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### Canterbury City Council Local Plan Representation – Regulation 18

Site: Land at the former Chaucer Technology School

Prepared by: Galliard Homes Ltd

Date: June 2024

#### 1.1 Introduction

- 1.1.1 This representation has been prepared on behalf of Galliard Homes Ltd (hereafter, 'GHL') in response to the Canterbury City Council Draft Local Plan 2040 Regulation 18 consultation which runs until 3<sup>rd</sup> June 2024.
- 1.1.2 The City Council has published the Regulation 18 version of its Local Plan review. The Council currently anticipates the Regulation 18 consultation to run until June 2024, with the Regulation 19 stage following between July 2024 – May 2025, submission and examination between June 2025 – January 2026, and finally adoption in March 2026.
- 1.1.3 The former Chaucer Technology School is owned by Kent County Council who promoted the site for redevelopment through a previous Regulation 18 consultation in January 2023. GHL have expressed an interest in developing the site and as such are submitting this representation ahead of agreeing a purchase or development agreement. The site was submitted as part of the Call for Sites exercise in June 2020 and remains immediately available for development. The site has been included as a draft allocation for residential development under Policy C15. GHL wish to limit their comments at this stage to the proposed nature of the allocation, in terms of the type and tenure of development proposed. Specifically, GHL wish for Policy C15 to allow the site to come forward for student housing rather than being restricted to general residential use, given a clear need for student housing within Canterbury.
- 1.1.4 Both the University of Kent and Canterbury Christ Church University previously expressed interest in the site given a compelling need for student housing within Canterbury. Their approaches are attached to these representations at **Appendix 1**.
- 1.1.5 This note has been uploaded to the online questionnaire to supplement the answers given to the questions as requested by Canterbury City Council ('CCC'). This letter is structured to aid cross reference to the questionnaire and the draft Local Plan itself, with subheadings provided to indicate where comments are made in respect of specific policies.

#### 1.2 Site Context

##### *The Site*

- 1.2.1 The site occupies 1.7ha and sits south of Spring Lane and east of Pilgrims Road, within the built-up area of Canterbury. The site was part of the Chaucer Technology School which has now been demolished and replaced by the Barton Manor School, construction of which is now complete. The

new school occupies a reduced site area, immediately to the east of the subject site, meaning that this surplus land can be made readily available for development.



Figure 1: Canterbury City Local Plan Policy C15 - Policies Map (Regulation 18 Version)

- 1.2.2 The site has been cleared of existing buildings but was previously occupied by four large school buildings of single and double storey, and a hardstanding area which accommodated 6 tennis courts towards the south of the site. Two separate access points were provided, one off Spring Lane and the other off Pilgrims Road. The site features a number of mature trees on the western and southern boundaries.
- 1.2.3 The surrounding area is of mixed uses including residential housing areas to the north, and to the south on the opposing side of a railway line. To the west is the playing fields of Canterbury Christ Church University and immediately to the east is the new Barton Manor School which comprises a large part two/part three storey main school building and a smaller two storey sports centre building.

#### **Planning History**

- 1.2.4 The subject site itself has an extensive planning history associated with the former school including the erection of a new building in the 1990s. More recently, CCC confirmed that Prior Approval was not required for the demolition of the buildings in October 2019 (Ref: CA//19/01811). There is no relevant history of any planning applications for alternative uses, however pre-application discussions have been held with regard to proposed development on the site.
- 1.2.5 Pre-application discussions were held in 2016 in relation to the proposed wider school development and a residential development on the subject site (Ref: PRE16/00041). The response, dated 11/04/2016, concluded that *"In principle, it is considered that the development of the site for both residential and educational uses is acceptable and that the Council could support such a proposal"*.
- 1.2.6 Further discussions were held in 2017 in relation to the subject site only. A scheme of 630-640 student bedrooms was put forward (Ref: PRE17/00045) and the response, dated 13/03/2017 stated that *"the proposed development would be acceptable in principle, subject to the loss of the community facility"*. Concern was raised regarding the number of bed spaces proposed and the resulting concentration of students and therefore impact on the character of the area and potentially on residential amenity.

- 1.2.7 Planning permission for the Barton Manor School on the land immediately to the east of the subject site was granted by Kent County Council in November 2019. The permission allowed for a 5-form entry Secondary School, comprising a 3-storey building and separate sports hall together with hard and soft landscaping and a new Multi-Use Games Area (MUGA) (Ref: CA/19/1633) (KCC/CA/0166/2019).

