

Canterbury City Council Local Plan Regulation 19 Pre-Submission Consultation

Rosemary Lane, Canterbury

Representation submitted on behalf of Paul Roberts
Development Ltd

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1. We submit these representations in connection with the Rosemary Lane car park, which is identified on the Canterbury City Centre Key Diagram on page 26 both as a development / regeneration / open space opportunity site and also as a carried forward 2017 Local Plan housing allocation. Page 27 identifies Rosemary Lane car park as a regeneration opportunity area. It is also specifically identified in Policy CF2 – housing allocations – on page 326 as an allocation carried forward from the 2017 Local Plan with a “residential yield” of 20 homes. In fact, it has been included as a housing allocation in Local Plans for around 40 years.
 2. In 2022 the council invited bids to purchase 5 car parks within the city, including the Rosemary Lane car park. Paul Roberts Development Ltd was successful in its bid for Rosemary Lane and entered into an option agreement with the council. I attach the documents which were submitted with that bid and involving a co-living scheme. This provided the council with a thorough explanation of the proposals for the site. We considered it logical and reasonable to assume that acceptance of the bid was acceptance by the council as landowner and local planning authority of this specific proposal for shared / co-living, at least in principle.
 3. In October 2025 the council undertook a focussed consultation on its draft Local Plan and I attach the short covering email, together with the two bid documents which we submitted in relation to that.
 4. However, surprisingly, the council has chosen not to amend the development allocation but instead has carried forward the archaic allocation for 20 residential units.
 5. Paul Roberts Development Ltd is under an obligation from the city council as current landowner to submit an application and progress towards the acquisition of the site. As a result, an application for a co-living scheme was submitted to the council in March 2026 (reference CA/26/00495).
 6. We are concerned that by continuing with the outdated allocation for 20 homes, the Plan is unsound.
 7. We consider that it is not positively prepared. The Plan fails to meet the objectively assessed housing need by not taking advantage of the opportunity to significantly boost the supply of homes and to address the needs of a particular group with specific housing requirements.

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8. Paragraph 61 of the NPPF explains how the government's objective of significantly boosting the supply of homes can be achieved with a sufficient amount and variety of land coming forward so that the needs of groups with specific housing requirements are addressed. It goes on to say that the overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.
 9. We attach the Knight Frank Co-Living Demand Study Report from November 2024 and their subsequent co-living demand letter dated 09 March 2026. This identified an increase in the number of private rented sector (PRS) households in Canterbury (previously 15,538 and now 16,205) and an increase in the number of PRS sharer individuals (previously 9,448 and now 9,803). The letter predicted an increase in the number of new PRS sharer individuals by 2031 (previously 1,039 from 2023 to 2028 and now 1,339 from 2026 to 2031). The letter points out that there has been no change in co-living supply which still remains as zero. As a result, there is a larger shortfall of co-living homes in Canterbury (previously 9,448 and now 9,803). They also report upon the projected shortfall increasing from 10,488 from 2023 to 2028 and now 11,142 from 2026 to 2031). As a result, these significant shortfalls will be partly addressed by this co-living accommodation scheme at Rosemary Lane and also within the twenty room annex to it at St Johns Lane which is also the subject of a contemporaneous planning application and representation against the Regulation 19 draft Local Plan.
 10. The sale of the site to the developer will provide substantial funds to the city council to assist in the provision of its functions and services. This is particularly important at a time of considerable financial constraints on local government funding.
 11. We are concerned that the allocation of the site for twenty homes which was first included in the Development Plan in the 1980s has simply been carried forward without any apparent further consideration in subsequent Development Plans and in the latest draft Local Plan. This has occurred without apparent regard to paragraph 127 of the NPPF which requires planning policies and decisions to reflect changes in the demand for land, including reallocating the land for a more deliverable use that can help to address identified needs (paragraph 127(a)) and support alternative uses on the land where the proposed use would contribute to meeting an unmet need for development in the area. This paragraph comments that planning policies and decisions should support:

(a) development that makes efficient use of land and the availability of land suitable for accommodating it.

12. The proposals meet the key objectives of these policies by making effective use of previously developed land in a highly sustainable location within Canterbury. The proposed development makes very effective use of a brownfield site with 146 co-living units, meeting a particularly strong need for rental accommodation for sharers. As stated within the co-living Demand Report of November 2024 and the March 2026 demand letter, both prepared by Knight Frank, the scheme will relieve pressure on existing housing stock; offer greater choice of housing types for renters; divert demand away from HMOs; release lower cost HMOs for those on lower incomes and release HMO and sharer stock delivering it back to single household occupants, including families.
13. A co-living development would be a sustainable development, contributing to the economic objectives of sustainable development by creating construction jobs, additional operational jobs within the scheme and providing accommodation for economically active households. In terms of the social objectives it will provide housing units, providing much needed homes to meet a specific demand within a district which has been unable to meet its housing delivery target.
14. This is the first co-living scheme in Canterbury. However, there have been several in London. The London Plan contains a specific policy relating to shared / co-living, Policy H16. Paragraph 4.1.9 indicates a ratio of 1.8:1 persons within a co-living scheme being the equivalent of one single home. On that basis, 146 residential units in the proposed co-living scheme will deliver the equivalent of 81 homes. Even with the more widely used ratio of 2.4 persons per home, the scheme would be the equivalent of 62 homes. Either way, this is a significant contribution towards meeting housing need and, as explained in the Knight Frank Co-Living Demand Report and Demand Letter, the residents who will occupy the co-living accommodation would otherwise occupy HMOs or be unable to leave family homes and begin an independent life. By providing this co-living accommodation, family sized housing is freed up and made available particularly for families.
15. In relation to the environmental objective, it makes effective use of brownfield land and transforms the site from a gaping gap to a very attractive building which responds positively to the key characteristics of this part of the Canterbury Conservation Area. In addition, the proposals will remove a 103 vehicle public car park, open 24/7 all year round. In its place will be a car-free

