

Canterbury Heritage Design Forum

Commentary on Canterbury District Draft Local Plan Reg 18 consultation Sep 2025

V5

INTRODUCTORY

Canterbury Council have issued a limited re-consultation comprising various documents primarily describing revised sites allocated for house building, and calculations of numbers or types of dwelling required. Further consultation on final versions of all the Draft Plan documents will take place in 2026.

We make a number of criticisms of the allocations, N1 (Merton Park) in particular, and call for major readjustments of the proposals which would reduce yield.

It is of relevance that the University of Kent have just signalled their intention to re-apply for the full scale housing scheme on their land (withdrawn from the current CCC document), which if granted in the original form would add 1900 dwellings to the totals, which would have a significant effect on the overall Plan yield of new housing. This would allow sufficient headroom in our opinion to allow the changes we propose to go ahead without breaching the minimum NPPF target numbers.

Context

This is the fourth consultation on sites for the Local Plan Review, the first being in 2022 under a conservative administration, but all have incorporated large increases in house, and in some, substantial new road building.

Since then under a new Labour government and local authority, a new edition of the NPPF has been produced increasing housebuilding targets which become unambiguously mandatory. The net target for Canterbury only increased very slightly.

The Introduction to the 2025 Plan notes that the NPPF assessment is for 1215 dwellings per annum, and the Plan provides site allocations (including allocations from the 2017 Plan and windfall sites etc) for 23,085 dwellings over 19 years.

Restrictions on building in Green Belt Land have been reduced, but this does not affect Canterbury as it has no green belt.

Nutrients

CCC with Ashford BC have signed an agreement with a company who will provide nutrient credits by developing offset nutrient reduction measures elsewhere in the Stour Valley catchment area, eg creating reed beds. The Plan writers assume that there are no outstanding issues on this issue, and does not discuss either this or any other type of constraint - eg: drinking water supply capacity.

For some developments, there is the assumption of an onsite Waste Water Treatment Works, as has been required for South Canterbury Urban Extension. It is worth noting that in that particular case, recent developments show that Southern Water and the site developers are looking at alternative pumped solutions to take waste overland to treatment works outside the Stour catchment. For practical short term purposes, we take the view that waste treatment is not in itself an issue that compromises viability.

Housing Need

Underlying the NPPF housing need figure, CCC have issued a 2025 Revised Housing Needs Assessment which reviews recent trends, and notes that, as asserted by many respondents in the 2024 consultation, the ONS Census figures for Canterbury were overstated, and in additional student numbers actually have dropped by 5000. A gross figure of 695 affordable and social rent dwellings are required per annum. (this would represent of course 57% of all new dwellings, whereas the Plan only requires qualifying developments to provide 30% affordable and social housing).

Development Topic paper and UKC Land (Sites SLA 158C D E F)

The DTP discusses at some length the various difficulties there have been in proving the viability of this site to provide 1900 dwellings, and it concludes very simply by removing all those sites from the Plan. We understand that in fact alternative ways of developing the site to a much lower overall yield have been investigated, which might produce up to 250 dwellings.

Given the severe criticisms we have of the level of development of Merton Park, coupled with the arbitrary inclusion of the new Sports Hub displacing the previously included Park and Ride, for which a replacement site is required, resulting in Thanington Resource Centre losing its playing fields, we suggest CCC need to urgently rework their appraisals to see if after all some housing can be accommodated, relieving the pressure on other sites.

Selective New Evidence

The complete Evidence Base for the current consultation continues to list all the 2024 documents, and some 2022 documents, but only the Draft Plan, the Development Topic Paper, a 2025 Canterbury Retail and Leisure Study and a 2025 Revised Housing Needs Assessment have been released as revised documents.

That is, there are no new transport or environment documents, but transport and environment statements are made in the new documents that depart somewhat from the text of the 2024 documents, which makes interpretation more difficult.

Specifically, the Transport Strategy Mar 2025⁴ claimed at S 4.1 - 4.3. a new transport hierarchy will be implemented on all developments, with Walking and Cycling the presumed most likely and desirable mode and vehicle trips the least likely and desirable. Through imposition of this hierarchy (the means of which are not stated) it is assumed at S5.3 that increased growth will not entail increased vehicle movements. Developers will be required to pay for new bus services or numbers of buses, along with supporting the LCWIP plan with new cycle networks. This fundamentally speculative line of argument is deployed in connection with the major SW Canterbury development site at Merton Park, as we will see.

Summary

The main business of the new Plan is to present new or revised sites that make up for major reductions to the allocations now proposed on the University Site, which is reduced from 1900 dwellings to 250.

We concentrate on the 2025 Plan document supplemented by the detailed commentary in the Development Option Paper that reviews all the Strategic Land Allocation(SLA) sites in some detail.