#### ***Overview of Development Sought***

- 1.2.8 The call for sites submission was lodged in respect of a proposed student housing scheme. The online questionnaire was completed accordingly, and the accompanying reports were prepared on the basis of a student development. KCC had obtained up to date market feedback which advised that there remains strong demand for purpose-built student accommodation within Canterbury, and have been in discussions with Canterbury Christ Church University and the University of the Creative Arts. Accordingly, GHl's preference for the redevelopment of the site is for a purpose-built student housing scheme, along the lines of the indicative proposals set out within the Illustrative Proposed Site Layout Plan (Rf: DHA/14671/03).
- 1.2.9 The proposed student scheme features c.600 bedspaces arranged over four buildings which range from two to three storeys in height, and each arranged around a central courtyard. The proposed development includes shared amenity areas around the site periphery and between the buildings and retains the existing trees which are also supplemented by new tree planting. A copy of an indicative layout is provided at **Appendix 2** to these representations.
- 1.2.10 The proposed blocks have been set back from Spring Lane to match the previous building line of the school and are set back from Pilgrims Road to enable the retention of the existing mature trees and create new open spaces. The blocks feature corner sections which will incorporate higher ridges and architectural treatment to vary scale and massing.
- 1.2.11 Block A would incorporate a main entrance leading to communal areas and facilities including laundry. All blocks will be provided with integrated cycle and refuse storage, with additional cycle storage to be provided around the site.
- 1.2.12 The development will include a shared surface spine road and would be car free, with servicing areas and drop off/pick up spaces for use at the beginning and end of term to aid in students moving in and out. At all other times these spaces would be inaccessible to cars and controlled by a Site Management Plan.
- 1.2.13 Main vehicular access (for servicing and pick up/drop off) would be provided via Pilgrims Road, with pedestrian and cycle access and a secondary emergency access via Spring Lane. Additional pedestrian routes into the site would also be provided for greater permeability.
- 1.2.14 The call for sites submission in June 2020 provided an alternative residential proposal, submitted primarily to provide a degree of flexibility with regard to onward use of the site, for example, should there be a decline in the market demand for student accommodation in Canterbury. This was considered a particularly sensible submission to make in June 2020 in the midst of the first Covid-19 related national lockdown, with significant associated uncertainties relating to student housing. A draft layout was submitted, showing a residential layout of 70 homes on the site.
- 1.2.15 Any future scheme would be subject to early and meaningful engagement with the local community and Council.

### ***The Draft Allocation***

- 1.2.16 GHl welcome CCC's decision to allocate the site for development. This reflects the clear suitability of the site as a sustainable, centrally located brownfield site appropriate for a high-density development. The site has been draft allocated for residential development, under Policy C15, for a minimum of 70 dwellings across c.0.88ha of the site. This will comprise:
- 30% affordable housing in line with Policy DS1
  - 15% of new homes to be built to M4(2) standards, and 5% to M4(3) standards in line with Policy DS2
- 1.2.17 The allocation also seeks a comprehensive and integrated sustainable urban drainage network, 20% biodiversity net gain and a substantial landscape buffer to the railway line and the adjacent school. The policy also seeks improvements to cycle and walking links to the city centre and other neighbourhood amenities.

### ***Availability***

- 1.2.18 The subject site has been made available for development following the grant of planning permission for the Barton Manor School on a reduced area of the former Chaucer School site. Kent County Council has been consulting with the Department for Education since July 2016 with regard to the disposal of the subject site when an application was submitted in accordance with Section 77 of the Education Act. In April 2020 this process concluded and in accordance with Section 77 the site is now clear for disposal. The site is therefore available for development.

## **1.3 Response to Draft Local Plan Policies**

### ***Policy C15: Land at the Former Chaucer Technology School***

#### Q. Do you have any comments on this policy?

- 1.3.1 We strongly support CCC's decision to allocate the site for development. This reflects the clear suitability of the site, as a sustainable, centrally located brownfield site, appropriate for a high-density development. However, GHl are concerned that the draft policy would prevent a student housing scheme being delivered on the site. A preliminary masterplan has demonstrated that the site has capacity to accommodate c.600 bedspaces.
- 1.3.2 The aspirations for the site stem from an understanding that there is a compelling need for student housing in Canterbury. Nationally, according to Cushman & Wakefield<sup>1</sup> as of 2023 there was an unprecedented demand for student accommodation with 96.4% of students seeking housing during their academic journey and a national average student-to-bed ratio of 2.1:1, emphasising the continued need for additional accommodation units.
- 1.3.3 There are four universities in Canterbury; the University of Kent, Canterbury Christ Church University, the University for the Creative Arts and the Girne American University.

