



**Canterbury City Council  
Council Offices  
Military Road  
Canterbury  
KENT CT1 1YY**

The Cow Shed  
Highland Court Farm  
Bridge  
Canterbury  
Kent  
CT4 5HW

Tel: 01227 831212

[www.quinn-estates.com](http://www.quinn-estates.com)

Company Reg: 05150902

14 May 2024

**Dear Sir/Madam,**

**REPRESENTATION TO THE REVISED DRAFT CANTERBURY DISTRICT LOCAL PLAN REGULATION 18 CONSULTATION IN RESPECT OF SLAA071 LAND AT TRENLEY DRIVE**

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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 SLAA071 Land at Trenley Drive, and, specifically, that the site remains appropriate for a reduced provision of around 15 self-build plots.

## **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 serviced self/custom build plots on the sites.

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 access and because it considered 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 receipt of a proposed access diagram and indicative layout, together with representations as to why the site is suitable for modest allocation. Following its review, CCC has nonetheless concluded that the site remains unsuitable due to access concerns, and that the site would be isolated from day-to-day services and public transport. They state that KCC have confirmed the access onto Stodmarsh Road is of limited width and cannot accommodate the number of dwellings proposed; that there is no access to any footways in the local area and no safe access to the existing bus stops on Littlebourne Road. Stodmarsh Road is also not able to accommodate the proposed development being of limited width to allow two-way vehicle movements.

QE would urge CCC to reconsider these points in light of the current use of the road and access, the modest number of dwellings suggested and the evidenced accessibility of the site.

### **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. 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 larger settlements.

The site subject of this representation is within close proximity of the urban area of Canterbury, and in close proximity to significantly larger sites being allocated for housing. It also has strong connectivity to the existing PROW network, and is in close proximity to a major sports and leisure complex at Polo Farm.

It should also be noted that the site already sits within the context of neighbouring properties that form spurs of development running off Stodmarsh Road.

### **Self/Custom Build Provision**

Specific to this submission, however, is that the housing provision is proposed as an allocation of around 15 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 Trenley Drive, Stodmarsh Road 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.

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.

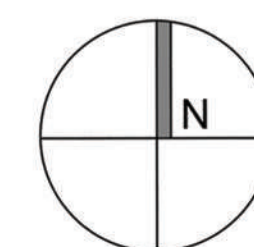
### **Access**

QE appends to this submission a technical drawing drafted by Charles & Associates highways consultants demonstrating a 4.1m access width, sufficient to serve a modest development of this size and nature.

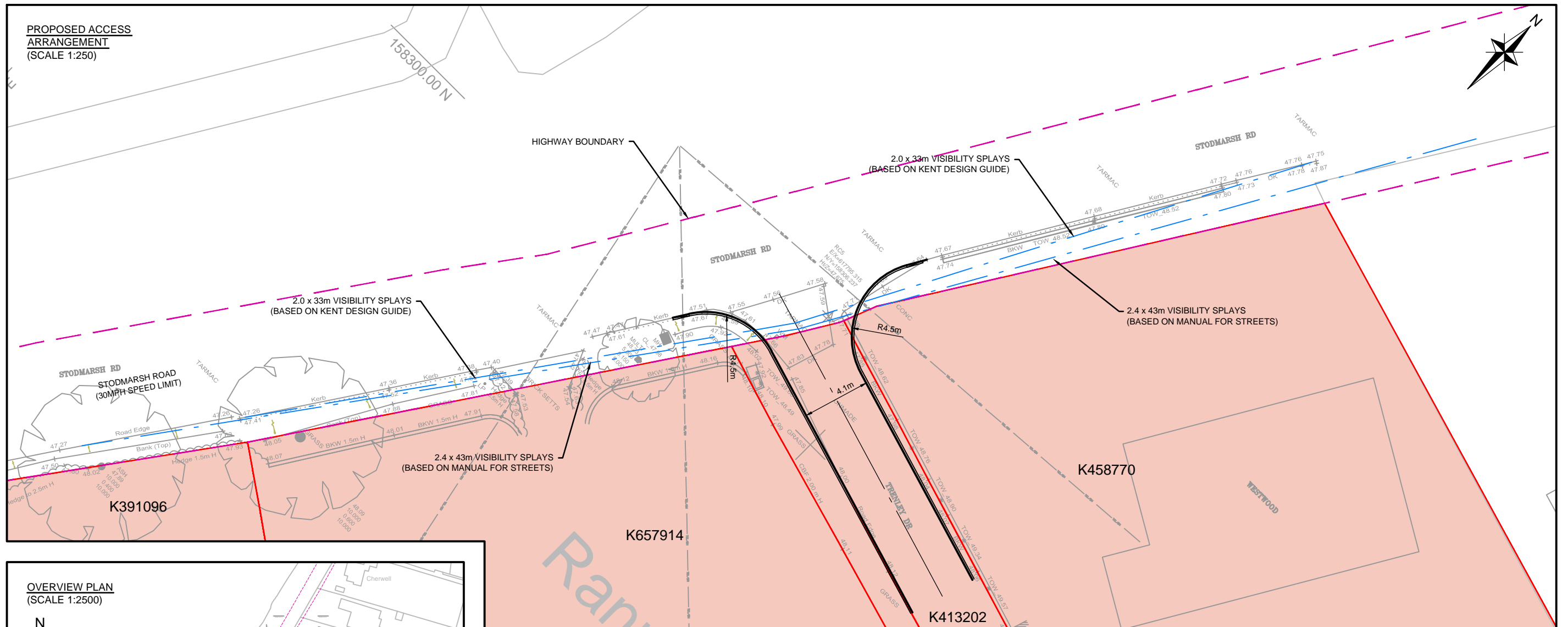
### **Conclusion**

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 at Trenley Drive benefit from existing access arrangements which could easily serve a modest number of units. 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.