We start with the biggest single site - SOUTH WEST CANTERBURY Merton Park Policy N1 - N3

Park and Ride, Sports facilities

The Development Option Paper notes a number of initial fundamental adjustments that have been made since the site was first proposed in 2022.

- Land for a new off-slip from the A2 and Wincheap will be provided on land currently occupied by the Ten Perch Road Park And Ride
- A replacement Park and Ride will be provided on land currently occupied by the playing fields at Thanington Resource Centre
- This is required because land will be used within the Merton Park Site on the land previously set aside for the replacement Park and Ride for a Sports complex including sports pitches, to which sports users of Thanington would have to travel.

We note

This seems to disadvantage the current users of Thanington Resource Centre who have used their playing fields for many years, as a part of their local resource centre

The decision to provide a sport hub as a home for Canterbury Football Team seems an anomaly: why is land being provided for use by a small section of the community?

Protection of community and landscape assets

Our major concern however, is the carpeting of the site with housing at 35 d/H density.

Community Asset

The land between the current edge of the city - Limekiln Road/Heaton Road area, and Merton Lane is currently used as fruit orchards, with an established footpath, and is in constant use as a dogwalking and walking area by the community, much as Kingsmead Playing Field off Broad Oak Road was. Local residents successfully protested about the CCC plan to build over the land, and a local campaign is now under way in Wincheap Ward to protest about the loss of this community resource. A Wincheap Orchards Groups has now been set up to pursue the same issues.

Landscape Asset

We objected strongly to this proposal in 2022, quoting the LCA document referenced by the Council, and assert again that the fields running up to the skyline from Limekiln Road path up to the Rugby Club are of equal importance to Area H4 - Nackington Farmlands - for which the recommendation is :

Conserve the rural character of the landscape ensuring that it continues to play a role in providing a rural separation between Canterbury and the outlying villages of Bridge, Patricbourne and Lower Hardres .

These large open fields run down-slope to give excellent views of the Cathedral, and up-slope to the tree belt screening the A2, which forms the effective visual edge to the high land surrounding Canterbury. Their unusual large tree clumps within open arable land, are highly distinctive, and are clearly visible from the University slopes.

Both the SLA assessment and the Policy at 2(f) wording talk about enhancing and preserving the setting of the WHS

Be informed by a Heritage Statement and Heritage Impact Assessment, including an assessment of Areas of Archaeological Potential, and protect and enhance nearby heritage assets, including the setting of the World Heritage Site, in line with Policy DS26. The development layout should be structured and orientated to provide viewing opportunities to the World Heritage Site;

However, the framing of Canterbury itself by green space is as important as facilitating views towards its centre, which clearly could be provided by aligning access roads within a development layout. However, carpeting the site with housing is clearly incompatible with its fundamental character.

Relevant precedents

Durham Urban Design Code recognises explicitly the strong contribution made to the WHS by the framing of the key inner site by the by buffer zone of outer belt of green slopes that run up to the skyline screen

it from the countryside beyond.

Design

Re design generally, we deplore the absence of any mention of use of an agreed bespoke Design Guide for the site.

Transport Impacts

Finally, we believe that the 'upgrading' of Hollow Lane will destroy the special qualities of the ancient hollow or sunken lane profile and habitat, and similarly, the narrow one-way Stuppington Lane cannot be widened without loss of habitat and character - and yet the policy talks about using the hedgerows as pollinator areas.

Transport Assessment

As outlined in the opening paragraphs, CCC have adopted a speculative and unreasonably optimistic view of the potential of modal shift to reduce car travel. The Development Topic Paper states that the original proposal for the site was for two links to the A2 bypass to provide for primary access, reinforced by (undefined) supplementary links via Hollow Lane. Now they assess that the new links are not required, but that Hollow Lane and Stuppington Lane, if 'upgraded', will have enough capacity because an ambitious modal shift scheme will be in place that significantly reduces car travel.

This is irresponsible and risky nonsense. For the South Canterbury Urban Extension similar claims have been made, but the site has not been commenced, no modal shift achieved, so there is no precedent. No details are sketched out as to how such schemes will work: presumably CCC consider it is sufficient to issue a performance specification. Local residents commissioned a professional Transport Consultant to analyse the developers proposals, and found

- (a) the trip rate had been underestimated by using the wrong comparator and
- (b) the methodology was merely aspiration based with no concrete evidence from any existing schemes confirming concrete proposals that have delivered the projected outcomes.

We speculate that the real logic of these moves is that CCC are doubtful that the viability of the site will allow for the cost of providing slip roads, or that the land lost would preclude provision of large sport fields.

Traffic connectivity problems.

Once the unspecified number of cars from Merton Park make their way to Nunnery Fields, they will join the Fast Bus Route vehicles and cars shortcutting the Wincheap / Pin Hill ring road, and contribute to the worsening of the traffic queues that already beset lower Nunnery Fields at rush hour.

