

Draft Canterbury District  
Local Plan to 2045

# **DEVELOPMENT TOPIC PAPER**

(OCTOBER 2022)



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# 1. Introduction

- 1.1. This topic paper sets out the background to the council's approach to development in the Canterbury District Local Plan (2020-2045); drawing on key evidence such as the Housing Need Assessment (2021), the Economic Development and Tourism Study (2020, 2022) and the Retail and Leisure Study (2020, 2022).
- 1.2. This paper also explains the justification for the spatial growth strategy selected for the draft Local Plan, as well as the sites selected for proposed allocations.
- 1.3. This paper also details the council's proposed approach to a range of specialist housing needs, such as for:
  - affordable housing
  - student accommodation (including the proposed approach to Houses in Multiple Occupation (HMOs))
  - older persons' accommodation
  - people with disabilities
  - people who rent
  - families with children
  - key workers
  - accommodation needs of gypsy and travellers
  - self-build
  - service families
- 1.4. The policies in the draft Local Plan have been prepared in line with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). They have been informed by a number of evidence base documents which will be identified where appropriate.

## 2. Development needs

### Housing Market Area

- 2.1. Although Housing Market Areas (HMA) are no longer required under the NPPF as the basis for determining what was previously known as “objectively assessed housing needs” (having been replaced by the newer “standard methodology”), they still provide an useful understanding of the geography and the economic and migration factors of the local housing market. The Canterbury District Strategic Housing Market Assessment 2018 (SHMA) provides information on our HMA.
- 2.2. The 2018 SHMA states that there are strong migration links between the Canterbury district, Dover and Thanet. However, there are clear price differences between Canterbury and Margate and Ramsgate and Dover town which suggests that Canterbury’s HMA does not extend as far as the coastal towns.
- 2.3. A conclusion was reached which stipulates that a Canterbury focused HMA only covers parts of Thanet and parts of Dover (which also does not contain the district’s main settlements).
- 2.4. Engagement with neighbouring authorities and the production of statements of common ground demonstrate an agreement that each Local Planning Authority will meet its own housing requirements within its own administrative boundary. This helps to demonstrate that surrounding authorities can and will aim to meet their own housing needs, allowing Canterbury to be considered as a self-contained HMA for the purpose of preparing the draft Local Plan.
- 2.5. London is not considered part of the Canterbury HMA. Engagement is ongoing through the Kent Planning Policy Forum on the London Plan and associated issues, and a representative from the Greater London Authority attends the meeting as required. These discussions are county wide and no housing figure has been identified for the Canterbury district.

### Local Housing Need

- 2.6. The revised NPPF (2021) includes new policies on how local plans are expected to deliver a sufficient supply of homes.
- 2.7. In order to identify the number of homes needed, the NPPF states that a standard methodology to calculate the Local Housing Need (LHN) should be used. This new standard methodology is set out in the PPG on housing and economic needs assessment.

- 2.8. The Housing Need Assessment (HNA) 2021<sup>1</sup> was produced based on the standard methodology and in line with national guidance. This identified a need of **1,120** homes per year, creating a total need of **22,400** new homes over the Local Plan period of 2020-2040.
- 2.9. The draft district vision and Local Plan options consultation 2021 contained different scenarios in terms of housing need. There were 6 options with different spatial distributions. However, they all either aimed to meet the LHN or provide an additional 6,000 - 9,000 homes.
- 2.10. Based on responses from the options consultation, the spatial growth strategy and decision to extend the draft Local Plan to cover 2020-2045, it is proposed that we aim to meet our housing needs as set by the government. This therefore negates the option for an additional 6,000-9,000 homes.
- 2.11. In March 2022, revised affordability ratios were published. Canterbury district's local affordability ratio changed from 11.19 to 12.86.
- 2.12. The capped LHN remains at 1,120 homes per year. However, the 40% cap can only be applied where the Local Plan policies are less than five years old and even then may require early review<sup>2</sup>. The adopted Local Plan became five years old on 17 July 2022 so no cap is being proposed.
- 2.13. The LHN figure identified is currently 1,252 homes per year, creating a need for a total of 31,300 new homes over the Local Plan period of 2020-2045 (see Table 2.1).

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<sup>1</sup> A Housing Need Assessment was published as part of the Draft district vision and Local Plan options consultation in March 2021. Shortly after, the government introduced First Homes, so a revised version was produced and published in September 2021. This September 2021 document is the version used throughout this document and informs the draft Local Plan.

<sup>2</sup> Housing and economic needs assessment PPG (step 3 and paragraph 007)

Table 2.1: Local Housing Need calculation

Steps	Result
Step 1: Household Growth <sup>3</sup>	806 (per year)
Step 2: Affordability adjustment factor  Local affordability ratio: 12.86  $\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$	1.55375
<b>Canterbury LHN</b>  = Household growth x affordability adjustment factor	<b>1,252</b>
Step 3: Cap and Step 4: Cities and urban centres uplift	N/A

- 2.14. The PPG<sup>4</sup> clearly identifies that any deviation from the standard method must be supported with robust justification and only used in exceptional circumstances. There is currently no robust evidence to justify an alternative methodology. The level of growth required under the standard methodology will help facilitate affordable housing, infrastructure and employment growth.
- 2.15. The housing need over the draft Local Plan period is set out in **Policy SS3 - Development Strategy for the district.**

## Employment needs

- 2.16. The Economic Development and Tourism Study (2022) identified two growth scenarios: Labour demand and Labour supply<sup>5</sup>.

Table 2.2: Labour demand and Labour supply employment need scenarios.

Use	Labour demand (GEA sqm)	Labour supply (GEA sqm)
Office E(g)(i)/(ii)	38,480	18,180
Light Industrial E(g)(iii)	52,030	24,645
General Industrial (B2)	15,270	7,215
Storage and Distribution (B8)	66,440	31,370
<b>Total</b>	<b>172,220</b>	<b>81,410</b>

<sup>3</sup> Based on MHCLG's 2014-based household projections (see Chapter 2 of the Housing Needs Assessment 2021)

<sup>4</sup> Housing and economic needs assessment PPG (paragraph 003)

<sup>5</sup> Canterbury EDTS Focused Update Final Report, p.3

- 2.17. The labour demand scenario is based on Experian’s economic forecast and considers the effects of Covid-19. On the other hand, the labour supply scenario is based on population projections only. Therefore, the labour demand scenario has been used to identify the need for employment land in the district.
- 2.18. Being the higher of the two, the Labour demand scenario will encourage employment related development in the district which will provide options and flexibility in the market without over saturating it, in line with NPPF policies. It will also support further jobs, thus improving the district’s economy which is a clear priority for the draft Local Plan.
- 2.19. The employment need over the draft Local Plan period is set out in ***Policy SS3 - Development Strategy for the district.***

## Retail needs

- 2.20. The Retail and Leisure Study Update (May 2022) states, ‘The long term projections to 2045 should be treated with caution due to the inherent uncertainties described earlier. The priority for the emerging Local Plan should seek to accommodate retail floorspace projections over a 10 year period or up to 2035<sup>6</sup>.’ This is consistent with the NPPF which urges caution over longer term projections for retail needs.

*Table 2.3: Retail need forecasts for Canterbury District (sqm net) (cumulative)<sup>7</sup>*

	2025	2030	2035	2040	2045
Convenience goods	-1,555	-623	414	1,383	2,517
Comparison goods	-360	2,707	5,290	8,688	13,295

- 2.21. As a 10 year period from the start of the Local Plan would be until 2030, the retail needs until 2035 have been used for the purposes of the development strategy. This will mean that the draft Local Plan will still plan for the minimum 10 years from the anticipated adoption date of 2024.
- 2.22. The retail need over the draft Local Plan period is set out in ***Policy SS3 - Development Strategy for the district.***

<sup>6</sup> Paragraph 2.42

<sup>7</sup> Based on tables 2.2 and 2.3

### 3. Spatial Growth Strategy for the District

- 3.1. To develop the new Local Plan, the council ran an ‘issues’ consultation in 2020 and a ‘Draft district vision and Local Plan options’ consultation in 2021. The proposed spatial strategy is informed by responses to these consultations in addition to other key evidence, including the Strategic Land Availability Assessment (SLAA).
- 3.2. Six spatial growth options were consulted on at the ‘options’ consultation stage:
  - **Preferred growth option, Canterbury focus A, Canterbury focus B** - these three options involved growth focused on Canterbury with more limited growth at the coast and villages.
  - **Coastal focus** - growth focused in Whitstable and Herne Bay with more limited development in Canterbury.
  - **Rural focus** - growth focused in sustainable rural areas, with some growth at villages and hamlets, and more limited growth at Canterbury, Whitstable and Herne Bay
  - **New freestanding settlement** - growth focused at a new freestanding settlement, with more limited growth in Canterbury, Whitstable and Herne Bay and rural areas
- 3.3. These were “theoretical” or “extreme” growth scenarios, not informed by land availability, to ascertain the public’s priorities for the spatial distribution of growth. It was always clear that additional evidence, such as land availability, would need to be considered as the council developed its preferred growth strategy.
- 3.4. The consultation responses showed growth focused in Canterbury to be preferred, followed by growth focused at the coast and the new freestanding settlement option.
- 3.5. Following an initial assessment of the submissions from the first call for sites, which was completed in spring 2021, it was considered that there were insufficient suitable sites in Canterbury to meet the district’s housing needs in this area alone. Similarly, there were insufficient suitable sites at the coast to meet the district’s housing needs, and very limited land availability in the rural areas.
- 3.6. Even when combining the suitable sites at Canterbury, those at the coast and a modest supply from sites at the most sustainable rural settlements, there was still a very significant shortfall in supply against the total housing needs of the district.
- 3.7. The second call for sites was launched in May 2021, in an effort to identify additional sites to meet the housing needs. As part of the second round of the Call for Sites, the council also undertook a process to proactively contact owners of land adjacent to large sites assessed as



suitable in the first round of assessment. Additionally, as the creation of a new freestanding settlement received positive feedback at the options consultation, the council contacted landowners to ascertain potential availability following a high level review of potential locations for a new freestanding settlement, taking into account major constraints such as environmental and heritage designations. Possible locations were identified to the south-west of Yorkletts, north of Bekesbourne, west of Aylesham and east of Blean.

- 3.8. The second call for sites received fewer submissions than the first, and these were also assessed against the SLAA methodology. Additional suitable sites were identified in Canterbury, and also at the coast including some extensions to large suitable sites (as set out in Chapter 4 and Appendix B). However, while these additional sites helped to close the gap, there was still a very significant shortfall in supply against the total housing needs of the district.
- 3.9. In terms of the potential new freestanding settlements, no sites were submitted to the south-west of Yorkletts and only one site was to the north of Bekesbourne which was of insufficient size to support a freestanding settlement. These two locations were not reasonable alternatives.
- 3.10. West of Aylesham was submitted under SLAA262, SLAA267 and SLAA268, and east of Blean was submitted under SLAA264. These are reviewed in Chapter 4 and Appendix B.
- 3.11. To summarise, land east of Blean<sup>8</sup> was not considered suitable or appropriate for a free standing settlement due to its close proximity to the Blean Woods which has the potential to adversely impact the designated sites including Blean Complex SAC, Church Woods, Blean SSSI and Blean Woods NNR, the site includes West Blean & Thornden Woods SSSI and, moreover, there was no clear access strategy. Therefore, this site was not progressed.
- 3.12. The land submitted west of Aylesham was considered to be of a sufficient size, when combined, to provide an opportunity for a new freestanding settlement in the district, and to address, in large part, the identified shortfall in supply against the district's housing needs.
- 3.13. Through these processes, and informed predominantly by the consultation responses and by land availability, a blend of growth options is therefore proposed including a focus on Canterbury, expansion at Whitstable, a new freestanding settlement, and limited expansion at the most sustainable rural settlements.
- 3.14. The NPPF (Paragraph 79), states that 'to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural

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<sup>8</sup> SLAA264 was considered alongside SLAA158C and SLAA158D

communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.’ A balance must be achieved however, between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside. To support the development of the Local Plan, the Rural Settlement Study (2020) was undertaken to identify the level of services and facilities available in settlements outside the city of Canterbury and the coastal towns of Whitstable and Herne Bay.

