



IN ASSOCIATION WITH



Draft Canterbury District Local Plan to 2040

Response to the Regulation 18 Consultation

**Site known as Land at The Old Gasworks, Simmonds Road
Wincheap Industrial Estate, Canterbury**

On behalf of Blueberry Developments Estates Ltd

Prepared by:

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Introduction

- 1.1. We are writing on behalf of our client, Blueberry Development Estates Ltd, in respect of the Regulation 18 Draft of the Canterbury District Local Plan (DCDLP) to 2040.
- 1.2. This representation responds to draft Policy C19 – the ‘Wincheap Commercial area’, which has been identified in the draft Local Plan as a broad location for a mixed-use regeneration incorporating commercial and residential development. In addition, it seeks to respond to other topic policies within the plan which refer to student accommodation provision.
- 1.3. Our clients own The Old Gasworks site located on Simmonds Road, which falls within the boundary of the C19 policy, and as part of the Regulation 18 Consultation, we wish to raise the following representations:
 - We **object** to how Policy C19 has been drafted, specifically that ‘student accommodation’ has been omitted from the types of residential accommodation allowed under criteria C19 1(b).
 - We **object** to the wording of policy DS5 - Specialist housing provision, where it sets a threshold limit for the deliverability of student accommodation to be limited to a 10-minute walk of the relevant campus.
 - We also raise an **objection** to the wording of Policy C5- Canterbury Urban Area Canterbury Business Park policy and the wording of policy DS9 relating to Educational and Associated Development. The C5 policy text includes the wording; “University related development will be focused within the designated university campuses, in line with Policy DS9, which sets out that off-campus student accommodation will only be supported in limited circumstances”.

Context

- 1.5. The Old Gasworks, herein known as 'the site', consists of a gas distribution station located on the northern edge of the Wincheap Industrial Estate, within the Canterbury Urban Area. One half of the site previously contained a large gasholder which was demolished circa 2015-2016. The other half contains a number of modest structures remaining on the site, including a gas distribution station.

