



# **Representations to Canterbury City Council Local Plan Regulation 18 Consultation**

**Re: Land West of Bullockstone Road, Herne**

**Prepared by Hume Planning Consultancy Ltd.**

On behalf of: Skylark Kent LLP

Our Ref: HPC/1618

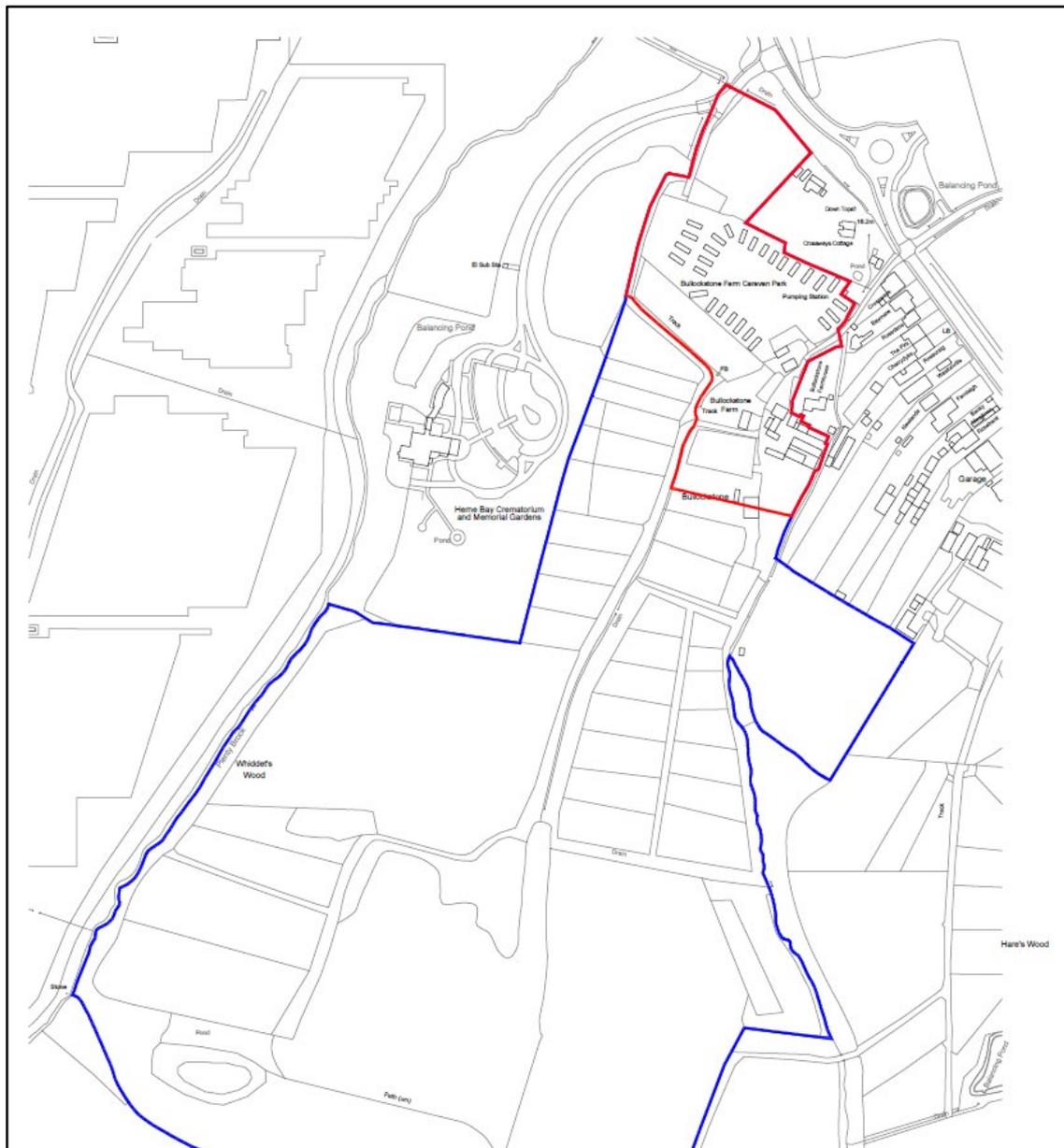
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## Contents

1. Introduction.....	3
2. Site Description and Context .....	5
3. Why the Site Capacity can be Increased .....	6
4. Yield and Delivery Timetable.....	7
5. Conclusion.....	7

## 1. Introduction

- 1.1 These representations are submitted on behalf of Skylark Kent LLP and relate to a 23.74-hectare area land parcel, identified on the plan below (outlined red). The land parcel is called 'Land West of Bullockstone Road, Herne' and is referenced in these representations as 'the Site'. The Site has direct access to the Bullockstone Road and the recently constructed roundabout which forms part of the under-construction Herne Relief Road. As a result, the Site now lies adjacent to a major transport corridor between Herne Bay and Canterbury.