- 3.15. Sturry, Blean, Bridge, Chartham, Hersden and Littlebourne are identified as Rural Service Centres. These are highly sustainable villages where residents can meet most of their day-to-day needs within the settlement itself. These ‘Rural Service Centres’ provide access to key services such as primary schools, nurseries/pre-schools, GP surgeries, community halls and convenience stores; and serve both residents within the settlement and in nearby smaller rural settlements. Rural Service Centres therefore play a critical role in supporting our rural communities and are suitable for a scale of growth that supports their function.
- 3.16. Adisham, Barham, Broad Oak, Harbledown, Hoath, Lower Hardres, Petham, Rough Common, Stuppington, Westbere and Wickhambreaux are identified as Local Service Centres. These settlements provide a more limited range of services and facilities compared to rural service centres, however are still considered to be relatively sustainable in the wider context of the district. Many of these settlements have their own primary schools and shops, and will also serve residents in nearby smaller rural settlements. Local Service Centres therefore play an important role in supporting our rural communities and are suitable for a limited scale of growth that supports their function.
- 3.17. Rural settlements in the district classified as Villages or Hamlets have either no services or very limited services and are generally considered to be unsustainable locations for new housing development. All parts of the district outside of settlement boundaries of the Urban Areas, Rural Service Centres and Local Service Centres are therefore defined as countryside, where priority will be given to protecting the rural character of the district. Within the countryside the spatial strategy seeks to support agricultural development, including viticulture, and enable the protection and sensitive enhancement of existing community facilities and businesses to support the district’s rural economy.
- 3.18. In summary, the proposed spatial growth strategy comprises of:
  - Canterbury Urban Area as the principal focus for development in the district.
  - Whitstable and Herne Bay Urban Areas as the secondary focus, where development will be principally driven by the need for new infrastructure including schools and improved transport connectivity.
  - A new freestanding community will be pursued to meet a proportion of growth.

- Proportionate development will be allocated at all Rural Service Centre at a suitable scale which supports the function and character of the settlement.
- A limited amount of growth will be allocated at Local Service Centres, where suitable sites are available, at a suitable scale which supports the function of the settlement.
- No residential development will be allocated in the countryside.

3.19. Details of the strategy for employment and retail allocations are provided in Chapters 7 and 8 respectively.

## 4. Site Selection

### Appraisal of Sites and Site Selection Process

- 4.1. The SLAA identifies a supply of sites in the district which are suitable, available and achievable for development over the Local Plan period. Of the 305 sites submitted, the SLAA identified 47 sites as suitable, available and achievable for the development use proposed, with any identified constraints likely to be effectively mitigated.
- 4.2. As part of the Sustainability Appraisal of the draft Local Plan site specific Sustainability Appraisal assessments were carried out on all SLAA sites that passed Step 1: Initial Consideration of the SLAA process and were reviewed as part of Step 2: Detailed Consideration. Each site was appraised using the detailed assessment criteria and associated assumptions set out in the Sustainability Appraisal (SA)<sup>9</sup>.
- 4.3. The findings of the SLAA and site specific SA are summarised for each site in Appendix B. Of the sites proposed for allocation, no sites were identified in the SA to have fundamental constraints and there is considered to be sufficient scope to mitigate the significant adverse effects identified through the SA. The site allocation policies set out a number of key considerations for each site including: design and layout; landscape and green infrastructure; and access and transportation to address these issues.
- 4.4. In determining the sites to be proposed as allocations in the draft Local Plan the council has considered the following:
  - The spatial strategy for the district and the district settlement hierarchy;
  - The SLAA and SA outcomes;
  - Other Local Plan evidence such as transport modelling, economic needs assessments and housing needs assessments.
- 4.5. In order to maximise the potential of previously developed land, all brownfield sites identified in the SLAA as suitable, available and achievable are proposed for allocations or as broad locations/ opportunity areas for development. In areas where the council is seeking to allocate a limited amount of development, priority has been given to brownfield sites.

### Proposed Sites

- 4.6. The Local Plan proposes to allocate land to deliver 12,458 homes plus 1,039 older persons accommodation, and the council's economic growth strategy over the Local Plan period. The

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<sup>9</sup> see Sustainability Appraisal Report

strategy for each settlement in the district is outlined below. Further site specific details regarding the reasoning for site selection are provided in the summary SLAA and SA result table in Appendix B.

- 4.7. The SLAA set out the methodology for calculating development potential and includes an estimated yield for all suitable, available and achievable sites. The parameters used to determine the allocation quantum for residential development are set out in Table 4.1.

*Table 4.1 - Residential Development Parameters*

Size of site	Developable Area	Average density (dph) <sup>[1]</sup>	Infrastructure Considerations
16ha+	54%	35	Policy DS24 requires sites over 7.5ha to provide all types of open space on site. Sites of c.300+ homes will typically require some onsite non-residential uses (7% <sup>[3]</sup> of total site area).
7.5 - 15.9 ha	58%	35	Policy DS24 requires sites over 7.5ha to provide all types of open space on site.
3.5 - 7.4 ha	60%	35	Policy DS24 requires sites of this size to provide all types of open space on site, with the exception of allotments and outdoor sports (for which off site contributions will be required).
Below 3.4ha	78%	35	Policy DS24 requires sites below 3.4ha to provide green corridors on site. For lower density sites, amenity green space is also expected to be provided within the site. (Off site contributions apply for parks & gardens, fixed play, outdoor sport and semi natural open space)
Any suitable urban site	88%	80 <sup>[2]</sup>	Policy DS24 requires sites below 3.4ha to provide green corridors on site. ( Off site contributions apply for amenity open space, parks & gardens, fixed play, outdoor sport and semi natural open space)

[1] In accordance with Policy DS6. Alternative densities have been proposed where appropriate based on a site's location/ characteristics.

[2] Flatted development.

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

- 4.8. In developing the draft Local Plan, the council has had to have regard to key infrastructure requirements, such as for schools and transportation, and the infrastructure requirements for each site. In addition to any allowances attributed through the SLAA, such as for open space, specific deductions have therefore been made to the developable area of a site where supporting infrastructure is required, for example for a new primary school. The Draft Infrastructure Delivery Plan (2022), sets out the justification for infrastructure provision across the proposed sites.
- 4.9. Policy DS2 requires sites over 300 dwellings to provide a minimum of 10% of older persons accommodation. In calculating the yield for a site, this has been assumed to be in addition to, rather than a percentage of the dwellings proposed. The older person's accommodation

is to be located alongside proposed community facilities, as discussed in Chapter 6, and is accounted for in the 7% of site area allowed for other land uses.

- 4.10. Where sites have existing community, commercial and leisure uses on the site, the quantum of existing floor space is to be retained.
- 4.11. The SLAA considered each site individually. Further consideration has been given to how neighbouring sites could work together to deliver development and some sites have been combined to form a single allocation.
- 4.12. The specific calculations for each site are provided in Appendix B. For reference, a note has been included for each site, detailing where a site yield is the same as the SLAA assessment, has been changed, or if it was not considered as part of the SLAA as the site was not then identified as suitable, available and achievable.
- 4.13. Existing Local Plan 2017 allocations are to be carried forward unless a site has been shown to be no longer available, or where changes are proposed and the existing policy is to be replaced in the new Local Plan. The rationale for any changes are discussed in the strategies for each settlement below, and further details are provided in Appendix B.

### **Canterbury**

Canterbury is the major focus for development in the new Local Plan. Two new strategic development areas will extend the urban area to the east and the south west of the city and provide the majority of growth in the city together with significant infrastructure opportunities. All other sites identified in the SLAA as suitable, available and achievable are proposed as allocations or are identified as part of opportunity areas for regeneration over the Local Plan period.

- 4.14. SLAA151, SLAA259, SLAA090, SLAA137B and SLAA128 are identified as suitable in the SLAA and are allocated as part of a strategic development area in South-West Canterbury.
- 4.15. SLAA122 is identified as suitable in the SLAA and although SLAA105 and SLAA266 were identified as unsuitable in isolation due to accessibility issues and accessibility and landscape concerns respectively, together these sites present an opportunity for the creation of a new community. They are allocated as part of a new strategic development area in East Canterbury.
- 4.16. These two strategic development areas will consolidate growth on the southern side of the city, to build on and integrate with planned growth at the 2017 strategic sites at South Canterbury and Cockerling Farm. The allocation of these sites will also unlock opportunities

to deliver significant infrastructure investment, including an Eastern Movement Corridor and a South West Canterbury Link Road, with direct access to the potential new Kent and Canterbury Hospital in SLAA151. This key infrastructure will facilitate the implementation of the Canterbury Circulation Plan which will significantly reduce traffic in existing neighbourhoods, enabling 'shared streets' and supporting more active and sustainable travel.

- 4.17. SLAA183 is also proposed to be allocated as part of the East Canterbury strategic development area. It is identified as unsuitable in the SLAA as the majority of the site consists of priority habitat. However the site has a well established use as a driving range and it is considered that the impacts of a modest amount of residential development on the remaining priority habitat could be mitigated. The development of the site would also allow for the enhancement of existing sport facilities.
- 4.18. All sites other sites in Canterbury identified in the SLAA as suitable, available and achievable are proposed as allocations (SLAA099, SLAA102, SLAA156, SLAA162, SLAA239, 056), with 5 of these 6 of these being Brownfield.
- 4.19. SLAA192 is identified as suitable in the SLAA, however given the prominent city centre location of the site, the Council considers there is potential for the site to be developed as part of a wider regeneration of the area. The site has therefore been identified as an opportunity area for regeneration during the Local Plan period. A number of other opportunity areas have also been identified in the city centre and Canterbury urban area as set out in Policies C3 and C25.
- 4.20. SLAA065 and SLAA181, while identified as suitable in the SLAA, have not been proposed as specific allocations, but are included under Policy C23 Wincheap Commercial Area, which is identified as a broad location for mixed use development over the period of the Local Plan. The council will work with stakeholders to prepare an SPD to facilitate a coordinated regeneration of the area.
- 4.21. A section of SLAA079 Longport Car Park, adjacent to Ivy Lane, has an existing allocation in the 2017 Local Plan; this allocation is retained. The submitted site boundary included the wider Longport Car Park, however although identified as suitable in the SLAA, it is not available for development.
- 4.22. SLAA158B, 158C, 158D, 158E and 158F are identified as unsuitable in the SLAA. These sites all form part of The University of Kent's landholdings to the north of Canterbury and may present an opportunity in the longer term to deliver improved highway connectivity to the north of the city and facilitate the potential completion of an outer ring-road to complement the Canterbury Circulation Plan. The sites have therefore been identified in Policy C26 for

further consideration over the Local Plan period to help facilitate the delivery of strategic highway infrastructure with the appropriate mitigation of constraints identified in the SLAA.

