



Canterbury City Council  
Local Plan 2040

**Vision and Preferred Options Consultation**

July 2021



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# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Canterbury District Local Plan 2040 Vision and Preferred Options 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.

1.1.3 The Council will need to carefully consider its policy choice and ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2019). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system, as set out in the Ministry for Housing, Communities and Local Government (MHCLG) consultations on "Changes to the Current Planning System, August 2020", "Planning for the Future, August 2020" and "National Planning Policy Framework and National Model Design Code: consultation proposals".

1.1.4 Gladman Developments have several land interests in Canterbury which are being promoted through the emerging Local Plan, as set out below:

- Blean Common, Blean;
- Popes Lane, Sturry;
- The Hill, Littlebourne; and,
- Hoath Farm, Canterbury.

1.1.5 These sites have all been submitted through the Council's Call for Sites process, however appended to this submission is a further portfolio highlighting the opportunities for sustainable development at each site location.

## 1.2 Plan Making

1.2.1 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.

## 2 LEGAL COMPLIANCE

### 2.1 Duty to Cooperate

2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Canterbury must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

2.1.3 The revised Framework (2019) introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process<sup>1</sup>. The SoCG(s) should provide a written record of the progress

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<sup>1</sup> PPG Reference ID: 61-001-20180913

made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

## 2.2 Sustainability Appraisal

2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

2.2.2 Canterbury City Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Canterbury Local Plan's decision-making and scoring should be robust, justified and transparent.

## 3 NATIONAL PLANNING GUIDANCE

### 3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019 and July 2021. These publications are revisions to the initial 2012 Framework and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and Planning for the Future consultation.

3.1.2 The revised Framework (2019) introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, national policy 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 to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, Paragraph 16 of the Framework (2021) 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)."***

- 3.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 3.1.4 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. While Annex 2 of the Framework (2021) provides definitions for the terms "deliverable" and "developable.
- 3.1.6 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2021).
- 3.1.7 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that

where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).

- 3.1.8 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

## 3.2 Planning Practice Guidance

- 3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.
- 3.2.2 The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government's ambition to achieve 300,000 new homes annually.
- 3.2.3 Revisions to the PPG on the 20th February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method<sup>2</sup>.
- 3.2.4 It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. We support the Council in its positive approach to plan for above the minimum requirement, which will enable Canterbury to capture a larger proportion

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<sup>2</sup> PPG Paragraph: 005 Reference ID: 2a-005-20190220

of the £7 billion yearly housebuilder contributions<sup>3</sup>. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25<sup>4</sup>, it is also imperative that Canterbury District Local Plan identifies sufficient land to support the delivery of homes.

- 3.2.5 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation's recommendation that local plan should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

### 3.3 National Planning Policy Consultations

- 3.3.1 On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 3.3.2 A further consultation on immediate changes to the current planning system closed on 01 October 2020<sup>5</sup>. Of significant note is a proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.
- 3.3.3 In December 2020 the Government published their response to the 'Changes to the Current Planning System'. This document provides an overview of the consultation responses before highlighting that it has been deemed that the most appropriate approach is to retain the Standard Method in the current form with an additional 35% uplift to the 'post-cap number' for 20 local authorities. The Government's rationale

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<sup>3</sup> MHCLG (2020). 'Planning for the Future'. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

<sup>4</sup> Shelter & Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: [https://england.shelter.org.uk/media/press\\_releases/articles/over\\_80.000\\_new\\_homes\\_will\\_be\\_lost\\_in\\_one\\_year\\_to\\_covid\\_chaos](https://england.shelter.org.uk/media/press_releases/articles/over_80.000_new_homes_will_be_lost_in_one_year_to_covid_chaos)

<sup>5</sup> Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

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behind this approach is to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method.

3.3.4 The latest correspondence from Government regarding the revisions to the Standard Method for calculating local housing need will not affect the minimum local housing need which Canterbury City Council should Plan for.

