

Draft Canterbury District  
Local Plan to 2045

# **STRATEGIC LAND AVAILABILITY ASSESSMENT (SLAA)**

(JULY 2022)

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# 1. Introduction

- 1.1. The new Canterbury District Local Plan will guide development in the district up to 2045, replacing the existing Local Plan 2017 once adopted. The Strategic Land Availability Assessment (SLAA) forms part of the comprehensive and robust evidence base prepared to support the new Local Plan.
- 1.2. The purpose of the SLAA is to identify a supply of land which is suitable, available and achievable for future housing and economic development. It follows the guidance of the National Planning Policy Framework (NPPF) which states that “strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment.”
- 1.3. The findings of the SLAA should be regarded as a tool to aid the Council in making decisions, alongside a wider evidence base, including public consultation, as to which sites are suitable for site allocations in the new Local Plan. If a site is deemed suitable, available and achievable by the SLAA, it will not necessarily be allocated in the Local Plan. The SLAA does not outweigh or alter any existing local policies or designations.

## 2. Methodology

- 2.1. This SLAA has been produced using the latest methodology set out in the National Planning Practice Guidance (PPG), as illustrated in Figure 2.1. Stages 1 and 2 of this flow chart are covered in this SLAA report. Stages 3, 4 and 5 will be covered in a further evidence paper.