CONCLUSIONS - Site N1

CCC must radically revise the development parameters for this large site.

Landscape and community value

Recognise the current values of the site in landscape and community terms, and radically downgrade the proposed density, to provide substantial and connected open green spaces that preserve the landscape and amenity corridors, within the framework of agreed and detailed landscape, open spaces and biodiversity briefs.

Review the Open Spaces Strategy to include community use of green infrastructure in S W Canterbury.

Omit the Park and Ride from the development brief.

Include existing rural roads in the landscape assessment.

Reverse the inclusion of the Sports Hub in the brief.

Transport

Proved a full detailed traffic analysis leading to a range of options for realistically mitigating realistically assessed vehicle impacts, including restoring the proposed links to the A2, and reviewing the cumulative impact of the developments on the existing network of roads through Hollow Lane, Stuppington Lane, South Canterbury Road, Nunnery Fields.

Include air quality impacts in the scope of the assessment.

Reexamine the Ten Perch Riverside Retail Park land use plan, to include the fourth A2 slip without losing the Park and Ride.

Design

Provide a detailed design code for the new development, linked to the evolving new Design Code for Canterbury, dealing with buffer zone landscape matters as well as building design, linked to the Landscape Plan, drawing on appropriate precedents such as Durham WHS Code.

SOUTH EAST CANTERBURY - N4 - N7 Land S of Littlebourne Rd S of Bekesbourne Lane, North of Bekesbourne Lane, Seotamot

N4 Land S of Littlebourne Road (1520 dw @ 35 dph)

This is another very large development that includes a Park & Ride, and a Waste Water Treatment Works (WWTW).

We believe that the Policy should include short but concrete summaries constituting key points of development and design briefs as mentioned above for N1, ie Design Code, Landscape, Open Space (including community access), Bio-Diversity, Traffic Assessment, Nutrients, Green and Blue Infrastructure. The short design /parameters listed in the policy for these key elements are inadequate, and / or vague

In particular we have concerns:

Transport

A link road is shown crossing the railway via a new bridge into the Site N5, and thence into the South Canterbury development, as though that solves a problem. Where is the Transport Assessment showing the impact of this on the new developments, and on New Dover road etc beyond?

Landscape

Any landscape brief must include the need to develop CGI images indicating the intervisibility of new development and the WHS - parts of the western edge of the site will be on the skyline. The brief should adopt the approach used in Durham city Design Code - the skyline ridge is part of the WHS buffer zone.

Pylons

Mountfield Park/South Canterbury site will remove the two medium voltage pylons runs across that site, but the high voltage run that partly crosses this site (N4 - eastern edge) will remain. What is the intention with regard to these HV pylons?

N5 Land S of Bekesbourne Lane 860 dw

As for N4

N6 Land North of Bekesbourne Lane at Hoath Farm 67 dw

This site is entirely enclosed by N4 and N5, - comments for these apply.

N7 Soetamet 14 dw

Comments as for N4 etc apply as appropriate.

URBAN SITES N8 - N9

N8 Millers Field 9dw, at 80dph

In principle we welcome dense development, but in the case of higher urban buildings, their impact on adjoining sites is greater, and the design parameters are more important, so all the requirements we put forward for the larger site apply.

Sites N9 - N18 6 - 21 dw

In principle we welcome urban infill, but in the interests of high quality contextual urban design, our comments above continue to apply, and we call for comprehensive design and transport briefs for all sites.

Site N19 Spitfire Ground - Mixed commercial/leisure.

Kent Cricket Club continue to develop their site, having recently erected a substantial wall of four storey apartments in the east side of the ground, and a low rise development of houses to the north of the ground, which reduced the community benefit of the ground by denying views in to the ground, which limits its functionality as an Open Space.

Canterbury CC Open Spaces Strategy is a short document with limited detail on specific areas, and The Cricket Club is of course not a public access area. However, to whatever degree it is thought to play a part in the public realm. the NPPF is clear that open sports spaces should not be built on (see section 103) but also talks about the importance of Local Green Spaces (Section 1016).

By building along the eastern and southern edges of the ground as shown in the outline plan, occupants of the hospital and of Knackington Road will be deprived of the green views.

The policy makes no mention of community impact , and should be reworded, so that beneficial views into the ground can be maximised to the extent that this is possible without compromising the functional brief. This seems to consist mainly in replacing existing facilities, so might be largely space-neutral, and the extent of new hotel rooms could be restrained so as not to fully enclose the ground.

It is worth pointing out that the cricket club imposes substantially on the community by running loud and bright events until late in the evening throughout the year. It would be un-neighbourly to deprive the community of all enjoyment of the open space.

Tim Carlyle Chair

CHDF 21 October 2025.