3.3.5 In her speech at the State Opening of Parliament in May 2021, the Queen announced that the Government will introduce “laws to modernise the planning system, so that more homes can be built, will be brought forward...”. Notes accompanying the speech confirm that a future Planning Bill will seek to create a simpler, faster, and more modern planning system that ensures homes and infrastructure can be delivered more quickly across England. Timings on the publication of the draft Planning Bill remain uncertain, however, subject to the outcomes of this process, the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes. It will be important that the Council keeps abreast with the implementation of these changes to determine any potential implications for the Local Plan.

## 4 VISION AND PREFERRED OPTIONS

### 4.1 Background

- 4.1.1 The Canterbury District Local Plan (CDLP) was formally adopted in July 2017 and sets out the spatial strategy and vision for the District for the period between 2011 and 2031.
- 4.1.2 In addition, the Council developed the Herne Bay Area Action Plan which was adopted in 2010 and contained policies and proposals to achieve the regeneration of Herne Bay town centre.
- 4.1.3 The Council are in the process of developing a new Local Plan to run up to 2040, with early engagement commencing in 2020 through a public consultation focussing on the issues facing the District. The Council are now requesting responses on the draft vision and options for the Local Plan.
- 4.1.4 Gladman support the Council's timescales relating to the new Local Plan as set out in the Local Development Scheme (May 2021).
- 4.1.5 The sections that follow below include specific comments from Gladman on the Council's vision and preferred options document covering a range of the topics and questions that have been posed.

### 4.2 Section one: Draft vision and growth options

#### **Growth Options**

- 4.2.1 Gladman support the Preferred Growth Option which focuses development on Canterbury (Canterbury Focus B) utilising strategic housing growth well connected to the City and expansion of villages. Gladman also welcome the approach to upgrade the A28 road creating a bypass.
- 4.2.2 Notwithstanding the above, it is considered that further clarification is required in relation to the proposed housing requirement figures quoted within the document.

- 4.2.3 The local housing need figure for Canterbury as calculated using the standard methodology equates to 1,120 dwellings per annum (dpa), 320 dwellings higher than the current adopted Local Plan target of 800 dwellings per year.
- 4.2.4 The Canterbury Housing Needs Assessment (2021) highlights some concerns regarding the baseline data within the standard method calculation in relation to over-estimation of population and student concentrations before highlighting that while new student migration estimates provide a correction to the data, these are based upon a short time period. However, the report notes the 2021 Census will provide important updates to the population information but the local housing need figure of 1,120 dpa may enable the infrastructure and employment aspirations of the Council while also addressing the district's affordability issues. Furthermore, the analysis of housing mix and affordability requirements suggests that the local housing need figure should increase to around 1,500 dpa to address affordable need.
- 4.2.5 Taking the above information into account, the minimum local housing need figure that the Council should be looking to meet between 2020-2040 is 22,400 dwellings. Therefore, it is unclear what 'minimum development of 9,000 homes to meet government targets' and 'an extra 14,000 to 17,000 homes by 2040' are in reference to.
- 4.2.6 Gladman strongly encourage the Council to plan for more than the standard method figure in order to support their economic and infrastructure aspirations alongside helping to alleviate affordability issues across the District.
- 4.2.7 Furthermore, Gladman support the indicative recognition of the sustainability of Littlebourne, Sturry and Blean to accommodate limited growth and community infrastructure. In this regard, Gladman highlight our land interests included in the appended 'Portfolio of Sites' which can help contribute to the preferred growth option and contribute to achieving sustainable patterns of growth across the district to address the identified need.

## 4.3 Section three: Housing and new communities

### **Making sure the right types and tenures of housing are provided Issue**

#### **HNC1. How should we make sure the right types and tenures of housing are provided?**

4.3.1 Gladman propose that the in order to ensure that the right types and tenures of housing are provided across Canterbury district, a combination of Option HNC1A and HNC1B should be employed.

4.3.2 Each of the above options offers flexibility in relation to the provision of the mix of homes in the district. However, Gladman suggest that providing a housing mix requirement range which differs depending on the area of the district allows schemes to respond to local circumstances, site-specific issues and ensures identified meet can be met. Alongside safeguarding the plan strategy in future years, allowing housing proposals to respond to changes in circumstances as the plan period progresses and when applications are submitted.

