. Whilst there could be scope

¹⁶ <https://www.gov.uk/government/publications/local-plan-monitoring-progress>

¹⁷ 884 days

¹⁸ 654 days

for a shortened examination, it is not considered that this would be to the extent assumed by the Council.

- 4.18 It is therefore clear that **the timeframes envisaged by the Council are not realistic with the period from submission to receipt of the Inspector's Report going to be closer to the average of nearly 22 months rather than around 13 months as explained above** and implied in the LDS.
- 4.19 Whilst the Government anticipates accelerated examinations of Local Plans as part of the wider 30 month timeline for their preparation, this applies to documents to be prepared under the auspices of the Levelling Up and Regeneration Act 2024 which applies to those submitted after 31st December 2026. Consequently, **the timeframe assumed by the Council to achieve adoption in November/December 2027 is considered optimistic.**
- 4.20 It is more realistic to expect receipt of an Inspector's Report in June 2028, with adoption in July or August 2028. This is on the assumption that submission does occur in September 2026. Any delays will result in a corresponding adjustment to the expected timeframe for receipt of the Inspector's Report.
- 4.21 The NPPF (paragraph 22) is clear that strategic policies in Local Plan should look ahead for a minimum of 15 years from adoption. With a realistic adoption date in Summer 2028, the plan period should cover at least from April 2029 through to March 2044 as the monitoring of the effectiveness of its policies are typically undertaken based on broadly financial years (from 1st April through to the following 31st March). This necessitates an extension of the plan period through to 2044, rather than 2043 as currently advanced.
- 4.22 The Council's Development Strategy Topic Paper (Table 2.1) details the data which is relied upon to determine the district's housing requirements consistent with the guidance in the PPG. It is noted that the average workplace based affordability ratio and the dwelling stock information were those published during 2025¹⁹. This should consequently be the starting point for the plan period given that the PPG enables examinations of plans to rely upon the output of the standard method for 2 years²⁰. This therefore means that the start point of the plan period should be 2025 rather than 2024 as indicated in the consultation document.

Housing Requirement and the Plan Period

- 4.23 Taking account of these considerations, we therefore advocate that the Plan period as outlined in Policy SS3 should be amended to cover from April 2025 through to March 2044. Such a refined plan period would mean that the starting point also aligns with the latest and up to date information on the components of housing land supply as detailed in the Strategic Land Availability Assessment (SLAA) (2026) alongside the "Meeting Development Needs" Topic Paper.
- 4.24 This section of the representation has explained why a stepped requirement is not justified given there is scope (consistent with the evidence in the "Phasing Methodology" (2023) research) for

¹⁹ 26th March 2025 for affordability ratios and 22nd May 2025 for dwelling stock.

²⁰ ID ref 2a-008-20241212 in the "Housing and Economic Development Needs Assessments" section.

the inclusion of addition sites providing up to 499 dwellings which would boost supply to enable achievement of five year supply based upon a level requirement. For the reasons detailed in section 10 of this representation, this can include our clients land at Sturry.

- 4.25 It is recognised that Sturry relief road had been an obstacle to boosting housing supply given its key role in improving connectivity along the A28 corridor between Sturry and Canterbury. However, as the “Canterbury Joint Transportation Board” meeting on 24th March 2026 confirms,²¹ **“construction remains on track to commence in spring 2026, with expected completions in early 2028. The first stage of archaeological investigation is now complete”**. Therefore, this clearly indicates that the previous uncertainty over delivery timeframes has been address which means that the Council must explore every opportunity to boost supply, especially given that the output from the calculation of Local Housing Need is a minimum.

Robustness of Supply

- 4.26 The information Appendix 6 of the in the Local Plan indicates that 25,407 dwellings are expected for delivery between April 2024 and March 2043. This compares to the need for 23,085 dwellings. Whilst this is a surplus of 2,322 dwellings, several changes must be made to this. Firstly, as detailed above, since the derivation of the Local Housing Need was undertaken based upon the data available in 2025, this is the starting point, The completions which were achieved in the district between April 2024 and March 2025 (i.e 1,232) should be omitted.
- 4.27 Secondly, whilst the “Meeting Development Needs” Topic Paper includes Statements of Common Ground²² with the respective promoters and developers of sites allocated in the existing Plan, several only outline the position on lead in times and delivery rates up to March 2030²³. However, for Site 1 (Land south of Canterbury), the trajectory in the Topic Paper indicates that delivery will substantially increase from the current peak of 200dpa (2029/30) to 300 dpa (2030/31-2041/42). This is not justified as it this build rate is neither confirmed by the Statement of Common Ground for the site in Appendix D and as importantly, the Council’s “Phasing Methodology” indicates that typically comparable schemes achieve 160dpa. Although it is noted that it suggests up to 300dpa is feasible, this is subject to the number of outlets and level of affordable housing. Independent research by Lichfields indicates²⁴ that comparable sites to the land south of Canterbury typically deliver at between 100 and 188 dwellings annually. For these reasons, the expectation for delivery from this site should be reduced by 1,050 dwellings so that peak is kept at 200dpa from 2029/30 onwards.
- 4.28 The unjustified build rates are replicated in that advanced by the Council for several of the draft allocations. This is illustrated by the expectations where the build rates exceed those envisaged in the Phasing Methodology. For the land at Merton Park (allocation C10 for 1,950 dwellings), 1,755 dwellings are expected in the Plan period. The trajectory in the Topic Paper shows delivery of 200dpa from 2034/35 to 2039/40 whereas the Phasing Methodology suggests 120dpa would be

²¹ See Appendix D in “Highway Forward Works Programme 2024/25 and 2025/26” update included as **Appendix 6**.

²² Appendix D

²³ Site 1 (Land at South Canterbury (Mountfield Park)), Site 3 (Land at Hillborough (Parcel A)), Site 5 (Land at Strode Farm) and Site 6 (Land at Greenhill)

²⁴ Figure 4.1 in Start to Finish (3rd edition) (March 2024) (See **Appendix 4**)

more typical. However, for pragmatism we have used 150dpa. This reduces expected supply at this site by 105 dwellings.

- 4.29 Overall, the reduction from just these adjustments would be 2,387 dwellings²⁵. As this is more than the contended surplus of 2,322 dwellings (referenced in paragraph 4.23 (above)), the Plan is inadequate in achieving the minimum housing requirements.
- 4.30 As already explained, the Council has failed to adequately consider the role that sites which accommodate up to 499 dwellings can make to their supply, especially where, like our clients site they are subject to an application. The application of the "Phasing Methodology" indicates that sites with applications can deliver dwellings within 5 years, where they accommodate no more than 499 dwellings. The failure to actively consider such sites is an illustration that the Plan was not positively prepared nor consistent with national policy (through the failure to significantly boost the supply of housing).

