

Canterbury District Local Plan (2042/43)
(Regulation 19) Consultation
Representations on behalf of Parker Strategic
Land Ltd

May 2026

Turley

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Client

Parker Strategic Land

Our reference

PARS3003

May 2026

1. Introduction

- 1.1 These representations have been prepared to respond to the Canterbury District Local Plan consultation on behalf of our client Parker Strategic Land Ltd who are promoting land at Bodkin Farm, south of Thanet Way, Whitstable for development.
- 1.2 The land at Bodkin Farm has been promoted to earlier stages of consultation on the draft Local Plan and to the Council's 'call for sites' exercise. The site is identified using reference SLAA247 in the Council's Strategic Land Availability Assessment (SLAA) 2022.
- 1.3 In the current consultation draft of the Local Plan, the land at Bodkin Farm is identified as a mixed-use development site under Policy W7. We understand that this Site is proposed for allocation on the basis that doing so would facilitate the delivery of a new secondary school. Parker Strategic Land's position is that the Site is suitable for development, whether the allocation includes the secondary school or not.
- 1.4 These representations highlight that the Site remains available, deliverable and developable as highlighted in our previous representations. Since the land at Bodkin Farm is proposed for allocation, the focus of these representations is to address matters of deliverability. Parker Strategic Land reserves the opportunity to make specific comments on matters of soundness at a later stage, if it is necessary to do so.
- 1.5 One of the key points arising from these representations relates to the quantum of development to be delivered in accordance with Policy W7 and the Council's indications as to where new residential development would be acceptable within the Site. As these representations explain, Parker Strategic Land consider that the Council should seek to make efficient use of the land given that it is proposed to be allocated.
- 1.6 The Bodkin Farm Site is subject to an application for outline planning permission which has been submitted to the City Council in order to demonstrate the sustainability of the Site and support the emerging Local Plan evidence base. That application was considered at Committee on 28th April 2026 following Officers' recommendation that permission be granted. The Committee deferred making a decision pending receipt of additional information.
- 1.7 The application (CA/24/00224) proposes:

"Outline application with all matters reserved except access, including two vehicular access points from Thanet Way, for a mixed use development including secondary school (including sixth form) with indoor and outdoor sports provision, up to 300 dwellings, a care home, a Local Centre comprising up to 500m2 of retail space (Class E) and associated works including landscaping, drainage, engineering operations, pumping station, open space and play areas together with demolition of existing buildings."
- 1.8 The previous representations were supported by a range of other documents, however those have now been superseded by the material presented in this document. We have not provided each of the application documents, other than where it is considered necessary to address particular matters in the draft Local Plan.

2. Site Overview

- 2.1 This section provides context into the land at Bodkin Farm, Chestfield, Whitstable (hereafter referred to as 'the Site') which Parker Strategic Land is promoting for residential-led development. The entirety of the proposed allocation is owned freehold by Parker Strategic Land and its sister company Parkers of Leicester.

The Site

- 2.2 The Site is located to the south of the A2290 Thanet Way and is 3.7km east of Whitstable and 4.5km to the west of Herne Bay.
- 2.3 The Site is irregular in shape and extends to approximately 24 hectares in size. The Site is largely in agricultural use, with the exception of the former farm complex on the western side of the Site.
- 2.4 The former farm complex itself constitutes a farmhouse and several modern farm buildings. Bodkin Farmhouse was previously a Grade II Listed Building but was 'delisted' and is in a very poor condition. In addition, the property was subject to fire damage sustained in 2017. In the Applicant's view, the proposed development provides a clear opportunity to address the current state of this part of the site, which is frequently subject to occurrences of antisocial behaviour.
- 2.5 The northern boundary of the Site is formed by the A2290 Thanet Way, beyond which is Chestfield Business Park, Garden X (Johnsons Garden Centre and Pet Superstore) and scrub/agricultural land to the north.
- 2.6 To the east of the Site there is an area of Ancient Woodland (Purchas Wood) and the Molehill Solar Farm with fields in agricultural use beyond.
- 2.7 To the south of the Site are residential dwellings along northern side of Maydowns Road. The eastern half of the southern boundary borders fields in agricultural use. An existing Public Right of Way passes along the southern boundary of the Site. Footpath CW68 routes from the Shell Garage located to the east of the Chestfield Road / A2990 Thanet Way / Herne Bay Road roundabout to the rear of the properties fronting Maydowns Road. This footpath then joins Footpath CH8 which routes to Molehill Road to the south of the Site.
- 2.8 To the west of the Site, the land is within agricultural use, as well as residential areas, forming the Whitstable Urban Area.

Surrounding Area

- 2.9 The Site is located adjacent to the existing urban area of Whitstable. The character of the area is predominantly residential in nature, interspersed with a number of retail, commercial and industrial premises. A Sainsburys foodstore and B&Q stores are located to the west off Reeves Way.
- 2.10 The Site offers good access to a number of local services and amenities due to its location between Swalecliffe, Herne Bay, Chestfield, and the centre of Whitstable, all of which

offer a range of local services, making the site a highly sustainable location for development.

