

Subject: Objection to Policy HB4 – Land at Beacon Road, Herne Bay
Draft Canterbury District Local Plan Regulation 19 Consultation

To: consultations@canterbury.gov.uk
Planning Policy Team
Canterbury City Council
14 Rose Lane
Canterbury
CT1 2UR

Dear Planning Policy Team,

Objection to Policy HB4 – Land at Beacon Road, Herne Bay

I am writing to formally object to the proposed allocation of **Land at Beacon Road, Herne Bay**, identified as **Policy HB4 / SLAA374**, for residential development in the Draft Canterbury District Local Plan.

I ask that this representation is submitted to the Planning Inspector as part of the Regulation 19 examination process.

My objection is made on the basis that Policy HB4 is **unsound** and potentially **not legally compliant**.

In particular, I consider that the proposed allocation is:

Not justified

Not effective

Not consistent with national planning policy

and potentially legally vulnerable because the Council has not demonstrated that it has properly assessed open-space protections, sport and recreation loss, heritage impact, reasonable alternatives, equality and health impacts, Sustainability Appraisal requirements, ecological constraints, access, deliverability, or the evidential basis for any reclassification of the site as brownfield/developable housing land.

The Council's own Sustainability Appraisal / SLAA material appears to acknowledge that the site lies within protected Existing Open Space and that development is unsuitable with regard to existing policies, yet Policy HB4 nevertheless allocates it for housing.

For the reasons set out below, I request that **Policy HB4 is deleted from the Local Plan**.

1. Policy HB4 should be deleted because the site has not been shown to be suitable, available, achievable or deliverable

Policy HB4 should be deleted from the Local Plan because Canterbury City Council has not demonstrated, through robust and proportionate evidence, that the site is **suitable, available, achievable or deliverable** for residential development.

This concern is heightened because Canterbury City Council appears to be acting in a dual capacity as both **landowner/promoter of the site** and **local planning authority**. In those circumstances, the evidence base supporting the allocation should be especially robust, transparent and independently scrutinised.

The Council should demonstrate that the site has been assessed to the same standard that would be expected of any private land promoter. At present, fundamental matters appear unresolved, including:

- heritage impact;
- Conservation Area impact;
- open-space status;
- sport and recreation loss;
- access improvements;
- ecological survey requirements;
- residential amenity;
- viability;
- deliverability;
- and whether the site is genuinely suitable, available and achievable.

These matters go to the principle of allocation and should not simply be deferred to a future planning application.

2. The site is former sport, recreation and open-space land

The Beacon Road site should not be treated as an ordinary housing allocation. It is a former sport and recreation site, historically associated with hockey, tennis and community activity. Its planning history, open-space character and community function are central to any lawful and sound assessment of the site.

National planning policy is clear that existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless an assessment clearly shows that the land is surplus to requirements, equivalent or better replacement provision is made in a suitable location, or the development is for alternative sport/recreational provision whose benefits clearly outweigh the loss.

Policy HB4 does not demonstrate that any of these tests have been met.

The Council has not demonstrated through robust, up-to-date and proportionate evidence that the Beacon Road site is surplus to open-space, sport, recreation, food-growing, health, education, biodiversity, tree-canopy or community infrastructure requirements.

Nor has the Council demonstrated that equivalent or better replacement provision would be secured in a suitable location.

Nor is the proposed residential allocation an alternative sport or recreational use whose benefits clearly outweigh the loss of the site's current or former function.

For this reason, Policy HB4 is not consistent with national planning policy.

3. Policy HB4 itself acknowledges major unresolved constraints

Policy HB4's own wording demonstrates that the site is heavily constrained and that fundamental matters remain unresolved.

The policy requires:

- approximately 20 dwellings;
- open space covering approximately 50% of the site;
- mitigation for the loss of sports facilities;
- a substantial area of open space for new and existing residents;
- heritage assessment relating to the Herne Bay Conservation Area;
- protection of adjacent residents' amenity and privacy;
- development that respects the existing pattern, character and scale of the area;
- and improvement of the existing access from Beacon Road.

These requirements show that the site is not a straightforward housing allocation. They also raise serious questions about whether the proposed housing capacity is realistic, whether the site is deliverable, and whether the principle of development has been properly justified.

The requirement for sports mitigation appears to acknowledge that sports provision would be lost.

The requirement for approximately 50% open space appears to acknowledge the site's continuing open-space value.