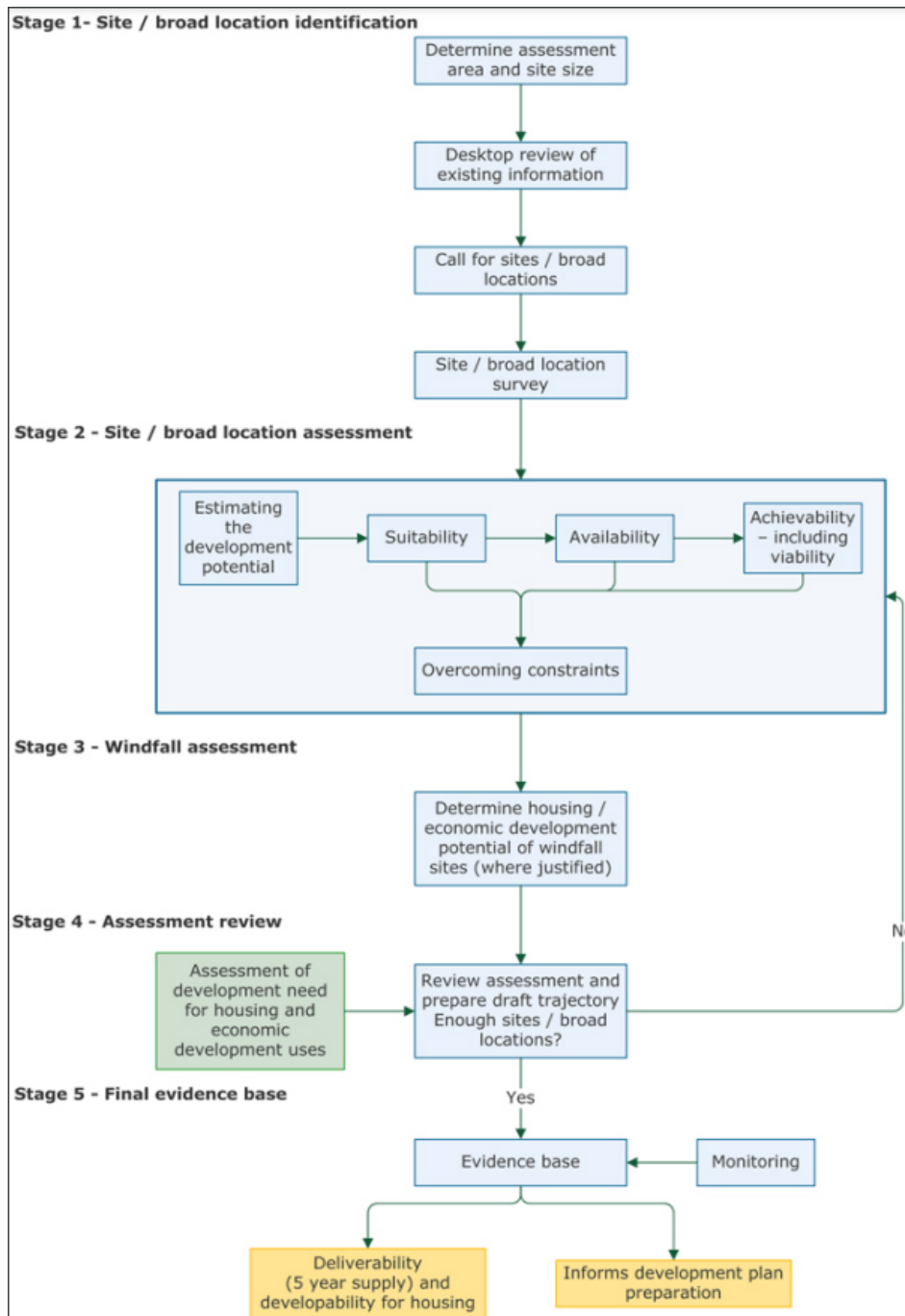


Figure 2.1 - SLAA Methodology Flow Chart. Source: PPG (2019)

<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

## Stage 1: Site Identification

### Assessment Area and Site Size

- 2.2. The assessment area is the administrative boundary of Canterbury City Council. The PPG advises on the scale of sites that should be considered in the assessment. Sites which fall below the minimums are unlikely to be considered for the Local Plan, however they can still be considered for development through the planning application process and would be regarded as ‘windfall development’. The minimum sizes are outlined in Table 2.1.

Table 2.1 - Minimum Site Size requirements

Type of Use Proposed	Minimum Size
Housing	0.18ha (0.07ha for sites suitable for flatted development)* or 5 dwellings
Commercial Development including employment, retail, leisure, tourism uses	0.25ha or 500m <sup>2</sup> of floorspace
Gypsy, Traveller and Travelling Showperson	1 pitch (1 mobile home & 1 touring caravan)
Community uses	No minimum
Open space/wildlife habitats	No minimum

\*Site area required for 5 dwellings, calculated on the basis of a 78% developable site area with a dwelling density of 35 per hectare for houses and 88% developable site area with a dwelling density of 80 per hectare for sites suitable for flatted development.

### Desktop Review

- 2.3. Following the adoption of the 2017 Local Plan, the local housing need methodology was introduced by the government. This resulted in a significant increase in housing need for the District and the need for additional development sites. A ‘Call for Sites’ was determined to be necessary, to help identify a wide range of sites and broad locations available for development.

### Call for Sites

- 2.4. The first Call for Sites ran from 7th February to 30th June 2020. A second Call for Sites ran from 12th May 2021 to 9th July 2021. Sites could be submitted for a variety of uses including:
