



Canterbury City Council Local Plan 2042/43

Regulation 19 Consultation

18 May 2026



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1 INTRODUCTION

1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Canterbury City Council Draft Local Plan consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman has provided positive feedback to all stages of the plan preparation process of the emerging Local Plan to 2042/43, having engaged with officers and submitted representations to the following consultations:

- Issues Survey Consultation - Autumn 2020
- Vision and Preferred Options Consultation – July 2021
- Draft Local Plan to 2045 Regulation 18 consultation January 2023
- Draft Local Plan to 2040 Regulation 18 consultation March 2024
- Focused Regulation 18 Consultation – October 2025

1.1.3 The sections that follow below include specific comments from Gladman on the Council's preferred options covering a range of the topics and questions that have been posed.

1.1.4 Gladman Developments have land interests in Canterbury which are being promoted through the emerging Local Plan. The sites are available, suitable, and deliverable for housing.

2 NATIONAL PLANNING GUIDANCE

2.1 National Planning Policy Framework

- 2.1.1 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.
- 2.1.2 The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered ‘sound’.
- 2.1.3 The NPPF reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for. The presumption in favour of sustainable development applies to plan making and plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.
- 2.1.4 In particular, paragraph 16 of the NPPF states that Plans should:
- “a) Be prepared with the objective of contributing to the achievement of sustainable development;*
 - b) Be prepared positively, in a way that is aspirational but deliverable;*
 - c) Be shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
 - d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
 - e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
 - f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”*

2.1.5 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3 DRAFT CANTERBURY DISTRICT LOCAL PLAN 2042/43

Housing Requirement

- 3.1.1 Gladman do not agree with Canterbury's decision to apply a stepped housing requirement.
- 3.1.2 The Council's justification for adopting a stepped housing requirement is set out within the Development Strategy Topic Paper. Paragraph 2.24 of the Topic Paper explains that the approach is considered justified because the increase in the housing requirement from 800 dpa in the adopted local plan to 1,215 dpa represents a significant uplift and therefore meets the criteria in paragraph 68-021 of Planning Practice Guidance (PPG). However, average annual housing delivery is expected to remain substantially above that lower figure. Delivery in 2024/25 reached 1,215 dwellings and over the next five years delivery is anticipated to exceed 1,000 dpa. It therefore appears that a principal reason for proposing a stepped trajectory is to enable the Council to demonstrate a five year housing land supply upon adoption. Where a five year land supply cannot be demonstrated, Gladman considers the appropriate response would be to address any shortfall through the allocation of additional sites rather than through the use of a stepped trajectory. The Council's evidence does not clearly demonstrate that further submitted sites were revisited for potential allocation prior to the decision to pursue a stepped trajectory.
- 3.1.3 Should a planning inspector conclude that the use of a stepped requirement is justified, it must nevertheless accord with paragraph 68-021 of the PPG and avoid unnecessarily delaying housing delivery into the later stages of the plan period. The trajectory should therefore remain sufficiently ambitious to support timely decision making and the prompt approval of development proposals. Gladman does not consider the proposed stepped approach achieves this objective.
- 3.1.4 Plan period
- 3.1.5 Gladman would respectfully recommend that the plan period is extended by a year to ensure that the plan period looks ahead for 15 years from adoption as required by paragraph 22 of the NPPF.

3.1.6 Whilst the latest Canterbury Local Development Scheme shows that the Council expects to submit the plan in September and that the inspectors report will be received at the end of 2027.

3.1.7 While plans can be adopted within the timeframe set out in the LDS they can often take longer and the Planning Inspectorate expect up to 140 Local Plans to be submitted over the next year. Gladman therefore recommend that in order for Canterbury to be certain of the plan looking forward for at least 15 years at least an additional year should be added to the plan period.

