
Response to draft District Vision and Options Consultation

Prepared by Barton Willmore on behalf of Devine Homes

July 2021

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APPENDIX 1 : GOLDEN HILL SITE PLAN

1.0 INTRODUCTION

- 1.1 These representations to the draft Vision and Options consultation are prepared on behalf of Devine Homes, who have an interest in the Land at Golden Hill, as identified in Appendix 1.
- 1.2 Land at Golden Hill has been promoted under site reference SLAA172 in the Strategic Housing Land Assessment 2020. As set out in Section 3, the site is a sustainable location that would provide for a logical extension to Whitstable, which in turn is a Tier 2 settlement that has a range of facilities and services within walking and cycling distance of the site.
- 1.3 The site has the opportunity to deliver sustainable residential development comprising approximately 90 affordable and market dwellings, including open space provision and landscaping in a way that would form a defensible boundary to the south of Whitstable.
- 1.4 These representations respond to the Issues raised within the consultation webpage and are overall supportive of the approach that Canterbury City Council has taken to its preferred approach growth strategy and policies.

2.0 RESPONSE TO CONSULTATION THEMES

2.1 This section provides our response to the consultation themes set out within the draft vision and growth options consultation.

i. Draft Vision and Growth Options

2.2 Devine Homes is supportive of the overall proposed vision for the district. Focussing on a stronger, resilient economy, healthy communities and improved connectivity are important in order to demonstrate that the emerging Local Plan can be demonstrated to support sustainable development, as defined by paragraph 8 of the National Planning Policy Framework 2021 (NPPF).

2.3 It is noted that the vision includes "growth centred on Canterbury". As the largest settlement within the District, this is appropriate. However, as discussed further below, it is important that the vision also ensure suitable and proportionate growth at other key settlements within the District, such as Whitstable. In doing so, this will support their role within the district as well as the local economies, thereby achieving the wider vision of enhancing existing communities, improving affordability across the district and enabling investment in local infrastructure.

2.4 Devine Homes is also supportive of the strategic objectives for the emerging Plan and as set out in Section 3, Land at Golden Hill is well positioned to sustainably support and deliver these objectives.

Growth options

2.5 As above, Devine Homes is supportive of the preferred option for growth. The NPPF provides in paragraph 11a that "*all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure...*"

- 2.6 In this context, it is important that any spatial strategy include growth of settlements on the coast such as Whitstable, in order to meet its development needs, avoid stagnation of the town centres and to support the future of existing businesses and facilities. Providing suitable growth at Whitstable will also align with the delivery of local infrastructure improvements through infrastructure contributions that would benefit both future and existing residents alike. For example, it is noted that the Town Centre Strategy identifies weaknesses that need addressing to maintain a healthy town centre, including congestion and a lack of cycle routes. Given the requirements of CIL Regulation 122, which requires any S106 obligations and contributions to be necessary and fairly related to the development, it is necessary for there to be suitable levels of growth at Whitstable, such that contributions and local improvements can be directed towards Whitstable town centre.
- 2.7 When considering the number of homes to be allocated to each settlement under any future spatial strategy, it is also important that the council consider the local housing need for each town, such as Whitstable, in order to deliver sufficient homes to meet the projected needs of the community and to ensure homes remain affordable for those who need them. In providing sufficient growth to support Whitstable across the plan period, the council will therefore be able to demonstrate that the emerging Local Plan achieves sustainable development as required by paragraph 16 of the NPPF.

Proposed housing requirement

- 2.8 Within the preferred growth strategy, the council proposes to allocate between 14,000 and 17,000 homes across the plan period, in excess of the 9,000 homes identified by the standard methodology.
- 2.9 The NPPF is clear at paragraph 11b that strategic policies should *as a minimum* provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless there are specific constraints or policies which provide strong reason for not doing so, or the adverse impacts significantly outweigh the benefits of doing so. The National Planning Practice Guidance (NPPG) paragraph 010 Reference ID: 2a-010-20201216 goes on to say that the government "*is committed to ensuring that more homes are built, and supports ambitious authorities who want to plan for growth*".

