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Planning and Development
Canterbury City Council
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29th May 2024

Dear Sir/Madam,

REPRESENTATIONS TO CANTERBURY CITY COUNCIL'S REG 18 CONSULTATION OF THE REVISED DRAFT LOCAL PLAN TO 2040 – GOOSE FARM, BROAD OAK

Iceni Projects, on behalf of Quinn Estates (QE), welcomes the opportunity to provide representations to Canterbury City Council's Regulation 18 Consultation of the Revised Draft Local Plan to 2040 in respect of Land at Goose Farm, Shalloak Road ('The Site'); and Land to the South of Goose Farm (the 'Additional Land').

QE supports the continued allocation of Land at Goose Farm ('The Site') within the Revised Draft Local Plan for mixed-use development under draft Policy R14. The allocation sees new housing provided alongside the existing employment provision on The Site, and would assist with meeting the District's housing and employment needs over the plan period to 2040.

But QE would also urge CCC to consider merging the adjacent 'Additional Land' to the allocation. Both The Site and the Additional Land were considered in the SLAA process under SLAA235 and SLAA221 respectively, but the SLAA evidence documents suggest there may have been a degree of confusion in the site review process, and that an obvious opportunity to improve upon the allocation risks being missed.

While the draft policy R14 allocation can function successfully in its own right within The Site (SLAA235), the merging of the Additional Land (SLAA221) provides an opportunity to improve upon the allocation, as set out below.

a. The Site (SLAA235) and the Additional Land (SLAA221)

The Site at Goose Farm (SLAA235) is a previously-developed commercial site located to the west of Broad Oak, approximately 2km to the north-east of Canterbury. The site currently comprises several light industrial units and hardstanding which accommodates a number of small businesses; however, it is not protected for this use. The site was granted planning permission for Proposed 36 no. industrial units with associated parking, turning and landscaping following demolition of all industrial buildings and structures under CA/18/00476. Essentially this consent proposed a rationalisation of the commercial site and associated parking with new purpose-built structures fit for 21st century employment occupiers.

The Additional Land (SLAA221) comprises a former orchard immediately adjacent to and south of The Site; thereby forming a logical and contained expansion of it. Crucially, the Additional Land (SLAA221) benefits from a recently completed access road approved under CA/18/01906 for the stationing of caravans for agricultural workers on an area behind the Additional Land.

b. Opportunity to merge SLAA235 and SLAA221

Canterbury's draft policy R14 allocated SLAA235 for approximately 26 dwellings alongside approximately 1,880sqm of business space. The allocation essentially keeps the current business area in situ and allows for residential development to the north, using the existing access.

However, there remains an opportunity to improve on the allocation by combining The Site (SLAA235) with the Additional Land (SLAA221). The merging of the two would allow for a marginally larger allocation size with increased housing in the SLAA235 element using the existing access, and a new commercial offering in the SLAA221 element, using the newly completed access approved under CA/18/01906.

c. Review of SLAA235 and SLAA221

Quinn Estates considers that the opportunity to merge the two sites appears have been missed in the SLAA review.

In its original SLAA Assessment of July 2022, Canterbury City Council considered The Site SLAA235 suitable for allocation, concluding that it could accommodate 26 dwellings alongside the existing commercial space and sharing the same access.

In the same assessment, CCC considered the Additional Land SLAA221, apparently for further housing, and again appears to have considered the site suitable for allocation. The assessment suggests an allocation of 26 dwellings. It is possible there has been some confusion with SLAA235.

SLAA221 is later referenced in the SLAA Addendum of July 2023, but as an omission site. The document correctly states that the Additional Land is intended for commercial use, but states that SLAA221 was assessed as a new submission under SLAA313. This appears to be an error, as SLAA313 is a separate site to the east of Goose Farm under separate land ownership. Examination of the SLAA313 assessment in the accompanying appendix shows that SLAA221 has not been considered at all.

Clearly, it would have been appropriate to assess SLAA221 as a new submission alongside SLAA235 and we would urge Canterbury City Council to review this.

d. Policy R14 – Land at Goose Farm

Quinn Estates is supportive of the allocation at The Site at Goose Farm. The Site is located in a highly sustainable area, close to Sturry train station and bus services on Herne Bay Road. These bus routes provide comprehensive access from Broad Oak to employment, schools, retail and leisure facilities in the three main settlements in the Canterbury district. Both routes also connect to Sturry railway station to the south and Herne Bay railway station to the north, allowing onward connections to Canterbury, Ashford, London and along the Kent Coast

From The Site there are several amenities within the typical walking distance of 1.6km, representing a walk of up to 20 minutes. These include Broad Oak village shop, a butcher/deli, village hall and the Golden Lion pub. Sturry Primary School is slightly further at 1.8km.

