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13 May 2024

Dear Sir/Madam,

REPRESENTATION TO THE REVISED DRAFT CANTERBURY DISTRICT LOCAL PLAN REGULATION 18 CONSULTATION IN RESPECT OF SLAA117 LAND ADJACENT TO HOWLETTS

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 SLAA117 Land adjacent to Howletts. 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 20 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 impact and potential loss of parking associated with Howletts animal sanctuary. The assessment concluded that the site would be located in an area with limited access to day-to-day services.

In its SLAA Addendum 2023, CCC has acknowledged that following review of a landscape note and comments submitted by QE, its concerns around landscape and parking have been removed from the site conclusion. Notwithstanding this, CCC concludes that the site remains unsuitable due to being isolated from day to day services and public transport.

QE would urge CCC to reconsider this in-principle point, in light of the emerging housing allocation directly alongside, which could easily provide access to this site.

THE LOCATION

General Spatial Strategy

Howletts is located to the west of Littlebourne. Littlebourne is afforded Rural Service Centre status in the Council's latest Rural Settlement Hierarchy, which informs the draft Local Plan. This is an upgrading from the local centre status of the currently adopted Canterbury District Local Plan 2017, therefore recognising the sustainability credentials of the settlement. Littlebourne offers a variety of day-to-day services including a convenience store, pub/restaurant, primary school and village hall. It enjoys close proximity to Canterbury with excellent transport links and connectivity to and from the city centre.

Canterbury City Council's proposed spatial policy sets out that within the identified Rural Service Centres, new development will be supported on suitable sites which protects the rural character of these settlements will be supported on suitable sites.

The site alongside – R15 The Hill, Littlebourne

SLAA117 Land adjacent to Howletts sits directly alongside a significantly larger area of land to the east. Significantly, the adjacent land remains allocated in the draft local plan 2040 for an extension of the Littlebourne settlement (policy R15) comprising approximately 300 new homes. This site is to be accessed via The Hill, A257. It is also to help provide a section of an envisaged cycle link between Littlebourne and Patricbourne, as identified in CCC's current adopted transport strategy.

As such, SLAA117 sits directly adjacent to, and shares a border with, the proposed settlement boundary. It would be logical and practical for CCC to therefore reconsider the inclusion of SLAA117 as a sustainably-located addition to the settlement boundary. This would offer urban planners a number of options. SLAA117 could either be a self-contained housing scheme benefiting from existing access arrangements which serve the wildlife park, or, if adequately written in to the draft policy, it could be accessed via the site alongside which is draft allocated for 300 homes under policy R15, and would therefore also be accessed from The Hill. Planners could then consider secondary access for both sites on to Bekesbourne Lane, or retain this for emergency access to both sites only. Cycle connectivity could therefore also be continued through SLAA117.

Self/Custom Build Provision

Specific to this submission, is that the housing provision is proposed as an allocation of around 20 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.

