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Planning and Development
Canterbury City Council
Military Road
Canterbury
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12th January 2023

Dear Sir/Madam,

REPRESENTATIONS TO CANTERBURY CITY COUNCIL'S REGULATION 18 CONSULTATION OF THE DRAFT LOCAL PLAN TO 2045 – LAND AT GOOSE FARM, SHALLOAK ROAD

Iceni Projects, on behalf of Quinn Estates ('QE'), welcomes the opportunity provide representations to Canterbury City Council's Regulation 18 Consultation of the Draft Local Plan to 2045 in respect of Land at Goose Farm, Shalloak Road (the 'Site').

QE considers that the vision for the District presented within the Draft plan is laudable and the Council should be commended for producing an ambitious plan which seeks to deliver substantial growth and investment in the District. QE supports the allocation of Land at Goose Farm within the new Local Plan for mixed-use development under Policy R24 to assist with meeting the District's housing and employment needs over the plan period to 2045.

Importantly, since the submission of the site in the Call for Sites process, the landowner has implemented planning consent for change of use of the land to the south for the stationing of workers' caravans (application ref: CA/18/01906), and the new access road has been built out. The enactment of this consent results in an opportunity to potentially improve upon the draft allocation, and two options for refinement are considered in greater detail within this representation.

These representations should be considered alongside the following supporting documents appended to this letter:

- Appendix 1 – Transport Note
- Appendix 2 – Indicative Drawings

a. Site and Surroundings

Goose Farm is a previously-developed site located to the west of Broad Oak, approximately 2km to the north-east of Canterbury. The site currently comprises several light industrial units and hardstanding which accommodates a number of small businesses; however, it is not protected for this use. The site has been assessed positively by the SLAA (ref SLAA235). In addition to the land identified above, QE has previously promoted an adjoining site (ref: SLAA221) to the Council for residential development, which was also assessed as suitable, available and achievable for residential development.

Goose Farm is located in a highly sustainable area, close to Sturry train station and bus services on Herne Bay Road. These bus routes provide comprehensive access from Broad Oak to employment, schools, retail and leisure facilities in the three main settlements in the Canterbury district. Both routes also connect to Sturry railway station to the south and Herne Bay railway station to the north, allowing onward connections to Canterbury, Ashford, London and along the Kent Coast.

From the site there are several amenities within the typical walking distance of 1.6km, representing a walk of up to 20 minutes. These include Broad Oak village shop, a butcher/deli, village hall and the Golden Lion pub. Sturry Primary School is slightly further at 1.8km.

Along with the majority of the District, the Site falls within the Stodmarsh Catchment Area and therefore would be required to demonstrate Nutrient Neutrality. However, the Site is not directly subject to any other planning constraints and therefore is highly suited for development.

b. Policy R24 – Land at Goose Farm

QE supports the positive approach to growth in the District and considers that the land at Goose Farm can assist in meeting rural housing and employment floorspace needs. The need for rural employment floorspace within the District is clear. The Economic Development and Tourism Study Update (June 2022), which forms part of the evidence base for the draft Local Plan, identifies a mismatch in future provision at a sub-District level, with a relative over-supply of land to accommodate growth needs in Canterbury City and insufficient capacity to accommodate future business needs in Whitstable and rural areas of the District. The Table below shows a comparison of Employment Floorspace Supply and Demand to 2045 by Sub Area:

Sub Area	Available Employment Floorspace Supply (sqm)	Reported Level of Market Demand [¥]		Demand / Supply Balance to 2045
		Office	Industrial	
Canterbury City	64,319	Low	Low/Moderate	↑
Herne Bay	70,571	Low	Moderate/High	↔
Whitstable	3,266	Low	Moderate/High	↓
Rural areas / rest of District	8,121	Low/Moderate	Low/Moderate	↓
District Total	146,277	Low/Moderate	Moderate	↓

KEY ↔ = adequate supply ↑ = over-supply ↓ = under-supply

¥ Based on property market analysis undertaken for the original EDTS

The evidence base supports highly suitable sites for employment such as the identified land at Goose Farm being proactively identified for development in the Plan. The approach is considered to be wholly consistent with the NPPF, which highlights in Para 81 that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach is also consistent with the requirements of Para 82 of the NPPF in proactively identifying the subject site, and Para 83 in making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. The policy allocation is also considered to be consistent with Paras 84 and 85, which promote supporting a prosperous local rural economy.

The policy allocation is also considered to be consistent with the NPPF Para 60, which states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The site is located in a sustainable location which benefits from good access to services and facilities in Sturry and central Canterbury. The site is available, suitable and achievable.

There are no obvious barriers to delivery, including that there are no constraints on the site such as ecology, trees, flooding and heritage, and the site is not dependent on the delivery of infrastructure before coming forward.

c. Proposed Evolution of Allocation R24

QE supports the allocation of the site under Policy R24 for mixed-use development. Nevertheless, an important contextual change has occurred since the site was submitted in the Call for Sites process. An additional access from Shalloak Road has recently been constructed in connection with a planning consent for stationing of caravans for agricultural workers (application reference: CA//18/01906). This site lies to the immediate west of the SLAA221 site and the access runs to the south of Goose Farm. QE considers that the enactment of this consent provides an opportunity to refine the allocation R24 and have explored two potential amendments.

In Option 1 the existing allocation would be taken forward, with the residential plot retaining access from the Goose Farm access and the employment plot taking separate access via the recently constructed southern access. As demonstrated in the planning application for the caravan site, this access can already accommodate commercial vehicle movements. The Transport Note submitted with this representation details how this would have amenity and safety benefits for existing and proposed dwellings by separating commercial vehicle movements from residential areas and would not generate any more traffic on the local highway network than the draft allocation.

In Option 2 the existing allocation would be developed as a solely residential scheme using the existing Goose Farm access and could provide around 43 dwellings including affordable housing. The land to the south of the road (SLAA reference 221) could be included in the allocation – in part or in totality - and the employment use moved to this area of the site. See accompanying drawings appended to this letter to illustrate potential locations. This option would result in a marginal increase in commercial provision. It could sit in line with the approved workers' caravans, but could still be heavily screened such as to preserve openness and rural setting of the street scene. This could also enable additional residential units on the Goose Farm site, and would separate the residential and employment uses. It would also allow the remaining former orchard area to be used as a wooded biodiversity area.

QE respectfully requests that these potential amendments to the allocation are considered by the Council as opportunities to refine and enhance the site and are keen to discuss the options with the Council further throughout the Development Plan process.

d. Summary

On behalf of Quinn Estates, we thank you for the opportunity to input into the Canterbury District Local Plan Regulation 18 Consultation. As detailed above, the Land at Goose Farm is a deliverable and sustainable site and should remain allocated in the emerging Local Plan for mixed use development. Quinn Estates support the allocation and consider that the construction of the new access from Shalloak Road offers an opportunity to refine the allocation. Including land to the south of Goose Farm, a site which has already been positively assessed by the Council, within the allocation offers several benefits, namely the opportunity to separate the land uses and increase the provision of housing and employment floorspace on this site.

I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. We also confirm that we would like to be involved in future stages of the plan-making process. However, should you require any further information, please do not hesitate to contact me on [REDACTED] or [REDACTED]

Yours sincerely,

Sarah Willson
Planner