Changes to policy SS3

- 4.31 The draft policy as currently written is unsound for the following reasons:
- a) Not **positively prepared** as it delays the achievement of the wider Government objectives of significantly boosting the supply of housing. This is through the inclusion of the stepped requirements alongside the inclusion of limitations on the acceptability of locations for development;
 - b) Not **justified** as the expectations of delivery from the various sources are not supported by appropriate evidence,
 - c) Not **consistent with national policy** in failure to provide for the minimum 15 years post a realistic and justified adoption date, not contributing towards boosting the supply of housing at the earliest opportunity and imposes restrictions beyond those specific in NPPF paragraph 187.
- 4.32 The changes necessary to address these soundness matters are (additions shown in bold with deletions struck through):
- a) The criterion 1 of the policy is amended to read:

*Between 2024/25 **April 2025** and 2042/43 **March 2044** provision is made through ~~the granting of planning permission and the allocation of sites~~ for a minimum of 23,085 new dwellings (**equating to 1,215 dwellings per year**) including affordable housing, older persons housing and a range of sizes and types of housing to meet local needs. As part of this, 43 pitches for gypsy and traveller accommodation over the plan period.*
 - b) That criterion 2 and the subsequent table are omitted.

²⁵ 1,232 (completions 2024/25) + 1,050 dwellings (land south of Canterbury) + 105 dwelling (land at Merton Park).

- c) That criterion 6 is amended to read (subject to the consequential changes to the categorisation of Sturry as explained in the response to policy R1):

Sturry, Blean, Bridge, Chartham, Hersden and Littlebourne are identified as Rural Service Centres.

Within the boundaries of these settlements new development will be supported on suitable sites, and existing community facilities, including within the designated Village Centres, will be protected and enhanced to support the vitality of these important rural settlements, in line with Policy R1.

- d) That criterion 7 is amended to read (subject to the consequential changes to the categorisation of Broad Oak as part of the wider Sturry location as explained in the response to policy R13):

Adisham, Barham, Broad Oak, Harbledown, Hoath, Lower Hardres, Petham, Rough Common, Stuppington, Westbere and Wickhambreaux are identified as Local Service Centres.

Within the boundaries of these settlements limited development ~~which protects their rural character~~ will be supported on suitable sites, and existing community facilities will be protected and enhanced to support the vitality of these important rural settlements, in line with Policy R13.

- e) That criterion 8 is amended to read (to ensure consistency with the revisions advocated to policies R1, R13 and R20)):

*Within the countryside, which is defined as any part of the district outside of the settlement boundaries of the Urban Areas, Rural Service Centres and Local Service Centres, **recognition** ~~priority~~ will be given to **the intrinsic** ~~protecting the rural~~ character of the district.*

*In this context, appropriate agriculture and viticulture development will be supported while housing will only be supported in very limited circumstances where specified within this plan **including as indicated in policies R1, R11 and R20**. Existing community facilities within the countryside will be protected, while new and improved facilities and other forms of non-residential development will be supported where these meet the specific requirements of other policies in this plan.*

- f) That further sites are included as allocations, including our clients land west of Herne Bay Road, Broad Oak/Sturry.

5. Policy SS7: Local Plan Review

- 5.1 Policy SS7 details the scenarios within which an early review of the Local Plan will be instigated. Whilst this is acknowledged, it is not considered that the approach of the Plan provides sufficient clarity on how the Council will undertake the monitoring and as important what the timelines for the release of the assessments will be. In this context, we refer to the approach of Reigate & Banstead Borough Council and policy MLS1 of their adopted Development Management Plan²⁶. This details the programming for the Council's publication of their assessments of five year supply together with the commitment to publish appraisals for the monitoring periods just past and the next consecutive year. This is important as it details the remit of the appraisal process and how this can be used to inform the judgements in the adequacy of supply.
- 5.2 The draft policy whilst instigating the process for an early review, does not provide further guidance beyond the nationally required 5 yearly reviews pursuant to the Local Plan regulations²⁷. This contrasts with the emphasises in the approach of Reigate & Banstead referenced above. Although it is acknowledged that the revisions detailed in the representations to Policies R1 and R13 explain the approach to boosting housing supply should shortfalls arise²⁸, it is also vital (consistent with Reigate & Banstead) to provide guidance on the timeframes for the publication of five year housing land supply appraisals. This is therefore covered in the revisions to the policy.
- 5.3 Furthermore, although the Reigate & Banstead policy details the timescales for the respective five year supply assessments it is also important to provide further explanation of what a significant change in the requirements would be to facilitate an expedited local plan review.

Changes to policy SS7

- 5.4 The policy as drafted is unsound for the following reasons:
- a) The policy is not **positively prepared** as it hinders the achievement of the housing targets,
 - b) It is not **effective** as it will not ensure that the Plan delivers the necessary development,
 - c) It is not **consistent with national policy** as it hinders the boosting of the supply of housing as obligated by NPPF paragraph 61.
- 5.5 The changes therefore necessary to address the identified concerns are detailed below (additions shown in bold with deletions shown struck through).

²⁶ Extract in **Appendix 1**

²⁷ Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2010 (as amended) and Paragraph 7 of the Schedule in The Town and Country Planning (Local Planning) (England) Regulations 2026

²⁸ The inclusion of flexible policies consistent with those of Ashford borough or Fareham Borough (see extracts of policies in **Appendices 2 and 3** (respectively).

5.6 That in policy SS7:

- a) Criterion 1 is omitted.
- b) That clause a in criterion 3 is amended as follows:

*housing needs have changed **by at least 10%** significantly since the adoption of the plan*

- c) That clause b in criterion 3 is amended as follows:

***The housing delivery test results for two consecutive years** ~~and/or five year deliverable housing supply forecasts~~ mean that the council is under the NPPF presumption in favour of sustainable development ~~for three consecutive monitoring years, or~~*

The Council's will publish annually in July each year assessments of five year housing supplies for the April of that year and the consecutive year to demonstrate the position. Where the assessment for either the current or consecutive year shows deficits in five year supply, the approach in policy R20 will apply until the updated appraisal issued in July of the next year. Where the assessments for two consecutive appraisals issued in July show five year deficits in at least three of the four dates reviewed, the early interim review of the Plan will commence as set out in criterion 6 of this policy.

