

Canterbury Draft Local Plan

Consultation Document

Response

Submitted on behalf of Hollamby Estates Ltd

January 2023

1.0 Introduction

- 1.1 This Statement forms part of the submissions on behalf of Hollamby Estates Ltd in respect of its Site at land at Molehill Road, Chestfield.
- 1.2 The Site at Molehill Road, Chestfield was submitted to the local planning authority (LPA) for its future allocation as a housing site, as part of the LPA's Call for Sites in 2020.
- 1.3 The land is some 33 hectares and is currently mostly farmland. There are no known constraints to development or designations that might affect its development. There are no other interested parties that would act as a constraint to the land coming forward for development. It is therefore a site that is both achievable and deliverable in the short to medium term
- 1.4 The Site was included as a potential housing site in the LPA's previous Consultation paper, to be connected with land at Bodkin Farm to the north, with a link road through both sites leading from the Old Thanet Way A2990 to Chestfield Road, south of the village, as it links with Molehill Road. Not only was this proposed allocation, combining the two sites, going to lead to the delivery of much needed housing and other infrastructure, but it was also going to enable a through road which would act as a 'by pass' to avoid the traffic impact of using Chestfield Road which goes through the centre of the village and its conservation area.
- 1.5 In the draft Local Plan, the LPA has decided not to allocate the Site at Molehill Road. It has allocated land at Bodkin Farm (under SS3 and W4) for a mixed use development, including 250 new homes and a school. It has allocated land at Brooklands Farm, Chestfield (under SS3 and W5) for a mixed use development with up to 1,300 new homes.

2. Response

Strategic Housing

- 2.1 The strategic housing aspirations of the Draft Local Plan seek to deliver 1,252 new dwellings per year. Canterbury has never achieved even near to this annual housing figure. In the three years between 2018 and 2021 (we currently await the 2022 figure), within Canterbury district, only 1,509 of new homes have been delivered (65% of the housing delivery target). This equates to an average of around 500 new homes per year.

- 2.2 The draft Local Plan should learn from the Council's previous and current Local Plan approaches of over-committing on meeting housing numbers and under-achieving on delivery. Rather than repeat the approach in the current Local Plan, the Draft Local Plan should be promoting a different approach. Obvious repeat mistakes include over reliance on large sites coming forward as planned, under-reliance on small sites (which can help deliver a consistent level of housing on an annual basis), and a requirement for infrastructure that leads to delay, costs and questions around delivery and timing.
- 2.3 One obvious way of trying to increase housing delivery is to allocate more land for housing than is necessary to meet the housing needs. This should assist in more housing coming forward which could help to compensate for the delay in other sites coming forward. More housing sites can also help to contribute towards the delivery of infrastructure – either directly through on site provision, or indirectly through financial contributions. One of the biggest losers in previous years has been the under-provision of affordable housing coming forward to meet local needs. The level of affordable housing proposed to be delivered on a housing or mixed use site is usually the first to be affected when the viability of sites coming forward is in doubt.

Whitstable Allocation Sites

- 2.4 This submission objects to the omission of the Land at Molehill Road as a housing allocation.
- 2.5 The allocation of land at Bodkin Farm (W8), closes the current Green Gap between Whitstable and Herne Bay, to almost a field away from the allocation of housing land on land West of Thornden Wood Road (HB4) runs westward from Greenhill.
- 2.6 The allocation of the Molehill Road Site would provide a greater Green Gap between the development and the HB4 Site.
- 2.7 The Molehill Road Site is also close to public amenities and facilities. It would adjoin the location of the new School.
- 2.8 The Brooklands Farm Site (W5) is in the open countryside, with rural lanes running alongside it. It is a significant distance from public facilities and amenities in Whitstable and Chestfield. It would lead to greater levels of car borne traffic. The impact arising from the loss of the countryside and the location of a significant level of housing and other development so far removed from existing facilities and amenities, would create a shift away from the urban areas

of Whitstable. This would run contrary to the core vision and strategies set out in the draft Local Plan.

3. Conclusion

- 3.1 It is our opinion that the local planning authority should undertake a further assessment of how it will ensure the delivery of housing at the rate it hopes. There is nothing new in the current approach that would identify a gear change towards delivery. Each Local Plan since 2006 has expressed confidence that housing delivery would be met. On the whole, and particularly more recently, it has not.
- 3.2 One way of improving the chances of delivering housing at such a higher rate is to allocate additional sites, allocate smaller sites and to better spread the costs of infrastructure.
- 3.3 This response also highlights inconsistencies in approach towards allocating Sites W5 and W8 and not allocating Land at Molehill Road. There are merits in allocating the Land at Molehill Road and also, but not solely, in connecting it to Bodkin Farm, should the extent of that allocation remain.