- 2.10 Paragraph 010 of the NPPG continues to state that the standard method does not predict the impact of changing economic circumstances or factors that might affect demographic behaviour, and that there will be circumstances where the actual housing need may be higher than the standard method, such as growth strategies, strategic infrastructure improvements and unmet needs arising from neighbouring authorities.
- 2.11 Overall, therefore, the proposed approach to deliver in excess of the housing need derived by the standard method accords with the principles of national guidance and policy. In principle, Devine Homes is supportive of the council's ambitious approach to delivering homes, to meet their local needs but also to drive economic growth and necessary investments in local infrastructure, on the premise that this also supports growth at sustainable locations at the secondary towns within the District, such as that proposed at our client's interest at the Land at Golden Hill.
- 2.12 Given the early stage of the Plan preparation, it is noted that there is limited evidence to support why the council consider 14,000-17,000 homes to be the appropriate amount to achieve the objectives in the Plan. Furthermore, as discussed under vi) below there appears to be limited evidence of the Duty to Cooperate with wider authorities who have unmet housing needs. Therefore, it is recommended that evidence is prepared at the earliest opportunity to support the Council's identified housing requirement, and to ensure ongoing engagement can be demonstrated with all relevant authorities under the Duty to Cooperate, and that this is published regularly and throughout future consultations and Examination.

ii. Housing need and New Communities

Issue HNC1: Right types and tenures of housing

- 2.13 The Housing Needs Assessment (2021) identifies a greatest need for three-bedroom homes across the district. Given town centre regeneration sites typically focus on smaller units, it is important that other sites on the edge of the settlements are allocated in order to deliver the full range of homes needed in each settlement. In this respect, Land at Golden Hill has the opportunity to sustainably deliver family homes to meet the identified need within the Housing Needs Assessment.

- 2.14 It is recognised that the council's preferred option for setting site-specific housing mix targets within allocation policy would provide the council comfort that the different types and tenures of homes required to meet local need are delivered. However, given the length of plan period (minimum 15 years), the housing needs within the council area could change. Therefore, any housing mix policies (either general or within allocation policies) must be sufficiently flexible in order to allow for changing demand in housing types, and allow for more up to date and locally specific evidence to inform any final housing mix.
- 2.15 Therefore, it is recommended that if the council seek to identify a preferred housing mix for each allocation site, this should be contained within the supporting text rather than policy wording, and be subject to an assessment of local housing need, emerging design principles and surrounding character analysis at the time of an application.

Issue HNC2: Small and medium sized housing developments

- 2.16 As per the consultation wording, the spatial strategy focuses predominantly on larger (800+) sized housing developments. However, it is important that the council allocate a range of different housing sites to support a rolling five year housing land supply across the Plan period. To achieve this, the council should seek to include allocation of medium sized sites, such as Golden Hill, which can come forward early in the plan period whilst larger strategic sites are progressing through the application process.
- 2.17 Overall, Devine Homes is supportive of the council's preferred option (HNC2C) to take a proactive approach to identifying medium sites, including proportionate extensions to sustainable settlements to meet local needs. The council should be identifying medium sized sites at the coastal settlements, given their position within the settlement hierarchy and the opportunities to deliver sustainable homes in sustainable locations.

Issue HNC4: Making sure the right densities are delivered

- 2.18 The NPPF is clear at paragraph 124 that planning policies should support development that makes efficient use of land, taking account of the need for different types of housing, local market conditions, viability, availability of infrastructure and desirability of maintaining the local character whilst securing well-designed, attractive and healthy places.