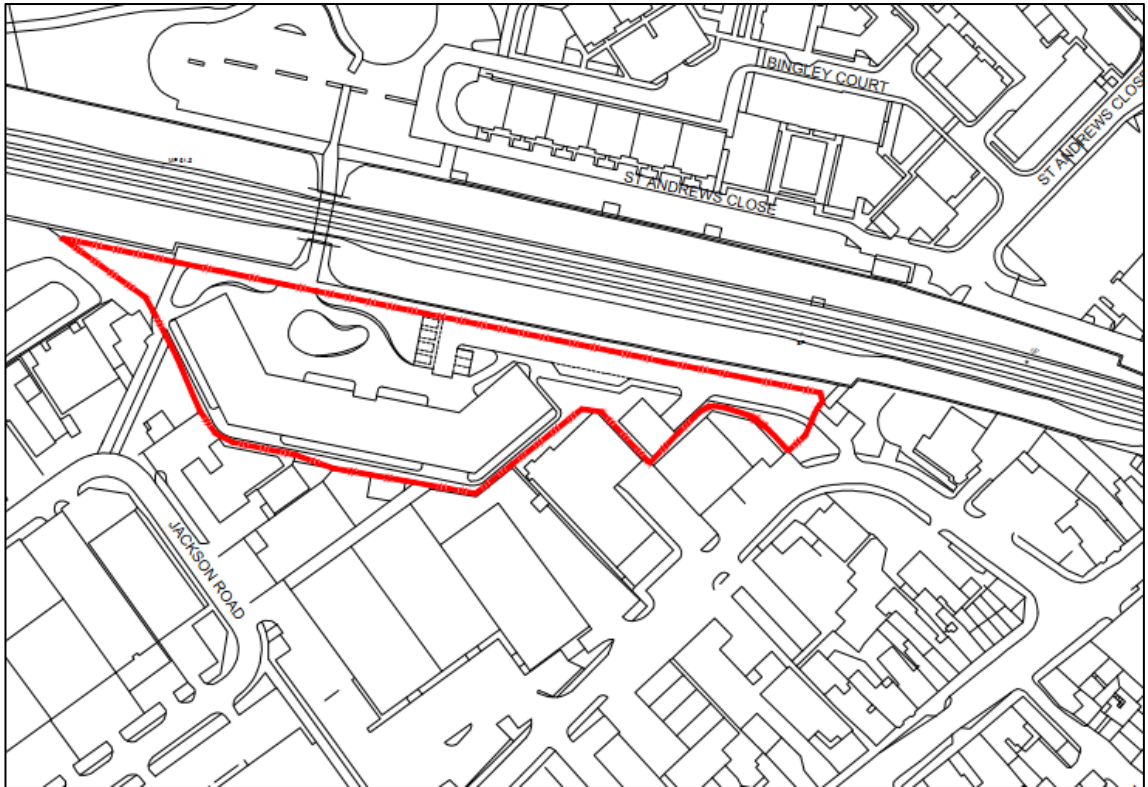


Figure 1: Site Boundary

- 1.6. To the south of the site are several commercial premises in differing uses, within the Wincheap Industrial Estate. Whilst not exhaustive, these uses include a roofing suppliers, vehicle and tyre repairs workshop, retail warehouses and leisure facilities (including an escape room business). Existing vehicle access is available directly to the south-east of the site from Simmonds Road.

- 1.7. Immediately to the north is a railway embankment which accommodates the Chatham Main Line. Canterbury East railway station is located to the east of the site approximately seven minutes' walk away. The railway embankment is extensively tree lined, providing a natural buffer along the site boundary. On the other side of the railway line to the north is a large, relatively modern, housing development.
- 1.8. Also just beyond the northern site boundary is an underpass which runs underneath the railway embankment and provides for pedestrian and cycle connectivity into the city centre and to the Great Stour Way and Riverside Walk. Designations within these nearby areas include the Whitehall Meadows Local Nature Reserve and the Great Stour (Ashford to Fordwich) Local Wildlife Site.
- 1.9. The site is located within Flood Zones 2 and 3, and the south-western edge of the Canterbury City Conservation Area is in relatively close proximity to the site, along Simmonds Road close to where it meets the Maidens Head Public House and Wincheap. There are also a number of listed buildings present along Wincheap, some of which are also visible from Simmonds Road. The main city centre is located to the north of the site.

Planning History

- 1.10. The planning history on the site relates primarily to the demolition of the gas holder, which has now subsequently taken place.
- 1.11. Pre-Application advice was sought in August 2022 (Reference PRE/22/00241), which requested feedback on proposals to provide purpose built student accommodation (circa 279 bedrooms, split across a part nine, seven, five and one storey building) on the Gasworks site. The buildings were proposed to be to the south of the site, with open space/public realm improvements to the north.
- 1.12. Feedback received on the pre-app submission from the Council highlighted the need to consider the scale, massing and design of the buildings, especially within the context of the World Heritage Site, wider historic environment and street scene.

- 1.13. Furthermore, the need to address how the provision of student accommodation would not conflict with the redevelopment aspirations of the Wincheap Commercial Area were highlighted by the Case Officer, although no details as to why a specific purpose-built student accommodation scheme would impede the aspirations for the Wincheap Commercial Area were provided.

Development Overview

- 1.14. The provision of student accommodation as proposed for this site would consist of the erection of Purpose Built Student Accommodation within buildings ranging from six-eight storeys in height, and containing circa 268 bedrooms. The accommodation would be comprised of a mix of both studio and student cluster apartments which will facilitate independent living, with both shared and private kitchen/lounge facilities.
- 1.15. The development would be proposed around three main blocks of accommodation which are designed in order to facilitate modular construction. Each block ranges from five-nine storeys in height and they would be connected by two single-storey elements which at ground floor will provide an accessible student hub, restaurant, amenity and storage space (including for circa 160 cycles) for future occupants, accessible through a proposed high-quality landscaped public realm.
- 1.16. A contemporary design approach is proposed at this stage, with each block to be constructed with a mixture of external facing materials including black zinc panels and contrasting grey/brown bricks. The landscaping proposed within the courtyard would be comprised of a mixture of hard and soft materials,
- 1.17. Vehicle movements at the site would be predominantly restricted to spaces for deliveries and servicing, disabled bays and a sufficient number of bays to facilitate pick-up and drop-off at the start and end of term, ultimately this is envisaged to be a car-free scheme.
- 1.18. Crucially, the existing access into the site will be upgraded to also provide an attractive pedestrian/cycle route which will better connect Wincheap into the Great Stour Way and Riverside Walk, improving access to nature and public open space for residents.