- 4.23. SLAA155 Canterbury Business Park is allocated for B8 use and a viticulture hub. The site is located adjacent to the existing Canterbury Business Park and was considered unsuitable in the SLAA due its location in the AONB and Highland Court conservation area. The economic needs assessment has identified a significant unmet need for B8 floorspace in the district. The Council however, has been unable to identify any suitable alternative locations outside of the AONB. Despite the landscape and heritage constraints, the existing business park is well established and has strong benefits associated with the delivery of B8 uses, such as its close proximity to the SRN. It has therefore been proposed for allocation. It is critical however, that the site is developed with a sensitive and landscape-led design approach to minimise and mitigate any adverse impacts.
- 4.24. The majority of existing 2017 Local Plan allocations in Canterbury are to be carried forward. Site 10 (Policy SP3) Ridlands Farm, is replaced by site allocation C6 (SLAA151 and SLAA128), forming part of the South West Canterbury strategic development area; site CA503 (Policy HD1) BT Car Park, is replaced by site allocation C17 (SLAA239), will allow for the redevelopment of a wider area; and site CA482 Canterbury East Station is replaced by site allocation C18 which combines the 2017 allocation with SLAA156.
- 4.25. Existing 2017 Local Plan allocations at Holmans Meadow Car Park (Policy HD1, Site CA477), and Rosemary Lane Car Park (Policy HD1, Site CA043B), are carried forward and are also identified as opportunity areas as it is considered that both sites could provide more housing than their current allocation.
- 4.26. White Horse Lane (Policy HD1 site CA488), is no longer proposed for allocation as the landowner has confirmed that there is no intention to develop the site.
- 4.27. In the 2017 Local Plan Wincheap is identified for the redevelopment and expansion of retail floorspace (Policy TCL7). The Canterbury District Retail and Leisure Study (2020, 2022) identifies a significant reduction in retail space needed compared to the 2017 Local Plan and therefore this plan can take an alternative more flexible approach to the redevelopment at Wincheap. In the new Local Plan, the site has been identified as a broad location for mixed use development, retaining the existing level of business, commercial and leisure floorspace and for residential development which should be compatible with the primary commercial function of the site. The council will work with stakeholders to prepare an SPD to facilitate the regeneration of the estate. The site also presents key opportunities to support the delivery of the new Transport Strategy for Canterbury, including the provision of a new car park in the north-east of the site to provide a terminal point for traffic heading to the city centre.



## Whitstable

The strategy for Whitstable is to focus major development where it can unlock opportunities for significant infrastructure investment; namely a new secondary school to the north of Chestfield, new A299 slips to the south of Chestfield to relieve congestion and a new park and bus facility to the south of Duncan Down to serve the town centre. All other smaller sites identified in the SLAA as suitable, available and achievable are proposed as allocations.

- 4.28. SLAA104, SLAA132 and SLAA172 are identified as suitable in the SLAA and are allocated as part of a strategic development area in South Whitstable. Together, these sites present important opportunities to deliver new and improved connectivity with the A299, a new park and bus facility for Whitstable and enhancements and extension to the Crab and Winkle Way.
- 4.29. SLAA247 Bodkin Farm is allocated for a new secondary for Whitstable and the coastal area, with supporting residential development. The site was identified as unsuitable in the SLAA due to concerns with capacity on the local highway network. The site is also situated within the existing designated Green Gap which is intended to prevent coalescence between Whitstable and Herne Bay. As set out in the draft IDP, there is a need for increased secondary school provision to support growth in the new Local Plan and there is currently an imbalance in the location of secondary school provision across the district, with many pupils from the coastal area travelling to schools in Canterbury. There are limited sites of sufficient size in the coastal area to provide a new secondary school. The proposed allocation at SLAA104 Brooklands Farm, as discussed above, facilitates the delivery of improved connectivity to the A299 through new on/off slips to the Thanet bound carriageway. Transport modelling undertaken to support the Local Plan has shown this to have positive benefits at the currently congested Chestfield roundabouts, unlocking potential for the provision of strategic educational infrastructure on this site. The site is therefore proposed for allocation for a new secondary school which will allow pupils to attend a school in their local area, some supporting residential development is also allocated in order to facilitate the delivery of the school. The draft site policy is designed to ensure that the development retains as much openness as possible within the Green Gap, with the school and its associated playing fields on the eastern side of the site.
- 4.30. SLAA222 and SLAA223 are both brownfield sites identified as suitable in the SLAA and are proposed for allocation.
- 4.31. The majority of 2017 Local Plan allocations in Whitstable are to be carried forward, with the exception of Policy EMP11 Whitstable Harbour which is to be replaced by Policy W2. The

harbour is identified as a broad location for mixed use development over the period of the Local Plan. In addition to fishing, commercial, business, employment, leisure and parking uses established in the 2017 Local Plan, to facilitate the regeneration of the area, some residential development will be supported on the site, where proposals are compatible with the maintenance and operational capability of the harbour.

### **Herne Bay**

A limited amount of development is proposed for Herne Bay which has seen significant levels of growth as part of the Canterbury District Local Plan 2017. The proposed sites seek to consolidate this growth, including through the provision of a new secondary school at Greenhill and by taking a more flexible approach to the 2017 allocations at Altira Park and Eddington Lane.

- 4.32. SLAA240 Thornden Close is allocated for a new secondary school for Herne Bay and the coastal area, with supporting residential development. The site was identified as unsuitable in the SLAA due to its location in the existing designated Green Gap which is intended to prevent confluence between Whitstable and Herne Bay. As set out in the draft IDP, there is a need for increased secondary school provision to support growth in the new Local Plan and there is currently an imbalance in the location of secondary school provision across the district, with many pupils from the coastal area travelling to schools in Canterbury. There are limited sites of sufficient size in the coastal area to provide a new secondary school, and it is considered that the delivery of strategic infrastructure on this site would be of overall benefit to Herne Bay and allow secondary school pupils to attend a school in their local area. The site is therefore proposed for allocation with supporting residential development in order to facilitate the delivery of the school. The draft site policy is designed to ensure that the development retains as much openness as possible within the Green Gap, with the school and its associated playing fields on the western side of the site.
- 4.33. SLAA067 and SLAA068 are both identified as suitable in the SLAA and are brownfield sites in the existing urban area, they are allocated for residential and employment uses respectively. SLAA042 is identified as suitable in the SLAA and is proposed for allocation for business or employment space, capitalising on the sites close proximity to the A299.
- 4.34. The majority of 2017 Local Plan allocations in Herne Bay are to be carried forward, however changes are proposed to the Eddington Lane, Altira and Metric Site existing allocations (Policy EMP1).
- 4.35. SLAA226A was submitted to Call for Sites for residential development. The site forms part of the existing allocation at Altira for employment uses only and is therefore identified as

unsuitable in the SLAA. The wider Altira site currently consists of large-format retail and employment uses with a hotel and restaurant in the west. The site remains a key opportunity for the delivery of commercial, business and employment uses, however the council recognises that development of the site has been slow to date. There is the potential for a small amount of supporting residential development to come forward in the west of the site in the area covered by SLAA226A, and an additional area of commercial development, to facilitate the delivery of further business and employment space within the site.

- 4.36. Policy EMP1 in the 2017 Local Plan identifies Eddington for business and storage and distribution uses. In the time since the 2017 Local Plan was adopted a small part of the site in the north-west corner has been built out, however development of the remaining site has not been forthcoming and it is understood that further development at the site is likely to be related to the expansion of the existing manufacturing business . The existing allocation is replaced with site allocation HB10, to support additional business floor space and, where demonstrated to be necessary, enabled by , some residential development within the site.
- 4.37. SLAA013 Metric Site, is identified as unsuitable in the SLAA as development of residential on the site conflicts with the existing employment allocation (EMP1). However in the absence of evidence demonstrating the site will come forward under the current allocation, and the site's location on the edge of a residential area, an allocation for residential development to replace the existing employment allocation is considered appropriate.
- 4.38. Opportunity Areas for regeneration over the Local Plan period have been identified for the northern half of the land between Market Street and William Street, William Street Coach Park and Central Parade between Pier Avenue and Lane End, as set out in Policy HB2.

### **New Garden Community**

- 4.39. The options consultation for the new Canterbury District Local Plan identified some support for a new settlement in the district as a means to accommodate housing growth. Of the sites submitted to the SLAA for housing development, only SLAA264 (near Blean), and the combination of sites SLAA262, SLAA268 and SLAA267 (near Adisham), are considered to be of a size and location where development would constitute a new sustainable community in the district. SLAA264 is identified as unsuitable in the SLAA with key concerns regarding accessibility to the site. The site also has the potential to adversely impact designated sites including Blean Complex SAC, Church Woods, Blean SSSI and Blean Woods NNR and the site includes West Blean & Thornden Woods SSSI.
- 4.40. SLAA262 and SLAA267 are identified as suitable in the SLAA, SLAA268 is identified as unsuitable in isolation, however in combination with the SLAA262 and SLAA267 to the north

and south, the sites present the opportunity for a new garden community, capitalising on the proximity to Adisham railway station. The three sites are therefore identified as a broad location for the development of Cooting Farm Garden Community over the Local Plan period. The council will work with stakeholders to prepare an SPD to facilitate the site's delivery.

### **Rural Service Centres**

#### *Blean*

Blean - Blean is a Rural Service Centre, a highly sustainable village where residents can meet most of their day-to-day needs within the settlement itself and is suitable for a scale of growth that supports its function. Site SLAA036 has been selected for allocation to support the vitality of the village and its ongoing function as a Rural Service Centre.

- 4.41. SLAA010, SLAA021 and SLAA178 are identified in the SLAA as suitable for housing development. However, following advice from the council's environmental consultants, it is understood that sites within 500m of Blean Woods could have the potential to adversely impact the designated sites and therefore have not been proposed for allocation.
- 4.42. In line with the spatial growth strategy, the council is seeking to allocate a small amount of development in Blean given its role as a Rural Service Centre. In the absence of any initial suitable sites, a further review was undertaken of sites proposed in Blean.
- 4.43. SLAA176 and SLAA054 are also within 500m walking distance of Blean Woods. Of the remaining sites outside the buffer area, SLAA111 and SLAA265 are considered remote from services in the settlement.
- 4.44. SLAA036 is located within the Blean Conservation Area and as it is located on the edge of the settlement the SLAA has raised concerns regarding landscape impact. Nevertheless, it is considered that a modest amount of development on the site could be sensitively designed to mitigate adverse impacts. The site is closely located near to existing facilities in the village and presents opportunities for improved walking and cycling connections to the Crab and Winkle Way from the north of the settlement. The site is proposed for allocation to meet the need for housing in the local area.

## *Bridge*

Bridge is a Rural Service Centre, a highly sustainable village where residents can meet most of their day-to-day needs within the settlement itself and is suitable for a scale of growth that supports its function, and its location within the AONB. Site SLAA218 is a brownfield site which has been selected for allocation to support the vitality of the village and its ongoing function as a Rural Service Centre.

