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Canterbury City Council
Council Offices,
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CT1 1YW

16th January 2023

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 2,075 residential dwellings and at least 208 retirement living homes, alongside high quality community facilities and improved access to Canterbury from the A2. 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 and included at Appendices 2 and 3:

- Land Use Budget Plan, prepared by Milton Studios; and
- Coopers Pit Regionally Important Geological Site (RIGS) Survey prepared by Ecologia.

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. 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. Policy C5 (South West Canterbury)

Draft Policy C5 sets out the area of South West Canterbury as a wider area identified to deliver 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 including the new A2 junction which would utilise land at and service Merton Park. 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 draft Policy C5 for the inclusion of this strategic development area 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 draft Policy C5 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. Quinn Estates are keen to engage with Canterbury and the other landowners as part of this process, with dialogue already taking place with Pentland Homes in regards to their proposals for development at Land north of Hollow Lane (Thanington, Policy C7). It is also acknowledged that both CCC and Kent County Council (KCC) have landholdings and therefore in light of this it will be necessary to establish an appropriate mechanism to ensure that multiple land ownership is not a barrier to delivery.

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 and open space), 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. This is however subject to further evidence base work with CCC on the delivery of the significant infrastructure for Merton Park specifically, 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. This is expanded on further below.

This is with the exception of parcels R07 and R13 as shown on the Land Use Plan, which are included for residential development, rather than open space as indicated in the Concept Masterplan under policy C6. It is noted that this is 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.

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. 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 work being 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.

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 82 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 costs of the new slipways and other highway infrastructure associated with the South West Canterbury Link Road, delivery of the new hospital shell and the fluctuating cost of building materials which can have knock-on effects for the feasibility for other elements of the scheme. Similarly, the draft Policy requires compliance with Policy DS2 which specifies a specific housing mix for all development proposals. This does not 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 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.

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.

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. The policy requirements must be given full consideration and stress tested using viability assessment to ensure that the policy is deliverable. 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 has to 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.

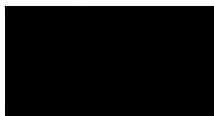
d. Summary and Conclusions

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 to ensure that a scheme which is deliverable against the necessary criteria 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,

A solid black rectangular box used to redact the signature of Sophie Innes.

Sophie Innes
Associate

APPENDIX 1 – CONSIDERATIONS OF DRAFT POLICY C6

This should be updated to reflect the increased residential land area

This wording should be reviewed to allow for a flexible approach based on market conditions

This needs to be viability tested

This wording should be reviewed to allow for a flexible approach based on market conditions

This needs to be viability tested within the Whole Plan Viability Assessment to ensure it is deliverable and can meet HRA

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, which measures 99.67ha, the development mix will include:

(a) Approximately 2075 new dwellings across circa 46.13ha:

- (i) 30% affordable housing in line with Policy DS1;
- (ii) 10% bungalows;
- (iii) 15% of new homes to be built to M4 (2) standards, and 5% to be built to M4 (3) standards;
- (iv) An appropriate housing mix, in line with Policy DS2; and
- (v) Self and custom built plots in line with Policy DS2.

(b) A minimum of 208 units of older person accommodation, to be located within the community hub, providing a variety of different types and taking account of any specific identified needs;

(c) 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 stadia (Category C (Step 3) FA graded ground as a minimum).

(d) Open space: on-site open space will be provided in line with Policy DS24, to include approximately:

- (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 (approximately 5.91ha) containing a mix of uses including:
 - (1) Local centre including commercial (minimum 1,300sqm) and local shopping and community uses (minimum 520sqm);
 - (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 2FE primary school (2.05ha), 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.

