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16 January 2023

Dear Sir/Madam,

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

Quinn Estates (QE), welcomes the opportunity to submit representations to the Canterbury District Local Plan (Regulation 18 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 genuinely infrastructure-led and reflective of the Council's vision. Everybody at the Council should feel rightly proud of the draft Plan.

Quinn Estates has submitted a general representation with regards to the spatial policies proposed within the draft plan, 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 SLAA136 Swale Reach and SLAA140 Land to the east of Wraik Hill. 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

As part of Canterbury City Council's Call for Sites process, Quinn Estates submitted a proposal for approximately serviced self/custom build plots on the sites.

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.

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 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. 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 New Place Farm 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.

Proposal

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 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. 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.