Deliverability

- 1.19. Paragraph 68 of the National Planning Policy Framework ('NPPF') requires for plan-making, local planning authorities ('LPAs') should identify and update a supply of specific deliverable sites sufficient to provide 5 years-worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of. Furthermore, specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan need to be clearly set-out.
- 1.20. The Glossary of the NPPF defines deliverable and developable as following:
- 1.21. *"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- 1.22. *a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- 1.23. *b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years".*
- 1.24. *"Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".*
- 1.25. The site subject to this representation would contribute positively to the requirements to meet needs for student housing within the District, making good and effective use of a brownfield site, located in a highly sustainable location with good access to public transport, local services and facilities. We therefore consider that the principle of development in this location should be considered to be acceptable.

Availability

- 1.26. The site is under the control of Blueberry Developments Estates Ltd and is available for delivery within the plan period. Full rights of access from Simmonds Road across Canterbury City Council land into the site are also in place. It is anticipated that a planning application will be submitted during 2024 for student development at the site.

Achievability

- 1.27. As set out in the former pre-app on the site, proposals for a student-accommodation led scheme have already been well considered and costed. Therefore, it is considered that a scheme of this nature would be achievable.

Response to Policy C19 'Wincheap Commercial Area':

- 1.28. In the new Regulation 18 Draft Local Plan (2024), the Wincheap Commercial Area has been identified as a broad location for mixed use development, retaining the existing level of business, commercial and leisure floor space in addition to residential development which would be compatible with the primary commercial function of the site (Policy C19).
- 1.29. Whilst we strongly support the Council decision to allocate the site for development, we object to the non-inclusion of 'student accommodation' as a type of accommodation listed in the types of residential accommodation allowed under criteria C19 1(b), as it is considered that student accommodation should be included in the policy wording.
- 1.30. The evidence which supports and provides the basis for C19 policy, is limited and flawed and, does not provide a justified conclusion as to why student accommodation could not form part of the Masterplan Area.
- 1.31. The Wincheap Master planning Appraisal background document (Carter Jonas, October 2022), sets out the development options for the site, specifically the intensification of the brownfield site through existing industrial and retail warehouse operators releasing land for non-commercial uses, particularly residential.



| Key | | | |
|---|--|--|--|
|  | Site boundary |  | Opportunities to improve cycling/walking access and safety |
|  | Open space/ landscape buffer- Indicative locations |  | Pedestrian and cycle access |
|  | Opportunities for green corridors |  | Vehicle access |
|  | Long distance views |  | Wincheap gyratory- indicative route |
|  | Railway station | | |

Figure 2: Local Plan Policy C19 Map Extract

- 1.32. This position has arisen because the updated Retail and Leisure Study by GL Hearn (July 2020) has highlighted that the retail need requirement has changed markedly and there is now very little additional retail need identified for the period to 2040. This position changes the development context for Wincheap quite significantly.
- 1.33. Two options are explored in the Carter Jonas appraisal; Option 1 and Option 2. In summary, Option 1 reflects the site constraints and seeks to formulate a design solution to address in particular the flood risk issues, with industrial uses are situated in the highest area of flood risk (Flood Zone 3) and the residential uses are situated in the lowest area of flood risk (Flood Zone 1). Option 2 is designed to be more interventionist and seeks to create a residential neighbourhood that takes advantage of the position and views overlooking the river away from the busier parts of the Wincheap area. This solution includes student accommodation at the northern end of the industrial estate and focuses on commercial uses along Simmonds Road.

