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Canterbury City Council,
Military Road
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17th May 2024

JW/NP– 20/162

Dear Local Plan Team,

REPRESENTATIONS TO THE REVISED CANTERBURY DISTRICT LOCAL PLAN REGULATION 18 CONSULTATION IN RESPECT OF 43-45 ST GEORGE'S PLACE (SLAA099)

On behalf of Quinn Estates Ltd ('QE'), Iceni Projects welcomes the opportunity to submit representations to the revised draft Canterbury District Local Plan 2040 (Regulation 18 Consultation). This representation is made in respect of draft Policy C2 - 43-45 St George's Place (also referred to as 'the Site'). It follows a representation made in January 22 in response to CCC's earlier Reg 18 consultation on its initial draft Local Plan to 2045. The Site was originally put forward in Canterbury City Council's Call for Sites and was assessed in the SHLAA review process under SLAA099.

QE are pleased to see that the Council continues to consider the Site suitable for allocated for a mixed-use development to support the District's housing and retail floorspace needs over the next plan period.

In response to the outcomes of the Reg 18 Draft Local Plan, this letter provides support overall for Policy C2, but also details why QE considers that the proposed quantum of 'approximately 50 new dwellings' does not encourage an effective use of land and should be updated to require 'approximately 70 new dwellings'. Additionally, changes are proposed to ensure that the scheme, and other brownfield schemes alike, will be viable in terms of Affordable Housing Provision.

Canterbury is the District's most sustainable settlement in planning terms. Draft Policy SS3 states that Canterbury shall be the principle focus for new development in the District. Given a heavy reliance on greenfield land to deliver much of the District's growth, the importance of maximising housing delivery on brownfield sites located in the most sustainable locations cannot be overstated. Accordingly, the site's development capacity should be optimised. Through an iterative design process and corresponding Local Plan allocation, QE considers that the Site could justifiably support around 70 new homes and 200sqm of commercial floorspace in light of its surrounding context. This is a valuable opportunity to provide housing within a landmark building in a location with excellent access to essential services and the ability for residents to lead highly sustainable living and working patterns. This could be achieved without creating significant adverse harm on either the Cityscape or surrounding amenity.

a. Site Context

The Site is located within Canterbury City Centre and sits just off St. George's Roundabout on the corner of St. George's Place (A257) and Upper Bridge Street. The Site is 0.15ha in size and contains a single existing two-three storey building incorporating a brick frontage. Bigglestone Link connects St. George's Place and Dover Street immediately to the north of the Site, with the St George's subway located further beyond the red line boundary.

The existing lawful use of the Site is for a Cinema (Use Class D2) with a Café at ground floor level (Use Class A1). The current use of the Site is no longer feasible however, given viability issues associated with the business and the development of a new five screen cinema as part of the new leisure quarter within the Canterbury Riverside development.

The Canterbury Conservation Area Appraisal (2010) identifies that the Site falls within the northern edge of the Oaten Hill and Old Dover Road Conservation Area. The Appraisal does not identify the building as one of importance, local significance, or of interest on the street. The surrounding area is mixed-use in character, and therefore a sensitive redevelopment of the Site is unlikely to generate harmful effects to the surrounding street scene.

In terms of scale, it should be noted that nearby buildings include the CCCU student accommodation and block at 41 St George's Place which stands at 5 storeys; the Charter House building opposite The Site which has consent for works taking it to 5 storeys; and Newingate House which stands at 5 storeys.

The Site is highly suited to mixed-use development, being close to a number of amenities including a supermarket; restaurants; bars; takeaways; places of work; and places of worship and education. Despite this, the area is highly residential, being characterised by two storey terraced houses, many of which having town centre uses at ground floor with residential uses above.

Along with the majority of the District, the Site falls within the Stodmarsh Catchment Area and therefore would be required to demonstrate Nutrient Neutrality. However, the Site is not directly subject to any other planning constraints and therefore is highly suited for redevelopment.

b. Requested changes to Policy C2, Policy DS21 and Policy DS1

Whilst QE fully supports the Council's decision to allocate the Site for a mixed-use development, it is considered that the wording to the relevant policy could and should be amended to encourage the most effective use of the Site, and ensure that it is viable and achievable.

Quantum

As part of the original land promotion, QE stated that the Site has the capacity to support approximately 88 dwellings, whilst the SLAA assessed this capacity to be 53. The reason given in the SLAA for the reduced yield was that the sensitivity of the Site in the surrounding context limited achievable heights to 4 storeys. This factor, combined with the 4,800sqm floor area and a minimum unit size of 72sqm, indicated a reduced capacity upon initial calculations. However, the SLAA did acknowledge that with the right design and layout, the identified yield could be improved to meet even greater needs.

