



Response to Canterbury City Council's Draft Local Plan

28 May 2024

Canterbury BID's response to the draft Local Plan is focused on the commercial vitality of the city, with a view to ensuring the policies in the Local Plan help make Canterbury a place people want to visit, study, live and do business / invest. There are many positive aspects of the Local Plan. Our response, naturally, focusses on areas of concern.

We strongly object to the reduction in the town centre boundary and would like to see more acknowledgement of the crucial role the business community plays in the vitality of the city for everyone. Enabling residential development is of course important but can't exist without the accompanying vision for the city's commercial vitality and how commercial space can be used for people.

The Local Plan does not reference the significant Levelling Up investment which is intended to draw more visitors (residents and tourists) through investment in heritage assets and surrounding spaces, commercial spaces and arrival points and connecting routes – in other words investing in the exact areas that are proposed to be withdrawn from the town centre boundary.

Reduction in the town centre boundary could unintentionally strip the city of vital services, employment opportunities and amenities, the very things new residents would require. This comes at a time when most sectors are still in a very fragile recovery period.

The commercial areas of the city need to be supported by the Local Plan and the powers and functions that Canterbury City Council has to protect and enhance these. Canterbury has been a city of pilgrimage, heritage, culture and commerce for over 850 years. The commercial areas of the city need to be not only acknowledged, but protected within the Local Plan.

Canterbury City Centre (Policies C1-C3)

Local Plan Vision (Canterbury)

The vision identifies Canterbury as a key visitor and shopping destination and expresses a desire to diversify the offer and encourage innovative businesses to invest in the city:

- through creative and cultural development
- by providing a range of commercial leisure floorspace
- by capitalising on unique heritage and academic institutions

Vibrancy, vitality and attractiveness are key words in the vision.

Public realm, blue and green infrastructure is also mentioned as ways to mitigate against climate change and help make the city a desirable place to live, work, visit and do businesses. This is all desirable.

Comments:

- We acknowledge that this draft now references the strategies that are specific to Canterbury's identity, for example the Heritage Strategy, World Heritage Site Management Plan and the Destination Management Plan. However, this excludes Levelling Up and Canterbury Tales of England (which is currently undergoing a Council procured feasibility study on three key sites in the city).
- The Local Plan references "innovative businesses" but does not reference the UKSPF-funded "Invest Canterbury" project, the new inward investment programme for the city. This needs to sit alongside the Local Plan and will identify specific sectors and demographics that Canterbury could attract. This would give the city the tools to meet the needs of both an aging population and to attract and retain young graduates.

Policies C1 & C2 – Canterbury City Centre Strategy

1. Revitalise the city centre through:

- Sensitive mixed-use regeneration
- Sustainable transport improvements
- Green infrastructure connections
- Cultural and public realm enhancements

Green infrastructure connections, and cultural and public realm enhancements are fully supported. However, given the necessity of these interventions to make the overall plan deliverable, how will they be funded? Is this plan doable?

We would like to see a more detailed vision and description of the kind of city the Local what specific sectors for "sensitive mixed-use" generation. See above regarding an Inward Investment Strategy to sit alongside the Local Plan.

2. Protect primary shopping area provision at ground floor and

3. Outside the primary shopping area, mixed use development which incorporate main town centre uses will be supported.

Primary shopping area

We support the need for the primary shopping area and the need for more "mixed use" development, specifically leisure and businesses that are based on social interaction, in addition to new, flexible and high quality office space and hotel use. Our main question is whether the policies in this plan will enable planners to approve the kind of commercial development that will enable the city to thrive.

We would also like the report to acknowledge that Canterbury is bucking the trend regarding openings versus closures. In 2023, there were 39 openings versus 27 closures, and 36% of Canterbury's businesses are retail, which is higher than 2019. Commercial interest in the city remains strong – 68% of businesses are independent and we have strong interest from national brands as well. Oliver Bonas is set to open soon and there is interest from the Ivy who currently have a licensing application pending.

Town centre boundary

We object to reducing Town Centre boundary, which would see the area within the ring-road reduced such that it only includes the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area city. At a time when the Council is investing in these areas to help enable commercial uses (tourism, Levelling Up, Canterbury Tales of England,) it does not make sense to exclude them from the town centre boundary.

This could unintentionally strip the city of vital services, employment opportunities and amenities, the very things new residents would require. This comes at a time when most sectors are still in a very fragile recovery period.

