

Draft Canterbury District Local Plan 2040 Regulation 18 Consultation 2024

# STRATEGIC LAND **AVAILABILITY ASSESSMENT ADDENDUM**

(DECEMBER 2023)

# **Contents**

1. Introduction	3
2. New SLAA Submissions	4
3. Omission sites	7
4. Review of Available Sites	17
5. Summary	18

Appendix A: Assessment of new SLAA submissions July 2022 - September 2023

Appendix B: Review of omission site assessments

## 1. Introduction

- 1.1. This is an addendum report which should be read alongside the Strategic Land Availability Assessment (SLAA) dated July 2022.
- 1.2. Between July 2022 and September 2023, 20 new site submissions (SLAA references SLAA300 SLAA319) were received in line with the council's information requirements.
- 1.3. The newly submitted sites have been assessed in accordance with the methodology outlined in the SLAA document (July 2022). The outcomes of the assessments are set out in Section 2.
- 1.4. As part of the Regulation 18 consultation which ran from 24th October 2022 to 16th January 2023 the council received a number of representations from site owners, promoters and developers providing comments on the assessment of sites set out in the SLAA (July 2022). These comments, together with any additional evidence provided, have been reviewed by officers. The conclusions and outcomes of the assessments are set out in Section 3.
- 1.5. Following the close of the Regulation 18 consultation (2022), 4 sites were withdrawn from the SLAA due to having been granted planning permission, or having their availability status changed. The reasoning is set out in Section 4.

#### 2. New SLAA Submissions

- 2.1. Between July 2022 and September 2023, 20 new site submissions (site references SLAA300 SLAA319) were received in line with the council's SLAA information requirements. Unfortunately, one additional submitted site did not meet information requirements and was not assessed.
- 2.2. The newly submitted sites have been assessed in accordance with the methodology outlined in the SLAA document (July 2022).
- 2.3. The 20 new site submissions were spread across different parts of the district and were a range of different sizes, ranging from 0.09 hectares to 247.53 hectares. 4 sites were located in Canterbury, 4 in Whitstable, 3 in Herne Bay and 9 in rural parts of the district. The location and site boundaries of each of the sites submitted for consideration within the SLAA are outlined on the Call for Sites map on the Canterbury City Council website.
- 2.4. A total of 7 sites were found to be suitable, available and achievable in line with the council's methodology. 5 of these sites were proposed for residential use, or mixed use with residential. 1 site was proposed for commercial land uses and 1 site was proposed for railway infrastructure improvements. These suitable sites are outlined in Table 2.1 and the full site assessments are included in Appendix A. An estimate of development potential of these sites has been provided, however for any sites taken forward for proposed allocations, further work will be undertaken to refine potential development capacity.

Table 2.1 - Newly submitted sites assessed as suitable, available and achievable

Site Ref	Site name	Proposed Use	Indicative Yield
SLAA306	Land south and west of 62 Burgate	Mixed	35 dwellings
SLAA309	Nackington Police Station	Housing	30 dwellings
SLAA310	Land East of Chestfield Road	Housing	152 dwellings
SLAA311	Land at Ashford Road	Commercial	2,600sqm floor space
SLAA313	Goose Farm	Housing	12 dwellings
SLAA318	Canterbury West Station	Railway infrastructure Improvements	N/A
SLAA319	Land north of University of Kent	Mixed	1,806 dwellings

2.5. Of the new submissions, 11 sites were found to be unsuitable and a further 2 sites were found to be technically suitable, however the development proposed conflicts with existing policy. A summary of the site assessment outcomes is provided in Table 2.2. The full site assessments can be viewed in Appendix A.

