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Canterbury City Council
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28th May 2024

SI – 20/145
BY EMAIL

Dear Sir/Madam,

**REPRESENTATION TO THE CANTERBURY DISTRICT LOCAL PLAN REGULATION 18
CONSULTATION IN RESPECT OF MERTON PARK, CANTERBURY (DRAFT ALLOCATION
POLICY C6)**

Iceni Projects, on behalf of Quinn Estates, welcomes the opportunity to submit representations to the Canterbury District Local Plan (Regulation 18 Consultation). Quinn Estates is one of the leading and most prominent developers in Canterbury, with strong ambitions to deliver a sustainable urban extension at Merton Park, Canterbury.

Quinn Estates supports the inclusion of Merton Park as an integral part of the South West Canterbury strategic development area to deliver a residential-led mixed-use development, including approximately 2,250 new dwellings with an appropriate mix in line with Policies DS1 and DS2 to be agreed but including affordable, self-build, accessible and older persons housing, alongside high quality community facilities. This allocation forms part of an impressive and forward-thinking emerging Local Plan for growth in Canterbury District over the next 20 years. There are key advantages of allocating this strategic site which will generate a number of social, economic and environmental benefits through a well-planned comprehensive approach.

As part of the continued development of the emerging Local Plan towards adoption, Quinn are keen to continue engagement with planning officers to discuss key matters and ensure they are evidenced so that the requirements of the allocation can be demonstrated and achieved. In particular, it is acknowledged that there is a wide range of criteria for the site and therefore the ability to deliver these and phase them appropriately will need to be tested.

Separate representations have also been made in respect of the core strategic policies and development management policies included in the Plan including in relation to the wider development strategy, housing, employment, transport and infrastructure, environment and design policies. Whilst these representations focus specifically on the proposed allocation itself, they should be considered in the context of these overarching representations.

Quinn Estates are undertaking ongoing detailed work with their development viability consultants to review the emerging policy requirements and the wider evidence base relating to viability. They will work closely with Canterbury City Council (CCC) ahead of the Regulation 19 stage to ensure the emerging allocation is deliverable and robust and that the societal benefits that the development can potentially deliver can be maximised.

In addition to this letter, the following is submitted in support of the draft allocation:

- Land Use Budget Plan, prepared by Milton Studios;
- Multimodal Access Principle, Initial Traffic Impact Assessment & Sustainable Transport Strategy, prepared by C&A;
- Coopers Pit Regionally Important Geological Site (RIGS) Survey, prepared by Ecologia; and
- Education Landscape Review, prepared by EFM.

The site was previously submitted as part of the Call for Sites process in June 2020 and was supported by a number of technical documents including on matters relating to air quality, trees, drainage, ecology and transport, among others. Representations were subsequently made in January 2023 in response to the previous Regulation 18 consultation, with the site allocated for strategic development in both the previous and current Draft Canterbury District Local Plan. The information submitted as part of these representations should be read in conjunction with that submission but also builds on this with further information to support the site as part of the draft allocation. Quinn envisage working closely with CCC and other key stakeholders following the Regulation 18 consultation ahead of the submission version of the Plan being finalised.

a. Strategic Development Area - South West Canterbury

The Strategic Development Area for South West Canterbury is identified to guide the delivery of new sustainable communities, with a range of key infrastructure and environmental improvements. As well as provision of a mix of uses including new dwellings, business floorspace, local centres, sports facilities and hospital and healthcare facilities, the area is proposed to generate the critical mass required to deliver key infrastructure. The South West Canterbury areas forms one of the key growth areas for the District up to 2045, as set out in draft Policy SS3.

Quinn Estates supports the inclusion of the South West Canterbury Strategic Development Area ('SWC SDA') as part of the emerging Local Plan. It will ensure that a comprehensive approach to development can be delivered that supports the necessary infrastructure, services and facilities to meet both existing and new residents needs within a well-designed setting. This is in line with paragraph 8 of the National Planning Policy Framework (NPPF) to achieve sustainable development through the overarching economic, social and environmental objectives. It also aligns with paragraph 11(a) in relation to the presumption in favour of sustainable development which is at the heart of national policy, to ensure that Local Plans *"promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change ... and adapt to its effects"*.

It is considered that the specific requirements outlined under the SWC SDA are largely in line with what can be delivered across the individual allocations and at Merton Park in particular. However, as part of the next stage of work to develop the Local Plan it will be necessary to test the viability of what the sites can feasibly deliver due to the extensive infrastructure requirements across the development area (as detailed more below). Work is ongoing with BNP Paribas in relation to the site and the draft Whole Plan Viability Study within the evidence base with a view to ensuring the allocation progresses through the Local Plan development in a viable and deliverable form. At present, it is not possible to fully appraise the ability of the site to come forward in line with emerging policy until it is clear which strategic items will be captured by CIL payments, but the conclusion of the preliminary FVA suggests that Merton Park ought to be able to contribute fully to policy compliant planning obligations.