scheme with two operational car parking spaces. The proposals will significantly reduce vehicle movements to and from this part of the city with significant environmental benefits including improvements to air quality and supporting a move towards more sustainable methods of travel.

16. We provided a detailed heritage assessment to accompany our planning application and liaised with Historic England who have submitted their comments on the application (see the attached representation dated 29.04.26).
17. On this issue of principle, the application site is brownfield, located in a highly sustainable location within the city walls of Canterbury. The land has been a long term residential allocation in several adopted Local Plans. The city council offered the site for sale for redevelopment and accepted the applicant's offer to redevelop the site for co-living. The council has failed to meet its housing delivery target. The proposals will deliver much needed residential accommodation for private rented sector sharers where there is a substantial shortfall of such provision. As a result, it would relieve pressure on the existing housing stock, offer greater choice of housing types for renters, divert demand away from HMOs and release HMOs back to single household occupants including families. The proposals will result in substantial economic, social and environmental benefits, meeting the overarching objectives for achieving sustainable development as set out in the NPPF and the CDLP. These factors demonstrate that the development of the site for a co-living scheme is acceptable in principle.
18. We suggest the inclusion of a district-wide strategic policy which would enable the delivery of the Rosemary Lane car park site as a scheme for shared / co-living and which would deliver a considerable number of benefits including:
 - The creation of an attractive, appropriately designed and detailed scheme which will transform the site and enhance the character and appearance of its surroundings and this part of the Canterbury Conservation Area. The heritage benefits of the proposal are explained both in the DAS and in the HS.
 - There will be environmental benefits by removing a public car park and reducing vehicle flows to and from this part of the city.
 - The site itself has significant sustainability credentials. It is brownfield, in a highly sustainable location with easy access to a wide range of city centre facilities including employment, retail, recreation, bus and rail links.
 - Relieving pressure on existing housing stock.

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- Offering greater choice of housing types for renters.
 - Diverting demand away from HMOs.
 - Releasing lower cost HMOs for those on lower incomes.
 - Releasing HMO and sharer stock back to single household occupants including families.
 - The development will create much needed housing in a district which is unable to meet its housing delivery target and for groups within the population which are currently under-provided for.
 - There will be a significant contribution to the local economy during the construction period. Jobs will be created in construction. Building materials will be purchased from local suppliers. Those jobs in construction will extend over a likely development period of about two years.
 - In addition, the proposals will provide around 7 full time equivalent permanent jobs within the co-living scheme itself in areas such as reception, supervision and management, cleaning and maintenance.
19. Future occupiers of the co-living scheme will support local services and contribute to the local economy. There will also be social benefits by the introduction of new households.
20. These heritage, social, economic and environmental benefits weigh heavily on the positive side of the planning balance.
21. We therefore consider that the failure of the council to allocate this site for co-living is flawed, out of date and ignores the relevant evidence of need.
22. And because of its failure to allocate the site, and because this is a site which is available, suitable and deliverable, we consider that the Plan in this respect is not effective. Finally, it is not consistent with the NPPF which encourages brownfield development, sustainable development and proposals which address the needs of groups with specific housing requirements.
23. These specific criticisms of the soundness of the draft Local Plan could be addressed by the suggested district-wide strategic policy to be included in chapter 6 of the Local Plan:

Policy DS.... Large-scale purpose-built shared/co-living

A large-scale purpose-built shared living development must meet the following criteria

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- 1) it is of good quality and design
 - 2) it contributes towards mixed and inclusive neighbourhoods
 - 3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency
 - 4) it is under single management
 - 5) its units are all for rent with minimum tenancy lengths of no less than three months
 - 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
 - a) convenient access to a communal kitchen
 - b) outside communal amenity space (roof terrace and / or garden)
 - c) internal communal amenity space (dining rooms lounges)
 - d) laundry and drying facilities
 - e) a concierge
 - f) bedding and linen changing and / or room cleaning services
 - 7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes.
 - 8) a management plan is provided with the application.
24. In addition, the Rosemary Lane car park should be the subject of a specific Canterbury based policy as a development allocation with wording similar to the above suggested policy.
25. We invite the inspector to modify the Local Plan to include both a district-wide strategic policy and a specific development allocation with similar wording for the Rosemary Lane car park site.

Appendices :

Representation on Focussed Consultation, October 2025

2022 car park bid documentation including (please note the documents listed below were appended to our representation on the Focussed Consultation, dated October 2025):

- Supporting Statement
- Presentation

The following supporting documentation for CA/26/00495

- Knight Frank Co-Living Demand Study dated 27.11.24
- Knight Frank Co-Living Demand Study Addendum Letter 04.03.26
- Historic England representation dated 29.04.26
- Design and Access Statement