



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Canterbury City Council
Council Offices,
Military Rd,
Canterbury
Kent CT1 1YW

31st May 2024

Dear Sir/Madam,

**REPRESENTATION TO THE REVISED DRAFT CANTERBURY DISTRICT LOCAL PLAN
REGULATION 18 CONSULTATION IN RESPECT OF SLAA136 SWALE REACH AND SLAA140
LAND TO THE EAST OF WRAIK HILL**

Iceni Projects 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.

Iceni 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 genuinely reflective of the Council's vision.

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

In its SLAA Assessment of July 2022, Canterbury City Council opted not to consider progressing the sites for inclusion in its draft Local Plan in light of concerns regarding access and because it considered that the site would be located in an area with limited access to day-to-day services and public transport. In its SLAA Addendum 2023, CCC has reiterated this conclusion.

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. Iceni Projects 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 Whitstable.

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.

Iceni Projects would note that 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. Iceni would submit that this approach is flawed and would question the demand for self-build plots available within larger housing developments. In our 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.

Iceni 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 Swale Reach and Wraik Hill 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 location that is popular with self-builders.

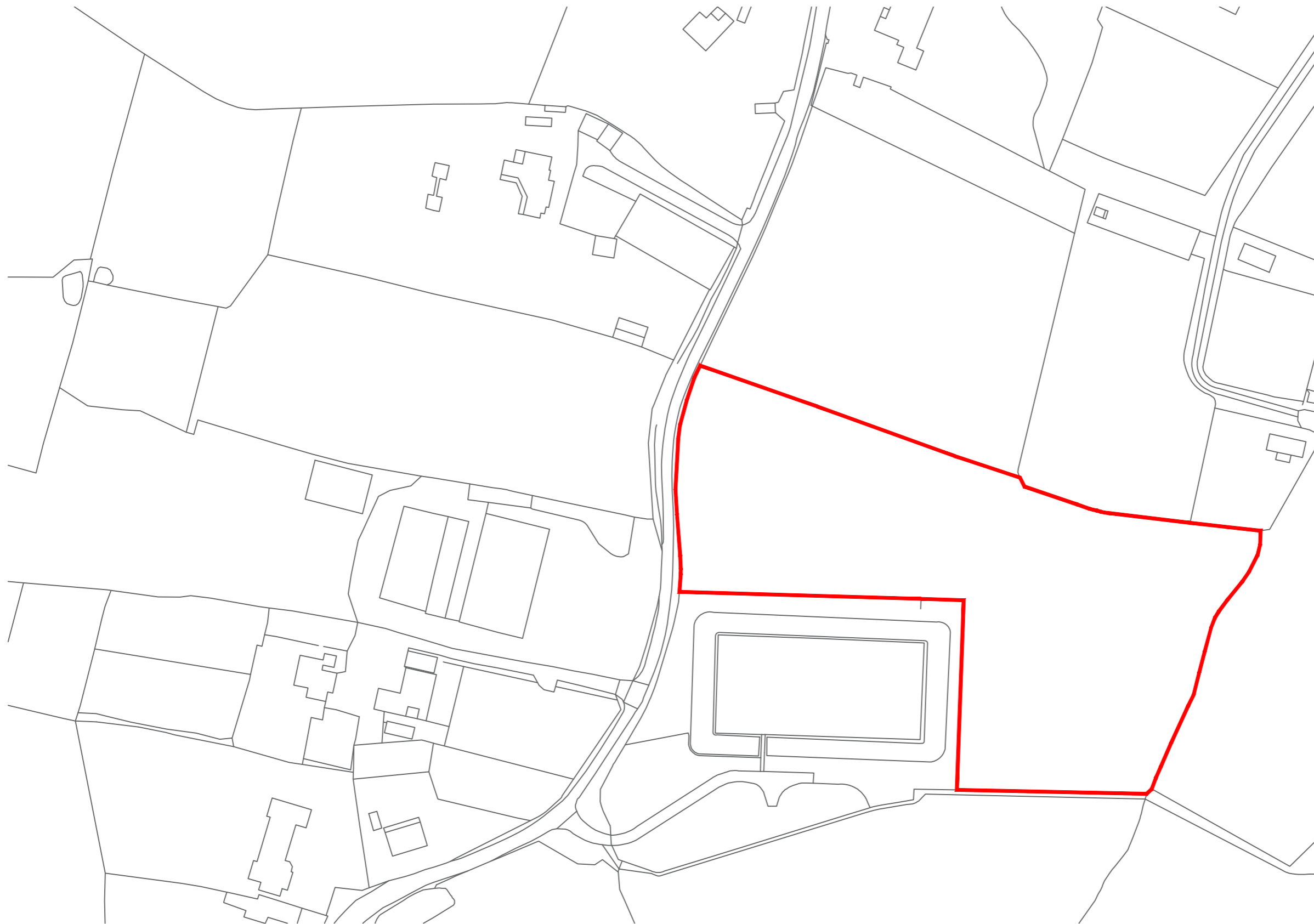
It should be noted that the planning inspectorate has recently ascribed significant benefit to the deliver of self-build homes in the Canterbury district in APP/J2210/W/23/3323592: Dargate Road, CT5 3AH.

b. Proposal

In light of the draft spatial policies and in light of the emerging focus of self-build provision within larger strategic sites only, Iceni would invite Canterbury City Council to review the suitability of Swale Reach and Land to the East of Wraik Hill each of which could comfortably accommodate approximately three self/custom-build family homes. Both sites benefit from existing access arrangements which could easily serve such a modest number of units. Iceni 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.

Yours Sincerely,

Nick Searles Pellegram
Planner



NOTES:

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Report all discrepancies, errors and omissions.

Verify all dimensions on site before commencing any work on site or preparing shop drawings.

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For all specialist work, see relevant drawings.

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Project Title

**Proposed Residential Development at Swale Reach
Wraik Hill
Whitstable
Kent**

Drawing Description

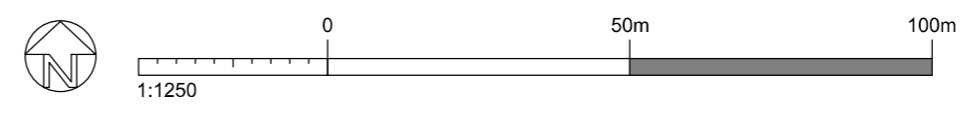
**Red Line Site Location Plan
Site 1**

| | |
|-------------|------------|
| Scale | Drawn by |
| 1:1250 @ A3 | PH |
| Date | Checked by |
| June 2020 | CSS |

CLAGUE ARCHITECTS

- 62 Burgate, Canterbury
Kent CT1 2BH 01227 762060
- 1 Kinsbourne Court, Luton Road,
Harpden, Hertfordshire AL5 3BL 01582 765102
- 8, Disney Street
London SE1 1JF 0203 597 6112

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Proposed Residential Development at Swale Reach, Wraik Hill, Whitstable, Kent

| Drawing Number | Revision |
|----------------|----------|
| 29639A_10 | B |



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Project Title

**Proposed Residential Development at
Swale Reach
Wraik Hill
Whitstable
Kent**

Drawing Description

**Red Line Site Location Plan
Site 2**

Scale

1:1250 @ A3

Date

June 2020

Drawn by

PH

Checked by

CSS

CLAGUE ARCHITECTS

62 Burgate, Canterbury
Kent CT1 2BH

01227 762060

1 Kinsbourne Court, Luton Road,
Harpden, Hertfordshire AL5 3BL

01582 765102

8, Disney Street
London SE1 1JF

0203 597 6112

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Drawing Number

29639A_11

Revision

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