- 2.11 The A2990 Thanet Way benefits from continuous footway provision along the northern side of the carriageway, separated from the carriageway along much of its length by a wide grass verge. In part, the footway on the A2990 Thanet Way has been widened to 3m to provide a segregated footway / cycleway route.
- 2.12 The A2990 Thanet Way has limited formal pedestrian crossing facilities in close proximity to the site. Crossing facilities are primarily located at the Greenhill Road / Greenhill Bridge Road roundabout and the Chestfield Road / Herne Bay Road roundabout junctions to the east and west of the site respectively. At the Chestfield Road / Herne Bay Road roundabout, there are dropped kerbs and tactile paving to facilitate safe pedestrian movements between the southern and northern side of the A2990 Thanet Way carriageway. At the Greenhill Road / Greenhill Bridge Road roundabout, there is a toucan crossing on the A2990 Thanet Way arm of the junction to facilitate safe pedestrian and cyclist movements across the carriageway.
- 2.13 The nearest railway station is Chestfield & Swalecliffe located less than a mile from the site, offering transport links into London (Victoria & St Pancras) and Ramsgate.
- 2.14 Two bus routes operate in the vicinity of the site providing access to key destinations such as Canterbury, Whitstable, and Herne Bay. In addition, nine school bus routes operate in close proximity of the site providing access to local Canterbury Schools.
- 2.15 The closest bus stops to the site are the Maydowns Road bus stops located on both sides of the carriageway on Chestfield Road, approximately 900m west of the proposed primary site access, average frequency of one bus per hour facilitating travel to Canterbury, Chestfield, Whitstable and Seasalter. The number 914 / 915 / 916 / 917 school bus services also operate from this bus stop with one bus between 07:00-08:00 and one bus between 15:00-16:00.
- 2.16 Additional bus stops are located on both St John's Road and Herne Bay Road, approximately 1km west of the proposed primary site access, equating to a 14-minute walk. From these bus stops, the Triangle bus service operates with an average frequency of four buses per hour facilitating travel to Canterbury, Herne Bay and Whitstable. The number 903 / 904 / 905 / 906 and 922 school bus services also operate from these bus stops with one bus between 07:00-08:00 and one bus between 15:00-16:00.
- 2.17 Bus stops are also located on the B2205 Whitstable Road, to the northeast of the site. These bus stops can be accessed via Footpath CH13 which routes from the A2990 Thanet Way to the B2205 Whitstable Road, over a distance of approximately 300m. From the proposed pedestrian / cycle access point on the northeastern extent of the site, these bus stops can be accessed within a five-minute walk via Footpath CH13. The Triangle regular bus service and the 903 / 904 / 906 and 922 school bus services can be accessed from these stops.
- 2.18 For plan-making purposes, Chestfield is treated as part of the Whitstable Urban Area. Alongside Canterbury and Herne Bay, Whitstable is identified as an urban area under the current Local Plan. This recognises the sustainability of the settlement and its role in the District as a whole. Under the current Local Plan, the urban areas of the District were to continue to be the principal focus for development.

Planning Designations

- 2.19 As defined by the adopted Local Plan 2017 Policies Map, the Application Site is within the countryside and a Green Gap. The Local Plan 2017 did not allocate the Site for development.
- 2.20 The majority of the Site is within Flood Zone 1, the lowest category of flood risk. However, the western parts of the Site are identified as being located within Flood Zones 2 and 3 of the Government's flood risk map for planning.
- 2.21 The site is not located within a National Landscape (formally known as an Area of Outstanding Natural Beauty) or situated within Green Belt. There are no other landscape or ecological designations that would prohibit the development of this Site. The Site is located approximately 240m north of the Blean Woods Area of High Landscape Value.
- 2.22 There are no designated heritage assets within the Site. The Chestfield Conservation Area boundary is approximately 430m to the west of the Site, located to the south of Maydowns Road. A Grade II Listed Building (Colewood Farmhouse) is located to the northeast of the Site, between Thanet Way and the railway line.
- 2.23 There is one statutory designated site of national importance within 1km of the Site:
- Thanet Coast Site of Special Scientific Interest (SSSI) c. 0.72 km north of Site.
- 2.24 There are eleven statutory designated sites of international importance located within 10 km of the Site:
- Tankerton Slopes and Swalecliffe Special Area of Conservation (SAC) c. 0.72 km north of Site;
 - Thanet Coast and Sandwich Bay Special Protection Area (SPA) c. 0.72 km north of Site;
 - Thanet Coast and Sandwich Bay Ramsar site c. 0.72 km north of the Site;
 - Stodmarsh SAC, SPA and Ramsar site (i.e. 3 sites) – c. 7km south-east of the Site;
 - Outer Thames Estuary SPA - c. 1.3 km north of the Site;
 - Margate and Long Sands SAC - c. 6.2 km north-east of the Site;
 - The Swale SPA and Ramsar site (i.e. 2 sites) c. 3.4 km west of the Site; and
 - Blean Complex SAC – c. 3.7km south-east of the Site.
- 2.25 The Site is not located within a minerals safeguarding area.

