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Planning and Development
Canterbury City Council
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04th January 2023

Dear Sir/Madam,

REPRESENTATIONS TO CANTERBURY CITY COUNCIL'S REGULATION 18 CONSULTATION OF THE DRAFT LOCAL PLAN TO 2045 - LAND AT DARGATE ROAD, YORKLETTS

On behalf of Dargate Developments Ltd ('Dargate Developments'), Iceni Projects welcomes the opportunity provide representations in respect to Canterbury City Council's Regulation 18 Consultation of the Draft Local Plan to 2045.

Dargate Developments Limited are disappointed that their landholding, which comprises SLAA site promotion refs. 'SLAA081' & 'SLAA246', has not received a draft allocation. As this representation demonstrates, the Site is technically suitable for development and represents an important opportunity to provide Self and Custom build housing; a specialist form of housing which is currently being underprovided in the District.

This representation specifically addresses previous concerns raised within the SLAA in respect to the Site, namely, landscape impacts, concerns of suitable access, and nearby local services. Yorkletts is a highly sustainable settlement for its size, and is a desirable location for those wishing to Build their own homes, and it is important that the Plan does neglect the District's rural housing and Self Build needs. Therefore Dargate Developments believe that the site subject of this representation should be reconsidered for allocation in the new Local Plan to 2045.

a. Site and Surroundings

As previously noted, this representation is the subject of two previous site promotions, namely 'Land at Dargate Road Yorkletts' (ref. 'SLAA246') and 'Land Lying To The South East Of Dargate Road' (ref. SLAA081).

SLAA246 comprises approximately 2.81ha of undeveloped land and is located within the north-western part of the District, within the village of Yorkletts. It comprises two land parcels of open land adjoining Dargate Road to the south. The land parcels are bordered by hedge and tree planting on all sides. The frontage onto Dargate Road is partially broken up by existing residential dwellings fronting onto this road from the south. To the north and east, the Site is bound by residential properties along Dargate Road and Combe Walk, whilst to the south and west the Site is predominantly bound by further open space, including Victory Wood.

SLAA081, directly bordering SLAA246 in the southeast, comprises 3.58 ha of Land, also located near to the Village of Yorkletts. SLAA081 comprises an irregular shape of agricultural land and a small rectangular parcel to the north which at present is accessible from small lanes in Coombe Road. A handful of residential properties neighbour the northern boundary. Coombe Wood, Ellenden Wood and Victory Wood lie to the east of the Site however do not touch the boundary. The Victory Wood open space lies to the south and is separated by a hedgerow. The land parcel benefits from a number of mature trees and hedgerows which line its perimeter.

In terms of topography, the northernmost section of the Site slopes downward to Dargate Road, whilst the remainder of the land is flat. Ellendon Wood SSSI, the Blean Woods Area of High Landscape Value and Blean Complex SAC are located approximately 180m from the eastern corner of the Site. There are no heritage assets on or close to the Site. The Site is wholly within Flood Zone 1. Additionally, the Site is not within the Stodmarsh Catchment area and would not be required to demonstrate nutrient neutrality.

b. Proposed Development Opportunity

Dargate Developments Ltd considers that the Site presents two development opportunities, either through the development of SLAA246 in combination with SLAA081, or just SLAA246, presents a viable development opportunity in Yorkletts. Whilst both options could support the Council's general and Self/Custom housebuilding needs, each would result in differing benefits and impacts. The first option is for the provision of up to 19 Self/Custom build dwellings on the Site, access to which would be granted by the Dargate Road, whereas the second option would entail a modest expansion of the village for up to 9 Self/Custom build dwellings on Site 1 (SLAA246).

Each plot will be spacious and support a sizeable garden and landscaping, in keeping with the surrounding context of the village. It is considered that vehicular access to the Site could be provided directly from Dargate Road. The existing hedge and tree planting on the Site boundaries will be enhanced further, whilst additional tree planting is also proposed on the Site.

c. Matters Raised in the Canterbury 2022 Strategic Land Availability Assessment

In July 2022, the Council published the Site Assessments which informed which sites were draft allocated in the current Regulation 18 Version of the Local Plan. The Site Assessment concluded that the Site was not technically suitable for development due to uncertainty about the potential to provide adequate access to the Site, concern regarding landscape impacts, and limited access to day to day services and public transport.

