

Draft Canterbury District Local Plan : Focussed Consultation 2025 : Policy DS10 - Town Centres and Community Facilities

To: Consultations

Dear Sir or Madam,

I write to draw attention to what I consider to be a significant omission in draft Policy DS10 in the draft Local Plan and which I strongly recommend should be amended in your Regulation 19 draft Local Plan to be published early next year.

Policy DS10 – Town Centres and Community Facilities

Sub-paragraph 6 of Policy DS10 grants planning permission for the loss of a community facility where:

- a. the proposed use does not threaten the vitality and viability of the centre.
- b. the proposed use is not detrimental to residential amenity.
- c. the proposed use does not jeopardise the variety of services available in the centre to meet the needs of the local community; and
- d. the use of the premises for commercial or community use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least two years.

My concern is that this policy does not contain the sub-clause in Policy QL3b of the 2017 adopted Local Plan which supports the loss if it can be demonstrated that there is alternative provision for a similar type of use within an acceptable working distance of the facility which is proposed to be lost. This was an important requirement of the current Development Plan policy and reflects other similar policies elsewhere within local plans adopted by other local planning authorities. The absence of such a criterion would omit a very important assessment of the availability of other facilities within an acceptable walking distance. The presence of those facilities is significant for two particular reasons. Firstly, because their existence may have had an adverse impact upon the viability of another pub within an acceptable walking distance and; secondly, because it involves the necessary evaluation of whether there is any other suitable similar community facility nearby which can provide the services which will be lost as a result of the demise of the community use. Those two considerations are a vital part of the necessary assessment when considering the loss of community facilities.

I therefore recommend that Policy DS10 be amended to include similar wording to that which is contained within adopted Local Plan Policy QL3b.

Yours faithfully,