Planning History

- 2.26 On 16th October 2015 a planning appeal¹ was dismissed for development on land including this Site for a mixed-use development of up to 290 dwellings, primary school, restaurant, office building, community building, gym/fitness centre, 24 unit care home, convenience shop, clubhouse/changing room building and 18.81ha of parks, amenity greenspace, children's play areas, playing fields, allotments and community woodland and associated access, infrastructure, landscaping and cycle/footways.
- 2.27 The appeal decision confirms that the main issue was *"The effect that the proposal would have upon the character and appearance of the area, having regard to its location within a designated Green Gap."*
- 2.28 The Inspector found that the provisions within the NPPF (as it was at the time) meant that the 'presumption in favour of sustainable development' did not apply.
- 2.29 The Inspector's decision was largely based on the effect of the proposed development on the Green Gap, within which the Site is located. The Council are now proposing to exclude the site from the Green Gap and are proposing its allocation for development.

The Current Planning Application

- 2.30 The description of the proposed development is as follows:
- "Outline application with all matters reserved except access, including two vehicular access points from Thanet Way, for a mixed use development including secondary school (including sixth form) with indoor and outdoor sports provision, up to 300 dwellings, a care home, a Local Centre comprising up to 500m² of retail space (Class E) and associated works including landscaping, drainage, engineering operations, pumping station, open space and play areas together with demolition of existing buildings."*
- 2.31 The proposed development comprises the following use classes and quanta:
- Up to 300 residential dwellings (Use Class C3).
 - An 80-bed Care Home (Use Class C2).
 - A secondary school (Use Class F1) including indoor and outdoor sports provision (Use Classes E and F2) across an area of approximately 8ha; and
 - A Local Centre, comprising up to 500m² gross internal area (GIA) of ground floor retail space (Use Class E) and up to 16 residential dwellings² (Use Class C3) on the first and second floors.

¹ APP/J2210/A/14/2227624 (LPA ref: CA/14/01319/OUT)

² This quantum of dwellings sits within the maximum 300 dwellings parameter defined for the proposed development as a whole.

3. Representations on Policy W7 – Bodkin Farm

3.1 Our client supports the identification of the Bodkin Farm site for residential-led development and allocation. However, our concerns arise from the quantum (and location within the site) of development proposed, and the detailed nature of the policy requirements.

3.2 Our client has progressed an application for:

“Outline application with all matters reserved except access, including two vehicular access points from Thanet Way, for a mixed use development including secondary school (including sixth form) with indoor and outdoor sports provision, up to 300 dwellings, a care home, a Local Centre comprising up to 500m² of retail space (Class E) and associated works including landscaping, drainage, engineering operations, pumping station, open space and play areas together with demolition of existing buildings.”

3.3 The proposed development comprises the following use classes and quanta:

- Up to 300 residential dwellings (Use Class C3).
- An 80-bed Care Home (Use Class C2).
- A secondary school (Use Class F1) including indoor and outdoor sports provision (Use Classes E and F2) across an area of approximately 8ha; and
- A Local Centre, comprising up to 500m² gross internal area (GIA) of ground floor retail space (Use Class E) and up to 16 residential dwellings³ (Use Class C3) on the first and second floors.

3.4 The application is submitted to support the principle of the proposed allocation of the site and demonstrate its deliverability at an early stage in the Plan period and for an increased quantum of dwellings. We consider the elements of the Policy in turn below with reference to the current planning application where appropriate.

1 Development Mix

a) Non-Residential

3.5 We support the proposed mix of non-residential uses proposed on the site and the current planning application is consistent with the approach proposed.

3.6 We understand that this Site is proposed for allocation on the basis that doing so would facilitate the delivery of a new secondary school. Parker Strategic Land’s position is that the Site is suitable for development, whether the allocation includes the secondary school or not. Notwithstanding this, the current planning application includes provision for a secondary school including sixth form provision as sought by the allocation.

³ This quantum of dwellings sits within the maximum 300 dwellings parameter defined for the proposed development as a whole.

- 3.7 The application is accompanied by a Secondary Education Report prepared by EFM (February 2024) which supports the need for a new secondary school. It notes that Kent County Council (KCC) is forecasting a significant rise in Secondary School pupil numbers in the coming years within the Canterbury area. By the end of the decade, the two Non-Selective Secondary Planning Areas in Canterbury are forecast to be almost 1,000 places over capacity. This will necessitate the need for new infrastructure provision.
- 3.8 Furthermore, the considerable quantum of housing development proposed for allocation in the emerging Local Plan to will further exacerbate an issue regarding Secondary School pupil place availability.
- 3.9 On the basis of the above, KCC requested a Secondary School on this allocation site large enough to accommodate 900 Secondary School pupils, plus Sixth Form provision. Our client has worked proactively with KCC to ensure a site large enough to accommodate this new provision is reserved within the development boundary.
- 3.10 Our client will continue to work with KCC to ensure that the serviced parcel is provided at a juncture that corresponds with the need for the new provision. KCC, as the delivery body, will be collecting funding from new developments in the area to bring forward this provision, and will manage the build programme to ensure that the provision is available of when it is required.
- 3.11 As per our comments on other elements of the Local Plan, it is important that all requirements are subject to viability appraisal to ensure they are deliverable.

b) Residential

- 3.12 The Policy refers to approximately 250 new dwellings. Parker Strategic Land consider that based on the assumptions in Policy W7, a greater quantum of development could be accommodated. This is demonstrated by the fact that Officers recommended the application for up to 300 dwellings, plus other supporting uses, be granted, and have not expressed concern regarding the quantum of development. Although the Committee deferred making a decision, this was not due to the quantum of development.
- 3.13 The Council should amend the Policy wording to refer to ‘approximately 300 new dwellings’ and update the concept masterplan.

c) Open Space

- 3.14 As per our earlier comments, given the need for the Plan to be read as a whole it is suggested this criteria should be deleted.