- d) That Criterion 5 is amended as follows:

*When a full periodic review or an interim review is completed, the council will publish its findings though its annual Authority Monitoring Report **by December of that year.***

- e) That criterion 6 is amended as follows:

*Where a review confirms that policies require updating, the council will publish the scope and timetable for the update in its Local Development Scheme **alongside its annual Authority Monitoring Report** ~~at the earliest opportunity.~~*

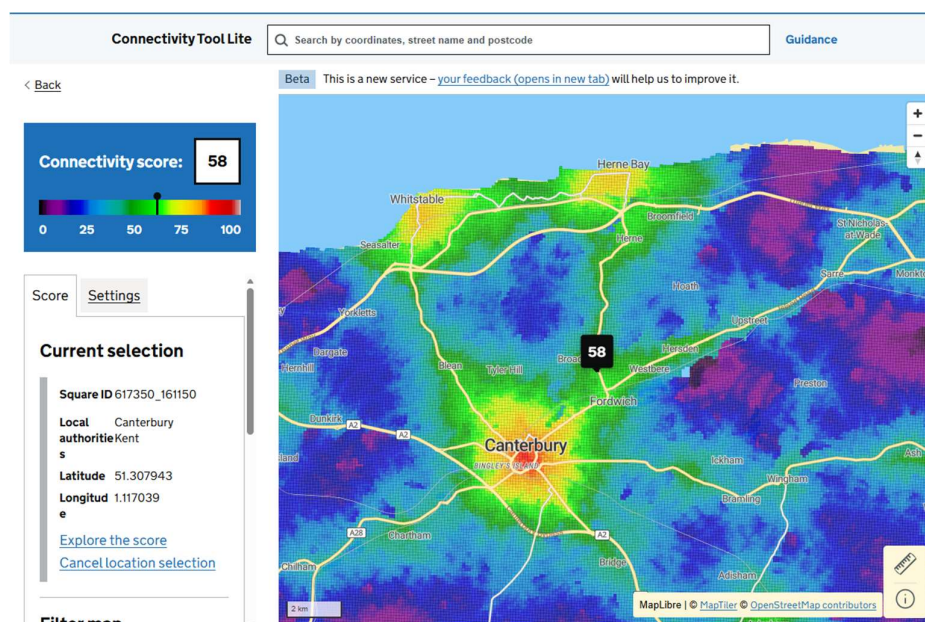
6. Policy R1: Rural Service Centres

- 6.1 Policy R1 details the approach to development at the Rural Service Centres, the categorisation of which compared to the existing Local Plan is explained in the Rural Settlements Study 2023 and the Development Strategy Topic Paper. Unlike the existing Local Plan, Sturry has been included in the same settlement tier as Blean, Bridge, Chartham, Hersden and Littlebourne. This however discounts the more extensive range of services and facilities available in Sturry compared to the other locations, especially as it contains some²⁹ which are only found in the three main settlements of the district – Canterbury, Herne Bay and Whitstable. This pre-eminence is not reflected in the hierarchy.
- 6.2 The NPPF (paragraph 83) recognises that villages should be included within the overall strategy for growth, especially where they provide a focus for accessing services in their area. This is illustrated by Sturry with this greater range of facilities, which have and continue to be enhanced through the implementation of allocations in the existing Local Plan. These enhancements include provision of additional retail facilities at Buddy's retail park on Herne Bay Road alongside the committed primary school and Sturry station improvements arising from the scheme on site 2 in policy SP3 of the current Local Plan. The quality of the existing facilities and their commitment for enhancements indicate that this should be a location for further growth, including areas which are readily accessible.
- 6.3 The NPPF (paragraph 110) recognises that the opportunities for sustainable transport will vary between urban and rural areas. Sturry is currently served by five buses each hour towards Canterbury and Herne Bay³⁰ which is complimented by the hourly rail services which head into London via Canterbury or to Ramsgate. Such a quality of service is amongst the best available in the more sustainable locations given the comparisons provided by the connectivity tool compiled by the Department for Transport. This is shown in the extract below which confirms the sustainability credentials with a score of 58³¹. The quality of service is therefore indicative of a location with greater opportunities for access to sustainable transport.

²⁹ i.e. library

³⁰ Routes 600, 601 and 602 as detailed in **Appendix 7**.

³¹ Based upon the score for Buddy's retail park, Herne Bay Road, Sturry



Extract of the Connectivity WebTool from Department for Transport (centred on Buddy's retail park, Herne Bay Road, Sturry)

- 6.4 As Sturry is amongst the most sustainable locations in the district, the hierarchy in the proposed plan does not reflect this unlike the approach of the existing plan.
- 6.5 Alongside the failure to recognise the sustainability credentials of Sturry, the approach of the plan hinders the potential for additional growth which can therefore take advantage of the existing and committed facilities and services in the area for the achievement of lifestyle behaviours which embed these principles. This is especially given the limits imposed by the draft policy on the scale of development in the location.
- 6.6 The limits to the scale of development in Sturry and other rural service centres alongside conflicting with the approach in NPPF paragraph 83 since this is clear of the need to support growth in such places, especially where they contribute towards supporting or enhancing existing services. Whilst the proposed plan includes some allocations, the approach prevents further schemes beyond those within the limits set.
- 6.7 Whilst the response to policy R20 details the approaches of other authorities³², these indicate the acceptability of proportionate development adjoining settlements in specific circumstances and for consistency these should be allowed within the guidance in policy R1.

Changes sought to the Plan

- 6.8 Policy R1 is currently unsound for the following reasons:

³² As illustrated in the approach of policy HOU4 of Ashford Borough or policy HP4 of Fareham Borough (see **Appendices 2 and 3** respectively).

- a) It is not **justified** as the approach does not reflect the evidence, especially regarding the higher level of access to facilities in Sturry compared to other locations.
- b) Not **consistent with national policy** as does not accord with the advice in NPPF paragraphs 83 and 110.

6.9 The changes to policy R1 therefore advocated are (additions shown in bold with deletions struck through).

- a) The Sturry should be included in a higher tier than the other rural service centres to reflect the availability of services.
- b) The clause b in criterion 1 is amended to read:

The redevelopment ~~of previously developed land, including at first floor level or above existing commercial or community premises, where this is of a scale and form appropriate to the size and character of the settlement.~~

- c) The clause c in criterion 1 is deleted.