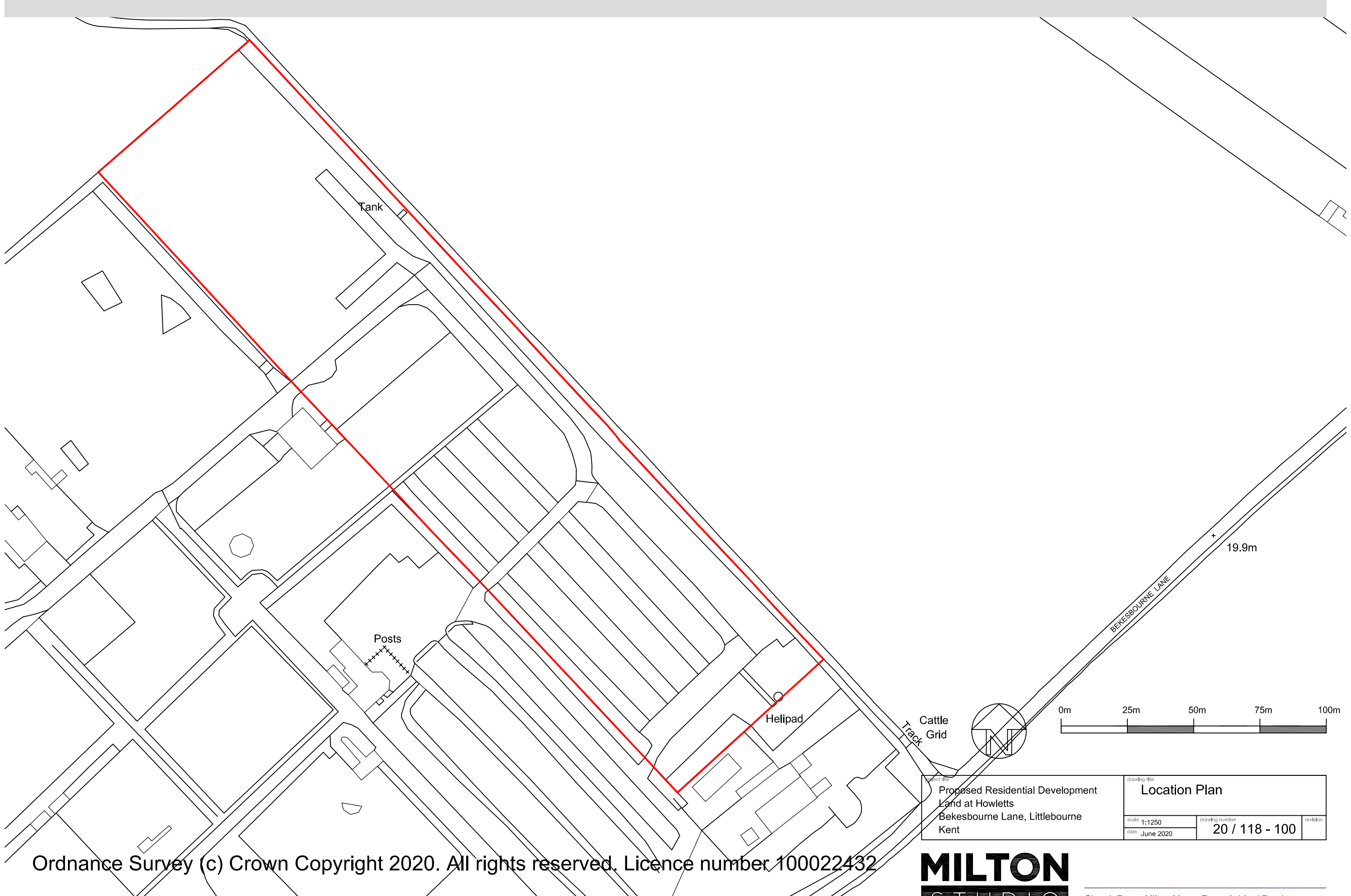
Where lack of demand for self-builds is proven, the draft plan allows for reversion to market housing. Therefore, an over-reliance (or sole reliance) on self-build delivery through housing schemes of 300 units or more could be self-defeating as these would revert to market homes.

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 adjacent to Howletts is ideally suited to development of this nature. It is sustainably located adjacent to a larger allocated housing site 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

In light of the draft spatial policies and in light of the emerging focus of self-build provision within larger strategic sites only, Quinn Estates would invite Canterbury City Council to review the suitability of Land adjacent to Howletts for around 20 sustainably-located 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 LOCATION PLAN



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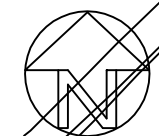
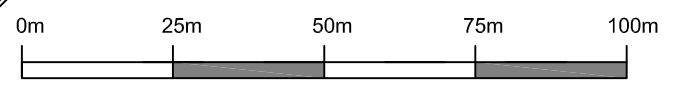
Posts

Helipad

Cattle Grid

Track

BEKESBOURNE LANE + 19.9m

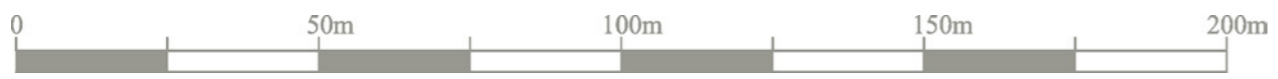


Project title		drawing title	
Proposed Residential Development Land at Howletts Bekesbourne Lane, Littlebourne Kent		Location Plan	
scale 1:1250	drawing number 20 / 118 - 100	revision	
date June 2020			

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APPENDIX 2 – SITE LAYOUT PLAN



Client 	Project Proposed Development, Land at Howletts Zoo, Bekesbourne Lane, Canterbury, Kent	Drawing Site Plan	
		Scale 1:1250 @ A3	Drawn By SJB
		Date June 2020	Drawing No. SK01

Site Plan
Proposed Development, Land at Howletts Zoo, Bekesbourne Lane, Canterbury, Kent