Table 2.2 - Newly submitted sites assessed as unsuitable

Site Ref	Site name	Proposed Use	Assessment Outcome
SLAA300	Land West of Adisham and south of Railway	Housing	There is concern regarding the impact of the site on the character of the area and the capacity on the local highways network; and the site is located in an area with limited access to day to day services and public transport therefore future occupiers would be dependent upon private car to access day to day services.
SLAA301	Land at Thanet Way	Housing	Policy conflict: The site is located within a Green Gap.
SLAA302	Land to the north of the railway line and south of Bekesbourne Lane	Housing	Suitable access to the site has not been demonstrated to be achievable; and the site is located in an area with limited access to day to day services and public transport therefore future occupiers would be dependent upon the private car to access day to day services.
SLAA303	Land East of Bogshole Lane	Housing	Suitable access to the site has not been demonstrated to be achievable; and the site is located in an area with limited pedestrian access to day to day services and public transport therefore future occupiers would be dependent upon the private car to access day to day services.
SLAA304	Land between A2990 and A299 Thanet Way, Whitstable	Housing	Due to the existing highway, and consideration of proximity to junctions, there is no safe pedestrian or cycle access to the site.
SLAA305	Heymar	Housing	Policy conflict: The site is located within a Green Gap.

Site Ref	Site name	Proposed Use	Assessment Outcome
SLAA307	Chartham Paper Mill	Mixed use (Employment and housing)	The site is located in an area of high flood risk (Flood Zone 3). There are also concerns regarding the ecology and heritage of the site due to its location within priority habitat and a conservation area.
SLAA308	Abbottswood	Housing	Suitable access to the site has not been demonstrated.
SLAA312	Land West of Bodkin Farm, Thanet Way, Chestfield	Housing	There are concerns regarding local highway capacity issues; ability to provide suitable access to the site; and concerns regarding landscape and flooding impact.
SLAA314	Land off Well Lane, Fordwich	Housing	There are concerns regarding heritage and landscape impacts; and there is uncertainty about the potential to provide adequate access to the site and concerns regarding the capacity of the surrounding highways network. The site is located in an area with poor pedestrian access to public transport therefore future occupiers would be dependent upon the private car to access day to day services.
SLAA315	Land west of Herne Bay Road, Sturry	Housing	There is concern regarding the impact of the site on the character of the local area and the surrounding landscape. The site is located in an area with poor pedestrian access to public transport therefore future occupiers would be dependent upon the private car to access day to day services.
SLAA316	Land south of Staines Hill, Sturry	Housing	There is concern regarding the ecology, heritage and landscape impacts of the site. The site is located entirely within Priority Habitat and within the Westbere conservation area.
SLAA317	Land at Reculver Caravan Park	Sports and Leisure (incl Hotel)	The site is located in an area of high flood risk (Flood Zone 2 and 3) and there is concern regarding the heritage impacts. The site is located in an area with limited pedestrian access to day to day services and public transport therefore future occupiers would be dependent upon the private car to access day to day services.

## 3. Omission sites

- 3.1. 52 assessments for sites not included in the draft Local Plan (2022), known as omission sites, were challenged by their promoters through representations submitted to the draft Local Plan (2022) Regulation 18 consultation.
- 3.2. Officers have reviewed these representations and additional evidence and reassessed the sites against the SLAA methodology. Assessments were also checked for factual errors where appropriate and amended accordingly. Table 3.1 sets out the council's review of these representations and where any amendments to the site assessments have been made.
- 3.3. Of the omission sites, 7 sites (SLAA002 SLAA019, SLAA075, SLAA111, SLAA114, SLAA148 and SLAA270), had their assessments amended due to updated information provided or errors identified in the previous assessment. The full re-assessments of these sites are included in Appendix B. No sites had their suitability status changed.