- 4.45. The SLAA did not identify any suitable sites for housing development in the settlement. However in line with the spatial growth strategy and to meet local need for housing, a further review of SLAA061, SLAA217 and SLAA218 was undertaken SLAA218 is a brownfield site and is therefore considered the most appropriate for development. The site is proposed for allocation to meet the need for housing in the local area.

## *Chartham*

Chartham is a Rural Service Centre, a highly sustainable village where residents can meet most of their day-to-day needs within the settlement itself and is suitable for a scale of growth that supports its function. Sites SLAA110, SLAA115 and SLAA153 have been selected for allocation to support the vitality of the village and its ongoing function as a Rural Service Centre.

- 4.46. SLAA110 is the only proposed housing site in Chartham identified in the SLAA as suitable and it is proposed to allocate the site for housing development as it accords with the council's spatial growth strategy and also presents an opportunity for the provision of further local shopping and community facilities to enhance the sustainability of the settlement.
- 4.47. Both proposed employment sites in Chartham were identified as suitable in the SLAA. SLAA115 is a logical extension of existing commercial development on Ashford Road. SLAA153 has been allocated for the retention of the existing concrete batching plant on the site, which has had temporary consent. The permanent formalisation of the use on the site (which has been present since the 1980s), allows for the retention of existing local jobs, will support the local construction industry and gives an opportunity to provide improved landscape buffering around the site to provide visual separation between development and surrounding countryside.

### *Hersden*

Hersden is a Rural Service Centre, a highly sustainable village where residents can meet most of their day-to-day needs within the settlement itself and is suitable for a scale of growth that supports its function. Sites SLAA146 and SLAA163 have been selected for allocation to support the vitality of the village and its ongoing function as a Rural Service Centre.

- 4.48. Two sites in Hersden are identified as suitable in the SLAA, SLAA146 and SLAA163 and these are both proposed for allocation. SLAA146 provides a natural small extension to the existing strategic allocation in the Canterbury District Local Plan 2017 and SLAA163 allows for the consolidation of development to the south of the A28.

### *Littlebourne*

Littlebourne is a Rural Service Centre, a highly sustainable village where residents can meet most of their day-to-day needs within the settlement itself and is suitable for a scale of growth that supports its function. Sites SLAA098 and SLAA145 have been selected for allocation to support the vitality of the village and its ongoing function as a Rural Service Centre.

- 4.49. The SLAA identified two sites suitable for development in Littlebourne. SLAA098 is proposed for residential development and the provision of new local shopping and community facilities to serve new and existing residents. The site will provide a link road between A257 and Bekesbourne Lane, allowing traffic to bypass the centre of the settlement. SLAA145 provides a small extension in the north of the settlement and is allocated for residential use with a small amount of business space.

### *Sturry*

Sturry is a Rural Service Centre, a highly sustainable village where residents can meet most of their day-to-day needs within the settlement itself and is suitable for a scale of growth that supports its function. Sites SLAA011 and SLAA066 have been selected for allocation to support the vitality of the village and its ongoing function as a Rural Service Centre.

- 4.50. SLAA011 is identified in the SLAA as suitable for residential development. The same site area was also submitted for commercial development, however is unavailable for this use. The site is proposed for allocation as a northern extension to the settlement, expected to come forward in the middle years of the plan, due to the need for the implementation and full

operation of the Sturry Relief Road to provide improved highway capacity in the local area. Development is proposed on the southern part of the site adjacent to the existing settlement, with the existing Green Gap between Sturry and Broad Oak significantly extended across the northern part of the site to protect against coalescence between the two settlements.

- 4.51. SLAA066 is also identified as suitable in the SLAA and is proposed for allocation as a small extension to the existing strategic site in the Canterbury Local Plan 2017.

#### *Aylesham*

- 4.52. Aylesham is located within the administrative area of Dover District Council, however Canterbury District is located immediately adjacent to the west and south of the settlement. Aylesham is identified in the Regulation 18 draft Dover Local Plan 2040 as a Rural Service Centre with a range of services and facilities where residents can meet their day-to-day needs within the settlement, including two primary schools, a village hall, fire station, sports club, social club, leisure centre, library and local shopping facilities. There are also two employment areas in the settlement providing local job opportunities and good rail and bus connections to Dover and Canterbury.
- 4.53. The Regulation 18 draft Dover Local Plan 2040 proposed an allocation at South Aylesham (Strategic Policy 6), for approximately 640 new homes. SLAA180 is identified as suitable in the SLAA and is proposed to be allocated for residential development to complement the adjacent allocation within Dover District. The site also provides a key opportunity for the delivery of a new Country Park, providing small-scale visitor facilities, new and enhanced pedestrian and cycle routes including activity trails, and enhanced ecological network.

#### **Local Service Centres**

#### *Adisham*

Adisham is a Local Service Centre with a limited range of services and facilities for residents but considered to be relatively sustainable in the wider context of the district and is suitable for a limited scale of growth that supports its function. Site SLAA185 has been selected for allocation to support the vitality of the village and its ongoing function as a Local Service Centre.

- 4.54. In Adisham, SLAA185 is the only site assessed in the SLAA and found to be suitable. A frontage only development is proposed for allocation in keeping with the existing built form of the settlement.

### *Barham*

Barham is a Local Service Centre with a limited range of services and facilities for residents but considered to be relatively sustainable in the wider context of the district and is suitable for a limited scale of growth that supports its function and its location within the AONB. Site SLAA062 has been selected for allocation to support the vitality of the village and its ongoing function as a Local Service Centre.

- 4.55. SLAA062 was the only site assessed in the SLAA and was found to be suitable in Barham. It is therefore proposed to be allocated for 9 dwellings as an extension of The Grove and is not considered to constitute major development in the AONB.

### *Broad Oak*

Broad Oak is a Local Service Centre with a limited range of services and facilities for residents but considered to be relatively sustainable in the wider context of the district and is suitable for a limited scale of growth that supports its function. Sites SLAA235 and SLAA045 have been selected for allocation to support the vitality of the village and its ongoing function as a Local Service Centre. Site SLAA233 has been selected for allocation to provide strategic utility infrastructure.

- 4.56. The SLAA has identified three housing sites, SLAA045, SLAA 221 and SLAA235 as suitable, however to allocate all these sites would conflict with the role of Broad Oak as a Local Service Centre. Kent County Council (KCC) as Local Highway Authority have also raised concerns regarding the cumulative highway impact of development in Broad Oak should all sites be allocated. The brownfield site SLAA235 and small infill site SLAA045 are therefore the only sites in Broad Oak proposed for allocation. SLAA235 is also part allocated for business use, reflecting the existing planning consent on part of the site.
- 4.57. SLAA233 presents a key opportunity for water infrastructure to support development in the District and wider area - as outlined in South East Water's emerging Regional Plan. The site is allocated for a new reservoir and Country Park with associated development. The provision of leisure facilities on the site is a unique offering for the District and allows the site to deliver both functional and recreational benefits for local communities.



### *Hoath*

Hoath is a Local Service Centre with a limited range of services and facilities for residents but considered to be relatively sustainable in the wider context of the district and is suitable for a limited scale of growth that supports its function. Site SLAA202 has been selected for allocation to support the vitality of the village and its ongoing function as a Local Service Centre.

- 4.58. SLAA202 was the only site assessed in the SLAA and was found to be suitable in Hoath. It is therefore proposed for allocation in accordance with the spatial growth strategy. The site will also provide an opportunity for the provision of local shopping and community facilities with shared overflow car parking for the nearby primary school.

### *Rough Common*

Rough Common is a Local Service Centre with a limited range of services and facilities for residents but considered to be relatively sustainable in the wider context of the district and is suitable for a limited scale of growth that supports its function. Site SLAA116 has been selected for allocation to support the vitality of the village and its ongoing function as a Local Service Centre.

- 4.59. SLAA116 comprises the existing Canterbury District Local Plan 2017 allocation at Land to the rear of 51 Rough Common Road and additional land to the south. The SLAA identified the additional land as unsuitable, therefore the existing allocation is to be carried forward in its current form.

### *Harbledown, Lower Hardres, Petham, Westbere and Wickhambreaux.*

- 4.60. No sites were identified to be suitable for development in the Local Service Centres of Harbledown, Lower Hardres, Petham, Westbere, Wickhambreaux. The spatial growth strategy for the district only seeks to allocate limited development in Local Service Centres, where suitable sites are available. Policy R21 will provide the policy framework for further growth within these settlements.

### **Countryside**

- 4.61. Rural settlements in the district classified as Villages or Hamlets in the Rural Settlement Study (2020) have either no services or very limited services and are generally considered to be unsustainable locations for new housing development. Sites in these settlements or in

isolated countryside locations have not been proposed for allocation in accordance with the spatial growth strategy.

### **Summary**

- 4.62. A summary of all SLAA sites proposed for allocation, or identified as part of a broad development location or an opportunity area is provided in Table 4.2. A summary of the status of all 2017 Local Plan allocations is provided Table 4.3. Further details for all sites are included in Appendix B.

*Table 4.2 - Summary of proposed SLAA sites.*

SLAA Reference	Site Name	Allocation Status	Policy Reference
<b>Canterbury</b>			
SLAA056	Land on the eastern side of Shelford Landfill	Allocated	C22
SLAA065	Former Gas Holder Site, Simmonds Rd, Wincheap	Identified as part of Wincheap broad location for development.	C23
SLAA090	Milton Manor House	Allocated	C8
SLAA099	43-45 St George's Place	Allocated	C2
SLAA102	Land at the Former Chaucer Technology School	Allocated	C19
SLAA105	Land to the north of the railway line and south of Bekesbourne Lane	Allocated	C13
SLAA122	Land south of Littlebourne Road	Allocated	C12
SLAA128	Land at Langton Lane	Allocated	C6
SLAA137B	Land North of Cockering Road	Allocated	C9
SLAA151	Merton Park	Allocated	C6
SLAA155	Canterbury Business Park	Allocated	C21
SLAA156	Land at Station Road East	Allocated	C18
SLAA162	Folly Farm	Allocated	C20
SLAA181	Bamboo Tiger, Carpet Right, Beds4Less	Identified as part of Wincheap broad location for development.	C23
SLAA183	Canterbury Golf Club	Allocated	C15
SLAA192	Land to the rear of 62 Burgate	Identified as part of Opportunity Area	C3
SLAA239	Becket House	Allocated	C17
SLAA259	Land on the west side of Hollow Lane	Allocated	C7
SLAA266	Land on Bekesbourne Lane at Hoath Farm/ Land north of Bekesbourne Lane	Allocated	C14

