



Appendix 1 to Wates Developments Limited Representations

Our ref 65191/01/MS/HBe
Date 18 May 2026
To Canterbury City Council
From Lichfields
Copy Wates Developments Limited

Subject **Canterbury District Local Plan – Proposed Amends to Policies (Regulation 19)**

1.0 Introduction

- 1.1 This note supports representations made by Wates Developments Limited. It sets out suggested wording amendments to policies in the emerging Canterbury District Local Plan (Regulation 19) which Wates consider are required in order to make those relevant policies and the plan as a whole ‘sound’ (i.e. justified, effective, and legally compliant).

2.0 Proposed Policy Amendments

Policy SS1: Environmental Strategy for the District

Table 1 Proposed Policy SS1 Amends

Reg.19 Proposed Text	Wates Proposed Amended Text (key amends in red)
... 5. Qualifying major development across the district will need to incorporate measures to deliver a minimum 20% biodiversity net gain, while qualifying non-major development will need to deliver a minimum of 10% biodiversity net gain in line with Policy DS25. Proposals must have regard to the Local Nature Recovery Strategy, and the council will work with partners to implement the Strategy. 6. New developments of over 300 homes should incorporate a minimum of 20% tree cover across the site, in line with Policy DS25, and all developments should incorporate new trees and hedgerows in areas of appropriate landscape character, to help restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, help mitigate climate change and contribute to floodplain management. ...	... 5. Development across the district will need to incorporate measures to deliver a minimum of 10% biodiversity net gain in line with Policy DS25. Proposals must have regard to the Local Nature Recovery Strategy, and the council will work with partners to implement the Strategy. 6. New developments of over 300 homes should seek to incorporate a minimum of 20% net increase in tree cover across the site where appropriate, in line with Policy DS25, and all developments should incorporate new trees and hedgerows in areas of appropriate landscape character, to help restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, help mitigate climate change and contribute to floodplain management. ...



Policy SS6: Infrastructure Strategy for the District

Table 2 Proposed Policy SS6 Amends

Reg.19 Proposed Text	Wates Proposed Amended Text (key amends in red)
... 2. New development should make provision for or provide appropriate contributions towards any new or improved infrastructure needed to serve it. Policies within this plan identify the key infrastructure requirements necessary to serve new strategic development allocations including (in addition to key transport infrastructure requirements): a. four new primary schools with early years provision, improvements to existing primary schools, two new six-form entry (6FE) secondary schools with sixth forms; ...	... 2. New development should make provision for or provide appropriate contributions towards any new or improved infrastructure needed to serve it. Policies within this plan identify the key infrastructure requirements to be delivered at the new strategic development allocations to meet their own and wider needs. In addition to the key transport infrastructure needed to support the Council's Movement and Transportation Strategy (Policy SS5), they include: a. four New primary schools with early years provision, improvements to existing primary schools, two new six-form entry (6FE) secondary schools with sixth forms; ...

Policy C16: Land South of Bekesbourne Lane

Table 3 Proposed Policy C16 Amends

Reg.19 Proposed Text	Wates Proposed Amended Text (key amends in red)
Site C16 is allocated for a comprehensive mixed-use development. Planning permission will be granted for development which meets the following criteria: 1. Development Mix Across the site, the development mix will include: a. Approximately 860 new dwellings including affordable housing, older persons housing, accessible housing, self and custom built housing and an appropriate housing mix in line with Policies DS1 and DS2. b. Non-residential development: i. Provision of a community hub as focal area for the community containing a mix of uses including: (1) Local centre including commercial (minimum 540sqm) and local shopping and community uses (minimum 220sqm); (2) Business space (minimum 4,000sqm) including flexible working space; and (3) A mobility hub to serve residents and businesses. ii. Provision of a new 2FE Primary School with early years provision (2.05ha site), located adjacent to the community hub; iii. Provision of a new high-quality wastewater treatment works within the site, or in combination with Site C15, which if feasible will also provide connectivity for Site C17; and iv. Proportionate contributions to community infrastructure in line with Policy DS15. c. Open space provided in line with Policy DS28 2. Design and Layout The design and layout of the site should: a. Coordinate with proposals for neighbouring site C15, site C17 and Site 1 (Policy CF1);	Site C16 is allocated for a comprehensive mixed-use development. Planning permission will be granted for development which meets the following criteria: 1. Development Mix Across the site, the development mix will include: a. Approximately 860 new dwellings including affordable housing, older persons housing, accessible housing, self and custom built housing and an appropriate housing mix in line with Policies DS1 and DS2. b. Non-residential development: i. Provision of a community hub as focal area for the community containing a mix of uses including: (1) Local centre including commercial (minimum 540sqm) and local shopping and community uses (minimum 220sqm); (2) Business space (minimum 4,000sqm) including flexible working space; and (3) A mobility hub to serve residents and businesses. ii. Provision of land for a new 2FE Primary School with early years provision (2.05ha site) if required to support local school place needs, located adjacent to the community hub; iii. Provision of a new high-quality wastewater treatment works within the site, or in combination with Site C15, which if feasible will also provide connectivity for Site C17; and iv. Proportionate contributions to community infrastructure in line with Policy DS15. c. Open space provided in line with Policy DS28 2. Design and Layout The design and layout of the site should:

