



Dear Sirs,

### **Canterbury Local Plan 2045 – Focused Consultation (Regulation 18)**

I refer to the above consultation issued by the Council. The St Peters Residents' Association (SPRA) wishes to raise its comments on the plan and express its formal Objection to allocation N8 at the Millers Field. The Association trusts that this objection, (together with previous comments made) will be conveyed to the planning inspector at the forthcoming public enquiry in 2026.

#### St Peters Residents Association (SPRA)

The St Peters Residents Association is the local amenity group focused on the area of St Peters Street through to Northgate, including the Blackfriars and St Radigunds areas, extending from Black Griffin Lane and St Peter's Grove to the south-west, to Northgate and Broad Street to the north-east. More details of the Association are provided as an appendix.

#### SPRA Comments on the plan

Only one of the proposed additional development sites falls within the area of the city that is the concern of the SPRA. This is the proposed allocation N8 at Millers Field. The Association wishes to object to this allocation.

The Association were shocked to see the Miller's Field allocated as a potential development site. There are several reasons for this:

Firstly, we dispute that this is a brownfield site. Although there is a car park here the majority of the site is a public park area, associated with the Riverside Walk.

#### Historical background

The Miller's Field was originally natural river water meadows and was sold by Thomas Sidney Cooper to the Canterbury City and County Borough in 1888. Following this the City carried out engineering improvements with works to channelise the Stour, providing a stormwater relief channel and the construction of 2 iron bridges, these replacing older ones that carried the ancient route alongside the river out from the St Peter's postern gate towards St Stephen's village.

The area between the Causeway, the river and the relief channel was then laid out as a public path with horse chestnut trees planted around all 3 sides of it.

It has long been understood that this area of land was intended by Sidney Cooper to provide a play area 'for the boys of Northgate' and the Millers Field has remained as a public park right through to the present day.

The small car park was imposed on the middle of the space in the 1960s as a temporary measure but has since persisted in this use.

### Planning background

The present-day string of open spaces and pathways along the rivers Stour through the city has its origins in a 1973 planning document '*Riverside Area Footpaths and Recreation*' produced by the City Architect and Planning Officer, with the City Engineer in March 1973 and adopted by the City and County Borough Council. This introduced the concept of a Riverside Park, a string of footpaths and open spaces all along the river, providing connectivity for the enjoyment of the river. In the main this network has been generally achieved during the past 50 years and is one of the amenity assets of the City.

In addition, the site lies within the river floodplain and most of it is categorised by the Environment Agency as Zone 3 (annual flood risk greater than 1%)

for these reasons the SPRA object to the inclusion of the site as a development site. It is part of the public amenity assets of the city and the existence of a car park there should not be used as a simplistic reason to be allocated as a brownfield site ripe for development.

### Impact on the character of the area - Heritage objections

in addition to the amenity and planning objections there are two, seemingly contradictory reasons for not developing the site.

Firstly, the site is an attractive riverside space surrounded by trees. If the car park were to be developed for housing, the resultant buildings would sit at the centre of the space destroying the open character of the riverside.

Since the site is prone to flooding, if development were to be built there, it would need to be raised up above the surrounding ground level to meet the requirements of the EA, resulting in an obtrusive design that would further spoil the character of the locality.

It's an established planning principle that when there are proposals that have the potential to impact on significant trees, this as a result of the potential nuisance that the trees would have on a future residential site, leading to pressure to remove the trees, then the proposals would generally be considered to have another set impact on the locality leading to a refusal

The contradictory concern is that historically, North Lane afforded one of the most magnificent views of the cathedral as seen across the water meadows, rising above the houses of the town. This view was first recorded by the pioneer photographer Fox Talbot in 1845.

The landscaping of the Millers Field and tree planting were carried out by the city council in the 1880s and eventually, these trees led to the total loss of this magnificent view, and today this potential view is completely obscured.

However, today, these trees are fully mature and inevitably the trees will come down, allowing the restitution of this amazing view at some point in the not-so-distant future.

If in the meantime the Miller's Field itself was built on, then the potential opportunity to regain this extraordinary view would be totally lost for all time.

**To summarise**, the St Peter's Residents' Association objects to the proposed allocation of site **N8** for development for the following reasons:

- The site is a long-established element in the string of amenity spaces alongside the river Stour which enhance the character of this part of the Conservation Area.
- The importance of the space was recognised by the City and County Borough in 1973 and was identified in their '*Riverside Area Footpaths and Recreation*' planning policy adopted by the council at the time which has since been largely achieved. Development of the site would undo this established amenity.
- the site lies within the designated river floodplain and the constraints of the site here would mean that development here would be raised up above the ground, contributing to its intrusive nature.
- That any development of the centre of the site would inevitably bring pressure to remove the trees around the development to protect the amenity of the incoming residents
- that any development of the site would also permanently prevent the long-term objective of re-establishing the magnificent view of the cathedral that would be achieved once the trees pass their maturity and have to be felled.

With this submission, the Association wish to include the following:

- An extract from the 1973 planning document '*Riverside Area Footpaths and Recreation*'
- *An extract showing the historical background to the Millers Field and the lost extraordinary view of the Cathedral.*
- *Detailed particulars of the St Peters Residents Association*

yours sincerely

Clive Bowley

*Chair St Peters Residents Association (SPRA)*