



F.A.O. Canterbury Planning Policy Team
Canterbury City Council
Council Offices
Military Road
Canterbury
CT1 1YW

Our ref: JAC/OR/16937
16th January 2023

Dear Sir/Madam,

**R.E. DRAFT CANTERBURY DISTRICT LOCAL PLAN TO 2045 REPRESENTATION -
PROMOTION OF LAND FOR RESIDENTIAL DEVELOPMENT AT NACKINGTON POLICE
STATION, NACKINGTON ROAD, LOWER HADRES, CT4 7AZ.**

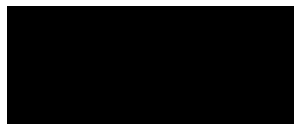
I refer to the above matter and write to provide information in respect of the promotion of land for residential development at Nackington Road by the Police and Crime Commissioner for Kent, for which was previously submitted as part of the Call for Sites process as part of the Local Plan process.

We note that Policy SS3 seeks to direct development towards the Canterbury urban area as the principal focus for development in the district, with new development being supported on suitable sites within the urban area. We support this as a sensible policy in line with the objectives of sustainable development.

While we note that the Nackington Police Station is identified as being within the Canterbury urban area on the Draft Local Plan 2045 proposals map, the site has not been allocated for residential use within the Canterbury urban area strategy. The Police and Crime Commissioner for Kent would welcome discussion with the Council for the potential for allocation of the brownfield site, which is considered highly suitable for the provision of residential development. As has been set out previously, the site has potential for various development options, and our client would welcome the opportunity to discuss which option would be most suitable to the Council.

I trust that the above is acceptable and look forward to hearing from you.

Yours sincerely,



John Collins
Director
DHA Planning Ltd





APPENDIX

1



F.A.O. Canterbury City Council
Council Offices
Military Road
Canterbury
CT1 1YW.

Our ref: JAC/DRB/14727.
27th July 2022.

Dear Sir/Madam,

PROMOTION OF LAND FOR RESIDENTIAL DEVELOPMENT COMING FORWARD IN 3-7 YEARS AT NACKINGTON POLICE STATION, NACKINGTON ROAD, LOWER HADRES, CT4 7AZ.

I refer to the above matter and write to provide information in respect of the promotion of land for residential development at Nackington Road by the Police and Crime Commissioner for Kent

Site Location

The overall Site area is approximately 0.7 hectares, with two access points. One is directly onto the 'B2068' Nackington Road and one is to the south of the Site onto Merton Lane.

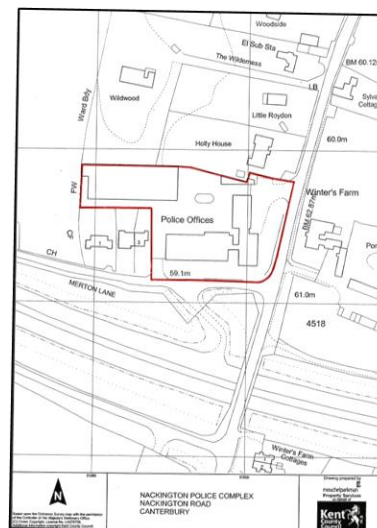


Figure 1: Site Location Plan (Courtesy of KCC).

Nackington Police Station lies to the west of B2068 Nackington Road, to the north of Nackington, and is approximately 2.2 kilometres south of Canterbury city centre.

The Site is outside the built-up boundary. Although this therefore classes the Site as countryside in terms of planning, it is already a developed Site and can therefore be considered a brownfield Site and does lie close to other development.

The A2 is within approximately 60 metres. Although there is no public access onto the A2 from this location, access is allowed for Kent Police.

The Site currently comprises a high proportion of structurally sound buildings, all used historically by Kent Police. The Site contain a range of uses from workshops to offices. These buildings are labelled A, B and C on the below plan.



Figure 2: Existing Site Plan (Courtesy of DHA Planning).

The table below outlines the existing floor space of the current buildings (it should be noted that these measurements are approximate and have been rounded to the nearest metre):

Block	Floor space (m)	Floors
A	1868	2
B	1289	1
C	133	1
Total	3290	2

Additionally, there are 63 parking spaces on the Site, one of which is allocated as disabled and two of which are larger spaces.

The image below contains an extract from the Local Plan Proposals Map. This demonstrates that the Site lies within an area of high landscape value (LB2), but does not have any other designations.

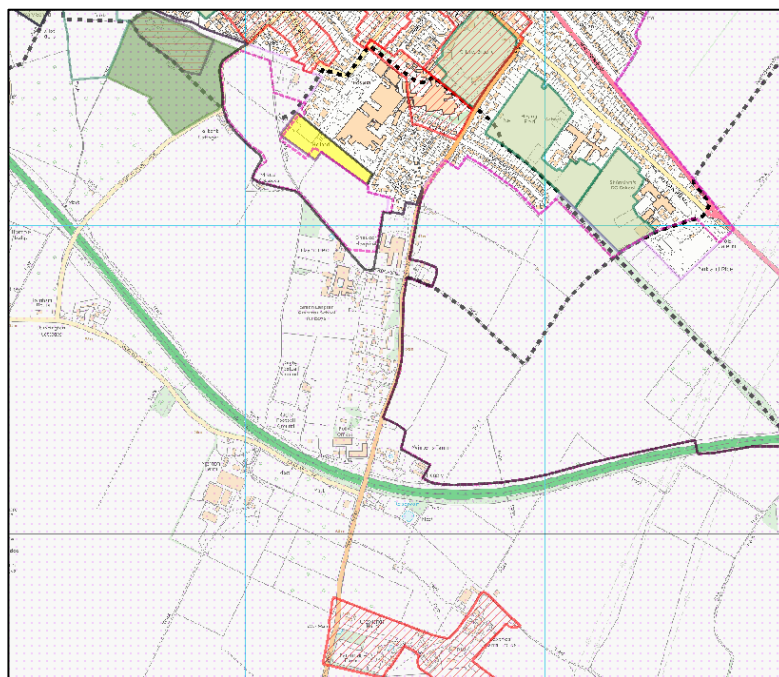


Figure 3: Extract from the Local Plan Policies Map (Courtesy of Canterbury City Council).

