

Policy N26 - Land at Beacon Road

I wish to object to the allocation of the area of private open space, to the west of Beacon Road, for residential development as proposed under Draft Policy 26

I appreciate that, from an initial view, this site could easily be considered to be Brownfield or, Previously Developed Land. This is due to the fact that the site has not been maintained by its current owners (Canterbury City Council) since the former uses (Tennis and Hockey) were relocated. Only a few years ago the site was a thriving private sports facility. I feel that this point is especially relevant as the current landowners are also the planning authority. Therefore, in promoting its own land for development, the Council must be fully open about the process it has been through to reach this decision, in order to fully negate any possibility that the process could be subject to Judicial Review. It should be clearly demonstrated that the proposed use, and possible alternative uses, have been open to at least the same level of scrutiny as if the land was being promoted by a private landowner or developer.

It is appreciated that the planning authority needs to find adequate land that is available for development in order to meet its housing requirement in the emerging Local Plan. In this regard all possible sites will have been considered and assessed. Allocating Greenfield land for development is always contentious and it is clearly necessary, and sustainable, to make use of Brownfield land, especially within a built up area, before Greenfield land is allocated for development. However, when assessing the suitability of Brownfield urban sites for development, it is important to assess that the brownfield status has not been deliberately created, by neglect or lack of management and that continuation of its existing, or former, use could not be maintained, re-established or that a similar, policy compliant use cannot be found.

The site is currently within a Conservation Area and also subject to an Open Space planning policy as a Protected Open Space in the existing Local Plan. This is recognised in what I have been able to find in the Council's planning pages on its website (SHLAA and associated documents). What I have been unable to find is how it has been concluded that residential

development is the only a suitable use for the land, how the Conservation designation has been considered, what other open uses could be appropriate.

The land is in a Conservation Area and part of the Green Infrastructure of Herne Bay and as such should be preserved for its setting and special character. It is of clear public benefit which would be removed by development. The land has already been accepted by and registered by the Council as an Asset of Community Value. In addition, the Council's own Open Space Strategy states that Herne Bay has a shortfall of Open Space.

I feel that that as both landowner and planning authority the Council should be more open about how it has reached this point. The policy content (Concept Masterplan, Development mix (and density), Design layout, Landscape and Green Infrastructure and Access and Transportation sections setting out the parameters for the development do not appear to have any background. If a developer were to have proposed development on a site such as this I would have thought that all of the above, together with Ecology, Archaeology, Services etc would have been prepared and submitted prior to a draft allocation being made. I think that it is only fair and reasonable for the Council to make this information, for this site available at this stage.

The August 2025 SHLAA Summary of Site Submissions, confirms the former use (Tennis and Hockey Club) and reaches the conclusion that the site is Brownfield (as above I suggest that this conclusion may have been reached by lack of site management since these uses ceased). The SLAA Summary 'Outcome' section states 'Site is unsuitable for the proposed use as it is within a protected area of existing Open Space and would conflict with the adopted 2017 Local Plan (Policy OS9)' It then makes a significant leap forward in the Local Plan Status 2025 section where, whilst recognising the policy constraint, it considers that an appropriate mitigation strategy can be put in place to mitigate the loss of sports facilities. It fails to mention the loss of open space and then jumps, without justification, to the conclusion that housing is an appropriate use for allocation. This, by necessity, needs further explanation.

The fact that the site is within a Conservation Area (CA) is particularly relevant and it is not mentioned in the SLAA summary. As the tests and requirements for development within a

Conservation Area are far more stringent than for a planning application outside a Conservation Area, if this policy is to be retained the policy should set out much more information about the requirements for development and also why other more open and compliant uses have either not been considered, or have been considered and rejected.

The Herne Bay Conservation Area Appraisal 2008 goes into great detail about the town, it's heritage and how its development pattern has emerged for this particular area it states 'Within the major street block on the hillside east of the Canterbury Road is the open sports ground, concealed behind houses fronting the surrounding roads. This is large-scale private space. As noted earlier it is of great intrinsic historic interest in its own right, a planned feature of this part of the town since its inception, and should be protected as such. Spatially because of its size and open nature, it dominates its surroundings. It has great potential for enhancement through improved boundary treatment, access paving, perimeter planting etc.'

The land has a history of over one hundred years as being used for sport and leisure and an area of open space.

There are shortages of both educational and medical spaces in Herne Bay.

Herne Bay has a severe sewage disposal problem with overloaded public sewers and water quality/pressure issues. This has led to the water authority discharging untreated sewage directly into the sea on a regular basis , particularly after heavy rainfall – Great Stour WWTW (Stodmarsh) details these issues.

It is difficult to see how the above has been ignored.

The proposed housing allocation policy text makes conclusions and recommendations without any detail as to why.

Density and open space with reference to new policies and no reference to the historic context or how the net area or density has been calculated. Surely a proving layout should have been prepared?

Landscape without any context.

Access without any design showing that it can be achieved without additional third party land.

Protecting and enhancing heritage assets, of which its open nature is one

There is nothing I can find which suggested whether other policy compliant uses have been considered. In 2023 the Council declared a Biodiversity Emergency. This land has great biodiversity potential. There is an abundance of wildlife including a family of foxes, bats, bees and butterflies. There is an excellent opportunity here to provide a community orchard and/or garden with the possibility of some allotments (a past use). The local charity Herne Bay in Bloom and a local community group Beach Creative have expressed their interest in being involved in this proposal.

Access and parking. The streets here are already congested with residents on street parking (most homes having at least two cars) together with town centre workers parking in the road during the day and people attending events at the Kings Hall during the evenings. Beacon Road is used as a shortcut between Beltinge Road and Canterbury Road and access to the land from Beacon Road is very near Beltinge Road/Beacon Road crossroads which is very busy.

Overall, this seems to be a policy that has been hurriedly put together without adequate background work and where the end goal is more important than proper heritage, spatial and community planning. The policy should be withdrawn from the Local Plan.

Yours sincerely,
Trevor Huffey