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

- (i) 19.67ha of new natural and semi-natural;
- (ii) 11.06ha of new amenity green space (including green corridors) in addition to the retention of the existing amenity space at Lime Kiln Road (0.36ha) and the existing Stuppington Lane Green Corridor;
- (iii) 3.93ha of new parks and gardens;
- (iv) 2.70ha of new play facilities including:
 - (1) 1.23ha of new fixed play areas with LAP and LEAP facilities;
 - (2) 1.48ha of NEAPs and destination play facilities including a new skatepark of at least 0.15ha;
- (v) 4.28ha of new outdoor sports; and
- (vi) 74 new allotment pitches (1.84ha) to be provided adjacent to the existing Wincheap allotment site to the north.

- 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 mitigate any adverse impacts on heritage assets, including the setting of the World Heritage Site;
- (h) Mitigate any adverse noise impacts from the adjacent A2; and
- (i) Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations.

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 (Policy SP3), in the Canterbury District Local Plan 2017;
- (b) Create a complete, compact and well-connected neighbourhood, where

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

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) Retain substantial areas of the existing tree cover and incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area H4: Nackington Farmlands set out in Canterbury Landscape Character and Biodiversity Appraisal;
- (d) 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;
- (e) 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;
- (f) Incorporate parts of existing orchards for their landscape, biodiversity, historic and social value, where possible and appropriate, into the layout of the development;
- (g) 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;
- (h) 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;
- (i) preserve and enhance views towards the City and World Heritage Site with provision of viewing corridors from open space and PRowS crossing the site;
- (j) 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 villages of Bridge, Patribourne and Lower Hardres; and
- (k) 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 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.

- (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) Investigate the downgrading of 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.

5. Phasing and delivery

- (a) Waste water treatment works should be delivered prior to occupation of any dwellings on the site.
- (b) New access from the A2 and connectivity to Site C7 Hollow Lane should be delivered prior to occupation of any 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

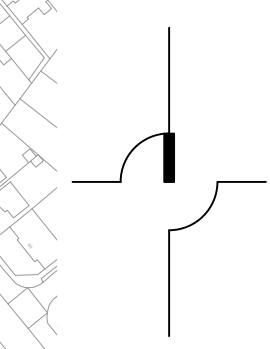
- and supporting infrastructure, to complement the overall site masterplan.
- (g) The primary school site must be transferred to KCC at 'nil consideration' and fulfil KCC's General Transfer Terms, prior to the occupation of 100 dwellings.

- (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.

