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Sent via email

20 May 2024

Dear Local Plan Team,

REPRESENTATIONS TO THE REVISED CANTERBURY DISTRICT LOCAL PLAN (REG 18) CONSULTATION – DRAFT POLICY C17: LAND AT CANTERBURY BUSINESS PARK

Iceni Projects Limited ('Iceni') is writing on behalf of Quinn Estates (QE), who are representing Highland Court Group (HICO) in respect the revised draft Canterbury District Local Plan 2040 (Regulation 18 Consultation). This representation follows a previous submission sent in the Jan 2022 consultation.

HICO is a key employment provider in the District and has a long history of supporting business development within Canterbury.

HICO and QE commend the vision and growth ambitions of the Council set out within the Draft Local Plan, particularly with respect to balancing future employment needs. These representations relate specifically to the Land at Canterbury Business Park which is allocated under Policy C17 of the Draft Local Plan for an employment and viticulture hub.

This representation makes general support of the revised allocation Policy C17, but suggests minor amendment to the Concept Masterplan to reflect the reduced allocation, and to the policy wording to enable the flexible delivery of the expansion of the Business Park. The following documents are submitted with these representations in support of the proposed allocation:

- Revised indicative masterplan options 1 and 2;
- Highways and Transportation Note dated 9 January 2023 prepared by Connect Consultants;
- Minerals Statement dated 6 January 2023 prepared by Ecologia.

a. Relevant Background

Highland Court Group

Highland Court Group (HICO) is a family-owned business which has operated in Canterbury since 1928 and now spreads over 1,000 acres across several farms in East Kent. HICO started out as a traditional farm using traditional farming practises, but over many years of innovation it has evolved into a diverse rural business. Today the estate combines agriculture, commercial space and leisure. It is also home to the hugely successful Canterbury Business Park.

With direct access to the A2 road network, Canterbury Business Park accommodates large-scale commercial warehousing for operators including as Hutchinsons agronomists, BT and J W Brasier. Alongside Canterbury Business Park, HICO has converted redundant farm buildings and barns – such

as former cow sheds, a piggery and a buttery – to create a hub for smaller artisanal manufacturers, rural businesses and distributors such as Oak & Rope, Kent Crisps & Kentish Oils, and Bee Equipment. Creative independents such as Cherry Orchard Publishing, APX Architecture and Quinn Estates have also been attracted to these converted farm buildings, which, in turn, has driven demand for leisure offerings such as the Night Yard – an immensely successful wedding and events space.

HICO remains committed to the core principles that have made this destination such a success to date, namely co-locating larger scale rural/industrial operations benefiting from the unparalleled access to the road network alongside smaller, creative and artisanal activity that has flourished in the countryside setting.

b. Updated Evidence Base

The Council previously prepared an Economic Development and Tourism Study ('EDTS', 2020)¹ to support the earlier iteration of its Draft Local Plan and to provide a comprehensive assessment of employment and economic development needs across Canterbury District between 2020 and 2045. This evidence was supplemented by the Canterbury EDTS Focused Update Final Report, dated June 2022.

In order to inform the revised iteration of the draft Canterbury District Plan to 2040, the Council has provided a Supplementary Note dated August 2023. This note re-casts the study period used within the Canterbury EDTS Focused Update to reflect an amended plan period for the new Canterbury District Local Plan to cover the 21-year period 2020-2041. The note re-presents outputs from the two future growth scenarios considered as part of the EDTS Focused Update (Scenario 1 'labour demand' and Scenario 2 'labour supply') to cover the amended 21-year plan period from 2020 to 2041.

In effect, the amended evidence removes four years from the study period to reflect the shortened plan period of the revised draft Local Plan. The revised Reg 18 consultation 2024 is also accompanied by a Development Topic Paper dated February 2024. The EDTS Supplementary Note of Aug 2023 and Development Topic Paper of Feb 2024 therefore reflect the up-to-date evidence base upon which this representation is based.

c. Latest Employment Need

The Council's Economic Development and Tourism Study (2020)² included an assessment of Canterbury Business Park which identified the strategic importance of the site as a 'key rural employment hub' related to its role in accommodating a cluster of economic activities including the potential to provide a range of employment opportunities in this largely rural area of the District. It recognised that the business park is a highly marketable location for distribution and industrial uses, reinforced by the site's good access to the A2 primary road route. Furthermore, the Study identified scope to use the site more efficiently and the potential for future development, particularly for largescale warehousing.