3.1.8 DS1 – Affordable housing

3.1.9 This policy is unsound as it has not been justified.

3.1.10 The policy proposes a variable affordable housing requirement, with 15% sought on wholly Previously Developed Land sites and 30% on all other sites. Whilst the principle of a variable rate is welcomed, Gladman is concerned that the Viability Assessment demonstrates in Tables 12.5a to 12.5c that the majority of brownfield typologies become unviable once the cumulative policy requirements of the local plan are applied. The tables also indicate that, outside Whitstable, many of the larger greenfield typologies are either marginal or unviable due to the overall policy burden within the plan. Whilst Gladman acknowledges that much of the development proposed will come forward on strategic sites considered viable by the Council, there remains concern that the remainder of the development required to deliver the plan will struggle to support the proposed affordable housing requirements.

Policy SS1 - Environmental Strategy for the district

3.1.11 This policy is unsound as it has not been justified.

3.1.12 The requirement for a minimum of 20% biodiversity net gain is inconsistent with the Environment Act 2021, which establishes a statutory requirement of 10% BNG. Any policy requirement exceeding 10% must be clearly evidenced and supported by analysis of the implications for development viability. A requirement for 20% BNG has the potential to significantly affect viability and therefore should be fully tested through the whole plan viability assessment.

- 3.1.13 Gladman is concerned that several costs within the viability evidence appear to have been underestimated. In particular, the assumed cost of delivering 20% BNG is considered unrealistically low, with Table 8.8 setting out costs across different site typologies that do not generally reflect the costs currently experienced by the development industry. Gladman accepts that BNG delivery costs will vary considerably depending on the habitats present on a site. Whilst costs may be relatively modest in some circumstances, in many cases they are likely to be substantially higher than those assumed within the Viability Study.
- 3.1.14 This is largely because many housebuilders are now required to secure BNG off-site in order to maintain a sufficient developable area to ensure viability. This issue is compounded by the fact that the cost of off-site provision is considerably greater than the assumptions used in the Government's 2019 Impact Assessment, upon which the Viability Study relies. Furthermore, the additional 10% BNG requirement proposed by the Council is even more likely to be delivered off-site, further increasing costs to developers.
- 3.1.15 The Viability Study must also account for rising taxes and levies. Gladman notes that the Building Safety Levy has been included within the assessment, however the proposed increases to Landfill Tax rates do not appear to have been considered. These changes are expected to significantly increase development costs.
- 3.1.16 Taken together, these additional financial burdens will create a more challenging viability context for development within Canterbury. Based on the current findings of the Viability Study, and having regard to the additional costs identified above, Gladman considers it necessary for the Council to reduce the cumulative policy burden placed upon development. This is required to ensure that, consistent with paragraph 59 of the NPPF, decision makers can assume that development complying with the local plan policies will remain viable and, as required by paragraph 35 of the Framework, that policy requirements do not undermine the deliverability of the plan. This may necessitate a reduction in the affordable housing requirement and/or amendments to other policies, including removal of the 20% BNG requirement in DS25.

DS12 – Net Zero Carbon Ready and water efficiency

- 3.1.17 This policy is unsound as it has not been justified and is inconsistent with national policy.

- 3.1.18** Part 2 of the policy states that all new residential development must achieve net zero carbon ready standards in accordance with Appendix 4. The policy then sets out how those standards should be achieved. Gladman considers this approach unsound. By requiring residential development to be net zero carbon ready, the Council is effectively duplicating the requirements of the Future Homes Standard, which the Government has confirmed will come into force on 24 March 2027 and which will already ensure that new homes are net zero carbon ready. The inclusion of this policy is therefore unnecessary and risks creating confusion for applicants and decision makers regarding the applicable requirements. In addition, the policy conflicts with draft policy PM13 within the recently consulted upon draft NPPF. As set out earlier in these representations, although limited weight can currently be attached to the draft NPPF consultation, careful consideration will need to be given to the final published version. Gladman therefore considers it necessary for Part 2 and Appendix 4 to be deleted. Consequential amendments will also be required elsewhere in the plan where references are made to Appendix 4.
- 3.1.19** Part 4 of the policy requires all major development proposals to undertake whole life cycle carbon assessments. Gladman considers this requirement unjustified, as there is currently no support within the NPPF for policies requiring whole life carbon assessments. Such assessments are onerous and can produce highly inconsistent outcomes depending on the materials used within a scheme. Not all construction products are supported by Environmental Product Declarations (EPDs), making it difficult to undertake consistent assessments across developments and creating uncertainty as to how decision makers should interpret the results. Gladman therefore considers this element of the policy should also be deleted.

