

Herne Bay Urban Area

Policy HB4 – Land at Beacon Road

Objection

This Policy should be deleted from the Plan because neither the Landowner, Canterbury City Council (CCC) nor the Planning Authority (also CCC) appear to have undertaken the necessary background studies or submitted any evidence representations or assessments to support that the site is Suitable, Available or Achievable for development. This is a significant point, as much stricter tests should apply where the Landowner has the dual role as the promoter of the land and as the determining Authority.

Equally important is the site's location within the Herne Bay Conservation Area, where the Herne Bay Conservation Appraisal 2008 includes it within area HB 13 and notes its historic use as private and public open space. The tests here are by necessity even higher.

It is generally required that, even small schemes, including property alterations or extensions to existing dwellings, should be the subject of detailed planning applications and not outline applications. This is because the suitability of the site for development, or the property for alterations, need to be assessed in detail in order ascertain the full effect that they could have on the historic environment. This would normally include a Heritage Statement, Design and Planning Statement, Transportation Assessment, detailed Architectural Design and Access Design along with other supporting information. It is not only necessary to assess the proposed development itself, but also the effect it may have on adjoining properties, the wider Conservation Area and the effect of, in this case, the termination of the historic use, either in full or in part. I have been unable to find any of this information. It has not been explained how the current proposal has been reduced from the original proposal for the full development of the

site, to partial development or why, or how, these specific areas fit within the Concept Masterplan.

Site Policy HB4 requires various criteria to be met and additional information to be provided at the planning application stage, 50% Open Space, an average density, high quality-built environment, a Heritage Statement, undefined improvements to the existing access and 'surprisingly' to provide an appropriate mitigation strategy for the loss of sports provision on the site.

The site was, until recently, in regular use as a sports facility (Hockey and Tennis) but since these uses have relocated, CCC do not appear to have tried to find any suitable sports use for the site. They are, however, now requiring the developer to fund 'appropriate mitigation' for this loss, which seems somewhat strange. There appears to be no evidence that the Council have considered the continuation of the existing use or an alternative policy compliant use.

Since the sporting use of the site ceased there seems to have been no management of the site by CCC, to the point where it is now overgrown and has what appears to be a thriving wild environment and habitat. In fact, the use of the site as any form of open space or sporting activity was terminated by the council when it prevented access by gating and blocking the access. It would be easy to reach the conclusion that this deliberate action by the Council, was to reduce a sporting facility to what could now be classified as a Brownfield Site, to support its proposals for the redevelopment of the land. Now, with the land in its current overgrown state, CCC make no mention in the Policy for the need of an Ecological Survey, so it is not known what may be growing there, or living there, whether rare or not, which may need special treatment or translocation as part of a planning assessment.

Looking at the site-specific **Strategic Housing Land Availability Assessment (SHLAA) of the site for the Reg 18 Plan (Autumn 2025)**, it notes that;

- 1) **The site is Brownfield**, something that was created by CCC by not maintaining the land and then locking the gates to prevent access. The Brownfield status has been created by the Landowner and it is now being used as an argument to support development.

2) **The access needs to be improved.** It does not however, specify what needs to be done and in a Conservation Area, surely this should form part of a detailed site proposal, not something to be done once the principle of development is established by an allocation in the Local Plan.

3) **Could be sympathetically designed to ensure the Conservation Area can be preserved.** ‘Could?!’ What if it can't be sympathetically designed. This is far too vague to be used to support a Local Plan allocation. Either it can, or it can't. A Design or Development Brief should have been prepared to demonstrate how the site can be sympathetically designed. This statement alone makes it clear that the relevant work has not been done to support this allocation.

4) **If, however, the development of the site was to result in less than substantial harm to the designated Heritage Asset the benefits of the site would need to be weighed against the wider benefits of the development of the site.** Again, this is something that should have been done before the site was proposed as an allocation as it could prevent the site being considered for development.

5) **The site is within the built-up area and is unlikely to create significant visual impact on landscape ‘subject to design’.** Again, something that should be known now, not left until the principle of development has been established in this Plan. It should be noted that the site is in the main surrounded by established Victorian/Edwardian properties.

6) **Not particularly sensitive regarding biodiversity.** How has this conclusion been reached? Where is the evidence? Have the provisions of the Council's Biodiversity Strategy been taken into account?

7) **Could be designed in such a way that it would not unacceptably impact on the residential amenity of the nearby residential occupiers.** ‘Could’ This is something that is essential to the principle of development and it does not seem to have been given the attention needed. Enough work should have been done and made publicly available to demonstrate that the design ‘can’ be designed so that it does not affect residential amenity, for the allocation to have reached this stage. Any identified

constraints could affect the yield from the site. So how have the scheme numbers and density been ascertained?

8) The entire site is within a protected area of open space in the adopted

Local Plan. It has not been explained why this policy should no longer apply. If it was no longer important what has changed? Canterbury CC have themselves stated that there is a lack of Open Space in Herne Bay and in particular in Heron Ward where the land is situated. The Councils' Policy HB3 states that the Council will seek to protect and enhance Open Spaces and its Policy DS21 states that the Council is committed to Biodiversity gain and enhancement in the area. Have the provisions of the Council's Open Space Strategy been taken into account?

The above is from a document that is intended to assess the suitability of the site for development. It seems to leave significant areas of doubt, to the point that the development potential can't be quantified, properly assessed or relied upon. I feel that the work done by the Landowner (CCC) to promote this site is well below that required of landowners or developers in their promotion of other sites. CCC as planning authority should have been more transparent and demanding of their colleagues and should have requested better information in order to reach the conclusion that this site is worthy of allocation in this Plan.

Acting in the dual role of Landowner and Planning Authority CCC should have worked hard to make the allocation of this site unquestionable. In my view they have failed to provide justification that the site is Suitable, Available or Deliverable.

The removal of this site from the Plan, with the very small number of homes proposed will not affect the overall strategy of the Plan with regard to meeting the District's Housing Requirement.

CCC as both Landowner and Planning Authority have not demonstrated that the site is deliverable, no developer has been identified, it will necessarily be a bespoke scheme as it is within the Conservation Area, so build costs are not known and as this cannot be

ascertained until a detailed scheme is approved. The site has not been promoted adequately for it to be considered as an allocation.

The site should be removed as an allocation in this Plan.

National and Local Planning policy supports the sustainable development of housing on suitable sites within urban or built-up areas. This will not stop either CCC, or a developer, making a speculative detailed planning application for residential development (windfall) on this site if this Local Plan is adopted without this allocation. At the detailed application stage it would be possible to address all of the issues raised above to enable such an application to be determined properly, favourable or not.
