



Da Vinci House  
44 Saffron Hill  
London EC1N 8FH  
tel: +44 (0)20 3640 8508  
fax: +44 (0)20 3435 4228  
email: info@iceniprojects.com  
web: www.iceniprojects.com

Planning and Development  
Canterbury City Council  
Military Road  
Canterbury  
CT1 1YW

31<sup>st</sup> May 2024

Dear Sir/Madam,

**REPRESENTATIONS TO THE REVISED CANTERBURY DISTRICT LOCAL PLAN 2040 (REG 18 CONSULTATION) – POLICY R3, LAND AT ASHFORD ROAD (EAST)**

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Iceni Projects Limited ('Iceni') is writing on behalf of our client, Quinn Estates (QE), to submit representations to the revised draft Canterbury District Local Plan 2040 (Regulation 18 Consultation). This representation follows a previous submission sent in the October 2022 consultation.

QE supports the continued allocation of Land at Ashford Road (East) within the revised Draft Local Plan for employment development under draft Policy R3 to assist with meeting the District's employment needs over the plan period to 2040. Nevertheless, as set out in more detail below, it is considered that the site allocation requires some refinement, particularly in light of the insertion of the draft allocation directly alongside – Land at Ashford Road (West) – under Draft Policy R4.

These representations should be considered alongside the following supporting documents appended to this letter:

- Appendix 1 – Transport/Access Assessment
- Appendix 2 – Site Access Sketch

**a. Site and Surroundings**

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The Site adjoins the existing settlement of Chartham and comprises approximately 0.37ha of unused land. Within the Site lies a small, dilapidated single storey building/shed. To the west, the Site is bound by the access track and curtilage of one residential dwelling, with spotted hedging along the western boundary of the Site. The southern boundary of the Site fronts the A28 (Ashford Road), a principal route leading into Canterbury from the surrounding area and the main route connecting Canterbury to Ashford. The southern boundary comprises some existing hedging to the south-east with gaps towards the south-west. To the north, the Site is bound by farmland, and the northern boundary of the site is undefined. To the east of the Site lies a car dealership, and beyond this a number of similar commercial premises which line both sides of the A28 (Ashford Road) which form Stour Valley Industrial Estate. To the West is a large plot of land with a bungalow on it. The bungalow is in close proximity to the Site boundary.

The Site is located within a largely commercial area, with nearby occupiers comprising several car dealerships, storage facilities, a garden centre, a timber merchant, and some leisure uses. To the west are several residential properties along the A28 which leads into the centre of Chartham village. Chartham is defined within the adopted Canterbury Local Plan 2017 as a Rural Service Centre and is a highly sustainable village where residents can meet most of their day-to-day needs within the settlement itself and is suitable for a scale of growth that supports its function. Facilities within the

village include a train station, two surgeries, a primary school, two convenience shops, two pubs, a post office, and sports facilities.

The Site is within Chartham Parish Council area, who are progressing a Neighbourhood Plan for the parish area and conducted a Call for Sites from 18<sup>th</sup> Feb – 1<sup>st</sup> April 2022. The timeline for the Neighbourhood Plan aims for adoption by Q2 of 2024.

#### **b. Policy R3 – Land at Ashford Road**

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QE supports the positive approach to growth in the District and considers that draft policy R3 – Land at Ashford Road (East) can assist in meeting rural employment floorspace needs given its strategic location located off the A28. The potential exists to create a development that is attractive to the market whilst ensuring that the impacts of commercial development and associated vehicle traffic are minimised away from residential communities, with vehicles able to gain immediate access to the primary highway network.

The site is available, suitable and achievable. There are no obvious barriers to delivery, including that there are no constraints on the site such as ecology, trees, flooding and heritage, and the site is not dependent on the delivery of infrastructure before coming forward.

QE also supports the addition of draft policy R4 – Land at Ashford Road (west). This would see the bungalow close to the boundary with the Site relocated, and commercial space introduced. The Local Plan evidence base supports highly suitable sites for employment such as the identified land at Ashford Road being proactively identified for development in the Plan. The approach is considered to be wholly consistent with the NPPF, which highlights in Para 81 that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach is also consistent with the requirements of Para 82 of the NPPF in proactively identifying the subject site, and Para 83 in making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. The policy allocation is also considered to be consistent with Paras 84 and 85, which promote supporting a prosperous local rural economy.