The EDTS Supplementary Note 2023 provides the latest evidence regarding Canterbury's employment need. The Focussed Update draws on Experian's December 2021 economic forecast to consider short and longer-term effects of the Covid-19 pandemic upon economic growth prospects for the District over the Local Plan period and considers the updated labour demand growth and labour supply growth scenarios.

In terms of labour demand growth, the overall scale of employment growth implied by the Experian forecasts is not dissimilar to that implied by equivalent forecasts analysed as part of the original EDTS (taken from Experian's September 2019 release). This scenario generates a planning requirement for 141,100 sqm or 31 ha of employment land over the 21-year period 2020-2041, comprised as follows:

- Office E(g)(i)/(ii) - 30,780sqm
- Light Industrial E(g)(iii) - 45,160sqm
- General Industrial (B2) - 11,200sqm

¹ Economic Development and Tourism Study (2020), prepared by Lichfields.

² Economic Development and Tourism Study (2020), prepared by Lichfields.

- Storage and Distribution (B8) - 53,960sqm

In terms of labour supply growth, the evidence implies a total population increase of 26,533 between 2020 and 2041, but also project a declining working-age population in the District. This is said to act to constrain the scale of workplace labour supply that could be available to take-up local employment opportunities in future, particularly compared with the labour demand scenario. This scenario generates an employment land requirement equivalent to 60,320 sqm or 13.2 ha over the 21-year comprised as follows:

- Office E(g)(i)/(ii) – 13,145sqm
- Light Industrial E(g)(iii) – 19,245sqm
- General Industrial (B2) – 4,810sqm
- Storage and Distribution (B8) – 23,120sqm

Therefore, the EDTS Supplementary Note 2023 recommends that the Council seeks to identify additional supply of B8 floorspace that is market viable and suitably located. It also notes that there remains the risk that a number of strategic employment allocations do not come forward in full for development over the Plan period, which could place further pressure on remaining pipeline supply to accommodate the District's future economic growth needs, unless alternative capacity can be identified.

d. Viticulture and Food/Drink Sector Need

In addition to the identified need for employment floorspace across the District, the evidence base for the Draft Local Plan had identified that there is a need to support wider food and drink industries in the District. The Council's Economic Development and Tourism Study (2020) specifically promotes viticulture in its wider analysis of Canterbury's leading industries and concludes that the Canterbury District is well-placed to capitalise on that growth, stating:

“The role of Canterbury District in developing this economic ecosystem is to act as a brand which vineyards can associate with.”

The Study recognises the growing value and importance of the industry and acknowledges it will be an important asset to Canterbury, located in one of the few areas where grapes can be practically grown on a commercial basis. The Study notes that the UK's wine industry could easily be selling 40m bottles of wine by 2040 (up from 5.9m in 2017) with a retail value of £1bn or more. This could support 24,000 jobs across the country by 2040, up from 2,100 today. The Study notes that “viticulture clusters in Canterbury District and Kent more widely would need to play an important role in supporting and enabling this growth”.

The Study acknowledges that Kent is already home to a number of eminent wine producers, including Chapel Down. The study supports the growth of this industry and suggests that through its promotion it could become a ‘central pillar from which other businesses and tourism could benefit’. Furthermore, the Study notes that in the wider food and drink context, the majority of food and drink production jobs in Canterbury (85%) are within crop and animal production, hunting and related service activities, which demonstrates the importance of the agricultural industry to food and drink production at a local level.

The Study concludes that “the Council should be supportive to new proposals that come forward that can demonstrate they meet a clear market/business need, particularly with respect to growth sectors such as food and drink production that require a more rural setting (such as viticulture).”

e. Meeting Employment and Viticulture Need at Canterbury Business Park

The Development Topic Paper of Feb 2024 sets out the rationale for allocating Canterbury Business Park for B8 use and a viticulture hub. This explains that initial SLAA assessment outlined that the site was unsuitable for further employment allocation during its location in the AONB and Highland Court Conservation Area. However, the SLAA assessment process also concluded that it was not possible to meet the need for B8 uses through completions, committed supply, carried forward 2017 Local Plan

sites or through alternative allocations in the current draft Local Plan. Canterbury Business Park was the largest employment site submitted to the Call for Sites and capable of accommodating the entire shortfall of B8 needs.

The Canterbury Economic Development and Tourism Study Focused Update (2023) has identified a need for 53,960sqm of B8 floorspace for the Regulation 18 draft Local Plan to 2040 (2024). When completions, supply through granted planning permissions, carried forward 2017 Local Plan allocations and draft Local Plan allocations (excluding Canterbury Business Park) are taken into account, there still remains a significant unmet need for B8 floorspace in the district totalling 35,547sqm.