With regard to Merton Park (Policy C6), Quinn Estates acknowledges the Policy's infrastructural requirements to support the SWC SDA, however, believes that the need, timing, funding and viability of each requirement should be informed by a robust evidence-led approach in terms of the need and trigger applicable to it. Two key matters in this respect are (1) whether an initial phase of dwellings would rely upon the delivery of the A2 slip road as part of Part 5 b of the Policy, and (2) the inflexible requirement under Part 5 a to deliver a WWTW on-site when alternative off-site solutions may exist. The need for certain other requirements to serve the SDA, such as the Park and Ride, should be supported by robust evidence to demonstrate a genuine need and viability to deliver this.

b. Policy C6 (Merton Park)

Draft Policy C6 details the criteria for which development of Merton Park will be granted planning permission. This includes details of the development mix (including housing mix and approximate site areas of non-residential uses), design and layout, landscape and green infrastructure, access and transportation and phasing and delivery. This is supported by a concept masterplan of how this could be delivered on the site.

Land Use

As set out above, Quinn Estates supports the inclusion of Merton Park for mixed use development as part of Canterbury's growth ambitions up to 2045. As identified at the Call for Sites stage, the development will generate a number of significant and unique economic, social and environmental benefits to help the District realise its strategic objectives. A Land Use Budget Plan has been prepared by Milton Studios which has built on further technical work undertaken for the site and demonstrates that a scheme that can be delivered in accordance with the land use criteria outlined under draft Policy C6.

Whilst the delivery of infrastructure to support the new community at Merton Park is supported, all requirements should be subject to further evidence base work with CCC, as well as the impact of whole Plan development management policies which have also been applied to the allocation. In particular, this will include further consideration of matters relating to open space, housing mix and biodiversity net gain. Additionally, where evidence can be provided to indicate that such infrastructure would not be required, or would be unviable to deliver, Policy C6 should be amended to have flexibility to allow alternative forms of land use to be delivered.

For example, Part 5 a of Policy C6 outlines a strict need to deliver on-site Wastewater Treatment Works (WWTW) prior to the delivery of any dwellings; however, this has not been informed by evidence such as viability testing or works to demonstrate technical feasibility. As such, whilst the identification of land to deliver an on-site WWTW is supported as a potential way of making the future development Nutrient Neutral, Quinn Estates politely suggest that this element of the Policy is amended so that the development would be required to follow a mitigation hierarchy rather than prescribing the on-site WWTW. This hierarchy would ensure that all potential mitigation measures are considered in a structured way. In the scenario of an off-site solution having been identified, Policy C6 should allow the reversion of land identified for an on-site NN solution to additional residential units, thus ensuring that all parts of the allocation remain deliverable and optimising the best use of land in the most sustainable and strategic locations.

There has long been an aspiration in Canterbury to secure additional Park & Ride (P&R) provision to the west of the City. Currently, the key A2 corridor from the west, including trips from north and west Kent as well as much of the wider country, is not provided for. While a facility exists at Wincheap, this is not accessible from the A2 eastbound due to the absence of a slip-road. Historical proposals to expand the Wincheap P&R were linked to delivery of this missing slip-road. Issues around delivery of an acceptable slip-road design led to cancellation of the P&R proposals. Latterly new proposals for an alternative slip-road have been submitted and remain under consideration. Quinn Estates support the objective for a P&R expansion to serve the A2 corridor, including if necessary by securing alternative slip-road and P&R provision within the Policy C6 allocation. Quinn Estates would however encourage active discussion on whether such alternative provision within C6 is necessary or appropriate, should the original proposals for a fourth slip road at Wincheap be secured – in which case expansion of Wincheap P&R is considered likely to be a more appropriate solution. The Draft Transport Strategy (ref. Table 16.2 p26) provides an appropriate level of flexibility to allow for both outcomes and Quinn Estates would suggest that a similar level of flexibility is afforded to Policy C6.

Further to the above amendments, Quinn Estates politely suggest that the concept masterplan for Policy C6 be amended to reflect the Land Use Plan submitted with this representation, which includes Parcels R07 and R13 for residential development, rather than open space. It is noted that this land has been identified as open space due to the Regionally Significant Geological Site (RIGS, Coopers Pit) in this location. However, as shown in the submitted survey prepared by Ecologia, a large portion of this could accommodate development within the relatively flat portions of the RIGS (Zones 1 and 5

in the report), whilst land raising works and a cut and fill analysis could mean this will also be possible in other areas (Zones 2 and 3). The remainder of the site would be retained as open space as shown (Area P01) and would provide an open space setting to the geological features of interest, namely the cliff face exposures. As such we consider the concept masterplan and subsequent policy criteria should be amended to reflect this position. Given parcels R07 and R13's proximity to the existing built development of Canterbury, it is considered that subject to sensitive design and evidenced safeguarding of the geological interest this change would be beneficial and most appropriate for the masterplan of the wider site. As identified in the initial call for sites consultation, the site is a very sustainable location and therefore the evidenced ability for additional areas of the site to accommodate dwellings should again be given serious consideration.