As set out in the sub-sections below, it is shown that there are appropriate solutions to the matters raised in respect to the Site. Unlike the majority of land within the District, the Site falls outside of the Stodmarsh Catchment Area and would not be required to demonstrate Nutrient Neutrality. Therefore, not only is the Site suitable, available and achievable, but it could be brought forward quickly to address short term housing need.

Landscape Impacts

In July 2022, the Council published the SLAA which included the Site and informed the draft allocations in the current version of the draft Local Plan. In respect to landscape considerations, the assessment confirmed that the Site is not within a landscape designation, nor an Area of High Landscape Value which would require landscape character to specifically be addressed in any future application.

As noted, the eastern section of the Site is located on top of a flat hill above Yorkletts, whilst the remainder slopes downwards to the west. The SLAA notes that the eastern section of the Site may therefore pose landscape considerations from wider views and produce a sporadic form of development that would be harmful to the rural landscape of the area.

It is considered that, given the amount of space available on the Site, there is a considerable opportunity to mitigate these impacts through an appropriate level of planting and suitable design measures. Furthermore, the eastern section of the Site borders development on two sides, and is also covered by a woodland in the east, which significantly limits the amount of land which the Site is visible from. The introduction of landscape buffering would also help secure important biodiversity enhancements on the Site, whilst providing a crucial buffer between the proposed development and the neighbouring woodland which would drastically improve ecological potential on the Site. It is therefore considered that there is a logical solution to the issues raised in the Site assessment in respect landscape impacts and subsequently that the mitigation measures proposed could be secured by way of a planning requirement as part of any future application.

In terms of the surrounding townscape, the SLAA assessment states that the whole of the Site falls within the village of Yorkletts and is not in proximity to any heritage constraints. The Site is well integrated into this environment due to it being adjoined to residential development on two sides, and on three sides in the northernmost section. In terms of neighbouring amenity, the Site already benefits from existing planting, however, where necessary, this planting could be enhanced further. As such, the proposal would successfully appear to form part of the wider settlement through an urban extension.

The SLAA assessment also comments on the northernmost section of the Site that fronts onto Dargate road. Unlike the remainder of the Site, this section of land is bound by development on three sides and located on a downward slope. As such, providing development on this section of land is identified in the SLAA to be a suitable infill opportunity. As such, it is considered that the Site is able to support at least a modest opportunity for development that would be appropriate to the size and existing form of the settlement. Not only would the development respect the existing character and build form of the settlement, but would also make a highly attractive addition by virtue of the scheme being Custom/Self-build, and therefore a unique addition to the village.

It is therefore considered that the Site is suitable development and could support a high-quality Self/Custom-build scheme without generating any impacts on the surrounding landscape or townscape.

Access

Another issue raised in the SLAA published in July 2022 was the uncertainty of a sufficient access to the Site. In respect to SLAA246, this issue can be wholly disregarded as the Site fronts onto Dargate Road which is wholly suitable and could accommodate appropriate visibility splays onto this road. This site has been subject of a planning application for 9 Self-Build plots (planning ref CA/22/02062). It should be noted that the proposed access was considered acceptable by Kent County Council's highways dept.

In respect to SLAA081 in the east, it is noted that this land parcel, if considered on its own, would need to rely on Coombe Road to service the proposed development. This is not considered to be a relevant issue however, as Dargate Developments Ltd own both land holdings for the land subject of this representation and the options consider relate to the development of both SLAA246 and SLAA081, or just SLAA246 on its own. Therefore, if the former option were to be allocated in the local plan, the access proposed from Dargate Road would be provided from Dargate Road which would not require significant enhancements to any existing highways.

Therefore, it is considered that the Site subject of this representation could be provided with a wholly suitable access and would not result in any transport impacts.

Limited access to Services and Facilities

In the Site Assessment, the final factor which was considered to impact the technical suitability of the Site was the number of services within sustainable reach of the Site. Whilst the Site may have less services than the District's urban areas, Yorkletts is still considered to be a highly sustainable settlement for its size.