SLAA Reference	Site Name	Allocation Status	Policy Reference
<b>Whitstable</b>			
SLAA104	Brooklands Farm, Whitstable	Allocated	W5
SLAA132	Land South of Thanet Way	Allocated	W6
SLAA141	Oyster Indoor Bowling Centre and Whitstable Harbour Garage	Identified as part of Whitstable Harbour broad location for development	W2
SLAA172	Land at Golden Hill	Allocated	W7
SLAA222	37 Kingsdown Park	Allocated	W10
SLAA223	St Vincent's Centre	Allocated	W9
SLAA247	Land east of Bodkin Farm	Allocated	W8
<b>Herne Bay</b>			
SLAA013	Former Metric Site, Sweechbridge Road	Allocated	HB9
SLAA014	Blacksole Farm, Margate Road	Land allocated under SLAA226A	-
SLAA026	Moyne	Land allocated under SLAA226A	-
SLAA042	Hawthorne Corner	Allocated	HB6
SLAA067	Land comprising Nursery Industrial Units and former Kent Ambulance Station	Allocated	HB5
SLAA068	Former Gas Holder Site	Allocated	HB7
SLAA226A	Blacksole Farm and Moyne	Forms part of revised Altira allocation.	HB8
SLAA240	Land at Greenhill adjacent Thornden Close (Land to the West of Thornden Wood Road)	Allocated	HB4
<b>Rural</b>			
SLAA011	Land North of Popes Lane	Allocated	R18
SLAA036	Mill Field	Allocated	R4
SLAA045	Land fronting Mayton Lane, Broad Oak	Allocated	R25
SLAA062	Land adjacent to Valley Road, Barham	Allocated	R23
SLAA066	The Paddocks, Shalloak Road, Sturry	Allocated	R19
SLAA098	Land off The Hill, Littlebourne	Allocated	R15
SLAA110	Land to the West of Rattington Street	Allocated	R8

SLAA Reference	Site Name	Allocation Status	Policy Reference
SLAA115	Land at Ashford Road	Allocated	R9
SLAA145	Land North of Court Hill, Littlebourne	Allocated	R16
SLAA146	Land at Hersden	Allocated	R13
SLAA153	Milton Manor Concrete Batching Plant	Allocated	R10
SLAA163	Bread and Cheese Field	Allocated	R12
SLAA180	Aylesham South	Allocated	R20
SLAA185	Land at Station Road/ Land west of Cooting Lane	Allocated	R22
SLAA202	Land at Church Farm, Hoath	Allocated	R27
SLAA218	Great Pett Farmyard	Allocated	R6
SLAA214	Land off the Hill Littlebourne	Allocated as part of SLAA098	-
SLAA233	Broad Oak Reservoir	Allocated	R26
SLAA235	Land at Goose Farm, Shalloak Road	Allocated	R25
SLAA262	Land west and East of Cooting Lane, Adisham	Allocated	
SLAA267	TT21601 - Land at Cooting Farm	Allocated	
SLAA268	Land On The South East Side Of Cooting Lane, Adisham	Allocated	

*Table 4.3 - Summary of 2017 Local Plan sites carried forward*

Local Plan 2017 Policy Reference	Site Name	Allocation Status
HD1 CA308	124 & adjoining Middle Wall, Whitstable	Carried forward
HD1	Barham Court Farm, Barham	Carried forward
HB2	Beach Street, Herne Bay	Carried forward
HD1 CA507	Castle Street Car Park, Canterbury	Carried forward
HD1 CA340	Garage Site, Kings Road, Herne Bay	Carried forward
HD1 CA281	Hawks Lane, Canterbury	Carried forward
HD1 CA477	Holmans Meadow Car Park, Canterbury	Carried forward
HD1 CA347	Ivy Lane North, Canterbury	Carried forward
HD1 CA481	Land adjacent to Canterbury West Station, Canterbury	Carried forward
HD1	Land at and adjacent to Herne Bay Golf	Carried forward

Local Plan 2017 Policy Reference	Site Name	Allocation Status
	Driving Range, Greenhill	
HD1	Land at Bullockstone Road, Herne Bay	Carried forward
HD1 CA491	Land at Herne Bay Station	Carried forward
HD1 CA530	Land at Ladysmith Grove	Carried forward
HD1	Land to rear of 51 Rough Common Road, Rough Common	Carried forward
HD1 CA278	Northgate Car Park, Canterbury	Carried forward
HD1 CA043B	Rosemary Lane Car Park, Canterbury	Carried forward
SP3 Site 1	Land at South Canterbury	Carried forward
SP3 Site 5	Land at Strode Farm, Herne Bay	Carried forward
SP3 Site 8	Land North of Hersden	Carried forward
HD1 CA286	St John's Lane Car Park, Canterbury	Carried forward
HD1 CA282	St Johns Lane Employment Exchange, Canterbury	Carried forward
HD1	St Martin's Hospital, Canterbury	Carried forward
HD1 CA047	St Radigund's Place, Canterbury	Carried forward
HD1 CA524	Tankerton Road car park & garage, Whitstable	Carried forward
EMP1	Altira	Added residential development as assessed under SLAA226a, and replaced with Site HB8
EMP1	Eddington Business Park	Added residential development and replaced with Site HB10
EMP11	Whitstable Harbour	Added residential development and replaced with Site W2
TCL7	Wincheap	Added residential development and replaced with Site C23
SP3 Site 2	Broad Oak / Sturry	Planning permission and under construction
SP3 Site 3	Land at Hillborough, Herne Bay	Planning permission and under construction
SP3 Site 4	Land at Herne Bay Golf Course, Herne Bay	Planning permission and under construction
SP3 Site 6	Land at Greenhill, Herne Bay	Planning permission and under construction
SP3 Site 7	North of Thanet Way, Whitstable	Planning permission and under construction
SP3 Site 9	Land at Howe Barracks, Canterbury	Planning permission and under construction
SP3 Site 11	Land at Cockerling Farm, Thanington	Planning permission and under construction

Local Plan 2017 Policy Reference	Site Name	Allocation Status
SP3 Site 12	Land South of Ridgeway (Grasmere pasture) Chestfield	Planning permission and under construction
HD1	Kingsmead Field	Planning permission and under construction
HD1 CA480	Kingsmead depot, Canterbury	Planning permission and under construction
HD1 CA375/ HB3	Herne Bay Bus Depot, Herne Bay	Planning permission and under construction

## 5. Neighbourhood Plans

- 5.1. The NPPF requires the housing need for designated neighbourhood areas to be identified within strategic policies of the Local Plan<sup>10</sup>.
- 5.2. There are five designated areas in our district which are in the process of producing neighbourhood plans:
- Bridge
  - Chartham
  - Fordwich
  - Thanington
  - Upper Hardres
- 5.3. Based on the 2017 Local Plan saved sites, the spatial growth strategy and proposed allocations, Bridge, Chartham and Thanington have sites allocated for housing within their designated areas.

*Table 5.1: Proposed and saved allocations in neighbourhood plan areas.*

Designated Area	Allocations	Homes
Bridge	R4: Land at Mill Field	13
Chartham	R8: Land to the West of Rattington Street	170
Thanington	Site 11: Land at and adjacent to Cockerling Farm Thanington	1,150
	C7: Land to the North of Hollow Lane	735 homes and 74 units of older persons' accommodation
	C8: Milton Manor House	95
	C9: Land to North of Cockerling Road	36

- 5.4. In addition to these allocations, an analysis of the historic completion trends for each neighbourhood area has been completed. The number of completions between 2017/18 and 2020/21 have been analysed to identify the average annual windfall completions within these areas. This does not include completions on sites allocated in the 2017 Local Plan.

<sup>10</sup> Paragraph 66

- 5.5. Projected over the 25 year Local Plan period (2020 - 2045), the average windfall figure provides a housing need figure for each neighbourhood plan area. The proposed and saved allocations (Table 5.1) have not counted towards the housing need figures identified in Table 5.2 as this could undermine the effectiveness of the Local Plan and Neighbourhood Plans.

Table 5.2: Average windfall completions and housing needs by neighbourhood plan area.

	Average number of completion per annum	Number required over the 25 year Local Plan period
Bridge	3	75
Chartham	2	50
Fordwich	0	0
Thanington	0	0
Upper Hardres	0	0

- 5.6. Three dwellings at Bridge and two dwellings at Chartham per annum is the proportion of the district's windfall housing figure which would be anticipated within each of these areas. By identifying these figures, the Neighbourhood Plan groups have the choice to allocate land within their Neighbourhood Plan or contain policies to address these housing needs.
- 5.7. To summarise:
- **Bridge** - In addition to the 13 homes allocated on Site R4, between 2020 and 2045, the neighbourhood plan housing requirement figure for Bridge Parish is 75 dwellings.
  - **Chartham** - In addition to the 170 homes allocated on Site R8, between 2020 and 2045, the neighbourhood plan housing requirement figure for Chartham Parish is 50 dwellings.
  - **Fordwich** - The neighbourhood plan housing requirement figure, between 2020 and 2045, for Fordwich Parish it is zero dwellings.
  - **Thanington** - In addition to the 1,150 dwellings on Site 11 (Policy SP3), in the Canterbury District Local Plan (2017), 735 homes and 74 units of older persons' accommodation allocated on Site C7, 95 homes allocated on C8 and 36 homes allocated on C9, between 2020 and 2045, the neighbourhood plan housing requirement figure for Thanington Parish is zero dwellings.



- **Upper Hardres** - The neighbourhood plan housing requirement figure, between 2020 and 2045, for Upper Hardres Parish is zero dwellings.

## 6. Meeting the districts housing need

### Land supply components

- 6.1. The district's housing land supply consists of several components:
- **Saved allocations from the 2017 Local Plan:** as identified in section 4 and Appendix B;
  - **Proposed draft Canterbury District Local Plan to 2045 allocations:** as identified in section 4 and Appendix B;
  - **Extant planning permissions:** extant permissions are other sites with planning permission for residential development that are either not started or were under construction as of 31 March in the survey year;
  - **Completions:** residential development units which have been completed in 2020/21<sup>11</sup>; and
  - **Windfalls:** sites which have not been specifically identified as available in the development plan process.
- 6.2. For the purposes of classifying “housing supply” newly-built homes as well as conversions, changes of use, demolitions and redevelopments are included.
- 6.3. Homes are classed as any self-contained permanent residential dwelling which includes student accommodation and older persons' accommodation (C2).
- 6.4. It is important to note that the ‘net’ increase to the housing stock is reflected within the figures. The reuse of empty homes or the replacement of existing dwellings do not contribute to the ‘net’ supply of new housing.
- 6.5. All student accommodation (communal halls of residence or self-contained dwellings, on or off campus) and older persons' housing (communal accommodation or self-contained dwellings), are included within the housing supply with the appropriate ratio<sup>12</sup>.
- 6.6. These types of accommodation are required to be assessed for the government's HDT and our housing land supply calculations in slightly different ways. This is likely to cause modest

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<sup>11</sup> 2021/22 data is not currently available

<sup>12</sup> In accordance with the revised NPPF and national guidance.

discrepancies between the level of completions recorded for each monitoring year under the HDT results and the published land supply, but cannot be avoided.

## Windfall data

- 6.7. The NPPF encourages the support of windfall development sites. It also states an allowance can be made for windfall sites in land supply calculations where there is compelling evidence demonstrating it is a reliable source of supply (paragraph 71).
- 6.8. For the 2017 Local Plan, it was demonstrated that windfalls have historically formed part of the land supply with past windfall rates of 49% of the overall completion rate<sup>13</sup>. A windfall allowance of 138 dwellings per annum was agreed by the Planning Inspector, based on expected completions on small sites of less than five units only.
- 6.9. The Inspector concluded that 138 dwellings per annum was a conservative assumption and confirmed that no additional allowance for lapsed permissions was necessary.
- 6.10. The updated housing monitoring data continues to show higher-than-anticipated levels of small site windfall completions and also that large windfall sites continue to be granted in addition to the allowance.
- 6.11. Table 6.1 identifies that windfalls have continued to be the main supply of housing since the last Local Plan was adopted, providing 75% of the completions over this period. This provides reliable evidence that windfall sites remain an important and reliable source of housing supply in the district.

