

DRAFT CANTERBURY DISTRICT LOCAL PLAN (2042/43) REGULATION 19

JOB REF. DATE
DHA/34747 MAY 2026

ON BEHALF OF
GHL CANTERBURY LTD

1.1 INTRODUCTION

- 1.1.1 This representation is made on behalf of GHL Canterbury Ltd in response to the Canterbury City Council ('CCC' or 'the Council') Local Plan Regulation 19 Consultation.
- 1.1.2 These representations have been submitted in the context that GHL Canterbury Ltd (hereafter referred to as "GHL" controls "Land at the Former Chaucer Technology School, Canterbury" (hereafter referred to as "the Site") which forms a draft allocation under Policy C22 of the Regulation 19 Draft Local Plan for approximately 70 new dwellings.
- 1.1.3 Whilst GHL supports the Site being allocated for development, these representations have been submitted in objection to the Local Plan and demonstrates that the plan as currently prepared is "Unsound" with reference to the NPPF (para 36) without amendment to Policy C22, which is necessary to ensure it is "effective" and "justified".
- 1.1.4 Where possible, changes to the Plan are proposed which would assist in making the Plan "Sound" and satisfying the legal tests. However, fundamentally the Council must identify additional sites for specialist housing to meet the needs for older people. The draft Site allocation for "Land at the Former Chaucer Technology School, Canterbury" should therefore be updated to include a care home facility within the Policy allocation.

1.2 SUMMARY OF REPRESENTATIONS

- 1.2.1 Set out below is a summary of the representations.

POLICY/MATTER	COMMENT
Policy DS2 – Housing Mix	Object
Policy C22 – Land at the Former Chaucer Technology School	Object

TABLE 1: SUMMARY OF REPRESENTATIONS

1.3 POLICY DS2 – HOUSING MIX

- 1.3.1 **Object.** As currently worded the policy fails to understand how specialist housing works as a model of provision. It cannot simply be added to general housing developments in excess of 300 dwellings. Specialist housing for older and vulnerable people is complex, depending on:
- Model of provision i.e. whether C2 or C3;
 - Even within the different use classes, there is wide variation in models of care, which can include the provision of central services and facilities that can also place significant space demands on developments;
 - Allied to the above, normally there needs to be as a minimum 50-100 units in a specialist development depending on the type of specialist provision and services being provided;
 - Locational needs, not all locations will have sufficient demand to support specialist accommodation i.e. there needs to be a sufficient population of older people in the local area to support the development. Unlike general market housing, the market area for specialist accommodation tends to be much smaller, with people wanting to stay where they have local ties/family etc.
- 1.3.2 The Policy therefore fails to properly plan for the need for specialist older persons accommodation.
- 1.3.3 The need for specialist accommodation for older persons must therefore be properly planned for as part of meeting the overall housing need in the Borough through specific Site allocations including at Site allocation Policy C22. This is required in order to ensure the Plan is “Justified” and “Effective” and meets the District’s identified need for specialist older person’s accommodation.

1.4 POLICY C22 – LAND AT THE FORMER CHAUCER TECHNOLOGY SCHOOL

- 1.4.1 **Object.** The Policy wording and accompanying allocation plan needs to be revised.
- 1.4.2 GHL welcome CCC’s decision to continue to allocate the Site for development. This reflects the clear suitability of the site, as a sustainable, centrally located brownfield site, appropriate for development. However, the current policy wording for the Site allocation and requires updating for reasons set out below.

Inclusion of Care Home

- 1.4.3 The July 2025 Housing Needs Assessment Update (HNAU) identifies at para 6.26 that there is a need for a minimum total of 2,114 care/nursing home beds within the district until 2040. This need, along with the need for other older persons housing within Canterbury is identified within the HNAU as ‘critical’.

