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Dear Sir/Madam,

REPRESENTATION TO THE REVISED DRAFT CANTERBURY DISTRICT LOCAL PLAN REGULATION 18 CONSULTATION IN RESPECT OF SLAA230 LAND ADJACENT TO 30 CHURCHWOOD CLOSE

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.

QE is one of the leading and most prominent developers in Canterbury, with the company having successfully delivered a considerable proportion of the District's residential and commercial development over the past decade. The company also has extensive land interests in the District for a range of high quality future development projects of differing scale and complexity. Economic, social and environmental growth and regeneration underpin all of QE's projects and the company always strives to work with local communities and the City Council to deliver transformational development that unlocks growth and inward investment into the District to forge significant societal benefits.

Quinn Estates considers the Regulation 18 Local Plan to be an impressive and strategic long-term Development Plan, which outlines an aspirational vision for the District with corresponding objectives that seek to capture and secure the societal benefits of well-planned growth. The Plan goes on to outline a detailed spatial strategy that is reflective of the Council's vision.

Quinn Estates has submitted a general representation with regards to the spatial policies proposed within the draft Canterbury District Local Plan To 2040, the principle of which the company supports. QE is also submitting a number of separate representations that are specific to individual sites that the company is promoting. This representation is made specifically in respect of SLAA230 Land adjacent to 30 Churchwood Close. All of the company's representations are made constructively to help evolve and improve the plan's policies to ensure that the Plan is effective and deliverable.

Response to SLAA Assessment July 2022 (and SLAA Addendum Dec 2023)

As part of Canterbury City Council's Call for Sites process, Quinn Estates submitted a proposal for approximately 10 serviced self/custom build plots on the site.

In its SLAA Assessment of July 2022, Canterbury City Council opted not to consider progressing the site for inclusion in its draft Local Plan in light of concerns regarding landscape and ecology impact.

In its SLAA Addendum 2023, CCC has acknowledged receiving a landscape note and comments submitted by QE, but has stated that its conclusion remains the same, namely that the site is considered unsuitable as its development would be out of character with the built form of Rough Common.

QE would urge CCC to reconsider this in-principle point, in light of its recent approval of CA/22/00555 and in light of the emerging draft Local Plan. We would also draw attention to the Planning Inspector's conclusions in APP/J2210/W/23/3323592: Dargate Road, CT5 3AH.

General Spatial Strategy

Rough Common is afforded Local Service Centre status in the Council's latest Rural Settlement Hierarchy, which informs the draft Local Plan. This is an upgrading from the village status of the currently adopted Canterbury District Local Plan 2017, therefore recognising the sustainability credentials of the settlement. In the latest study, Rough Common sits within the Blean cluster of settlements, orbiting the rural service centre of Blean. It should be noted however that Rough Common, which is supported by a convenience store, also enjoys close proximity to Canterbury with excellent transport links and footpath connectivity to and from the city centre.

Canterbury City Council's proposed spatial policy sets out that within the identified local service centres, limited development which protects the rural character of these settlements will be supported on suitable sites. The site forms a natural extension of Church Wood Close, and the contained parcel of development being proposed would mirror existing spurs of development extending east from Rough Common Road, such as Ravenscourt Rd and Lovell Road, as well as that allocated in the current Local Plan (Land rear of 51 Rough Common Road). That site now benefits from outline planning permission for 23 houses under CA/22/00555. The permission enjoys its own nutrient neutrality solution which it is considered could be applied to the site at Churchwood Close.

Quinn Homes has previously commissioned and submitted a landscape impact technical note. In summary, this demonstrates that due to the contained and screened characteristics of the site, as well as its topography, development on the site would not impact unduly on wider views of the landscape. Indeed the site is not visible from any existing public vantage point. The site has also been subject to a Preliminary Ecological Appraisal which concludes that the site is unlikely to provide habitat to protected species and that, with appropriately sensitive ecological strategy, any impacts on ecology could be effectively mitigated such that biodiversity net gain in excess of policy requirement could potentially be achieved.

As such, the limited number of homes proposed would dovetail with the existing pattern of Rough Common, and would in any event accord with the general aims of the spatial strategy of the local plan.

Self/Custom Build Provision

Specific to this submission, however, is that the housing provision is proposed as an allocation of around 10 serviced self or custom build plots. Local authorities have a legal duty to deliver a sufficient number of such 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. 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. Land at 30 Churchwood Close is ideally suited to development of this nature. It is sustainably located at a local service centre with excellent links to day-to-day facilities, yet retains the charm and attraction of a rural settlement that is popular with self-builders.

It should be noted that the planning inspectorate has recently ascribed significant benefit to the deliver of self-build homes in the Canterbury district in APP/J2210/W/23/3323592: Dargate Road, CT5 3AH.

Conclusion

In light of the draft spatial policies and in light of the emerging focus of self-build provision within larger strategic sites only, Canterbury Quinn Estates would invite Canterbury City Council to review the suitability of Land at 30 Churchwood Close for around self/custom build plots. QE would submit that the site is demonstrably suitable for this level and nature of residential provision and that the SLAA assessment concerns have to date been shown to be unfounded.

APPENDIX 1 – SITE LAYOUT PLAN

Quinn Estates



Larger plots could be subdivided

Access to potential SUDS area

Open area for biodiversity enhancement

Path to allow parish/ community access to woodland/ brook

Houses set along lower part of site

Schedule

12 no. x 5 bed self build houses (250sqm / 2700sq ft)
on circa 0.3 acre plots