- Housing (including affordable housing and specialist accommodation for students);
  - A variety of accommodation for older persons (including retirement properties/villages, care homes, extra care, sheltered housing);
  - A variety of accommodation for disabled and specialist needs housing;

- Self and custom-build housing (including community led housing and co-housing groups);
  - Gypsy, Traveller and Travelling Showpersons pitches (including transit and stopping places).
  - Economic development (including offices, storage, distribution centres, industrial uses, leisure, retail and tourism uses);
  - Community facilities and uses; and
  - Land for biodiversity habitats, open space and Local Green Spaces.
- 2.5. A targeted natural environment and renewable energy Call for Sites ran from 9th February 2022 to 11th March 2022, to identify further potential sites to help the district meet its climate change and ecological goals. The outcomes of this Call for Sites are discussed in the Natural Environment Topic Paper.
- 2.6. To maximise engagement and awareness of the Call for Sites, the Council notified statutory bodies, stakeholders, those listed on the Local Plan contact database and placed details on social media channels. Details were also published on the Council’s website and newsroom.
- 2.7. Following desktop review of the first Call for Sites submissions, it became apparent that there was likely to be limited choice for potential allocations. As part of the 2022 Call for Sites, a more proactive approach sought to identify additional opportunities, principally adjacent to submitted sites, to deliver as wide a range of sites and broad locations for consideration as possible
- 2.8. Late submissions were welcomed after the cut off dates and all sites submitted up to the end of February 2022 have been assessed as part of this report. Until a Regulation 19 Plan is prepared, the council will continue to accept late submissions. These will be assessed and reported in a later version of this report.