### **Provide opportunities for suitable brownfield and regeneration developments Issue**

#### **HNC3. How should we provide opportunities for suitable brownfield and regeneration developments?**

4.3.3 Gladman support the current approach to brownfield and regeneration opportunities (Option HNC3A).

4.3.4 The Framework is clear that strategic policies and planning decisions should make as much possible use of previously developed or brownfield land and should give substantial weight to the value of using suitable brownfield land for homes and other needs<sup>6</sup>.

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<sup>6</sup> NPPF (2021) – Paragraphs 119, 120 & 121

4.3.5 However, the Council must recognise that an approach to favouring brownfield land is not the sole solution to addressing local housing and employment needs as brownfield sites may not be suitable or available across the settlement hierarchy. The spatial and growth strategy should therefore be supported by suitable greenfield allocations to deliver growth and ensure settlement sustainability.

4.3.6 Furthermore, if the Council wish to address the affordability issues across the district then they must balance the approach between brownfield sites and greenfield land as the significant costs associated with the development of previously developed land may impact the viability of residential schemes and ultimately reduce affordability housing provision.

#### **Making sure that the right densities are delivered in developments across the district Issue**

#### **HNC4. How should we make sure that the right densities are delivered in developments across the district?**

4.3.7 It is acknowledged that the Council's preferred option in relation to the density of new developments is Option HNC4C whereby specific densities or a range of densities for area are set for different areas of the district to make best use of the land.

4.3.8 Gladman support an approach which does not set a blanket requirement across the district. Indeed, an approach which varies across the district, including the provision of minimum density ranges dependant on location enables proposals to respond to site-specific circumstances and constraints.

#### **Making sure housing is provided for rural communities Issue**

#### **HNC5. How should we make sure housing is provided for rural communities?**

4.3.9 Gladman support the preferred approach to delivering residential growth at rural communities (Option HNC5C) which looks to provide opportunities for rural service

centres, local centres and villages to grow in accordance with their size and character where affordable housing provision is included.

- 4.3.10 This approach recognises the need for rural communities to receive proportionate growth in order to ensure the sustainability and future vitality of communities and their services, delivering identified housing needs while also acknowledging that affordable housing is less likely to come forward independent of market housing provision.
- 4.3.11 In addition, the preferred option references villages boundaries across the aforementioned settlement types. Gladman highlight that the Council must be proactive in their approach to settlement boundaries, ensuring sufficient flexibility is provided to ensure that sustainable development adjacent settlements is not arbitrarily restricted from coming forward in accordance with the positive approach to growth required by the Framework.

### **Supporting sustainable living in new communities Issue**

#### **HNC6. How can we support sustainable living in new communities?**

- 4.3.12 Gladman support the development of sustainable communities and the provision of well-connected social and community infrastructure. However, it is important that any policy requirement provides sufficient flexibility relating to accessibility times and distances to provide the ability to respond to site specific circumstances.

### **Making sure all design is high quality Issue**

#### **HNC7. How should we make sure all design is high quality?**

- 4.3.13 It is considered that the most appropriate and effective method to ensure all development is designed to a high-quality is the new National Design Guide and National Model Design Code as set out in Chapter 12 of the NPPF (2021). This tool ensures that clear design vision and expectations are provided across the local authority area giving certainty to applicants and local communities. Additionally, the tool kit helps local communities and stakeholders to shape local design needs

through identifying local special characteristics and highlighting how these should be reflected in policy and guidance.

- 4.3.14 Such design codes can be prepared at a range of scales including area-wide, neighbourhood or site-specific scale and can be submitted as part as a planning application having effectively engaged with the local community and accounted for local aspirations<sup>7</sup>. These design guides are less prescriptive than having to comprehensively masterplan sites as part of the Local Plan and ensure flexibility to adapt to potential issues which arise during the application process. Additionally, applications and development proposals are always an iterative process involving input from a number of stakeholders alongside engagement and reengagement with the local community; reverting to a local design code process to ensure high-quality design would ensure that developments can come forward in the most appropriate manner and reflect current ideas and aspirations at the time of the application.