As the Topic Paper of Feb 2024 sets out, the existing business park is well established with a number of successful businesses running on site and has strong benefits associated with the delivery of B8 uses, such as its close proximity to the Strategic Road Network ('SRN'), being located adjacent to the A2. It is recognised that development of the site would cause some harm to the Kent Downs AONB landscape, however new development would be seen in the context of the existing Canterbury Business Park footprint and the site's location directly adjacent to existing business park, which would moderate the impact on the wider landscape.

The paper also acknowledges that planning permission has been granted under CA/22/02055 for the expansion of Canterbury Business Park to include 11,900sqm winery with associated parking and landscaping. This is to be occupied by Chapel Down, the UK's leading wine producer that currently operates in Tenterden, Kent. The outline element of the proposal relates to up to an additional 8,000sqm of warehousing. This is to be occupied by both Chapel Down and Defined Wine, another wine producer that already operates from existing premises at Canterbury Business Park.

As such, based on the updated Economic Development and Tourism Study (2023) the allocation at Canterbury Business Park is now proposed under the revised Draft Local Plan to 2040 to include 35,500sqm of B8 (rather than the 51,400sqm in the earlier Regulation 18 draft Local Plan (2022)). The reduction reflects the reduced plan period. And with 19,900sqm of the site already granted planning permission, the draft allocation is therefore only for a further 15,000sqm plus limited supporting uses related to the delivery of the viticulture hub.

f. Commitment to Employment Quantum

HICO and QE support the inclusion of the site within the Draft Local Plan under Policy C17 which identifies that the site is allocated for:

- "1. (a) A minimum of 35,500sqm of B8 floorspace including viticulture processing and storage; and
(b) A limited amount of supporting uses, such as commercial and business, related to the delivery of the viticulture hub".*

As set out above, Planning Application CA/22/02055 has been approved by Canterbury City Council which delivers the first phase of the Canterbury Business Park expansion for the following:

" Hybrid planning application for expansion of Canterbury Business Park comprising detailed proposal for 11,900 sqm winery with associated parking and landscaping; and outline proposal with all matters reserved except access for up to 8,000 sqm of warehousing."

This planning permission therefore provides 19,900sqm of the floorspace allocated, leaving a further 15,100sqm plus a limited amount of supporting uses for the viticulture element required for delivery in future to meet with the proposed allocation.

g. Suggested Policy Amendments

Concept Masterplan

Firstly, it is noted that Policy C17 includes a concept masterplan that appears unchanged from the initial draft Canterbury District Local Plan to 2045. That plan allocated 51,400sqm of floorspace which is now reduced to 35,500sqm to reflect the shortened plan period. It is therefore suggested that the

site allocation area can be reduced accordingly, taking into account the most sensitive areas of landscape, in order to minimise and mitigate the impact of the proposal on the AONB.

The second set of proposed changes relate to two options which are included with this representation. Planning application CA/22/02055, submitted by Gary Walters of HICO Group, involved extensive consultation between Canterbury City Council and a raft of statutory and non-statutory consultee bodies including Natural England and the Kent Downs AONB Unit. Of particular concern was views from the North Downs Way public footpath, which runs along the southern boundary of the allocation. What is apparent from the applicant's LVIA work is that the Northwestern portion of the site is already heavily screened from the North Downs Way, such that development within that part of the allocation would not have a significant impact on sensitive views from the footpath. The south-western portion however, is more readily visible from the North Downs Way given the existing screening is thinner, and given this portion can be glimpsed from the North Downs Way as it runs south on the opposite side of Coldharbour Lane.

It is noted that CA/22/02055 evolved significantly during its lifespan, with a rural employment zone initially proposed in the south-western portion subsequently removed from the scheme, such that the eventual approval focussed only on the winery and associated storage buildings in the north-western portion.

As part of this representation we include two suggested options for amendment of the Policy C17 Concept Masterplan to reflect the adapted draft allocation and reflect the sensitivity of the landscape views in particular from the North Downs Way.