## **Stage 2: Site Assessment**

- 2.9. The methodology for assessing sites is shown in Figure 2.2. The assessment process was split into three steps: Step 1 - Initial consideration, Step 2 - Detailed consideration and Step 3 - Estimating Development Potential.
- 2.10. The Council consulted on a draft of the site assessment methodology. Revisions were following feedback resulting in the final methodology as set out below.

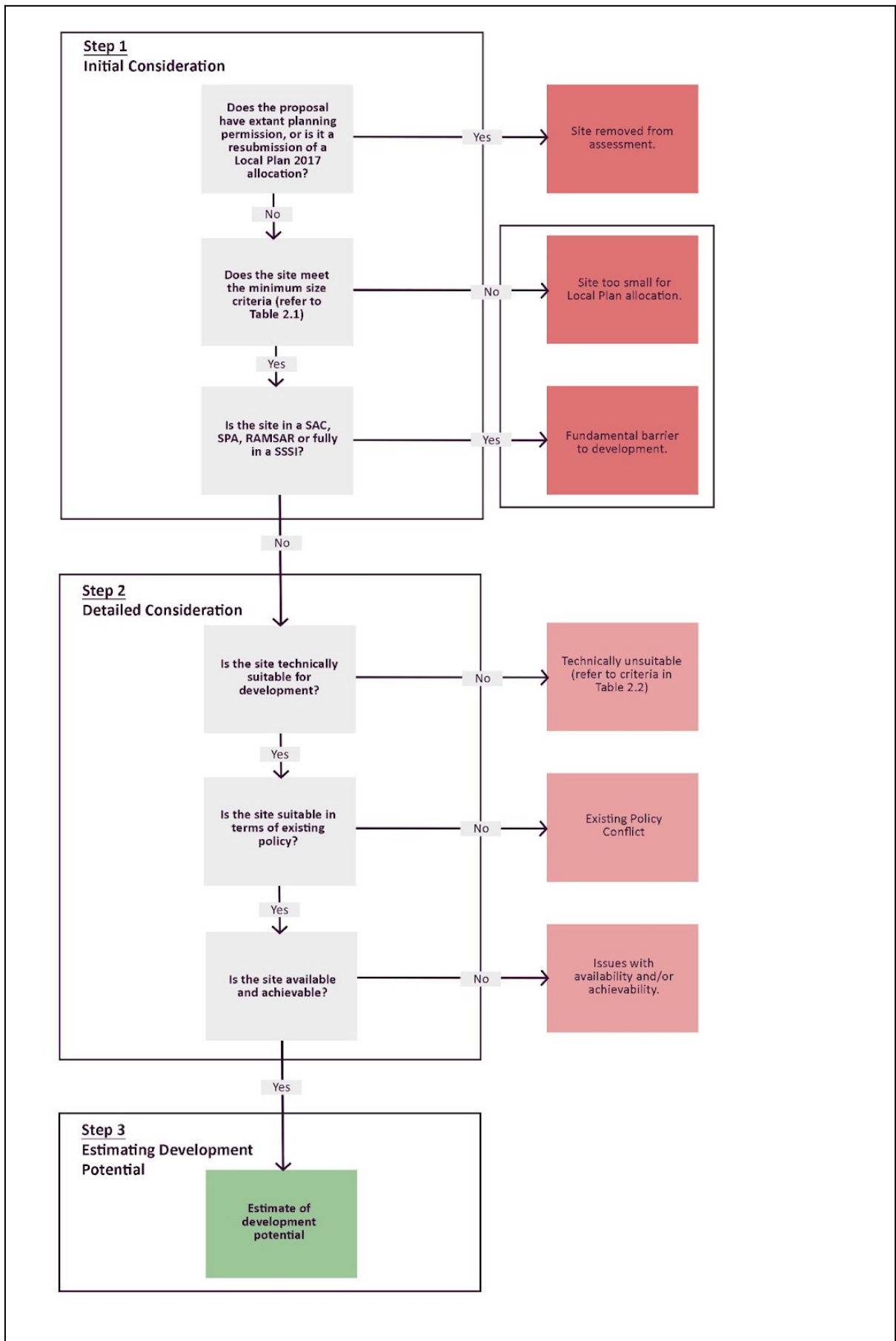


Figure 2.2 - Site Assessment Flow Chart.

## Step 1 - Initial Consideration

2.11. An initial sift of sites was undertaken to remove sites from the assessment process that were:

- Duplicate submissions. Where sites have been submitted with the same area, but for different land-uses (e.g. commercial and housing), or by a different applicant, these sites have been assessed separately.
- Withdrawn by the applicant or superseded by a later submission.
- Where the proposal has an extant planning permission.
- A resubmission of a Local Plan 2017 allocation. Note that where sites are partially covered by an existing allocation, propose a significantly different site area, or are proposing a change of use to an existing allocation, they have been taken forward to Step 2.
- Sites proposed for natural environment purposes. These are subject to a separate assessment process together with sites submitted as part of the natural environment and renewable energy Call for Sites.

2.12. An initial review of sites was then undertaken to eliminate sites that were:

- Too small to be allocated. These are sites which fall under the minimum size requirements as outlined in Table 2.1.
- Within RAMSAR, SAC, or SPA designations or fully located within a SSSI. These designations have been classified as fundamental barriers to a site being developed.

## Step 2 - Detailed Consideration

2.13. Sites that passed the criteria of Step 1 were then assessed in detail as to their suitability, existing policy constraints, availability and achievability. Sites have been classified as follows:

- Suitable - The site offers a suitable location for the development use proposed. Any identified constraints could be effectively mitigated.
- Unsuitable -
  - Site is technically unsuitable: The site does not offer a suitable location for development for the proposed use and/or there are constraints which cannot be mitigated; or
  - Site has a conflict with existing policy: the site offers a potentially suitable location for development for the use proposed, but is subject to a policy designation which currently resists development for the proposed use.



- Unavailable or unachievable - the site offers a potentially suitable location and is compatible with existing policy. However, based on the evidence received, the landowner(s) have not made the site available for the proposed development or development of the site is not considered achievable due major site constraints which impact its viability.

### Suitability

- 2.14. Planning officers undertook site visits of each submitted site, recording key features such as topography; notable views into and from the site; trees and landscape features; and notable built form, including heritage features.
- 2.15. Input from specialist heritage and urban design officers within the council as well as KCC Highways and KCC Ecology has also informed the assessment.
- 2.16. Where key constraints were identified, the council wrote to applicants to give them extra time to submit further information if they chose to do so, demonstrating that the constraints could be overcome.
- 2.17. The sites have been assessed on the basis of the criteria outlined in Table 2.2. Where other constraints have been identified these are listed in the individual site assessment.