Table 3.1 - Review of omission sites with submitted representations

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA002	Land North of Thanet Way, Chestfield	Disputing our assessment of impact on the local highway network, with additional evidence from KCC.	Column AL has been amended following additional technical evidence which demonstrates that highway concerns have now been resolved. The site remains unsuitable due to being located wholly within the Green Gap and wholly within an area of open space, as identified in the Open Space Strategy.
SLAA004	Stoneyfields, Bullockstone	Disputing our assessment of the site as Protected Open Space.	The site remains unsuitable due to a conflict with the Protected Open Space designation.
SLAA005	Land on Bullockstone Road	Disputing our assessment of the site as Protected Open Space.	The site remains unsuitable due to a conflict with the Protected Open Space designation.
SLAA019	Land between Bigbury Road and Tonford Lane	Comments and information to update the SLAA assessment provided.	Columns L and M on Planning History have been updated following comments from the landowner. The site remains unsuitable due to landscape, heritage and ecology concerns, access concerns and the site being isolated from day to day services and public transport.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA021	Land adjoining Honey Hill Farmhouse, Blean	Questioning why we did not allocate the site despite being assessed as suitable.	The site was assessed as suitable in the SLAA (2022). The reasoning for site selection/rejection is set out within the Development Topic Paper.
SLAA023	Land South of Staines Hill, Sturry	Site originally submitted as a natural environment site. They would now like it to be residential.	The site was assessed as a new residential submission under SLAA316, and was found to be unsuitable due to ecology, heritage and landscape concerns.
SLAA035	Land at Thanet Way, Herne Bay	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to the majority of the site being a Local Wildlife Site, concerns around access and site being located adjacent to a waste disposal site.
SLAA043 SLAA182	Land at Colewood Road, Swalecliffe	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and flooding concerns.
SLAA049	Land to the North of Orchard View, Broad Oak	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and access concerns.
SLAA050	Land off Hardres Court Road, Lower Hardres	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and heritage concerns.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA071	Land at Trenley Drive	Disputing assessment outcome, additional evidence provided: Proposed access diagram	The site remains unsuitable due to access concerns, and the site being isolated from day to day services and public transport. KCC have confirmed the access onto Stodmarsh Road is of limited width and cannot accommodate the number of dwellings proposed. There is no access to any footways in the local area and no safe access to the existing bus stops on Littlebourne Road. Stodmarsh Road is also not able to accommodate the proposed development being of limited width to allow two-way vehicle movements.
SLAA072	Land at Molehill Road, Chestfield	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to being located in the Green Gap.
SLAA073	Studd Hill, Herne Bay (Land at Whitstable Road)	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape concerns and being isolated from day to day services and public transport.
SLAA075	Land adjacent to Old Thanet Way, Whitstable	Comments providing information to update the SLAA assessment. Disputing our assessment on landscape, heritage and access, with explanatory comments supplied.	KCC have confirmed that a suitable access can be achieved, therefore column AK in the SLAA assessment has been updated. Column AP on Townscape/Landscape has been updated with more accurate wording following an error in the previous assessment. Heritage concern remains a reason for unsuitability as the site is bordering the curtilage of a listed building. The site remains unsuitable due to landscape and heritage concerns. It was concluded that the site should remain Protected Open Space and therefore remains unsuitable.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA081	Land Lying to the South East of Dargate Road	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and access concerns, and the site being isolated from day to day services and public transport.
SLAA082	New Place Farm, Ickham	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape, heritage and access concerns, and the site being isolated from day to day services and public transport.
SLAA083	Land adjacent to Lamberhurst Farm	Disputing assessment outcome, based upon the site being allocated in the Regulation 19 version of the Swale Borough Council Local Plan.	The site remains unsuitable due to landscape concerns, access concerns and being located in an area with limited access to day to day services and public transport.  As the Swale Borough Council Local Plan is still at an early stage, it does not carry significant weight when considering a site's suitability for allocation.
SLAA086	Land adjacent to The George Pub, Chartham	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to heritage, ecology and flooding concerns.
SLAA087	Land at Chartham Hatch	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and access concerns, and the site being isolated from day to day services and public transport.
SLAA091	Land adjacent to Milborough House	Arguing a benefit for allocation to ease transport concerns for draft allocation R18 (SLAA011).	The site remains unsuitable due to being located in the Green Gap.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA111	Land at Butlers Court Farm	Disputing assessment outcome, comments to amend SLAA assessment provided.	Columns J and AK have been amended following comments from the representation. Column J - current use of site has been updated. Column AK - minor highways wording error has been corrected. Officers reviewed the representation comments in detail however it was not considered that any other parts of the SLAA assessment required amending. Site remains unsuitable due to landscape and access concerns.
SLAA114	Land at Sargeants Parade, Parham Road	Comments providing information to update the SLAA assessment. Disputing assessment outcome and disputing our assessment of the site as Protected Open Space.	Column E on Proposed Use has been amended following comments from the representation.  The Protected Open Space designation has been reviewed and the conclusion is that the site remains unsuitable.