In addition, the Education Review appended to this representation and prepared by EFM. This document looks at the current and future capacity of schools to that could serve Merton Park and concludes that the provision of a 2FE primary school, favoured by the Department for Education, at Merton Park would be an appropriate mitigation solution and would provide a good balance of provision across the area.

Development Mix, Infrastructure and Phasing

As highlighted in the overarching representations made by Quinn to this consultation, it is necessary to test and evolve as required the draft allocation policy to ensure that all of the detailed criteria will work in practice and thus illustrate that the Plan is deliverable. Where evidence suggests that certain infrastructure is not viable to deliver, the housing allocations for the SWC SDA need to be given flexibility for further residential development to be delivered if other infrastructure items are no longer deliverable or required.

In particular, for Merton Park there are a number of key infrastructure requirements identified which will have space, cost and phasing implications attached to them. To this end, the draft Infrastructure Delivery Plan (October 2022) identifies a number of key pieces of infrastructure to be delivered as part of Merton Park including a new Park and Ride and new slip roads off the A2 into the site as part of the South-West Canterbury link road, as well as a sports hub for Canterbury's rugby and football clubs and a new/improved Kent and Canterbury Hospital. This document will therefore be a key element of the Local Plan and Quinn Estates would be keen to play an active and participatory role in its evolution as it progresses to ensure that these key components of the policy are viable and deliverable. The preliminary FVA and further work undertaken by BNP Paribas on viability to ensure the criteria under Policy C6 are shaped into a deliverable form ahead of the Regulation 19 consultation should assist this. As such, CCC must ensure that all infrastructure for Policy C6 is needed, deliverable and appropriately timed, having regard to the need to deliver dwellings to further fund and support the delivery of infrastructure. Given that these infrastructural requirements are not fully tested from a need or viability perspective, the timing or scope for them to be delivered is not yet confirmed. Acknowledgement to this is given for the hospital expansion identified as part of Policy 5 f, which includes flexibility to release the land for residential development.

For example and as discussed above, the requirements to deliver a Park and Ride and the A2 Slip Roads remain to be established and in large part relate to the delivery or otherwise of earlier proposals for the Wincheap slip and P&R expansion. Furthermore, detailed transport works are currently being undertaken by the promoter and KCC (alongside their consultant Jacobs) which will consider the practicality of and need for delivering these identified requirements. This evidence may conclude that their timing can be delayed, or that they can be wholly removed as they are not required. Critically this evidence gathering is being developed in the context of the emerging Draft Transport Strategy, which itself reflects the key principles of national policy. Delivery and timing of infrastructure, in particular highway schemes, is a key influence on achieving the outcomes of the transport strategy. Unnecessarily early or overprovision of highway infrastructure will be counterproductive to the sustainable travel objectives of the Draft Transport Strategy and national policy. It is therefore critical that the nature and timing of any infrastructure is evidence led. Therefore, to ensure flexibility within the policy, maintain its deliverability, maximise scope to deliver residential developments in the most sustainable possible manner and to ensure consistency with the Draft Transport Strategy, a similar approach to that taken for Part 5 f of Policy C6 should be adopted for all infrastructure requirements identified as part of this Regulation 18 consultation.

Submitted alongside these representations are a suite of initial transport evidence documents. This includes an 'Access Strategy' report that builds on the indicative draft policy and transport strategy requirements, providing additional detail on the practical deliverability of the identified infrastructure components, including the aforementioned new slip roads to the eastbound A2 – should the on-going evidence gathering support the need for such delivery. The evidence is further supported by a Draft Site Specific Sustainable Transport Strategy for C6 which sets out the clear opportunities for a highly sustainable development on site C6, making best use of its exceptional locational and connectivity opportunities in a manner consistent with national and emerging local policy. The sustainable transport document sets the basis for a more progressive and aspirational assessment of potential development impact that will provide a more pragmatic appraisal of the need for and timing of delivery of highway infrastructure. It is considered important that the current policy provides the aforementioned flexibility to respond to the outcomes of that evidence gathering.

Notwithstanding that the flexibility for the release of the hospital extension land in Part 5f of Policy C6 is welcomed, it is noted that there is conflict between the safeguarding of land required at Part 2d of Policy C6 and the requirement to 'provide' the hospital extension prior to 50% occupation of the total number of dwellings at Part 5f. Given the uncertainty around the NHS growth strategy and funding approach in East Kent, it is suggested that the safeguarding of land for the hospital extension in accordance with Part 2d of Policy C6 is echoed throughout the site allocation. This could be time limited as appropriate in line with confirmation being received of the commissioning or otherwise of any expansion of hospital facilities in this location. As a sustainable location for residential growth, it is suggested that the link to residential occupations at Part 5f is removed.