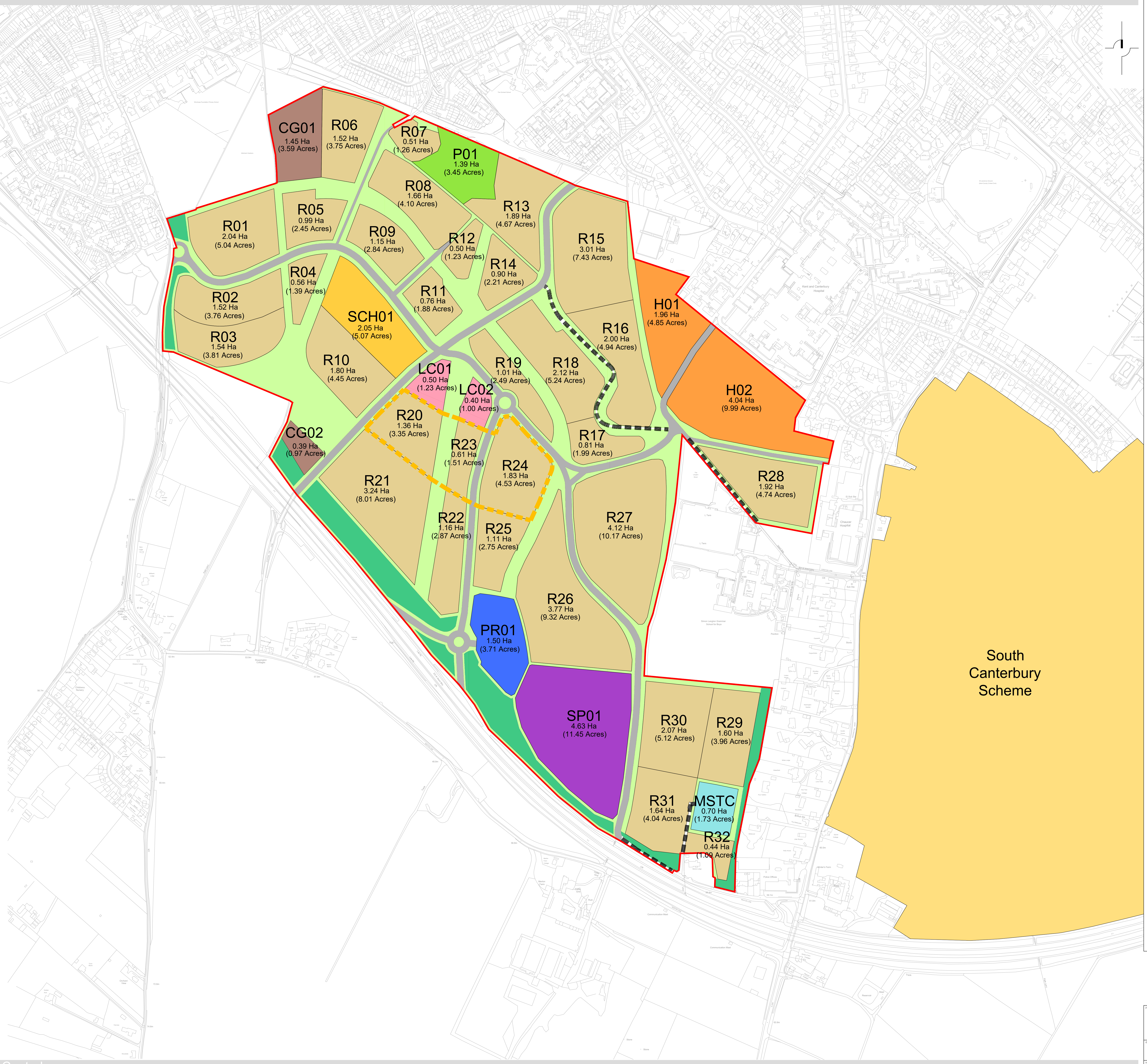
This needs to be viability tested

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

APPENDIX 2 – LAND USE BUDGET PLAN



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



South Canterbury Scheme



Quinn Estates

MILTON STUDIO

Church Farm, Milton Manor Farm, Ashford Road, Canterbury, Kent, CT14 7PP
e:info@miltonstudio.co.uk

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

Drawing No: Land Budget Plan

Scale: 1:2500 @A0
Date: June 2022

Sheet No: 2937-313 N

APPENDIX 3 – COOPERS PIT RIGS SURVEY

Ben Geering
Quinn Estates Ltd
Highland Court Farm
Bridge
Canterbury
CT4 5HW

Ecologia Ref: EES 22.248.1
Client Ref: Merton Park – RIGS Site

16th December 2022

**Re: Merton Park Regionally Important Geological Site (RIGS) Site (Coopers Pit),
Canterbury, Kent – Site Survey Letter Report.**

Ecologia Environmental Solutions Ltd was appointed by Quinn Estates Ltd to undertake a site survey at the above Site to establish features of interest to determine whether development within the boundary of the RIGS site is possible. This letter report includes an overview of the works carried out.

1. Scope of Works

The scope of works comprised the following:

- A Site survey to determine whether the potential for development within the RIGS site is feasible, which includes an assessment on the degree of weathering of the cliff face exposures and a review of other RIGS sites within Kent to determine whether better exposures of the same geological formations / market beds exists.
- Production of a letter report to summarise the findings of the above.

2. Regionally Important Geological Sites Located within Kent

A survey of all the RIGS sites within Kent was carried out to gain an understanding of the site conditions. This was undertaken using publicly available information comprising BGS logs, RIGS GeoConservation Kent website, data references etc.

