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Canterbury City Council
Council Offices
Military Rd
Canterbury
CT1 1YW

29 May 2024

Dear Sir / Madam,

REPRESENTATIONS TO THE REVISED CANTERBURY DISTRICT LOCAL PLAN (REG 18) CONSULTATION – SLAA129 HOPLANDS EAST, ISLAND ROAD, HERSDEN

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 is one of the leading and most prominent developers in Canterbury, with the company having successfully delivered a considerable proportion of the District's residential and commercial development over the past decade. The company also has extensive land interests in the District for a range of high quality future development projects of differing scale and complexity. Economic, social and environmental growth and regeneration underpin all of QE's projects and the company always strives to work with local communities and the City Council to deliver transformational development that unlocks growth and inward investment into the District to forge significant societal benefits.

These representations relate specifically to a landholding at Hoplands East ('the Site'), for which Quinn Estates Ltd is the landowner and are submitted in tandem with an overarching representation that responds to strategic and development management policies in the Draft Local Plan. The Site has been subject to SHLAA assessment under SHLAA129.

The Site is a strategically located greenfield site located in the heart of Hersden. An extant planning permission for a sustainable extension covers the Site and wider lands beyond it and in this regard, this planning permission (application ref. CA/16/00404/OUT) enables the Site to be developed for up to 5,572sqm of business floorspace. The land has been identified as part of a strategic site within the draft Local Plan, with the settlement boundary for Hersden proposed to be altered to incorporate the strategic site.

We trust that the comments provided below will be taken into consideration and afforded the appropriate level of weight in the next stages of the draft Local Plan. Addressing the comments set out within these representations is necessary to ensure that the Local Plan reflects the appropriate needs of the surrounding area.

The Site and Surrounding Context

The Site is 2.32ha in size and is located to the south of Island Road in Hersden, and to the west of Lakesview Business Park. The site is part of a larger development site called Hoplands, which was granted outline planning permission under permission ref: CA/16/00404/OUT for:

"Outline planning application for a neighbourhood extension for the creation of up to 250 houses included affordable housing, neighbourhood centre (comprising Class A1 foodstore (400sq.m), Class D1 medical centre (380sq.m), Class D1 dentist

(150sq.m), Class A1 pharmacy (150sq.m), Class D1 nursery (120sq.m) and Class A1 convenience retail (360sq.m)), commercial estate (comprising Class B1 business floorspace (up to 5572sq.m), Class D1 apprenticeship centre (616sq.m) and Class D1/D2 community building (up to 672sq.m)), parish parkland and associated access, parking, amenity space and landscaping.”

The Site subject of this representation benefits from this extant permission, with the permission enabling business floorspace to be delivered on this site, as part of the wider mixed-use permission, given in detail above.

A subsequent Reserved Matters application (planning ref: CA/21/01136) has been approved in October 2023 for

“Application for approval of reserved matters relating to access, appearance, landscaping, layout and scale for the provision of a Business Campus comprising approximately 5,400sqm (GIA) pursuant to outline planning permission CA/16/00404/OUT”

The Site is referenced within the draft Local Plan to be included within the settlement boundary of Hersden. However, crucially it is not included for any specific allocation or identified to be in any specific use within the draft Plan.

Hersden

In the revised draft Canterbury District Local Plan 2040 the site is identified within the settlement boundary of Hersden, which is recognised as a rural service centre in the settlement hierarchy in Policy SS3. Draft Policy R2 concerns Rural Service Centres and the policy makes positive provision for residential development of residential allocations, previously developed land and minor development including infilling of appropriate sites. This approach is supported, although it is questioned why infilling on appropriate sites cannot be major as well as minor development, depending on the characteristics of the site.

The subject site is located within the revised Hersden settlement boundary, where significant new development is both under construction, as well as committed through existing planning permissions and development plan allocations, as well as new draft allocations. This site has planning permission, under CA/16/00404/OUT for Hoplands Farm allowing the site for up to 250 houses, up to 5,572sqm of business floorspace and additional employment space and parish parkland. These developments around the site have transformed Hersden from a settlement that was largely to the north of Island Road to a settlement that is located either side of Island Road, with the creation of a high quality place and considerable amounts of new housing with sustainable travel options that enable residents to live highly sustainable lifestyles.

Lack of demand for Employment Land

Whilst development activity has demonstrated Hersden to be a successful and attractive location for residential development, the settlement has not proven to be appealing for new commercial premises. Despite the subject land having been granted outline planning permission for commercial development since 2017, no works have begun or are scheduled to begin due to insufficient demand for employment space. This is an issue more widely in the local area where there is a significant amount of unoccupied space and other similar commercial developments that have not come forward due to a lack of interest. The commercial floorspace has been advertised for the last five years with no meaningful interest and a board has been erected on site advertising the space. In addition, floorspace has been advertised through Locate in Kent and Caxtons, a commercial land agent.

Given this backdrop, QE considers that commercial floorspace should not be allocated at Hersden and that land with consent for commercial space which has not come forward should be able to be brought forward for residential development, in accordance with national planning policy advice set out in Paragraph 126 of the NPPF to allocate for more deliverable uses to reflect changes in demand for land.

To the east of the site is Lakesview business park, which is already well-developed and has been marketed for further expansion. However, no leads have come from this engagement and marketing exercise, given the limited market demand in this location. There is also currently office space available for let in the Lakeview Business Park, which is evidence of there not being a need for more employment space.

The draft Local Plan approach of identifying the subject land within the strategic site and within the settlement boundary is supported. QE considers that the Council should also give consideration to specifically allocating the Site for residential development. However, in the absence of a dedicated allocation, the Plan should make positive provision for surplus commercial landholdings such as the subject land to be brought forward for residential development.

Summary and Conclusion

QE supports the site being included as part of the wider strategic site and supports the amendment to the settlement boundary to incorporate the strategic site, which QE considers to be entirely logical and appropriate.

The Council should also give consideration to a specific residential allocation for the subject land, which is clearly in surplus commercial use, to be brought forward for residential development. In the absence of a specific allocation however, the Plan should support the site being brought forward as a windfall site, in accordance with Paragraph 126 of the NPPF.

We trust these comments will be taken into consideration and afforded the appropriate level of weight in the next stages of the draft Local Plan. Addressing the comments set out within these representations are necessary to ensure that the Local Plan reflects the appropriate needs of the surrounding area. We would be grateful if you could keep us informed on progress of the draft Local Plan, including any further stages of consultation.

Should you have any queries in relation to these comments, please do not hesitate to contact myself

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Yours faithfully,

Lydia Frimley
Assistant Planner

APPENDIX 2 – SITE LAYOUT



MILTON STUDIO
 Site Layout - Option 2
 Proposed Residential Development, Hoplands East, Canterbury, Kent
 Church Lane, Milton Manor Farm, Ashford Road, Canterbury CT14 1PP
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