2. Design and Layout

- 3.15 We do not wish to comment on all elements of this section but note the following.
- 3.16 We note that the former Bodkin Farm complex of buildings is located in the western part of the proposed allocation and criterion 2e seeks these to be retained and redeveloped, where appropriate. This complex contains formerly Listed Buildings and is in a poor state of repair, having also sustained fire damage in 2017 and regularly being subject to antisocial behaviour. In our view the Local Plan and the allocation of the land at Bodkin Farm provides a positive opportunity to address the former farm complex through their demolition and comprehensive development of the site to make best use of this sustainable site and reflect the overall viability of the Plan requirements. As such we consider criterion 2e should be deleted.

3 Landscape and Green Infrastructure

- 3.17 Flexibility should be introduced to the various criteria to reflect that a balance will be required across the various requirements and that site specific circumstances may require deviation, such as access points potentially requiring removal of some elements of hedgerow.
- 3.18 Whilst we in principle support the provision of a landscape buffer to the east of the site, we differ from the Council in respect of its scale and compilation. Land to the east of the site, outside of the allocation, is to be comprised of a Green Gap which will in itself create a landscape buffer. A 15m buffer will also be provided to the Ancient Woodland outside but immediately adjacent to the site. This area will be protected from recreational disturbance and lighting via the 15m exclusion zone, within which access and external lighting sources will be prohibited. Measures will however allow for the free movement of wildlife in this area.
- 3.19 As shown on the application illustrative masterplan it is proposed that the school sports pitches will be located to the east of the school buildings and therefore form part of the landscape buffer. This zone will provide a gradual transition from the residential areas to the wider countryside. As part of the planning application process, our client understands that Kent County Council (the Education Authority) has been undertaking its own work to inform the design of the school, within the parcel identified by the plans for education use.
- 3.20 It is not considered a specific landscape buffer is necessary to the south of the site and note that the adjoining residential development to the west which extends further to the south than the allocation and does not itself have a landscape buffer.

5 Phasing and delivery

- 3.21 Part 5a of the Policy requires *“The secondary school site must be transferred to KCC at ‘nil consideration’ and fulfil KCC’s General Transfer Terms, on commencement of development.”* In our submission, whilst the Policy sets out a requirement for the school, it is inappropriate to set out the terms upon which the school site should be transferred to the County Council as the Local Plan policies should only be concerned with land use considerations. Parker Strategic Land will continue to liaise with the City Council and County Council regarding the deliverability of this proposal in general.
- 3.22 Part 5b of the Policy requires *“The local shopping and community facilities must be delivered prior to occupation of 50% of the total dwellings.”* In our view it is too early to establish such a requirement (if it is necessary in any event) as the nature of those shopping and community facilities is still to be considered. As a consequence, there is no suggestion that their provision is essential to the acceptability of the site and as such, the Policy requirement is unnecessary.

Compliance of the Planning Application Proposals with the emerging Local Plan Policy W7

3.23 The following table considers the relationship between this proposal and the requirements of the Policy.

Requirement	Response
<i>1. Development Mix</i>	
Across the site, the development mix will include:	The proposed development includes land in accordance with criterion a for a new secondary school and sixth form; and for new local shopping facilities. The scheme does not include for community facilities, but we note that the Policy encourages the dual use of the school facilities for community purposes.
a. Non-residential development:	The final part of criterion a is a matter for planning obligations.
i. Provision of a new 6FE secondary school, with 6th form (8.03ha site); ii. Provision of new local shopping and community facilities; and	We suggest that part a(iii) is removed. Part 1 of the Policy is concerned with the mix of development within the site. It is unnecessary and confusing for this Policy to define off-site infrastructure requirements.
iii. Proportionate contributions to community infrastructure in line with Policy DS15.	The proposal includes up to 300 dwellings and a care home of 80 beds.
b. Approximately 250 new dwellings including affordable housing, accessible housing and an appropriate housing mix in line with Policies DS1 and DS2.	The housing mix and other housing standards of the scheme are points which should be addressed through subsequent applications for reserved matters approval.
c. Open space provided in line with Policy DS28.	
<i>2. Design and Layout</i>	
The design and layout of the site should:	A comprehensive approach to masterplanning has been undertaken, having regard to the various considerations which inform the proposals.
a. Provide a high-quality built environment in line with Policy DS13 with an average net density of around 35 dph;	The proposed secondary school and its associated facilities are entirely located within the eastern part of the site, on an area of the Site which is not dissected by any PROW.
b. Locate the secondary school and associated facilities to the east of the site. The school should be located and designed to ensure it is not dissected by any PROW;	The Local Centre is proposed to be located to the west of the school.
c. Locate the local shopping and community facilities in the western part of the site adjacent to the secondary school. Consideration should be given for wider community use of the school sports facilities;	None of the proposed residential development is located within Flood Zones 2 or 3.
d. Locate residential development outside of Flood Zones 2 and 3; and	As per our comments in relation to the Policy, it is not considered appropriate to retain and redevelop the existing Bodkin Farm buildings given their state of repair and the implications this would have for scheme viability.
e. Retain and redevelop the existing Bodkin Farm buildings, where appropriate	

