

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 Studd Hill, Herne Bay.
- 1.2 The Site at Studd Hill, Herne Bay 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 9.69 hectares and is currently mostly farmed land and has one owner – Hollamby Estates Developments Ltd. 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 Following the submission of this Site, the LPA asked for further detailed work to address their particular concerns over highway safety and impact upon landscape. A Traffic and Transport Appraisal and a Landscape and Visual Statement were submitted in 2021.
- 1.5 In terms of highway safety, the submitted appraisal demonstrates how the potential development opportunity of the site would be well served by a choice of sustainable transport modes, without the need for complicated diversions or adjustment to the existing infrastructure. This includes the provision of a new footway along Whitstable Road with connections to Riley Avenue and further public footpath/cyclepath routes beyond this.
- 1.6 The Landscape and Visual Statement demonstrates how the development of the site could easily be incorporated into an appropriate landscape setting, without any significant impact upon the Green Gap, between Herne Bay and Whitstable.

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.
- 2.4 It is also noted that to help the LPA make up its required housing numbers that a number of allocated housing sites are included in the draft Local Plan that have been previously identified in past Local Plans, but these have not yet come forward. These sites should be more rigorously re-assessed for their deliverability rather than re-promoted by the LPA.

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 There is no sound reasoning behind not allocating the land at Studd Hill, Whitstable Road, for housing.