In addition, given the strategic nature of the scheme there will be longer timeframes for delivery and therefore a flexible approach needs to be incorporated to allow for changing demands over this period. It is therefore considered necessary that suitable caveats are included within Policy C6 to acknowledge this, as detailed in Appendix 1 of these representations. This is in line with paragraph 86 of the NPPF to ensure that planning policies are flexible enough to accommodate needs not anticipated in the plan and enable rapid responses to changes in economic circumstances. This is particularly important in light of issues such as nutrient neutrality, whereby mitigation is necessary as part of the Habitat Regulations Assessment and a number of solutions will be required which will need to be viability tested. The utilisation of both on- and off-site solutions, alongside potential investment within the Southern Water infrastructure by 2030, will be a key requirement of a successful policy and needs to be costed to ensure it is deliverable alongside other policy aspirations. Specifically, section (5) of the Policy relating to phasing and delivery sets out certain time triggers for the delivery of key elements of the scheme. However, it is not clear what evidence has been used to determine many of these and if this aligns with finance and occupation triggers that make these timings viable.

Similarly, whilst the overall balance of the different uses is supported, the precise nature of the amounts of these uses within the policy could present further challenges down the line when a planning application is forthcoming that needs to accord with this but that further detailed work has determined cannot allow for all elements to be achieved. The wide range of different uses and infrastructure required for the site also goes hand in hand with a large number of unknowns that will not be known until a later stage for example the level of financial contributions for schools, the fluctuating cost of building materials and, from the current wording of Policy C6, the costs of the new slipways and other highway infrastructure associated with the South West Canterbury Link Road and delivery of the new hospital shell which can have knock-on effects on the feasibility of other elements of the scheme. Similarly, the draft Policy requires compliance with Policy DS2 which specifies a specific housing mix for all development proposals. With regard to affordable housing mix, this is set to be in line with draft Policy DS1, which requires this provision to be split between 66% affordable or social rent, 25% First Homes and 9% other home ownership models. Neither market nor affordable housing mix requirements take into consideration the site-specific elements and vision for Merton Park and therefore it is necessary that a site specific criteria for the housing mix of the site and greater flexibility to respond to market and viability conditions be included under Policy C6 which can be discussed and agreed as part of engagement with CCC officers.

Biodiversity Net Gain and Tree Cover

Quinn Estates are committed to achieving biodiversity enhancements and tree cover at Merton Park and recognise it as a key part of maximising environmental objectives and establishing and protecting

habitats. They are therefore keen to explore how the 20% Biodiversity Net Gain (BNG) and 20% tree cover can both be achieved on the site that also allows for a high-quality layout and form of development to also be delivered. Significantly, woodland scores very poorly in the BNG metric, and as such these individual requirements may run contrary to one another and result in the unintended effect of reducing developable land to meet needs and impact the viability of delivering development on the site.

Quinn Estates consider that the provisional requirement for every development in the District to deliver 20% BNG and tree cover may be challenging in some scenarios, particularly given that the requirement to deliver BNG has only recently been introduced and the biodiversity value across the District is varied. The National Planning Practice Guidance (ref. 74-006-20240214) states that plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.

To this end Aspect Ecology have reviewed the likely initial BNG calculation for the site based on the existing baseline and the proposed development. This confirms that delivering such a significant net gain in biodiversity on-site appears to be challenging and has the potential to require extensive off-site enhancement that at present is under third party ownership. This therefore creates challenges for deliverability and whilst the draft policy allows for off-site BNG provision, the cost of doing so needs to be considered for the site viability. Quinn are therefore keen to engage with officers to further discuss this and how it can most effectively be delivered. This should consider whether a qualitative approach to biodiversity gains to maximise opportunities for a range of species should dovetail with the quantitative measure of the biodiversity metric for the site and whether setting site specific parameters for both within the policy criteria could achieve the best outcome for nature and wildlife.

In addition, although it is acknowledged that tree cover does enhance the appearance and quality of a development, Quinn would seek further discussion on the 20% tree cover figure, as also noted in draft policy SS1, in relation to how this can be achieved and how the benefits the Council are seeking can be realised. In particular, there may be other ecological enhancements which could achieve similar or improved benefits without the same land take and therefore may be worthwhile considering.

Community Infrastructure Levy

Having considered the CIL Charging Schedule, which currently applies the Council's proposed standard CIL rate to Policy Allocation C6, Quinn Estates are concerned that the requirements for CIL will inhibit the aspirations to deliver the significant amount of infrastructure requirements under this Policy. The Viability testing for the CIL Charging Schedule identifies the viability challenge of other strategic sites as part of the SWC SDA, namely Land North of Hollow Lane (Policy C7), given the extent of the infrastructure being delivered through these sites. Subsequently, a nil/zero CIL rate has been applied to these sites and alternatively, all infrastructure contributions will be secured through a more bespoke S106 Agreement.

BNP Paribas Real Estate has undertaken a high-level Financial Viability Assessment ('FVA') in respect of Land at Merton Park under Policy C6, giving due regard to the requirement to provide extensive strategic and community infrastructure in the context of CIL and wider developer obligations. Whilst it has been possible to financially model the viability of Merton Park to a certain extent, it is not possible to fully appraise the ability of the site to come forward in line with emerging policy until it is clear which strategic items will be captured by CIL payments, and which will be delivered directly by the developer. Unlike other strategic sites in the district, including Mountfield Park, Merton Park is not currently zero-rated for CIL despite Policy C6 requiring extensive strategic and community infrastructure such as a Community Hub, Sports Hub, Park & Ride Facilities and off-site highways improvements.