- 2.19 Density is a crude measure which in and of itself does not take account of the character that can be achieved from different types of housing. Therefore, rather than dictating a density for each site, it is recommended that a place-making led approach that requires the efficient use of land and allows density to be informed by housing mix, surrounding character and any wider policy requirements for the site would allow flexibility to achieve a high quality place.
- 2.20 If the council seek to include densities within allocation policies, to be consistent with national policy to encourage efficient use of land, this should be a minimum density, to allow flexibility so that increased densities can be delivered where the applicant can demonstrate suitable character/design and achieve wider policy compliance, or to address any change in housing needs or mix at the time of the application.

Issue HNC6: Support sustainable living in new communities

- 2.21 Devine Homes agree that it is important for new developments and housing to be sustainably located to allow for a reduction in car travel and to encourage walking, cycling and use of local services. Therefore, the preferred approach identified by the council, to locate housing within 15 minute walking/cycling distance of key facilities such as shops and primary schools, is supported by Devine Homes.
- 2.22 As set out further in Section 3, Land at Golden Hill is ideally located within a 15 minute walk or cycle to shops, primary schools and other key facilities via safe pedestrian and cycle links, which could be further upgraded as part of the development. Therefore, Land at Golden Hill is well-located to support the council's proposed policy approach.

Issue HNC7: Ensuring all design is high quality

- 2.23 Devine Homes would be happy to engage with the council, community and stakeholders in the preparation of the Local Plan to embed design and place-making principles into any proposed allocation at Land at Golden Hill, and is therefore supportive of the preferred approach HNC7C.

Issue HNC8: Low Carbon and Energy Efficient Housing

- 2.24 Devine Homes are supportive of minimising energy efficiency in housing and recognise the importance of mitigating and adapting to climate change.

2.25 The government are progressing the Future Homes Standard to improve energy efficiencies in new homes through updated Building Regulations. In order to ensure the Local Plan aligns with future requirements set out by government, Option HNC8B (early introduction of Future Homes Standard) is recommended. However, any policy should be flexibly worded to allow for any changes in Building Regulations across the lifetime of the plan.

2.26 In the event the council progress with net zero-carbon operational emissions, this should be robustly evidenced to ensure it does not render the plan, and allocations within the plan, unviable.

Issue HNC8: Improving Water Efficiency

2.27 Devine Homes are supportive of the approach to optimise water efficiency and the recycling and reuse of water resources.

Issue HNC8: Incorporating renewable energy in new developments

2.28 Devine Homes is also supportive of maximising renewable energy generation from the site. However, any policy will need to allow flexibility to consider the site context and therefore any policy should allow for evidence to be submitted at application stage to demonstrate that the optimum renewable energy generation has been achieved on a site by site basis.

Issues HNC10: Accessible and disability-friendly homes

2.29 Devine Homes is supportive of accessible and disability-friendly homes. Where the evidence can be demonstrated to support the provision of 15% of units at M4(2) standards and 5% of units at M4(3) standard, Devine Homes would be supportive of the policy.

Issue HNC13: Opportunities for self and custom-build housing

2.30 It is important that the Local Plan identifies sufficient opportunities to accommodate self and custom-build housing within the authority, at a rate that reflects the demand identified on the council's self-build register.

- 2.31 In the event the council seek for large or strategic sites to deliver self-build homes, the policy should be sufficiently flexible such that the provision of self-build accommodation is dependent on there being an identified need at the time of any application.

Issue HNC14: Maximising the benefits of strategic infrastructure investment for residents and businesses.

