



Canterbury City Council  
Council Offices  
Military Road  
Canterbury  
CT1 1YW

Our Ref: MWB/30293

28<sup>th</sup> May 2024

Dear Sir / Madam,

### **CANTERBURY CITY COUNCIL LOCAL PLAN REPRESENTATION – REGULATION 18 LAND AT THE FORMER CHAUCER TECHNOLOGY SCHOOL**

This representation has been prepared on behalf of Kent County Council (hereafter, 'KCC'), in response to the Canterbury City Council Draft Local Plan Regulation 18 Consultation, which runs until the 3<sup>rd</sup> June 2024.

Canterbury City Council (hereafter, 'CCC') is in the process of preparing a new Local Plan to set out a strategy for development across the district for the period to 2040, and is seeking views on the overall spatial strategy, the vision and objectives, individual site allocations and any of the Plans' draft policies. CCC have prepared the Draft Local Plan on the basis of feedback gained from the issues consultation in 2020, options consultation in 2021 and the previous consultation in Q3 2022 – Q1 2023 on the Draft Local Plan to 2045. The Draft Local Plan (subject to this representation) has been revised following feedback from previous consultations alongside relevant updates that have been made to the National Planning Policy Framework ('NPPF').

The Council's Local Development Scheme (published March 2024) sets out that following the consultation period for the Regulation 18 Local Plan, publication and consultation for the Regulation 19 Draft Local Plan will take place between July 2024 – May 2025. It is anticipated that the Draft Local Plan will be submitted to the Secretary of State and Independent Examination will take place between June 2025 – January 2026. Formal adoption of the new Local Plan will be between February and March 2026.

KCC own the former Chaucer Technology School site and are promoting it for redevelopment through the review of the Local Plan. The site was submitted as part of the Call for Sites exercise in June 2020 and a representation was made during the consultation of the previous Draft Local Plan in Q1 2023. The site is immediately available for development and has been included as a draft allocation for residential development under Policy C15. KCC 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, KCC wish for Policy C15 to allow the site to come forward for either, or a combination of, student housing and/or residential uses. The reason for this is to keep flexibility in the policy wording so that student accommodation can be delivered in view of the clear need for student housing within Canterbury.

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This letter 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.

### **Site Context**

The site occupies 1.7ha and is located south of Spring Lane and east of Pilgrims Way, within the built-up area of Canterbury. The site was part of the Chaucer Technology School, which has been demolished and replaced by the Baron Court Free School Academy. The new school occupies a reduced area to the east of the subject site, leaving the site readily available for development. The site has been cleared of existing buildings and is currently vacant. Access to the site is available via Spring Lane and Pilgrims Way. The surrounding area comprises a mixture of uses including land used for educational purposes (including the school and playing fields for the university) and residential.

The site has an extensive planning history that is associated with the former school. There is no relevant planning history for the site for any alternative uses; however, pre-application discussions took place in 2016 (ref. PRE16/00041) where the principle of the development of both residential and educational uses was considered acceptable, and in 2017 (ref. PRE17/00045) where the development of a student housing scheme was also considered suitable for the site.

### **Overview of Development Sought**

Two separate call for sites submissions have previously been lodged. A call for sites submission was submitted in 2020 to provide an alternative residential proposal, submitted to provide a degree of flexibility in the onward use of the site for if there were to be a decline in the market demand for student accommodation. This, at the time of the COVID-19 pandemic, was considered sensible due to the lockdown and a draft layout was submitted to show an indicative layout of 70 dwellings on the site.

The representation made for the previous Local Plan consultation related to the development of a student housing scheme in view of the clear demand for student accommodation in Canterbury, particularly after COVID-19. The representation was made on the basis of the delivery of a development comprising student housing, featuring c.600 bedspaces arranged over four buildings of between two to three storeys in height, alongside associated amenity space, landscape and parking.

It is clear that the demand for student accommodation has risen since COVID-19, and whilst there are no set plans for the site, it is sought that there is some flexibility as to whether the forthcoming development will be fully residential or comprise some purpose-built student accommodation in view of increased demand within the city. KCC are willing to work with CCC in the preparation of the development proposals.