7. Policy R13: Local Service Centres

Context

- 7.1 Policy R13 details the approach to development at Local Service Centres, the categorisation of which compared to the existing Local Plan is explained in the Rural Settlements Study 2023 and the Development Strategy Topic Paper. Whilst the categorisation is recognised, unlike other evidence collated for the plan, the Rural Settlement Study which underpins the approach is not up to date as it fails to reflect the existing facilities which is readily available to residents (within walking distance) especially where these have been enhanced since the appraisal. This is illustrated by the opening of a Tesco convenience store at Buddy's retail park, Herne Bay Road, Sturry which is within a 5 minute walk of Broad Oak (lies less than 300m from existing settlement boundary). The Rural Settlement Study also does not include this convenience store in the detailed assessment, a further illustration that it is not up to date.
- 7.2 Whilst the NPPF emphasises that importance of proportionate up to date evidence (paragraph 32), the failure to consider changes in service provision since 2023 is an illustration that the Plan is not justified.
- 7.3 A further illustration is the approach in the Rural Settlement Study to its concentration on facilities which are within the settlement rather than considering the potential accessibility to facilities elsewhere (especially in neighbouring towns or villages where they are within a reasonable walking distance). In this context, we refer to the National Travel Survey, particularly the research concerning the distance travelled for schools. The latest information³³ indicates (Table NTS0614a) that for primary aged children from 2002 through to 2024 (every record year), between 79% and 86% of all journeys of less than 1 mile were on foot. This provides a clear indication that this distance (1.8km) can be considered as the potential distance for the proximity of a primary school to a settlement, especially where there is a safe route including well-lit pavements.
- 7.4 For Broad Oak, residents can readily access the services in Sturry as there is a safe well-lit pavement along Herne Bay Road. Alongside the route to the shops and other facilities available at the Buddy's retail park referred to above, the Sturry Church of England Primary School lies around 1km from the south-eastern part of the village with the majority within the 1.8km distance referred to above. This is a further illustration of the evidence not being robust in discounting the availability of facilities near Broad Oak before determining its categorisation.
- 7.5 A further illustration of the inconsistency of approach in not fully recognise that locations adjoining settlements can be more sustainable than sites within is illustrated in appeal decisions, such as that for a proposal of 23 dwellings on land between School Road and Orchard Road, Hurst, Reading allowed on 11th October 2024³⁴. Paragraph 36 of the decision confirms:

³³ Table NTS0614 – Trips to and from school by age, trip length and main mode, aged 5 to 16: England, 2002 onwards
<https://assets.publishing.service.gov.uk/media/68a43995a66f515db69343e3/nts0614.ods>.

³⁴ Appeal for erection for 23 dwellings PINS ref APP/X0360/W/24/3342812 (Decision included as **Appendix 8**).

Moreover, I agree with the parties' shared view at the Hearing that the sustainability of a location was not defined by the site's position relative to Development Limits. This is because, potentially, sites outside of such limits could have equal if not better access to services than those within, especially in a settlement such as this with irregularly shaped Development Limits. This though conflicted, in part, with the Council's second reason for refusal, where the sustainability of the location appeared to hinge to a degree on its countryside location outside the settlement limits, rather than the development's direct relationship to whatever services were available.

- 7.6 Whilst it is recognised that this need to consider the specific locational characteristics of sites individually rather than the blanket assumption of accessibility implied in the Council's assessment is most relevant to the more sustainable towns and rural service centres, it does apply to locations like Broad Oak as illustrated by our clients site which is within walking distance of many facilities, and this is shorter than the equivalent for the western part of the village. This difference is not considered in the assessment given the draft Plan includes allocations in the western part of the village (policies R16-R18).
- 7.7 The suitability of Broad Oak for significant growth formed part of the strategic of the existing Local Plan (Site 2 in policy SP3) and can be reached within appropriate walking distance for the reasons explained. On this basis, Broad Oak should be included in the same tier of the settlement hierarchy as Sturry.
- 7.8 Furthermore, as detailed in the representations to policies R1 and R20, other authorities do not include specific limitations on the scale of development proposals within settlements. Notwithstanding our clients clear position that Broad Oak should be included in the same tier in the settlement hierarchy as Sturry, the other changes necessary to the policy are detailed below.

Changes sought to the Plan

- 7.9 Policy R13 is currently unsound for the following reasons:
- a) It is not **justified** as the approach does not reflect the evidence, especially regarding the higher level of access to facilities in Sturry from Broad Oak compared to other locations.
 - b) Not **consistent with national policy** as does not accord with the advice in NPPF paragraphs 83 and 110.
- 7.10 The changes to policy R13 therefore advocated are (additions shown in bold with deletions struck through).
- a) The Broad Oak should be included in the same tier as Sturry due to the availability of services as described.
 - b) The clause b in criterion 1 is amended to read:

~~The redevelopment of previously developed land, including at first floor level or above existing commercial or community premises, where this is of a scale and form appropriate to the size and character of the settlement.~~

- c) The clause c in criterion 1 is deleted.

8. Policy R20: Countryside

Context

- 8.1 The draft policy regarding acceptable types of development in the countryside is overly restrictive, especially as the text as draft would hinder the Council's ability to address housing land supply shortfalls. This is notwithstanding the flexibilities advocated in the revisions to draft policies SS7, R1 and R11. This is especially important given the need for such flexibility to enable appropriate options to be advanced and approved where housing land supply shortfalls arise.
- 8.2 Alongside the need for flexibility to address housing land supply shortfalls, the draft policy is inconsistent with the clear advice in NPPF paragraph 187 which is clear that there is a tiered approach to protection of areas, taking account of the respective value in a manner commensurate with their statutory status or identified quality in the development plan.
- 8.3 Whilst draft policy SS7 details the Council's commitment to a Local Plan Review, to provide greater flexibility to address deficits in five year supply, we advocate that an approach to that included in the adopted Ashford Local Plan and/or Fareham Local Plan is included in this policy. This allows for development adjoining settlements where these are proportionate in scale to the location and make an appropriate contribution towards addressing the land supply shortfall. As indicated in our response to draft policy SS3, land supply shortfalls are likely to arise given the overly optimistic assumptions of the Council.
- 8.4 In advocating revisions to the policy to incorporate an approach reflective of that in either Policy HOU5 of the Ashford Borough Local Plan 2030³⁵ or Policy HP4 of the Fareham Local Plan 2037³⁶ to enable early resolution of land supply shortfalls, we acknowledge that the Draft NPPF (policy S5) enables a comparable solution. However since the Council (consistent with its Local Development Scheme – March 2026) anticipates that submission of the Local Plan will occur in September 2026, this is before the 31st December 2026 date after which the guidance in the updated NPPF would apply, the approach in the Draft NPPF is not relevant, albeit recognising the clear expectation of the Government for Local Plans to be focused on allocations rather than development management types policies.

Suggested changes to make policy R20 sound

- 8.5 To policy as drafted is currently unsound for the following reasons:
- a) It is **not positively prepared** as it will hinder resolution of housing land supply shortfalls for the reasons explained.
 - b) Not **consistent with national policy** as it does not accord with the advice in NPPF paragraph 187.