- 1.34. Whilst it is noted that the site is currently shown as being at increased risk from flooding (i.e. within Flood Zones 2 and 3), the previous site use has left the site contaminated and therefore there is a need for remediation to be provided. As part of this, it has been recommended (by others) to cap the site through the raising of ground levels. To understand any potential impact of this on the flood risk at the site, and to surrounding areas, a post development hydraulic model (using the EA's provided model as the baseline) scenario has been run. This model included the proposed ground levels with remediation and has shown the not only does this remove the site from areas of risk (i.e. leave it within Flood Zone 1) but also poses no increased risk to third party land.
- 1.35. There is no assessment or conclusion within the Appraisal document which sets out why Option 1 was chosen over the other. Indeed, Option 2 is seen as the more financially viable option as set out in page 22 of the appraisal. It is very difficult to determine from the assessment how conclusions were arrived at and why the eventual policy disregarded student accommodation when it was considered as the most viable option of the two.
- 1.36. Furthermore, in the introduction to the Appraisal it sets out in the final paragraph that: *"This report provides a review of the existing uses, constraints and property market, together with high level masterplan options and development appraisals of these options with the key assumptions and inputs, followed by recommendations on the future planning policy for the site"*. However, there are no recommendations contained within the Appraisal.
- 1.37. A further review of the Development Topic Paper offers no further evidence to support why student accommodation was not included in the Mixed-Use policy text of C19.
- 1.38. We submit that there is no robust evidence that sets out why the delivery of student accommodation on the site would potentially undermine the wider redevelopment aspirations of the Wincheap Commercial Area and submit that this would be an appropriate location for student accommodation due to its central location within the Canterbury Urban Area.

- 1.39. It is located within walking distance (less than 250 metres) from the currently defined Canterbury City Centre and is a conveniently located site with access to the higher education institutions in Canterbury by alternative modes of transport to the private car, as well as being in close proximity to the city centre where there are a range of facilities and amenities to support future residents.
- 1.40. Crucially, the development of the site also provides the opportunity to provide enhanced pedestrian and cycle connectivity through the site to connect from Wincheap to the underpass running underneath the railway embankment, improving the public realm and the overall environment.
- 1.41. This will provide a significant public benefit to existing residents of Wincheap, allowing them to access the Great Stour Way and Riverside Walk without having to take the existing convoluted and unattractive routes currently available through the Industrial Estate. Instead, an attractive landscaped and well-lit public route would be provided through the development site at Simmonds Road through to the other side of the railway line.
- 1.42. A plan extract showing the potential arrangement of the site and enhanced connectivity is provided below.



Figure 3: Potential Development Site Layout

Affordable housing in the context of site C19

- 1.43. NPPF Paragraph 60, sets out that: *“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community”.*
- 1.44. *NPPF Paragraph 63 sets out: “Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes”.*
- 1.45. The Canterbury District Local Plan Viability Study (2022) confirms that proposals for student accommodation and sheltered housing can viably make contributions to affordable housing provision in the district.
- 1.46. It also confirms that there is a significant level of need for affordable housing over the period of the Local Plan to ensure access to housing, including both rented and home ownership accommodation, and so it is important that qualifying developments continue to provide at least 30% affordable housing with an appropriate mix of tenures.
- 1.47. On this basis, we consider that Policy C19, as drafted, considerably misses the opportunity that would enable additional affordable housing to be delivered in the district that could potentially achieved through suitable contributions from purpose-built student accommodation schemes.

Demand for Student Accommodation

- 1.48. The Canterbury Housing Needs Assessment 2021 sets out at paragraph E.2 “Canterbury has a population of 165,400 (as of 2019), a 22% increase since 2001. With three Higher Education institutions within the district, Canterbury’s ratio of students (aged 18+) to permanent residents (aged 16–74) is one of the highest in England at 16.4%, compared to a national average of 6%”.
- 1.49. However, despite this high level of need it concludes that due to the existing supply of student accommodation, demand for student accommodation will not expect to rise, due to more students accessing their learning remotely. This has taken a very short-term view of the situation as the demand for student accommodation could very easily rise again during the plan period.
- 1.50. We consider that because the assessment was undertaken a year after the Covid Pandemic, there are skewed findings as to the potential need for student accommodation. During this time it is acknowledged that much of the cohort of students were either studying remotely or utilising a hybrid approach to their learning. However, four years on from the pandemic this working arrangement for students has altered significantly as students are beginning to return to face-to-face teaching.
- 1.51. In furtherance to this position, a Housing Need Assessment Addendum was produced in February 2024. However, this document continues the same approach of the Housing Need Assessment and does not promote the delivery of more student accommodation through site allocation.
- 1.52. The Development Topic Paper February 2024 also has not addressed the potential skewed assessment and has merely taken on face value that there is no need to provide for student accommodation. We would stress that in our opinion, the draft Local Plan to 2040 does not conform with the requirements of the NPPF Paragraph 63 and the need to plan for different groups in the community within planning policies, including students.
- 1.53. On this basis we consider that the evidence base is not up-to-date, a position we **object** to.