## **Draft Allocation**

The site has been included as a draft allocation for residential development under Policy C15 for a minimum of 70 dwellings. The wording of the policy has been amended slightly since the publication of the previous Draft Local Plan for consultation where the site was included as an allocation under Policy C19. The revised allocation now includes for the housing mix (including affordable housing) to be delivered in line with Policies DS1 and DS2. Small changes have been made to Part 2 of the policy (Design and Layout) which provides the appropriate density (at 80dph), seeks the development to respond to local character and considers the local school with regard to overlooking. No amendments have been made to the landscape and green infrastructure requirements under part 3; however, amendments have been made to the transport and access section of the policy whereby the development would no longer be required to be car free but would need to improve pedestrian and cycle links to the city centre and local amenities.

KCC welcome CCC's decision to allocate the site for development as it reflects the clear suitability of the site as a sustainable, centrally located brownfield site appropriate for high-density development. KCC nonetheless seek amendments to the policy wording to allow for flexibility in the tenure of the future development of the site in view of the rising demand for student accommodation since the COVID-19 pandemic.

## **Availability**

The subject site has been made available for development following the grant of planning permission for the Barton Court Free School Academy on a reduced area of the former Chaucer School site.

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

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

*Q15. Do you have any comments on this policy?*

KCC 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 that is appropriate for a high-density development. However, KCC remain concerned that the draft policy would prevent a student housing being delivered on the site. The previous representation included a preliminary masterplan that demonstrated that the site has capacity to accommodate c.600 bedspaces. Whilst not intended to deliver a scheme comprising 100% student accommodation, some flexibility in the wording is requested to allow an element of student accommodation to be delivered.

As demonstrated previously, there is a compelling need for student housing in Canterbury. There are four universities in the city (University of Kent, Canterbury Christ Church University, the University College for Creative Arts and the Girne American University). Both the University of Kent and Canterbury Christ Church University confirmed that for the academic year 2022/23, all available student accommodation, including private



accommodation, was full and that there was no spare capacity. Both universities have expressed interest in the site for this reason.

Knight Frank prepared a Market Report on Student Accommodation in Canterbury dated October 2018. At the time 34,247 full-time students were enrolled at the universities in Canterbury and of these, 27,327 were based in Canterbury. As of this time there were 22 halls of residence in the city which between them provide 7,371 bed spaces to students. There are alternative forms of accommodation including private rented and Houses in Multiple Occupations (HMOs). However, at the time of writing the report, Knight Frank identified an undersupply of 20,789 bed spaces (taking into account future supply from planning applications that had either been approved or were awaiting determination). This means that as of 2018, 67.3% of students would be unable to access student accommodation.

Cushman and Wakefield's Student Accommodation Report (2023) more recently reports unprecedented demand for student accommodation, with 96.4% of students seeking housing during their academic journey. The market research further identifies that there is currently a supply shortage in student housing, with a student-to-bed ratio of 2.1:1 which emphasises the continued need for additional accommodation units.

When weighing up applications that have either been submitted and awaiting determination or approved for student accommodation against the identified demand for bedspaces in Canterbury, it is clear that there remains a significant undersupply of bed spaces that needs to be taken into consideration. It is still contended that there is a compelling case for the draft policy wording to be updated so that the site is allocated for both student and residential housing to help meet this need, alongside the general housing need in the City Council.

There are further benefits associated with providing a level of purpose-built student accommodation on the site, which includes:

- 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

The land at the former Chaucer Technology School is perfectly located to provide a mixture of purpose-built student housing and residential 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.

## **Conclusion**

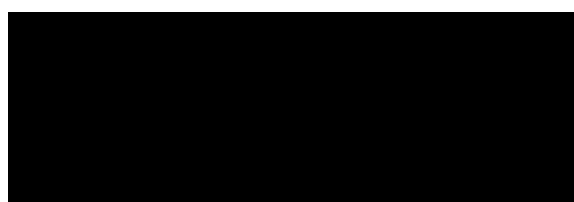
This representation has been prepared on behalf of Kent County Council in relation to land at the former Chaucer Technology School, Policy C15. The representation shows that KCC still strongly support CCC's recognition that the site is suitable for development and the inclusion of the site as an allocation in the Local Plan. Nevertheless, we still have concerns



with the nature of the proposed allocation for only residential development, which would restrict opportunities for a student development to be delivered on the site. Accordingly, we suggest that Policy C19 should comprise a general housing allocation which could allow for either or both student housing and general residential housing development to be delivered on the site.

KCC will be committed to working with 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.

Yours Faithfully



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Director

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