³⁵ Extract included in **Appendix 2**

³⁶ Extract included in **Appendix 3**

8.6 The changes necessary to the Policy is therefore that:

- a) That the text of criterion 1 is amended to read (additions in bold and deletions shown struck through):

*Within the land countryside, which is any land outside of the Urban Areas, Rural Service Centres and Local Service Centres settlement boundaries (as defined on the policies map), all types of developments will ~~only~~ be supported where it protects **and enhances valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status)** and recognises the **intrinsic** ~~rural~~ character and **beauty** ~~appearance~~ of the countryside, and accords with other policies in this plan including:*

- b) That an additional criterion is added to the end of those in criterion 1 i.e. new criterion f. This would reflect that in policy HOU5 of the Ashford Local Plan and/or Policy HP4 of the Fareham Local Plan.

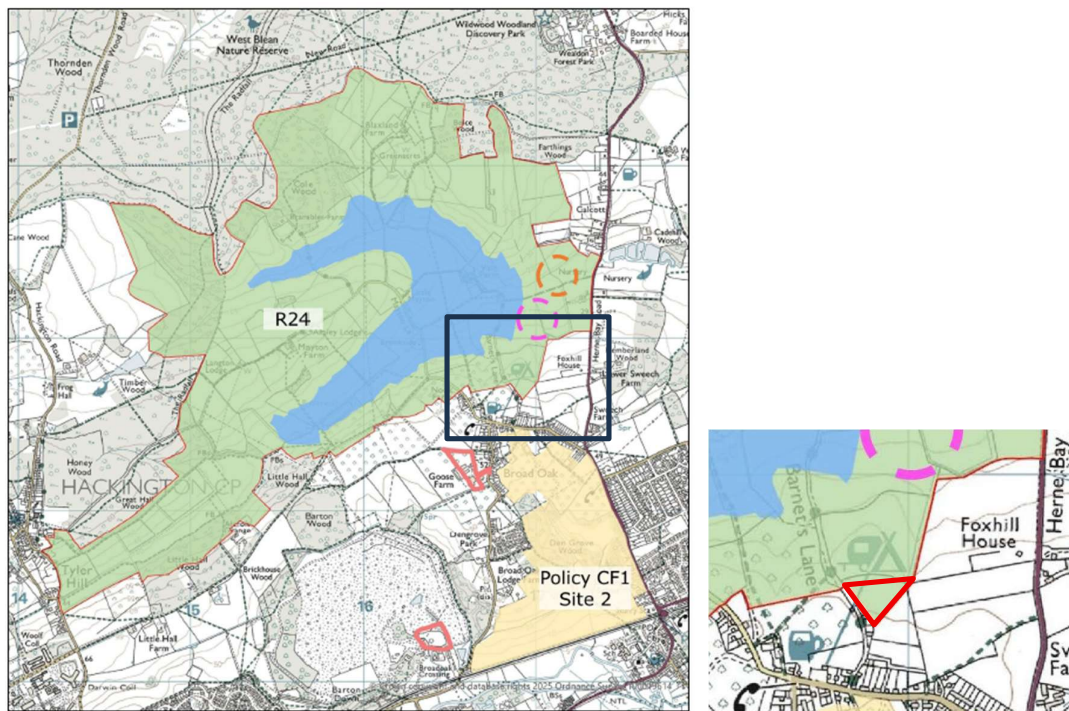
9. Policy R24: Broad Oak Reservoir and Country Park

Context

- 9.1 The consultation draft Local Plan includes a plan showing the extent of the proposed reservoir and associated country park. Whilst our clients do not object to the principle of the provision of the reservoir and/or its associated country park, the proposed land identified includes land which is within the land controlled by our clients. This is the triangle which is enclosed by the following grid references:

North-west: 616849 161737
North-east: 617008 161740
South: 616910 161658

- 9.2 The image below is an annotated version of the plan included on page 224 of the Draft Submission Local Plan which details the part of the wider indicative country park which is within the control of our clients.

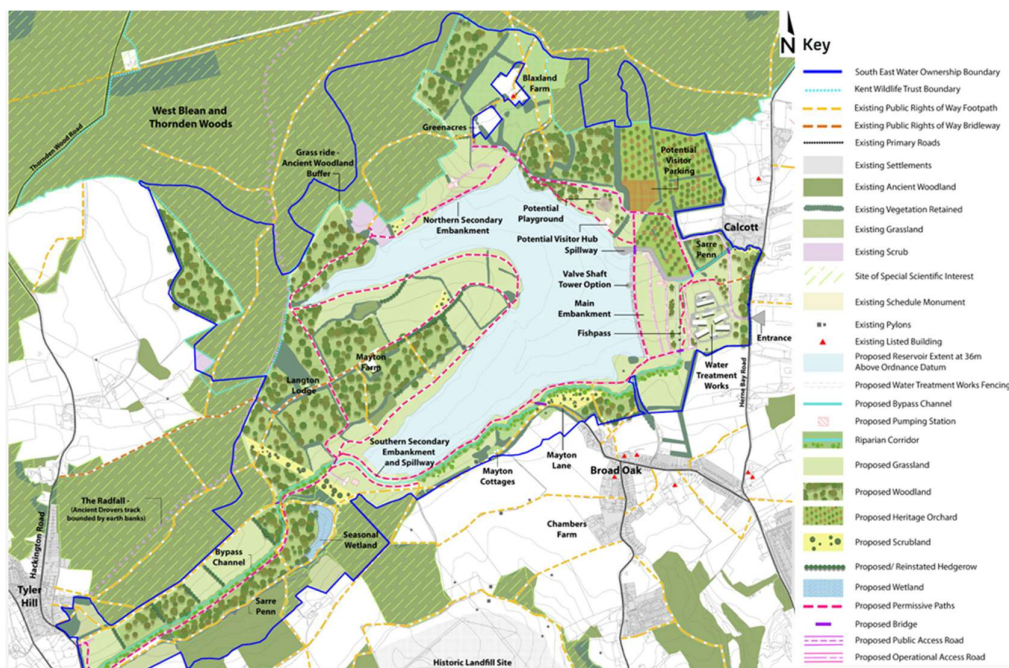


Copy of image from page 244 of Draft Submission Local Plan with annotated enlarged area (edged red) showing part which overlaps with clients land and therefore not deliverable for indicative country park

- 9.3 In drafting the representations to policy R24, our client has also had regard to the information released by South East Water which details their land interests. This was within their "public

engagement on our early proposals” which was available for comment from Wednesday 4th February to Wednesday 18th March 2026³⁷.

