



Monday 18th May 2026
665/A3/JJA

Planning Policy - Consultations Team
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By Email Only
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Dear Sirs

**Re Regulation 19 Draft Canterbury District Local Plan – March 2026
Representations on behalf of Catesby Strategic Land Ltd,**

I write with reference to the above. I act for Catesby Strategic Land Ltd, who have an interest in the land at Whitstable Road, Herne Bay, CT6 8BL (SHLAA site ref 073).

Having regard thereto, and further to our representations on the Regulation 18 Draft Canterbury District Local Plan (March 2024) and Draft Canterbury District Local Plan - Focused consultation (Reg 18) September 2025, we have reviewed the Regulation 19 Draft Canterbury District Local Plan – March 2026 and associated evidence base, especially the Sustainability Appraisal and associated appendices (March 2026), Duty to Cooperate Compliance Statement (February 2026) and associated SoCG with ABC, FHDC, DDC, SBC and TDC, Meeting Development Needs Topic Paper (March 2026), Development Strategy Topic Paper and associated appendices (March 2026), Strategic Land Availability Assessment (February 2026), Infrastructure Delivery Plan (March 2026), Viability Study Update (February 2026), Consultation Statement Topic Paper (March 2026) and Draft Housing Strategy 2026 to 2030 (2026); and as a result have the following comments on the Regulation 19 Draft Canterbury District Local Plan (March 2026), and associated evidence base.

1 The Housing Requirement

1.1 Local Housing Need and the Minimum Housing Requirement

1.1.1 As the Council has correctly identified in the Housing Needs Assessment Update (July 2025) and the Development Strategy Topic Paper (March 2026), the starting point for determining the Local Housing Need (“LHN”) is the Government’s Standard Method. The figure of 1,215 dpa reflects the Standard Method figure applicable at March 2026 and therefore accords with the advice set out in the PPG¹, albeit the latest affordability ratios issued after the plan was published would suggest a new figure of 1,179 dpa. For the purposes of consistency and ease of understanding these representations reflect and address the figure in the Reg 19 Plan, the difference being just 36 dpa in any event².

1.1.2 Before commenting on the housing land supply, it is important to note that the LHN figure is a minimum starting point, and it does not produce the Housing Requirement³.

¹ Housing and Economic Needs Assessment section of PPG - Paragraph: 008 Reference ID: 2a-008-20241212 Revision date: 12 12 2024

² Given recent completions we expect the 1,179 to increase to 1,199 when they figures are published later this month. As this is even closer to the 1,215 reference to 1,215 throughout is we believe appropriate

³ Housing and Economic Needs Assessment chapter of the PPG – Paragraph: 002 Reference ID: 2a-002-20241212 Revision date: 12 12 2024

1.1.3 The PPG⁴ goes on to advise that the housing requirement is the 'minimum number of homes that a plan seeks to provide during the plan period'; and that 'Once local housing need has been assessed ... authorities should then make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.' To this end the PPG advises that: 'The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.' My emphasis.

1.1.4 In the context of the above we note that the Reg 19 Plan is not looking to identify a housing requirement above that proposed by the standard methodology and does not appear to address the issues identified in the PPG as to why an uplift in the LHN figure may be appropriate. Rather, the Sustainability Appraisal (SA) Report (2025) at para 5.3.25 merely states: 'The PPG clearly identifies that the NPPF expects local authorities to follow the standard method to assess housing needs and that it is the minimum figure to inform the housing requirement in the local plan. There is currently no robust evidence to justify planning for an alternative higher figure as a plan requirement and include a 10% or 20% uplift to the mandatory standard method figure as proposed under the alternative options. The level of growth required under the standard methodology will help facilitate affordable housing, infrastructure and employment growth and provide a substantial uplift on recent housing completions in the district.' With para 5.3.26 continuing: 'Additionally, none of the alternative options were considered to perform any better in sustainability terms than the preferred option.' This does not in our opinion explain the rationale for not considering a higher requirement, especially in light of the findings of the Housing Needs Assessment Update of July 2025, and in the context of the unmet needs across the region, both of which we consider below.

a) Affordability

1.1.5 Whilst affordability is factored into the standard method, we note, when looking at the ONS 'House Price to Workplace-Based Earnings Ratio' released in March 2026, that the ratio of median house price to median gross annual workplace-based earnings by local authority district, England and Wales, 1997 to 2025 indicates that the ratio of median house price to median gross annual workplace-based earnings in Canterbury has increased over the past 10 years from 8.50 to 9.44⁵, the average for Kent being 9.73⁶, and the average for England being 7.63⁷. Whilst the above alone may not suggest a need for an increase in the LHN figure per se, the affordable housing need as evidenced by the Housing Needs Assessment Update of July 2025 indicates at para E12 that the latest 'analysis indicates an annual affordable housing need of approximately 695 units, with an 80% share (558 units) allocated to social and affordable rental housing and 20% (137 units) to affordable home ownership'; which equates to 57% of the total LHN⁸. On this basis, and as the Council are proposing an affordable housing policy requiring 30% onsite provision, which will only be triggered for those sites that meet the qualifying criteria, it is clear that the affordable housing need will not be

⁴ Housing and Economic Needs Assessment chapter of the PPG – Paragraph: 040 Reference ID: 2a-040-20241212
Revision date: 12 12 2024

⁵ ONS House price to workplace-based earnings ratio – March 2026 – table 5c
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

⁶ Table 3c

⁷ Table 1c

⁸ $695 / 1,215 \times 100 = 57.20\%$

met. Indeed table 7.6 of the Focused Regulation 18 Topic Paper made this very point, when it suggested an outstanding affordable housing requirement, after completions, commitments, and allocations, of 6,752 dwellings at the end of the plan period. We note no similar assessment has been undertaken for the Reg 19 Plan, albeit the overall housing target and components of the supply remain similar so the figure will not we believe be very different.