*Table 2.2 - Suitability Criteria*

Constraint	Criteria
Environmental/ Ecological Designations	<ul style="list-style-type: none"> <li>● Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR), Area of Outstanding National Beauty (AONB), Ancient Woodland, Natural England Priority Habitat, Flood Zone 2 or 3.</li> <li>● Local Nature Reserve (LNR) or Local Wildlife Site (LWS);</li> <li>● Local Landscape Designation or Area of High Landscape Value;</li> <li>● Agricultural Land Classification;</li> <li>● Coastal Designations (Overtopping zone, Coastal Protection zone, Seasalter Shoreline Management Plan, Reculver Shoreline Management Plan);</li> <li>● Water Protection Area (Groundwater vulnerability or groundwater source protection zones);</li> <li>● Mineral Area;</li> <li>● Regionally Important Geological Site (RIGS);</li> <li>● Air Quality Management Area (AQMA);</li> <li>● Protected Species and</li> <li>● Tree Preservation Orders (TPO).</li> </ul> <p>It is important to note that the analysis of the various factors is dependent upon the scale of the development and the individual site context. For example, where only a section of the site is part of a designation this area could potentially be incorporated into the development layout.</p>
Site Location and Accessibility	<ul style="list-style-type: none"> <li>● Nearest settlement to the site and which rural cluster the site is part of (if applicable);</li> </ul>

Constraint	Criteria
	<ul style="list-style-type: none"> <li>Facilities within a 15 minute walk time;</li> <li>Facilities within a 15 minutes cycling time; and</li> <li>Facilities within a 5 minute drive.</li> </ul> <p>It has been assumed that development of a site over 16ha in size would provide new services and infrastructure to support the sustainability of the site (see Table 2.3).</p>
Highways Access/ Capacity Constraints	<ul style="list-style-type: none"> <li>Opportunity and suitability of providing access to the site.</li> <li>Known roads or junctions where highway capacity may be an issue and whether improvements would be needed.</li> <li>Public Rights of Way (PRoWs) across or in the vicinity of the site.</li> <li>Existing footways and cycle routes in the vicinity of the site.</li> </ul>
Heritage	<p>Potential impact on heritage assets including:</p> <ul style="list-style-type: none"> <li>World Heritage Site, and its buffer zone;</li> <li>Listed Buildings and Locally Listed Buildings;</li> <li>Scheduled Ancient Monuments;</li> <li>Area of Archaeological Importance or Archaeological potential; and</li> <li>Conservation Area.</li> </ul>
Townscape/ landscape	<ul style="list-style-type: none"> <li>Townscape</li> <li>Landscape impact, impacts on landscape views, notable features and screening of site; and</li> <li>Landscape Character Area.</li> </ul>
Utilities	<ul style="list-style-type: none"> <li>Water, Sewage, electric and gas supply.</li> <li>Presence of gas pipelines</li> <li>Presence of electricity pylons</li> </ul>
Contamination	<ul style="list-style-type: none"> <li>Existing contamination issues (identified through GIS analysis).</li> </ul>
Topography	<ul style="list-style-type: none"> <li>Topography of the site and whether it presents a constraint on the opportunity for development to take place.</li> </ul>
Neighbouring Land Uses	<ul style="list-style-type: none"> <li>Potential impact of development on the amenity of existing neighbours.</li> <li>Existing land-uses nearby that would be incompatible with the land use proposed (railway lines, Sewage treatment works etc.).</li> </ul>

2.19. Further evidence received after the initial Call for Sites submission has been taken into account and the site assessment updated accordingly. For those sites where additional site information was submitted that was considered to supersede the original submission information (for example, a revised site boundary), the most up to date information has been included. The cut-off date for additional information to be considered as part of the assessment was 29th July 2022.

### Policy Constraints

2.20. The PPG advises that assessing the suitability of sites or broad locations for development should be guided by the development plan, emerging plan policy and national policy. At the national level, the NPPF and PPG include a number of provisions, criteria and guidance on

matters, such as nature conservation, heritage and flood risk which have been considered as part of the technical suitability review. Where a site has been deemed to be technically suitable, it has then been assessed against the Canterbury District Local Plan (2017), as well as existing and emerging evidence documents including:

- Open Space Strategy (2014 - currently being updated);
- Playing Pitch Strategy and Needs Assessment (2020);
- Indoor Built Facilities Strategy and Needs Assessment (2020); and
- Rural Settlement Study (2020).