- 9.4 South East Water for the public engagement exercise released a draft masterplan for the reservoir and country park, which included information on the extent of their land interests. A copy of the masterplan is shown below.



Copy of masterplan for proposed Broad Oak reservoir prepared by South East Water (copy of image in Appendix 5)

- 9.5 The masterplan prepared by South East Water confirms that the triangle referenced above is not within their land interests. It also shows that there are other areas outside of their ownership such as Greenacres and Blaxland Farm. To ensure the wider project is deliverable, the land outside of the areas owned by South East Water should be omitted from the formal allocation.
- 9.6 To ensure a reasonable prospect that the wider reservoir and country park are deliverable, consistent with the programme of South East Water and that in the Infrastructure Delivery Plan associated with the draft Submission Local Plan, we would advocate that the extent of the wider allocation in policy R24 is refined so that it only includes the land within the direct control of South East Water.

Suggested Changes to Make Policy R24 Sound

- 9.7 The approach of draft Policy R24 is therefore unsound for the following reasons:

³⁷ As per <https://www.southeastwater.co.uk/about/our-plans/broad-oak-water/>. Copy of Masterplan from the website for the reservoir included as **Appendix 5**.

- a) It is not **justified** as the extent of the land identified is not based upon a proportionate evidence base; and
- b) It is not **effective** as the wider land shown for the country park is not deliverable.

9.8 The necessary change to the draft Submission Local Plan to address these soundness matters is that the extent of the indicative reservoir and country park does not extend beyond the land controlled by South East Water.

10. Omission Site: Land west of Herne Bay Road, Sturry/Broad Oak (LAA Ref: LAA315)

Introduction

10.1 Consistent with our objections upon Draft Policies SS2, SS3, SS7, R1, R11, R20 and R24, **our client's land west of Herne Bay Road, Sturry/Broad Oak should be included as a baseline allocation for approximately 130 dwellings.**

10.2 Site-specific information submitted in support of our representations³⁸ comprises as follows:

- (i) Site Location Plan No. 2054-PL-01 Rev A (**Appendix 9**)
- (ii) Illustrative Masterplan – 2504 PL02 Rev J (**Appendix 10**)
- (iii) Illustrative Constraints and Opportunities Plan No. 2054-PL 08 Rev J (**Appendix 11**)
- (iv) Design & Access Statement 2504 (**Appendix 12**)
- (v) Flood Risk Assessment & Outline Drainage Strategy (**Appendix 13**)
- (vi) Landscape and Visual Appraisal (EDP) (**Appendix 14**)
- (vii) Transport Assessment (SDP) (**Appendix 15**)
- (viii) Preliminary Ecological Appraisal (The Ecology Co-op) (**Appendix 16**)

10.3 As indicated in the representations to Policies SS2, SS3, SS7, R1, R13 and R20, there is a clear need for additional housing sites to ensure that the forthcoming strategy fully accords with national policy, particularly the need to provide for at least 15 years post adoption alongside the clear Government objective of significantly boosting the supply of housing. The representation on draft policy SS3 also indicates that the Council has advanced the stepped housing requirement for the reasons set out in paragraphs 2.26 to 2.28 of the Development Strategy Topic Paper. This state:

2.26 As set out in the Meeting Development Needs Topic Paper (March 2026) the draft Local Plan allocates sites to not only meet the housing need but also demonstrate a 10% margin over the plan period. Therefore, there is sufficient supply to meet the overall Local Plan needs in full over the full period of the Local Plan however the timing of delivery, as phased realistically based on developer engagement and the council's Phasing Methodology (2023), demonstrates that a stepped trajectory will be necessary to achieve a 5YHLS on adoption.

2.27 The council's Phasing Methodology (2023) clearly states that developments over 500 dwellings ('large' and 'super size' Sites) that do not have an application pending decisions, will not be able to have completions within the first 5 years. In addition, the first year of completions from 'medium' sites is expected to be 20 dwellings.

2.28 Based on the phasing assumptions in the Phasing Methodology (2023), SLAA (2026) and available planning application information, the council does not believe there is any additional supply of suitable, available

³⁸ Also submitted as part of the information for the pending application on the site - LPA ref CA/25/02361

sites that can be determined and granted within the timeframes to add significantly to the supply in the first five years of the plan period.

- 10.4 As detailed in the representation to policy SS3, the Council's approach discounts the clear evidence of the "Phasing Methodology" that any sites of up to 499 dwellings can from application submission deliver dwellings within 5 years, with a complete years' delivery during year 5³⁹. Based upon the build rates in the 'Phasing Methodology', 100 dwellings can be completed on such sites within the five years after the submission of an application.
- 10.5 The Council in preparing the draft plan has therefore discounted the potential of sites which can accommodate up to 499 dwellings as these can contribute towards the obligated boosting of supply in the short term.
- 10.6 Our clients site at Broad Oak is a clear illustration of this potential given it is the subject to a pending outline application for up to 127 dwellings which was validated on 23rd December 2025 (LPA ref CA/25/02361). Applying the implementation timeframe of the Phasing Methodology, the pending application site will start delivering in year 4 with 100 completions in the five year period from April 2025 to March 2030. The subsequent year would see the delivery of the remaining homes.

Land Availability Assessment (LAA)

- 10.7 Within the Council's LAA, our clients site west of Herne Bay Road, Broad Oak is assessed under reference SLAA315. In the latest version of the SLAA (2026), it is assessed as not technically suitable for development. The summary of the reasons for this conclusion are:

No - There is concern regarding the impact of the site on the character of the local area and the surrounding landscape. The site is located in an area with poor pedestrian access to public transport therefore future occupiers would be dependent upon private car to access day to day services.

- 10.8 The detailed assessment of the site, in considering what facilities are within a 15 minute walk states:

2 Key Services: Community Hall, Bus stop

0 Strategic Services: None

3 Additional Services: Place of Worship, Pub, Recreation Ground

- 10.9 With respect to Public rights of Way or cycle routes, it indicates:

A PRow cuts across the site from the south to the east boundary however there is poor pedestrian access to the site.

- 10.10 However, as the Transport Statement submitted with the pending application confirms, there are numerous facilities within walking distance of the site, including the convenience shops at Buddy's

³⁹ As per Table 4

retail park (off Herne Bay Road, Sturry) alongside Broad Oak Village Shop. Additionally, the eastern boundary of the site follows the rear of the pavement along Herne Bay Road and as important, to the bus stops on the frequent services towards Canterbury and Herne Bay (routes 600, 601 and 602)⁴⁰. The conclusions of the site with respect to poor sustainable access is therefore not justified, when considered in the context of the current position.