*Table 6.1: Split of windfall and allocated site completions*

	Net completions			Percentage (%)	
	Allocations	Windfall	Total	Allocations	Windfall
<b>2017/18</b>	100	1,019	<b>1,119</b>	9	91
<b>2018/19</b>	105	338	<b>443</b>	24	76
<b>2019/20</b>	298	299	<b>597</b>	50	50
<b>2020/21</b>	160	314	<b>474</b>	34	66

- 6.12. Even through a period of time which has seen Covid-19 and the Stodmarsh water quality concerns disrupt the delivery of development in parts of the district, the delivery of windfall

<sup>13</sup> Based on completion data from 1993/94 to 2013/14 in *Canterbury District Local Plan Review Public Examination. Topic Paper 2: Housing (2014)*, page 15. Available from: <https://drive.google.com/file/d/1hQNk03zU3NyuU90vWFVMRn9ob3r5IJnw/view?usp=sharing>

sites continues to be an important component of meeting housing needs. As such, the council has reviewed the number of completions on windfall sites of all sizes.

- 6.13. For residential developments only, windfall completions on brownfield sites were considered. This was in line with the NPPF requirement to allocate land with the least environmental or amenity value (paragraph 175).

*Table 6.2: Windfall completions on brownfield land*

Net Completions	0 and below dwellings	1-5 dwellings	6-9 dwellings	10+ dwellings	Total across all sizes
2017/18	-31	62	24	175	208
2018/19	-17	95	50	71	199
2019/20	3	68	-3	81	149
2020/21	-3	52	21	51	121
Total	-48	277	92	356	677
<b>4 year average</b>	<b>-12</b>	<b>69</b>	<b>23</b>	<b>89</b>	<b>169</b>

- 6.14. Small sites<sup>14</sup> and smaller sites<sup>15</sup> will build out within two years of being granted planning permission. The Stodmarsh water quality issues were identified in 2019 and resulted in fewer planning permissions being decided. This is likely to be the reason why the last two years had lower windfall completions. The Draft Canterbury District Nutrient Neutrality Strategy seeks to identify actions so that this issue can be addressed.
- 6.15. Older persons' and student accommodation brownfield windfall development was also reviewed, as summarised in Table 6.3.

*Table 6.3: Older persons' and student accommodation windfall development on brownfield sites*

Net Completions	Older persons' accommodation	Student accommodation
2017/18	-10	676
2018/19	32	7
2019/20	10	22

<sup>14</sup> This refers to schemes of less than 5 dwellings as set out in the Phasing Methodology 2018.

<sup>15</sup> This refers to schemes for 6-100 dwellings which are granted through detailed planning permission as set out in the Phasing Methodology 2018.

2020/21	27	117
Total	58	821
<b>4 year average</b>	<b>14</b>	<b>205</b>

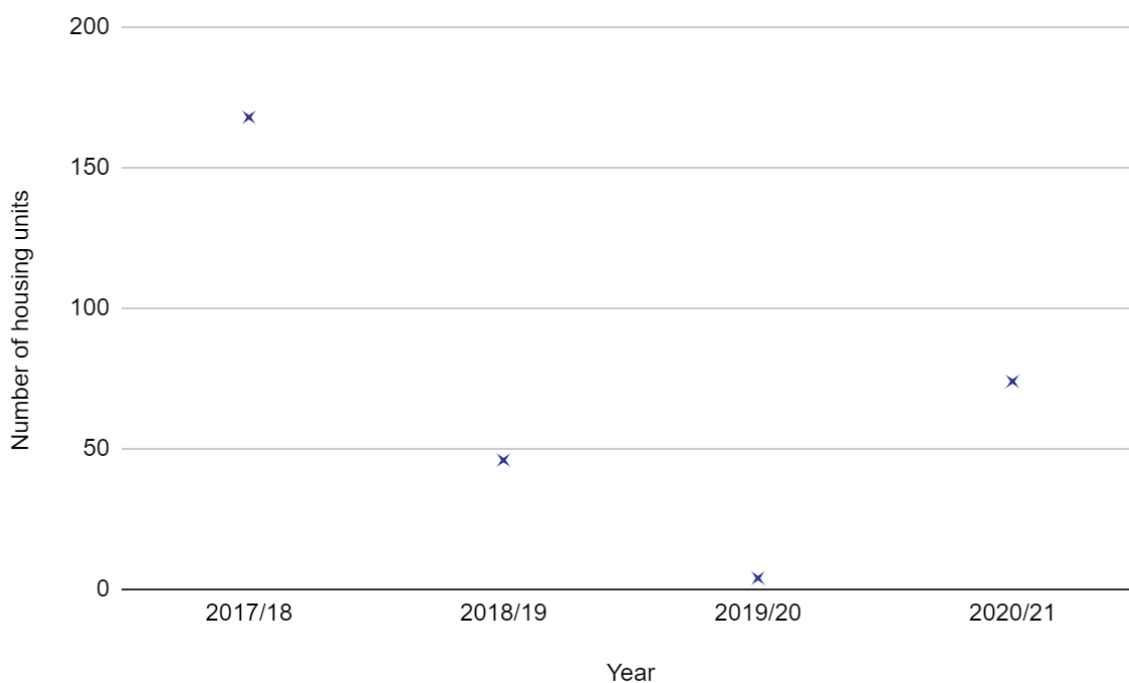
- 6.16. Student accommodation varies year on year with little consistency. Paired with the HNA determining there are no identified student accommodation needs over the local plan period, there is a chance that the market for student accommodation is becoming saturated and may tail off over time. Therefore, no windfall figure for student accommodation is proposed.
- 6.17. The four year average for older persons' accommodation is minimal. It is therefore proposed that the windfall figure should be based on the residential windfall development only.
- 6.18. Taken together it is proposed that the windfall figure is based only on brownfield residential windfall development, excluding greenfield development, student accommodation and older person accommodation. This is considered to be a robust, if conservative, projection of reliable future ongoing windfall supply in the district, and amounts to 170 dwellings<sup>16</sup> per annum from year four of the housing land supply to 2045 which has been considered in the land supply calculations.

## Lapsed data

- 6.19. As set out at Figure 6.1 the number of lapsed planning applications for housing over the past four years is highly variable with no obvious trend.
- 6.20. In 2017/18 the number of lapsed applications was higher due to the lapse of a couple of 40-50 home prior notification applications only. These applications were initially submitted shortly after the prior notification process was introduced and were likely never intended to be built out.

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<sup>16</sup> Rounded to a whole number



*Figure 6.1: Number of lapsed applications per year*

- 6.21. The council considers that the lapsed rate is inconsistent year on year and in general negligible when compared to the overall housing need. Therefore, no allowance for a lapse rate is included within the windfall allowance calculations.

## Housing land supply

- 6.22. A five year housing land supply is not being presented at this time but will be presented at Regulation 19 stage. Housing and infrastructure delivery timescales are still being reviewed; including discussions with developers on build out times, analysis of when the infrastructure requirements are critically needed and can be physically built, and consideration of whether a stepped housing trajectory will be proposed due to the strategic nature of many of the proposed allocations.
- 6.23. At this point, Table 6.4 contains the calculation demonstrating how the LHN can be met over the Local Plan period as a whole.

*Table 6.4: Land supply calculation*

Draft Local Plan annual requirement	1,252
Draft Local Plan requirement 2020-45	31,300
Total completions from 2020/21	591

<b>Residual requirement</b>	<b>30,709</b>
Existing Planning permissions <sup>17</sup>	2,295
Saved allocations from 2017 Local Plan	11,970
Draft proposed allocations <sup>18</sup>	13,035
Windfall allowance <sup>19</sup>	3,446
<b>Total land supply</b>	<b>30,746</b>
<b>Surplus</b>	<b>37</b>

## Small Sites

- 6.24. The NPPF requires that 10% of the housing requirement to be built on sites no larger than one hectare (paragraph 69).
- 6.25. Having reviewed the land supply components, the draft Local Plan is making provision for around 11% of the total housing requirement to be on small and medium sites, as set out at Table 6.5.

*Table 6.5: Number of dwellings on small sites*

	Number of dwellings
Existing Planning permissions	956
Saved allocations from 2017 Local Plan	450
Draft proposed allocations	178
Windfall allowance <sup>20</sup>	1,861
Total supply on sites of 1ha or smaller	3,445
<b>Percentage of overall housing need</b>	<b>11%</b>

<sup>17</sup> This includes residential as well as older persons' and student accommodation appropriately ratioed

<sup>18</sup> This includes older persons' accommodation precautionarily ratio-ed at 1.8

<sup>19</sup> 170 per year for the last 20 years, and 46 for year 5 (just 1 year) due to the continued impacts of Stodmarsh water quality concerns

<sup>20</sup> This is based on the percentage of the windfall allowance from development for 1-9 dwellings (non-major), which was 54% of the total windfall allowance.

## Different groups in our community

- 6.26. The NPPF sets out that the need for housing from different groups within the community should be assessed and defined in the Local Plan policies.
- 6.27. In accordance with the NPPF, the HNA (2021) assessed the housing need for different groups in the community including:
- those who require affordable housing
  - families with children
  - older people
  - students
  - people with disabilities
  - service families
  - gypsy and travellers
  - people who rent their homes
  - people wishing to commission or build their own homes

## Affordable Housing

- 6.28. The affordability of housing in the district continues to present a significant challenge to those seeking to buy or rent housing. This particularly applies to households that are unable to access housing at market levels.
- 6.29. The HNA (2021) sets out a requirement of 464 affordable homes per year. This is broken down into 308 affordable / social rent (66%) and 156 affordable home ownership (34%).
- 6.30. Between 2020 and 2045, there is a need for **11,600** affordable homes: **7,700** affordable / social rent and **3,900** affordable home ownership.
- 6.31. The HNA (2021) did not take account of any affordable housing units completed in 2020/21 or those secured to be delivered in the future.
- 6.32. Table 6.6 sets out the 57 completions and 1,333 secured units. The affordable housing units considered are those which have existing planning permissions, S106 agreements or other agreements in place. Sites pending a decision or allocated without a granted planning permission are not counted at this stage.



*Table 6.6: Affordable housing requirements for 2020-2045*

	Affordable / social rent	Affordable home ownership	Total units
2020-2045 requirement	7,700	3,900	11,600
Completions 2020/21	35	22	57
Secured units <sup>21</sup>	1,333	609	1,942
Remaining requirement	6,332	3,269	9,601

- 6.33. Table 6.6 establishes that when the completions and secured units are deducted from the Local Plan period requirement, there is a need for a further 9,601 units. 66% of this is for affordable and social rent, while 34% is affordable home ownership.
- 6.34. The government introduced a mandatory 25% first homes requirement. Based on the government's guidance and local needs this was taken off the affordable home ownership requirements to leave an affordable home tenure split of:
- 66% affordable or social rent;
  - 25% first homes; and
  - 9% affordable home ownership.
- 6.35. The draft Local Plan will seek 30% affordable housing on proposals for 10 or more dwellings, or on sites of 0.5 hectares or greater, which aligns with the NPPF definition of major development.
- 6.36. Table 6.7 shows 5,502 affordable homes will be provided from the remaining saved 2017 Local Plan allocations and draft proposed allocations for 10 or more dwellings.

