

Canterbury City Council Local Plan Regulation 19 Pre-Submission Consultation

Land at Sargeants Parade, Parham Road, Canterbury

Representation submitted on behalf of S R Waitt and P Roberts

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1. The site at Stour Promenade / Sargeants Parade is currently subject to Policy OS9 in the 2017 adopted Local Plan as protected existing open space. This designation was carried over from the previous adopted Local Plan.
 2. Policy OS9 permits the loss of protected existing open space in certain circumstances including:
 - a) No material harm to the contribution the protected open space makes to the visual or recreational amenity of the area.
 - b) The open space has been assessed by the city council as making no positive contribution to its overall strategy on open space.
 - c) Where there would be material harm this would be balanced against a demonstrable need for the development.
 - d) There is no alternative site available to accommodate the proposed development and any harm that might result from the development could be offset by the provision of other comparable open space.
 3. The site is at the western end of the Parham Road Student Village. This Student Village commenced more than 20 years ago as various parcels of employment land became available for redevelopment. They were sequentially developed. The site which is the subject of this representation was used as a site compound during those construction works. Materials, plant and machinery were stored there during this period.
 4. We previously submitted representations in the council's Call For Sites and we also submitted representations in the council's Focussed Consultation on the Canterbury District Local Plan in 2025. We attach a copy of that last representation, submitted in October 2025 as appendix 1.
 5. The Regulation 19 draft Local Plan now incorporates the site as part of a wider area of "green corridor". Policy SS3 sets out the broad development strategy for the district. The site is within the Canterbury Urban Area which under paragraph 4 of Policy SS3 is identified as the principle focus for development in the District where new development will be supported on suitable sites within the urban area.
 6. The site is also subject to Policy DS28 which relates to publicly accessible open space and sports. The policy covers an extensive range of matters. Sub-paragraph 10 of the policy states that proposals for development which would result in the loss of any other types of publicly accessible open space as defined on the Policies Map will only be permitted in certain circumstances. This does not apply to the site as it is not publicly accessible open space. The

area has been fenced off with HERAS security fencing for more than 10 years and is not publicly accessible.

7. We therefore conclude that neither Policy SS3 nor Policy DS28 would preclude the development of this site in principle.
8. In our opinion, the Plan is not sound as it does not include a strategy which will deliver small and medium sized sites which NPPF paragraph 73 recognises as an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. In that respect, we consider that the Plan is not effective. The inclusion of this site which is available, suitable and deliverable, would provide faster and better-quality development than some of the proposed sites.
9. We propose a mixed development of housing and public open space for the site. The scale of the proposed built development at five storeys in height would be similar to the easternmost building in Barton Mill Road (Ripple Court).
10. The public open space and the children's equipped play areas proposed would become an important feature and focus for the nearby student village and for those who now occupy some of the blocks of former student accommodation as family homes to the east and south of the site as well as to those living in the very high density recent development at Barton Mill Road. It would also be an attractive stopping place on the Riverside Walk. And it would greatly add to the visual quality of the area and its effective functioning.
11. In summary, the allocation of this brownfield site in a sustainable location for a mixture of family accommodation and for public amenity space and equipped play area would assist in helping to address the deficit in the council's housing delivery and have the added benefit of creating an attractive amenity area along the Riverside Walk and a valuable focus and resource for those living nearby.
12. Our proposals will enable this site to be developed. It will result in significant environmental, social and economic benefits in accordance with the NPPF. Without an allocation we are concerned that the land will remain enclosed and unavailable for public use; an unkempt, untidy and unattractive element adjacent to existing residential accommodation and listed buildings.
13. The delivery of this proposal will bring forward real and positive benefits by helping to address an unmet need for additional housing, on a brownfield site

and by creating an imaginative, highly useable and attractive area of public open space and children's play areas.

14. For the reasons we have stated, we consider that the Plan is not positively prepared, not justified and not effective as a result of the council's failure to allocate this site for development. We therefore suggest a specific policy to be included in that part of the Local Plan containing the Canterbury urban area allocations. The wording of that policy could be as follows:

Site C.... Land at Sargeants Parade / Stour Promenade is allocated for residential development and public open space. Planning permission will be granted for development which meets the following criteria:

1. Development mix

Across the site, the development mix will include:

- a) Approximately 36 new apartments including affordable housing, accessible housing and an appropriate housing mix in line with policies DS1 and DS2.
- b) Proportionate contributions to community infrastructure in line with Policy DS15.
- c) Informal and equipped play space in line with Policy DS28.

2. Design and Layout

The design and layout of the site should provide a high quality built environment in line with Policy DS13 with an average net density of around 80 DPH.

3. Landscape and Green Infrastructure.

The green infrastructure strategy for the site should protect and enhance the existing trees adjacent to the site in line with Policy DS25 and provide the open space and equipped play area in the western part of the site.

4. Access and Transportation

Because of its highly sustainable location in relation to the city, the Riverside Walk and public transport on Sturry Road, the scheme shall be car-free with on-site operational car parking only.

15. We therefore ask the inspector to include an appropriate allocation for the site as an additional Policy within chapter 2 of the Local Plan.

Appendix 1 : Representation on Focussed Consultation, October 2025

Appendix 2 : Proposed Site Plan and Proposed Location Plan