1.1.6 Given the decreasing trend in terms of affordability set out above, the gross affordable housing need of 695dpa is highly likely to increase over the plan period, leading to an increase in the net shortfall and in turn a higher number of people in need and on the Council's housing waiting list.

1.1.7 In the context of the above we note that whilst according to table 4.1 of the Authority Monitoring Report 2024-25 (AMR) (Dec 25)⁹ 531 affordable homes were completed in 2024/25, the average over the past 5 years is just 227 affordable homes. This is clearly well below the annual requirement set out in the Housing Needs Assessment Update of July 2025, and does in our opinion demonstrate the need for an uplift to the LHN figure to boost the supply of open market and affordable homes and thus help address the affordable housing needs of the district.

1.1.8 Reviewing the LHN in light of the above would also reflect one of the key strategic objectives of the Plan - to *'Provide affordable high-quality housing for people at every stage in their lives.'*

b) The Duty to Cooperate and Unmet Housing Needs

1.1.9 Whilst the Duty to Cooperate was repealed as a legal test in Schedule 7 of the Levelling Up and Regeneration Act 2023, it was replaced by a different mechanism to ensure cross boundary housing needs are taken into account in Local Plans. The new mechanism is a "soundness test" for Local Plans, which judges whether they are well-founded, justified, and effective. The first test of soundness, set out in NPPF paragraph 36, is whether plans are positively prepared, including being informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where practical to do so and consistent with sustainable development.

1.1.10 In the context of the above we note that whilst the Duty to Cooperate Compliance Statement (Feb 2026) suggests at para 4.9 that *'In line with the NPPF, the council has worked together with neighbouring LPAs at HMA level to consider housing provision strategically and has reached agreements that each LPA plans to meet its own housing needs within its own administrative boundary'*; this is not exactly true of the DtC Statements of Common Ground (SoCG) with Dover District Council, which suggests that as DDC had only recently adopted their Plan (Oct 2024), their OAHN of 611dpa remains the up-to-date housing requirement, and that the latest calculation of LHN (752dfpa) will be considered at the time of a future local plan review; or indeed the DtC SoCG with Folkestone & Hythe District Council which suggest that whilst F&HDC will seek to meet its housing need within its administrative area, the council is at an early stage in this process and cannot currently determine whether sufficient capacity will be found to meet its future housing need. Furthermore, we also note that the SoCG with the adjacent authorities, whilst dated March 2026 are not necessary an agreement of the relevant authorities' position on the matter of the housing requirement and housing land supply as at March 2026. For example, the SoCG with Ashford BC on pages 2 and 3 makes it clear that the position on the Housing Market Area and the position on

⁹ See web link: <https://docs.canterbury.gov.uk/files/adopted-local-plan-evidence-base/authority-monitoring-reports/2024-2025/Authority%20monitoring%20report%202024%20to%202025.pdf>

Meeting Housing Needs was agreed in March 2021, as was that with Dover DC. Likewise, the position on the Housing Market Area and the Meeting Housing Needs with Swale BC as agreed in May 2021, as was the position with Folkestone and Hythe, whilst that with Thanet DC was agreed in March 2024. All pre date the changes to the NPPF in December 2024 and the updated basis for assessing the LHN, which in the majority of these cases has increased, as set out in the table below.

Table 1.1

Region	LHN under the previous standard method	LHN under the new standard method	Difference
Canterbury	1,141	1,215	+74
Ashford	997	952	- 45
Dover	559	746	+187
Folkestone and Hythe	735	859	+124
Swale	1,040	1,048	+8

1.1.11 To blithely say that *'It is agreed that each party will meet its own housing needs'* is we consider slightly disingenuous given the change in circumstances. To put this into perspective the scale of the difference between the previous and new standard method figure equates to 349 dwellings across all five authorities, 274 when you discount Canterbury, which is circa 22.5% of CCC annual LHN of 1,215dpa.

1.1.12 Having regard to the above and having reviewed the Regulation 19 Plan and associated Topic Papers, and the SA, nowhere is the current level of unmet needs across the wider area quantified. Indeed, all documents are silent on this matter.