DS25 – Supporting Biodiversity Recovery

- 3.1.20** This policy is unsound as it has not been justified and is inconsistent with national policy.
- 3.1.21** Part 2g requires developments of 300 homes or more to provide a minimum of 20% tree cover. The justification for this requirement is set out in paragraph 9.12 of the Natural Environment Topic Paper, which explains that the policy seeks to maintain Canterbury's existing tree canopy cover of 19.5%. However, this does not provide sufficient justification for requiring developments of 300 homes or more to deliver a minimum 20% tree cover.

- 3.1.22 The proposed threshold also fails to account for the BNG requirements and whether the delivery of BNG on-site is compatible with such a level of tree canopy cover. Habitats requiring replacement are not always compatible with extensive tree planting. In such circumstances, requiring significant on-site tree cover could either reduce the developable area or increase the extent of BNG required off-site. Equally, the policy takes no account of the interaction between tree planting and other infrastructure requirements. Where trees cannot reasonably be accommodated in close proximity to infrastructure, compliance with the policy may prove difficult without reducing the developable area of the site.
- 3.1.23 Rather than imposing a fixed percentage requirement for tree cover, Gladman would suggest a more flexible policy approach that seeks replacement planting for trees lost and ensures trees form an important component of site design. Such an approach would allow tree planting to be integrated in a manner appropriate to the specific characteristics of each site.
- 3.1.24 Policy 3b requires major development to deliver a 20% biodiversity net gain. The Council will need to have regard to the draft NPPF, which states in paragraph N1 that development plans should only require BNG standards above the statutory 10% minimum in relation to specific allocations. If retained, Part 3b of DS25 would therefore be inconsistent with national policy and likely attract very limited weight once adopted. In these circumstances, Gladman considers the only appropriate course of action is the deletion of the 20% BNG requirement.
- 3.1.25 Gladman does not consider the 20% requirement justified. In assessing the soundness of this policy, regard must be had to paragraph 74-006-20240214 of the PPG which states:
- 3.1.26 “... 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”.
- 3.1.27 As stated earlier, Gladman considers that the Viability Study substantially underestimates the costs associated with delivering BNG. There is therefore a significant risk that the 20% requirement could render certain sites unviable. Given the Council’s stated objective of delivering additional affordable housing, it does not appear appropriate to place delivery of

such housing at risk in order to secure biodiversity gains above those already legally required.

- 3.1.28** By delivering a statutory 10% biodiversity net gain, development already ensures a positive contribution towards biodiversity enhancement. Requiring a further 10% uplift cannot reasonably be considered necessary to make development acceptable in planning terms or fairly related to the impacts of that development.