The requirement for open space for new and existing residents appears to acknowledge a wider community need.

The requirement for a Heritage Statement confirms that Conservation Area impact is a fundamental issue.

The requirement to improve the Beacon Road access confirms that access is an unresolved constraint.

These matters should not be deferred to a future planning application. They go to the principle of whether the site should be allocated at all. Without robust plan-stage evidence addressing these constraints, Policy HB4 is not justified, not effective and not consistent with national policy.

4. “Appropriate mitigation” for sports loss appears to acknowledge harm

Policy HB4 requires an “appropriate mitigation strategy” for the loss of sports facilities on the site. This appears to acknowledge that the allocation would result in the loss of sport/recreation provision.

That makes the absence of a proper plan-stage assessment more serious.

If the Council accepts that sports provision would be lost, it must demonstrate at plan-making stage how that loss satisfies national policy tests. In particular, the Council must show:

- whether the site is genuinely surplus to sport and recreation requirements;
- whether replacement provision would be made;
- where that replacement provision would be located;
- whether it would be equivalent or better;
- whether it would be accessible to the same community;
- and whether the benefits of residential development clearly outweigh the loss.

The Council has not demonstrated this.

There also appears to be no evidence that the Council actively explored continued sport/recreation use, alternative community recreation use, or another policy-compliant open-space use before advancing the site for housing.

This omission undermines the soundness of Policy HB4.

5. Approximately 50% open space undermines the claim that this is a straightforward brownfield housing site

Policy HB4 requires open space covering approximately 50% of the site.

This is highly significant. It demonstrates that the Council itself recognises the site's open-space function, value or potential.

The Council has not explained why only 50% of the site should be retained as open space, why the whole site should not be protected as open space/community green infrastructure, or how the retained open space would be secured, managed and made accessible to existing residents.

The policy also states that the site should provide a substantial area of open space for **new and existing residents**. This appears to acknowledge that existing residents have a legitimate need for open space on this site.

If existing residents are intended to benefit from open space on the site, the Council should explain why the entire site has not been assessed as a community open-space, recreation, biodiversity, health and food-growing asset.

6. Brownfield classification does not override open-space protection

The Council must not rely on a simplified "brownfield" label to justify residential allocation of this site.

The presence of hardstanding, former courts, fencing, buildings or other infrastructure does not erase the site's function and history as sport/recreation land. Nor does it automatically make the site suitable for residential development.

National planning policy does not treat all previously developed land as automatically suitable for housing. In particular, land in built-up areas such as recreation grounds and allotments is not simply equivalent to ordinary brownfield development land.

Policy HB4 appears to proceed on the assumption that the site is suitable brownfield land. That assumption is not legally or evidentially robust unless the Council can clearly explain why the site's open-space, sport and recreation function has been discounted.

The Council should provide a clear audit trail explaining:

- when and why the site was removed from protected open-space consideration, if it was;
- when and why it was reclassified as brownfield or developable housing land;
- what evidence was relied upon;
- what consultation took place;
- what open-space, sport and recreation assessment was undertaken;
- what equalities and health impacts were assessed;
- what alternatives were considered;
- and why community green infrastructure, food-growing, recreation and health-related uses were rejected.

Without such an audit trail, Policy HB4 is not justified by proportionate evidence.

The Sustainability Appraisal / SLAA evidence appears internally contradictory

The Council's own Sustainability Appraisal / SLAA material appears to acknowledge that SLAA374 is situated within a protected area of Existing Open Space and that development of the site is therefore considered unsuitable with regard to existing policies. It also appears to acknowledge significant and minor negative impacts.

This is a fundamental soundness issue. If the Council's own evidence identifies the site as unsuitable under existing open-space policies, then the Regulation 19 allocation requires a clear, robust and transparent justification explaining why that constraint has been overridden.

It is not sufficient to rely on general statements that mitigation "can" be provided, or that the site is brownfield and within the existing urban area. The Council must demonstrate, through proportionate evidence, that the site is genuinely surplus to open-space and sport/recreation requirements, that equivalent or better replacement provision will be secured, that significant negative impacts have been properly assessed, and that reasonable alternatives have been considered.

The acknowledgement of significant and minor negative impacts also strengthens the need for a proper Sustainability Appraisal of the reasonable alternative of retaining and restoring the site as open space, sport/recreation land, biodiversity habitat, food-growing land and community green infrastructure.

