

Canterbury Heritage Design Forum

Canterbury Heritage Design Forum comments on the Draft Conservation Area Appraisal and Management Plan

Tim Carlyle Chair CHDF. 30 August 2022

INTRODUCTION

Canterbury Heritage Design Forum submits its responses to the CCC Consultation exercise on the Purcell proposed Draft Conservation Area Appraisal and Management Plan, to replace and revise the existing management plan.

Broadly, we welcome this document, for both its legible structure and its comprehensive scope or content. In our view it takes seriously the challenges facing the city and the quality of its heritage assets, identifies deteriorations that have occurred in terms of spatial character and building condition, and makes good concrete proposals that call for procedural and methodological change in the way that the Council manage the heritage inventory.

We set out in a separate section our detailed commentary on the various sections, but would like to set in context these comments.

The Management Plan is one element in the **CCC Heritage Strategy and Delivery Plan**, whose abbreviated contents are out on the CCC webpage on this topic, as below, with our brief comments. A very useful observation is made in the Canterbury Levelling Up Bid referred to as the Canterbury Tales LUF Bid, (whose scope actually expanded to provide separate **Canterbury Bid** and Herne Bay Bids, submitted on 12 August 2022)

Canterbury [is] a left behind destination. . .

Despite its iconic place in the history of England, the reality is that Canterbury is failing to offer a diverse and attractive experience to visitors and lags behind its peers. This is impeding the city's ability to recover fully from the pandemic. . . .

Key parts of the public realm and pedestrian environment have deteriorated in quality or are underused which has constrained growth and is damaging public pride in the city.

This echoes the gist of the Purcell comments, and the perceptions of many of our Forum members. At a recent Canterbury Forum meeting to discuss the Purcell Report, the Council Leader - Ben Fitter Harding agreed that "Canterbury has lost its way".

As above, we concur that the quality and well-being of the Canterbury Heritage portfolio has declined, but we take issue with the Council apparently writing itself out of the picture in terms of causation - ie poor management , and of failing to analyse (to date) any other reasons why the decline has occurred.

We set aside the emerging concerns at the time of writing about a general national funding emergency, but we recognise that because of this, we cannot know what funds will be available to our Council for its Strategy Programme. We do however believe that the Strategy **is capable** of producing excellent results if the analytical quality of all the elements is good, and if the overall approach is properly coordinated to take account of all these valuable inputs. We also strongly support and promote the idea that Heritage is **a key element of the well-being and identity of Canterbury**, with powerful and fundamental cultural and traditional connotations, as well as one of its unique selling points economically.

Because of this, and taking into account the increased coordination activities that we urge the Council to undertake, we strongly urge the Council to increase the capacity of its Conservation Department to manage and lead the many important initiatives that will be needed to deliver a **successful renaissance**.

Conclusion to Introduction

- We welcome the recognition of the decline of the heritage portfolio
- We regard as crucial the wording of the Local Plan that calls for the Council to **preserve and enhance** conservation areas and their special characteristics.

We call on the Council to develop new policies to procure better design quality of both development carried out on heritage assets, and any new build developments that affect the setting of assets.

- We call on the Council to develop new relationships aiming at properly coordinated design standards, with regards to
 - planning department and conservation department

- CCC / KCC highways departments and conservation department
- We call on CCC to engage in constructive debate regarding key detail design issues:
 - excessive building heights within the city walls, and immediately outside the walls
 - preservation of conservations areas quality against progressive cumulative degradation by successive individual developments of mediocre quality. For example - by removing from the St Dunstons conservation area the western 20th century housing of St Dunstan's Terrace, this exposes the older eastern terrace to harm if miscellaneous development of mediocre quality is then allowed..
- The Heritage Master Plan should be linked and integrated to an updated World Heritage Site plan, which should in itself integrate access to all parts of the site, both that within the walls, and that in the Christchurch Campus.

COMMENTS ON CCC HERITAGE STRATEGY DELIVERY PLAN

Community Conservation Area pilot project (2021 to 2023)

Comment - we are not aware of any such consultations - they would have been invaluable.

