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Representations to the Draft Canterbury Local Plan 2042/43

Milton Manor, Milton Manor Road,
Chartham, CT4 7PH

Iceni Projects Limited on behalf of
CCH Build Solutions Ltd

May 2026

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ON BEHALF OF CCH BUILD
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Draft

Representations to the
Canterbury Local Plan 2042/43
MILTON MANOR, MILTON MANOR ROAD,

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1. INTRODUCTION

- 1.1 This representation has been prepared by Iceni Projects on behalf of CCH Build Solutions Ltd (CCH) in response to the consultation on the Draft Canterbury Local Plan 2042/43 Regulation 19. CCH are promoting land at Milton Manor House, CT4 7PH, southeast of the Milton Manor Roundabout of the A28, which comprises an area of land of approximately 7.92 ha (the Site).
- 1.2 Representations were previously made by CCH on the Regulation 18 Draft Local Plan 2045 (2022). In the intervening period an outline application has been submitted on the Site for 95 dwellings (CA/23/01766). The application was submitted in September 2023 and is currently being held in abeyance due to Stodmarsh Nutrient Neutrality.
- 1.3 CCH are delighted that the Site remains allocated under Policy C14 (Milton Manor House) of the Draft Local Plan and generally support the policy direction and intentions of the Plan and the proposed allocation. However, whilst they agree that a suitable scheme can come forward on the Site, CCH still wish to raise some concerns regarding some part of the allocation and policy direction.
- The 20% Biodiversity Net Gain (BNG) requirement.
 - The location of the primary access to the Site.
- 1.4 The Milton Manor House Site represents an opportunity for new residential dwellings in the area, to assist in meeting the District's housing needs which has been severely disrupted by Nutrient Neutrality issues, and is capable of delivering approximately 95 homes in a sustainable location.
- 1.5 While it is noted that this is now the submission version of the Local Plan, CCH hopes that these comments are provided to the Inspector and can be addressed through the EiP, in order to strengthen the allocation to support the delivery of a sufficient quantum of housing and assist in meeting the Council's housing targets.

2. BIODIVERSITY NET GAIN ('BNG')

- 2.1 Following initial investigations into the Site and the viability of the scheme, CCH continues to raise concern in respect to the requirement for Milton Manor to achieve a 20% Biodiversity Net Gain, in line with Policy SS1/DS25 of the Draft Local Plan. CCH consider that this is not a sound approach and should be amended to reflect the national requirement of 10%. The policy is not considered to be justified as per Paragraph 36b.
- 2.2 Whilst CCH supports the Council's aspirations in seeking environmental improvements across the District, it is felt that doubling the national target of 10% is not justified by the Plan's evidence base. Whilst the achievement of 20% Net Gain would be feasible on some sites, the cost and viability of delivering BNG inevitably depends upon its existing ecological baseline. In the case of Milton Manor, the Site accommodates Ancient Woodland, which sets a high baseline from which to achieve a 20% Biodiversity Gain. Initial investigations into the feasibility suggests that offsite mitigation would be required to achieve this. CCH also has concerns that some of the costs in the viability study around the cost of BNG units has been underestimated.
- 2.3 While CCH recognises the new flexibility that has been introduced into Policy DS25 through the additional '10% local net gain' and amended approach to how these are considered (i.e. Criterion 3 of Policy DS25), in addition to the statutory 10%, CCH still have concerns that the overall approach is not sound.
- 2.4 The national BNG target of 10%, set by the National Government, is wholly sufficient to achieve the objectives set out within Paragraph 187(d) of the NPPF and the Goals of the Environment Act. As set out within NPPF, the new Local Plan must balance a number of objectives broadly relating to the three pillars of sustainability, and it is considered that placing a requirement on Developers to provide 20% BNG would lead the Plan to prejudice environmental sustainability over the equally important social and economic objectives by impacting on housing delivery and social infrastructure provision.

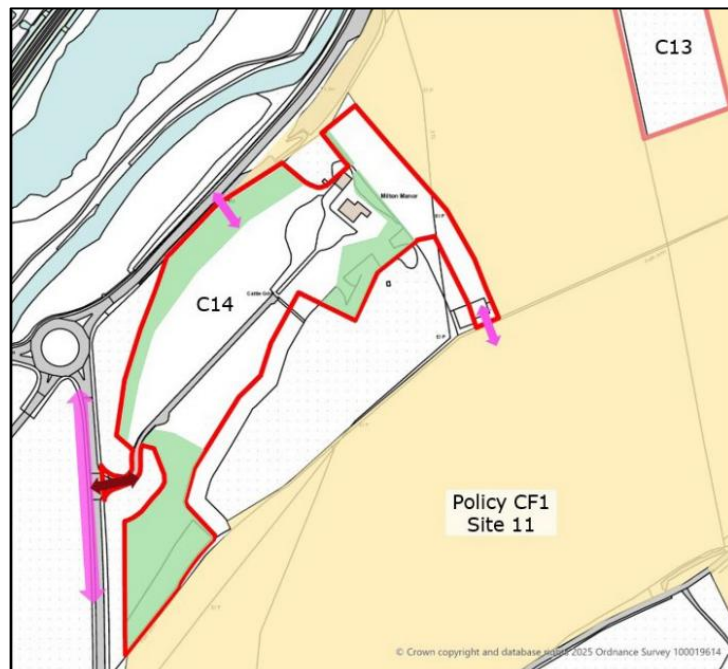
Recommended Amendments

- 2.5 Rather than requiring the achievement of 20% BNG on all development sites, including Milton Manor, the Council should instead work with developers to achieve the national minimum, and it is where viable to do so, help and encourage them to go above and beyond to foster additional planning benefits and weight afforded to the scheme. The full benefits of this approach may not be captured in the metric nor helped by setting arbitrary minimums for BNG and tree cover. Accordingly, the BNG requirements for Policy DS25 should be amended to reflect the National Government's target of 10%.