Without that evidence, Policy HB4 is not justified, not effective and not consistent with national policy.

7. The site's degraded condition should not be used as justification for development

The site's present degraded, inaccessible or unmanaged condition should not be treated as evidence that it lacks public value or is surplus to requirements.

If the site has deteriorated because of restricted access, lack of active stewardship, lack of investment or failure to enable community use, that deterioration cannot properly substitute for a robust planning assessment.

The correct planning question is not simply "what condition is the site in now?" but:

What is the site's history?

What is its designation and former use?

What community, health, education and ecological needs exist locally?

Could the site meet those needs?

Have reasonable alternatives to housing been properly assessed?

Would the loss of the site worsen local deficits?

Planning policy should not reward the neglect or under-management of open space by treating deterioration as a reason for housing allocation.

The Council must assess the site's planning value by reference to its history, designation, former use, community function, strategic potential and local deficits — not merely its present degraded condition.

8. The Council has not demonstrated that residential development is the most appropriate strategy

A Local Plan is only sound if it is justified. That means it must be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

Policy HB4 is not justified because the Council has not demonstrated that residential development is the most appropriate strategy for this site when clear, credible and policy-relevant alternatives exist.

Reasonable alternatives include retaining and restoring the site for:

community open space;
allotments and community food growing;
outdoor education;
volunteering and skills development;
youth provision;
health and wellbeing activity;
green social prescribing;
informal recreation;
tree canopy improvement;
biodiversity recovery;
community composting and soil-building;
sports and recreation;
and climate-resilient green infrastructure.

These are not speculative or sentimental alternatives. They are directly aligned with planning objectives relating to health, climate adaptation, biodiversity, food resilience, community facilities, education, recreation and green infrastructure.

In that context, the Council should have assessed Beacon Road not only for housing yield, but also for its potential to meet open-space, health, education, food-growing, biodiversity, tree-canopy and community infrastructure needs over the plan period.

The Council has not shown that this reasonable alternative has been properly assessed.

9. Inadequate Sustainability Appraisal / failure to assess reasonable alternatives

The Sustainability Appraisal is a key legal and evidential part of the Local Plan process. It must properly assess reasonable alternatives and consider social, environmental and economic impacts.

Policy HB4 is legally and evidentially vulnerable if the Sustainability Appraisal has treated the Beacon Road site simply as a housing opportunity without properly appraising the reasonable alternative of retaining and restoring it as community green infrastructure.

Given the site's history as sport/recreation land, its potential open-space status, its location in an area experiencing deprivation and health inequality, its potential for tree canopy improvement, and its suitability for food-growing, education, volunteering, biodiversity and health-related uses, a non-residential community green infrastructure option is plainly a reasonable alternative requiring assessment.

If that alternative has not been properly assessed, the allocation is not justified.

10. The site is understood to be within the Herne Bay Conservation Area

The site is understood to lie within the **Herne Bay Conservation Area**, specifically within area **HB13**, and to have been recognised in the Herne Bay Conservation Area Appraisal as land with historic use as private and public open space.

If that is correct, the allocation has clear heritage implications.

The Council has not demonstrated that the proposed allocation, or the partial loss/termination of the site's historic open-space and recreation function, would preserve or enhance the character or appearance of the Conservation Area.

This issue should not be left to the planning application stage. A Local Plan allocation establishes the principle of development. Therefore, the Council should already have produced or referenced sufficient heritage evidence to show that the site is capable of being developed without unacceptable harm to the Conservation Area.

At minimum, the Council should have prepared or required:

- a Heritage Statement;
- a Design and Planning Statement;
- a site-specific design or development brief;
- transport and access assessment;
- heritage impact assessment;
- assessment of impact on neighbouring Victorian properties;
- and evidence explaining how the historic open-space character of the site would be protected or, if lost, justified.

Without that evidence, Policy HB4 is not justified or effective.

11. Vague wording such as “could be designed” is not enough for a Local Plan allocation

The evidence base appears to rely on uncertain or speculative language, including that development **could** be sympathetically designed, **could** preserve the Conservation Area, or **could** avoid unacceptable impacts on residential amenity.

That is insufficient at Regulation 19 stage.

The Council must demonstrate that the site **can** be delivered acceptably, not merely that it might possibly be capable of acceptable design at a later stage.