**Figure 1.** Site Location Plan

- 1.2 Representations seeking the allocation of the Site for residential development of up to 95 dwellings, were previously submitted to Canterbury City Council, as part of the Council's 'call for sites' exercise in November 2024. Following this submission, the Council assessed the suitability of the Site for residential development as part of its Strategic Land Availability Assessment (SLAA), along with a range of competing site opportunities. This concluded the Site was suitable for residential development and should be identified as a housing allocation, resulting in the Site being included as a draft allocation in the current Regulation 18 version of the Draft Canterbury District Local Plan. This Site is allocated under Policy N30 for the development of up to 50 dwellings. The allocation is supported and is deliverable and achievable. However, these additional representations highlight that there is further housing capacity that could be achieved as part of an extended allocation, which could be secured by a rounding off of the allocation (as outlined below) within the existing built-up area of the Site. This could be achieved without additional landscape impact and would maintain a significant level of physical separation from the nearest residential properties.
- 1.3 The draft allocation for the Site comprises a 1.87ha area at the northern end of the Site, currently occupied by the Bullockstone Farm Caravan Park, with the access being from the shared access road for Herne Bay Crematorium, running west from Bullockstone Road, and landscape buffers to be provided on the southern and eastern site boundaries. Skylark LLP supports the inclusion of the Site as a selected Local Plan residential allocation.
- 1.4 As highlighted above these representations focus on the potential to increase the capacity of the housing allocation (Policy N30). An adjustment to the allocation is sought, increasing the site capacity from 50 to 75 dwellings and the allocated area by a further 0.7ha to 2.52 hectares in total, extending housing development within an area that already comprises mainly buildings and hardstanding. The Site Promoter would welcome the opportunity to hold a site meeting with the Policy Officers, to demonstrate that the extension of the allocation will not have an additional landscape impact or result in any loss of residential amenity (in the case of the latter because of the distances of separation that will be maintained).
- 1.5 This submission is supported by a concept layout outlining a potential range of up to 75 dwellings, at a density of approximately 30 dwellings per hectare gross within the

potential development area. It is also relevant that this level of development would provide 23 affordable dwellings (30%).

- 1.6 This additional submission seeking an extended allocation, relates to a previously developed area of the landholding that is the most visually contained and well related to surrounding development and the new settlement edge for Herne, created by the Strode Farm development to the east, with the recently constructed crematorium to the west. The landowners have a more extensive landholding beyond this land parcel and would welcome the chance to engage with Policy Officers to explore additional or alternative Land Uses if required, noting the Site's locational qualities and lack of constraints. These potential Land Uses, for the non-developed portion of the site, could include an offset biodiversity net gain credit site, a future expansion area for the crematorium or a solar farm, which would be more suitable for fringe areas of the overall landholding beyond the extended housing allocation that is sought.

## **2. Site Description and Context**

- 2.1 The Site fronts Bullockstone Road, Herne, which is a major planned movement corridor between Herne Bay and Canterbury, with good public transport connectivity and a high frequency service in both directions.
- 2.2 It is accepted by Policy Officers that Herne is a sustainable location for residential development, given the history of site allocations and permissions in the area.
- 2.3 The Site at present consists of a mix of residential caravans, free standing buildings and paddocks in connection with livery. The Site is therefore partly brownfield, with the paddocks and grazing land further to the south beyond. It is highlighted at paragraph 1.7 that these fringe areas may be suitable for a range of alternative lower impact uses, including BNG credit and solar or safeguarded expansion area for the crematorium beyond the site boundary. The Site has a low ecological value as established by previous ecological surveys.
- 2.4 As well as development on either side, the eastern boundary of the Site is screened by a linear pattern of frontage residential properties with large rear gardens accessed from the Bullockstone Road. The Site is also screened by perimeter hedgerows and a rise in the topography to the southeast and blocks of woodland, which restrict longer

distance views. Housing development on the identified developable part of the Site would also be screened by proposed strategic landscaping and would be buffered by the Land Uses identified for the peripheral areas of the site at paragraph 1.7 of this Statement.