We do not doubt that we need more housing and that there will be more residential use city centre space (preferably above ground level and within specific viability zones). More residents, especially within walking distance, can support businesses. However, if this influx of new residents is at the expense of those very same businesses then we could lose the critical mass of the commercial offering that attracts people to the city in the first place, and with it, the assets that bring the services and jobs that residents need.

4. Residential and office development at first floor or above will be considered “where this would be consistent with the surrounding character and street scene”.

There is too much emphasis on increasing and protecting residential over and above the vibrant commercial uses that attract people to live and spend time in and around the city, as per comments in point 3 above. The two don't need to be mutually exclusive but must be considered very carefully so that the infrastructure (waste management, lighting, transport / deliveries, for example) and the movement of people and their safety (residents, staff, customers/clients) can be well managed to create a thriving city centre for everyone .

A common refrain throughout the Canterbury City Centre section is “no unacceptable impact on residential amenity”. We acknowledge that more residential is needed, and in the right areas very desirable. However, residential cannot be the primary driver of the city's future development. A vibrant commercial offer will attract people and investment and we would like to see considerations for *no unacceptable impact on commercial viability as well*.

To improve footfall and economic vitality generally, a variety of housing offer is required alongside an attractive and compelling retail, cultural and leisure offer, to attract people to

visit and stay, as well as the appropriate infrastructure to accommodate both residents and a vibrant commercial sector.

A vibrant city is not a silent city.

We recommend zoning for affordable as part of the Local Plan, as affordable housing is not likely to be viable within the majority of the town centre boundary. However, it is very much desirable and needed near the city centre. Zoning would prevent long, drawn out planning processes.

5. Local employment – best quality office accommodation will be protected and new office accommodation, flexible and co-working spaces, including start-up, will be supported.

Whilst we acknowledge that protecting quality office accommodation is part of the Canterbury City Centre strategy (Policy C1), the strategy also proposes to reduce the town centre boundary and increase residential provision in the city centre, arguably over and above commercial needs. This could have the unintended consequence of eroding local employment possibilities – exactly what this point advocates. The demand over the course of this Local Plan is not clear, and could potentially increase, albeit in a different form (for example, co-working and flexible working spaces).

6. Development of the brownfield site at 43-45 St George’s Place (former Odeon site, Policy C2) will help revitalise the city centre by providing housing in sustainable location..

We are very concerned about the use of this space for housing. It represents a significant loss of commercial space, particularly given Canterbury’s stated aim of being a “first class cultural, heritage and commercial destination” and, as stated in the draft Local Plan that “Canterbury will continue to be the primary commercial, leisure and tourism centre in the district.” The site is also in close proximity to halls of residence and evening and night time economy uses.

7. The Plan will support a diversity of use in retail and leisure, including cultural and creative and night time economy offering *“provided there is no unacceptable impact on residential amenity”*

As per point 4 above, vibrant cities aren’t silent cities. The Local Plan shouldn’t be the tool to monitor noise impact, but rather the tool that facilitates a vibrant commercial offering.

8. World Heritage Site – protect, enhance and capitalise on, including improving pedestrian and cycle connectivity and general public realm around and connecting key heritage assets.

We fully support the need to protect and enhance the World Heritage Site, including the ambitions of the Levelling Up Fund and Canterbury’s Tales of England.

We note that this draft Local Plan does not refer to the Council's investment through Levelling UK nor the Canterbury Tales of England feasibility study – both of which impact the use of land in the city.

We would also like to see the development of a Cultural Strategy for the city, following on from the Cultural Recovery Strategy. Could we have a timeline on this please?

9. All new development must incorporate active shopfronts and have well-designed storage space for refuse and recycling and adequate access for servicing.

We actively support quality shopfronts by providing the Council's Shop Front Guidelines and offering a training webinar on shopfronts using the Council's Heritage Planning team.

However, the space for refuse, recycling and servicing in a heritage city is very limited. Where will the space be for commercial and residential bins, for example, if there is literally no space? Canterbury is a conservation area with a significant number of listed buildings that could not accommodate bin storage. This requirement could potentially clash with the desire for Canterbury to be a "key visitor and shopping destination" and a first class cultural heritage destination. On a very practical level, and in particular with reference to the potential redevelopment of all the city's car parks, where exactly can the bins be placed? How can the businesses realistically be serviced? There are lessons to learn from recent commercial developments in the city.

