



# UNION 4 PLANNING

## **Telereal Securitised Properties GP Limited**

Becket House, 2-6 New Dover Road

### **WRITTEN REPRESENTATIONS**

to the Reg 19 Consultation on the Draft  
Canterbury District Local Plan

**May 2024**



UNION4  
PLANNING

## Document Control

**Project:** Becket House, 2-6 New Dover Road

**Client:** Telereal Securitised properties GP Ltd

**Job Number:** U0395

**Author(s):** Vivienne Goddard

**Checked By:** Steve Fidgett

**Date:** May 2024

**Revision:** 01

1-2 Paris Garden | London | SE1 8ND  
0207 122 0094  
planning@union4.co.uk  
www.union4.co.uk

## **Contents**

<b>1.0</b>	<b>Introduction .....</b>	<b>2</b>
<b>2.0</b>	<b>Planning Application .....</b>	<b>3</b>
<b>3.0</b>	<b>Issues Related to Allocation C13 .....</b>	<b>4</b>
<b>4.0</b>	<b>Summary .....</b>	<b>7</b>

## 1.0 Introduction

- 1.1 Union 4 is instructed by its client, Telereal Securitised Properties GP Ltd ("Telereal"), to prepare and submit representations to Canterbury City Council's ("the Council") Reg 19 Consultation on the 'Publication' draft Local Plan to 2045. In parallel we also submit the Draft Local Plan Phasing Pro-forma which sets out how the site will be progressed and the timeframes for delivery of the site.
- 1.2 Telereal is the site owner and developer for the site at Becket House, 2-6 New Dover Road, Canterbury. The site is an allocated site for residential development within the emerging Local plan. The site was initially allocated (C17) in the Regulation 18 Draft version of the emerging plan. The allocation now C13 has been carried forward into the Regulation 19 Publication draft.
- 1.3 This submission follows previous representations that were made to the Regulation 18 draft local plan in January 2023. Since this time development proposals for the site have been progressed and a planning application for the redevelopment of the land to the rear of Becket House has now been formally submitted.
- 1.4 The allocation of the site for residential development and the recognition that this site has no future as a commercial site is fully supported. Previous representations raised objections to several of the development parameters set out within the Regulation 18 allocation C17 including development density figures. It is considered that C17 did not support the identified strategic aspirations for optimising urban sites and was contrary to the objectives of NPPF to promote an efficient use of land in meeting the need for homes.
- 1.5 These latest representations relate to the amended Allocation C13. This submission is supported by the following plans:
- Site location Plan – 22.012 0001.000 p Rev 4;
  - Proposed Site Plan- 22.012. 0100.000 p Rev 13;
  - Block A Proposed Ground Floor Plan – 22.012 0201.000 P Rev 6;
  - Landscape Master Plan -14884A-30-I01-05; and
  - Completed Draft Local Plan Phasing Pro-Forma 2024.
- 1.6 The above plans were submitted as part of the planning application and demonstrate how this allocation can come forward and how it can provide a significant contribution to housing delivery.
- 1.7 We are aware that that in additional to the Regulation 19 consultation process the council are also separately reviewing the phasing assumptions made for all draft allocations. The completed Draft Local Plan Phasing Pro-Forma 2024 confirms that expected delivery of housing on the site within the next 5 years thereby providing a substantive contribution to housing delivery in the initial stage of the plan period.