From the RIGS GeoConservation Kent website the following information was obtained:

- There are thirty-eight (38No.) RIGS sites present within Kent, of these sites seventeen (17No.) contain Chalk bedrock, which are broken down into the following Chalk formations:
 - Seaford Chalk Formation – Five (5No.) locations.
 - New Pit Chalk Formation – Two (2No.) locations.
 - Margate Chalk Formation – Five (5No.) locations.



- Holywell Nodular Flint Chalk Formation – Two (2No.) locations.
 - Lewes Nodular Flint Chalk Formation – One (1No.) location.
 - West Melbury Marly Chalk Formation – One (1No.) location.
 - Zig Zag Chalk Formation – One (1No.) location.
- The site also known as Coopers Pit is located on Chalk Bedrock of the Seaford Chalk Formation. There are four (4No.) other RIGS sites located on the Seaford Chalk Formation of which only the Francis Chalk Quarry contains any similar feature to that of Coopers Pit, where as they both contain part of the Micraster coranguinum zone, other than that the sites are individually distinctive in their importance.
 - Coopers Pit itself has exposures of the Seaford Chalk Formation which were noted to be in a degraded condition. However, two (2No.) Chalk exposures were still visible / retained with distinct flint bands.
 - The Southern Cliff Face contains the Cretaceous unconformity whilst the western face exposes Micraster Coranguinum and the site potentially contains unusual inland exposure of the higher Chalk zone.

From the information obtained above the majority of the site is overgrown with vegetation and no features of specific interest except a large cliff exposure on the southern perimeter of the site, a small overgrown cliff towards the north of the site and a hardstanding area including retaining walls. The quarry itself accounts for only 40-50% of the site with the remaining area being arable farmland or grassland.

3. Site Survey Observations

A site survey was undertaken on the 29th November 2022. During this walkover survey the following points of interest / observations were noted (and are highlighted in Figure 1, Appendix I):

- Access to the ‘quarry’ was via Stuppington Lane along a downwards sloped track, which runs along the northern perimeter of the site (elevation between 43-30m AOD) parallel to the neighbouring residential development.

Zone 1

- Zone 1 (approx. 1.6ha) is at a much higher elevation (37-40m AOD) than that of the historic quarry and is currently used for arable farmland.

Zone 2

- Zone 2 (approx. 0.8ha) - the topography level decreases from that of Zone 1 to between 36-32m AOD. It has been assumed during the walkover that this is a terraced area of the historical quarry, which was heavily overgrown and included some mature trees, however, most of the ground cover comprised predominantly low height scrub / bushes.

Zone 3

- Zone 3 (approx. 0.1ha) appears to consist of a concrete hardstanding with retaining walls that has been assumed to be related to historical vehicular movements during the operation life of the quarry.

Zone 4

- The central area of the site itself (approx. 1-2ha) is heavily overgrown with an elevation ranging between 20-30m AOD, and no visible geological exposures noted in this area.

Zone 5

- Zone 5 (approx. 0.4ha) this area is currently grassland and has an elevation of between 29-32m AOD which is similar to that of the area outside of the RIGS site.

Vertical Cliff Exposure

- At the southern edge of the quarry a Chalk cliff, ranging between 15m and 20m in height and is approximately 125-150m in length, is very visible.
- A talus slope was visible during the walkover. The toe of the talus slope was approximately 5-7m in width and there was evidence of recent rock falls (although none of any significant mass).
- Flint marker beds used for mapping purposes were clearly visible.
- Significant vegetation growth was noted on the cliff exposure.
- Access to the western edge of the quarry was not possible due to significant vegetation being present and it being deemed as unsafe.

Overgrown Cliff Exposure

- South of the access route to the quarry is another cliff exposure approx. 5-10m in height, however, due to the amount of vegetation present it was not possible to provide an exact width of the cliff. As such approximately 40m of cliff was visible, although the exact length could be as much as 100m.
- No further examination of the cliff was possible due to restricted access.