1.1.13 The SA does however assess 2 alternative options for growth, to the preferred option, the LHN of 1,215dpa (23,085 new dwellings over the period 2024/25 - 2042/43); one being a 10% increase in the LHN i.e. 1,337 dpa (25,394 dwellings over the LP period 2024/25 - 2042/43); and the other a 20% increase in the LHN i.e. 1,458 dpa (25,702 dwellings over the LP period 2024/25 - 2042/43). All three options have comparable scores against the SA objectives other than in terms of waste management, heritage, housing, land use, and health and sustainable communities. Whilst the greater impacts in terms of waste are attributed to the higher amounts of development being likely to be significant, the impacts with regards to health and sustainable communities are said to be uncertain, and the difference in terms of heritage and land use is not explained; the difference in terms of housing delivery itself is put down to there being *'greater uncertainty over the ability to deliver the housing, given the much lower rates of completed development than this experienced in the district in recent years'*¹⁰; which is we believe somewhat insincere when the lack of delivery has been down to the issues associated with delays in strategic infrastructure delivery, especially new road infrastructure, Covid and of nutrient neutrality, and how to address the latter, not a slowing down of the market or lack of demand/ interest in delivery from the housing building industry.

c) The Plan Period

1.1.14 Finally, we note that policy SS3 looks to deliver 23,085 dwellings over the plan period, 1st April 2024 to 31st March 2043 i.e. a plan period of 19yrs. We also note that appendix 1 of the 2026 LDS does not suggest receipt of the Inspector's Report followed by Adoption until November 2027 – December 2027. Any slippage would result in the plan period advocated in policy SS2 being less than 15 years from adoption. In order to comply with paragraph 22 of the NPPF and ensure a 15

¹⁰ See para 5.3.20 of the March 26 SA

year plan period from adoption, the plan period may need to be extended and additional housing allocations made to help address this additional requirement.

c) Conclusions on the Housing Requirement

1.1.15 Whilst recognising that the Council has worked from the correct starting point, which is the minimum annual LHN calculated by reference to the Standard Method i.e. 1,215 dpa when the Reg 19 Plan was published, the PPG is clear in that the LHN is only the starting point.

1.1.16 There are a range of factors relevant to the calculation of the housing requirement for the Draft Plan that the Council needs to consider when arriving at its overall housing requirement. These include:

- The inherent lack of affordability and the increasing affordability ratios; and
- The low levels of affordable housing delivery, and attendant increasing need for affordable homes.

1.1.17 When these factors are properly scrutinised, they demonstrate clear and rational reasons as to why there should be an uplift to the LHN. This is compounded by the issue of unmet housing needs within the wider region.

1.1.18 Having regard to the above Catesby believe that in order to ensure the Local Plan is soundly based, at the very least the plan should set a housing requirement 10% above the LHN. This would lead to an annual housing requirement of **1,337 dpa (25,394 dwellings over the plan period 2024/25 - 2042/43)** i.e. some 122dpa more than currently planned for (2,309 more dwellings over the plan period). Setting the housing requirement at this level would significantly improve the affordability situation within the District as it would help deliver more affordable homes for those members of the community in the most need. It would also help address the unmet housing needs of the wider housing market area. Whilst the plan appears, as set out in appendix 6 (The Housing Trajectory), to have a supply of 25,407 dwellings and thus should be able to deliver a 10% buffer, this is not what it currently plans for. Introducing a buffer into the housing requirement would ensure that the Council plans positively for the future, in accordance with national government guidance. In addition, the plan period will need to be kept under review to ensure it spans 15 years from adoption to comply with the NPPF, which could lead to the need to provide for an additional year's housing need.

2 Housing Land Supply and Trajectory

2.1 The Component Parts of the Housing Land Supply

2.1.1 Appendix 6 of the Regulation 19 Local Plan sets out the components of the councils housing land supply, which can be summarised thus:

Table 2.1

Components of supply	Dwelling numbers	Notes
Completions 24/25	1,232	
Extant planning permission	2,010	1,130 + 484 +396
Carried forward 2017 Local Plan allocations	10,392	
Draft New Allocations	9,344	8,964 + 380
Windfalls	2,429	
Total	25,407	

2.1.2 Whilst the Meeting Development Needs Topic Paper looks to explain/ justify the component parts of the supply, we believe that without a clear evidence base on deliverability of all the component parts of the housing land supply¹¹ 100% reliance on all current commitments (existing allocations and permissions) is not justified and a 10% buffer should be introduced to allow for non-delivery/ slower than expected delivery / provide a layer of much needed resilience¹². Likewise, whilst the proposed housing sites may deliver the quantum proposed within the plan period, this is subject to all of said sites being found acceptable by the Local Plan Inspector, such that a contingency may be sensible; and finally, the proposed windfall allowance is not based on a credible evidence base and is not justified. At 10.52% of the overall requirement¹³ and 12.24%¹⁴ of the residual requirement, it is a significant part of the overall supply and needs to be reviewed to ensure a realistic approach is adopted at Reg 19.

2.2 The 5 Year Housing Land Supply

2.2.1 We note that the Meeting Development Needs Topic Paper at para 2.189 suggests that based on the phasing information available a housing land supply of 5.82 years is forecast at the adoption of the draft Local Plan, which means an oversupply of 1,047 units. This is however predicated on the plan being adopted by 2027, the Inspector agreeing the proposed stepped trajectory, and a significant number of those sites deemed 'deliverable' within table 2.7 of the Meeting Development Needs Topic Paper actually delivering as predicted, which given some are subject to nutrient neutrality mitigation and thus have been subject to limited planning activity thus far, could be open to debate, especially sites C15 and C16.

a) The basis of and need for a Stepped Trajectory

2.2.2 Whilst we have already raised queries on the proposed adoption date, we would also question the rationale behind the stepped trajectory as this would appear to be predicated on ensuring the resilience of the rolling 5 yr housing land supply, which could, and should in our opinion be addressed through additional allocations rather than a stepped trajectory given our other concerns about the overall supply.