- 10.11 The SLAA also provides commentary of the landscape matters which also informed the Council position. This states:

Townscape: Residential dwellings about the southern boundary of the site, with Broad Oak village located to the south west. Development in this location would likely impact the character of the Local Service Centre with linear development to the north and south east.

Landscape: To the north, east and west of the site is open countryside and so it is anticipated that the proposal would have a negative impact to the landscape. The site located to the northern edge of the local service centre and the Sturry Cluster.

- 10.12 Again, the details landscape assessment with the pending application indicates that this position is not reflected in our own considerations.
- 10.13 This therefore indicates why the site can readily accommodate 130 dwellings, and given the pending application make a valuable early contribution towards addressing the housing land supply challenges in the district, alongside the wider objective of boosting its delivery.
- 10.14 Alongside the evidence confirming the suitability of the site and the achievability of residential development consistent with that as advanced in the pending application, in the context of wider accessibility matters, it is recognised that the Sturry link road is a transformative piece of infrastructure which will enable improvements in the ease of movement in Sturry and Broad Oak. As the "Highway Forward Works Programme 2024/25 and 2025/26" Report considered by the Canterbury Joint Transport Board on 24th March 2026 notes (Appendix D)⁴¹ that:

Construction remains on track to commence in spring 2026, with expected completion in early 2028. The first stage of archaeological investigations is now complete."

- 10.15 This is therefore a clear indication that the transformative benefits arising from the Sturry link road would be in place before the expected first completion on our clients land west of Herne Bay Road.
- 10.16 Whilst the Council has discounted the suitability of our clients site on the basis of accessibility, this has not prevented the inclusion of several allocations which are further from the key facilities. This is therefore a further illustration of the inconsistency in the assessment by the Council.

⁴⁰ Copies of timetables for these bus services included in **Appendix 7**

⁴¹ Copy of Joint Transport Board Report included as **Appendix 6**.

- 10.17 As detailed earlier in this representation, there is a very significant need for housing in Canterbury District.
- 10.18 The Government guidance on site assessments is clear that where insufficient sites have been identified, **"strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites"**.⁴²
- 10.19 Furthermore, the PPG also emphasises that **"Where constraints have been identified, the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the National Planning Policy Framework and the adopted or emerging development plan, which may affect the suitability of the site"**⁴³. As indicated in the representation, the Council must revise the settlement boundaries, including for Broad Oak and in doing so can readily identify further sites. This further review also needs to reconsider the reasons for the rejection of the land controlled by our clients at Broad Oak when the reasons for this have been shown to be unjustified.
- 10.20 Taking account of our representations, changes to Policy SS3 is necessary which include a revision of the overall target for homes together with the inclusion of our client's site as an allocation for 130 dwellings.

The Masterplan Proposals

- 10.21 The accompanying documentation (**Appendices 9 to 16** refer) demonstrates how the Site could accommodate approximately 130 energy-efficient dwellings (including 30% affordable) in a sensitive and appropriate manner. The form, quantum and disposition of development within the Site has been informed by the existing landscape, taking a sensitive approach to the settlement edge, which includes a landscaped buffer to the Site boundaries, including towards the proposed Broad Oak reservoir lying to the north of the site.
- 10.22 The Site's development will result in the privately owned site being transformed into publicly accessible green space, promoting healthy and active lifestyles in accordance with the approach set out at paragraphs 102 and 104 of the NPPF.
- 10.23 Additional open space is to be provided in the western parcel; ensuring the provision of significant areas of open space are proposed as part of this scheme.
- 10.24 Vehicular access is proposed from along Herne Bay Road on the eastern boundary with pedestrian access proposed to link into existing footways and cycle routes. Parts of the Site can be secured as publicly accessible open space and may also serve a biodiversity function as part of the scheme.

⁴² Housing and Economic Land Availability Assessment" section of the PPG under sub-heading "What happens if the assessment indicates that there are insufficient sites/ broad locations to meet needs?" (ID ref 3-025-20190722).

⁴³ "What happens when constraints are identified that impact on the suitability, availability and achievability?" sub-heading in the "Housing and Economic Land Availability Assessment" section of the PPG (ID ref 3-021-20190722).

10.25 The Illustrative Masterplan (**Appendix 10**) proposes the following land uses:

- Approximately 130 dwellings.
- A mix of market and affordable homes.
- Extensive open space with children's play area.
- Landscape buffers.
- Vehicular and pedestrian access from Herne Bay Road.

10.26 The new recreational open space will be accessible to all and will benefit from natural surveillance, creating an inviting and safe environment for people to enjoy.

10.27 The development of the Site will form an opportunity for environmental enhancement and the sustainable management of surface water runoff at source, through the provision of SuDS.

10.28 The Site is located wholly within flood risk zone 1 and whilst some parts of the site are at high risk of surface water flooding, no development is proposed in these areas. To ensure existing and future residents of Broad Oak are not prejudiced by future flood risk, albeit minimal, a bespoke SuDS strategy is to be incorporated into the scheme's design. Therefore, the principle of the proposed development is deemed acceptable on flood risk grounds and will provide a positive contribution to the sustainable management of surface water runoff.

10.29 The proposed drainage scheme will also ensure current surface water drainage issues associated with the existing unmanaged nature of the site will alleviate off-site flows to the betterment of existing surface water drainage conditions for neighbouring properties.

Technical Considerations

General

10.30 The Illustrative Masterplan proposals for the Site have been informed by a contextual analysis of many technical reports, socio-geographic considerations and opportunities including, but not limited to, highways and accessibility, heritage and landscaping.

Highways & Transport

10.31 The proposed access design has been arrived at following extensive assessment of the existing highway network.

10.32 As set out in the Transport Assessment (TA) (**Appendix 15**), the Site is well located to take advantage of the existing pedestrian network and public transport facilities in the vicinity of the site which will be enhanced through the extension of the public footpaths to the site itself.

10.33 The TA also confirms that the site is located within an accessible location, with a range of day-to-day services including educational, retail and convenience leisure facilities located within Sturry and Broad Oak. These are all within both an easy walking and cycle distance from the site as shown in Figures 2 & 3 of the TA.

- 10.34 Section 5 of the TA explains the access proposals, with a 6m wide vehicle access serving the Site from Herne Bay Road, along with a 2m wide pedestrian footpath on either side.
- 10.35 Pedestrian footpath enhancements on both sides of Herne Bay Road are to be provided in addition to additional north and southbound bus stops. This provides a wider community benefit in terms of ensuring opportunities to promote safe and suitable walking routes.
- 10.36 Section 7 of the TS assesses the impact of the scheme in highway terms and confirms the acceptability of the proposals in relation to existing capacity in the network.
- 10.37 Regarding vehicular movements, the TA demonstrates that the estimated quantum of future additional vehicular movements arising from the proposed development would not significantly change the operation of the local highway network.