If the acceptability of development depends on unresolved design, heritage, access, ecology or amenity matters, those matters should be resolved before the site is allocated.

This is particularly important because any identified constraints could affect the site capacity, density, housing numbers, open-space requirement, viability and deliverability.

The Council has not demonstrated how the proposed housing numbers have been arrived at, given these unresolved constraints.

Policy HB4 uses vague wording in reference to Open Space and does not provide sufficient certainty

Policy HB4 relies on vague and imprecise wording in relation to key matters that go directly to the soundness and deliverability of the allocation.

The policy refers to open space covering “**approximately 50%**” of the site and to the provision of a “**substantial area of open space**” for new and existing residents. These phrases do not provide sufficient certainty. They do not define how much land would be protected, where it would be located, whether it would be genuinely publicly accessible, how it would be managed, who would own or maintain it, or how it would be secured in perpetuity.

Similarly, the policy refers to an “**appropriate mitigation strategy**” for the loss of sports facilities, but does not define what mitigation would be required, where replacement provision would be located, whether it would be equivalent or better, whether it would serve the same community, or how it would meet national policy tests for loss of sport and recreation land.

The policy also requires the existing access from Beacon Road to be “improved”, but does not specify what improvement is required, whether it is technically achievable, or what impacts it may have on neighbouring residents, highway safety, heritage, trees, ecology or the Conservation Area.

This level of uncertainty is not appropriate for a Regulation 19 site allocation. These are not minor details to be resolved later; they are fundamental matters that affect whether the site is suitable, achievable, deliverable and consistent with national policy.

Without clearer wording and supporting evidence, Policy HB4 does not provide sufficient certainty and is therefore not justified or effective.

12. Undefined access improvements go to deliverability

Policy HB4 refers to the need to improve the existing access from Beacon Road. However, the Council has not clearly defined:

- what improvements are required;
- whether they are technically achievable;
- whether they would affect neighbouring residential amenity;
- whether they would harm the Conservation Area;
- whether they would require land outside the site;
- whether they would affect trees, habitat or open space;
- or whether they would affect the viability or capacity of the site.

Access is not a minor detail. It goes directly to whether the site is suitable and deliverable.

The indicative concept masterplan appears to show a constrained access route entering the site between existing residential properties. This raises unresolved questions about highway safety, residential amenity, construction impacts, emergency access, refuse access and deliverability.

It is not sound to allocate the site for housing while leaving such a fundamental matter unresolved.

13. Lack of ecological survey and biodiversity evidence

The site is understood to have become overgrown and may now support a thriving wild environment and habitat. In those circumstances, the Council should not assume that the site is “not particularly sensitive” for biodiversity without evidence.

A site-specific ecological survey should have informed the allocation, particularly where the site may now support established habitat, protected species, nesting birds, reptiles, invertebrates, or habitat requiring avoidance, mitigation, compensation or translocation.

The Council should explain:

- whether an ecological survey has been undertaken;
- when it was undertaken;
- what habitats and species were identified;
- whether protected species were considered;
- whether Biodiversity Net Gain is achievable on site;

whether habitat loss has been assessed;
and how the allocation aligns with the Council's biodiversity objectives.

Without this evidence, the allocation is not justified.

14. Heron Ward deprivation and health inequality are material planning considerations

The site sits within the wider Herne Bay urban area, where there are recognised pressures relating to deprivation, health inequality, access to green infrastructure, youth provision, food-growing opportunities, community facilities and preventative health infrastructure.

In this context, the loss of a rare enclosed open-space/recreation site has heightened planning significance.

The planning balance should give significant weight to accessible green space, outdoor recreation, volunteering, food growing, education, tree canopy, biodiversity and social infrastructure. These are not optional extras; they are preventative health assets.

The Council has not demonstrated that the proposed allocation addresses these local needs. Nor has it demonstrated that the loss of the site would not worsen existing inequalities in access to green space, community provision, food-growing opportunities and health-supporting infrastructure.

Heron Ward's position in relation to deprivation should have triggered a careful assessment of whether this site could contribute to local health, wellbeing, education, food resilience, community cohesion and volunteering infrastructure before being allocated for housing.

15. Public Sector Equality Duty and health impact concerns

The Council should demonstrate that it has complied with the Public Sector Equality Duty in relation to Policy HB4.