4 POLICY C15 – LAND SOUTH OF LITTLEBOURNE ROAD

- 4.1.1 Gladman strongly support Policy C15: Land south of Littlebourne Road and welcome the inclusion of the sites allocation for housing. The site as part of the East Canterbury Strategic Development Area offers a unique opportunity to develop a high quality, sustainable residential led development that would make a critical contribution to meeting housing needs in the District. Located on the eastern edge of Canterbury, the site presents a unique opportunity to deliver a well-connected and sustainable new neighbourhood comprising new homes alongside education provision, employment space, local centres, and community facilities.
- 4.1.2 Gladman are confident that land South of Littlebourne Road could come forward as a standalone site and has the sustainability credentials to do so. However, East Canterbury provides an important opportunity to deliver a new sustainable community and supporting infrastructure well located to Canterbury and as such Gladman recognise and support the need for a co-ordinated approach with proposals for neighbouring site C16.
- 4.1.3 Gladman supports the policy wording that up to 1,700 dwellings can be delivered on site C15. Gladman recognise that with a co-ordinated approach will be required with site C16. Gladman would be keen to see additional policy guidance from Canterbury on expected densities within East Canterbury as higher densities will likely be required around the community hubs and the spine road. Should the Council consider that a joint masterplan session with planning policy team and the East Canterbury land promoters would be useful in order to consider in the round the design implications of the current policy wording then Gladman are more than willing to participate.
- 4.1.4 Gladman recognise the benefits a new multi-modal bridge connecting East Canterbury to Mountfield Park will bring not just to East Canterbury but also in alleviating congestion within the City Centre. However Gladman would caution that the trigger point for delivery of the bridge needs be aligned with progress on the scheme to the south at Mountfield Park where the bridge lands in order for the full or indeed any benefits to be achieved at the point of delivery. Mountfield Park has the benefit of an outline permission of up to 4,000 dwellings with 140 units having the benefit of full permission and due consideration should be given to the phasing plans and progression of reserved matters applications in the timing of delivery of the bridge.

4.1.5 The Draft Canterbury District Transport Strategy at page 18 states:

The sites present the opportunity for a vehicle connection between the A257 and A2 at Bridge. In addition to providing access to development sites, the link will help alleviate congestion on the city centre ring road, which will benefit new and existing bus routes.

4.1.6 With this recognition of the wider benefits the delivery of the bridge will offer it raises the question whether the potential benefits of the bridge constitute a plan wide benefit and therefore whether other sites should also be making proportionate contributions to the cost.

4.1.7 Table 8.3 of the Infrastructure Delivery Plan March 2026 (IDP) identifies an indicative cost of £5 million to deliver the bridge. This is based on a feasibility study that has in all likelihood been rendered out of date by price rises caused by world events over recent times.

4.1.8 The IDP also states that the bridge should be delivered 'Prior to the occupation of 1,000 dwellings across sites C15 and C16 (medium term)' Gladman consider that the evidence shows that more dwellings can be delivered prior to the bridge being required especially when the need to align with the phasing of Mountfield Park is taken into account.

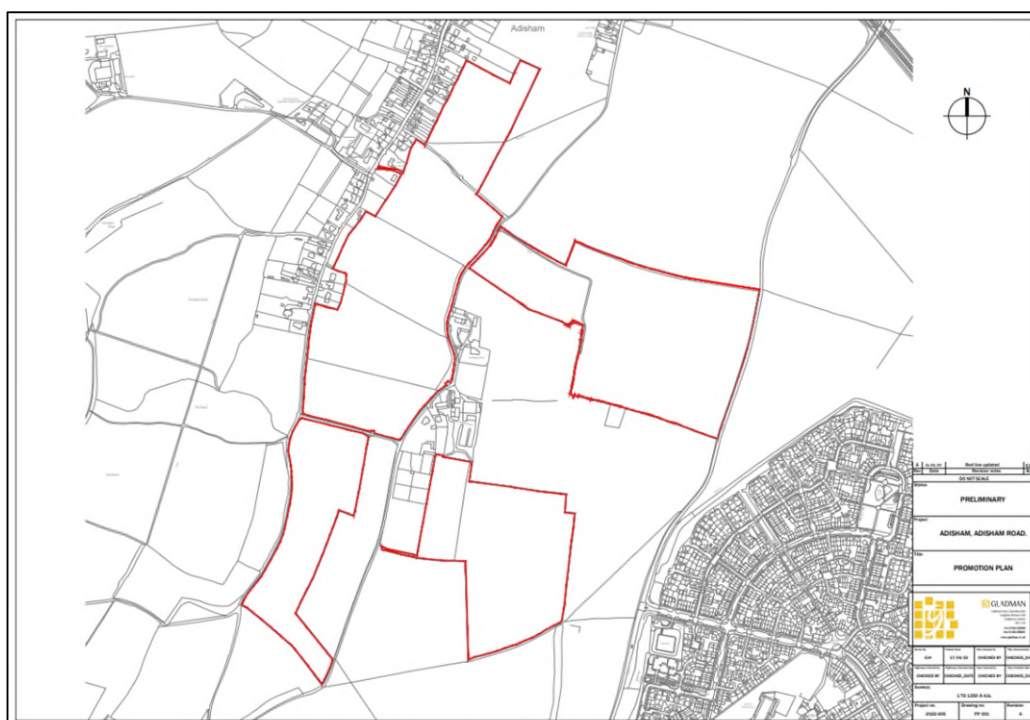
4.1.9 Gladman strongly support the IDP identifying that KCC should be the lead delivery partner in delivering the bridge given its strategic nature.