2.2.3 Planning Practice Guidance is clear about when a stepped housing requirement may be appropriate in plan-making, Paragraph: 012 Reference ID: 68-021-20190722 advising: '*A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy makers should ensure there is not continued delay in meeting identified development needs.*'

¹¹ At present only statements on the existing strategic allocations are provided

¹² To this end we note that the Development Strategy Topic Paper suggests at para E16 that '*only 83% of the overall housing supply in the draft Local Plan is considered viable with 93% viable or marginal*' which suggests that circa 7 is not viable and a further 10% is marginal – which in itself does not support a deliverable strategy.

¹³ $2,429/23,085 \times 100 = 10.52\%$

¹⁴ $23,085 - 1,232 - 2,010 = 19,843$

$2,429/ 19,843 \times 100 = 12.24\%$

2.2.4 In the context of the above we note the housing requirement has changed from an average of 800dpa in the Adopted Local Plan (2017)¹⁵ to 1,141 under the previous standard method, to 1,215 under the new standard method as at the time the Reg 19 Plan was published. The difference between the adopted local plan and the new standard method being 415dpa or circa 52%. Whilst we accept that a 52% increase between emerging and previous policies is a significant change in the level of housing requirement, the difference between the new standard methodology and the previous standard method is not, at 74 dwellings (1,215 – 1,141) (6.5%) significant¹⁶. Furthermore, it is clear when looking at section 2 of the Meeting Development Needs Topic Paper that the scale of the local housing need has been in excess of 1,100 dwellings since 2021. The LHN assessment of 2021 setting the figure at 1,120dpa. This then increased to 1,252dpa in the Reg 18 Plan of October 2022, before falling to 1,149dpa in the Reg 18 (2) Plan of 2024, and then increasing to 1,215 in the Focused review of September 2025 and the current Reg 19 consultation. The difference between the position in 2021 and 2025 being just 115 dwellings (1,215-1,100) i.e. just 9.45%¹⁷. This is not a significant change. Whilst we acknowledge that the council have as set out in the para 2.25 of the Development Strategy Topic Paper only managed to deliver in excess of 800 dwellings in 2017/18 and 2024/25, the lack of delivery in the intervening period has not been as a result of development industry apathy but because of delays in strategic infrastructure delivery, especially new road infrastructure, and the issue of nutrient neutrality, which has taken considerable longer to address than was ever envisaged. None of which has been helped by the issues surrounding Covid and the current state of the economy. In addition, it appears from the councils Housing Land Supply Statement 2024/25 that over the next 5 years housing delivery is estimated to be over 1,000 dpa. Whilst an increase is required to meet the LHN, this is not so significant in our opinion as to require a stepped requirement. The trajectory would suggest a strong market that can deliver early in the plan period. Additional allocations small and medium sized allocations would add to this and negate the need for a stepped trajectory.

2.2.5 In adopting the proposed stepped trajectory, the plan would look to deliver 1,215 dwellings in 2024/25 and then fall back to 972dpa for the period 2025/26 to 2031/32, before increasing to 1,360dpa for the period 2032/33 to 2041/42 and then falling back to 1,366dpa in 2042/43. This approach does not in our opinion suggest a step change in housing delivery, but rather a deliberate attempt to massage the trajectory to address the shortfall in the supply over the next 7 years and is indicative of the need for the council to look to adopt further small to medium site allocations to help address this deficit and ensure a 5 year supply upon adoption and rolling 5 year supply thereafter.

¹⁵ As set out in para 2.18 of the Development Strategy Topic Paper 'The adopted Local Plan (2017) has an annual housing need of 800 dwellings per year, but this was adopted as a stepped housing requirement of 500 dwellings per year (2011 – 2016) and 900 dwellings per year (2016 – 2031)'. We also note that the councils housing land supply has fallen woefully short of the current stepped supply for a number of years, as set out below, and that whilst this is in part due to the effects of delays in the delivery of strategic infrastructure, especially new road infrastructure, Covid and the issue of nutrient neutrality, and that in addition to the shortfall against the adopted Local Plan requirement, the council have also performed poorly against the LHN figure since its introduction, and as a result have failed the DTC for the past 5 years, currently being in presumption.

	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24-25	Total
Net additional dwellings Taken from LT122	1,020	311	417	319	692	644	660	1,235	5,298
	900	900	900	900	900	900	900	900	7,200
Shortfall / surplus	+120	-589	-417	-581	-92	-256	-240	+335	-1,902

The failure of the former stepped trajectory is why the existing strategic sites allocated in the 2017 Plan make up more of the housing supply/trajectory in the Reg 19 Plan than the newly allocated housing sites – see table 2.1 above. Thus, the council is still relying on 10 year old sites to help meet the housing supply for the next generation.

¹⁶ If the latest figure of 1,179 were adopted the difference would be even less at just 38 dwellings /3.3%

¹⁷ Again, if one were to adopt the latest figure of 1,179 dwellings the difference is just 79 dwellings /7.18%

To this end we note that the council suggest in para 2.26 of the Development Strategy Topic Paper that the timing of delivery is based upon developer engagement and the Phasing Methodology 2023. We have to say though that other than the Phasing Methodology 2023, and the SoCG on the existing Local Plan allocations, there are no SoCG within the evidence base to demonstrate any such discussions, and that as set out above allocating additional sites so as to negate the need for a stepped trajectory does not appear to have been properly considered as a reasonable alternatives in the SA or the Development Strategy Topic Paper.