Landscape

- 10.38 The receiving landscape has been assessed in regard to its capacity to accommodate change and the supporting LVA (**Appendix 14**) confirms the acceptability of developing the Site for housing having regard to the character of the surrounding area, and important views across the site.
- 10.39 The Scheme retains boundary planting, and significant additional vegetation is proposed as part of a comprehensive Landscaping Strategy which has been submitted for the pending application.
- 10.40 A cohesive green infrastructure framework can be provided, creating an attractive setting to the proposed development whilst still delivering this quantum of development (130 homes) Vegetation cover would be increased along retained field boundaries, ensuring that the proposed built development would be well integrated within the local landscape:

Ecology

- 10.41 Detailed surveys have been undertaken that have found the habitat value of the site to be of limited ecological interest, being dominated by pasture grassland.
- 10.42 Hedgerows and mature trees to the Site boundaries are of greater interest and will be largely retained and protected alongside development.
- 10.43 Native tree and shrub planting will be undertaken to reinforce the hedgerow boundaries, along with wildflower grassland creation and street tree planting.
- 10.44 As reiterated throughout the Ecological Impact Assessment (**Appendix 16**) identifies, the Illustrative Masterplan, which is supplemented by an illustrative landscaping strategy plan, demonstrates the potential to deliver some benefits for wildlife in the form of retained, enhanced and created habitats, with the opportunity to provide additional biodiversity enhancement measures alongside the new housing.

- 10.45 The Biodiversity Net Gain Assessment has determined that the proposed development will require off-site mitigation to achieve a 10% net gain in biodiversity. Such an approach is in accordance with the measures set out in the Environment Act 2021.
- 10.46 Measures have been proposed in respect of safeguarding fauna during construction, including badgers and nesting birds. Ecological enhancement measures have been proposed in respect of fauna, including the provision of integrated bird and bat boxes.
- 10.47 Based on successful implementation of the above, the development is not anticipated to result in any significant residual negative effects on important ecological features, with a net gain in biodiversity through onsite habitat creation without the need for off-site compensation. This would allow for the proposed scheme to accord with relevant nature conservation legislation.

Heritage

- 10.48 The Site is not located within the setting or part of a conservation area.
- 10.49 In addition, no heritage assets or locally listed structures are located within the Site.
- 10.50 The development of the Site for approximately 130 dwellings, will not result in a heritage impact that could outweigh the many public benefits of the scheme.

Drainage

- 10.51 The FRA (**Appendix 13**) confirms that the Site is located within Flood Zone 1. However, parts of the Site are subject to surface water flooding.
- 10.52 The proposed SuDS strategy includes permeable paving, swales, attenuation basins, raingardens and tree pits.
- 10.53 The outfall from the proposed attenuation will be discharged to the drainage ditches located along the northern boundary of the site.
- 10.54 Pollution mitigation components will meet and exceed the required level of pollution mitigation for removing total suspended solids, metals and hydrocarbons from the surface water runoff.
- 10.55 The FRA concludes that the principle of the proposed development is entirely acceptable with regard to flood risk grounds, and the scheme can make a positive contribution towards sustainable surface water management.

Summary

- 10.56 The allocation of land to the west of Herne Bay Road, Broad Oak for approximately 130 dwellings will assist in meeting the identified housing need, in a sustainable location, whilst securing sizeable public benefits, including a significant area of landscaped open space.

- 10.57 The Site offers an opportunity to create a new planned extension to Broad Oak that is well connected to the existing built-up area. The built form adjustments to Broad Oak arising from our clients scheme will mirror the changes which have arisen from the residential development south of the settlement off Fox Lane. The proposed reservoir (Draft Local Plan Policy R24) also provides the wider context for the site and how this establishes the limits of the settlement. As explained in the representation to policy R24, the extent of South East Water's ownership is known, and the reservoir will be delivered within those holdings. The reservoir will inform the longer term context and landscaping for the site.
- 10.58 The Site's proximity to services, facilities and employment opportunities in Broad Oak and Sturry demonstrates the sustainability merits of the Site for housing when set against the Council's on-going housing need.
- 10.59 Notwithstanding the location of the Site beyond the settlement policy boundary, the character of the Site is heavily influenced by the settlement of Broad Oak and the envisaged reservoir to its north which frame the overall site.
- 10.60 The Site is sustainably located and offers the opportunity to provide a material contribution to the District's pressing and on-going housing need and do so in an appropriate manner without impacting upon the wider countryside.
- 10.61 Development of the Site for housing can secure a range of benefits, including but not limited to:
- Provision of approximately 130 dwellings
 - Providing a mix of market and affordable homes (including 40% affordable)
 - Extensive open space with children's play area.
 - Landscape buffers.
 - Vehicular and pedestrian access from Herne Bay Road.

11. Summary and Conclusions

11.1 Our representations to the draft Local Plan have identified a number of objections to the document as drafted in respect of its soundness

11.2 **The amendments we think are necessary to make the Local Plan sound can be summarised as follows:**

- **The need to change the housing requirement to a consistent 1,215dpa throughout the Plan period thereby ensuring the emerging plan is consistent with the Government's planning advice and policy.**
- **Revisions to specific policies of the Local Plan to ensure better alignment of the strategy with the evidence base including the treatment of Broad Oak and Sturry in the settlement hierarch together with clarification of the measures to be actioned to address housing land supply shortfalls.**
- **Land west of Herne Bay Road, Broad Oak/Sturry (SLAA ref: LAA315) should be allocated as a baseline allocation for approximately 130 dwellings.**

11.3 These matters can be addressed through amendments prior to Council agreeing a Draft Submission Local Plan for a further set of consultation

11.4 We trust our representations are of assistance in preparing the next iteration of the Local Plan and await confirmation of receipt of our representations in due course.

11.5 We welcome the opportunity to engage with the Council to discuss our soundness concerns as well as the inclusion of the land west of Herne Bay Road, Broad Oak/ Sturry as a baseline application for approximately 130 dwellings in an updated version of the draft Local Plan. The inclusion of our client's site as package of additional housing allocations in equally sustainable locations across the Plan area will contribute towards meeting the housing requirement through to 2044.

11.6 Finally, we wish to be notified of each further step in the preparation of the Local Plan, including its submission to the Secretary of State, the publication of the Inspector's Report into the Examination of the Plan together with the adoption of the Local Plan.



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