Requirement	Response
<i>3. Landscape and green infrastructure</i>	
The green and blue infrastructure strategy for the site should: a. Incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area C1: Chestfield Gap and Greenhill set out in Canterbury Landscape Character and Biodiversity Appraisal; and b. Provide a landscape buffer in the form of natural and semi natural open space to the east of the site including adjacent to the ancient woodland, and a landscape buffer along the southern boundary of the site, to provide visual separation between development, the surrounding countryside and existing development on Maydowns Road.	The application has been informed by and assessed against its location within the Local Character Area C1: Chestfield Gap and Greenhill. The proposals do not provide a specific landscape buffer along the southern part of the site adjacent to Maydowns Road, however the Parameter Plans indicate that bungalows are to be located in this area. The scheme has evolved in dialogue with local residents and now facilitates the creation of a perimeter block, encompassing the properties on Maydowns Road.
<i>4. Access and Transportation</i>	
The access and transport strategy for the site should: a. Provide safe and convenient pedestrian and cycle connectivity through the creation of new and improved routes including: i. Connections to Chestfield, Whitstable, Swalecliffe and Herne Bay, including toucan crossing on A2990 Thanet Way; ii. Connections to Chestfield & Swalecliffe railway station; and iii. Improvements to the PROW network crossing and around the site as required. b. Provide improvements to Chestfield and Swalecliffe railway station to include facilities for cycle parking and passenger flows; c. Provide primary vehicle access to the site from Thanet Way; and d. Provide a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars in line with Policy DS18.	The highways matters, including any off-site highways works, are discussed in the Transport Assessment produced by RPS, which confirms that all these criteria are satisfied by the proposals. Each element of the access and transportation aspects of the application have been accepted by Kent County Council Highways, Active Travel England and CCC's own Officers.
<i>Phasing and Delivery</i>	
(a) The secondary school site must be transferred to KCC at 'nil consideration' and fulfil KCC's General Transfer Terms, on commencement of development.	This is a matter concerning the transfer of land, rather than a planning consideration.

Requirement	Response
(b) The local shopping and community facilities must be delivered prior to occupation of 50% of the total dwellings.	The application includes for a local centre. The applicant is willing to discuss appropriate mechanisms for securing delivery of the local centre.

3.24 Our client would be keen to engage with the LPA to discuss how the policy wording could be revised to address our comments.

3.25 The draft Local Plan includes a Concept Plan which is intended to demonstrate one way in which the Site could be developed. In addition, the Applicant notes that the current planning application proposes a greater quantum of development than is envisaged in the draft Local Plan, namely through the inclusion of a parcel of development at the eastern end of Maydowns Road. No concerns have been expressed by the Officers regarding the disposition of development through that application.

4. Representations on other Matters

Policy SS1 – Environmental strategy for the district

- 4.1 Part 5 of this Policy requires development to provide a 20% net gain in biodiversity. We note that this is twice the level required (10%) by the Environment Act and does not reflect the circumstances where the mandatory requirement is not triggered. Whilst we note that Parker Strategic Land will seek opportunities to deliver BNG, this must also be considered in the context of the need to support the delivery of new homes and infrastructure, in this case new educational facilities. The provision of a new secondary school, including associated open space / sports pitches removes a large portion of this site which might otherwise be available for alternative purposes, including BNG measures.
- 4.2 The latest guidance published by the Government on 14th February 2024 advises that:
- “... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented”.*
- 4.3 It is clear therefore that the Government’s starting point is that Local Plans should not seek a higher requirement. At this stage it is not considered the Council have provided sufficient evidence to demonstrate the specific local circumstances to justify the enhanced requirement for Biodiversity Net Gain. We comment separately on viability considerations related to this as well.
- 4.4 Similarly, Part 6 of the Policy requires new developments of over 300 homes to incorporate a minimum of 20% tree cover across the site. Whilst clearly the provision of tree cover will also count towards the achievement of a net gain in biodiversity (although not proportionally to the same extent as other forms of biodiversity enhancements), this is a further requirement which will affect the delivery of an efficient use of land on sustainably located sites. The ability to deliver tree cover within the secondary school site on our client’s land is also likely to be more limited, further constraining the residential element of the allocation. The blanket requirement across the authority area is also likely to reduce the diversity of habitats proposed as part of new developments as woodland planting is likely to be prioritised to ensure both requirements are met. If the requirement is to be maintained, Parker Strategic Land are aware that in other local planning authorities policies allow for such measures to be provided ‘off-site’ and strongly consider that the same opportunities should be explored in this case.

Policy SS2 – Sustainable design strategy for the district

- 4.5 We note that the Policy states that: “New build residential development should be designed to achieve net zero carbon ready standards in line with Policy DS12 and Appendix 4: Sustainable design guidance.” We draw attention to our comments on Policy DS6 elsewhere in these representations.