- 2.32 As set out on the consultation webpage, the council's evidence highlights that there is a need for additional secondary school places at the coast, and therefore in the Plan period there may be a requirement for a new secondary school in the coastal area.
- 2.33 The need for new infrastructure should be a key consideration in the council's assessment of spatial strategy, including where to locate new homes and how many per settlement. Given there is an identified need for a new secondary school in the coastal area, and a critical mass of students is necessary in order for a school to be operationally viable, it is necessary for the council to ensure the spatial strategy allocates sufficient homes within the coastal area to support any such school. Furthermore, from allocation sites, the council can secure infrastructure contributions that would support the delivery of the school.
- 2.34 As mentioned within the council's evidence, together with providing additional secondary school places to support the local coastal population, a new secondary school on the coast would have the added benefit of reducing the distance that residents must travel by car, and reducing congestion into the existing secondary schools. This is supported as it would reduce carbon emissions and support the council's agenda to mitigate against climate change.
- 2.35 As one of the two major coastal towns within Canterbury City Council's authority boundary, Whitstable is a logical location to allocate growth in order to support such infrastructure objectives. Land at Golden Hill is also located adjacent to the A2990, with easy access onto Thanet Way (A299), and therefore easy access to any new secondary school between Whitstable and Herne Bay (as shown on the preferred Vision and Growth Strategy).

Issue HNC16: Make sure infrastructure is delivered at the right time to support development

- 2.36 Devine Homes is supportive of the provision of necessary infrastructure to support growth of both the economy and in terms of housing provision within Canterbury City Council's area.
- 2.37 The NPPF states at paragraph 20 that strategic policies are required to make sufficient provision for infrastructure, and at paragraph 16 that plan-making authorities should engage early with infrastructure providers to understand what may be required. As part of the preparation of the emerging Local Plan, the council will need to prepare an Infrastructure Delivery Plan (IDP) which will highlight the key infrastructure required within the administrative area and how this will be delivered and funded.
- 2.38 Devine Homes is happy to work with the council to understand how Land at Golden Hill may contribute to any necessary infrastructure identified for the coastal town.

Issue HNC17: Addressing changes in development viability at the planning application stage.

- 2.39 Devine Homes envisage that Land at Golden Hill will be able to viably deliver a policy compliant scheme, subject to further consideration of detailed policies as they are drafted and consulted upon.
- 2.40 Devine Homes is supportive of the provision of affordable housing on the site to address local needs, and also the contribution to any infrastructure requirements as identified as reasonable and necessary through the plan-making process (i.e. the CIL Regulation 122 tests).
- 2.41 Nevertheless, the Local Plan will cover a period of minimum 15 years, in which time unanticipated situations may arise that affect viability of sites. Therefore, to ensure that the policies contained in the emerging Plan do not hinder the delivery of sites across the plan period, it is important that policies are flexible and the opportunity to address viability at application stage are maintained.
- 2.42 Therefore, as it is not possible to predict what may change in the future after the adoption of any Plan, if the council seek to fix any factors contained within a viability assessment, there must be sufficient flexibility to ensure the policy does not become out of date or in the long term prejudice the delivery of much needed homes.

- 2.43 Importantly, the NPPG is clear at paragraph 013 Reference ID: 10-013-20190509 that where benchmark land values are being established, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence, and that this is an iterative and collaborative process. Therefore, Devine Homes would welcome the opportunity to engage with the council to identify suitable land values for Land at Golden Hill.

iii. Movement and Transport

Issues MT1: How to maximise active travel in the district

- 2.44 As set out within the consultation webpage, promoting active travel is important for both the health of future communities but also contributing to reduced vehicular transport and therefore reducing carbon emissions across the plan period. Therefore, it is important that sites are allocated that can inherently encourage active travel and do not require future residents to use private vehicles for all trips.
- 2.45 In this respect, Land at Golden Hill is well located with opportunities for safe walking and cycling to a range of facilities within 15-minute radius, including primary schools, shops, pubs, restaurants, leisure facilities and employment in Whitstable and Seasalter, as well as the more immediate facilities such as Tesco Extra to the east. Finally, the site is a 9 minute cycle ride on the Thanet Way to employment zones, as well as other facilities nearby such as Jagow House Business Centre.
- 2.46 Overall, Devine Homes is supportive of the council's proposed approach to require developments to show how they will maximise opportunities for walking and cycling. In order to achieve sustainable development that focuses on active travel, it is critical that the site allocations are suitably located to deliver this objective, and Land at Golden Hill is a logical suitable and sustainable option to achieve this.
- 2.47 Further information on the site's sustainability is contained in Section 3.