- 1.4.4 The HNAU recommends at para 6.32 that this need is addressed through the next plan period by identifying sites that are suitable to accommodate specialist older persons housing, as well as ensuring that any large strategic allocations deliver a proportion of specialist older persons housing, where appropriate.
- 1.4.5 Despite this recommendation, the draft Local Plan allocates no Sites to specifically deliver specialist older persons housing. Policy C15 requires the delivery of a 1,200sqm healthcare facility, although there are no established parameters of what this healthcare facility should comprise. Other residential Site allocations are simply required to deliver “older persons housing” in line with Policy DS2, however as identified above, Policy DS2 fails to properly plan for the need for this specialist accommodation. The Council therefore simply cannot demonstrate that the Plan is “Justified” or “Effective”.
- 1.4.6 There is a clear and identified need for specialist older persons accommodation within Canterbury that has not been properly planned for as part of the current Local Plan. Sites for such older persons specialist accommodation must therefore be identified in the Local Plan to satisfy this requirement, such as “Land at the Former Chaucer Technology School”.
- 1.4.7 Policy C22 should therefore be updated to allocate an **approximately 80-bed care home and approximately 35 dwellings**.

Detailed Policy Wording & Accompanying Allocation Plan

- 1.4.8 Criterion 2a) of the Policy wording specifies dwellings on the Site should be delivered as flats with an average density of 80dph. As the Policy wording should be updated to include a care home alongside residential development (as discussed above), this reference to flats should be removed and the average density figure reduced to approximately 45dph. This will ensure that a care home and dwellings can both be suitably accommodated on Site without appearing cramped or overdeveloped.
- 1.4.9 The southern half of the Site is currently subject to a live planning application (ref: CA/25/02318) for the development of 34 houses at an average density of c.45dph and Officer's have no in principle objection to these proposals. The Site is better suited to the provision of houses, rather than flats, when reviewed in the context of the surrounding area, and the 45dph density still ensures the development makes efficient use of this brownfield site in line with the NPPF.
- 1.4.10 Criterion 3a) of the Policy wording further requires the provision of a landscape buffer containing natural and semi-natural open space between the development, adjacent railway line and adjacent school. The principle of a landscape buffer in these locations is not objected to, however the buffer area as identified on the plan accompanying the Policy is significant and sterilises a large area of the Site. Whilst it is noted that the plan identifies the buffer is only indicative, the buffer area should be reduced to reflect the size of the buffer areas proposed as part of the live application, which Officers have raised no concerns with. This ensures that efficient use can be made of the Site, whilst still providing sufficient separation between the railway line and the adjacent school.

Proposed Policy Wording

- 1.4.11 On the basis of the above, Policy CC2 must be reworded as follows:

Site C22 is allocated for a ~~residential 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 ~~80-bed care home and approximately 35 70~~ new dwellings including affordable housing, accessible housing and an appropriate housing mix in line with Policies DS1 and DS2.*
- b. 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. Provide a high-quality built environment, in line with Policy DS13, with ~~flats at~~ an average net density of around ~~45 80~~ dph; and*
- b. Ensure that consideration is given to the adjacent school to prevent overlooking.*

3. Landscape and Green Infrastructure

The green and blue infrastructure strategy for the site should:

- a. Provide a landscape buffer containing natural and semi natural open space between development, the adjacent railway line and the adjacent school.*

4. Access and Transportation

The access and transport strategy for the site should

- a. Improve existing cycle and walking links to city centre and other neighbourhood amenities.*

- 1.4.12 This change is required to ensure that the Policy C22 and the plan is “justified” and “effective” and therefore “sound”.

1.5 CONCLUSION

- 1.5.1 These representations have been prepared on behalf of GHF Canterbury Ltd in response to Canterbury City Council's Regulation 19 Local Plan.
- 1.5.2 These representations have been submitted in objection to the Local Plan and demonstrates that as currently prepared the plan is "unsound" with reference to the NPPF (para 36).
- 1.5.3 Fundamentally the Council needs to identify sites for the delivery of specialist older persons accommodation, such as the Former Chaucer Technology School allocation under Policy C22. Allied to this, in order to update the Policy C22 allocation to include a care home facility, additional changes are required to the wording of this Policy.