Reg.19 Proposed Text	Wates Proposed Amended Text (key amends in red)
b. Create a new mixed-use community hub as an easily accessible focal point of the development in the format of a high street or village/ town square containing flexible outdoor public space to use for community events, with pedestrians and cycles prioritised; c. Provide a high-quality built environment, in line with Policy DS13 with an average net density of around 35 dph outside of the community hub. A higher average net density will be encouraged where evidence shows it is appropriate in relation to context, sustainable travel options and impact on views and setting of the World Heritage Site. Higher densities will be expected within and around the community hub; d. Locate older persons housing within the community hub, taking account of any specific identified needs; e. Be informed by a Heritage Statement and Heritage Impact Assessment and where appropriate sustain and enhance the significance of nearby heritage assets, including the setting of the World Heritage Site, in line with Policy - DS30. Lower density development should be provided near to the Little Barton Farm and St Martin's Hospital (The Oast) Conservation Areas and a landscape buffer should be provided adjacent to the Grade II Listed Buildings and Curtilage Listed Buildings at Little Barton Farm and Hoath Farm; f. Mitigate and/or minimise noise impacts from the adjacent railway line; and g. Provide a Minerals Assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations.	a. Coordinate with proposals for neighbouring site C15, site C17 and Site 1 (Policy CF1); b. Create a new mixed-use community hub as an easily accessible focal point of the development in the format of a high street or village/ town square containing flexible outdoor public space to use for community events, with pedestrians and cycles prioritised; c. Provide a high-quality built environment, in line with Policy DS13 with an average net density of around 35 dph outside of the community hub. A higher average net density will be encouraged where evidence shows it is appropriate in relation to context, sustainable travel options and impact on views and setting of the World Heritage Site. Higher densities will be expected within and around the community hub; d. Locate older persons housing close to or within the community hub where appropriate, taking account of any specific identified needs; e. Be informed by a Heritage Statement and Heritage Impact Assessment and where appropriate sustain and enhance the significance of nearby heritage assets, including the setting of the World Heritage Site, in line with Policy - DS30. Lower density development should be provided near to the Little Barton Farm and St Martin's Hospital (The Oast) Conservation Areas and a landscape buffer should be provided adjacent to the Grade II Listed Buildings and Curtilage Listed Buildings at Little Barton Farm and Hoath Farm; f. Mitigate and/or minimise noise impacts from the adjacent railway line; and g. Provide a Minerals Assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations.
3. Landscape and Green Infrastructure The green and blue infrastructure strategy for the site should: a. Assess the site's potential to be functionally linked land, in line with Policy DS20; b. Incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area H6: Littlebourne Fruit belt set out in Canterbury Landscape Character and Biodiversity Appraisal; c. Retain all ancient woodland and ancient or veteran trees, ensuring they are not damaged nor is their future retention threatened, in line with Policy DS21 Opportunities for the enhancement and improve connectivity of ancient woodland should be incorporated where possible;	3. Landscape and Green Infrastructure The green and blue infrastructure strategy for the site should: a. Assess the site's potential to be functionally linked land, in line with Policy DS20; b. Incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area H6: Littlebourne Fruit belt set out in Canterbury Landscape Character and Biodiversity Appraisal; c. Retain all ancient woodland and ancient or veteran trees, ensuring they are not damaged nor is their future retention threatened, in line with Policy DS21 Opportunities for the enhancement and improve connectivity of ancient woodland should be incorporated where possible;