Issue MT2: Supporting greater use of public transport

- 2.48 Similar to Issue MT1, Devine Homes is supportive of the principle of a policy that requires proposals to demonstrate how they maximise access to the local bus network and can show access to a rail network. In considering suitable sites for allocation, the council should have regard to paragraph 105 of the NPPF which recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in plan-making.
- 2.49 Land at Golden Hill is located within a 5 minute walk of the bus stop on Millstrood Road, via existing safe and designated footpaths on Thanet Way. This bus stop provides a route to Canterbury City Centre, as well as Whitstable station.
- 2.50 Whitstable station is c. 1.3km north of the Site, with Southeasters train services connecting to London, amongst other destinations. The site is a 6 minute cycle to Whitstable Station along the Crab and Winkle Way which provides safe off road cycling opportunities.
- 2.51 Access to public transport options would be further enhanced through the new bus routes/ stops to be provided as part of the development at the allocated and permitted 'Land at Thanet Way' site to the north.
- 2.52 Overall, Devine Homes is supportive of the approach to encourage and maximise opportunities for public transport use. Land at Golden Hill is well connected to the surrounding public transport network, and therefore would align with this objective.

Issue MT3: Zero emissions vehicles

- 2.53 Devine Homes is supportive of electric vehicle charging points within the development, to support the transition to zero-emission vehicles. Devine Homes reserve the right to comment on any proposed detailed policy.

Issue MT4: Parking Standards

- 2.54 Devine Homes is supportive of the council's approach to review parking standards to reduce car parking in the most sustainable locations whilst allowing for enough spaces in suburban areas to ensure that parking is suitably accommodated to avoid any unplanned on-street, or on-pavement, parking.

- 2.55 Devine Homes is further supportive of the provision of cycle parking to support the use of bicycles on the surrounding networks identified above and in Section 3.

Issue MT5: Transport Assessments, Transport Statements and Travel Plans

- 2.56 The provision of Transport Assessments / Statements and Travel Plans with any application is standard practice and Devine Homes is supportive of this approach to ensure developments are robustly assessed.

iv. Historic and Natural Environment

Issue NE1: Protect and enhance heritage assets

- 2.57 Paragraph 16 is clear that policies should “*serve a clear purposes, avoiding unnecessary duplication of policies that apply to a particular area, including policies in this Framework where relevant.*”
- 2.58 The government consulted upon their White Paper for planning reform in 2020, where they identified the potential for detailed policies to be incorporated solely within national policy. Whilst the government are yet to confirm how they propose to take the White Paper forward, the council should monitor this which may influence the wording and requirement for policies to be proposed within the emerging Local Plan. Devine Homes reserve the right to comment on any future policy wording.

Issue NE3: Biodiversity and green and blue infrastructure

- 2.59 Devine Homes is supportive of the overall ambition to ensure biodiversity net gain. The Environment Bill proposes a legal requirement for 10% biodiversity net gain. It is recommended that any increase above this (such as the 20% net gain proposed by the preferred option) should be considered against wider policy requirements to ensure that such a policy would not render development or the Local Plan unviable or deliverable.
- 2.60 Furthermore, any policy for biodiversity net gain should be clear that calculations for net gain can include land proposed for open space provision if suitably planted and maintained. This would encourage the incorporation of landscaping and wildlife into the built form which also have demonstrable impacts on health of future residents.

Issue NE4: Landscape currently protected under Canterbury AHLV

- 2.61 Land at Golden Hill is not located within the AHLV. It is recognised that the council's preferred option would delete the AHLV and replace it with a criteria based approach, setting out considerations for development which might impact on the landscape surrounding Canterbury City. The consultation page notes that the policy would extend out further than the existing AHLV boundary, "*but proposals on areas of low quality landscape with no significant impacts on the setting or views would not be impacted greatly.*"
- 2.62 Devine Homes reserve the right to comment on such a policy once drafted. However, it is important that any policy is clear that it relates to the landscape character and setting of *Canterbury specifically*, in order that it is not applied as a general landscape policy that may hinder the authority's ability to deliver much needed homes in locations that do not affect the setting of Canterbury, such as at Golden Hill.