### **Delivering low carbon and energy efficient housing Issue**

#### **HNC8. How can we deliver low carbon and energy efficient housing?**

- 4.3.15 Gladman contend that the most appropriate mechanism to deliver low carbon and energy efficient developments is through the relevant Building Regulations. In this regard, it is considered that the strategy set out in Option HNC8B 'early introduction of Future Homes Standard' would provide an achievable approach, while also seeking to be ambitious through early delivery of such standards.
- 4.3.16 Requiring all new homes to be delivered to net zero or obligatory payments for failing to meet such standards (Option HNC8C) may have cause viability issues across developments and impede the delivery of other objectives such as affordable housing or community infrastructure.

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<sup>7</sup> NPPF (2021) – Paragraph 129.

## **Providing accessible and disability-friendly homes Issue**

### **HNC10. How should we provide accessible and disability-friendly homes?**

- 4.3.17 Gladman support the preferred option set out in (HNC10C) which provides indicative dwelling requirements of 15% M4(2) and 5% M4(3) on major developments and strategic sites.
- 4.3.18 Notwithstanding the above, Gladman highlight that any policy requirement must be fully justified through clearly evidenced need considering the standards set out in the PPG alongside the impact being considered through a viability assessment. This is confirmed by Eric Pickles' Written Ministerial Statement (WMS) (2015),

***“The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.”***

- 4.3.19 While we do not object to the principle of this policy which intends to provide quality living environments for all communities, Gladman submit that there should be flexibility incorporated into the policy which considers site specific suitability and viability.

## **Supporting opportunities for self and custom-build housing**

### **Issue HNC13. How should we support opportunities for self and custom-build housing?**

- 4.3.20 In principle, Gladman support the preferred approach, however it is imperative that any policy requirements are established on identified need as set out in the Council's Self-Build Register and Housing Need Assessment papers. Additionally, flexibility should be built into the policy to recognise that plots which do not sell within a certain time period, for instance 12 months of marketing, can be developed for alternative housing types.

## 4.4 Section six: Movement and transport

### **Supporting the rapid transition to zero emissions vehicles Issue**

#### **MT3. How will we support the rapid transition to zero emissions vehicles?**

- 4.4.1 Preferred Option (MT3B) sets out the Local Plan approach to delivering Electric Vehicle charging points at off and on-street parking spaces alongside spaces at commercial development.
- 4.4.2 Gladman do not object to the principle of this policy but highlight that any requirement for new developments to provide such requirements should be tested through the Viability Assessment accompanying the Local Plan. In addition, suitable flexibility to allow the Plan to respond to site specific circumstances should be incorporated within the policy.

## 4.5 Section seven: Historic and natural environment

### **Protecting and enhancing biodiversity and green and blue infrastructure (parks, rivers and other spaces)**

#### **Issue NE3. How should we protect and enhance biodiversity and green and blue infrastructure?**

- 4.5.1 Gladman consider that the preferred option (NE3C) which requires new development to achieve a 20% biodiversity net gain is more restrictive than current and emerging national policies and legislation.
- 4.5.2 The NPPF currently only requires planning policies and decisions to minimise impacts on and provide net gains for biodiversity, with no specific, measurable figure set<sup>8</sup>. However, the Government's proposes impose a mandatory requirement for development to achieve a 10% net gain in biodiversity through the Environment Bill 2019-21. The Bill is now due to have the next Report Stage on 6<sup>th</sup> September 2021.

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<sup>8</sup> NPPF (2021) – Paragraph 179.

- 4.5.3 In this regard, Gladman propose that Option NE3B should be taken forward as the Local Plan progresses.