#### **c. Proposed Evolution of Allocation R3**

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Whilst the Plan constitutes an impressive and laudable detailed spatial strategy, somewhat inevitably for a document of this level of prescription and detail, there is a need to test the prescriptive infrastructure requirements of each development allocation through the Plan process to ensure that the draft policies are effective, flexible and suitable for the plan period. National planning policy guidance seeks plan makers to work in collaboration with the community, developers and other stakeholders to create realistic and deliverable policies and it is therefore sensible to consider the infrastructure requirements of Allocation R3 and whether these are correctly identified. This is particularly so given the allocation of draft policy R4 alongside.

The draft allocation criteria for Policy R3 is broadly supported in regard to development mix and design and layout. The amount of employment floorspace proposed is suitable for a site of this size and would relate to existing development in the area, particularly the adjoining commercial site to the east. The wording of 'commercial, business or compatible uses (such as a car showroom)' is welcomed, as it provides flexibility to ensure a suitable occupier can be found whilst simultaneously ensuring the end user is compatible with the character of the site and surrounding uses, particularly the residential property to the west. The site is currently being marketed by QE and has already received significant interest from potential occupiers who operate on a national basis.

However, QE would question whether the development criteria in regard to landscape and green infrastructure is appropriate for the site. In this regard, the allocation diagram includes an indicative location for an open space/landscape buffer along the northern, western, and southern boundaries of the Site. In addition, the policy wording at subsection 3 (d) proposes the Site retains an undeveloped section of land in the west of the Site which shall be landscaped appropriately to protect the amenity and privacy of existing neighbouring residents.

QE support the Council's ambition to enhance biodiversity within the District and the company has significant experience in delivering well-landscaped commercial developments that provide additional biodiversity benefits whilst also protecting neighbouring uses and minimising landscape harm. However, at 0.37ha, the allocation site is modest, and the extent of the proposed landscaping buffers have the potential to threaten delivery of vital employment floorspace and could be overly expansive for the amount of built development that can be accommodated on the site.

Given the allocation of the land to the west for commercial space, with the intended relocation of the bungalow, QE would therefore request that the Council works with QE to consider whether the green infrastructure has been correctly identified.

The development criteria for access and transportation proposes the use of the existing access serving the development to the east of the Site. Through conversations with potential occupiers, QE consider this element would inhibit the attractiveness of the site, as many occupiers would prefer a sole dedicated access. QE have undertaken a transport assessment which has been appended to this letter. The report investigates the suitability of a new access to the site from Ashford Road in terms of highway safety and demonstrates that such an access could be safely and successfully established in this location. The note concludes that safe and suitable access to the site could be secured either via the adjacent site to the east (as is assumed in the draft allocation) or via a simple priority access directly from the A28 Ashford Road. On the basis of the note, QE propose that draft policy wording is amended to reflect this. This is a further issue that QE proposes should be the subject of discussion through the Development Plan process.

#### **d. Summary**

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On behalf of QE, we thank you for the opportunity to input into the Canterbury District Local Plan Regulation 18 Consultation.

As detailed above, the Land at Ashford Road identified under Allocation R3 is a deliverable and sustainable site and should remain allocated in the emerging Local Plan for employment development. Quinn Estates support the allocation and considers that the draft policy wording largely supports the site coming forward for development.

The location and extent of the proposed landscaping areas should be thoroughly investigated to strike an appropriate balance between minimising landscape impact and optimising the development potential of the site, whilst further consideration should be given to the allocation supporting a new dedicated vehicular and pedestrian access from Ashford Road to enhance the suitability of the site for commercial development whilst delivering a safe and well-designed access. These two minor alterations to the policy would significantly enhance the site's attractiveness to potential occupiers, which would, in turn, support the delivery of rural employment floorspace.

I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. We also confirm that we would like to be involved in future stages of the plan-making process. However, should you require any further information, please do not hesitate to contact me on [REDACTED] or [REDACTED]

Yours sincerely,

Nick Pellegrin  
Planner