Design Review Panel (2021 to 2022)

Comment - we are not aware of any such consultations - they would have been invaluable. In our own small way, we at CHDF attempt to bring together practical architectural and urban development skills, with conservation expertise.

Heritage Guidance (2021 to 2022)

Comment - This would be invaluable, but we are not aware of any such publications to date.

We would be interested to contribute to any workshops that might feed in to them.

Canterbury Conservation Area Appraisal and Management Plan (2021 to 2023)

Comment - This has been produced as consultation draft and is generally an excellent document, on which we congratulate both Purcell, and the Council

Canterbury Tales of England [Levelling Up] Bid (2021 to 2023)

Comment - Now submitted as two Bids - Canterbury and Herne Bay, generally focussing on development of existing sites that would increase the quality of the tourist offer, and result in

funding for necessary and desirable upgrading of some major buildings - (Donjon, Westgate Towers etc). There is little that impacts on the wider heritage scene, and there is no heritage Master Plan to contextualise these fragmented proposed works, so it is impossible to judge what the overall benefits or possible harms might be.

Heritage Walking Trails (2021 to 2023)

Comment - As noted above, we support strongly the idea of a Heritage Master Plan, which this would form a key element of, and contribute strongly to visitors enjoyment and understanding of our historic assets and city.

Canterbury's Local List of Heritage Assets (2021 to 2024)

Comment - As noted above, we support strongly the idea of a Heritage Master Plan, which this would form a key element of, and contribute strongly to visitors enjoyment and understanding of our historic assets and city.

Landscape Character Appraisals (2021 to 2022)

Comment - As below, we strongly support increased awareness of the fusion of spatial and historical awareness of heritage assets in their contexts - as urban streets, parks or countryside,

Shopfront Design Quick Guide (2021 to 2022)

Comment - We support the development and evolution of the Guide, which has proved a valuable framework.

North Kent Discovery Programme (2021 to 2022)

Comment - We would support effort to develop the enhanced awareness of archaeological importance of sites in all locations, not just the key early settlements.

SECTION 2 - Specific Comments on the Draft Appraisal and Management Plan

This response and these comments are from Canterbury Heritage Design Forum (CHDF) regarding the **CCC Conservation Area Appraisal - Management Plan. Section C**

Having gone through the introduction and summary of the 21 character areas, CHDF has the following observations

- The suggestion actions are good as far they go, but what is the implementation plan and timescale?
- The very first point that occurs to us is the number of times CCC mention the impact made by inappropriate replacement of timber windows, and yet the planners persist in allowing this, although they have planning guidance that states it is to be resisted.
- Second point is the large number of small or large unsightly or out of scale buildings mentioned, but which will have been given permission by the planning department either as part of an application, or as a retrospective permission.
- Thirdly, CCC and KCC need a common approach to resolve the numerous instances cited of low-quality surface treatments allowed on highways in the conservation area - there was a particular fuss over the tarmac pavements outside the new flats at the bottom of Dover Street, but CCC/KCC just obscured the issue by blaming each other and refusing to take any action in any case. No one seems to take responsibility - how will this management plan be implemented?
- Finally, the impact of car crossovers is hinted at, but once again, KCC and CCC seem to be at complete cross purposes. What is the CCC plan for limiting crossovers, or imposing reasonable design standards? KCC will surely say they are a statutory right.

Introduction

8.2.2 street furniture mentioned - historic pattern, and surface treatments are important
- retain, maintain, repair as necessary

8.2.4 • UPVC is deplored as a replacement for timber
• incremental harm is warned against
• reinstatement of lost features - over time - is urged.

8.2.5 *CCC Shopfront Design* should be considered when new designs are created. *Why only 'considered'?*

8.2.10 Considerations for new development should have regard for the green landscape setting of the city and the importance of key views both in and out.

This does not seem to be taken into account in say New Dover Road when trees are removed wholesale from back and side areas of plots eg McCarthy and Stone - 37- 41 New Dover Rd.