The conclusion of the preliminary FVA suggests that Merton Park ought to be able to contribute fully to policy compliant planning obligations, but no firm position can be given until the package of developer contributions under S106 and CIL is provided. There will become a point where the strategic and community infrastructure burden becomes unduly onerous and that is certainly the case with any

obligations around the provision of a new hospital extension and associated facilities on a site of approximately 6 hectares within Merton Park.

Quinn Estates recognise the approach being taken to these strategic sites and consider the zero-rating of the strategic sites to be an appropriate and necessary measure that will be central to securing delivery of the most important strategic sites in the Borough that are at the heart of the Borough's spatial strategy. However, the same equally applies to Merton Park site, especially given that it forms part of the same SDA as another CIL-exempt allocation.

Merton Park is not a conventional development site owing to the significant amount of infrastructure provision identified and the challenges of delivering the site which are not reflected in the CIL Charging Schedule. It is therefore considered to be justified, appropriate and necessary to exclude Draft Allocation C6 from the CIL regime, as is the case for Draft Allocation C7, to enable a more tailored S106 to be established that will be more effective in securing the infrastructure needed to mitigate the development and deliver the District's development strategy.

If the Council is not willing to remove Draft Allocation C6 from the charging schedule, then Quinn Estates consider that other infrastructure needs beyond the site requirements should be agreed with CCC as Payment in Kind.

c. Next Steps

There is a significant amount of work that needs to be undertaken through the Plan process and in particular ahead of the Regulation 19 stage to ensure that a prescriptive policy allocation for Merton Park is deliverable and ensures that an application in accordance with this can be approved.

Viability is an important part of the evidence base at this point particularly given the commitment to identify and maximise the societal benefits the development can potentially deliver and as highlighted BNP Paribas are already undertaking work to assess the viability position of the Plan to support this. The extent and range of social and environmental infrastructure is significantly more than a development of this nature typically provides and therefore raises financial queries that need to inform the policy. Moreover, the need, timing, and deliverability of such requirements must be subject to detailed and robust evidence to optimise the deliverability of the overall allocation. The policy requirements must be given full consideration and stress tested using viability assessment to ensure that the policy is deliverable. Important work in this respect is already being prepared that will inform the need and trigger for significant A2 Slip Roads and the Park and Ride. As noted earlier, this work is being prepared in cooperation between CCC, the promoter and KCC (alongside their consultant Jacobs). The evidence being developed looks specifically at how development at Policy C6 can best achieve the objectives of the Draft Transport Strategy and national policy, namely to facilitate and promote sustainable travel. Included in the representations are a suite of initial documents from that form an early part of that work. Importantly this includes a draft site specific Sustainable Travel Strategy for development on Policy C6. This demonstrates the huge opportunity for promotion of exemplar sustainable development on Site C6 and provides a vision for sustainable travel that looks to maximise alternatives to the private car. That evidence provides an invaluable insight into inherent potential in this allocation – using the established and emerging evidence base to demonstrate how, with suitable interventions, the vast majority of journeys to and from the development can be by sustainable modes. That evidence reinforces the need to balance the delivery of highway infrastructure carefully, to ensure that doing so, potentially unnecessarily or too early, will not be counterproductive to the objectives. This work forms the foundation of on-going evidence gathering on the residual traffic implications of the highly sustainable development and critically thereafter, the need for and/or timing of delivery of highway infrastructure.

Whilst Quinn Estates is completely committed to delivering a transformational development that maximises the societal benefits for the wider City and creates an outstanding place to live, work and visit, the development must be deliverable. This could necessitate amendments to some elements of the infrastructure requirement to ensure that viability indicates that the development be delivered.

The below elements should be considered and reviewed in acknowledgement of the fixed area of the site allocation:

- **Social infrastructure:** including (but not limited to) the football and rugby clubs, Park & Ride, new A2 slip roads and hospital extension. The benefits of these will extend to the wider City population.
- **Environmental infrastructure:** including a wide range of open space to benefit the new residents and nearby existing population.
- **Other Local Plan policy requirements:** including 20% biodiversity net gain, 20% tree cover, net zero operational carbon emissions and the fixed housing mix including 30% affordable housing.
- **Other application requirements:** CIL and other S106 obligations.

This is also detailed in Appendix 1 of these representations.

d. Summary and Conclusions

Quinn Estates strongly support the inclusion of Merton Park as an allocation for mixed use development and as part of the South West Canterbury strategic development area within Canterbury's emerging Local Plan to 2045. It is considered this is an ambitious and visionary Plan which facilitates the provision of a number of key pieces of infrastructure that the district desperately needs that can be facilitated through the development benefits of new housing. Quinn Estates is committed to working closely with CCC, other landowners and consultees to ensure the policies for South West Canterbury enable the delivery of sustainable development of the highest quality.