- 1.54. As part of a planning application submitted in April 2023 for the redevelopment of land at 59-61 Sturry Road, Canterbury for a part four, part five and part six-storey accommodation complex (CCC Reference: CA/23/00788) a report entitled “*Student Housing in Canterbury*” (Colliers – April 2023) has been prepared and is available to view on the Canterbury planning applications portal.
- 1.55. The conclusions of this report are relevant to the demand for student accommodation in the Canterbury District. In particular this highlights a number of points that demonstrate an increase in the number of Canterbury students in the preceding two years prior to the report and a significant increase in the student-to-bed ratio requirements in Canterbury. This report provides much greater detail on the Canterbury student market than the Canterbury Housing Needs Assessment Addendum (February 2024) available as part of the Local Plan evidence library, which is almost silent on this matter.
- 1.56. The key matters to take from the Colliers report that justify the requirements for specific purpose built-student accommodation includes:
- Student numbers in the City have expanded rapidly with over 12,500 more students in 2021/22, compared with 2019/20. This is described as a relatively healthy student-to-bed position which is now above the national average.
 - The growth in student numbers has increased pressure on local infrastructure, specifically the wider housing market, where, against national trend, rental inflation has been greatest in three-bedroom homes as housing demand from students has spilled over into HMO markets.
 - The huge proportion of students has significantly skewed the local housing stock, with the Local Plan Private Rented Sector, more than twice the size of the national picture. This attractiveness of the City to smaller-scale “Buy-To-Let” landlords means that they not only are local families competing in the Private Rental Sector, they also face stiff competition for family-sized homes in the “For Sale” market. Without a significant increase in the supply of purpose built student accommodation there will be a clear further skewing of the local housing market.

- Full-time student numbers in the 2021/22 academic year in Canterbury was 44,350, a 30.5% increase from the 33,985 full-time students in the 2011/12 academic year. Canterbury Christ Church University in particular has seen an increase in student numbers of 21,075, or 83.4%, between 2011/12 and 2021/22.
 - The total number of students in Canterbury in 2021 was 2.5x the number of beds available. Unlike previous years, this ratio is now above the national average, indicating that there is a shortage of student accommodation beds in Canterbury to keep up with the growing numbers.
 - There are fifteen halls of residence at the Higher Educational Establishments in Canterbury providing 5,953 bed spaces for their students. The total number of students living in non-PBSA has been rapidly increasing and in 2021/22, 16,270 students were not living in PBSA, a 45.6% increase since 2014/15. This lack of bed spaces at the establishments and the number of students not able to access PBSA puts pressure on the private rental market as a whole.
 - As of March 2023 there were eight private sector student accommodation schemes in Canterbury totaling 2,707 bed spaces. There were also three extant planning permissions with 298 bed spaces to come forward and another three applications that would provide 1,067 bed spaces if approved. Overall, in combination with the available spaces in halls of residence, there are not enough spaces available to cater for demand and therefore further PBSA provision is needed to relive pressure on the local housing market and free up properties for local families.
- 1.57. At the national level, a CBRE report published in July 2023 identified that the student housing sector continues to suffer from supply and demand imbalance, with major university towns in the UK contending with a shortfall of more than 350,000 student bed spaces.
- 1.58. We conclude that the inclusion of 'Student Accommodation' within the policy text of C19, would enable the site to better meet the aspirations of delivering a more varied housing mix, including affordable housing, to meet the local need in Canterbury accordance with section 5 of the NPPF.