## 2.0 Planning Application

- 2.1 Planning permission is sought for the “*Redevelopment to provide two residential buildings (Use Class C3) providing 54 flats together with 15 townhouses, landscaped gardens, amenity space, car and cycle parking, access and associated works and demolition of existing TRS building*”.
- 2.2 The redevelopment will provide a total of 69 new homes, providing 4x1 bedroomed units and 50x 2 bedroomed units. There would be 15 family houses (6 x3 beds and 9x 4 beds). Each flat has private amenity space in the form of a balcony and the houses have rear gardens of circa 58sqm. The flatted blocks overlook a multifunctional communal greens space. This provides a total of circa 3027 sqm of multifunctional communal greenspace comprising landscaping and amenity space.
- 2.3 The delivery of communal green space has been central to the design approach for the site. It has been specifically designed as multifunctional space including trees and landscaping to maximise biodiversity together with amenity space incorporating seating, green landscaped areas, and child’s plays space. The design integrates the play space into the wider spaces include features such as logs for climbing, stepping stones and boulders while much of the remaining landscape is also ‘playable’, with extensive areas of lawn for balls games and seating for parents. The intension is not to have distinct ‘zones’ but for the space to be multi-purpose.
- 2.4 The proposals show two residential blocks siting perpendicular to the main Becket House with 15 townhouses are laid out in two perpendicular terraces, following the line of Ersham Road and Flagstaff Court.
- 2.5 The proposed for the development will comprise a total of 74 car parking spaces for 69 residential units.
- 2.6 Becket House itself is outside the application boundary and already benefits from an extant prior approval (Reference CA/21/01835) for 42 residential units. Becket House is also subject to a current prior approval (Reference CA/2400795) for a revised layout of the 42 units.
- 2.7 The two submissions are standalone applications to be considered on their own merit. However, the intention is to bring forward two schemes that together deliver a holistic development that can be read and function as a single residential scheme creating providing a total of 109 new homes with a mix of smaller units as well as family homes set around approximately 3,000 sqm of multifunctional communal green space. Achieving a new place and a sense of community, and fully maximising the potential of this highly accessible urban site.

### 3.0 Issues Related to Allocation C13

#### Density

- 3.1 The emerging site allocation C13 continues to identify a density of approximately 67 units across the site. Taking into the existing 42no units permitted for Becket House this allows a further circa 25 units. As identified in the previous representations. This equates to a density of 60 u/hr which is significantly lower than the "at least 80 dwellings per hectare" identified in emerging Policy DS6. This figure therefore conflicts with the aspirations of Policy DS6 which seeks an increasing need to deliver housing in sustainable urban locations that make the best use of urban land.
- 3.2 It is however acknowledged that to date no detailed design justification has been provided to demonstrate the higher densities that can realistically be achieved on site. The current figure, likely based on historic 2015 proposals, suggests the site coming forward for larger houses. Since this time the market has changed with the increased demand for smaller flatted developments in the urban area. There is also a greater policy emphasis on making the most efficient use of underutilised previously developed sites. The site is in a transitional location between the town centre, with the higher density flatted development of Copperfield Court and Flagstaff Court adjoining to the northeast and the lower density larger detached houses to the southeast along Ersham Road.
- 3.3 The application plans show two flatted blocks stepping down away from Becket House with a part 4 storeys, part 3 storeys and part 2 storey element. This maintains the dominance of Becket House whilst seeking to match the lower rise residential development that surrounds the site on Ersham Road and Flagstaff Court. The stepped approach to the massing leads down to the townhouses at the rear of the site. The townhouses are laid out in two perpendicular terraces, following the line of Ersham Road and Flagstaff Court.
- 3.4 Based on this site being 1.1 hectares the 111 units created by both Becket House and the redevelopment would equate to a density of 105 units per hectare. This can be compared with the residential development of the adjoining Copperfield Court and Flagstaff (CA//03/00539) which when approved provided 62 units, comprising 42 flats and 20 houses. This site is approximately 0.4 hectares which equates to 155 units per hectare.
- 3.5 It is considered that based on its location and surrounding context flatted development on site would be fully appropriate. The application drawings show how this can be appropriately achieved within the surrounding context.
- 3.6 We therefore reiterate that the site can achieve a greater quantum of housing including flatted development which is appropriate to its central location. Indeed, the wording of the allocation states that "*the applicant should consider if there are opportunities to increase the density to make efficient use of the land*" (criterion 2). This seems to be contrary to the current density figures.