This is particularly important because the loss of local open space, recreation land and potential community infrastructure may disproportionately affect groups more likely to rely on free, local and accessible provision, including children, young people, older people, disabled people, carers, people on low incomes and those experiencing health inequality.

The Council should therefore show how it assessed the equality and health impacts of losing the Beacon Road site as a potential community open space, recreation, volunteering, food-growing and health-supporting green infrastructure asset.

If no site-specific equalities or health impact assessment has been undertaken, the allocation is vulnerable on legal compliance and soundness grounds.

16. Failure to assess allotment, food-growing and community growing need

The Council has not demonstrated that it has assessed whether Beacon Road could meet existing or future demand for allotments, community food growing or productive open-space uses.

This is a material omission.

In an area with limited access to food-growing facilities, the site should have been assessed as a potential community food-growing, allotment or productive open-space asset before being allocated for housing.

There is historical and policy precedent for treating allotments and food-growing land as important community infrastructure and a form of open space. Food-growing spaces contribute to health, education, community resilience, local food security, volunteering, outdoor activity and social connection.

Given the wider context of rising food insecurity, public health pressures and climate instability, the Council should be actively identifying suitable community food-growing land, not disposing of rare enclosed open-space sites without first assessing their productive community potential.

The Council has not demonstrated that this assessment has taken place.

17. Failure to account for tree canopy, biodiversity and climate adaptation

The site offers a rare opportunity to address urban tree canopy, biodiversity and climate adaptation deficits.

Herne Bay, and particularly areas such as Heron Ward, should not lose potential green infrastructure sites without a clear assessment of local tree canopy need, biodiversity opportunity and climate resilience.

Allocating a site capable of meaningful tree planting, habitat creation, biodiversity recovery and climate adaptation for housing is not justified unless the Council can show that these alternative benefits were properly assessed and outweighed by the need for housing on this specific site.

The Council has not demonstrated that it has undertaken that site-specific balancing exercise.

18. The indicative concept masterplan raises unresolved questions

The indicative concept masterplan for Policy HB4 appears to show a substantial part of the site retained as open space/biodiversity opportunity. It also identifies the site's historic sport/recreation uses, including Herne Bay Hockey Club and Herne Bay Tennis Club.

This undermines any simplified treatment of the site as ordinary brownfield housing land.

The plan also shows the site enclosed by existing residential properties and gardens, with access apparently entering from Beacon Road through a constrained route between existing homes.

The Council has not explained:

- why the development area has been selected;
- why only part of the site is proposed for development;
- why the whole site should not be retained for open space, biodiversity, recreation, food growing, health and community infrastructure;
- how the retained open space would function;
- whether the open space would be publicly accessible;
- who would manage it;
- how sports/recreation loss would be mitigated;
- how biodiversity would be protected or enhanced;
- how tree canopy would be improved;
- how existing residents would benefit;
- and how access would be delivered without unacceptable harm.

Without this explanation, the concept masterplan does not provide adequate justification for the allocation.

19. The allocation is not effective or clearly deliverable

Policy HB4 is also unsound because the Council has not demonstrated that the site is genuinely deliverable without unacceptable harm.

The site appears constrained by:

its surrounding residential context;
Victorian neighbouring properties;
access limitations;
Conservation Area status;
former sport/recreation use;
potential open-space status;
drainage implications;
residential amenity impacts;
biodiversity potential;
need for bespoke design;
possible requirement for replacement sports provision;
and viability uncertainty.

A Local Plan allocation must be effective. It must be deliverable over the plan period.

Policy HB4 should not proceed unless the Council can demonstrate, through robust technical evidence, that residential development can be delivered lawfully and without unacceptable harm to neighbouring residents, the Conservation Area, open-space provision, recreation need, biodiversity, drainage, trees, community infrastructure and health-supporting green infrastructure.

20. No developer identified and viability/deliverability not demonstrated

The Council has not demonstrated that the site is available and achievable in practical terms.

No developer appears to have been identified. The site would require a bespoke design response because of its Conservation Area location, surrounding residential context, access constraints, open-space requirements, sports mitigation and likely need for high-quality design.

The Council has not demonstrated that the proposed housing numbers are viable or deliverable once these constraints are properly taken into account.

If the deliverability of the site depends on unresolved future design work, undefined access improvements, heritage mitigation, ecology mitigation, sports mitigation, open-space provision and viability testing, then the site has not been adequately promoted or evidenced for allocation.