*Table 6.7: Future supply of affordable housing*

	Total affordable housing
Remaining 2020-2045 requirements	9,601
Saved 2017 Local Plan allocations <sup>22</sup>	1,772
Draft 2020-2045 Local Plan allocations	3,730
Outstanding requirement	4,099

<sup>21</sup> Includes units secured through S106 agreement, granted planning permission and other agreements.

<sup>22</sup> This excludes those with planning permission which have already been counted in Table 6.6.

- 6.37. 65% of the district’s affordable housing need has been identified on sites in the draft Local Plan.
- 6.38. The Canterbury District Local Plan Viability Study (2022) confirms that the 30% affordable housing and tenure split is achievable across the district. It also provides evidence that proposals for student accommodation and sheltered housing can viably make contributions to affordable housing provision in the district.
- 6.39. Based on this evidence; in addition to commuted sums on schemes between six to nine dwellings within the Kent Downs Area of Outstanding Natural Beauty, the draft Local Plan makes provision for affordable housing contributions from other development types:
- student accommodation (excluding shared living housing): 30%
  - sheltered housing (greenfield and brownfield sites): 30%
  - extra-care housing (greenfield sites): 20%
- 6.40. Additionally, there will be other affordable housing units coming forward through the Local Plan period. Either from windfall development which meet the criteria, bespoke affordable housing schemes or where over 30% is provided on large developments.
- 6.41. Homes England and housing associations are actively exploring opportunities for further affordable housing, such as ongoing discussion about increasing the amount of affordable housing above 30% on certain large sites.
- 6.42. The council is also actively providing affordable housing, including going above the 30% policy requirement like at the Kingsmead Depot (Riverside project).
- 6.43. **Policy DS1 - Affordable housing** in the draft Local Plan sets out the requirements and aims to support the provision of affordable housing in the district.

### **Housing Mix**

- 6.44. The HNA (2021)<sup>23</sup> identified a housing mix broken down by tenure, dwelling type, dwelling size and sub-geography areas.
- 6.45. This information, in addition to the Canterbury District Local Plan Viability Study (2022)<sup>24</sup>, has informed the draft Local Plan policies on housing mix and will in due course inform a revision to the existing Canterbury District Housing Strategy.

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<sup>23</sup> Canterbury City Council Housing Needs Assessment

<sup>24</sup> Canterbury City Council Local Plan Viability Study

6.46. **Policy DS2 - Housing mix** sets out the proposed market and affordable housing mix by Canterbury, coastal towns (Whitstable and Herne Bay), rural north and rural south in line with the HNA.

## **Students**

6.47. Canterbury district has one of the highest ratios of students to permanent residents in England, at 16.4%, compared to a national average of 6%.

6.48. However, since the 2011 Census, the number of full-time students per Purpose Built Student Accommodation (PBSA) bedspace has reduced from 3.6 to 1.9. The increase in PBSA has coincided with a decrease in the number of HMOs in the Canterbury district.

6.49. The HNA (2021) determined that in the short term there is unlikely to be a substantial increase in demand for student accommodation and the long-term impacts are uncertain due to multiple factors including Covid-19 pandemic and Brexit.

6.50. The HNA (2021) recommended that the need for PBSA be kept under review alongside university growth plans. It also advised that conversions to and the proportion of HMOs continue to be controlled through Local Plan policies and the Article 4 direction.

6.51. The evidence gathered for both this and the previous Local Plan indicates that the level of student accommodation in the open market distorts the general housing market to some degree and also results in the loss of small family accommodation. The HNA (2021), through the identified housing mix, indicated that small family accommodation is still an area of need.

6.52. There is an Article 4 direction covering the urban area of the city of Canterbury and the parishes of Blean, Fordwich, Hackington, Harbledown and Rough Common, Sturry and Thanington, to require planning applications to be sought for small HMOs, which primarily serve the student population.

6.53. The Article 4 direction and proposed **Policy DM3 - Housing in multiple occupation (HMOs)** in the draft Local Plan seeks to continue control the proliferation of further HMOs which, as the HNA indicates, has had positive effects since being introduced. Therefore no revision is needed to the Article 4 direction.

6.54. The draft Local Plan also encourages the Higher Education Institutions (HEIs) to build PBSA on campus where it is achievable or at least within a 10 minute walking distance of campus (**Policy DS5 - Specialist housing provision** of the draft Local Plan).

## Older people

- 6.55. Substantial growth in the district's older age (65+) population is expected with between 14,000 and 16,850 more people projected to 2040.
- 6.56. The HNA (2021) identified two growth scenarios<sup>25</sup>. The higher growth scenario identifies the need for 220 older person bedspaces per year, almost 18% of the LHN per year, and the lower growth scenario is 173 older person bedspaces per year (14% of the LHN per year).
- 6.57. Both scenarios account for a substantial amount of the LHN. The HNA (2021) recommended that to accommodate the population increase, the draft Local Plan should support the lower growth scenario. This will allow a balance of other housing needs such as affordable housing, and aligns greatest with KCC's aspirations for people to be able to live in their homes longer.
- 6.58. There have been completions in 2020/21 and a number of units secured through planning permission which reduces the overall need over the period of the local plan. Based on the HNA (2021) and these land supply components, the older persons' accommodation needs for 2020-2045 are identified in Table 6.8.

Table 6.8: Older persons' accommodation needs between 2020-2045

Housing Type	Amount required	2020/21 completions	Secured supply	Residual need
<b>Age Exclusive Housing</b>	<b>720</b>	-	-	<b>720</b>
<b>Specialist (units)</b>	<b>2,165</b>	<b>24</b>	<b>50</b>	<b>2,091</b>
Retirement/Sheltered Housing	1,935	-	-	1,935
Enhanced Sheltered Housing	59	-	-	59
Extra Care Housing	171	24	50	97
<b>Care Homes (beds)</b>	<b>1,438</b>	<b>5</b>	<b>172</b>	<b>1,261</b>
Care Home without nursing (beds)	1,065	5	172	888
Care Home with nursing (beds)	373	-	-	373

- 6.59. Specific sites just for older persons' accommodation have not been identified through the draft Local Plan. However, to address this specific need directly, schemes of 300 homes or more must provide a minimum of 10% older persons' accommodation. This seeks to encourage community cohesion and discourage isolated care facilities with limited access to

<sup>25</sup> Canterbury City Council Housing Needs Assessment, p.46

sustainable transport links and poor access to shops and local community services and facilities.

- 6.60. The type of older persons' accommodation has not been specified at this stage. Proposals are expected to consider the local needs of the area, KCC's advice, Canterbury Housing Strategy and the HNA at the point of application.
- 6.61. The draft proposed allocations are anticipated to provide around 1,039 older persons' bedspaces (26% of the residual need). **Policy DS5 - Specialist housing provision** seeks to encourage further older persons' accommodation and protect against the loss of any existing supply.
- 6.62. KCC has aspirations for people to remain in their homes for as long as possible which would reduce the need for bespoke older persons' accommodation. Therefore, to support these aspirations it is proposed that more adaptable homes are provided rather than allocating land to meet the entire quantitative need figure (see section Chapter 6: People with disabilities). This will be kept under review to determine whether suitable accommodation for older people is being adequately provided.
- 6.63. The HNA also identified a need for 2,440–2,950 bungalows by 2040 which would equate to 3,050-3,688 bungalows between 2020-2045<sup>26</sup>. Bungalows require significantly more land, lowering the housing density. To start meeting this need, in **Policy DS2 - Housing mix** proposals for 100 or more dwellings must include 10% as bungalows.
- 6.64. The proposed draft Local Plan allocations should provide around 1,160 bungalows (31-38% of the identified need). This will allow a balance of the limited land available with other housing needs, such as affordable housing.

### People with disabilities

- 6.65. Across the Local Plan period, the HNA (2021) identifies a need for an additional 2,200 homes to have some form of adaptation with most of this linked to the growth in the size of the elderly population<sup>27</sup>.
- 6.66. The HNA also identifies between 700-1,000 more people will require a wheelchair, equating to an additional 400 households having a wheelchair user, thus requiring appropriate adaptations by 2040. By projecting that forward, 500 households will have a wheelchair user by 2045<sup>28</sup>.

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<sup>26</sup> Canterbury City Council Housing Needs Assessment, p.41

<sup>27</sup> Canterbury City Council Housing Needs Assessment, p.v

<sup>28</sup> Canterbury City Council Housing Needs Assessment, p.v

- 6.67. In the adaptation, design and development of homes, Building Regulations include three key standards for the access and use of buildings and their facilities<sup>29</sup>:
- M4(1) Category 1: Visitable dwellings
  - M4(2) Category 2: Accessible and adaptable dwellings
  - M4(3) Category 3: Wheelchair user dwellings
- 6.68. The 2017 Local Plan requires 20% of homes on major developments and strategic sites to meet the accessibility and adaptable dwellings Regulation M4(2) of the Building Regulations (as amended).
- 6.69. To future proof development, 20% of homes on major developments should continue to be built to at least M4(2). When considering the increasing need for wheelchair accessible homes, as identified in the HNA, it was determined that at least 5% of the 20% should be M4(3) standard<sup>30</sup>. This also supports the council's and KCC's aspirations for more people to be able to remain in their homes for as long as possible.
- 6.70. The Canterbury District Local Plan Viability Study (2022) confirms that 15% M4(2) standard and 5% M4(3) standards are viable on proposals for 10 or more dwellings, or on sites of 0.5 hectares or greater. This has been reflected in the draft **Policy DS2 - Housing mix**.

### People who rent

- 6.71. Around 27% of the district's dwelling stock is privately rented. This is an increase from 19.7% in 2012. This is predominantly due to the large student population.
- 6.72. Between 2020-2040, it is estimated that the number of households that rent privately will increase by between 7% and 16%. This equates to approximately 12% of the total household growth 2020-2040.
- 6.73. No sites were submitted through the call for sites specifically for rental developments.
- 6.74. To support the provision of rental properties **Policy DS2 - Housing mix** seeks to require proposals for more than 300 homes to consider the need for build-to-rent housing in the local area and address it proportionately on site.
- 6.75. The affordable housing tenure split in **Policy DS1 - Affordable housing** seeks 66% of affordable housing to be affordable or social rent which will help meet the overall rental needs.

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<sup>29</sup> [Access to and Use of Buildings: Approved Document M](#), MHCLG, 2015

<sup>30</sup> *Canterbury City Council Housing Needs Assessment, p.53*

- 6.76. In addition, **Policy DS5 - Specialist housing provision** aims to support windfall build-to-rent development.
- 6.77. The HNA (2021) identifies that the future need for private rental accommodation will be more skewed towards 3-4 bedroom properties, and smaller sized units in the older age groups<sup>31</sup>. The market housing mix reflects the need for three bedroom properties allowing the opportunity for the properties to become rental accommodation in the future, if required.

### **Families with children**

- 6.78. The HNA (2021) identified that an additional 477 households will have dependent children over the plan period<sup>32</sup>. This will mainly be in the households with one child, while households with three or more children are projected to decrease.
- 6.79. This means there is a need for 2-3 bedroom properties which is reflected in the housing mix for both market and affordable homes as set out in **Policy DS2 - Housing mix**.

