

St. Peter's Residents' Association



Canterbury District draft revised Local Plan

St Peters Residents' Association (SPRA)

Response to the Regulation 19 public consultation - May 2026

Dear Sirs,

Canterbury Local Plan 2045 – Regulation 19 public consultation

Executive Summary

The St Peters Residents Association (SPRA) wishes to express its objection to one, only of the allocations in the draft Canterbury Local Plan This is **Allocation N8 for proposed development at the Miller's Field**

Expressed in the terms of the regulation 19 Consultation stage, the SPRA considers that, in this respect, the Draft local Plan is not sound and fails the three tests that are, apparently, the focus of this stage of the Consultation Process. these being:

- Effectiveness by reference to deliverability

In respect to this site, in particular, the inherent unsuitability of this site and the constraints placed on the site by its geographical location, its vulnerability to flooding and the potential impact on surrounding trees and on the view of the World Heritage Site means that the site is not deliverable.

- Justification

Although the council is pursuing a "brownfield first" approach to finding sites of development in the city, this site is inherently not a brownfield site due to its location within part of the Stour Riverside Park , a string of green spaces created by the City Council pursuant to its planning policies since 1973.

The allocation of the site for development takes no account of the impact on green spaces and the trees surrounding site which will inevitably be forced to be cut down were the site to be developed in any manner. This is contrary to the councils objectives for ensuring environmental protection and pursuing its climate action agenda.

The allocation has not been considered in the context of the councils policies protecting the views of the World Heritage site, in this case a view of the Cathedral through the trees on the field from North Lane, an iconic view of the Cathedral that was first recognised by the pioneer photographer Fox-Talbot in 1845.

The policy allocating this site for development was not subjected to any form of meaningful public consultation. Although the site was 1st announced as a part of the regulation 18 consultation last autumn, the societies objections and reasoned arguments against the proposed allocation was not properly reported to the planning committee and not considered by them prior the publication of the Regulation 19 consultation draft or afterwards.

- Sustainability of development
 - this proposal fails the test of sustainability, since it would lead to the felling of the surrounding trees and would interfere with the wider wildlife corridor along the river great Stour of which the Miller's field forms an important part. Development here would block the free movement of wildlife along river causing environmental harm.

The St Peters Residents Association (SPRA) last made comments on the Canterbury City Council Local plan 2040 in October 2025.

This was a response to the Councils focused consultation on the local plan at the Regulation 18 stage.

The St Peters Residents Association is a local amenity group focused on the interests of people living only in a part of the city centre extending from St Peters Street through to Northgate, including the Blackfriars and St Radigunds areas,

Given our involvement only in part of the city centre, we previously did not involve ourselves in commenting on the wider aspects of the local plan, the various housing allocations proposed around the city and other wider aspects applicable to the city as a whole.

Our main concern therefore was only with one of the allocations falling within the area of the city that is within the purview of the SPRA. This is the proposed allocation N8 at Millers Field.

At that time the Association was shocked to see the Miller's Field allocated as a potential development site.

We submitted a strong objection to this proposed allocation, citing the following reasons why we considered that the site should not be allocated as a development site these including:

That the site is not actually a brownfield site, but actually a public park area associated with the Riverside walk, on which imposed a small surface car park.

That the space at the Miller's Field as part of a string of open spaces and pathways along the rivers Stour created as a result of council policy since the 1970s encouraging the creation of a Riverside Park, a string of footpaths and open spaces all along the river, which had its origins in a 1973 planning document '*Riverside Area Footpaths and Recreation*', an objective which has largely been achieved. We argued that development of the site would undo this established amenity.

We also pointed out practical reasons why the site was not suitable development, these including:

- The fact that the site is within the river floodplain, zone 3, and that this would force the development high up out of the grounds.
- That the site was surrounded by trees which would limit the potential for development or alternatively bring about the felling of the trees around the site.
- We also pointed out that despite the trees, there is still a spectacular view of the Cathedral from North Lane, visible through the trees in the winter and that development on the site would irrevocably destroy this view of the World Heritage Site.

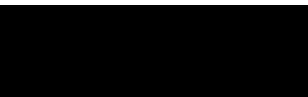
This was a fresh proposal introduced last summer without any form of previous public consultation and the Regulation 18 consultation was the first opportunity that the Association had to mount any sort of objection to the proposal.

The results of the Regulation 18 consultation were put to the planning committee this February, and the SPRA were disturbed to note at that time that our carefully reasoned objections to this proposed allocation were not included in the council's report on the results of the October 2025 consultation and that councillors were not made aware of our objection at the time when they decided on the Regulation 19 Consultation.. As far as we are aware councillors are still unaware of the Associations fundamental objection to this proposed allocation.

In addition, the practical obstacles to the development of this site were also not reported to the planning committee, and in particular, no mention was made to the fact that proposed development on this site would be fundamentally at odds with the council's planning policies to protect the setting of the World Heritage Site.

For this reason, the proposed Allocation N8 appears to be fundamentally unsound, and the St Peters Association would wish to register its objection to this proposal at this the Regulation 19 stage and wishes to reserve its right to present our objections to the planning inspector at the Public Enquiry to be held on the Canterbury Local Plan to be held later this year

Yours Sincerely



Chair - St Peters Residents Association

About The St Peters Residents' Association. (SPRA)

The St Peters Residents Association incorporates the former Blackfriars and Northgate Associations and was established in the early 1980s with the aim of improving the local environment, by taking an interest in all matters affecting the amenity of the area, in particular, commenting on planning applications, licensing matters and working with the local Neighbourhood Watch Committee.

The Association organises social events such as barbecues, quizzes, Christmas parties and arranges occasional lectures on subjects of local interest.

The Association publishes a bi-monthly newsletter distributed to all residents.

The membership is currently 125 households.

The Association covers the area from St Peters Street 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.