3. HIGHWAYS ACCESS

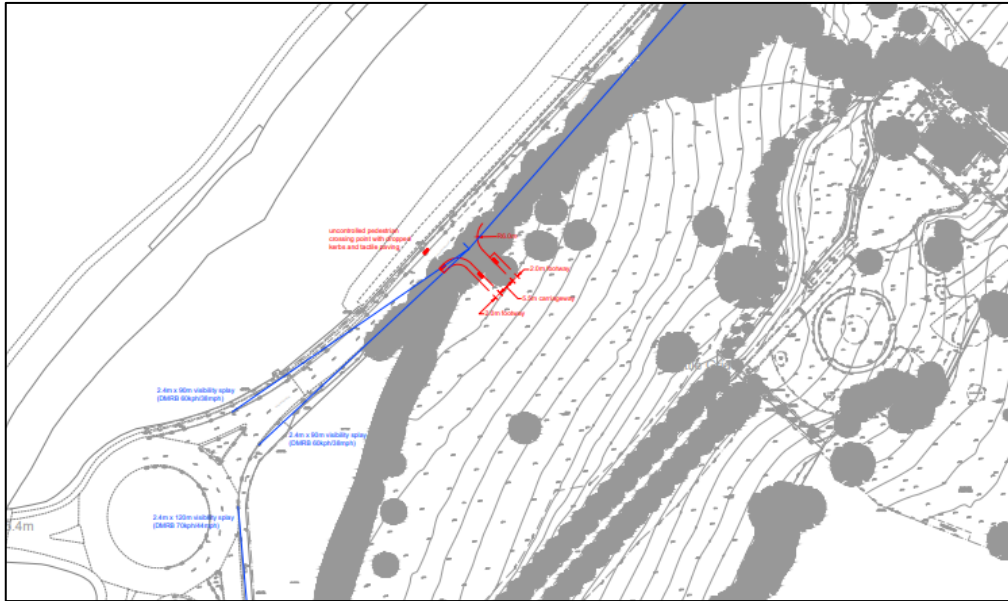
- 3.1 The subject Site benefits from existing high-quality road, cycle and walking infrastructure that connects the Site to the wider city. There is an existing vehicular access to the Site onto Milton Manor Road which is expected to be used as an access as part of a new development, shown in the concept masterplan for Policy C14 allocation Milton Manor House below. An upgraded access has been submitted in detail for the ongoing application (CA/23/01766).

Figure 5.1 – Milton Manor House concept masterplan



- 3.2 However, a vehicular access on the northern boundary of the Site directly onto the A28 Ashford Road has been agreed in principle with KCC Highways and acknowledged by Canterbury City Council. The access has been submitted within the application (shown Figure 5.2).
- 3.3 Discussion with KCC Highways has established that having a northern access onto the A28 Ashford Road would be beneficial for the scheme in establishing improved vehicular movements onto the wider highway network and into Canterbury on the A28. This would be in keeping with draft Policy DS17 on Active and Sustainable Travel of the Draft Local Plan which asks for proposals to maximise connectivity within the Site and to local facilities, open spaces and public transport networks including bus and rail.

Figure 5.2 - Visibility Splays at Proposed A28 Access (CA/23/01766)



- 3.4 A secondary access will also help to distribute traffic more evenly across the whole development, and therefore would improve the amenity and safety of residents overall. In addition, the implementation of a new access in this location would not result in a significant loss of vegetation.
- 3.5 Both accesses are suitable, and conversations are ongoing with KCC Highways. We would recommend that the Access and Transportation approach in Policy C14 is amended to permit flexibility in the access approach to allow both accesses to come forward.

Recommended Amendments

- 3.6 It is recommended that the Concept Masterplan for the Allocation is updated to show the northern site access on to the A28 Ashford Road, as well as at the existing access point.
- 3.7 Policy C14 4(d) should also be amended as follows:

“Provide vehicle access from Milton Manor Road by upgrading the existing access; and/or provide vehicle access from the A28.”

4. CONCLUSIONS

- 4.1 On behalf of CCH Building Solutions Ltd, Icen Projects thank Canterbury for the opportunity to provide representations on the Draft Local Plan to 2042/43. The Milton Manor House Site represents an opportunity for new residential dwellings in the area, to assist in meeting the District's housing needs which has been severely disrupted by Nutrient Neutrality issues, and is capable of delivering approximately 95 homes in a sustainable location. CCH welcome the continued draft allocation while the ongoing planning application (CA/23/01766) is held up due to Nutrient Neutrality issues.
- 4.2 Whilst Policy C14 of the Draft Plan is supported overall, we continue to raise some concerns that would improve the deliverability of the scheme. These changes would be consistent with the planning application that has now largely been through individual consultee commentary.
- 4.3 These relate to:
- The 20% Biodiversity Net Gain (BNG) requirement.
 - The location of the primary access to the Site.
- 4.4 These amendments to the wording of the draft policy would support an appropriately designed scheme that closely aligns with the ongoing planning application that has been shaped through extensive engagement with the Council and relevant stakeholders. The deliverability of this site means that an important, valuable and early contribution to the Council's housing targets can be made, but it is important that the draft allocation policy is suitably worded.