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<sup>1</sup>Cushman & Wakefield UK Student Accommodation Report (2023)

- 1.3.4 Kent County Council have been in regular discussions with both the University of Kent and Canterbury Christ Church university. Both universities confirmed at the time that for the academic year 2022/23 all available student accommodation, including private accommodation, was full with no spare capacity. Both the University of Kent and Canterbury Christ Church University previously expressed interest in the site given the compelling need for student housing within Canterbury. Their previous approaches are attached to these representations at **Appendix 1**.
- 1.3.5 Knight Frank prepared a City Market Report on Student Property in Canterbury, published in Q3 2023<sup>2</sup>. At the time, 44,353 full-time students were enrolled at Canterbury universities, an increase of 33% since the 2017/18 academic year.
- 1.3.6 There are 19 University Sector PBSA schemes, between them offering 7,049 bedspaces – a decrease of 322 bed spaces since the 2018 report. In addition to this, Knight Frank identified that there were 12 operational private sector student accommodation schemes in Canterbury, offering 4,334 bed spaces – an increase of 2,770 bed spaces. Despite this increase in private sector schemes the report identified that 74% of students in Canterbury are unable to access purpose-built student accommodation or a student-to-bed ratio of 3.9:1, significantly above the national average ratio of 2.1:1.
- 1.3.7 At the time of writing, Knight Frank identified a future supply of 1,144 arising from consented planning permissions, but no further applications currently under consideration. There may well have been submissions since the date of publication of the Knight Frank report.
- 1.3.8 Allowing for the additional bedspaces arising from the consented planning permissions there is potentially a maximum of 12,527 student bedspaces available in Canterbury. Against Knight Frank’s figure of 44,353 students, there remains an undersupply of 31,826 bedspaces. It is contended therefore that this represents a clear need and provides a compelling case to adjust the draft policy so that the site is allocated for student housing as an alternative to general residential to help meet this need.
- 1.3.9 Notwithstanding the clear need, there are significant benefits associated with providing purpose-built student accommodation, including:
- Improving the student offer within Canterbury, allowing the universities to attract the best students from the UK and abroad.
  - Freeing up private housing for family and general residential occupation.
  - Helping to reduce the number of HMOs within Canterbury
- 1.3.10 The land at the former Chaucer Technology School is perfectly located to provide purpose-built student housing. It is centrally located within Canterbury, within a convenient location for access by non-car modes of transport to the various higher education institutions as well as the city centre and other amenities to support day to day living.

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<sup>2</sup> Knight Frank Canterbury City Market Report Student Property Research 2023/24 (2023)

1.3.11 We note that draft policy DS5 sets out the circumstances in which a proposal for student housing would be considered favourably. Taking these in turn:

<i>Be of a scale comparable to an increase in academic or administrative floorspace resulting in increased student numbers, or supported by evidence of an identified need for student accommodation</i>	<i>As demonstrated within these representations, there is an identified need for student accommodation</i>
<i>Not compromise the delivery of sites allocated for general housing, employment or other uses within the Local Plan</i>	<i>If adopted in the current form, proposed policy C15 could prevent the site coming forward for student housing as it would be allocated for general housing</i>
<i>Demonstrate that any existing use for employment, commercial, leisure or other main town centre uses is no longer viable</i>	<i>The former school has now been replaced by the Barton Manor School and the land is surplus to requirements</i>
<i>Not lead to an over-concentration of students in an otherwise residential area and therefore conflict with the purpose of HMO Policy DM3. A student management plan which appropriately mitigates potential harm to residential amenity agreed with the Council will be required</i>	<i>The site would not lead to an over-concentration of student housing in this locality, and would enable the release of unsuitable accommodation to be used for family housing. A Student Management Plan would be prepared</i>
<i>Make provision for affordable housing in line with Policy DS1</i>	<i>GHL would be willing to discuss this requirement with CCC during pre-application discussions</i>
<i>Be located in an area well served by pedestrian and cycle routes and public transport, and easy access to local shops, community facilities and the establishments existing educational facilities</i>	<i>The site falls within a highly accessible location, a short walk or cycle from the city centre and established educational facilities, including a 7 minute walk from the University of the Creative Arts campus and a 12 minute walk from the Canterbury Christ Church University main campus</i>
<i>Be a car free scheme, which provides sufficient levels of high quality cycle storage</i>	<i>The proposed scheme is intended to be car free. Cycle storage will be provided in accordance with the relevant standards, within internal cycle stores</i>
<i>Ensure parking requirements on site are kept to the operational minimum and include servicing, disabled and drop-off facilities, and demonstrate robustly that the proposal would not lead to an unacceptable level of car parking on the surrounding streets</i>	<i>The development would be car-free, but has been designed to have sufficient drop-off facilities for the start and end of term, as well as servicing provision</i>
<i>Be well-designed, providing appropriate space standards and facilities and capable of being adapted in the future to alternative residential uses</i>	<i>The proposed scheme would be designed to meet all required standards, with the long-term use and re-use of the site considered throughout the design process</i>