Whilst Quinn recognise that the original projected quantum of 88 may not be achievable given the outcomes of the SLAA, it is strongly considered that with the appropriate design/layout, the Site has the capacity to accommodate approximately 70 dwellings. QE respectfully suggests that given the context of surrounding buildings in the immediate vicinity and given the Site occupies a 'book-end' location at the corner of a prominent roundabout, an increased yield is justified on the basis that a 5 storey building occupying the site would be more appropriate.

Therefore, to make the most effective use of the Site, and to reflect the outcomes of the SLAA, it is suggested that the wording of Policy C2 in respect to the quantum be changed from 'approximately 50 new dwellings' to 'approximately 70 new dwellings'.

As noted above, whilst it is important that the new plan delivers a wide range of homes across a wide variety of locations, the vast majority of the District's new homes will inevitably come forward on greenfield land. Therefore, this highlights the importance of maximising the less common (and more sustainable) opportunities of building new homes on brownfield land, which typically are of lower biodiversity value and located within the heart of the District's most sustainable settlements. This is in accordance with paragraph 123 of the NPPF, which encourages Council's to promote making the most effective use of previously developed land. Furthermore, it is important to recognise that the costs of redeveloping brownfield land are typically higher, and therefore opportunities to improve the overall viability of such allocations should be given serious consideration. Accordingly, Quinn Estates

respectfully ask the Council to reconsider the quantum of the Site afresh in order to align with these objectives and help optimise the development capacity of such a suitable redevelopment site.

Policy DS21 - Biodiversity Net Gain

Part 3(b) of Policy C2 states that the site must provide 20% biodiversity net gain, in line with Policy DS21. Following initial investigations into viability, QE considers that the doubling of the requirement will affect the overall deliverability of the scheme. Additionally, this target is not evidence-based, and the national BNG target of 10%, set by the National Government, is wholly sufficient to achieve the objectives set out within Paragraph 174(d) of the NPPF and the goals of the Environment Act.

QE considers that Requirement of 20% BNG within Policy should be amended so that the Council instead work with developers to achieve the national minimum of 10%, and explore opportunities to go beyond this, where viable.

Viability

Part 1(a)(i) states that the scheme must deliver 30% affordable housing, in line with Policy DS1. QE believes that this aspect of Policy C2 should be tested further to account for the unique circumstances related to brownfield redevelopment. In the case of this Site, Vacant Building Credit would apply given that the proposal would create a lawful use of existing floorspace, meaning that affordable housing provision would only be applicable to new floorspace provision. In addition, as opposed to greenfield development, the proposal will involve higher costs due to existing use values and demolition which are important factors for the overall viability of the scheme. As stated by Policy DS1 of the Draft Local Plan, Vacant Building Credit requests will be assessed on a site-by-site basis, where it can be demonstrated that the qualifying buildings are genuinely vacant.

Therefore, QE respectfully request that Policy C2 is amended to account for the additional costs and factors involved in brownfield redevelopment, and the potential for Vacant Building Credit to apply. Accordingly, QE asks that Part 1(a)(i) of Policy C2 be amended to reflect this, and acknowledge that Vacant Building Credit would apply to the scheme.

c. Conclusion

Quinn Estates Ltd is delighted that the Council has chosen to allocate the Site, and broadly supports the direction of Policy C2 within the Draft Local Plan. However, it is suggested that the wording relating to the desired quantum is modified to encourage the optimisation of the Site, from 'approximately 50 new dwellings', to 'approximately 70 new dwellings'. Additionally, changes are proposed to ensure the viability of the scheme.

As this letter has demonstrated, the Site is highly suitable for redevelopment and can help meet a range of housing and retail needs. The Site is positioned well within the District's most sustainable settlement, and would deliver homes in a location where residents can immediately access a range of amenities and work opportunities, without the need to travel by car. The Site is within a conservation area, however, the anticipated loss of the building or its redevelopment within the context of the surrounding area is not thought to pose any immediate concern. The site represents a highly sustainable form of development, that would reuse previously developed land and contribute to the rejuvenation of the City centre. As such, the Site presents a brilliant opportunity to deliver new homes, in a location where they are needed most, and opportunities to improve/optimize the site are therefore encouraged.

I trust that these comments will be taken into account to inform the next iteration of the draft Local Plan to 2045. If you have any questions about the above, do not hesitate to contact me.

Yours sincerely,



Nicholas Pellegram
Planner