2.2.6 In the context of the above, we note that whilst the Development Strategy Topic Paper interstates that the Phasing Methodology would suggest that small and medium sites would do little to add to the 5 year HLS – this is not actually what it says, and does not reflect what is suggested in Lichfield’s Start To Finish (3) (March 24).¹⁸

2.2.7 Start to Finish is quite clear that the average median planning approval period for small sites of less than 100 dwellings is 1.5 years¹⁹ and that the average period from receipt of planning to delivery for sites of 50 – 99 dwellings takes 2.3 years, i.e. a total average lead in time of 3.8 years. As said sites are on average delivering 20 dwellings a year²⁰ over 1.4 yrs five small sites would deliver circa 27 dwellings each i.e. circa 133dpa. Sites of 100 – 499 dwellings would Start to Finish suggests take on average 3.2 years from receipt of planning to delivery, which when coupled with an average median planning approval period of 2.8yrs, suggests no delivery within the 5 yr period. These are however averages and a willing authority could facilitate delivery within the 5 yr. period if it so chose. To this end we note that if the planning period were to be adjusted to 1.5 yrs to reflect that for sites under 100 dwellings in Start to Finish, which is not unreasonable given what is said in para 2.10 of the Phasing Methodology, the total time taken would be 4.7yrs, so with an average build out of 49 dpa, five sites of 100 – 499 dwellings would deliver circa 62 dwellings.

2.2.8 The 2023 Phasing Methodology on the other hand suggests slightly higher build out rates for sites of 10 – 99 and 100 – 499 dwellings, with somewhat ambiguous assumptions on lead in periods and what would realistically be delivered in the 5 yr period. For example, we assume table 4 of section 3 means that in reality sites of 100 – 499 dwellings that have been subject to a pre app and are about to submit would deliver within the 5 yr period and subject to the nature of the future application could deliver in yrs 3 – 5. But it is not clear. What is however clear from para 2.31 of the Phasing Methodology is that the phasing strategy relied upon for the past Local Plan was unrealistic, such that we would question how much confidence can be placed on the current phasing strategy.

2.2.9 Within the context of the above, to suggest as set out in the Development Strategy Topic Paper, that including further sites could lead to an oversaturation of the housing market in 2031/32 – 33/34 misses the point that additional sites in the Herne Bay area for example would help spread the distribution of development across the main settlements and address any such issues. Put simple more sites are needed to help address the current shortfall. More sites were put forward and dismissed through the SLAA process. That process should be revisited and sites such as that at Heymar, Whitstable Road, Herne Bay should be given further consideration in light of the housing land supply situation and the fact the council should be leaving no stone unturned to meet this and deliver a rolling 5 year housing land supply.

¹⁸ We note that the Phasing Methodology 2023 is based upon national studies that date back to 2014 and that the 2023 update reflects advice from just 8 parties and cannot be said to be representative of the whole industry.

¹⁹ See figure 3.1 of Start to Finish

²⁰ See table 4.2 of Start to Finish

b) The Scale of the Step in the Stepped Trajectory

2.2.10 Paras 2.38 – 2.42 of the Development Strategy Topic Paper look to justify the scale of the step proposed, suggesting that a housing requirement of 972 (80% of the LHN) for the first 7 years of the plan (from 2024/25 – 2031/32) with an uplift of 398 dpa (circa 41%) to 1,370 from 2032/33 – 2041/42, reducing to 1366 in 2042/43 is proportionate as it not only delivers a 5 yrs HLS but a surplus of 1,047 dwellings, which cannot be achieved at 90% (1094dpa) and would be doubled if the requirement were reduced to 70% (851dpa); again missing the point about the need for a step change in delivery. Whilst we do not believe a stepped trajectory is justified, and believe the fact the council appear to have factored in a 20% buffer throughout the plan period may actually be colouring their position on this matter, we would suggest on a without prejudice basis that if the council do not concur with our views as to the need to look to address the shortfall and just deliver on a level (Sedgefield) trajectory, then they should look to increase the first stepped requirement to 85% (1,033dpa) as even then, as set out below, they manage a 5 yr HLS with surplus. Table 2.2 would thus change as follows:

Table 2.2 - Stepped housing requirement

Year	Annualised housing requirement	No. of years	Total cumulative housing requirement
2024/25	1,215	1	1,215
2025/26 - 2031/32	1,033	7	7,231
2032/33 – 2041/42	1,370	10	13,700
2042/43	939	1	939
Total		19	23,085

2.2.11 Whilst, as set out above we do not support a stepped trajectory, the above at least provides for a greater degree of front loading than set out in the Reg 19 Plan, and as it still delivers a rolling 5 yr HLS should be given greater consideration.

2.2.12 In the context of the above, we note from table 2.8 and figs 2.2. and 2.3 of the Meeting Development Needs Topic Paper that the 5 year supply is, according to the councils' own calculations, going to outstrip the housing need year on year from 2027/28, so would question why a stepped trajectory is necessary, delivery rates in 2030/31 and 31/32 being well in excess of 1,500 dpa.