QE also supports the positive approach to growth in the District and considers that the land at Goose Farm can assist in meeting rural housing and employment floorspace needs. The need for rural employment floorspace within the District is clear. The Economic Development and Tourism Study Update (June 2022), which forms part of the evidence base for the draft Local Plan, identifies a mismatch in future provision at a sub-District level, with a relative over-supply of land to accommodate growth needs in Canterbury City and insufficient capacity to accommodate future business needs in Whitstable and rural areas of the District. The Table below shows a comparison of Employment Floorspace Supply and Demand to 2045 by Sub Area:

Sub Area	Available Employment Floorspace Supply (sqm)	Reported Level of Market Demand [‡]		Demand / Supply Balance to 2045
		Office	Industrial	
Canterbury City	64,319	Low	Low/Moderate	↑
Herne Bay	70,571	Low	Moderate/High	↔
Whitstable	3,266	Low	Moderate/High	↓
Rural areas / rest of District	8,121	Low/Moderate	Low/Moderate	↓
District Total	146,277	Low/Moderate	Moderate	↓

KEY ↔ = adequate supply ↑ = over-supply ↓ = under-supply

[‡] Based on property market analysis undertaken for the original EDTS

The evidence base supports highly suitable sites for employment such as the identified land at Goose Farm being proactively identified for development in the Plan. The approach is considered to be wholly consistent with the NPPF, which highlights in Para 85 that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach is also consistent with the requirements of Para 86 of the NPPF in proactively identifying the subject site, and Para 87 in making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. The policy allocation is also considered to be consistent with Paras 88 and 89, which promote supporting a prosperous local rural economy.

The policy allocation is also considered to be consistent with the NPPF Para 60, which states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The site is located in a sustainable location which benefits from good access to services and facilities in Sturry and central Canterbury. The site is available, suitable and achievable. There are no obvious barriers to delivery, including that there are no constraints on the site such as ecology, trees, flooding and heritage, and the site is not dependent on the delivery of infrastructure before coming forward.

In summary, QE would support the allocation of Draft Policy R14 as it is.

e. Proposed Evolution of Allocation R14

Alongside its support of draft policy R14 in its current form, QE would reiterate that there remains an opportunity to improve on the allocation by combining The Site (SLAA235) with the Additional Land (SLAA221). An important contextual change has occurred since The Site was originally submitted in the Call for Sites process, namely the recent construction of an additional access from Shalloak Road (application reference: CA//18/01906) which offers the opportunity for the commercial element to have its own access, separate from the residential.

Under the refined option, the existing R14 allocation would be developed as a solely residential scheme using the existing Goose Farm access, yielding around 43 dwellings including affordable housing. The Additional Land to the south (SLAA reference 221) would be included in the allocation – in part or in totality - and the employment use moved to this area of the site.

This option would result in a marginal increase in commercial provision, whilst also providing the opportunity for a significant landscape/ecology buffer alongside Shalloak Road to provide BNG. It could sit in line with the approved workers' caravans, but could still be heavily screened such as to preserve openness and rural setting of the street scene. This could also enable additional residential units on the Goose Farm site, and would separate the residential and employment uses. It would also allow the remaining former orchard area to be used as a wooded biodiversity area.

QE respectfully requests that these potential amendments to the allocation are considered by the Council as opportunities to refine and enhance the site, and are keen to discuss the options with the Council further throughout the Development Plan process.

f. Summary

On behalf of Quinn Estates, we thank you for the opportunity to input into the Canterbury District Local Plan Regulation 18 Consultation. As detailed above, the Land at Goose Farm is a deliverable and sustainable site and should remain allocated in the emerging Local Plan for mixed use development. Quinn Estates supports the allocation in its current form. However, should the Council consider it appropriate, QE submits that the construction of the new access from Shalloak Road offers an opportunity to refine and expand and refine the allocation.

I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. We also confirm that we would like to be involved in future stages of the plan-making process. However, should you require any further information, please do not hesitate to contact me on [REDACTED]

Yours sincerely,

Nick Pellegram
Planner