2.21. Where sites conflict with an existing policy based on the use proposed, they have been deemed as unsuitable. Existing policies will be reviewed through the new Local Plan. If a change in policy approach removes all policy conflict with a proposed site, they may be further considered for allocation, subject to availability and achievability. This is considered in the separate Development Topic Paper.

#### **Availability**

2.22. For a site to be available, the landowner/site promoter needs to have confirmed availability for development within the proposed Local Plan period and that there are no known legal issues or ownership problems.

2.23. The Call for Sites submission forms included detailed questions on the land ownership and the interest in the site of the person submitting it. Where there were still uncertainties, the applicant was contacted asking to provide additional evidence that the landowner was supportive of the proposals. In cases where the uncertainties have not been resolved the site has been classed as unavailable.

#### **Achievability**

2.24. Sites are considered as being achievable on the basis that there is a reasonable prospect of development coming forward at a particular point in time within the period of the Local Plan in line with PPG<sup>1</sup>. Achievability could be impacted by the costs associated with overcoming any site constraints to achieve development (such as contamination or presence of gas pipelines), which could impact the ability of the site to deliver policy obligations such as affordable housing.

### **Step 3 - Estimating Development Potential**

2.25. An estimate of the development potential of suitable, available and achievable sites, i.e. the number of dwellings or floor space that can be accommodated within a site, has been

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<sup>1</sup> PPG 020 Reference ID: 3-020-20190722.

undertaken to help understand the amount of land potentially available to meet the growth needs of the district.

- 2.26. For any sites taken forward for proposed allocations, further work beyond the SLAA will be undertaken to refine the potential development capacity. This will take full account of the context of each site and its opportunities and constraints, such as location, surrounding character and environment, and of infrastructure requirements to support development, along with consideration of how neighbouring sites could work together to deliver a wider development allocation.

### **Residential Development**

- 2.27. The parameters for calculating the potential yield of residential sites/ mixed-use sites with residential development are set out in Table 2.3. The capacity of a site has been based on the amount of the site which is developable and the dwelling density.
- 2.28. Smaller sites typically make use of existing infrastructure and the majority of the site can be developed. For larger sites, the total area of land available for development is reduced by the need to provide essential infrastructure, such as internal roads, open space, sustainable drainage infrastructure and landscaping. Very large sites will also need to incorporate significant on-site transport infrastructure or community and education facilities. The size of a site has therefore been used to determine the proportion that can be developed.
- 2.29. One of the main impacts on residential capacity for sites is the requirement for on-site open space. Reflecting the emerging policies for open space, these requirements have been factored into the calculation of “Developable Area” for sites, along with an allowance for very large sites to accommodate some non-residential uses in order to contribute to sustainable communities which is a key priority of the emerging local plan.
- 2.30. Centrally located sites have generally been assessed as flatted schemes, at 80 dwellings per hectare (dph), which reflects the SLAA methodology consultation, aligns with the emerging policies for making optimal use of land in highly sustainable locations and this is also reflected in the Viability Study. Within the urban areas and rural service centres 35 dwellings per hectare has been assumed, again following the SLAA methodology consultation, aligning with emerging policies for design and density and this is reflected in the Viability Study. However where the specific site locations or characteristics determine that a lower density is appropriate, 20 dwellings per hectare has been used to enable a more sensitive design approach to development.