Response to Policy DS5 – Specialist Housing Provision

- 1.59. Policy DS5 (Criteria 3) for all new student accommodation outside of the defined university boundaries to be within a 10-minute walking distance of the relevant campus is considered to be onerous and in conflict with other policies within the Draft Local Plan. In particular, this position directly contradicts the aims of Highways and Parking policy (DS15) which promotes transport infrastructure and connectivity in the district and the findings in the Movement and Transportation Strategy (SS4), along with policy Active and Sustainable Travel (DS14).
- 1.60. Page 125 of the Development Topic Paper sets out the main sustainability objective of policy DS15 is to make educational institutions more accessible. It helps ensure schools, colleges, and universities can be reached more easily and safely by supporting regular attendance, something that students from disadvantaged backgrounds can struggle with.
- 1.61. There is no evidence provided within the Draft Local Plan, or the background documents, which supports the arbitrary requirement for a threshold of a 10-minute walking distance. Many students would already be walking further than this if utilising city-wide accommodation not provided on campus. It also does not consider whether a student would be utilising public transport or travelling by bike.
- 1.62. Furthermore, student accommodation provided by the private sector may not necessarily be aligned to a particular educational establishment. Therefore, having to provide accommodation which would be within a 10-minute walking distance of a particular university setting within Canterbury could make proposals undeliverable as sites that fall within 10 minute walking radius of both campuses would not exist, unless in the middle of the Town Centre.
- 1.63. On this basis, we **object** to the inclusion of the policy as currently worded and suggest that the policy wording is amended as follows:
- 1.64. ***“DS5(3). Proposals for purpose-built student accommodation within higher and further education campuses will be supported. Where this is not achievable, proposals must be located within walking distance to campus. In exceptional circumstances, where it can be demonstrated there are no suitable alternative sites, highly accessible locations may be considered”.***

1.65. In considering the requirements of draft Policy DS5, we would also respectfully suggest that this development at Simmonds Road, Wincheap, would broadly conform with the requirements of the wording as set out below, and that therefore it should be considered positively for such allocation within the Wincheap Policy C19. In particular, the below assessment demonstrates broad compliance with how the site would comply with Policy DS5:

- DS5(3) – *Proposals for student housing must be within a 10-minute walk of the relevant campus* – The site is within a 10 minute walk of the Canterbury Christ Church University library building on Rhodaus Town, notwithstanding the fact it is in a generally highly sustainable location.
- DS5(4a) – *Proposals must be of a scale comparable to an increase in academic or administrative floorspace resulting in increased student numbers of supported by evidence of an identified need for student accommodation* – We would stress that the Housing Needs Assessment does not positively take into account the return to face-to-face teaching post-pandemic and should this should be factored in when considering the demand for student accommodation across the Plan period.
- DS5(4b) – *Proposals must not compromise the delivery of sites allocated for general housing, employment or other uses within the Local Plan* – Allocation of the site for student housing would complement the allocation put forward at Policy C19 and by coming forward early in the Plan-process would demonstrate confidence in the regeneration of the Wincheap Industrial Estate without comprising the ability for the remainder of the site to be brought forward for other housing or employment uses.
- DS5(4c) – *Proposals must demonstrate that any existing use for employment, commercial, leisure or other main town centre uses is no longer viable* – The site has been redundant since the removal of the gas holder nearly 10 years ago. There would be no loss of existing uses through its redevelopment.

- DS5(4d) – *Proposals would 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* - There are no existing students and this is not an existing residential area. Whilst students would access the site from Wincheap and potentially through connecting cycle/pedestrian routes near residential properties, it is not considered the numbers would be so significant to represent harm to residential amenity. A student management plan would be provided prior to any occupation of student development.
- DS5(4e) – Proposals should make provision for affordable housing in line with Policy DS1 – As indicated above, providing purpose built student accommodation at the site would potentially allow for a contribution towards affordable housing to be made.
- DS5(4f) – Proposals should 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 establishment’s existing education facilities – The site is in a highly accessible, sustainable location, in close proximity to the city centre and existing educational facilities.
- DS5(4g) – Proposals should be a car free scheme, with provides sufficient levels of high quality cycle storage & DS5(4h) 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 – This would be a car free scheme with cycle storage incorporated. Parking requirements would be kept to a minimum with only disabled parking and pick-up/drop-off facilities available.
- DS5(4i) – Proposals should be well-designed, providing appropriate space standards and facilities and capable of being adapted in the future to alternative residential use – These requirements would be captured in the design of any future development proposal.