Policy HB4 is therefore not effective.

21. Housing yield does not justify permanent loss of community green infrastructure

The proposed housing yield appears modest when weighed against the permanent loss of a rare open-space and former recreation site.

The removal of Policy HB4 from the Local Plan would not undermine the overall housing strategy of the district, given the small number of dwellings proposed. The limited housing contribution does not justify the unresolved policy conflicts, open-space loss, sports provision loss, heritage risk, access uncertainty, biodiversity uncertainty and community infrastructure harm.

The Local Plan must plan for housing, but it must also plan for healthy communities, green infrastructure, biodiversity, climate resilience, recreation and community facilities.

Housing need alone does not automatically justify the loss of protected or potentially protected open space.

22. The site should be considered as community infrastructure, not only as land supply

Beacon Road has the potential to become a significant community green infrastructure asset for Herne Bay.

Potential community-led uses include:

- community open space;
- allotments;
- community food growing;
- urban orchard;
- youth education;
- outdoor learning;
- wildlife habitat;

pollinator planting;
tree canopy enhancement;
community composting;
soil-building;
green social prescribing;
volunteering;
informal recreation;
and health and wellbeing provision.

These uses would directly respond to local need in Heron Ward and the wider Herne Bay area. They would also support broader planning objectives around health, climate resilience, biodiversity recovery, community cohesion, education, food resilience and access to nature.

The Council has not demonstrated why this alternative future has been rejected.

Requested modification

I request that the Planning Inspector finds Policy HB4 unsound and requires the following modification:

Delete Policy HB4 – Land at Beacon Road from the residential allocations in the Draft Canterbury District Local Plan.

The site should instead be protected as existing open space, former sport/recreation land and community green infrastructure.

It should be assessed for community-led uses including:

open space;
informal recreation;
food growing;
allotments;
tree planting;
biodiversity recovery;
outdoor education;
volunteering;
green social prescribing;
community health and wellbeing;
sports and recreation;
community composting;
soil-building;
and climate-resilient green infrastructure.

At minimum, Policy HB4 should not proceed unless the Council provides:

1. A robust and up-to-date open space, sport and recreation assessment demonstrating that the site is genuinely surplus to requirements.
2. Evidence that equivalent or better replacement sport/recreation provision would be made in a suitable location.
3. A full Sustainability Appraisal of reasonable alternatives, including retention and restoration as community green infrastructure.
4. A clear audit trail explaining any removal from protected open-space status or reclassification as brownfield/developable housing land.
5. A site-specific equality and health impact assessment.
6. Assessment of allotment, food-growing, outdoor education, volunteering and community infrastructure need.
7. Assessment of the site's potential contribution to tree canopy, biodiversity recovery and climate adaptation.
8. A site-specific ecological survey.
9. A heritage assessment and/or development brief demonstrating that the allocation can preserve or enhance the Herne Bay Conservation Area.
10. Technical evidence on access, drainage, residential amenity, construction impacts and deliverability.
11. Evidence that the site is suitable, available and achievable.
12. A clear explanation of why the benefits of residential development would outweigh the loss of this site's open-space, sport/recreation, heritage and community green infrastructure potential.
13. A clear explanation of how the figure of approximately 20 dwellings has been calculated given the requirement for approximately 50% open space, sports mitigation, heritage protection, access improvements, biodiversity constraints and neighbouring amenity protection.
14. A precise definition of what is meant by "approximately 50%" open space and "substantial" open space, including the exact area, location, ownership, access arrangements, management responsibility, public accessibility and long-term protection mechanism.
15. A clear explanation of how the "substantial area of open space" would be secured, whether it would be publicly accessible, whether it would serve existing residents, who would manage it, and how it would be protected in perpetuity.
16. A clear mitigation strategy for the loss of sports facilities, including whether equivalent or better replacement provision would be provided in a suitable location.
17. A clear explanation of the indicative concept masterplan, including why the development area has been selected, how the retained open space/biodiversity area would be secured, whether it would be publicly accessible, who would manage it, and how the proposed access would be delivered without unacceptable harm to neighbouring residents or the Conservation Area.

For the reasons set out above, Policy HB4 is not justified, not effective, not consistent with national policy and potentially not legally compliant.

I therefore object to the allocation and request that it is removed from the Local Plan.

Yours faithfully,

Lucy Platel

[Redacted signature block]

18th May 2026