### **Key workers**

- 6.80. Around 19% of the working-age population living in Canterbury are key workers, compared to the South East average of 25%.
- 6.81. Across the South East, the majority of key workers work in the health and social care, and education and childcare sectors.
- 6.82. The HNA did not specify a quantity need figure for key workers. The council considers all workers are important and aims to meet the housing needs of the district as a whole, including key workers.

### **Gypsy and travellers**

- 6.83. The Canterbury district Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) 2018<sup>33</sup> identified a need of 29 pitches between 2017/18 and 2036-37.
- 6.84. Arc4 updated the conclusions in April 2022, increasing the identified need from 29 pitches to **30 pitches** between 2017/18 and 2036/37.

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<sup>31</sup> Canterbury City Council Housing Needs Assessment, p.61

<sup>32</sup> Canterbury City Council Housing Needs Assessment, p.vii

<sup>33</sup> Canterbury District Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2018

- 6.85. A stepped approach to gypsy and traveller needs were identified in the GTAA, and continuing this approach identifies the need for 2020-2045 is **26** pitches.

*Table 6.9: Gypsy and traveller pitch requirement*

	Annual pitch requirement	Total pitch requirement
2017/18 - 2021/22	3.6	18
2022/23 - 2036/37	0.8	12
2020/21 - 2044/45	3.6 for the first 2 years 0.8 for the last 23 years	26

- 6.86. In 2020/21, there were five pitches completed and 12 pitches granted planning permission. This means that a further nine pitches are required by 2045. A five year supply of gypsy and traveller sites will be presented at Regulation 19 stage of the Local Plan production.
- 6.87. No sites were submitted through the multiple call for sites for gypsy and traveller pitches, and therefore no sites have been allocated within the draft Local Plan. However, it is considered that based on the need assessment the pitches are not required until the later stages of the draft Local Plan period to account for population growth over time. The residual requirement is anticipated to come from windfall development, supported by draft ***Policy DS5 - Specialist housing provision***.

### **Self- and custom- build housing**

- 6.88. The HNA (2021) considered the council's self-build housing register and determined that the need for self- and custom-build housing is negligible when considered against the overall housing need figure. Therefore, no sites have been specifically allocated for self-build development.
- 6.89. However, should this situation change in the future, draft ***Policy DS2 - Housing mix*** requires development over 300 homes to consider whether there is an identified need for self-build housing that could be addressed proportionately on site.
- 6.90. Windfall self-build proposals may come forward and draft ***Policy DS5 - Specialist housing provision*** seeks to support these proposals where they accord with a set criteria and the rest of the draft Local Plan.



## **Service Families**

- 6.91. The HNA identified no active barracks or evidence of the Ministry of Defence plans for future expansion, so no issues regarding service families have been identified<sup>34</sup>.

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<sup>34</sup> *Canterbury City Council Housing Needs Assessment, p.vii*

## 7. Meeting the districts employment needs

7.1. As set out in **Policy SS3 - Development Strategy for the district**, the employment needs are:

- Office E(g)(i)/(ii) - **38,480sqm**
- Light Industrial E(g)(iii) - **52,030sqm**
- General Industrial (B2) - **15,270sqm**
- Storage and Distribution (B8) - **66,440sqm**

7.2. The employment land supply components are:

- **Completions:** employment land that was been built out in 2020/21;
- **Extant planning permissions:** sites with granted planning permission which are either under construction or not started, but have not lapsed;
- **Saved allocations from the 2017 Local Plan:** as identified in Section 4 and Appendix B; and
- **Proposed draft Canterbury District Local Plan to 2045 allocations:** as identified in section 4 and Appendix B.

7.3. Table 7.1 identifies the amount of floorspace being allocated by sites for those saved from the 2017 Local Plan and the proposed allocations for the draft Local Plan.

*Table 7.1: Saved 2017 allocations and proposed draft Local plan allocations*

Site name	Policy	Mixed E(g)	General Industrial (B2)	Storage and Distribution (B8)	Total
South Canterbury (Site 1)	Saved 2017 Local Plan Policy SP3	45,000			45,000
Surry / Broad Oak (Site 2)	Saved 2017 Local Plan Policy SP3	593			593
Hillborough (Site 3)	Saved 2017 Local Plan Policy SP3	13,500	5,400	8,100	27,000
Strode Farm (Site 5)	Saved 2017 Local Plan Policy SP3	1,000			1,000
North of Hersden (Site	Saved 2017 Local	1,260	630	1,260	3,150

8)	Plan Policy SP3				
Cockering Farm (Site 11)	Saved 2017 Local Plan Policy SP3	7,716			7,716
Land south of Ridgeway (Site 12)	Saved 2017 Local Plan Policy SP3	3,500			3,500
Eddington Business Park	Draft Policy HB10	25,280			25,280
Altira	Draft Policy HB8	6,800	2,845	1,600	11,245
Hawthorne Corner	Draft Policy HB6	3,267	3,267	3,267	9,800
Former Gas Holder Site	Draft Policy HB7	1,560			1,560
Land at Ashford Road	Draft Policy R9	1,480			1,480
Land north of Court Hill	Draft Policy R16	400			400
Canterbury Business Park	Draft Policy C21			51,400	51,400
6 large proposed allocations	Draft Policy C6, C7, C12, C13, W5 and R1	24,000			24,000
<b>Total</b>		<b>135,356</b>	<b>12,142</b>	<b>65,627</b>	<b>213,124</b>

7.4. As set out in Table 7.2, the draft Local Plan contains **59,146sqm** more mixed E(g) floorspace than the needs identified. This allows for market factors, unexpected delays and unforeseen external factors, as well as providing some market choice on location.

Table 7.2: Employment land supply (sqm)

	Policy SS3	2020/21 net completions	Net committed <sup>35</sup>	Net 2017 allocations	Net draft proposed allocations	Shortfall (-) or surplus
Office E(g)(i)/(ii)	38,480					
Light Industrial E(g)(iii)	52,030					
Mixed E(g)	90,510	8,653	5,647	72,569	62,787	59,146
General Industrial (B2)	15,270	-610	2,710	6,030	6,112	-1,028
Storage and Distribution (B8)	66,440	-217	2,055	9,360	56,267	1,025
<b>Total</b>	<b>172,220</b>	<b>7,826</b>	<b>10,412</b>	<b>87,959</b>	<b>125,166</b>	<b>59,143</b>

<sup>35</sup> Sites with extant planning permission

- 7.5. There is a significant supply of mixed E(g) floorspace. But in accordance with recommendations in the Economic Development and Tourism Study (2022), when proposing large strategic allocations, consideration was given to the extent to which employment opportunities are provided to create sustainable mixed use new communities.
- 7.6. The six largest proposed site allocations all contain a requirement for a minimum of 4,000sqm of business space in their draft allocation policy, supported by a Delivery Strategy. This is to allow future housing delivery to be brought forward in conjunction with new local employment opportunities.
- 7.7. The storage and distribution (B8) sector has specific requirements due to the logistical restrictions, an issue highlighted at para 83 of the NPPF. Businesses in our district requires good transport connections to major roads, ideally the A2 so that they can easily travel into London or to the Port of Dover. The surrounding road infrastructure also has to be appropriate and able to support heavy goods vehicles.
- 7.8. Having reviewed the SLAA submissions only one site was identified as a potential option (as discussed in Chapter 4). However, Canterbury Business Park is within the AONB and the need for storage and distribution (B8) floorspace had to be considered in accordance with paragraph 177 of the NPPF.
- 7.9. There is an identified need in the Economic Development and Tourism Study (2022) and Table 7.2 demonstrates that this cannot be met through completions, committed supply and saved 2017 Local Plan sites or through alternative allocations within the draft Local Plan.
- 7.10. While Canterbury Business Park is within the AONB it is a well established business park and has a strong track record for the delivery of B8 uses, with key attributes such as its close proximity to the SRN. Therefore, in this situation it is considered that this is an exceptional circumstance and the expansion of the existing Canterbury Business Park for storage and distribution (B8) is within the public interest. It is critical however, that the site is developed with a sensitive and landscape-led design approach to minimise and mitigate any adverse impacts.
- 7.11. Only General Industrial (B2) needs have not been specifically met through the floorspace figures in proposed site policies. However, it is anticipated that this will come forward on sites in the supply. For example draft **Policy C21: Canterbury Business Park** allows supporting uses related to the delivery of a viticulture hub. An amount of B2 is therefore anticipated at Canterbury Business Park but an exact amount is yet to be determined.

- 7.12. It is considered that the draft Local Plan provides for all of its employment needs, including a buffer, through proposed allocations and saved 2017 Local Plan site policies.
- 7.13. In addition, new business and employment development at the designated Business and Employment Areas<sup>36</sup> will be supported, and this will provide additional windfall development within the district.

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<sup>36</sup> As set out in draft *Policy DS8 - Business and Employment Areas*

## 8. Meeting the districts retail needs

- 8.1. As set out in **Policy SS3 - Development Strategy for the district** the retail needs are:
- Convenience goods - **414sqm**
  - Comparison goods - **5,290sqm**
- 8.2. Policies in the draft Local Plan support more retail and commercial development in the designated Commercial Areas, city and town centres, local centres and village centres<sup>37</sup>.
- 8.3. In addition, Altira (draft Local Plan **Policy HB8**) is a mixed used allocation which includes approximately 9,000sqm commercial and / or leisure floorspace, and approximately 4,800sqm of mixed business, commercial or compatible uses (such as car showrooms or building merchants) as well as additional employment and business uses and residential units.
- 8.4. Altira is being promoted as a scheme including both convenience and comparison retail floorspace. It would therefore meet the entire need of the draft Local Plan.
- 8.5. Further retail and commercial floorspace has been allocated at the large strategic sites so that sustainable communities can be created with the local community services and facilities necessary. The six largest proposed site allocations all contain a requirement for a local centre including commercial, and local shopping and community uses. This equates to 5,790sqm of commercial floorspace and 2,310sqm of local shopping and community uses floorspace.
- 8.6. The draft Local Plan contains sufficient allocations to meet its retail needs as well as a buffer from the large allocations.
- 8.7. As mentioned in the Retail and Leisure Study Update (May 2022), retail forecasts are unreliable in the long term. As such, the retail needs are also irregular until 2035. Retail forecasts will be kept under review, and as the Local Plan is required to be reviewed every five years, any changes will be addressed at the next Local Plan review.

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<sup>37</sup> As set out in draft *Policy DS10 - Town centres and community facilities*


# Appendices

## Appendix A: Abbreviations

GEA	Gross External Area
GTAA	Gypsy and Traveller and Travelling Showperson Accommodation Assessment
HEI	Higher Education Institution
HMA	Housing Market Area
HMO	Houses in Multiple Occupation
HNA	Housing Need Assessment
KCC	Kent County Council
LHN	Local Housing Need
NPPF	National Planning Policy Framework
PBSA	Purpose Built Student Accommodation
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SHMA	Strategic Housing Market Assessment
SLAA	Strategic Land Availability Assessment

## Appendix B: Summary of SLAA and SA Outcomes

The detailed summary of the SLAA and SA outcomes for each SLAA submission, and calculations of development yield for allocated sites, are available in the following spreadsheet:

 Dev TP Appendix B - Summary of SLAA and SA Outcomes (October 2022).xlsx