Policy SS3 – Development Strategy for the District

- 4.6 The policy states an average requirement for 23,805 dwellings during the Plan period.
- 4.7 Appendix 6 of the draft Plan includes a housing trajectory which envisages a total supply of 25,407 dwellings. Whilst we have not interrogated that trajectory for the purposes of these representations, the Council should ensure that the supply is resilient and flexible to achieve the requirement.
- 4.8 In the consultation draft Local Plan, Whitstable is identified as an Urban Area in the highest tier of the proposed settlement hierarchy. Policy SS3 states that the Whitstable urban area (alongside the Herne Bay urban area) will be the secondary focus for development in the district. Our client supports the identification of Whitstable as an area suitable for development and support the reference to the allocation of the Strategic Development Area at South Whitstable.

Policy W3 – Whitstable Urban Area

- 4.9 Paragraph 3.6 of the supporting text highlights that there has been more limited investment in infrastructure and Whitstable is well placed to deliver growth during the Local Plan. Parker Strategic Land are supportive that the town forms an important aspect of the Council's approach to the distribution of growth.
- 4.10 Our client is supportive of the inclusion of Bodkin Farm to provide a new six form secondary school with sixth form at Bodkin Farm, however we note that the provision of residential development on the site will contribute to Whitstable's growth aims and is key to securing the delivery of the secondary school on the site. In our client's submission, the land at Bodkin Farm is a suitable location for development, whether it makes provision for a secondary school or not and provides a greater opportunity to accommodate sustainable development than the LPA currently envisages as discussed in Section Three above. Accordingly the reference in this Policy to 250 dwellings at Bodkin Farm should be amended to around 300.
- 4.11 We note the Policy refers to an indicative housing requirement for Chestfield of 19 dwellings. Given the proposed allocation at Bodkin Farm, we suggest that aspect of this Policy is removed to avoid confusion.

Policy W7 – Bodkin Farm

- 4.12 Our client supports the identification of the Bodkin Farm site for residential-led development and allocation. However, our concerns arise from the quantum (and location within the site) of development proposed, and the detailed nature of the policy requirements.
- 4.13 Our client has progressed an application for:
- 4.14 "Outline application with all matters reserved except access, including two vehicular access points from Thanet Way, for a mixed use development including secondary school (including sixth form) with indoor and outdoor sports provision, up to 300 dwellings, a care home, a Local Centre comprising up to 500m2 of retail space (Class E) and associated works including landscaping, drainage, engineering operations, pumping station, open space and play areas together with demolition of existing buildings."

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- 4.16 The application is submitted to support the principle of the proposed allocation of the site and demonstrate its deliverability at an early stage in the Plan period and for an increased quantum of dwellings. We consider the elements of the Policy in turn below with reference to the current planning application where appropriate.
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- 4.19 The application is accompanied by a Secondary Education Report prepared by EFM (February 2024) which supports the need for a new secondary school. It notes that Kent County Council (KCC) is forecasting a significant rise in Secondary School pupil numbers in the coming years within the Canterbury area. By the end of the decade, the two Non-Selective Secondary Planning Areas in Canterbury are forecast to be almost 1,000 places over capacity. This will necessitate the need for new infrastructure provision.
- 4.20 Furthermore, the considerable quantum of housing development proposed for allocation in the emerging Local Plan to will further exacerbate an issue regarding Secondary School pupil place availability.
- 4.21 On the basis of the above, KCC requested a Secondary School on this allocation site large enough to accommodate 900 Secondary School pupils, plus Sixth Form provision. Our client has worked proactively with KCC to ensure a site large enough to accommodate this new provision is reserved within the development boundary.
- 4.22 Our client will continue to work with KCC to ensure that the serviced parcel is provided at a juncture that corresponds with the need for the new provision. KCC, as the delivery body, will be collecting funding from new developments in the area to bring forward this provision, and will manage the build programme to ensure that the provision is available of when it is required.

⁴ This quantum of dwellings sits within the maximum 300 dwellings parameter defined for the proposed development as a whole.

- 4.23 As per our comments on other elements of the Local Plan, it is important that all requirements are subject to viability appraisal to ensure they are deliverable.
- 4.24 The Policy refers to approximately 250 new dwellings. Parker Strategic Land consider that based on the assumptions in Policy W7, a greater quantum of development could be accommodated. This is demonstrated by the fact that Officers recommended the application for up to 300 dwellings, plus other supporting uses, be granted, and have not expressed concern regarding the quantum of development. Although the Committee deferred making a decision, this was not due to the quantum of development.
- 4.25 The Council should amend the Policy wording to refer to 'approximately 300 new dwellings' and update the concept masterplan to reflect for consistency.
- 4.26 As per our earlier comments, given the need for the Plan to be read as a whole it is suggested the criteria relating to open space should be deleted. It is unnecessary for this Policy to require compliance with other policies.
- 4.27 We note that the former Bodkin Farm complex of buildings is located in the western part of the proposed allocation and criterion g seeks these to be retained and redeveloped, where appropriate. This complex contains formerly Listed Buildings and is in a poor state of repair, having also sustained fire damage in 2017 and regularly being subject to antisocial behaviour. In our view the Local Plan and the allocation of the land at Bodkin Farm provides a positive opportunity to address the former farm complex through their demolition and comprehensive development of the site to make best use of this sustainable site and reflect the overall viability of the Plan requirements. As such we consider criterion g should be deleted.
- 4.28 We note that the former Bodkin Farm complex of buildings is located in the western part of the proposed allocation and criterion 2e seeks these to be retained and redeveloped, where appropriate. This complex contains formerly Listed Buildings and is in a poor state of repair, having also sustained fire damage in 2017 and regularly being subject to antisocial behaviour. In our view the Local Plan and the allocation of the land at Bodkin Farm provides a positive opportunity to address the former farm complex through their demolition and comprehensive development of the site to make best use of this sustainable site and reflect the overall viability of the Plan requirements. As such we consider criterion 2e should be deleted.
- 4.29 3Flexibility should be introduced to the various criteria Landscape and Green Infrastructure to reflect a balance will be required across the various requirements and that site specific circumstances may require deviation, such as access points potentially requiring removal of some elements of hedgerow.
- 4.30 Whilst we in principle support the provision of a landscape buffer to the east of the site, we differ from the Council in respect of its scale and compilation. Land to the east of the site, outside of the allocation, is to be comprised of a Green Gap which will in itself create a landscape buffer. A 15m buffer will also be provided to the Ancient Woodland outside but immediately adjacent to the site. This area will be protected from recreational disturbance and lighting via the 15m exclusion zone, within which access and external lighting sources will be prohibited. Measures will however allow for the free movement of wildlife in this area.

