

Canterbury City Council,
Military Road
Canterbury
CT1 1YW

6 August 2021

Our Ref: 20/5429

Dear Sir / Madam,

**Re: Regulation 18 draft Local Plan
Representations of behalf of Blueberry Homes**

On behalf of our client, Blueberry Homes, we write in respect of the current draft Local Plan vision and options consultation, running to 9th August 2021, through which the Council is inviting comments on. The new Local Plan for Canterbury will set the blueprint for development up to 2040. Blueberry Homes have an interest in Land at Simmonds Road, Canterbury (hereinafter referred to as “the Site”), having submitted representations as part of the Council’s Call for Sites Consultation that closed 9th July 2021. We comment below on several policies in the vision and options consultation.

Draft vision and growth options

The draft Local Plan embraces the opportunity for growth. We support the preferred growth option which seeks the delivery of 14,000 to 17,000 new homes across the district, with Canterbury City at the heart of the vision. We agree that sustainable growth should be centred around the economic hub of the district, alongside expansions to public transport infrastructure. New homes will be supported, alongside other matters, by new community infrastructure, improvements to public spaces and a focus on sustainable transport modes. We support the Council’s objective to take a proactive role in contributing towards and improving public realm to create vibrant, mixed-use and healthy communities.

Housing and New Communities

Option HNC2C (preferred option): maximise opportunities for delivery of small and medium sites to deliver new homes

We strongly support a proactive approach to identifying opportunities for small and medium sites, with additional policy support for windfall and intensified growth within urban areas. As set out in the evidence, small and medium sized sites have a range of benefits including (generally) fewer major infrastructure requirements and the ability to be built out quicker, thereby supporting the acceleration of housing delivery and other specialist accommodation in sustainable locations. They also offer support to SMEs which are often local businesses.

Option HNC3B (preferred option): maximise opportunities for delivery of suitable brownfield and regeneration developments

We strongly support the pro-brownfield regeneration approach to growth in suitable locations for new developments. This aligns with Paragraph 119 of the National Planning Policy Framework (NPPF) (2021) which states that strategic policies should

Directors
Helen Cuthbert | Stuart Slatter | Claire Temple | Alastair Close
Dan Templeton
Associate Directors
Katie Turvey | Heather Vickers | Alan Williams

Consultant
Lorna Byrne
Associates
Sally Arnold | Rob Scadding | Penny Moss | Sam Deegan | Paul Galgey
Niall Hanrahan | Phil Marsden | Charlotte Perry | Charlotte Hunter

set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land. Specifically, Paragraph 120 (c) outlines that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Land at Simmonds Road, which was the subject of our earlier Call for Sites Representations, is a vacant brownfield site that is sustainably located close to city centre amenities, and so aligns with the brownfield-first development criteria of the NPPF. Further, the Site is heavily contaminated due to its historic use as a gas holder. Therefore, any redevelopment will allow for the remediation of this well located, brownfield site, in accordance with national objectives.

Option HNC4C (preferred option): set specific densities, or a range of densities, for areas of the district to make best use of the land. Site allocation densities would be influenced by the local distinctiveness and character so that housing fits in with surroundings

We support the preferred option of setting appropriate densities for site allocations or proposals to meet in different parts of the district, reflecting area-specific characteristics, including optimising development potential on sites at or close to town centres. This is in accordance with Paragraph 125 of the NPPF (2021) which states that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. Specifically, part (b) notes that it may be appropriate to seek for a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.

Option HNC7C (preferred option) – embed master plans and design requirements for strategic development sites in the Local Plan, and continue current design criteria based approach for other sites and types of development; setting out when specific design tools like design codes should be used

We strongly support the principles of this option in setting out a framework to deliver high-quality design and developments, aligning with the national planning agenda of "Building Better, Building Beautiful".

Option HNC11C (preferred option) – provide purpose built student accommodation on or near campus, for example a 5-10 minute walk, but also have some flexibility on alternative locations subject to strict criteria

The evidence sets out that the District has one of the highest ratios of students to permanent residents in England at 16.4%, compared to a national average of 6%. With the expectation that academic spaces will grow, supporting a larger student population, it is a reasonable assumption that more accommodation will be needed. The preferred policy of exercising flexibility on alternative locations would not only support the growth of student accommodation to meet identified needs, but also offers greater opportunity to regenerate more peripheral brownfield sites, breathing new life into overlooked parts of the urban area.

We agree that it is for applicants to demonstrate why their site is suitable for the proposed use and to demonstrate its appropriateness as a location for student accommodation, taking account of access to services and transport infrastructure.

Initial feasibility work suggests that Land at Simmonds Road, subject of earlier Call for Sites representations, could accommodate a PBSA scheme comprising a mix of accommodation including cluster bedrooms, standard studios and accessible studios, providing in the region of 280 rooms to help meet identified PBSA needs. The Site is in a well-located, prominent location, with good access to the universities, including the new Christchurch University, and can be supported with high-quality public realm to create a "destination" for students, whilst contributing to the wider placemaking of the surrounding area.

Employment and the Local Economy

Option EMP1C – (preferred option) Retain the most deliverable sites from the current economic strategy and land allocations, consider mixed use development opportunities at other existing sites and potential for alternative sites more aligned to market needs; provide more flexibility for existing employment areas to grow and intensify

We strongly support pursuing opportunities to make more intelligent use of existing employment sites as a core spatial planning principle. We also strongly support the pursuit of suitable opportunities to deliver mixed use development, including employment and industrial uses, which presents opportunities to optimise the output of available land, subject to design considerations and managing the interface between uses. A flexible approach to the type and nature of industrial land uses is supported, facilitating adaptation to changing and emerging trends across the plan period.

Sustainability

We strongly agree with the Council's objective that planning decisions should contribute to national and corporate objectives for addressing climate change by shaping new and existing development in ways that reduce carbon emissions and build resilience. Land at Simmonds Road would seek to embed sustainable design principles within any redevelopment of the Site, including the use of Modern Methods of Construction.

Movement and Transport

We strongly agree with the sustainable principles set out in the preferred options for movement and transport to reduce the dependence on the private car, provide for healthy, inclusive and safe place and support greater use of public transport and more sustainable modes of transport.

Option MT1B (preferred option): all new developments must show that they will maximise opportunities for walking and cycling

Specifically, we support opportunities to enhance the quality of, and access to, the walking and cycling network as part of development proposals. Developments would be expected to show best practice in design for cyclists and make sure the layout is fully accessible, provide appropriate access to cycle storage in line with parking standards and encourage walking for short trips. Land at Simmonds Road has a cycle route (part of the national cycle network) running over it that is currently let to Canterbury City Council. Connectivity routes in and around the site would be greatly improved as part of any redevelopment.

Conclusion

Overall, we consider that the Preferred Options set out a positive and proactive growth agenda that provides a strong foundation to deliver growth to the District. We would be happy to discuss further and look forward to engaging further in the Borough's preparation of a new Local Plan.

Please do not hesitate to contact me if you require any further information.

Yours sincerely,



Katy Lister

Assistant Planner

Planning Potential

London

Enc.