Whilst Quinn support the overall provision of uses proposed for Merton Park, they are keen to facilitate active engagement with the Council and secured increased flexibility to meet the changing demands over the period of a strategic development at this scale and ensure that a scheme which is deliverable in this highly sustainable and strategically important location can be achieved. Given the strategic nature of the site, it is clear that there are a number of moving parts and achieving a balance between the uses, infrastructure needs, ecological enhancements and phasing requirements is a careful balance which needs to be tested and refined through the Local Plan process.

Should the Council wish to discuss any or all of the issues raised in these representations, please do not hesitate to contact me.

Yours sincerely,

Nick Searles-Pellegram
Planner

APPENDIX 1 – CONSIDERATIONS OF DRAFT POLICY C6

Flexibility should be provided for each infrastructural requirement to respond to market conditions.

Subject to viability testing

Flexibility should be provided for each infrastructural requirement to respond to market conditions.

Site C6 is allocated for a comprehensive mixed use development. Planning permission will be granted for development which meets the following criteria:

1. Development mix
Across the site the development mix will include:

- (a) Approximately 2,250 new dwellings including affordable housing, older persons housing, accessible housing, self building housing and an appropriate housing mix in line with Policies DS1 and DS2.
- (b) Non-residential development:
 - (i) Provision of a new hospital extension and associated facilities (approximately 6ha);
 - (ii) Provision of new Sports Hub for the City (approximately 6.67ha) to include:
 - (1) New and improved rugby club facilities (to include re-provision of the existing number and size of pitches as a minimum); and
 - (2) A new football stadium (Category C (Step 3) FA graded ground as a minimum).
 - (iii) Provision of a new Park and Ride facility for a minimum of 500 spaces (approximately 1.5ha), with cycle parking provision and dedicated bus lane connection to the fast bus link;
 - (iv) Provision of a community hub as focal area for the community containing a mix of uses including:
 - (1) Local centre including commercial (minimum 1,500sqm) and local shopping and community uses (minimum 600sqm);
 - (2) Business space (minimum 4,000sqm) including flexible working space; and
 - (3) A mobility hub to serve residents and businesses.
 - (v) Provision of a new 3FE Primary School with early years provision (3ha), located adjacent to the community hub;
 - (vi) Improvements to the existing Lime Kiln Road play area;
 - (vii) Provision of a new high quality waste water treatment works at an appropriate location within the site, or in combination with Site C7; and
 - (viii) Proportionate land and build contributions towards early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure.
- (c) Open space: on-site open space, which includes the new football stadium, will be provided in line with Policy DS24 and should:
 - (i) Be provided in addition to the retention of the existing amenity space at Lime Kiln Road (0.36ha) and the existing Stuppington Lane Green Corridor; and
 - (ii) Ensure that NEAPs and destination play facilities include a new skatepark of at least 0.15ha.

“...or alternative onsite solution to achieve the same nutrient budget.”

Engagement with officers in relation to the provision of these elements and flexible and alternative models for delivering them should be discussed

2. Design and layout

The design and layout of the site should:

- (a) Be developed with garden city principles and be in accordance with a masterplan and detailed design code, demonstrating a comprehensive approach to development, long-term management and stewardship. Masterplans should coordinate with proposals for neighbouring sites where appropriate, including Site C7 and Sites 1 and 11 in Policy CF1;
- (b) Create a complete, compact and well-connected neighbourhood, where everyday needs can be met within a 15 minute walk or short cycle, to support the local economy, to promote health, wellbeing and social interaction and to address climate change by reducing car dependency;
- (c) Provide a high quality built environment, in line with Policy DS6, with an average net density of around 45 dph outside of the community hub. Higher density development will be encouraged in the central and northern parts of the site, closer to the city centre and Wincheap and within and around the community hub;
- (d) Safeguard land for a new hospital in the north-eastern part of the site, adjacent to the existing hospital;
- (e) Retain and enhance the existing rugby club facilities or ensure re-provision and enhancement of rugby club facilities in a suitable and accessible location within the site;
- (f) Create a new mixed use community hub as an easily accessible focal point of the development in the format of a high street or village/ town square containing flexible outdoor space to use for community events, with pedestrians and cycles prioritised. A "Changing Places" facility and accessible kitchen should be provided within the community facilities;
- (g) Assess Areas of Archaeological Potential and protect and enhance nearby heritage assets, including the setting of the World Heritage Site;
- (h) Older persons housing should be located within the community hub, taking account of any specific identified needs;
- (i) Mitigate any adverse noise impacts from the adjacent A2; and
- (j) Provide a Minerals Assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations.