4.1.10 Gladman support the inclusion of a Park and Ride facility on site C15. As part of the wider East Canterbury Strategic Development Area transport strategy, there is a clear opportunity to introduce a new Park & Ride facility along the A257 corridor. This will assist in intercepting car trips on the eastern approach to Canterbury and support the city's goals of reducing congestion and promoting sustainable travel choices. This aligns with the aspirations of the Draft Canterbury District Transport Strategy to see expanding Park & Ride facilities and integrating them with local bus and active travel networks.

5 LAND OFF ADISHAM ROAD, ADISHAM

- 5.1.1 Gladman are promoting land off Adisham Road, Adisham for residential development. The 43.75 hectare site, shown edged red on Figure 5 below, offers an ideal opportunity to develop a sustainable, high quality, self- sustaining garden community that could make an important contribution to meeting housing needs in the District.

Figure 1: Site Location Plan- Cooting Farm



- 5.1.2 The 43.75 ha site currently comprises fields in agricultural use to the south east of Adisham. The site is located within the Cooting Farm Garden Community which was draft allocated in the October 2022 Regulation 18 plan. The site provides an important opportunity to deliver a new sustainable community and supporting infrastructure.
- 5.1.3 The site was previously identified as a broad location for the development of a new garden community during the period of the Local Plan. Former Policy R1 allocated the site for approximately 3,200 dwellings, plus two new community hub, two 2FE primary school, and open space.
- 5.1.4 Gladman are committed to working proactively and collaboratively with adjacent landowners in the future to bring this site forward in accordance with garden city principals.

- 5.1.5 The location of the Cooting Farm Garden Community has the benefit of existing sustainable travel options that can be expanded to serve the quantum of development. The site benefits from close proximity to Adisham Station located on the northern boundary of the site and Aylsham Station located 1.5 miles from the site.
- 5.1.6 On 16 December 2025, the government opened a consultation on the National Planning Policy Framework (NPPF), which contained a range of proposed reforms to the planning system. Under policies S5 and GB7, one of these reforms involved establishing in principle support for suitable proposals that develop land around rail stations within existing settlements, and around well-connected train stations outside settlements that are located within the top 60 Travel to Work Areas. The policy requires that the land must be within a reasonable walking distance of the station. Given the close proximity of Cooting Farm, Adisham to Adisham Train Station Gladman consider this site meets the criteria of the policy and would therefore be of interest in the medium to longer term as an area of search for future residential sites.
- 5.1.7 Adisham has several bus stops through the village which offers two school services. Additional services are available from Aylesham with the No.89 offering the most frequent service. In support of these representations.

Gladman contend that the Cooting Farm Garden Community remains a logical broad location for a future Rural Garden Community.

6 CONCLUSIONS

6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the Regulation 19 Local Plan. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2024) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 6.1.3 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at policy@gladman.co.uk.