SLAA117	Land adjacent to Howletts	Disputing assessment outcome, but no additional evidence provided.	Following review of the landscape note and comments in the representation, the concerns around landscape and parking have been removed from the site conclusion.  The site remains unsuitable due to being isolated from day to day services and public transport.
SLAA200	Land South of Green Hills, Barham	Disputing assessment outcome, but no additional evidence provided.	Site remains unsuitable due to AONB and landscape concerns.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA126	Land North of Popes Lane, Sturry	Want the site to be allocated for commercial instead of residential.	No change to assessment. The site developer of draft allocation R9 (SLAA011) has agreed to work with the parish council to help meet their needs.
SLAA129	Hoplands East	Would like to see the site reallocated as a residential site rather than a commercial site.	No change to assessment. The site has an extant permission for employment space as part of wider mixed use permission.
SLAA131	Land to north of the Care Home, Former Herne Bay Golf Course	Would like to see the site reallocated as a residential mixed-use site rather than offices.	No change to suitability. The site has an extant permission for employment space as part of wider mixed use permission.
SLAA133	Former Herne Bay Golf Course - Land at the North Eastern Corner, Braid Drive	Would like to see the site reallocated as a residential mixed-use site rather than a public house.	No change to suitability. The site has an extant permission for employment space as part of wider mixed use permission.
SLAA136	Swale Reach	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to access concerns, and the site being isolated from day to day services and public transport.
SLAA137 A	Cockering Farm, Thanington	Would like to see the site reallocated as a mixed use site rather than a commercial site.	No change to assessment. The site has an extant permission for employment space as part of wider mixed use permission.
SLAA138	Adisham Court Farm	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to being below the minimum size requirement.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA140	Land to the east of Wraik Hill	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to access concerns, and the site being isolated from day to day services and public transport.
SLAA142	Land at Bossington Road	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to access concerns and half being in a conservation area. The area not in the conservation area falls below the minimum site threshold.
SLAA143	Land at Drill Lane	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and heritage concerns.
SLAA144	Old Park Training Ground	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and ecology concerns, specifically relating to the SSSI.
SLAA148	Hall Place	Disputing assessment outcome, but no additional evidence provided	Column AO on Heritage and column AP on Townscape/Landscape have been amended following comments from the representation. In column AO, erroneous wording has been removed as it is not considered that the site can mitigate heritage impacts sufficiently as it is located fully in a conservation area. In column AP, more detailed text has been added explaining why landscape issues are a concern.  The site remains unsuitable due to concerns around the conservation area and landscape, and the site being isolated from day to day services and public transport.
SLAA150	Land at School Lane Paddock, Bekesbourne	Disputing assessment outcome, but no additional evidence provided.	N/A - the site has been withdrawn from the SLAA.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA159	Milton Manor Farm	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and heritage concerns.
SLAA169	Land to the south of The Street, Barham	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to AONB, conservation area and heritage concerns.
SLAA176	Land at Whitstable Road	Disputing assessment outcome, additional comments detailing how landscape harm would be minimised.	The site remains unsuitable due to landscape concerns.
SLAA199	Land to the south of Church Lane, Barham	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to AONB, conservation area and access concerns.
SLAA203	Land to the south of Railway Hill, Barham	Disputing assessment outcome on grounds of heritage and landscape, but no additional evidence provided.	Officers checked the heritage designations map and confirmed that the site is located adjacent to a conservation area as identified in the original assessment, therefore the site remains unsuitable due to heritage concerns. The site also remains unsuitable due to AONB and landscape concerns.
SLAA204	Land to the east of Crookenden Place, Barham	Disputing assessment outcome on grounds of heritage and landscape, but no additional evidence provided.	Officers checked the heritage designations map and confirmed that the site is located adjacent to a conservation area as identified in the original assessment, therefore the site remains unsuitable due to heritage concerns. The site also remains unsuitable due to AONB and landscape concerns.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA217	Land adjacent A2 Patrixbourne Road	Disputing assessment outcome, based upon the site being allocated in the draft Bridge Neighbourhood Plan.	The site remains unsuitable due to being located in the Green Gap. As the Bridge Neighbourhood Plan has not been adopted, it does not currently carry significant weight when considering a site's suitability for allocation.
SLAA221	Land to the south of Goose Farm	Would like to add a parcel of land to the south of the R24 draft allocation for commercial use.	The site was assessed as a new submission under SLAA313.
SLAA224	Church Lane, Barham	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to AONB, conservation area and access concerns.
SLAA230	Land adjacent to 30 Churchwood Close, Rough Common	Disputing assessment outcome, additional evidence provided in the form of a landscape and visual overview document	The submitted landscape assessment was reviewed but the original conclusion remains. The site is considered unsuitable as development would be out of character with the built form of Rough Common.
SLAA246	Land at Dargate Road, Yorkletts	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape concerns, and the site being isolated from day to day services and public transport.
SLAA260	Land lying on the North West of Stodmarsh Road	Disputing assessment outcome, but no additional evidence provided.	The site remains unsuitable due to landscape and ecology concerns, access concerns, and the site being isolated from day to day services and public transport.