### **Protecting and enhancing the character of our valued landscape Issue**

#### **NE4. How should we make sure that the local landscape designations (areas of high landscape value) continue to protect our valued landscapes?**

- 4.5.4 Gladman do not support any of the proposed amendments to the Blean Woods LLD which at present meets the designation criteria, as highlighted within the consultation document.
- 4.5.5 While it is important to protect important character areas, unduly creating or increasing policy designations which may inhibit the development of otherwise sustainable proposals across the district may affect the delivery of identified housing need, particularly critical when accounting for the affordability issues in Canterbury. In this regard, where designations are achieving their purposes against the assessment criteria it would be inappropriate to amend them.

### **Making sure our approach to green gaps is still effective**

#### **Issue NE5. How should we make sure our approach to green gaps is still effective?**

- 4.5.6 Gladman are supportive of the preferred approaches to green gap policies and designations.

### **Development where there are coastal protection and overtopping hazard zones**

#### **Issue NE12. What should we do about groundwater protections?**

- 4.5.7 Gladman are supportive of the Council's preferred approach to work proactively to support applicants and set out clear criteria for development proposals in groundwater protection zones.

- 4.5.8 It is important that the Council continue this proactive approach when dealing with water quality concerns at the Stodmarsh protected site and develop a strategy to mitigate any impacts.

## 5 CONCLUSIONS

### 5.1 Summary

- 5.1.1 Gladman welcomes the opportunity to comment on the vision and preferred options that are currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.
- 5.1.2 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.
- 5.1.3 In addition, Gladman have included an appendix to the representations which includes a Portfolio of Sites where Gladman have land interests, these have also been submitted through the Call for Sites processes.
- 5.1.4 We hope you have found these representations informative and useful towards the preparation of the Canterbury City Local Plan and Gladman welcome any future engagement with the Council to discuss the considerations within forwarded documents.

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## APPENDICES

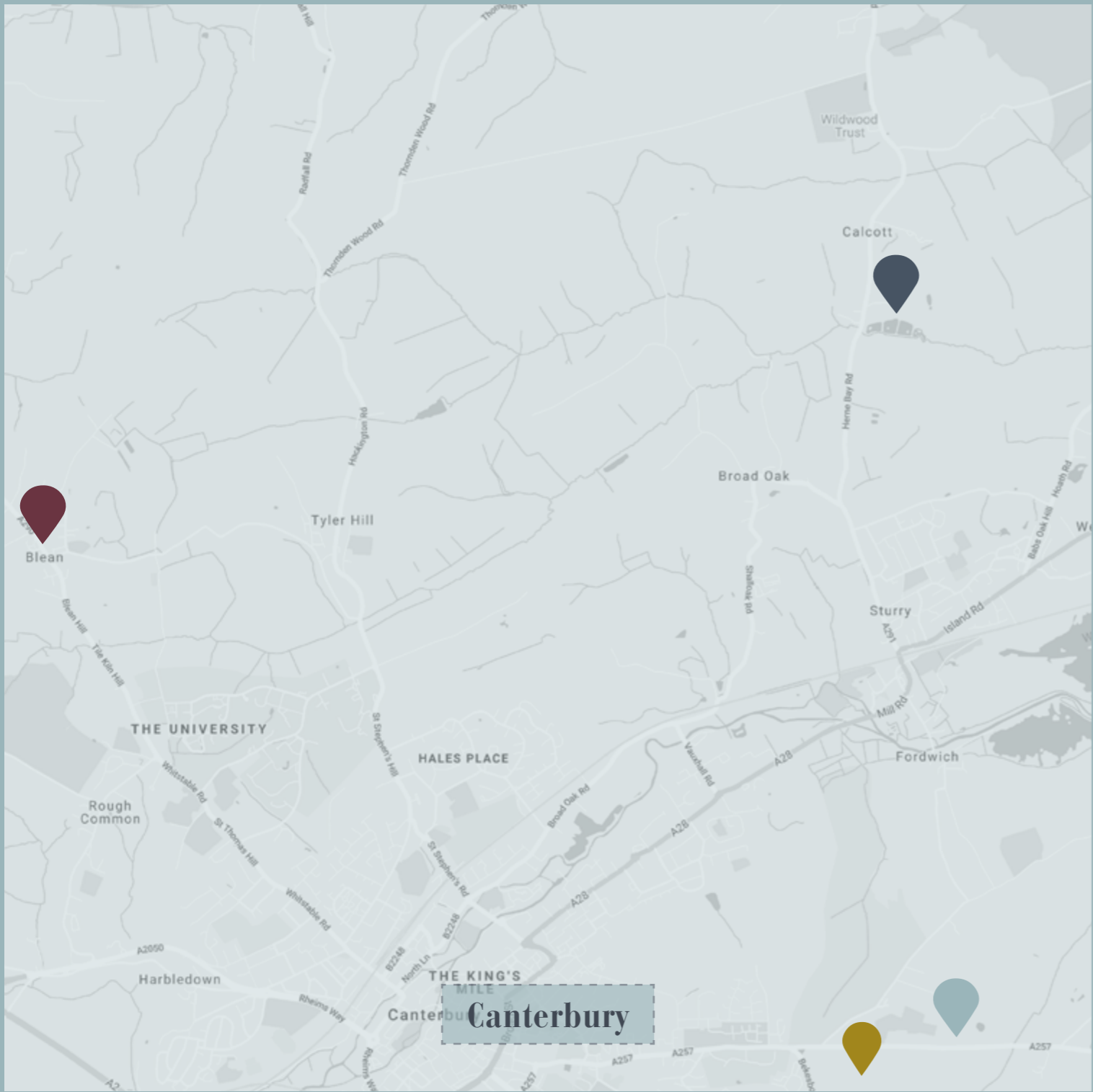
### Appendix 1: Gladman Developments Portfolio of Sites