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d. Provide a significant proportion of the natural and semi natural open space in the east and south of the site to: i. Provide a substantial landscape buffer and enhancement to existing ancient woodland and priority habitat; ii. Provide a strategic scale recreational area, including circular dog walking routes, in conjunction with Site C15, highly attractive and accessible to new residents; and iii. Provide visual integration of development edges to transition the surrounding rural landscape. e. Provide open space in the area covered by Little Barton Farm Conservation Area in the south-west of the site; and f. Consider opportunities to improve ecological connectivity with the surrounding landscape, including Old Park and Chequer's Wood.	d. Provide a significant proportion of the natural and semi natural open space in the east and south of the site to: i. Provide a substantial landscape buffer and enhancement to existing ancient woodland and priority habitat; ii. Provide a strategic scale recreational area, including circular dog walking routes, in conjunction with Site C15, highly attractive and accessible to new residents; and iii. Provide visual integration of development edges to transition the surrounding rural landscape. e. Provide open space in the area covered by Little Barton Farm Conservation Area in the south-west of the site; and f. Consider opportunities to improve ecological connectivity with the surrounding landscape, including Old Park and Chequer's Wood.
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 Site C15 and Site 1 (Policy CF1); ii. Connections to the city centre, including upgrades at Spring Lane to create an active travel corridor; iii. Connections to school locations, both within the site and surrounding communities; iv. Connections to wider countryside to the east and south, including to Bekesbourne railway station; and v. Improvements to the PROW network crossing and around the site as required. b. Provide high-quality public transport facilities through the site with a new bus route with bus priority measures, connecting residential areas and the community hub to adjacent local areas, Site C15 and the city centre, including a bus only connection to Dorset Road. Improvements should be provided to off-site bus infrastructure including on Littlebourne Road, such as the provision of new bus lanes and other bus priority measures to facilitate new and improved connections;	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. Connection to Site C15 up to a new bridge to Site 1 (Policy CF1); ii. Providing land and proportionate contributions towards the delivery of a bridge connection to Site 1 (Policy CF1); iii. Connections to the city centre, including upgrades at Spring Lane to create an active travel corridor; iv. Connections to school locations, both within the site and surrounding communities; v. Connections to wider countryside to the east and south, including to Bekesbourne railway station; and vi. Improvements to the PROW network crossing and around the site as required. b. Provide high-quality public transport facilities through the site with a new bus route with bus priority measures, connecting residential areas and the community hub to adjacent local areas, Site C15 and the city centre, including a bus only connection to Dorset Road. Improvements should be provided to off-site bus infrastructure including

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c. Provide improvements to Bekesbourne railway station including cycle access and cycle parking; d. Provide a local distributor road with segregated cycle corridor connecting to Site C15 and to the road network within Site 1 (Policy CF1) through the provision of a new bridge over the railway line. This corridor should serve as the primary vehicle access to the site; e. Provide proportionate contributions to any necessary upgrades of the A2050 New Dover Road (Roman Road) junction with Site 1 (Policy CF1) and the spine road within Site 1 (Policy CF1); f. If necessary, provide for a temporary vehicle access from Bekesbourne Lane only; g. Investigate the severing of Bekesbourne Lane to vehicular traffic, and repurposing for non-motorised vehicles and access in coordination with site C15. There should be no vehicle access from the site to Bekesbourne Lane and proposals for improvements should retain the rural character where appropriate; and h. 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.	on Littlebourne Road, such as the provision of new bus lanes and other bus priority measures to facilitate new and improved connections; c. Provide improvements to Bekesbourne railway station including cycle access and cycle parking; d. Provide a local distributor road with segregated cycle corridor connecting from Site C15 to a new bridge over the railway line that will connect to Site 1 (Policy CF1). Site C16 will provide land and proportionate contributions to the new bridge's delivery. This corridor should serve as the primary vehicle access to the site; e. If necessary, provide for a temporary vehicle access from Bekesbourne Lane only; f. Investigate the severing of Bekesbourne Lane to vehicular traffic, and repurposing for non-motorised vehicles and access in coordination with site C15. There should be no vehicle access from the site to Bekesbourne Lane and proposals for improvements should retain the rural character where appropriate; and g. 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.
5. Phasing and Delivery Unless otherwise agreed by the council and relevant providers: a. Wastewater treatment works should be delivered at the earliest possible stage in the development. b. The primary vehicle access must be delivered prior to the occupation of 300 dwellings, at which point the temporary vehicle access from Bekesbourne Lane must be severed. c. The bus only connection to Dorset Road must be delivered prior to the occupation of 300 dwellings. d. The local distributor road connection to Site 1 (Policy CF1), must be fully operational prior to the occupation of 1,000 dwellings across sites C15 and C16. e. The Local Centre, including commercial and community space, must be delivered prior to occupation of 25% of the total dwellings. f. The business space should be provided as fully serviced land prior to the occupation of 50% of the total dwellings together with a robust Delivery Strategy. g. The primary school site must be transferred to KCC, its successor or nominee at 'nil consideration' and fulfil KCC's General Transfer Terms, prior to the occupation of 100	5. Phasing and Delivery The appropriate phasing of the development in respect of access, infrastructure, and non-residential uses should be identified through the masterplanning and planning application process.