The Site is in a sustainable location within Yorkletts, with excellent accessibility to the local strategic road network and as such to the wider south-east and London. The site is within walking distance of a filling station and convenience store which also offers a café. The Site is c.650m from the A299 which provides access to Whitstable, Herne Bay and further east, as well as the M2 and Rochester, with London beyond this to the east. Whitstable train station is located 5km to the north-east of the Site. The closest shops and services, including supermarkets and a medical centre, are located c.3km to the north-east of the Site on the edge of Whitstable. The town also provides a number of other services and facilities including shops, schools, cafes and restaurants.

In terms of local services, Yorkletts benefits from a bus stop which is c.250m walking distance to the north-east of the Site. The 638 bus service stops in Yorkletts multiple times every day, Monday to

Saturday, offering residents sustainable access to Faversham and Whitstable where there are many work opportunities and important services including trains to London. There are no dedicated cycle facilities on the nearby highway network. However, the Site is well within easy cycle distance of residential areas in western and southern Whitstable, via lightly trafficked minor highway connections, and as such, a number of important services are within a 15 minute cycling distance, including a Community Hall, GP, Nursery, Primary, School, Convenience Store, Existing employment area, Place of Worship, Post Office, Pub, Recreation Ground and Vet.

As such, for a settlement of its size, the village is one of the most sustainable settlements of its size due to its proximity to the larger settlements which significantly limits the time required to access important services using sustainable methods of transport. Moreover, there are a number of larger sites already allocated in the draft plan, namely, SLAA259, SLAA090, SLAA137b, which have almost the same level of services within proximity to the Site subject of this representation and require around the same amount of travel to access day to day services.

Due to the setting and location of Yorkletts, it is expected that there won't be as many services within immediate walking distance of the Site as there would be in the districts rural areas. This is recognised by residents who choose to live in such locations, and at present, it is considered that the allocations presented in the draft local plan fail to provide enough opportunities for those seeking to both live in a home they have designed, nor in rural areas. Despite what the draft Local Plan says, the demand for rural homes and Self/Custom build homes still exists and as such a small portion of the districts future homes will need to be delivered in the district's most sustainable rural areas so that a full range of needs can be met over the plan period.

The Site is therefore considered to be suitable for Self-build development now and that a high quality Self/Custom-build scheme could be brought forward in the early part of the plan period to address the existing demand for this housing product.

Self/Custom Build Provision

Specific to this submission, however, is that the housing provision is proposed as an allocation 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.

Policy DS2 within the draft Local Plan limits the 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. Dargate Developments consider that this approach is flawed and would question the demand for Self-build plots available within larger housing developments. Moreover, it blocks smaller, more specialist developers from providing this form of housing. The principle focus of a Self or Custom build development is to provide bespoke, exemplary homes, each of which are catered towards the aspirations of the buyer. For many people seeking to find their 'forever home', its location is a crucial factor, and without giving the opportunity for this form of development in rural locations, the plan fails to appropriately account for this need.

Therefore, whilst 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. 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 likely revert to market homes if their positioning does not align with demand. As such, Dargate Developments suggest that the next draft of the Local Plan takes account of Self and Custom Build need in rural areas, and accordingly allocates the Site subject of this representation.

d. Summary

Dargate Developments Ltd are disappointed that the Site has not been allocated in the draft Local Plan. It is advocated that the proposed development, either on the whole site, or just its northern component could support a development that would be technically suitable in terms of landscape, access, and services, and therefore represents a suitable development opportunity which is

appropriate for the Site and Yorkletts' size and location. Depending on the view of the Council, the Site could support a modest provision of Self/Custom build housing up to 19 serviced plots.

Land at Dargate Road is a deliverable and sustainable site and should be allocated in the emerging Local Plan for Self-build housing. The development of 19 serviced plots could make a significant contribution to Canterbury meeting its Self-build needs – particularly for those who have been on the Self-build register since the first base period.

I trust that these comments will be taken into account to inform the next revision of the plan, and that the value and importance of giving rural areas an appropriate share of the Districts future growth is recognised.

Yours sincerely,



Nick Pellegram
Assistant Planner