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# Opportunities for Sustainable Growth in Canterbury

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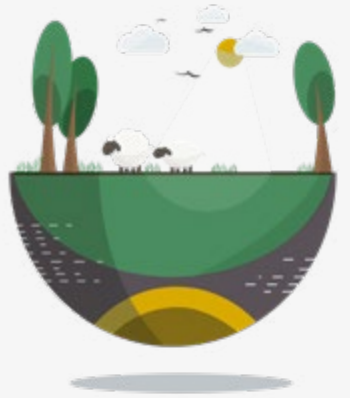




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# Introduction

Gladman is a privately funded, family run business with over 30 years' experience in the land and development industry. From our beginnings in housebuilding, through to commercial and industrial properties, we have a solid history of delivering sites quickly. We provide professional services for landowners, many of whom are residents in the communities.

## HOW WE ENSURE A SITE IS VIABLE AND DELIVERABLE

We enter into transparent Promotion Agreements with landowners rather than the more complex Option Agreements and thoroughly review a site's viability before an Agreement is entered with a landowner. This ensures that the proposals can provide the full policy compliant affordable housing requirement and CIL compliant planning obligations when an application is submitted. On average, Gladman provide circa £12,000 per housing plot on schemes throughout the UK.

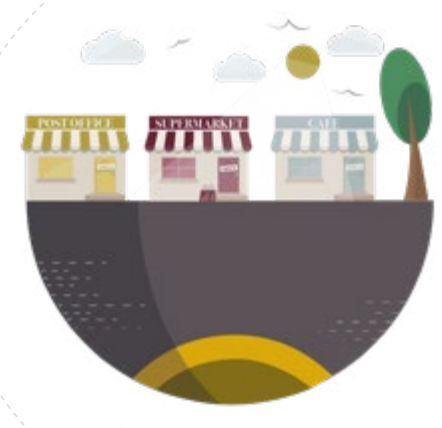
Our initial viability work and detailed due diligence ensure that proposals are deliverable without delay. Once outline planning consent is achieved, a development will normally commence within 18-24 months. In many cases a planning condition can be attached reflecting this timescale to give the Council certainty on delivery.



Once planning consent is achieved, we sell the site to a housebuilder. Having sold sites to all the major Plc house builders as well as to a huge range of small to medium sized housebuilders and Registered Providers over the past few years, we ensure that that the outline planning application documents are compatible with future reserved matter applications.