2.2.13 The above is in our opinion compounded by our concerns over the basis of the current 5 year housing land supply calculation, the overall supply, and the lack of any headroom in the housing land supply.

2.2.14 Whilst our concerns about the councils 5 year supply could in part be addressed by the introduction of additional evidence from site promoters with larger sites within the 5 year supply, this still assumes a stepped trajectory. If the trajectory is not stepped, as indicted below there would be a deficit upon adoption unless additional sites were introduced to help address this.

c) The substance of the trajectory

2.2.15 In the context of the above, we note that the deliverability/ developability assumptions set out in table 2.7 of the Meeting Development Needs Topic Paper do not provide a detailed trajectory for each site/ how many will be delivered within the 5 year period post adoption, just an indication of when the first year of completions is anticipated, many of which are not until 2031/32 which is the

end of the 5 year period post adoption. Furthermore table 2.7 of the Meeting Development Needs Topic Paper does not indicate which sites fall within the different component parts of the supply so there is no way of testing the assumptions made i.e. which local plan allocations are expected to contribute towards the dwellings to be delivered in 2027/28, 28/29, 29/30, 30/31 and 31/32, or which of the carried forward allocations are expected to contribute towards the dwellings to be delivered in 2027/28 etc, or indeed what planning permissions are contributing towards the dwellings to be delivered in 2027/28 etc. It is thus impossible to properly assess and comment upon the proposed trajectory.

d) The Various 5 Yr Housing Land Supply Scenarios

2.2.16 That said, taking table 2.9 of the Meeting Development Needs Topic Paper at face value when it comes to the components of the housing land supply, if one were to adopt a level Sedgefield method to calculating the 5 year supply rather than the stepped trajectory, it is clear, as set out below that rather than a housing surplus there would, using the 20% buffer as currently required be a significant deficit. We have in addition, given our comments above on the nature of the proposed stepped trajectory, included an additional column to demonstrate the effect of a 85% step.

Table 2.3

Components of Equation	CCC Dwelling Numbers	Catesby's position	Alternative stepped trajectory at 85% of LHN for first 7 yrs
Local Plan requirement 2024/25 - 42/43	23,085 (1,215 x 19)	23,085 (1,215 x 19)	23,085 (1,215 x 19)
2024/25 – 2026/27 requirement	3,159 (1,215 & 972 x 2 using stepped trajectory)	3,645 (1,215 x 3)	3,281 (1,215 & 1033 x 2 using stepped trajectory)
Completions from 01/04/24 to 31/03/25	1,232	1,232	1,232
Projected completions from 01/04/2025 to 31/03/2027	1,497	1,497	1,497
Shortfall	430 (3,159 – 1,232 – 1,497)	916 (3,645 – 1,232 – 1,497)	522 (3,281 – 1,232 – 1,497)
5 year requirement 1/4/2027-31/3/2032	4,860 (972 x 2)	6,075 (1,215 x 2)	5,165 (1033 x 5)
5 year requirement plus, shortfall	5,290 (4,860 + 430)	6,991 (6,075 + 916)	5,687 (5,165 + 522)
20% buffer	1,058 (5,290 x 20%)	1,398 (6,991 x 20%)	1,137 (5,687x20%)
Overall, 5 yr. requirement	6,348 (5,290 + 1,058)	8,389 (6,991+1,398)	6,824 (5,687 + 1137)
Annual requirement	1,270 (6,348/5)	1,677 (8,389/5)	1,365 (6,834/5)
Components of 5-year supply from 01/04/27 to 31/03/32			
Strategic and other new allocations	4,358		
New allocations in draft Local Plan	1,596		
Planning permissions	621		
Windfall allowance	559		

Components of Equation	CCC Dwelling Numbers	Catesby's position	Alternative stepped trajectory at 85% of LHN for first 7 yrs
Students	0		
Care homes	230		
New care home allocations in draft Local Plan	32		
Total 5 year supply	7,396	7,396	7,396
District-wide 5 year supply	5.82 (7,396/1,270)	4.41²¹ (7,396/1,677)	5.4 7,396/1,365
Surplus /Deficit	+1,046 (7,396 - 6,348)	-993 7,396 - 8,389	+572 (7,396 - 6,824)

d) Conclusions on the Housing Supply

2.2.17 The above clearly highlights the need to allocate additional smaller – medium sites i.e. sites of 20 – 200 dwellings, that can come forward with immediate effect to help address the housing land supply shortfall. It also suggests that the 'over supply' of 2,322²² dwellings across the plan period, as currently proposed should, at circa 10% of requirement, be the minimum the Plan should be looking to deliver to address our concerns about the commitments and windfalls. Anything less would mean the plan would be incapable of accommodating any fluctuations in the market/ improving the prospect of delivering the minimum housing need.

2.2.18 The above is in our opinion compounded by the issues surrounding Nutrient Neutrality and current moratorium on housing coming forward on sites within the River Stour catchment/ Stodmarsh lakes designated sites. Whilst we understand the council has started to promote a credit based approach to allow housebuilders to acquire credits to justify/mitigate new housing in these areas, we do not know whether this will work or what level of take up will happen. We also do not know how many credits are and will be available²³. The Council's only other accepted solution being for sites to have their own privately managed packaged treatment works which is both unrealistic and unreasonable on small to medium sized sites. As we said at Reg 18, there cannot be a one size fits all approach to addressing the issue of Nutrient Neutrality.