1.3.12 Accordingly, it is demonstrable that the site would accord with CCC's general requirements with regard to purpose-built student housing schemes within Canterbury. We therefore urge CCC to reallocate the site for student housing as an alternative to the current general residential allocation.

## 1.4 Conclusions

- 1.4.1 This representation has been prepared on behalf of Galliard Homes Ltd in relation to Land at the Former Chaucer Technology School, policy C15.
- 1.4.2 This representation shows that we strongly support CCC's recognition that the site is suitable for development and should be allocated through this Local Plan. Nevertheless, we have concerns with the nature of the proposed allocation for residential development, which would restrict opportunities for a purpose-built student accommodation development to be delivered on the site. Accordingly, we suggest that policy C15 should comprise a general housing allocation which could allow a purpose-built student accommodation development to be delivered on this site.
- 1.4.3 GHL are aware of discussions that have been held between KCC and both the University of Kent and Canterbury Christ Church University which culminated in both universities expressing interest in the site within approaches which are appended to these representations. We provide evidence within this report of a compelling need for purpose-built student accommodation within Canterbury, and we therefore urge CCC to pay regard to the evidence provided within these representations and re-allocate the site for student housing, for the provision of c.600 bedspaces within a car-free development.
- 1.4.4 GHL will be committed to working with KCC and CCC to ensure that the ultimate allocation within the submission version of the Local Plan is deliverable and represents the optimum development solution for the site.

## APPENDIX 1



## Mark Bewsey

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**From:** T.Pereira@kent.ac.uk  
**Sent:** 13 January 2023 08:37  
**To:** S.Dodd@kent.gov.uk  
**Cc:** Nick.Alston@avisonyoung.com; thomas.boxall@avisonyoung.com  
**Subject:** Former Chaucer Technology school site

You don't often get email from t.pereira@kent.ac.uk. [Learn why this is important](#)

Simon,

I understand KCC are reviewing options for the former Chaucer Technology School site on Spring Lane?

The University of Kent's has seen student demand remain robust and we have already seen post-pandemic recovery. Our recruitment of new students was on target in September 22, and this translated into 99.5%+ occupancy of the 5,400 on campus rooms on our Canterbury campus. The university would be supportive of PBSA development on this site with a view to reducing pressure on single family home demand in Canterbury for use as student accommodation, with a corresponding benefit to student experience and welfare that derives from dedicated facilities.

I hope this is useful in your evaluation of options.

Regards,

## Trevor Pereira

Director of Commercial Services and Estates

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*sent via email: S.Dodd@kent.gov.uk*

16 January 2023

Dear Mr Dodd

I write to formally support the use of the land at the former Chaucer Technology School, as a potential site for purpose built student housing.

There is a significant demand for student housing within Canterbury, with all of the university managed accommodation and private Purpose Built Student Accommodation fully booked this September. There is a shortfall in accommodation, as more students want purpose built accommodation, rather than shared HMO type accommodation. There are increases in some student populations such as the new medical school on longer programmes due to the needs of their training. Purpose built student accommodation should release more HMOs back to the residential market.

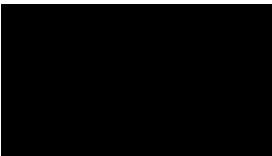
Your land at the former Chaucer Technology School is perfectly located, being within a short walk to the city Centre and an estimated 10 minute walk from our campus on North Holmes Road. We consider this to be within easy walking or cycling distance for our students, allowing them to access the University and other day to day facilities such as shopping and leisure without requiring the use of a private car.

I understand that your land could accommodate a student development amounting to somewhere between 500 and 600 bedspaces. This is the perfect range to ensure long term viability for a purpose-built scheme of this kind.

We would also support a mixed use site, with any adjoining area for family accommodation to meet the needs for our staff.

I look forward to discussing the proposals with you in more details.

Yours sincerely



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Director of Estates and Facilities  
Canterbury Christ Church University

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Professor Rama Thirunamachandran, Vice Chancellor

## APPENDIX 2