Option 1 sites the winery and storage buildings in the north-western portion of the allocation, as per the planning approval in CA/22/02055. Option 1 then shows a significantly reduced rural employment hub within the south-western portion, which is contained within screening of comparable depth to the existing screening. QE submits that this area could naturally lend itself to accommodating an artisanal rural employment zone comprising the supporting uses related to the delivery of the viticulture hub alongside, referenced in the policy wording. It is envisaged that these could be accommodated by companies meeting the supply and logistics side of the viticulture industry, e.g. packaging, labelling, equipment, skills training etc; as well as smaller artisanal rural producers that have an operating synergy with such companies. The landowner has indicated that he has already received strong interest from potential occupiers. The structures in this zone could comprise buildings of limited scale and traditional vernacular. Crucially, the significantly reduced development platform on this area allows for wholesale planting of woodland along the North Downs Way (CB268), the connecting bridleway CB324 and along Coldharbour Lane, to match that of the existing 30-40m deep woodland already lining the North Downs Way further north. Elsewhere, Option 1 features reduced development coverage in the central southern area and the land portion to the north. In both instances the development has been re-orientated by 90 degrees to reduce landscape impact. Finally, the previously proposed development to the north-east of the existing Model Farm is now omitted entirely, such that existing views of the Model Farm would be maintained.

Option 2 also sites the winery and storage buildings in the north-western portion of the allocation, as per planning approval CA/22/02055; but removes any development from the south-western land portion entirely. While this option would allow for additional planting of woodland within this land parcel, it would not provide an opportunity to site the "supporting uses" envisaged in the policy alongside the viticulture hub they would support in an associated and directly accessible location. Rather, these supporting uses would need to be accommodated in other parts of the allocation. Elsewhere, Option 2 also features reduced development coverage in the central southern area and the land portion to the north. In both instances the development has been re-orientated by 90 degrees to reduce landscape impact. Finally, the previously proposed development to the north-east of the existing Model Farm is also now omitted entirely under this Option, such that existing views of the Model Farm would be maintained.

Policy Wording

Canterbury Business Park has evolved into a successful rural employment site offering an unparalleled opportunity for B8 growth at an underused junction on the SRN. Alongside, HICO have successfully turned Highland Court Farm into a thriving business hub for offering flexible work/employment space that caters to differing needs of smaller, artisanal and creative business, as well as a successful wedding venue.

HICO and QE therefore support the revised C17 draft allocation and the policy wording, but would raise concern about part 1(b) of the allocation, with respect to the linking of the supporting uses to the delivery of the viticulture hub. It is recommended that the wording of 1(b) of Policy C21 is amended to the following:

*“(b) A limited amount of supporting **or related uses**, such as commercial and business, ~~related to the delivery of the viticulture hub.~~”*

OR

*“(b) A limited amount of supporting **or related uses**, such as commercial and business related to the viticulture hub.”*

As amended, the policy would enable a slightly more flexible approach to the delivery of the site and market demand. For example, it would enable start-ups that are in their infancy and still being delivered out of people’s homes and garages (aka ‘kitchen industries’) to locate and expand on the site alongside a cluster of similar or related businesses. Crucially, it would continue to give the local authority the comfort that these additional uses would be supporting, or related to, the primary function of the site.

h. Conclusion

As the Council’s highest performing rural employment site, an expansion of Canterbury Business Park is key to the economic success of the District and puts the site at the heart of the employment strategy in the forthcoming Draft Local Plan.

The expansion of Canterbury Business Park and Highland Court Farm is welcomed by HICO and QE and they are committed to providing the minimum B8 and viticulture floor area identified in the Draft Allocation. However, HICO and QE would invite a minor amendment to the wording of part 1(b) of the policy to enable the flexible delivery of employment space to meet the current and future employment needs for the District.

We trust that the above amendment is helpful to the Council and can be accommodated in the next iteration of the Draft Local Plan.

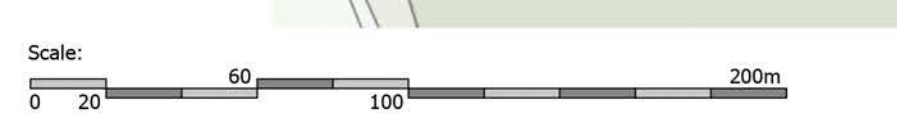
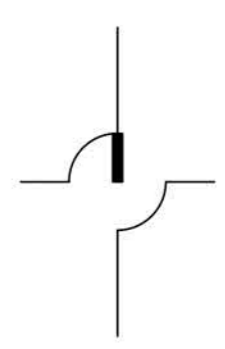
If you have any queries about these representations, please do not hesitate to contact me (email:



Yours sincerely,

James Waterhouse
DIRECTOR

APPENDIX 1 – SITE LAYOUT OPTION 1



APPENDIX 2 – SITE LAYOUT OPTION 2