2.2.19 The net effect of the above is that Nutrient Neutrality has caused significant delays in housing delivery in the affected areas and there remains some uncertainties about universal mitigation. It is thus sensible to look to allocate sites which are not restricted by Nutrient Neutrality/ do not need to use up vital credits and can be delivered without delay. Land at Heymar can drain to Swalecliffe Waste Water Treatment Works which does not discharge into the Stour Valley and as such help deliver in the shorter term, thus helping to also address the 5 yr housing land supply situation highlighted above.

2.2.20 Having regard to sections one and two of this letter **policy SS3 is unsound and unjustified**

²¹ We note para 2.21 of the Development Strategy Topic Paper suggests a figure of 4.41 yrs using Sedgefield and 4.84 using Liverpool, both of which would fail the aims and objectives of the NPPF in terms of the 5 yr HLS, hence the push for a stepped trajectory. We also note that if a 5% rather than a 20% buffer were used (should housing delivery improve), and again using Sedgefield, the council would have 5.04 yrs supply (6991 + 5% (35) = 7341 – 7397 = 56 (5.04 yrs))

²² 25,407 - 23,085 = 2,322

²³ See <https://www.canterbury.gov.uk/planning-and-building/how-planning-applications-are-affected-stodmarsh-water-quality> and <https://www.ashford.gov.uk/news/latest-news/stour-environmental-credits-ltd-seeks-nutrient-neutrality-proposals/>

3 Policy SS7 and the issue of a Local Plan Review

3.2.1 Whilst we welcome the inclusion of a specific policy setting out when a review will take place, we do not consider this policy to be effective as it does not state that a review will be triggered should a neighbouring area be unable to meet its own housing needs. In such a circumstance it would be necessary for the Council to review its plan and whether additional sites could be allocated to ensure wider housing needs are met in full.

3.3.2 Given the above policy SS7 is unsound as it is not effective

4 The Spatial Strategy

4.4.1 In supporting the spatial strategy, with Canterbury Urban Area seen as the principal focus for development in the district, Whitstable and Herne Bay Urban Areas as the secondary focus, and proportionate development in the Rural Service Centres, we note when looking at the distribution of growth proposed in the Regulation 19 Draft Canterbury District Local Plan – March 2026 – see below - that the scale of development proposed at both Whitstable and Herne Bay is comparable to that proposed to come forward via windfalls. This does not in our opinion reflect the aspirations of the plan and we would suggest that given the scale of development put forward in Herne Bay that the council reviews its position and the merits of additional allocations in this area, such as that being promoted by Catesby on land at Heymar, Whitstable Road, Herne Bay. Additional development in this area could further the councils' aspirations for further infrastructure provision locally and provide for a more coordinated approach to infrastructure delivery than occurs through ad hoc windfalls.

Table 4.1

	Existing LP strategic allocations still to be built out	% of existing allocations	Proposed allocations	% of proposed allocations	Total	% of overall allocations	% of overall supply (25,407)
Canterbury	6,468	62.2%	5,987	64.07%	12,455	63.11%	49.02%
Whitstable	377	3.62%	1,890	20.22%	2,267	11.49%	8.92%
Herne Bay	2,685	25.8%	496	5.31%	3,181	16.12%	12.52%
Rural areas	862	8.29%	971	10.39%	1,833	9.28%	7.21%
Total allocations	10,392		9,344		19,736		
Completions 24/25					1,232		4.85%
Extant planning permissions					2,010		7.91%
Windfalls					2,429		9.56%
Total					25,407		
Requirement					23,085		
Surplus					2,322²⁴		

4.4.2 Within the context of the above we note that in considering whether the land at Heymar, Whitstable Road, Herne Bay was technically suitable for development the Feb 2026 SLAA concludes: *'No - there are concerns regarding landscape impact; and site is located in an area with*

²⁴ It is noted that those sites allocated in the adopted LP amount to some 563 dwellings and thus reduce the surplus to 1,782 i.e. 7.7%.

limited access to day to day services and public transport therefore future occupiers would be dependent upon private car to access day to day services.'

4.4.3 The above is surprising considering that the SLAA also says, in terms of facilities within a 15 minute cycling time:

"7 Key Services: Community Hall, GP's, Nursery, Primary School, Train station, Bus stop, Convenience store

5 Strategic Services: Existing employment area, Town centre, Hospital, Local centre, Secondary School

5 Additional Services: Dentist, Place of Worship, Post Office, Pub, Recreation Ground, Vet"

4.4.4 Likewise, the SLAA not only confirms that the site is not within the national landscape, but is not within, or adjacent to a Local Landscape Designation / Area of High Landscape Value. Whilst it is acknowledged that the site is within the Green Gap between Whitstable and Herne Bay, The landscape assessment undertaken by LDA Design and included within Catesby's call for sites submission in December 2024 carefully considers the contribution the site makes to the surrounding landscape character and the function it plays as part of the Green Gap between Herne Bay and Whitstable, and concludes that *'while the proposed development would reduce the extent and size of the Green Gap between Herne Bay and Whitstable, development can be accommodated within the Site without undermining the purpose and function of the gap.'* Indeed, it suggests that:

'Assuming the above recommendations are adhered to, the proposed development would:

- Not significantly affect the open character of the gap, adjoining the existing settlement area; retaining a large proportion of the Site as undeveloped, green infrastructure; and providing a more clearly defined settlement edge.*
- Not appear isolated or obtrusive within the countryside, adjoining the existing settlement area and integrated with new planting.*
- Not result in any physical coalescence, with proposed open space contributing to a clearly recognisable gap between Herne Bay and Whitstable.'*

4.4.4 The above is not referenced in the SLAA which continues to suggest that development on this site could contribute to the coalescence of these settlements.