10. Green and blue infrastructure will be protected and enhanced.

Support

11. Canterbury District Transport Strategy

Bus-led strategy is arguably needed but we quite simply don't have the infrastructure to enable people to access the city from our rural communities and towns without cars, including getting to work, reaching schools and essential services.

We also risk losing shoppers to other retail destinations. Canterbury's commercial offering is a core part of what attracts people to the city, and with it, the services and jobs that we need. A vibrant commercial offer will attract people and investment and we would like to see the city's business community better acknowledged and protected in the Local Plan and catered for in the new Transport Strategy, that, at the moment, doesn't allow for the needs of employers or employees in a predominately rural community, nor for the needs of shoppers who want to access the city.

9,400 houses being built in the district is going to have significant impact on the already fragile road network. Unless a slip road at Wincheap and park and ride for users to the North/north west of the city is implemented, the roads will be even worse, significantly reducing air quality in the city centre, with visitors staying away as they can't get to the city and businesses moving out as staff can't get into the city to work.

12. Public realm and digital infrastructure will be improved including accessibility improvements: bus station as a transport hub, roundabout improvements.

Support but need to see an improvement in the WiFi provision and analysis of the impact of this Council investment. There are still blackout areas and no information available on what difference it is making.

Policies C4 & C5 – City centre Opportunity Areas / Canterbury Urban Area

We acknowledge that we need to reduce the number of cars on the road and improve the overall transport offering, including active travel and also public transport. We also acknowledge the need for the local authority to raise funds to provide statutory services. However, we have strong concerns about the redevelopment of the car parking sites, in particular Watling Street, Pound Lane, Queningate, North Lane and Burgate Lane / Canterbury Lane. What is the aspiration for redevelopment of the car parking sites? What is the plan and timing for the sale and redevelopment of the car parking sites? What is the justification and hierarchy for developing these sites – and for what purpose? Which ones make money, what is the current and projected demand? Finally, what is the overall cost/benefit of how these sites are used?

We believe that the timing and scope for the development of these sites should wait. Other aspects of the Local Plan, for example new schools on the coast, could significantly reduce traffic and congestion around Canterbury city centre, and these interventions should be measured first before these sites, which are needed in order to maintain the commercial viability of the city, are lost.

We would like to see an acknowledgement of accessibility needs in any policy related to transport, not least with an ageing population, but also related to the needs of visitors (local and non-local).

There is also scope to consider how some of these sites (and others just outside of the city) could be used for logistics, reducing the carbon footprint and congestion related to commercial deliveries.

Tourism Development

We support the need to protect and enhance existing heritage, cultural and leisure assets, and invest in new ones, including blue and green infrastructure and enhancements, and general public realm improvement which will all increase the attractiveness of the city for those who want to live, work, study, visit and invest. We also support the need for a large conferencing hotel in the area.

Additional tourist attractions (environmental and viticultural) in the nearby area are also welcome. The latest Destination Management Plan and the new strategy for Visit Canterbury pointed to the need for more tourism attractions in the surrounding area in order to help promote overnight stays in the city.

However, there are some concerns with how these ambitions fit with other aspects of the Local Plan, in particular transport. We are very concerned that the transport policies will work against the stated desirable outcomes for tourism, and the commercial offer in the city more broadly. What the area needs alongside policies that enable active travel, is improved public transport. With most car parks earmarked for future development and all new developments in and around the area required to be “car free”, how are people going to access the city?

The economic impact of the city’s retail, education, leisure and tourism offering is hugely significant, employing large numbers and bringing in large numbers of people who spend time and money in the city – for example, the Marlowe, the Cathedral, One Pound Lane, Canterbury Brewers and Distillers, to name a few.

Employment and the Local Economy

Employment and the local economy

We are in a state of transition with hybrid working. In the short term, hybrid working is more common but that also means Canterbury benefits from people who used to commute away from the area full time, who now use the city centre more often. See Point 5 above.

Town centres and community facilities (Policy DS10)

We support the policy that stipulates that main city centre uses are to be located within the city centre to avoid detracting from the vibrancy of the city centre, which is a core part of the vision stated in the Local Plan for Canterbury. We would like to understand what criteria would need to be met in order to permit competitive commercial development out of the city centre.

Strategic Wetland Mitigation (Policy C23)

The BID fully supports the use of land for strategic wetland to offset the impact of the development on the nitrogen and phosphate levels at Stodmarsh Nature Reserve, in particular to alleviate the planning blockages in the city. But we need a solution now. What are the stumbling blocks? Could we have regular progress updates?