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Dear Sir/Madam,

REPRESENTATION TO THE REVISED DRAFT CANTERBURY DISTRICT LOCAL PLAN (REG 18) IN RESPECT OF SLAA159 – STRATEGIC WETLAND OPPORTUNITY

Quinn Estates (QE), welcomes the opportunity to submit representations to the revised draft Canterbury District Local Plan 2040 (Regulation 18 Consultation). This representation follows a previous submission sent in the October 2022 consultation.

Land at Milton Manor Farm presents a unique opportunity to deliver a new strategic Nutrient Neutrality wetland within the Stour Catchment and within the Canterbury District. Significantly, this proposal could facilitate the delivery of in excess of 850 new homes (based on post 2030 TAL levels) across the district through the creation of nutrient neutrality credits. The wetland could therefore make a considerable contribution to unlocking Canterbury's housing needs at a time when very limited new housing is able to come forward as a result of Natural England's moratorium on residential development dating back to 2020.

Land at Milton Manor Farm has been previously assessed in the SLAA process for around 20 self-build residential plots, under SLAA159. That proposed allocation, which covered a significantly larger portion of land than that now proposed, was listed as an omitted site in the Addendum to the SLAA Assessment 2023. The reason given for omission was that the site was considered unsuitable due to landscape and heritage concerns.

Since then, QE has been working with the landowner to look at alternative uses for a reduced portion of the site which comprises predominantly brownfield/previously developed land that currently accommodates a concrete batching plant and the wider minerals extraction site. The plant was initially earmarked for policy protection in the earlier iteration of the draft Local Plan, but is now scheduled for closure and relocation to a site at Canterbury Business Park, following grant of planning permission CA/22/02102.

Site characteristics

With the site adjacent to the Chartham Wastewater Treatment Works (WwTW) and in close proximity to the River Stour, QE has looked closely at the possibility of delivering a nutrient-removing wetland at this unique location. Working closely with specialist wetland design engineers, the attached technical documents demonstrates that the site can accommodate a 1ha wetland capable of removing sufficient nutrients to unlock around 875 new homes in the district.

Revised proposal

It is therefore proposed that a reduced portion of the land initially submitted under SLAA159 is allocated for the strategic wetland, plus 5 self-build residential plots in order to provide the upfront income needed to fund the delivery of the wetland. The reduced portion of SLAA159 comprises the previously-developed area of Milton Manor Farm that currently accommodates a concrete batching plant and is of an appropriate scale to complement the existing rural buildings on site.

With the batching plant scheduled for relocation to another part of the district, it is considered that this land lends itself to sensitive and effective re-use. The attached plans show that the majority of the allocation now proposed would comprise the strategic wetland, which would provide betterment over the current use in terms of landscape impact, and would provide significant benefit to the district in terms of unlocking housing delivery.

The lesser element comprises 5 generously landscaped self-build plots in order to fund the wetland. These would be designed using a traditional materials palette and design code, such that they would sit comfortably in the surroundings. As the accompanying plans show, they can be arranged such that a significant buffer is retained around the heritage asset.

Track record in wetland creation

Quinn Estates have significant experience in the delivery of Nutrient Neutrality solutions, having been granted planning permission and the required permits for the Conningbrook Wetland in the Ashford District that has now completed construction and is operational. This wetland has unlocked over 725 homes on the nearby strategic allocation S2, with further capacity for Nitrate credits within the Stour Catchment. Quinn Estates has also been granted permission for a wetland in Sellindge at their Grove Park scheme, which is currently under construction; and they have worked with strategic development partners to unlock over 3500 homes in Broadland, Norwich through an innovative combination of mitigation measures that includes the delivery of a RPS260 compliant wetland and on site WWTW.

This Call for Sites submission should be considered alongside the supporting evidence including a proposed wetland layout, together with the proposed allocation of 5 self-build plots alongside to fund the wetland. Examples of wetlands are also included appended to this letter from Conningbrook, also in Ashford, and Norfolk to demonstrate Quinn Estates' track record. The scale of wetland, together with the funding through self build plots means the wetland would be able to come forward at pace, and be delivered and operational in 2025.

General Spatial Strategy

Canterbury City Council's proposed spatial policy applies a blanket approach that treats all settlements below local service centres as lying within the countryside, with

new housing supported only in very limited circumstances. Quinn Estates has submitted a separate response commenting on Canterbury City Council's proposed spatial policy, and, in summary, would question the proposed treatment of lower order settlements, which has potential to be excessively rigid. This approach seems at odds with the draft plan's acknowledgement the role that smaller settlements can play in supporting larger settlements.

The sites subject of this representation are within close proximity of the urban area of Canterbury, and in close proximity to significantly larger sites being allocated for housing. They are also directly adjoining an existing business site and therefore do not form an isolated location in the countryside.

Self/Custom Build Provision

Aside from the general district-wide benefit of unlocking around 875 new homes through nutrient removal, this allocation would also provide 5 self-build homes. Local authorities have a legal duty to deliver a sufficient number of self/custom build plots in order to meet identified need.

Quinn Estates has submitted a separate response commenting on Canterbury City Council's proposed spatial policy. In summary, the draft local plan limits its allocation of self/custom build housing to the larger strategic sites. In other words, the draft local plan directs the District's self/custom housing provision to the larger housing sites of 300 or more new build homes. QE would submit that this approach is flawed and would question the demand for self-build plots available within larger housing developments. Such policy approaches taken elsewhere – in particular in Folkestone and Hythe and Ashford have failed to deliver the self build homes required and envisaged. In QE's experience, the majority of self/custom builder by their very nature tend to favour smaller bespoke developments. Therefore, while the need for self-build plots across the district is high, it is questioned whether providing for that need within larger housing schemes can be effective. Where lack of demand for self-builds is proven, the draft plan allows for reversion to market housing. Therefore, an over-reliance (or sole reliance) on self-build delivery through housing schemes of 300 units or more could be self-defeating as these would revert to market homes.

Quinn Estates (incorporating Quinn Homes) is the leading developer of self/custom build housing in Kent and has a proven track record of delivering both large-scale housing sites and smaller-scale sites at smaller settlements where a more bespoke stand-alone self/custom build product is appropriate and for which demand is extremely high. The company represents a number of landholdings where self and custom build housing can realistically be delivered to meet the needs of self and custom builders. QE submits that it is critical Canterbury City Council recognises the need to meet demand for self/custom build housing not just within larger new-build housing schemes, but also within smaller projects at smaller settlements. Milton Manor Farm is ideally suited to development of this nature. It is sustainably located with excellent links to day-to-day facilities, yet retains the charm and attraction of a rural settlement that is popular with self-builders.

Conclusion

Quinn Estates has worked closely with specialist engineers to devise a strategic wetland capable of unlocking around 875 new homes across the district, quickly unlocking stalled sites in the district that are crucial to the Council's housing, economic and regeneration strategy. The wetland is proposed in place of the existing concrete batching plant, resulting in landscape impact betterment as well as the significant benefits of new homes delivery. The wetland would take up the

majority of the allocation, which is restricted to the previously developed part of the Milton Manor Farm complex.

The significant upfront delivery costs of the wetland are proposed to be funded through allocation alongside of 5 sensitively-located, self-build plots, which would contribute towards meeting self-build need in the district. These, together with the wetland, would have less impact on the landscape and on the heritage asset than the current use.

It is therefore submitted that the site should be allocated for the uses now proposed.