Response to Policies C5 - Canterbury Urban Area – Canterbury Business Park Policy and DS9 Education and Associated Development

- 1.66. We submit that there has been no evidence put forward that sets out why student accommodation should be focused on the existing Kent University Campus and the development boundary of Canterbury Christchurch Church University.
- 1.67. The provision of privately owned and managed student accommodation has been delivered elsewhere in the City and it has been well-received by students; both by providing additional choice in the market and extra provision when need has not previously been met.
- 1.68. We also consider that the policy text of C5, as drafted, is misleading and unsound as it does not reflect policies elsewhere in the draft Local Plan.
- 1.69. Criteria 4 of policy C5, sets out the following:
- 1.70. *“...University related development will be focused within the designated university campuses, in line with Policy DS9, which sets out that off-campus student accommodation will only be supported in limited circumstances. Proposals for hotel and conference facilities within the University of Kent Campus will be supported to address the gap in this type of provision within the wider area”.*
- 1.71. However, Policy DS9 which relates to Education and Associated Development doesn't specifically refer to student accommodation, but to 'educational buildings', this sets out as follows:
- 1.72. *“4. Elsewhere within the urban and settlement boundaries proposals for educational buildings or improvements to existing educational buildings will be supported in suitable locations and where proposals align with other policies in this plan”.*
- 1.73. We consider that the wording of both policies should be improved to ensure that the delivery of off-campus student accommodation could be delivered by external providers in accordance with market demand and the findings of the current, and any, future Housing Needs Assessment, noting that we have expressed concerns in respect of this document and whether it is suitably up to date.

Conclusions

- 1.74. This representation shows that whilst we support the Council's allocation of land at the Wincheap Commercial Area and the wider objectives for its redevelopment, we are concerned that the wording of Policy CS19 as drafted would prevent opportunities for land at the Simmonds Road former gasholder station site from being brought forward for delivery of purpose built student accommodation at the site.
- 1.75. We therefore **object** to the wording of Policy CS19, specifically CS19(1)(b) and suggest that this should be re-written as follows:
- Approximately 1,000 new dwellings, including affordable housing, older persons housing, accessible housing, self-build housing, **purpose-built student accommodation**, and an appropriate housing mix in line with Policies DS1 and DS2*
- 1.76. We also **object** to the wording of Policy DS5, in particular the requirement for new purpose-built student accommodation to be within a 10-minute walking distance of a particular university setting. This would have the potential to exclude proposals on development sites that may otherwise be in highly sustainable locations with a wide variety of transport choice, including walking, from being able to be brought forward.
- 1.77. Blueberry Development Estates Ltd is prepared to engage with Canterbury City Council as may be necessary to ensure that a suitable purpose-built student accommodation scheme is brought forward for this site.