Table 2.3 - Residential Development Parameters

Size of site	Developable Area	Average density (dph) <sup>[1]</sup>	Infrastructure Considerations
82ha +	52%	35	Sites of c.1500+ homes will likely require an onsite primary school (2.05ha), some non-residential uses (7% <sup>[3]</sup> of total site area) and all open space types to be provided on site.
16 - 81.9ha	54%	35	Sites of c.300 - 1499 homes will likely require some onsite non-residential uses (7% <sup>[3]</sup> of total site area), and all open space types to be provided on site.
7.5 - 15.9 ha	58%	35	Sites of this size are expected to provide all types of open space on site.
3.5 - 7.4 ha	60%	35	Sites of this size are expected to provide all types of open space on site, with the exception of allotments and outdoor sports (off site contributions would apply for outdoor sports)
Below 3.4ha	78%	35	Sites of this size are expected to provide amenity open space and Green Corridors on site (off site contributions would apply for Parks & Gardens, Fixed Play, Outdoor Sport and Semi Natural open space)
Any suitable urban site	88%	80 <sup>[2]</sup>	High density urban sites are expected to provide Green Corridors on site (off site contributions would apply for Parks & Gardens, Amenity OS, Fixed Play, Outdoor Sport and Semi Natural open space)

[1] unless site location/characteristics dictate an alternative density.

[2] Flatted development.

[3] Based on a review of current and proposed developments in Canterbury District.

- 2.31. The parameters set out in Table 2.3 are a high-level, broad set of assumptions generally more suited to estimating the development potential of greenfield sites. Brownfield sites, in particular urban brownfield sites, are more complex. Where appropriate, a bespoke yield has been calculated to determine development potential. Deductions have also been made to the amount of land available for development where appropriate, such as where a portion of the site may contain flood zone, or ancient woodland (where these aspects do not preclude development of the whole site). The methodology specific to each site is outlined in Column BV of the SLAA output table in Appendix B.

### Commercial Development

- 2.32. The Economic Development and Tourism Study (2022), sets out an estimate of land-take requirements for Office and Industrial/ Warehousing development. This information has been used to provide an estimate of the development potential for commercial sites. The figures take account of the total land/site area typically needed to accommodate commercial uses, factoring in requirements relating to premises, car parking, space for lorry turning, landscaping etc:

- Industrial and warehousing: a 1ha site would be needed to accommodate a footprint of 4,000sqm.
- Lower density office space: a 1ha site would be needed to accommodate a footprint of 4,000sqm.
- Higher density office space (urban/town centre locations): a 1ha site would be needed to accommodate a footprint of 20,000sqm.

2.33. As with the residential development sites, where appropriate, bespoke yields have been calculated to determine development potential, with deductions made to the amount of land available for development where there are specific site constraints. The methodology specific to each site is outlined in Column BV of the SLAA output table in Appendix B.

## 3. Outcomes

- 3.1. 305 submissions were made to the Call for Sites prior to the cut off date of February 2022<sup>2</sup>. The sites submitted are shown on a map in Appendix B.
- 3.2. At the initial consideration stage the sites were filtered from the assessment as follows:
  - 36 sites were submitted for natural environment purposes and are considered separately in the Natural Environment Topic Paper.
  - 11 sites were withdrawn by the applicants.
  - 7 sites were superseded by subsequent submissions, no assessment information is provided for these sites.
  - 5 sites were duplicates - only one submission for the same proposal has been assessed for each site.
  - 10 sites have existing allocations or planning permissions.
  - Two sites were classified as having fundamental constraints to development.
  - 13 sites were rejected on the basis of being too small for allocation in the Local Plan.
- 3.3. Following the filtering at the initial consideration stage, a total of 221 sites were taken forward to Step 2 for detailed consideration.
- 3.4. 148 sites were found to be unsuitable for the development proposed. For these sites a reason is given for this conclusion in Column BD of Appendix C, based upon outcomes from the site assessment process set out in the methodology in Section 2.
- 3.5. 22 sites were found to be technically suitable, however the development proposed conflicts with existing policy. For these sites, details of the policy conflict are given in Column BQ of Appendix C.
- 3.6. 4 sites were found to be suitable for development with no policy conflicts, however they have not been made available by the landowner for the development use proposed.
- 3.7. No sites were found to have significant issues with achievability.
- 3.8. A total of 47 sites were found to be suitable, available and achievable. 40 of these sites were proposed for residential use, or mixed use with residential. 7 of these sites were proposed for commercial land uses.