8.3 SPECIFIC AREAS

- 1 Precincts
 - inappropriate street furniture, cycle racks, air conditioning units.
- 2 St Radigund's
 - screening carparks
 - street furniture, broadband cabinets
 - reverse some of the UPVC for timber window replacements [*]
- 3 St Peters - important shopping area
 - reverse poor shopfront design, and pigeon deterrent technology
 - full occupation
 - poor public area - St Mary Bredmans
 - pavements cluttered with A boards
- 4 Greyfriars / Tannery
 - Improvements to public realm generally - surface mounted equipment on buildings, pavements,
 - urban space - connect Tannery Field with rest of area
 - Greyfriars - building at risk (NB no mention here if recent chargeable visitor scheme, no interpretation.
- 5 Worthgate
 - Large carparks - better screening needed
 - vacant buildings, Castle in disrepair
 - lighting in St Mary's Park
 - lost boundary treatments, poor interpretation of eg St Mildred's
- 6 Whitefriars
 - St Georges / Iron Bar Lane carpark is poor, as are other large surface carparks
 - Public realm improvements generally, reduce / remove A boards
 - Poor surface treatments [*]
- 7 Oaten Hill
 - Large scale of existing buildings, unsympathetic materiality
 - large unscreened surface carparks
 - damaged/poor surface treatments eg Dover St
 - Vacant site - Cossington Rd
- 8 St Augustine's Abbey
 - Large scale of existing office buildings, unsympathetic materiality
 - Unscreened Longport car park
 - poor signage, poor / damaged surface treatments
 - missing porches Albert Rd
 - surface mounted equipment on buildings, pavements,
- 9 St Martins
 - Poor maintenance various buildings, unsympathetic footpath and boundary treatments
 - Reverse some of the UPVC for timber window replacements
 - Improve St Martins churchyard - is not up to the standard of a World Heritage Site element

- 10 Northgate
 - East end in particular has high proportion of unsightly buildings breaking up the street grain.[*]
 - Unsightly prominent carpark
 - Poor maintenance
 - Unsympathetic modern additions, surface equipment etc, [*]
- 11 West Station
 - S W edge Roper Rd - poor design industrial area
 - Over-scaled buildings: Station Road West / Kirby's Lane, poor detail
 - General poor detailing on surface equipment, surface treatments etc
 - The important Goods Shed building surrounds are poor
- 12 St Stephens
 - The Green impacted by invasive traffic, low quality edge buildings and street furniture.
 - Boundary treatments to the church
 - reverse some of the UPVC for timber window replacements [*]
- 13 St Dunstan's
 - Important retail area - some degraded shopfront design.
 - Some vacant shops, antisocial behaviour.
 - Windows etc requiring repair
 - reverse some of the UPVC for timber window replacements [*]
 - Improve surface treatments, remove unsightly surface equipment
 - Do not remove the west side of the terrace (20th C semi's) from the area - by controlling their development the much more important East side can be protected.
- 14 London Road
 - Wide range of minor degradations - surface equipment, commercial signage, surface treatments, missing or poor boundary treatment and front gardens
- 15 Whitstable Road
 - Church yard - is an important public space but degraded by unsightly public conveniences, street furniture clutter, uneven maintenance of graves,
 - reverse some of the UPVC for timber window replacements [*]
- 16 Wincheap
 - High proportion of unsightly buildings breaking up the street grain.[*]
 - At S W end of Wincheap, reverse some of the UPVC for timber window replacements
- [*]
 - Several historic buildings elevations in poor repair
 - Improve surface treatments, remove unsightly surface equipment
 - Impact of vacant buildings.
- 17 Martyrs Field
 - Unsightly industrial units and surface parking in Gordon Rd
 - Poor quality of buildings and treatments facing well used footpath (HopWay) -
 - General repair maintenance to surfaces. historic buildings,
 - reverse some of the UPVC for timber window replacements [*]
- 18 Nunnery Fields