Directly opposite the Site is Winter’s Farmhouse, which is a Grade II Listed Building (Listing number: 1372287). Although there is a large separation gap which is currently highly vegetated between the Site and this building, any development work will have to be sympathetic to the setting of the Listed Building.

The Site does not fall within a Conservation Area or an Area of Outstanding Natural Beauty. However, Nackington itself, which lies to the south of the Site, is a Conservation Area.

Planning History

A desk-based search on Canterbury City Council’s planning portal has revealed the below planning history for the Site.

Reference	Description	Status
CA//97/01029	External alterations.	GRANTED
CA//98/00894	Erection of addition 1.2 metres high steel palisade fencing onto existing boundary walls and new 3.2 metres high entrance gates.	REFUSED
CA//99/00222	Erection of 1.3 metres high steel fencing with 3.2 metres high entrance gates.	GRANTED



CA//99/00683	External alterations.	GRANTED
CA//01/01226	Single-storey extension for use as dining room.	GRANTED
CA//07/00046	Internally illuminated freestanding post-mounted sign.	REFUSED

Although the Site has been subject to historic planning applications, it remains characteristically similar to the original layout, with most applications relating to external changes of the façades to allow for internal reconfiguration of the buildings.

Proposal

It is considered that the Site would be suitable for a housing development. The Site is currently adjacent to houses along Merton Lane as well as houses along the B2068 Nackington Road.

It should be noted that the most recent Five Year Housing Land Supply position for Canterbury City Council is 6.05 years, according to the Authority Monitoring Report 2020-2021. However, Canterbury City Council only achieved 65% in the Housing Delivery Test 2021. As a result, Canterbury City Council are a 'presumption' local planning authority (LPA), and the 'tilted balance' is engaged.

In light of the above, the impact of additional dwellings should not be underestimated as a boost to housing supply and should be afforded significant weight on the allocation of the Site. This is particularly considered to be the case where Paragraph 69 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.

1. Low Density Scheme

One option is for the existing buildings and hardstanding on the Site to be demolished to enable the erection of 11no. detached dwellings of mixed sizes with garden amenity space. These dwellings could be provided at reasonably low density; consisting of 5no. dwellings with 121m² set over two floors and 6no. dwelling of 187m² set over two floors. This would provide a mix of three, four and five bed houses at a density of approximately 16dph.

It is suggested that the workshop to the back of the yard (building B) could be replaced by four smaller dwellings (approximately 120m²) with associated access and parking. Based on floor space, this would allow for large three bed houses or more reasonably sized four bed houses.

The front part of the Site would then be demolished and 1 similar dwelling and 6 slightly larger dwellings built; these dwellings would have access and allocated parking. The larger dwellings could reasonably be four or five bedroom houses.

The Site Plan below demonstrates the potential layout option for this development.



Figure 4: Proposed Low Density Scheme (Courtesy of DHA Urban Design).

Alternatively, the Site could provide a higher density development through the use of a 2 ½ or 3 storey apartment block toward the Nackington Road frontage.

2. Smaller Unit Scheme

Another option for the Site is for the current units to be demolished and smaller units provided.

The smaller units on the Site could be provided in line with Canterbury’s average density for rural areas of 44dph. However, to provide reasonable sized houses rather than only flats we would suggest a more conservative 22no. units, providing 12no. flats and 10no. houses. This would provide dwellings at 31.4dph and therefore allow for parking and garden space.

The Council, although able to demonstrate a 5 year supply, are in need of smaller and medium housing units for the retention of graduates and families in the area. Therefore, it is likely that this scheme of smaller two or three bed units would help meet this need, and therefore a justification for the units can be made based on enabling development and meeting specific needs.

Summary

In summary there are several options for the Site, and we ask the Council to consider these as part of their emerging Local Plan. Alternatively, we would be grateful for a discussion on what Canterbury City Council may consider appropriate for the Site. The options are outlined below:

Option	Description	Development	Provided	Car parking requirement
--------	-------------	-------------	----------	-------------------------

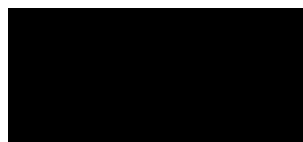


1	Low density housing at 16dhp	Demolition of existing buildings and construction of new dwellings	11 dwelling (3-5 bedrooms)	27 (22 allocated plus 5 visitor spaces)
2	Smaller housing units at 31.4dph	Conversion and part demolition of building B to provide flats and demolition of existing buildings and construction of new dwellings	Up to 22 units 12 flats and 10 dwellings (1 or 2 bed)	27 (all unallocated but 5 as visitors)

Conclusion

To summarise the above, the Site is clearly capable of redevelopment for residential purposes within a 3-7 year period.

I trust the above is clear, but if you do have any queries, please contact me at [REDACTED] or contact the office on [REDACTED].



John Collins-
Planning Director.

DHA Planning.