4. Data limitations

Coopers Pit itself is heavily overgrown, as such it was not possible to fully access the site during the walkover. However, based upon information available, the locations of importance within the site are that of the two (2No.) cliff exposures as detailed above. It is, therefore, assumed that there are no other locations of interest within the quarry although this would need to be confirmed.

5. Conclusions & Recommendations

Based upon the site survey the following comments can be made:

Zone 1

Whilst zone 1 is part of the RIGS site it did not contain any visible exposures of the Seaford Chalk Formation. Zone 1 is used for farming and is of the same elevation as the surrounding land not included in the RIGS site, and as such development within this area could be explored.

Zone 2

Zone 2 is a terraced area and part of the historical quarry with no geological exposures encountered during the walkover. For any potential development to be considered within this zone the ground elevation would first need to be raised to that of Zone 1.

Zone 3

Zone 3 having already been developed into hardstanding and there being no geological exposures visible the area could be land raised to that of Zone 5 and proposed development could be explored.

Zone 4

Zones 4 – There were no visible geological exposures noted, however, vegetation clearance would need to be undertaken and a further walkover survey conducted. Development within this central zone could be possible but consideration would need to be given to the proximity of the cliff exposures and of the RIGS site itself.

Zone 5

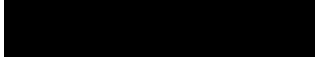
Whilst zone 5 is part of the RIGS site it did not contain any visible exposures of the Seaford Chalk Formation. Zone 5 contains grassland and is of the same elevation as the surrounding land and as such development within this area could also be explored.

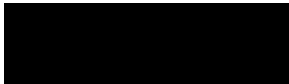
Any development within Coopers Pit and its surrounding area would need to have a detailed cliff and slope stability assessment undertaken (once the entire site has been cleared of vegetation).

We hope this report meets with your requirements; however, if you do require any further information, please do not hesitate to contact the undersigned.

Yours Sincerely,

For and on behalf of Ecologia

Prepared by: Ryan Beagley 
Senior Geotechnical / Environmental Manager

Check and Authorised by: Leigh Anne Cammack 
Director










Enc: [Appendix I](#): Figures
[Appendix II](#): Photographic Report


APPENDIX I

FIGURES

Coopers Pit RIGS Site

Legend

-  Overgrown Cliff Exposure
-  Red Line Boundary
-  Vertical Cliff Exposure
-  Zone 1
-  Zone 2
-  Zone 3
-  Zone 4
-  Zone 5
-  Photograph orientation




Google Earth

Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Image Landsat / Copernicus

Project: 22.248.1	Date: 16/12/2022
Drawn by: B.Read	Checked by: R.Beagley



Title: Zone Map	Drawing Ref: EES 22.248.1-OTHER-0001	Version 1
Site: Coopers Pit	Client: Quinn Estates Ltd.	Scale: NTS
		Figure 1.1

PHOTOGRAPHIC REPORT



PLATE 1 – ACCESS ROUTE



PLATE 2 – ZONE 1



PLATE 3 – ZONE 2



PLATE 4 – ZONE 3



PLATE 5 – ZONE 4 & VERTICAL CLIFF EXPOSURE



PLATE 6 – ZONE 5



PLATE 7 – VERTICAL CLIFF EXPOSURE



PLATE 8 – OVERGROWN TALUS SLOPE AT BASE OF VERTICAL CLIFF EXPOSURE



PLATE 9 – FLINT MARKER BEDS AND EVIDENCE OF ROCK FALLS AT VERTICAL CLIFF EXPOSURE



PLATE 10 – VEGETATION GROWTH ON VERTICAL CLIFF EXPOSURE



PLATE 11 – UNACCESSIBLE AREA OF VERTICAL CLIFF EXPOSURE



PLATE 12 – OVERGROWN CLIFF EXPOSURE



PLATE 13 – OVERGROWN CLIFF EXPOSURE



PLATE 14 – OVERGROWN CLIFF EXPOSURE