## ENGAGEMENT WITH THE COUNCIL

We have a wide range of sites within Canterbury that we are promoting on behalf of landowners. The location of these sites are included within this portfolio and we would welcome the opportunity to have discussions on the development potential with the Council.



# What could the sites deliver?

The proposed sites could deliver many social, economic and environmental benefits to their local areas and the wider Canterbury area. Gladman would be happy to discuss specific benefits that the schemes could provide.

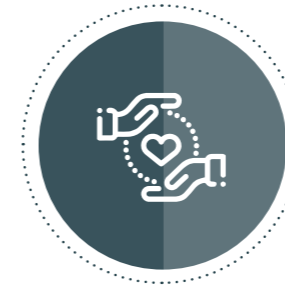
## RESIDENTIAL

Each site has the potential to deliver a substantial number of dwellings to assist Canterbury in meeting its housing needs and maintain a five-year housing land supply. As with all its schemes, Gladman will provide full policy compliant affordable housing on site, helping the Council to meet its affordable housing targets.



## RECREATIONAL GREEN SPACE

The sites will be designed to accommodate public open space, often including equipped areas of play, footpaths, trim trail equipment and cycle links. Where possible, the sites will be incorporated into the wider Public Right of Way network, offering real benefits to the local community.



## COMMUNITY

Appropriate contributions will be made to local education, medical and library facilities to support the regeneration of local communities. Contributions could also be made to local clubs, groups or projects. As with all new developments, new residents will also generate an increase in local expenditure, providing increased spending in the local area as well as the wider area.



## BIODIVERSITY

Biodiversity of the sites will be protected, diversified and improved as part of the proposals. An ecological appraisal will be completed as part of any future applications and will identify mitigation measures should any protected species be found on site. Alongside retention of existing hedgerows and trees where possible, new landscaping, private gardens and informal green spaces can achieve net gains in biodiversity.



## Land at Blean Common, Blean

**Settlement Tier:** Local Centre

We are promoting Land at Blean Common, Blean for residential development. The site is 4.20 hectares and capable of delivering approximately 85 dwellings. We would welcome an opportunity to discuss the site with the Council and the development it could deliver.

### POTENTIAL DEVELOPMENT PROPOSALS

- Proposals for the development of up to 85 new homes, including 30% affordable housing provision.
- The site represents a suitable and sustainable location for housing, well related to the existing built form.

### WHAT THE DEVELOPMENT COULD DELIVER

- An opportunity to contribute towards identified housing needs, including affordable housing provision in an area where there has been historical under-delivery;
- Proposals will provide 30% open space provision, for the benefit of new residents and the existing wider community;
- Ecological benefits through the protection and enhancement of existing wildlife corridors as well as provision of new Green Infrastructure within the development ensuring net biodiversity gain; and
- Economic benefits including increased spending at local shops and services.

### KEY SITE INFORMATION

- The site measures 4.20 hectares in size.
- It lies entirely within Flood Zone 1
- Accessible from the A290, the site is within walking and cycling distance of a range of services and facilities.
- The site is also accessible by a range of transport modes suitable for commuting and leisure purposes.
- The site is well contained within the landscape and important trees and other landscape features will be retained where possible.





## Land off Popes Lane, Sturry

**Settlement Tier:** Rural Service Centre

We are promoting Land off Popes Lane, Sturry for residential development. The site is 9.36 hectares and capable of delivering approximately 140 dwellings. We would welcome an opportunity to discuss the site with the Council and the development it could deliver.

### POTENTIAL DEVELOPMENT PROPOSALS

- Proposals for the development of up to 140 new homes, including 30% affordable housing provision.
- The site adjoins existing residential development in Sturry and forms a logical extension to the north of the settlement.
- Development has the potential include over 5ha of public open space, including a new equipped children's play area, a trim trail with outdoor exercise equipment and a junior sized grass sports pitch.