- Plymouth Brethren building at top of Nunnery Rd - large gap on street scene.
 - Reverse some of the UPVC for timber window replacements [*]
 - Improve boundary treatments/ surface treatments, and surface equipment.
- 19 Ethelbert Road
- Some poor boundary treatments, and surface treatments of road/footpaths.
- 20 K & C Hospital
- Widespread distribution of temporary and low cost buildings through the site, but particularly along the original entrance drive.
 - maintain original window styles (W20 metalwork)
- 21 Old Dover Road
- On pavement carparking is unsightly
 - General street repair - surfaces and boundary treatments, poor quality major footpath (Abbots Barton Walk)
 - reverse some of the UPVC for timber window replacements [*]
- 22 New Dover Road
- Derelict property - 68 New Dover Rd - awaiting determination
 - Unsightly garage block off St Augustine's Rd
 - General issues of street surface treatments, and some boundaries.
 - Neglected public footpath (Abbots Barton Walk)

CCC Conservation Area Management Plan Review contd

Part A & E comments (Recommendations)

World Heritage Site

- Nothing by way of an integrated approach to improving the WHS management crossing half a dozen conservation areas, and commenting on the importance of it.

General issue - multiple breaches or departures from good practice in built work.

(as previous notes - these are serious issues)

The Plan makes no suggestions about how to redress:

(a) past or built work

(b) planners departing from good practice

(c) how to come up with clearer and stronger guidelines to prevent this in future.

What scope in HE guidance/law is there for Canterbury Council to adopt legally defensible stronger guidelines that are targeting enhancement of heritage assets/ conservation areas.

Coordination with Highways

Many of the issues listed by the Plan in their comments on Character Areas are to do with highways land - poor finishes, details etc.

How can CCC get control of KCC's standards to prevent this in future.

Building Heights

CHDF is very concerned about heights of new building in areas surrounding the Cathedral, within the walls, immediately outside the city wall (Pin Hill etc). or in protected view cones towards WHS buildings.

The Review seems to have no specific comments on how high buildings could affect views. This is surely a great failing.

We call on CCC to develop a meaningful heights policy limiting new building heights, making it a special case needing particular justification for new buildings within or near the walls etc to be five or more storeys.

CHDF think this is something that is implicitly accepted is an important aspect to the city as in the Recommendations we read:

01 That the historic environment of Canterbury, in particular that which contributes to the character and appearance of the conservation area, is maintained to ensure the city remains a thriving economic centre and tourist destination.

06 That views of city-wide and local importance both from within and from the setting of the conservation area, in particular those of Bell Harry Tower, are preserved.

10 That buildings, features, spaces, uses and views identified as making a positive contribution to the conservation area are preserved or enhanced.

Regarding specific impacts buildings (or trees) may have on views see Section A, para 4.6.3 (p70) dealing with important views into the city, with particular emphasis on Bell Harry Tower

View 2 - Neals Place (long views from high ground starting in rural area) includes comment

The middle ground is a mixture of trees and suburban development. Development in the middle ground would be feasible if. it was carefully considered and allowed the continued appreciation of the existing view.

View 3 - St Thomas Hill (from the urban space of the hill) concludes:

This position provides an extensive view of city, which is framed by several large mature trees between which the cathedral and roofscape of the city is seen.

The trees should be managed to avoid the complete blocking of this view, at time of writing the trees are overgrown and the view of the cathedral is not as clear as it should be.

Development proposals should preserve or enhance the roofscape of the city and ensure that the cathedral remains pre-eminent.

View 4 University Rd
includes comment

The trees in the middle ground on the university slopes should be managed so that they do not block the view of the cathedral or too much of its city setting. The valley slopes and ridgeline provide the background to the view with Bell Harry Tower breaking the skyline and dominating the roofscape.

View 7 Howe Barracks

Howe Barracks closed in 2015 and the site is to be converted into a new housing development with a new public park. The position of the barracks on the southeastern slopes of the city allows for excellent views across the city with the Cathedral at its centre. The new park will take advantage of these views and will allow them to be opened up to the public for the first time to appreciate and enjoy.

View 8 - St Martins Churchyard (upper terrace)
concludes

The relationship of the Bell Harry Tower to this background is very important and is part of the character of the world heritage site, it is also important as the backdrop of the city, contributing to the special interest of the conservation area. Developments that would interfere with this background should be resisted.

View 9 St Martins Hill
contains

At points in the open space the trees can obscure the view and the trees should be managed to retain the view of the cathedral and of the roofscape to the west. Taller buildings or those constructed of bright materials would compete with the view of the Cathedral and should be resisted.