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dwelling, or as otherwise agreed by KCC or its successor. New and improved walking and cycling connections to school locations, both within the site and surrounding communities; are required to be provided prior to the opening of the school on site.	

Policy DS2: Housing Mix

Table 4 Proposed Policy DS2 Amends

Reg.19 Proposed Text	Wates Proposed Amended Text (key amends in red)
... 5. To ensure that new major residential developments provide for the needs of different groups within the community: ... b. Proposals for 300 or more homes will provide a minimum of 10% of the homes as older persons housing. The type of provision should be based on robust evidence of local needs. ...	... 5. To ensure that new major residential developments provide for the needs of different groups within the community: ... b. Proposals for 300 or more homes should seek to provide a minimum of 10% of the homes as older persons housing having regard for market factors. The type of provision should be based on robust evidence of local needs. ...

Policy DS25: Supporting Biodiversity Recovery

Table 5 Proposed Policy DS25 Amends

Reg.19 Proposed Text	Wates Proposed Amended Text (key amends in red)
... 2. All proposals for major development must be accompanied by a Green and, where appropriate, Blue Infrastructure Strategy which takes account of relevant local strategies, such as Biodiversity Strategy; Green Infrastructure Strategy; Pollinator Action Plan; Tree, Woodland and Hedgerow	... 2. All proposals for major development must be accompanied by a Green and, where appropriate, Blue Infrastructure Strategy which takes account of relevant local strategies, such as Biodiversity Strategy; Green Infrastructure Strategy; Pollinator Action Plan; Tree, Woodland and Hedgerow

Reg.19 Proposed Text	Wates Proposed Amended Text (key amends in red)
Strategy; Biodiversity Opportunity Areas; Local Nature Recovery Strategy; and Kent Downs Area of Outstanding Natural Beauty Management Plan. In addition to the non-major development requirements set out in point 1 above, proposals for major development must demonstrate through their Green/Blue Infrastructure Strategy: ... g. On new developments of over 300 homes, proposals must also: i. Provide a minimum of 20% tree cover (existing and new) across the site, in line with the council's Tree, Woodland and Hedgerow Strategy. Where appropriate, the tree cover can contribute to SuDS, open space and local Biodiversity Net Gain contributions; and ... 3. All development must demonstrate and deliver Biodiversity Net Gain, other than where exempt through national legislation, calculated using the Statutory Biodiversity Metric and taking consideration of any national or local guidance on what values / multipliers should be used: a. Non-major development must achieve the statutory minimum Biodiversity Net Gain, which is currently 10%, in accordance with the hierarchy set out in point 4 below. b. Major developments must deliver 20% Biodiversity Net Gain. This is made up of a 10% statutory net gain and a 10% local net gain. The 10% statutory net gain must be in accordance with the hierarchy set out below, however for the purposes of the 10% local net gain, the council will apply points 4(b) (ii), (iii) and (iv) of the hierarchy flexibly. ...	Strategy; Biodiversity Opportunity Areas; Local Nature Recovery Strategy; and Kent Downs Area of Outstanding Natural Beauty Management Plan. In addition to the non-major development requirements set out in point 1 above, proposals for major development must demonstrate through their Green/Blue Infrastructure Strategy: ... g. On new developments of over 300 homes, proposals should also: i. Seek to provide net additional 20% tree cover (existing and new) across the site, in line with the council's Tree, Woodland and Hedgerow Strategy. Where appropriate, the tree cover can contribute to SuDS, open space and local Biodiversity Net Gain contributions; and ... 3. All development must demonstrate and deliver the statutory minimum, which is currently 10%, Biodiversity Net Gain, other than where exempt through national legislation, calculated using the Statutory Biodiversity Metric and in accordance with the hierarchy set out in point 4 below. ...