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<sup>2</sup> This excludes sites submitted to the separate Natural Environment and Renewable Energy Call for Sites.

3.9. The estimate of development potential for suitable sites is shown in Column BY in Appendix C. The assessment indicates the following:

- There is a potential land supply for the provision of approximately 10,982 dwellings.
- There is a potential land supply for the provision of approximately 23,720sqm of business, commercial, or employment floorspace at standalone sites<sup>3</sup>.

#### **Next Steps**

- 3.10. The sites found to be suitable, available and achievable will be taken forward for further consideration for allocation in the new Local Plan. It is reiterated that not all of these sites will necessarily gain allocations. The findings of the SLAA will be used alongside the spatial strategy for the district and a 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.
- 3.11. Until a Regulation 19 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 later version of the SLAA.

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<sup>3</sup> Excludes any business, commercial or employment floorspace that could be provided as part of mixed use development sites.



# Appendix A: Glossary of Terms

**Affordable Housing:** This is housing that is made available below the full market value for example shared ownership, affordable rent and social rent.

**AONB: Area of Outstanding Natural Beauty:** An area that has been designated to protect the land to conserve and enhance its natural beauty.

**AHLV - Area of High Landscape Value:** Areas of high landscape quality with strong distinctive characteristics which make them particularly sensitive to development.

**AQMA - Air Quality Management Area:** An area where air pollution levels have exceeded the national air quality objectives.

**Brownfield land:** Land that has previously been developed.

**CA - Conservation Area:** An area of notable environmental or historical interest or importance which is protected by law against undesirable changes.

**Constraints:** Designations and/or policies that restrict the development potential of a site.

**Deliverability:** The economic viability of sites and whether or not there is a reasonable prospect of a site being developed within the plan period up to 2031.

**Density:** The number of dwellings per hectare. This is applied to calculate the development potential.

**Flood Risk:** The probability of an area being susceptible to flooding from all sources including rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals, lakes and other artificial sources.

**Greenfield land:** Land that has not previously been built on, with the exception of agricultural buildings.

**Infrastructure:** This includes roads and other transport facilities, flood defences, schools and educational facilities, medical facilities, sporting and recreational facilities, open spaces which are needed to support and serve communities living in developments.

**NE - Natural England:** The Government's adviser for the natural environment in England.

**NNR - National Nature Reserve:** An area that has been identified as a key place for wildlife and/or natural features, established to protect the most significant areas of habitat and/or geological formations.

**NPPF - National Planning Policy Framework:** This sets out the Government's planning policies for England and how these are expected to be applied, providing the wider context for the Local Plan.

**PPG - Planning Practise Guidance:** This sets out the Government's planning policies for England and how these are expected to be applied.

**PROW - Public Right of Way:** Rights across land exercisable by the public, and which allow them to pass along them at any time they choose. Some rights of way also allow travel by other means, e.g. by horse, bicycle or car.

**SAC - Special Area of Conservation:** An area that has been designated for the conservation of natural habitats and species.

**SLAA - Strategic Land Availability Assessment:** This identifies a potential future supply of land which is suitable, available and achievable for housing and economic development over the plan period.

**SPA - Special Protection Area:** An area designated under the EU Birds Directive to protect rare, vulnerable and migratory birds.

**SSSI - Site of Special Scientific Interest:** An area that has been designated for conservation due to the rare species it contains, or important geological or physiological features that lie in its boundaries.


**TPO - Tree Protection Order:** This refers to the protection of a specific tree or woodland from deliberate damage or destruction.

**Viability:** This refers to the economic costs of delivering development and whether or not there is a reasonable prospect of development taking place on a site within the plan period.

**Appendix B: [Interactive Map - Submitted Sites](#)**

# Appendix C: Site Assessments

The detailed assessments for the call for sites submissions are available in this spreadsheet:

 SLAA Appendix C - Site Assessments (July 2022).xlsx