- 4.31 As shown on the application illustrative masterplan it is proposed that the school sports pitches will be located to the east of the school buildings and therefore form part of the landscape buffer. This zone will provide a gradual transition from the residential areas to the wider countryside. As part of the planning application process, our client understands that Kent County Council (the Education Authority) has been undertaking its own work to inform the design of the school, within the parcel identified by the plans for education use.
- 4.32 It is not considered a specific landscape buffer is necessary to the south of the site and note that the adjoining residential development to the west which extends further to the south than the allocation and does not itself have a landscape buffer.
- 4.33 Part 5a of the Policy requires “The secondary school site must be transferred to KCC at ‘nil consideration’ and fulfil KCC’s General Transfer Terms, on commencement of development.” In our submission, whilst the Policy sets out a requirement for the school, it is inappropriate to set out the terms upon which the school site should be transferred to the County Council as the Local Plan policies should only be concerned with land use considerations. Parker Strategic Land will continue to liaise with the City Council and County Council regarding the deliverability of this proposal in general.
- 4.34 Part 5b of the Policy requires “The local shopping and community facilities must be delivered prior to occupation of 50% of the total dwellings.” In our view it is too early to establish such a requirement (if it is necessary in any event) as the nature of those shopping and community facilities is still to be considered. As a consequence, there is no suggestion that their provision is essential to the acceptability of the site and as such, the Policy requirement is unnecessary.
- 4.35 The following table considers the relationship between this proposal and the requirements of the Policy.

Requirement	Response
<i>2. Development Mix</i>	
Across the site, the development mix will include:	The proposed development includes land in accordance with criterion a for a new secondary school and sixth form; and for new local shopping facilities. The scheme does not include for community facilities, but we note that the Policy encourages the dual use of the school facilities for community purposes.
a. Non-residential development:	
i. Provision of a new 6FE secondary school, with 6th form (8.03ha site); ii. Provision of new local shopping and community facilities; and	The final part of criterion a is a matter for planning obligations.
iii. Proportionate contributions to community infrastructure in line with Policy DS15.	We suggest that part a(iii) is removed. Part 1 of the Policy is concerned with the mix of development within the site. It is unnecessary and confusing for this Policy to define off-site infrastructure requirements.
b. Approximately 250 new dwellings including affordable housing, accessible housing and an appropriate housing mix in line with Policies DS1 and DS2. c. Open space provided in line with Policy DS28.	this The proposal includes up to 300 dwellings and a care home of 80 beds.
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	The housing mix and other housing standards of the scheme are points which should be addressed through subsequent applications for reserved matters approval.
2. Design and Layout	
The design and layout of the site should: a. Provide a high-quality built environment in line with Policy DS13 with an average net density of around 35 dph; b. Locate the secondary school and associated facilities to the east of the site. The school should be located and designed to ensure it is not dissected by any PROW; c. Locate the local shopping and community facilities in the western part of the site adjacent to the secondary school. Consideration should be given for wider community use of the school sports facilities; d. Locate residential development outside of Flood Zones 2 and 3; and e. Retain and redevelop the existing Bodkin Farm buildings, where appropriate	A comprehensive approach to masterplanning has been undertaken, having regard to the various considerations which inform the proposals. The proposed secondary school and its associated facilities are entirely located within the eastern part of the site, on an area of the Site which is not dissected by any PROW. The Local Centre is proposed to be located to the west of the school. None of the proposed residential development is located within Flood Zones 2 or 3. As per our comments in relation to the Policy, it is not considered appropriate to retain and redevelop the existing Bodkin Farm buildings given their state of repair and the implications this would have for scheme viability.
3. Landscape and green infrastructure	
The green and blue infrastructure strategy for the site should: a. Incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area C1: Chestfield Gap and Greenhill set out in Canterbury Landscape Character and Biodiversity Appraisal; and b. Provide a landscape buffer in the form of natural and semi natural open space to the east of the site including adjacent to the ancient woodland, and a landscape buffer along the southern boundary of the site, to provide visual separation between development, the surrounding countryside and existing development on Maydowns Road.	The application has been informed by and assessed against its location within the Local Character Area C1: Chestfield Gap and Greenhill. The proposals do not provide a specific landscape buffer along the southern part of the site adjacent to Maydowns Road, however the Parameter Plans indicate that bungalows are to be located in this area. The scheme has evolved in dialogue with local residents and now facilitates the creation of a perimeter block, encompassing the properties on Maydowns Road.
4. Access and Transportation	