Issue NE11: Maximise the benefits of SuDS

- 2.63 The NPPF states at paragraph 169 that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. On this basis, and subject to a review of any draft policy wording, Devine Homes raise no objection to the incorporation of SuDS on major development sites, including Land at Golden Hill.

v. Sustainability Appraisal (SA)

- 2.64 Devine Homes support the conclusions that the growth options which include additional homes over and above the standard method housing need generally score well in terms of housing, economy, opportunities for sustainable transport and health, as the opportunities for investment and infrastructure improvements are greater when additional homes are planned for.
- 2.65 It is pertinent that *distribution* of the 14,000-17,000 homes within the city's administrative area is not identified at this stage. Therefore, the outcomes of the Sustainability Appraisal can only be relied upon as a high level sustainability summary for different options presented at this stage. Moving forwards, additional detailed work that considers different levels of growth at Whitstable is necessary to ensure the proposed spatial strategy takes account of the needs of all communities moving forward.

- 2.66 In this regard, whilst the overall preferred strategy focuses on upgrades and improvements to Canterbury as a city, it is important in the ongoing SA work that options for the distribution of growth, and resultant benefits and impacts on coastal towns, are considered thoroughly. Suitable growth of the coastal towns, such as Whitstable, will be necessary to ensure there is adequate investment in infrastructure (e.g. secondary school) and there are homes to support local employment opportunities and facilities.
- 2.67 As part of any assessment of the benefits and impacts of different growth scenarios on Whitstable, this should include an assessment of the sites that are available to accommodate such housing growth. This will allow the council to understand clearly, and the SA to robustly assess, the opportunities available at Whitstable to support its position as a sustainable town in the settlement hierarchy.
- 2.68 These assessments must be undertaken concurrently and iteratively, in order to ensure that any strategy suitably supports all communities within the authority area, including Whitstable.
- 2.69 Devine Homes reserve the right to review and comment on any future Sustainability Appraisal.

vi. Duty to Cooperate

- 2.70 Under the Localism Act 2011, the Duty to Cooperate is a legal duty for Canterbury City Council to engage constructively, actively and on an ongoing basis with neighbouring authorities to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters.
- 2.71 The NPPF goes on at paragraph 26 to state that "*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy*".
- 2.72 Supporting the consultation are two Statements of Common Ground, with Ashford Borough Council and Dover District Council. For both of these authorities the council's agree that they are within separate Housing Market Areas and that each authority will accommodate their own housing needs. Key areas of overlap relate to retail assessments and impacts of any growth on retail markets.

- 2.73 Whilst the council has engaged with its direct neighbours, both the Sevenoaks and Tonbridge and Malling Local Plan examinations have recently failed to demonstrate they have met the Duty to Cooperate, and each have significant levels of unmet need to be accommodated. Given the Duty to Cooperate does not specifically apply to directly neighbouring authorities, in this strategic context it is important that the council engage constructively and early with these wider authorities to identify any opportunity or suitability to accommodate their unmet housing needs.
- 2.74 Devine Homes reserve the right to comment further on the council's Statements of Common Ground and any further evidence supporting Duty to Cooperate with all relevant authorities in future stages of preparation and consultation on the Local Plan.

3.0 LAND AT GOLDEN HILL

3.1 Land at Golden Hill has been promoted to the council through the Call for Sites in June 2020.

3.2 The Site represents an excellent opportunity to deliver sustainable residential development at the urban edge of Whitstable for circa 90 new homes. The site is surrounded by existing settlement of Whitstable on the eastern side, and the northern boundary of the site is defined by the Thanet way (A2900), beyond which are previously allocated land under Policy SP3 – Site 7, for which 400 dwellings have been approved together with an extension to the Duncan Down Country Park. The allocation site is under construction.