2.5 The Site is otherwise unconstrained as summarised in the table below:

<b>Constraint</b>	<b>Relevance</b>
<b>Flood Risk</b>	Located within Flood Zone 1. Flood Zone 2 and 3 located 0.3km west of the site.
<b>Archaeology</b>	Not located within archaeological potential area.
<b>Landscape</b>	Within Area of High Landscape Value.
<b>Conservation Area</b>	Not located within or adjacent to a conservation area. Herne Bay Conservation Area located 0.45km east of the site.
<b>Listed Buildings</b>	Nearest Listed Building is adjacent to the northwestern boundary.
<b>Thanet Coast and Sandwich Bay Zone of Influence</b>	Located within SAMM designation.
<b>Tree Preservation Orders or Ancient Woodland</b>	Not located within or adjacent to the site.

**Table 1.** Summary of technical and policy constraints

### **3 Why the Site Capacity can be Increased**

- 3.1 It is considered that the current housing allocation extent and capacity can be extended further to the south to incorporate an additional area of previously developed land at the Site. This additional area currently comprises of sheds/barns, open storage areas and an equestrian paddock forming the yard of Bullockstone Farm.
- 3.2 This area of the Site sits at a similar elevation to the already allocated area and is well screened from its surroundings by existing vegetation to the east and west.
- 3.3 The inclusion of this area therefore represents a logical extension to the site allocation, which would allow the housing capacity of the site allocation to increase to up to 75 dwellings, further securing housing in this established sustainable location and helping to meet the District’s housing requirements.

## 4 Yield and Delivery Timetable

- 4.1 The Site is approximately 24 hectares in total area and therefore BNG will be addressed through on-site provision on the undeveloped portion of the landholding - the potential for which could be widened as a BNG credit site to facilitate other development opportunities within the District. Existing perimeter landscaping will be retained and strengthened by the proposals, extending the already planned edge of Herne Bay on this major movement corridor to Canterbury. There are no known ecological constraints.
- 4.2 The Site has been shown to be previously developed and is sandwiched between the Strode Park development and the crematorium. The area proposed for the extended allocation is 0.7ha within an overall surrounding landholding of 24ha i.e. less than 3%. The extended area (0.7ha) to the existing allocation of 1.87ha will be screened from longer distance views by the rising topography and blocks of woodland and is otherwise unconstrained in planning terms. An estimated development yield of 75 dwellings will be deliverable (an increase of 25 dwellings of which 8 will be affordable) alongside the potential land uses highlighted at paragraph 1.7 on the more peripheral areas of the landholding to the south.
- 4.3 The capacity of the Site on the previously developed portion of the site (highlighted on the accompanying layout plan) is estimated at 75 residential units based on density of approximately 30 dwellings per hectare. The range of housing to meet local need could include elderly, affordable units and a focus on first time buyers.
- 4.4 We would envisage a 2-year build programme to complete the development, which would follow the relevant permissions being secured. This would result in the full housing completions being delivered within two years of the plan adoption.
- 4.5 It is accepted that Herne Bay, including Herne, is recognised as one of the most sustainable locations for accommodating the districts future housing needs. The market is also strong, and the track record of housebuilders has demonstrated delivery, including the Strode Farm development to the east of this site.

## 5 Conclusion

- 5.1 Herne Bay is a sustainable location for growth, and it is asserted the moderate extension of the current site allocation to 75 dwellings should form part of the emerging spatial

strategy to provide choice and meet local need, capitalising on the fact that the extended area is already previously developed.

- 5.2 This existing housing allocation, if extended as proposed, could deliver 75 dwellings and a range of potential land uses on the wider undeveloped portion of the site, including BNG credit site, solar farm or safeguarded area for future expansion of the adjoining crematorium. The scale and location of housing is important in delivering choice to the wider spatial strategy for the borough, also bringing forward delivery completion timescales and being attractive to small and medium sized housebuilders.
- 5.3 It has been demonstrated that the Site is unconstrained in terms of landscape, heritage, flood risk and ecology. BNG requirements can be met onsite and there is additional potential for the balance of the site (via BNG credits) to facilitate housing delivery on other sites in the district. The Site can also be acceptably accessed for the increased housing capacity proposed (75 dwellings) from the new road infrastructure under construction as part of the Strode Park development.
- 5.4 Therefore for these reasons, it is requested that the existing Policy N30 housing allocation of 50 dwellings, should be increased in area by 0.7ha through the inclusion of the further, previously developed land and through increasing the allocated Site capacity by 50% to 75 dwellings.
- 5.5 We look forward to discussing this opportunity further with the Planning Policy Team.