Site Ref	Site Name	Nature of Representation	Outcome Following Review
SLAA265	Land at Butlers Court Farm	Disputing assessment outcome, explanatory comments provided.	The site remains unsuitable due to access, landscape and ecology concerns, and the site being isolated from day to day services and public transport.
SLAA270	Bigbury Orchard	Comments and information to update the SLAA assessment provided.	Columns L and M on Planning History have been updated following comments from the landowner.  KCC have confirmed that Bigbury Road is not of a standard to accommodate a significant number of dwellings, there are no footways and the site is remote from any access to sustainable transport.  The site remains unsuitable due to access concerns, landscape, heritage and ecology concerns, and the site being isolated from day to day services and public transport.

## 4. Review of Available Sites

- 4.1. Following the close of the draft Local Plan Regulation 18 consultation (2022), 4 sites were reassessed as unavailable or having gained planning permission and therefore removed from the SLAA:
  - SLAA010 Land at Blean Common was granted planning permission for residential development (planning permission ref. CA/15/02523/OUT);
  - SLAA135 Land at Gorsefield and north of Giles Lane was granted planning permission for student accommodation (CA/20/02505);
  - SLAA150 Land at School Lane Paddock, Bekesbourne was withdrawn from the SLAA by the landowner; and
  - SLAA222 37 Kingsdown Park is no longer available.

# 5. Summary

- 5.1. 20 new submissions were made to the Call for Sites in the period July 2022 September 2023. The location and site boundaries for each of these sites submitted can be found on the Call for Sites map on the Canterbury City Council website. Following assessments of the site as per the methodology set out in the SLAA (2022), 7 sites were found to be suitable, available and achievable for development. An initial estimate of the development potential of these sites indicates the following:
  - The sites provide an additional potential land supply for the provision of approximately 2,035 dwellings.
  - The sites provide an additional potential land supply for the provision of approximately 2,600sqm of business, commercial or employment floorspace at standalone sites<sup>1</sup>.
- 5.2. The sites found to be suitable, available and achievable will be taken forward for further consideration for allocation in the new draft Local Plan. It is reiterated that these sites will not necessarily gain allocations. The findings of the SLAA will be used alongside the spatial strategy for the district and the wider evidence base, including public consultation, to determine which sites are appropriate for site allocations in the new Local Plan, as set out in the Development Topic Paper (2024).
- 5.3. Following a review of omission sites which received written representations in the draft Local Plan consultation (2022), 7 sites had their assessments amended due to updated information provided or errors identified in the previous assessment. No sites had their suitability status changed.
- 5.4. Until a Regulation 19 draft Local Plan is prepared, the council will continue to accept late submissions to the Call for Sites and further supporting information for those sites already submitted. Any additional sites and evidence will be assessed and reported in a subsequent update to the SLAA.

18

<sup>&</sup>lt;sup>1</sup> Excludes any business, commercial or employment floorspace that could be provided as part of mixed use development sites.