3.3 The Call for Sites submission set out how the site is suitable for development, achievable and deliverable and therefore appropriate for allocation in the emerging Local Plan. A summary of the submission is set out below, particularly highlighting how the site can inherently achieve and deliver the objectives sought by the council in their draft Vision and Options Plan:

- Within safe and easily accessible 15 minute walking and/or cycling distance to a range of facilities, thereby being well located for residents to travel sustainably:
 - Tesco Extra (600m east of the site).
 - Business and employment uses such as Jagow House Business Centre, as well as wider employment along Thanet Way to the north east and within Whitstable Town Centre.
 - Prospect Retail Park.
 - Primary schools in Whitstable Town Centre and Seasalter, as well as Whitstable secondary school.
 - GP facilities in Whitstable and Seasalter.
 - Pubs, restaurants and other leisure activities.
 - Recreational and sports facilities at Chestfield Cricket Club, Whitstable Sports Centre, Duncan Down, Whitstable Football Club and Cricket Club.
 - Within 5 minutes' walk of bus stops on Millstrood Road which connect to Canterbury.
 - 6 minute cycle to Whitstable Station along the Crab and Winkle Way.

- Opportunity for open space within the site, particularly to the south which would maintain views of the AHLV, provide opportunity for biodiversity net gain, provide on-site recreation, and provide a defensible boundary to the edge of Whitstable.
- Delivery of a range of homes to meet the local needs, with opportunity to provide much needed family housing as identified within the Housing Needs Assessment 2020.
- The site can deliver energy-efficient homes early in the plan period, to support the council's housing land supply whilst larger developments at Canterbury are progressed. Furthermore, this provides opportunity for the early delivery of affordable housing in Whitstable.
- Opportunity to deliver homes with walking and cycling connections to employment, to support the local economy of Whitstable.
- Well-located to support the delivery of infrastructure in Whitstable, through contributions (where identified to be necessary), such as towards a new secondary school to support coastal communities.

3.4 Therefore, the site is well located and a logical extension to Whitstable that would support the council's objectives for the area in the emerging Local Plan, and is well-positioned adjacent to existing and under construction housing.

4.0 CONCLUSIONS

- 4.1 Overall, Devine Homes is supportive of the council's preferred strategy for growth within the administrative area. It is commended that the council are proposing to allocate additional homes, over and above the standard method, in order to support infrastructure delivery to the benefit of existing and future residents.
- 4.2 Together with a strategic extension to Canterbury, it is important that other sustainable towns are supported with proportionate growth in order to support the existing facilities within Whitstable Town Centre and to support localised infrastructure improvements and projects that would inherently support the sustainability of the town. In particular, the provision of a secondary school to serve the coastal towns is commended in order to reduce the number of trips made to Canterbury and therefore support reductions in length of vehicle trips and improve air quality. The allocation of proportionate growth to Whitstable would help to deliver such a facility.
- 4.3 The overarching approach to detailed policy matters, such as (but not exclusively) sustainable movement, landscape, biodiversity net gain and energy efficiency is supported by Devine Homes. The council should ensure that any policies are sufficiently flexible to allow for any change in regulations throughout the lifetime of the plan, and to allow for the efficient delivery of homes.
- 4.4 Land at Golden Hill has the opportunity to deliver on the council's objectives in a sustainable location that would be a logical and suitable extension to Whitstable. Therefore, Devine Homes would be happy to meet with the council to discuss the opportunity further.

APPENDIX 1
GOLDEN HILL SITE PLAN

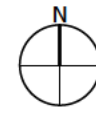


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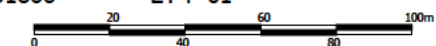
LEGEND

 Site Boundary



Project
**Land at Golden Hill,
 Whitstable**
 Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
25.06.2020	1:2,000 @A3	ML	JF
Project No	Drawing No	Revision	
31866	ET-P-01	-	



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