Appendix 1: Site Location Plan

Appendix 2: Potential Development Layout

APPENDICES

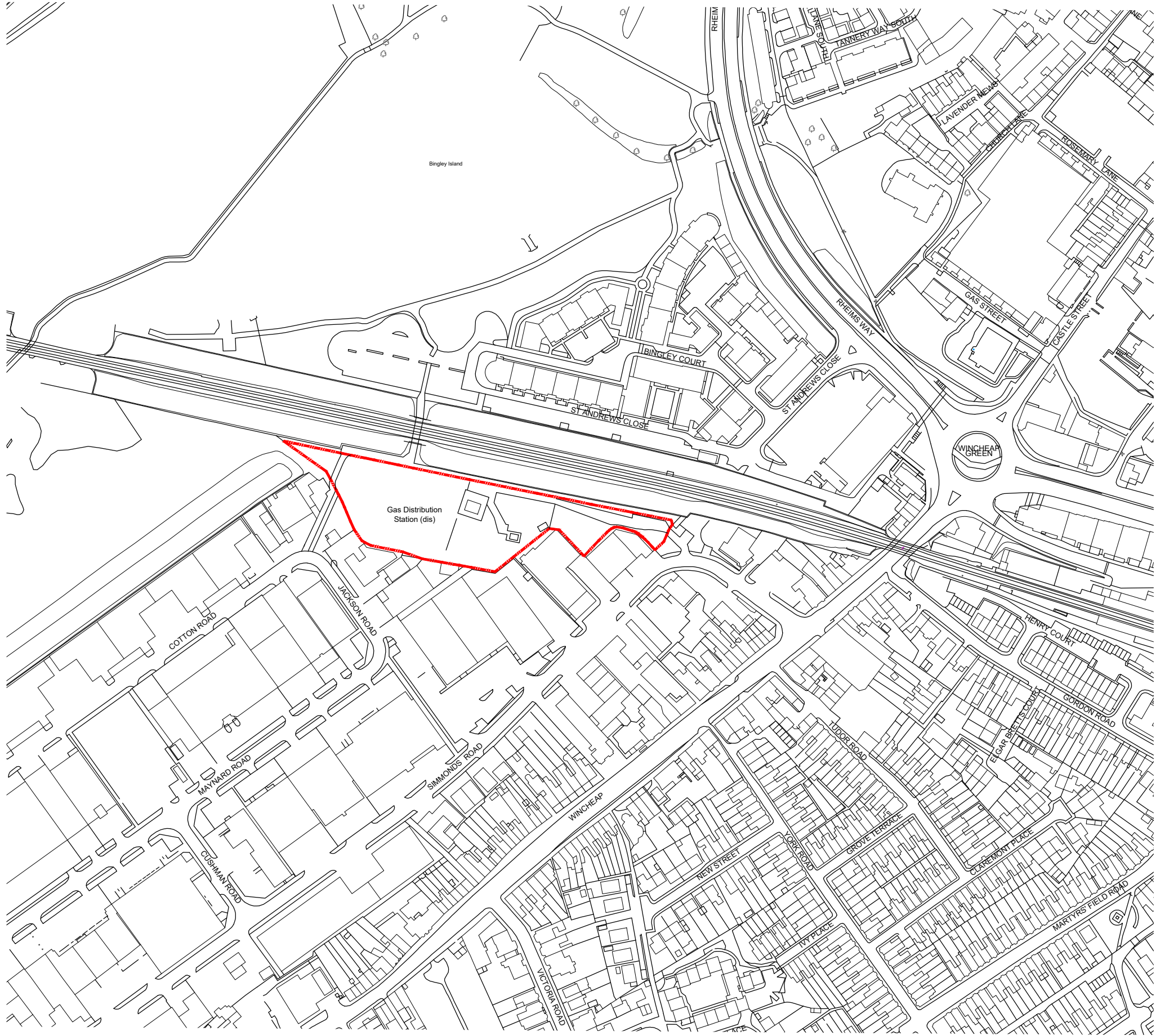
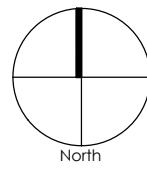
The Old Gasworks, Simmonds Road, Wincheap, Canterbury



APPENDIX 1

Site Location Plan

SCALE 1 : 2500
 SCALE 1 : 1



----- Proposed Site Boundary

| Rev | Date | Description | Rev By | Chk'd By |
|-----|----------|-------------|--------|----------|
| - | dd-mm-yy | ----- | --- | --- |

| | | | | |
|---------------|--|--------------|----|------------|
| Project Title | PROPOSED DEVELOPMENT | | | |
| | OLD GAS WORKS SIMMONDS ROAD CANTERBURY | | | |
| Client | CLIENT | | | |
| Status | FEASIBILITY | | | |
| Scale | 1:2500 | Drawing Size | A3 | |
| Date | 31/05/2022 | Drawn By | CW | Checked JW |

| | | | |
|-------------------------------------|--|-----|---|
| Drawing Title | LOCATION PLAN | | |
| Job-Dwg No | 17201-013 | Rev | - |
| <input type="checkbox"/> | 2 St. Johns North, Wakefield, WF1 3QA t. 01924 291800 | | |
| <input type="checkbox"/> | Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG t. 0161 2388555 | | |
| <input type="checkbox"/> | The Old Rectory, 79 High Street, Newport Pagnell, MK16 8AB t. 01908 211577 | | |
| <input type="checkbox"/> | 101 London Road, Reading, RG1 5BY t. 0118 9507700 | | |
| <input checked="" type="checkbox"/> | 10 Gees Court, St Christophers Place, London, W1U 1JJ t. 0207 4091215 | | |



APPENDIX 2

Potential Development Layout