3. Landscape and green infrastructure

The green and blue infrastructure strategy for the site should:

- (a) Provide a comprehensive, coordinated and multi-scale sustainable urban drainage network, including a linear park with integrated SUDS components running through the development using the existing valley formation running through the centre of the site;
- (b) Provide 20% biodiversity net gain, in line with Policy DS21;
- (c) Assess the site's potential to be functionally linked land for golden plover, in line with Policy DS17;
- (d) Retain substantial areas of the existing tree cover and incorporate opportunities for landscape and

This requires viability testing and a flexible approach in light of other site requirements

biodiversity enhancements identified within the Local Character Area H4: Nackington Farmlands set out in Canterbury Landscape Character and Biodiversity Appraisal;

- (e) Provide the majority of the natural and semi natural open space at the southern boundary of the site to provide a substantial landscape buffer and contribute towards noise mitigation from the A2;
- (f) Provide the new allotment pitches adjacent to the existing Wincheap allotment site to the north;
- (g) Retain and enhance elements of historic landscape including field boundaries, hedgerows, footpaths and lanes, and incorporate these where possible and appropriate into the design and layout of the development;
- (h) Incorporate parts of existing orchards for their landscape, biodiversity, historic and social value, where possible and appropriate, into the layout of the development;
- (i) Retain existing hedgerows, trees and vegetation at Cooper's pit RIGS. The site should be incorporated into the wider Green Infrastructure and / or Open Space Strategy and enhanced;
- (j) Enhance the existing Stuppington Lane green corridor and provide further habitat, pollinator and ecological connectivity across the site and with the surrounding landscape, including enhancements to the potential habitat connectivity offered by the disused Elham Valley Railway line to the north of the site and Priority Habitats;
- (k) Preserve and enhance views towards the City and World Heritage Site with provision of viewing corridors from

open space and PRowS crossing the site;

- (l) Provide a landscape buffer to the elevated areas to the south of the site to reduce visual and landscape impact of the development. Visual integration of development edges should be provided to transition the surrounding rural dip slope landscape, and ensure that the surrounding landscape continues to play a role in providing a rural separation between Canterbury City and the outlying settlements of Bridge, Patrixbourne and Lower Hardres; and
- (m) Conserve or enhance the PRow network across the site ensuring key views from the network are protected and that the walking, cycling and PRow network provides multiple benefits such as being designed as part of ecological corridors.

4. Access and transportation

The access and transport strategy for the site should:

- (a) Provide safe and convenient pedestrian and cycle connectivity including:
 - (i) New and improved walking and cycling connections to A28 Wincheap and Great Stour Way via Hollow Lane, Birch Road and Victoria Road;
 - (ii) New and improved cycle connections to the city centre and South Canterbury development (Policy CF1) using the fast bus route;
 - (iii) New and improved cycle connections to Canterbury East station;

- (iv) New and improved walking and cycling connections to school locations, both within the site and surrounding communities;
- (v) New and improved walking and cycling connections to the wider countryside to the south and south-east;
- (vi) A direct cycle greenway between proposed Site C7 and the Kent and Canterbury Hospital; and
- (vii) Improvements to the PRoW network crossing and around the site as required.

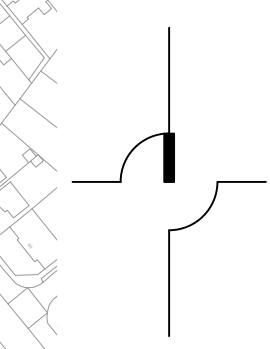
5. Phasing and delivery

- (b) Provide improvements to Canterbury East Station to include facilities for cycle parking and passenger flows;
 - (c) Provide new access from and to the coastbound A2 carriageway to serve the site and provide vehicular connectivity to Site C7;
 - (d) Provide new Park and Ride facilities containing a minimum of 500 car parking spaces, located on the eastern side of the site to connect to the fast bus link and the Sports Hub and incorporating cycle parking provision;
 - (e) Provide a dedicated fast bus link connecting Nackington Road and South Canterbury Road;
 - (f) Provide a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars; and
 - (g) Convert Stuppington Lane within the site to non-motorised/ recreational use/ access only, in combination with opportunities for similar changes with other historic lanes around the site.
- (a) Waste water treatment works should be delivered at the earliest possible stage in the development.
 - (b) New access from the A2 should be delivered prior to occupation of any dwellings. Connectivity to Site C7 Hollow Lane should be provided prior to occupation of 25% of the total dwellings.
 - (c) The Park and Ride facilities, including the fast bus link to the A28 Wincheap via Hollow Lane, should be delivered prior to the occupation of 50% of the total dwellings.
 - (d) The Local Centre, including commercial and community space, must be delivered prior to occupation of 25% of the total dwellings.
 - (e) The business space should be provided as fully serviced land prior to the occupation of 50% of the total dwellings together with a robust Delivery Strategy.
 - (f) The hospital extension must be provided prior to the occupation of 50% of the total dwellings. Should the NHS choose not to proceed with the Canterbury hospital option then the land would be available for residential development and supporting infrastructure, to complement the overall site masterplan.
 - (g) The primary school site must be transferred to KCC at 'nil consideration' and fulfil KCC's General Transfer Terms, prior to the occupation of 100 dwellings.
 - (h) The Sports Hub should be provided prior to the occupation of 25% of the total dwellings. At no time should the Rugby Club facilities be lost from the site; the new facility must be operational prior to redevelopment of the existing rugby club facilities.

