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RBX/1031/ K711772/GSM

PLANNING POLICY Canterbury City Council Military Road Canterbury Kent CT1 1YW

Correspondence by email: policy@canterbury.gov.uk

Dear Sir/ Madam,

3 JUNE 2024

CANTERBURY CITY COUNCIL (REGULATION 18) LOCAL PLAN CONSULTATION GOLDEN HILLS FARM, BUSHY HILL ROAD, WESTBERE, CANTERBURY, CT2 0HE

Rubix Estates Ltd has been instructed by the landowners to prepare and submit a representation as part of the Canterbury City Council Regulation 18 Local Plan Consultation. For clarity the land is registered under Title Number K711772 and measures approximately 4.69 hectares.

A Red Line Plan and Title Documents are provided as part of this representation.

CANTERBURY CITY COUNCIL LOCAL PLAN 2040

The Canterbury District Local Plan (CDLP) was formally adopted in July 2017 and sets out the spatial strategy and vision for the district for the period between 2011 and 2031.

The Council is in the process of developing a new Local Plan to run up to 2040, with early engagement commencing in 2020 through a public consultation focussing on the issues facing the district. The Council is requesting responses on the draft Local Plan, which now has a reduced plan period to 2040. The implications of this change are explored further on.

The Local Plan at this Regulation 18 Draft stage identifies a lesser vision for the district in promoting aspirations for residential growth (albeit contracted since the first iteration of the draft Local Plan). It provides the planning framework to support a strong and resilient economy, improved connectivity, healthy communities and a thriving natural environment.

As set out in the National Planning Policy Framework (NPPF) (2024), strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance (paragraph 61). The Council is seeking to deliver its standard methodology housing need figure in full over the plan period.



We consider that this is the minimum the Council should be planning to meet, and we note that several proposed changes have been made to the Council's spatial strategy since the previous consultation (e.g. reducing the plan period from 2044/45 to 2040/41 with the consequential reduction in planned new housing).

Draft Policy SS3 sets out a revised plan-period starting in 2020/21 and ending in 2040/41 (totalling 21-years). This compares to a 25-year plan period proposed in the October 2022 Reg.18 draft plan.

These changes which represent a reduction in ambition is disappointing as several social & economic benefits associated with the previous level of planned new housing will now not be realised. In addition no contingency has been allowed for as several allocations are large scale strategic developments which may encounter deliverability issues and delays.

SITE LOCATION

The land is being put forward for as an extension to Policy R5 - Bread and Cheese Field which is allocated for 150 new homes. This land will be brought forward for an attractive, well-designed and sustainable housing scheme which will ensure all on-site open space and biodiversity improvements will be accessible for the new and existing community of Westbere.

As per the adjacent site, the land in question responds well to the wider District housing need. The site can provide a safe access onto the highway network through Policy R5 - Bread and Cheese Field. The Site falls within Flood Zone 1, an area of low probability flood risk. The Site is not considered to be at risk of surface water flooding, per published environment agency mapping data.

In due course, we will present and promote an exemplary scheme that garners local support from existing residents and businesses. A high-quality scheme that boasts attractive design and community benefits will be at the heart of our design for the land. Overall, a high-quality scheme will be produced, providing traditional dwellings with local materials to reflect local character. A scheme will be devised which promotes a range and choice of family housing. The layout will be designed with the houses set within generous plot sizes with ample space for new tree and shrub plantings.

Residential development on this site will support existing services within Westbere. As mentioned earlier, there is scope for landscaping and biodiversity enhancements on site which will add to the quality and character of the area.

Early engagement with the community, ward councillors, and other key stakeholders is vital to our strategy. We understand how local communities can feel threatened by housing development forced upon them. We will work hard to actively and meaningfully engage with the community to make them part of the process.

We look forward to onward participation with Canterbury City Council and preparing the new Local Plan and towards the progression of our promotion of this land.

Yours faithfully,



Gurdev S. Moore Director

