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Dear Sir/Madam,

**REPRESENTATION TO THE REVISED CANTERBURY DISTRICT LOCAL PLAN
REGULATION 18 CONSULTATION IN RESPECT OF SLAA082 NEW PLACE
FARM, ICKHAM**

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 SLAA082 New Place Ickham. 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 6 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 heritage impacts as well as potential access issues. It was also concluded that the site is located in an area with limited access to day-to-day services. These conclusions were reiterated in the Dec 2023 addendum. QE would respond as follows in the context of the emerging local plan policies.

General Spatial Strategy

Ickham is afforded Village status in the Council's latest Rural Settlement Hierarchy, which informs the draft Local Plan. This is an upgrading from the hamlet status of the currently adopted Canterbury District Local Plan 2017. In the latest study, Ickham sits within the Littlebourne cluster, orbiting the rural service centre of Littlebourne. Villages feature at least one service which can be either a key service or other service. In the case of Ickham, the village features a pub/restaurant, church and recreation ground. Crucially however, it lies with easy walking distance of Littlebourne, Wingham and Wickhambreaux, settlements which between them offer a range of primary schools, shops, pubs and restaurants directly accessed by public footpaths.

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 the rural service centres. This is especially relevant of the Littlebourne cluster, with orbiting villages of Ickham and Wickhambreaux within easy walking distance of the rural service centre. If opportunities to address local housing needs and to provide much-needed social infrastructure in rural communities are unduly stifled by planning policy, there is a real risk over such a lengthy plan period that smaller settlements in the District could sink into decline as development is focused only on local service centres and the larger settlements.

In light of this, Quinn Estates would advise that there remains a need to provide the emerging local plan with the flexibility to allow villages the capacity for modest growth. This needs to be done through greater flexibility in the development management policies which will be applied to windfall planning applications, but also to the approach to housing allocations in the plan.

Self/Custom Build Provision

Specific to this submission, however, is that the housing provision is proposed as an allocation of around 6 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 New Place Farm is ideally suited to development of this nature. It is sustainably located at a village with excellent links to day-to-day facilities, yet retains the charm and attraction of a rural settlement that is popular with self-builders.

Proposal

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 New Place Farm for around 6 self/custom build plots. The site is demonstrably located within walking distance of a range of services. It has the advantage of lying within a larger landholding which provided opportunity for direct connectivity to the wider public footpath system. QE would submit that the site is demonstrably sustainable and suitable for this level and nature of residential provision and that the SLAA assessment concerns have to date been shown to be unfounded.