

Canterbury City Council Local Plan Regulation 19 Pre-Submission Consultation

St Johns Lane, Canterbury

Representation submitted on behalf of Paul Roberts
Development Ltd

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We submit these representations in connection with the St Johns Lane car park which is shown on the Canterbury City Centre Key Diagram on page 26 of the

Regulation 19 draft Local Plan as a carried forward 2017 Local Plan housing allocation. It is then carried forward in Policy CF2 as a housing allocation with an identified residential yield for 5 homes.

1. In 2022 the council invited bids to purchase 5 car parks within the city, including the Rosemary Lane and St Johns Lane car parks. Paul Roberts Development Ltd was successful in its bid for both and entered into option agreements with the council.
2. Paul Roberts Development Ltd is under an obligation from the city council as current landowner to submit planning applications and progress towards the acquisition of both sites. As a result, an application for an annex to the Rosemary Lane car park co-living scheme was submitted to the Council in March 2026 (reference CA/26/00495 – the Rosemary Lane Scheme) and (reference CA/26/00496 – the St Johns Lane scheme). The two schemes are linked with the 146 room co-living scheme at Rosemary Lane providing all the support facilities for both schemes.
3. As a result, we consider that the historic housing allocations for both sites are outdated and do not reflect the current policies, demographic and housing needs.
4. We are concerned that by continuing with the outdated allocation for 5 homes at St Johns Lane, the Plan is unsound. We also consider that the Plan is not positively prepared. It 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.
5. 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.
6. 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 the co-living accommodation schemes at Rosemary Lane (which is also the subject of a contemporaneous planning application, CA/26/00495, and representation against the Regulation 19 draft Local Plan) and within the 20 room annex to it at St Johns Lane.

7. 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.
8. We are concerned that the allocation of the site for 5 homes 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.
9. 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 20 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.

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10. 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.
 11. The proposals for Rosemary Lane and St Johns Lane are the first co-living schemes in Canterbury. 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.
 12. 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 12 vehicle business 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 reduce vehicle movements to and from this part of the city with environmental benefits including improvements to air quality and supporting a move towards more sustainable methods of travel.
 13. We suggest the inclusion of a district-wide strategic policy which would enable the delivery of shared / co-living schemes throughout the district including this scheme and the Rosemary Lane car park scheme. More specifically, the St Johns Lane scheme delivers significant benefits similar to those of the Rosemary Lane car park scheme, including the following:
 - The creation of an attractive, appropriately designed and detailed scheme which will transform the site and enhance the character and appearance of the surroundings and this part of the Canterbury Conservation Area.
 - There will be environmental benefits by removing a 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.

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- Relieving pressure on existing housing stock.
 - 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 result in full time equivalent permanent jobs within the co-living scheme itself in areas such as reception, supervision and management, cleaning and maintenance.
 - Future occupiers of this co-living annex will support local services and contribute to the local economy.
14. These heritage, social, economic and environmental benefits weigh heavily on the positive side of the planning balance.
15. We therefore consider that the continuation of the allocation of this site for 5 homes is flawed, out of date and ignores the relevant evidence of need. Because of the Council's failure to re-consider the allocation of the site, and because this is a site which is available, suitable and deliverable, we consider that the Plan is not effective. Finally, the draft allocation for 5 homes is not consistent with the NPPF which encourages making effective use of brownfield sites, sustainable development and proposals which address the needs of groups with specific housing requirements.
16. The replacement of the existing draft allocation for 5 homes with a more flexible allocation would enable the delivery of a higher density residential scheme, including a co-living annex scheme of 20 units.

Appendices :

Site plan and 3D images

The following supporting documentation for CA/26/00496

- Knight Frank Co-Living Demand Study dated 27.11.24
- Knight Frank Co-Living Demand Study Addendum Letter 04.03.26