4.4.5 The sites' location within the Green Gap should not in our opinion be treated as a reason for considering it to be unsuitable for development in whole or part, as the plan submitted as part of Catesby's call for sites submission in December 2024 clearly illustrated the potential design response and ability to maintain a green gap between Herne Bay and Whitstable. This is reproduced below for ease.



4.4.6 This form of development would in our opinion 'round off' the settlement edge, creating a new publicly accessible parkland on the edge of the urban area that would actively address one of the key objectives of the Local Plan Review i.e. to create a 'thriving environment' where *'Significant new areas of accessible, high quality open space will be created across the district and both new and existing valued open spaces enjoyed by the district's residents will be protected for future generations, ensuring continued access beyond the period of the plan.'*

4.4.7 In the context of the above we note that Policy HB4 - Land to the west of Thornden Wood Road (SLAA site 240) is located wholly within the Green Gap between Herne Bay and Whitstable and that its development would also conflict with the adopted 2017 Local Plan (Policy OS7), but was included as a draft allocation in the Reg 19 draft Local Plan for a new secondary school for Herne Bay and the coastal area, with supporting residential development. We also note that Policy HB6 - Hawthorn Corner (SLAA site 167) was, when it was assessed in the SLAA, considered technically unsuitable for development, but was nonetheless put forward as an employment allocation in the Reg 19 Plan.

4.4.8 Given the above we would ask that the Council review their position on the land at Heymar, Whitstable Road, Herne Bay, and look to allocate this site for the circa 175 dwellings and countryside open space promoted by Catesby.

5 Conclusions on the Regulation 19 Draft Canterbury District Local Plan – March 2026

5.1 Whilst we recognise the fact that in calculating their housing requirement the Council has worked to the correct starting point which is a minimum annual LHN calculated by reference to the standard method of 1,215 dpa when the plan was published for consultation, we are concerned that the scale of growth proposed in the Reg 19 Plan is the minimum needed to meet the LHN. No regard seems to have been had to increasing this to address the affordability issues that prevail in the area, the affordable housing needs of the area, and the issue of the unmet needs of the wider area. As set out above we believe that given these issues the plan should set a housing requirement 10% above the LHN.

5.2 Similarly, we are concerned about the lack of evidence underpinning the housing supply and the extent to which a 10% buffer needs to be provided so as to address any potential for delays in delivery/ non delivery of the proposed allocations. The deliverability of the existing commitments needs to be demonstrated more evidentially than it has to date. Likewise, the evidence needs to be provided to demonstrate that the proposed allocations will deliver the quantum of development suggested when expected; and the plan needs to encompass compelling evidence to support the windfall rates expected rather than rely on historic trends. To this end we do not believe the stepped trajectory is justified, and that rather than look to deliver less than the LHN over the foreseeable future the plan should look to allocate more small to medium sites so as to ensure a rolling five year housing land supply under the Sedgefield method.

5.3 Given the above **policy SS3 is unsound and unjustified**

5.4 Whilst we welcome the inclusion of a specific policy setting out when a review will take place, we do not consider this policy to be effective as it does not state that a review will be triggered should a neighbouring area be unable to meet its own housing needs. In such a circumstance it would be necessary for the Council to review its plan and whether additional sites could be allocated to ensure wider housing needs are met in full.

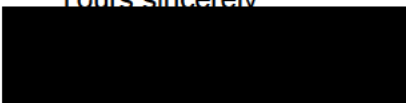
5.5 Given the above **policy SS7 is unsound as it is not effective**

5.6 Turning to the spatial strategy, whilst supporting this in principle, we do believe that additional sites could be delivered in Herne Bay to help address the issues we have raised with regard to the housing requirement and housing supply. To this end we remain of the view that the land at Heymar, Whitstable Road, Herne Bay should be allocated for the circa 175 dwellings and countryside open space. We believe that the development of this site can come forward in a timely way to help accommodate the housing needs of the area, and that it can deliver tangible benefits for the local community in terms of much needed family sized housing, affordable housing, and starter homes, as well as significant areas of high quality and accessible green space, new play facilities enhanced pedestrian and cycle links, and biodiversity net gains. It would also contribute towards the expansion of existing educational facilities, improvements to the strategic highway network, as well as local routes, and improvements to public transport provision.

Furthermore, not only can said development be accommodated without any adverse environmental impacts but provide an opportunity to provide for significant environmental improvements.

In the context of the above we would like to highlight Catesby's desire to work with Canterbury City Council on the delivery of this site, and to this end would welcome the opportunity to meet with officers to discuss our proposals for this site further, as well as our associated reps on the Reg 19 Plan/ its supporting evidence base.

Yours sincerely


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Judith Ashton Associates

C.c. Victoria Groves – Catesby Strategic Land Ltd