



Representations to Canterbury City Council Local Plan Regulation 19 Consultation

Re: Land West of Bullockstone Road, Herne

Prepared by Hume Planning Consultancy Ltd.

On behalf of: Skylark Kent LLP

Our Ref: HPC/1618

Date: May 2026

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1. Introduction

- 1.1 These representations are submitted on behalf of Skylark Kent LLP and relate to a 23.74-hectare area land parcel known as Land West of Bullockstone Road, Herne and is referenced in these representations as ‘the Site’. The Site has direct access to 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.
- 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), finding the site to be suitable for residential development and for such a development to be achievable and deliverable on the site. This resulted in the site being included as a draft allocation in the previous Regulation 18 ‘Focused Consultation’ version of the Draft Canterbury District Local Plan in September 2025, with the site being allocated under Policy N30 for the development of approximately 50 dwellings.
- 1.3 Further representations were submitted to the Council in October 2025 as part of the consultation on the ‘Focused’ Regulation 18 version of the draft local plan. These representations sought to highlight that an increase in both the area and capacity of the site allocation could be achieved, while maintaining the development principles set out in Policy N30, principally an average density of 35 dwellings per hectare across the site and the establishment of strong landscaping buffers along the boundaries of the proposed developable area. These representations sought an increase in the area of the site from 1.87ha to 2.52ha and an uplift in the site capacity to approximately 75 dwellings.
- 1.4 The site has been maintained as an allocation in the current Regulation 19 version of the Local Plan, under allocation Policy HB10 ‘Land to the west of Bullockstone Road’ with a development capacity of approximately 50 dwellings. The allocation for the site comprises an area of 1.87ha 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 fully confirms its support for Policy HB10 which seeks to allocate the site for residential development.

- 1.5 The site was further assessed in the February 2026 Update to the Council's SLAA under reference SLAA350. The representations submitted to the Regulation 18 Consultation were considered by the Council, however it was recommended that the proposed allocation remains at 50 dwellings due to general concerns about the landscape impact, accessibility and built form impact of the suggested extension to the south of the allocation.
- 1.6 This submission maintains support for the 50-dwelling allocation, and Skylark LLP affirms that the delivery of a 50-dwelling scheme as set out in Policy HB10 remains achievable on the site. Small-medium sized sites such as this can be delivered faster than larger strategic sized sites, ensuring that housing comes forward in the early stages of the plan period. It is an efficient and effective use of the land for residential development to be directed to the site.

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 established that Herne is a sustainable location for residential development, given the history of site allocations and permissions in the area. Expansion around Herne, accommodating the growth of Herne Bay has occurred most recently as a response to development pressures in the District and the lack of acceptable alternative directions of growth. It is considered that the principle of the residential development of the site is established by the site's allocation within the current Regulation 19 version of the Local Plan.
- 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 paddocks and grazing land further to the south beyond. 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 Bullockstone Road. The

Site is screened by perimeter hedgerows and a rise in the topography to the southeast alongside 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 to act as a buffer to the site's more open surroundings.

2.4 The Site is otherwise unconstrained as summarised in the table below.

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

Table 1. Summary of technical and policy constraints

3. Yield and Delivery Timetable

- 3.1 The Site allocation has an area of 1.87ha. BNG will be addressed through on-site provision on the undeveloped portion of the landholding. Existing perimeter landscaping will be retained and strengthened by the proposals, extending the already planned edge of Herne Bay on this major movement corridor towards Canterbury. There are no known ecological constraints.
- 3.2 The Site has been shown to be previously developed and is sandwiched between the Strode Park development and the crematorium. It is screened from longer distance views by the rising topography and blocks of woodland and is otherwise unconstrained in planning terms.

- 3.3 The capacity of the Site is estimated at 50 residential units based on density of approximately 35 dwellings per hectare. The range of housing to meet local need could include elderly, affordable units and a focus on first time buyers.
- 3.4 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.
- 3.5 It is accepted that Herne Bay, including Herne, is recognised as one of the most sustainable locations for accommodating the District's 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.

4. Conclusion

- 4.1 With specific reference to the proposed allocation Land West of Bullockstone Road (HB10), we confirm that the site is available and a suitable site for residential development. It is therefore an achievable and deliverable allocation.
- 4.2 Hume Planning supports the spatial strategy which distributes a proportion of its growth to smaller/medium sized settlements in the district, with local centres such as Herne, receiving some growth to sustain their role in the settlement hierarchy over the plan period, serving the needs of its own residents and those within surrounding villages and hamlets. Herne Bay, including Herne, is a sustainable location for growth and the current site allocation for 50 dwellings should remain part of the spatial strategy to provide choice and meet local need. Also, a site of this size is attractive to small and medium sized housebuilders due to the likely quick delivery of the site.
- 4.3 It has been demonstrated that the Site is unconstrained in terms of landscape, heritage, flood risk and ecology. BNG requirements can be met onsite. The Site can also be acceptably accessed from the new road infrastructure under construction as part of the Strode Park development.
- 4.4 Hume Planning Consultancy, on behalf of Skylark LLP, welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course.