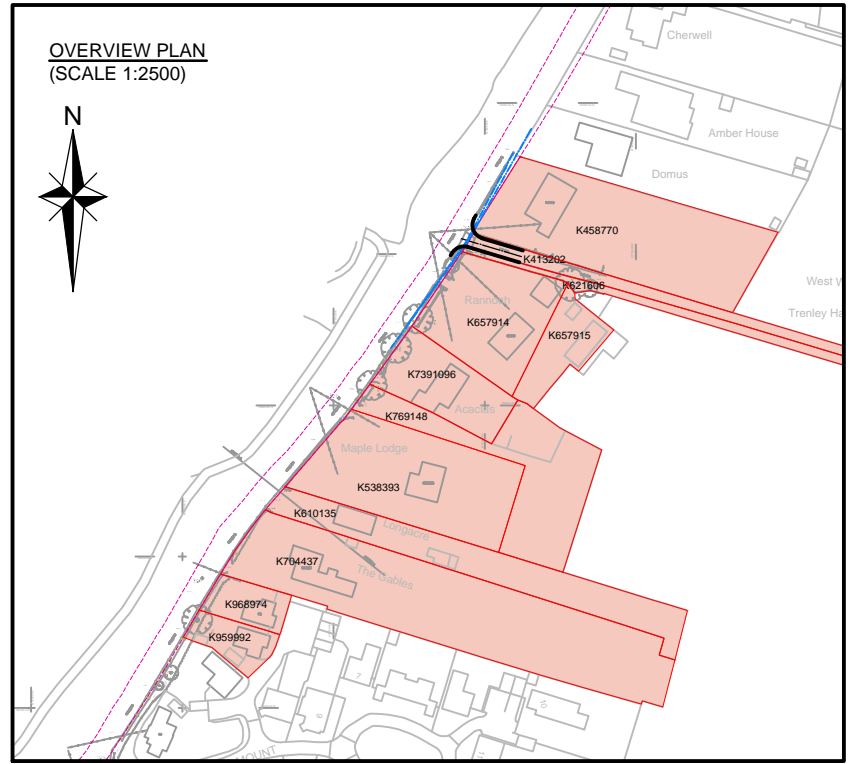
Site A - 15 Units



PROPOSED ACCESS ARRANGEMENT (SCALE 1:250)



OVERVIEW PLAN (SCALE 1:2500)



**NOTES**

1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE RELEVANT SPECIFICATION AND ALL OTHER RELATED DRAWINGS ISSUED BY THE ENGINEER.
2. DO NOT SCALE FROM THIS DRAWING. WORK FROM FIGURED DIMENSIONS ONLY.
3. ALL DIMENSIONS SHOWN ON THIS DRAWING ARE IN MILLIMETRES UNLESS OTHERWISE STATED.
4. ALL DIMENSIONS, LEVELS AND SURVEY GRID CO-ORDINATES ARE TO BE CHECKED ON SITE AND THE ENGINEER NOTIFIED IMMEDIATELY OF ANY DISCREPANCIES PRIOR TO THE COMMENCEMENT OF THE WORKS.
5. NO DEVIATION FROM THE DETAILS SHOWN ON THIS DRAWING IS PERMITTED WITHOUT PRIOR PERMISSION FROM THE ENGINEER.

B	LAND TITLES ADDED	DH	JW	JW	23.04.19
A	TOPOGRAPHICAL MAPPING ADDED	DH	JW	JW	02.04.19
-	FIRST ISSUE	RA	DH	JW	21.03.19
Rev	Amendments	Drm	Chk	App	Date

<p><b>Charles &amp; Associates</b></p> <p>Landmark House Station Road Hook Hampshire RG27 9HA 01256 630420</p> <p>Park House, Park Farm East Malling Trust Estate Bradbourne Lane Aylesford Kent ME20 6SN 01732 448120</p>	Issued by <input type="checkbox"/>	Job Title <b>STODMARSH ROAD, CANTERBURY</b>	Client <b>QUINN ESTATES</b>	Scale <b>AS SHOWN</b>	Date <b>MAR 2019</b>	Designed <b>RA</b>
	<input type="checkbox"/>	Drawing Title <b>ACCESS APPRAISAL OPTION 2</b>	Drawn <b>RA</b>	Checked <b>DH</b>	Approved <b>JW</b>	Job No <b>19-017</b>
	Job No <b>19-017</b>	Drawing No <b>19-017-002</b>	Rev <b>B</b>			