### WHAT THE DEVELOPMENT COULD DELIVER

- An opportunity to contribute towards the housing needs identified, including affordable housing provision;
- Structural landscape planting and the retention and positive management of key landscape features including enhanced Green Infrastructure ensuring net biodiversity gain;
- 5.4 ha of formal and informal open space, including a fully equipped children's play area, junior grass sports pitch and a trim trail with outdoor gym equipment (the open space accounts for over 50% of the gross site outline application area);
- And economic benefits including increased spending at local shops and services.

### KEY SITE INFORMATION

- The site measures 9.26 hectares in size.
- Lies entirely within Flood Zone 1.
- The site is within a 15 minute walk of Sturry Village centre with a number of other services and facilities within close proximity of the site including Sturry Railway Station which is located 1km from the site.
- The site is well contained within the landscape and important trees and other landscape features will be retained.





## Land at Hoath Farm, Canterbury

We are promoting land at Hoath Farm, Canterbury for residential development. The 77 hectare site presents a good opportunity to deliver high quality, sustainable development to help meet identified housing needs.

### POTENTIAL DEVELOPMENT PROPOSALS

- Proposals for the development include up to 1320 new homes including 30% affordable housing provision.
- The site is sustainably located to the east of Canterbury City along the A257 Littlebourne Road in close proximity to public transport routes and facilities.
- A number of principles will be applied to the design process of the development including Garden City Design Principles, net gains in biodiversity and on and off-site community.

### KEY SITE INFORMATION

- The site measures 77 hectares in size.
- Lies entirely within Flood Zone 1.
- The site fronts Littlebourne Road which has a pedestrian footpath and numerous bus stops which have very frequent services running between Canterbury and Sandwich

### WHAT THE DEVELOPMENT COULD DELIVER

- An opportunity to significantly contribute to the housing needs, including affordable housing provision identified in the adopted and emerging Local Plans supporting the economic potential of the City. Potential for self-build plots have been identified within the site.
- The development proposal will be landscape-led providing an attractive and healthy environment for residents both new and existing. The site layout will seek to achieve Building for Life 12 Very Good standards as a minimum.
- New pedestrian and cycle routes through the site and linking to the wider network alongside new open space for recreation activities and children's play. An area for allotments has also been identified.
- Additional planting, landscaping and the creation of habitat to potentially create ecological corridors and retain mature trees and hedgerows where possible.





## Land at the Hill, Littlebourne

We are promoting land at the Hill, Littlebourne for residential development. The 15.77 hectare site presents a good opportunity to deliver high quality, sustainable development to help meet identified housing needs.

### POTENTIAL DEVELOPMENT PROPOSALS

- The 15.77ha site could be either delivered as a larger scheme spanning from the Hill to Bekesbourne lane, or a smaller site (5.76ha) infilling current development on the Hill.
- The site is sustainably located less than 5km to the east of the City of Canterbury, in a settlement that has been identified in the Local Plan as a location where growth could be accommodated.
- The site benefits from being close to public transport links creating less reliance on the private car.
- The site could provide between 100-300 dwelling including 30% affordable housing.
- A number of design principles will be applied to the design process of the development, and a principles document has already been established setting out how good design could be delivered.

### KEY SITE INFORMATION

- The site measures 15.77ha
- Lies entirely within Flood Zone 1.
- The site fronts the Hill, and is within sustainable walking distance of a range of facilities and services available in Littlebourne.
- The site is made up of Grade 3 Agricultural land and thus is of low quality for agricultural use
- The site has no known constraints that could prevent development at this location.

### WHAT THE DEVELOPMENT COULD DELIVER

- An opportunity to significantly contribute to local housing needs, including affordable housing provision identified in the adopted and emerging Local Plans.
- A well-designed housing scheme that incorporates good design principles, and reacts to climate change.
- The site could provide a net gain in biodiversity, providing a large proportion of newly accessible public open space, a circular walking route, potential allotments, community gardens and a fully equipped children's play area.
- New pedestrian and cycle routes providing safe connections from the site to the bus stops along the Hill.
- Additional planting, landscaping and the creation of habitat to potentially create ecological corridors and retain mature trees and hedgerows where possible.



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## Next Steps

Thank you for taking the time to look at our proposals. We would welcome your views and are happy to answer any questions that you may have.

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