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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 SLAA087 LAND AT CHARTHAM HATCH

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 SLAA087 Land at Chartham Hatch. 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 general proposal for housing development of around 110 units adjacent to the Chartham Hatch settlement.

In its SLAA Assessment of July 2022, Canterbury City Council opted not to consider progressing the site for inclusion in its draft Local Plan. It concluded that site is located in an area with limited access to day-to-day services and public transport therefore future occupiers would be dependent upon private car to access day to day services. It also concluded that there are concerns regarding impact on the local highway network; and regarding landscape impact.

In its SLAA Addendum Dec 2023, CCC has reiterated this conclusion and opted not to progress the site for inclusion in the revised Draft Local Plan 2040. QE would respond as follows.

Chartham Hatch 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, Chartham Hatch sits within the Chartham cluster, orbiting the rural service centre of Chartham. Villages feature at least one service which can be either a key service or other service. In the case of Chartham Hatch, the village features a community hall and recreation ground.

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. 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.

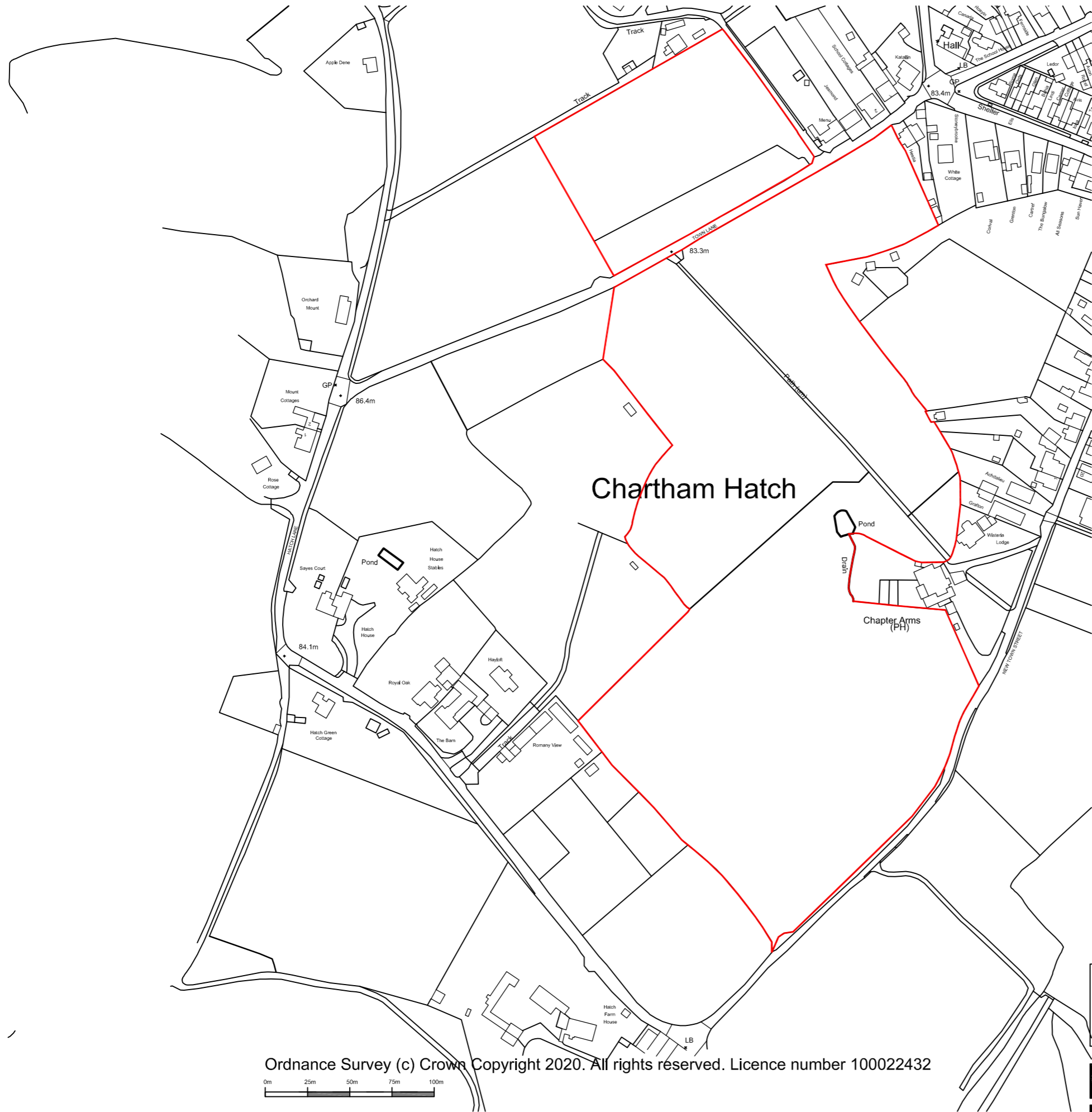
In light of this, Quinn Estates would advise that there remains a need to provide the emerging local plan with the flexibility to allow villages the capacity for modest growth. This needs to be done through greater flexibility in the development management policies which will be applied to windfall planning applications, but also to the approach to housing allocations in the plan. QE would invite the Council to revisit its assessment of SLAA0867, noting the flat topography of the site and connectivity to public footpath network, with consideration of a reduced and contained residential scheme of around 30 units. It is considered that a modest and contained expansion of the settlement could allow the village controlled and appropriate growth over the plan period and provide much needed affordable housing and homes to meet the needs of the village and its population, helping to sustain existing services and vitality that rural communities rely on.

It is essential that planning policy does not hamper opportunities to strengthen the sustainability and vitality of rural settlements as well as urban areas.

Conclusion

Quinn Estates would invite Canterbury City Council to review the suitability of the site for around 30 dwellings to support the vitality and sustainability of the existing settlement. 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



- Site Area: 8.04 Ha
- Assume 55% development area: 4.4 Ha
- Density @ 25pdh
- Units: 100-110

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project title Proposed Residential Development Land at Town Lane Chartham Hatch, Canterbury Kent		drawing title Location Plan	
scale 1:2500	drawing number 20 / 117 - 101	revision	
date June 2020			



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