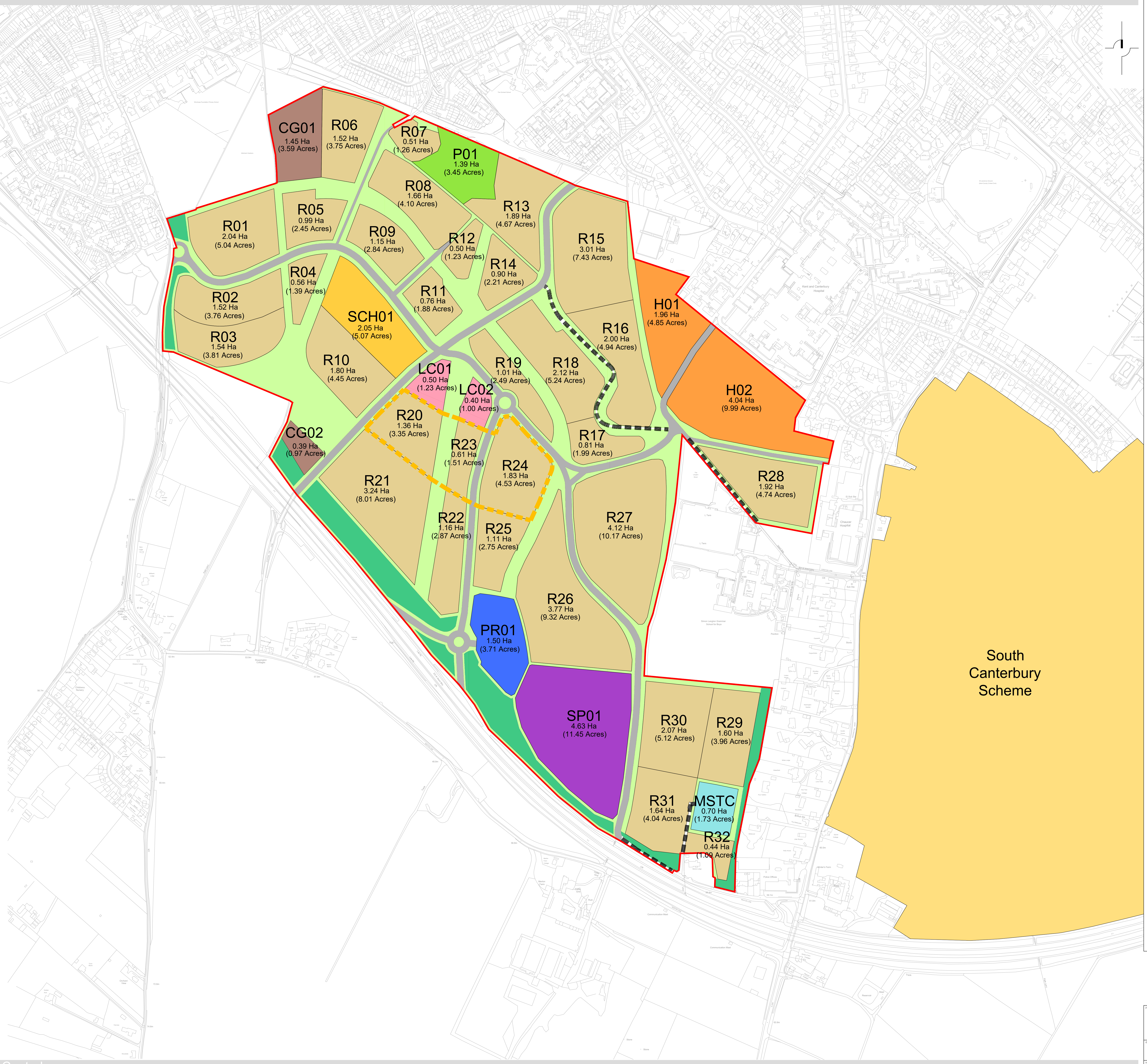
This needs to be tested from a viability perspective. The timing of the delivery of the slip road versus the delivery of any dwellings needs to be considered.

A flexible approach to these phasing timescales should be included in light of unknown elements and longer timescales of delivery of the site.

As referred to in the main representation, it is suggested that the 50% occupation restriction should be removed and the safeguarding of hospital expansion land should be time limited.



Key	(Overall site)
	Development Boundary (99.07 Ha)
	Residential (51.16 Ha)
	Local Centre & Mixed Use (0.90 Ha)
	School (2.05 Ha)
	Hospital (6.00 Ha)
	Sports (Rugby / Football Club) (4.63 Ha)
	Park and Ride (1.50 Ha)
	Kent MS Therapy Centre (0.70 Ha)
	Landscape Buffer (4.50 Ha)
	Amenity Green Space (16.13 Ha)
	Play Area (2.70 Ha)
	Community Gardens (1.84 Ha)
	Parkland (1.39 Ha)
	Indicative Infrastructure (5.07 Ha)
	Indicative Existing Infrastructure (0.50 Ha)
	Older Person Living
	South Canterbury Scheme



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Prepared by: Quinn Estates
Proposed Development, Land at Merton Lane, Canterbury

Project No: Land Budget Plan

Scale: 1:2500 @A0
Date: June 2022
Drawing Number: 2937-313 N