- 3.7 **It is therefore suggested that Allocation C13 Becket House is amended to specifically include the potential for flatted development with an approximate capacity of 111 dwellings.**

### **Landscape and Green Infrastructure**

- 3.8 A fundamental part of proposals has been the delivery of a multifunctional area of open space that includes amenity space and landscaping that incorporates green and blue infrastructure. The proposals deliver a substantive biodiversity net gain well in excess of the emerging 20% requirement. However, we continue to object to the blanked requirement for the delivery of a minimum of 20% biodiversity net gain as set out in emerging Policy DS21 *Supporting Biodiversity*.
- 3.9 Planning Practice Guidance 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*" (Paragraph 006 Reference ID: 74-006-20240214).
- 3.10 We recognise that Kent County Council has produced the *Viability Assessment of Biodiversity Net Gain in Kent -Final Report* (June 2022) which assesses the high-level viability of a range of development typologies at 10%, 15% and 20% BNG targets and that the Council have produced their own evidence base *Local Plan Viability Study* (May 2022).
- 3.11 The viability Report submitted with the planning application provides a site specific assessment which concludes a significant issue with the proposed development providing a policy level of affordable housing. We therefore question assumption that a blanket 20% BNG requirement could be achieved on all sites without impact on viability and therefore the delivery of a site.
- 3.12 We maintain our view that Under Policy DS21 sites in the urban area should have the lower statutory 10% BNG requirement in line with national planning policy.

### **Access and Transportation**

- 3.13 Site Allocation C13 is in a highly accessible location and will provide the maximum connection to existing walking and cycle networks. Notwithstanding this the delivery of a viable scheme requires the delivery of some element of parking provision. The removal of the 'car free' requirement for the site is therefore welcomed.
- 3.14 The application scheme provides a reduced parking provision 0.85 spaces per unit (which accords with the maximum standards set out in Appendix 4 of CCC's Adopted Local Plan 2017) and is considered to be commensurate with the location and type of units being delivered.

- 3.15 It is therefore considered that the allocation should ensure adequate parking provision consistent with the location and mix of homes proposed with on street parking controls introduced where necessary.
- 3.16 Allocation C13 introduces the opportunity of new walking/ cycle connections through the site from Ersham Road to Oaten Hill. At this stage the scheme does not access through the site. This was one of the main issues of contention that came out of the public consultation event that took place on the 29 November 2023. The majority of respondents did not want access via Ersham Road.
- 3.17 As part of the approved Mountfield/ South Canterbury scheme for 4,00 new homes (Planning Reference 16/00600) a number of mitigation measures/ are required on the local highway network which will include a cycle lane along New Dover Road. It light of this future infrastructure and the overall resistance locally it was decided not to include such connectivity through the site.



## 4.0 Summary

- 4.1 These representations have been produced by Union4 on behalf of Telereal Securitised Properties GP Ltd in response to Cambridge City Council's consultation on the Regulation 19 'Publication' draft of the Local Plan 2020 -2040. Telereal is the site owner and developer for Becket House, 2-6 New Dover Road (Allocation C13).
- 4.2 The landowners are fully supportive of the residential allocation of the site and its continued inclusion within the Regulation 19 plan. It is however considered that further changes could be made to the allocation to ensure that the most efficient use is made of this urban site.
- 4.3 The following suggested wording amendment relates to Site Allocation C13. Representations to other policies referred to in the Regulation 18 draft are not duplicated here but are taken forwards.

### Site Allocation C13- Becket House

- 4.4 Policy C13– Becket House to be amended to read as follows with suggested amendments in red and bold.
- 4.5 Site C13 is allocated for residential development. Planning permission will be granted for development which meets the following criteria:
- 4.6 **Development Mix** -Across the site, which measures 1.11 ha, the development mix will include:  
(a) Approximately **111** new dwellings:
- 4.7 **Design and Layout** - The design and layout of the site should: (a) Provide conversion of Becket House into apartments, or new build if conversion is not feasible, and provide an appropriate mix of types of homes **which could include either flatted development or dwelling houses** to the remainder of the site. The applicant should optimise the density of development on this central location to make efficient use of the land; and
- 4.8 **Access and Transportation-** A) Support active travel by facilitating safe and convenient walking and cycling connections **where appropriate.**