The access and transport strategy for the site should: a. Provide safe and convenient pedestrian and cycle connectivity through the creation of new and improved routes including: i. Connections to Chestfield, Whitstable, Swalecliffe and Herne Bay, including toucan crossing on A2990 Thanet Way; ii. Connections to Chestfield & Swalecliffe railway station; and iii. Improvements to the PROW network crossing and around the site as required. b. Provide improvements to Chestfield and Swalecliffe railway station to include facilities for cycle parking and passenger flows; c. Provide primary vehicle access to the site from Thanet Way; and d. Provide a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars in line with Policy DS18.	The highways matters, including any off-site highways works, are discussed in the Transport Assessment produced by RPS, which confirms that all these criteria are satisfied by the proposals. Each element of the access and transportation aspects of the application have been accepted by Kent County Council Highways, Active Travel England and CCC's own Officers.
<i>Phasing and Delivery</i>	
(a) The secondary school site must be transferred to KCC at 'nil consideration' and fulfil KCC's General Transfer Terms, on commencement of development.	This is a matter concerning the transfer of land, rather than a planning consideration.
(b) The local shopping and community facilities must be delivered prior to occupation of 50% of the total dwellings.	The application includes for a local centre. The applicant is willing to discuss appropriate mechanisms for securing delivery of the local centre.

- 4.36 Our client would be keen to engage with the LPA to discuss how the policy wording could be revised to address our comments.
- 4.37 The draft Local Plan includes a Concept Plan which is intended to demonstrate one way in which the Site could be developed. In addition, the Applicant notes that the current planning application proposes a greater quantum of development than is envisaged in the draft Local Plan, namely through the inclusion of a parcel of development at the eastern end of Maydowns Road. No concerns have been expressed by the Officers regarding the disposition of development through that application.

Policy DS1 – Affordable Housing

- 4.38 Our client has no specific objection to the level of affordable housing proposed as part of this policy however the reference to ‘at least’ should be removed to make clear what the requirement is and to allow it to be adequately tested through the viability appraisal. This would not of course prevent developments exceeding the level of affordable housing sought when brought forwards.

Policy DS2 – Housing Mix

- 4.39 We note that this Policy states “Developers will be expected to identify a Registered Provider to take on the affordable housing early in the process”. This matter is usually controlled through S106 Agreements and does not need to be set out in Policy.

Policy DS12 – Net zero carbon ready and water efficiency

- 4.40 Parker Strategic Land support the delivery of low carbon and energy efficient housing in principle. The nature of any requirements will need to be tested alongside the overall Local Plan requirements through a viability appraisal to ensure the proposed allocations are deliverable.

Policy DS13 – Sustainable Design

- 4.41 This Policy states “A design code will be required for proposals for more than 300 dwellings, or multiphased residential proposals.” This policy should be clarified as to when a design code is required for ‘multiphased residential proposals’. Whilst we have no issues with a Code being required for schemes of more than 300 dwellings, it is unclear why one would be necessary for a phased development of fewer dwellings.

Policy DS25 – Supporting Biodiversity Recovery

- 4.42 We do not seek to duplicate our comments in relation to Policy SS1 but this in itself highlights the duplication between policies as a result of their considerable length. We do note that in Policy DS21 our comment about the provisions as to when biodiversity net gain is required has been met.

Policy DS28 – Publicly accessible open space and sports

- 4.43 Our client supports and recognises the importance of publicly accessible open space and sports.

- 4.44 We do however note the proposed requirement that:

“Proposals for development for more than 300 homes will be required, for the total on site open space provision, to obtain the relevant designation (either Town / Village Green or Fields in Trust for the open space from the relevant body in line with the Council’s Open Space Strategy).”

- 4.45 It is considered that such an approach is inappropriate and indeed unworkable. Open space will be comprised of a variety of forms and scales and will not necessarily be appropriate for designation. Furthermore, it is unclear what benefit such a designation would bring given the open space will be clearly defined through the planning permission

and its future management and maintenance secured through a Section 106 Agreement. It is considered that this element of the Policy should therefore be deleted.

5. Summary

- 5.1 These representations have been prepared by Turley on behalf of Parker Strategic Land in support of residential development at Land at Bodkin Farm, Whitstable.
- 5.2 As set out in this report, our client is supportive of the proposed allocation of the Site for mixed-use development under Policy W7 of the Draft Local Plan. The Site is not subject to any constraints that would prevent development from being delivered and any site wide considerations can be overcome in order to deliver a viable mixed-use development on the Site.
- 5.3 We trust that the information provided within these representations will be considered by the Council. We would welcome the opportunity to meet with officers to discuss the Site further and would be grateful if you could confirm a suitable time and place to meet at your convenience.
- 5.4 In the meantime, please do not hesitate to contact us to discuss the Site or this submission further.

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