

By email to [consultations@canterbury.gov.uk](mailto:consultations@canterbury.gov.uk).  
c.c. Victoria Asimaki, Principal Policy Officer (Engagement)

## **Canterbury District Local Plan to 2040**

### **Westbere Parish Council consultation response**

**31 May 2024**

The parish council has the following comments/concerns in no particular order:

#### **1. Rural Service Centres / Local Service Centre designations**

##### **Westbere classified as a Local Service Centre**

The Canterbury District Local Plan Development Topic Paper (February 2024) points 3.14, 3.15 and 3.16. identifies Westbere amongst others as a “Local Service Centre” where these settlements are said to “provide a more limited range of services and facilities than rural service centres. Westbere Parish Council feel that Westbere should be classified as a Hamlet as described in point 3.17 – where there are either no services or very limited services – and its rural character should be protected. Westbere has no shops and its only facility is The Yew Tree Public house. Therefore, Westbere Parish Council cannot understand how its tiny village could be classified as a Local Service Centre.

Westbere Parish Council considers itself similar to Fordwich which is classified as a Hamlet, both in terms of population and facilities, and a Church with only one service a month.

##### **R1 – Rural service centres - Hersden is classified as a rural centre.**

Westbere Parish Council considers that Hersden ought to be designated as a Local Service Centre as it has just one shop, one community centre and one church. As a result the proposed allocation of land for housing development will stress the amenities of Hersden which cannot support such large scale developments.

#### **2. The Bread and Cheese Field – Policy R5**

The Bread and Cheese site whilst currently in Hersden parish (SLAA163 and now Policy R5) is a strategic site for 150 homes.

The development of this site would remove any distinction between the settlements of Westbere and Hersden and have the cumulative effect of joining Westbere to the ribbon developments along the A28 at Hoplands and Chislet Colliery, thereby damaging the integrity of Westbere and Hersden as separate communities.

Westbere Parish Council remains opposed to its development and its inclusion in the Local Plan as a strategic site, and urges Canterbury City Council to remove it.

Furthermore, Local Service Centre growth has to be proportionate – growth for Westbere should therefore be circa 10 units – should the Bread and Cheese Field be returned to Westbere Parish under the current parish boundary governance review being conducted, development of the field Policy R5 would become contrary.

#### **3. The CCC Settlement boundaries**

An extract from Section 5 in the CCC Development Topic Paper re Settlement boundaries has section 5.4 stating that “settlement boundaries have been largely traced along the outside of roads and property curtilage boundaries, to be in line with the existing form of the settlements”.

*However, 19 of the existing Westbere Bushy Hill Road homes have been excluded from the settlement boundary of Westbere.*

This is seen by some residents in this area as a direct manipulation to allow development of the Bread and Cheese Field by excluding them.

No-one wants Hersden and Westbere to merge so it is wrong to take out the Bushy Hill Road homes.

Both the parish council and residents in this area feel the lines drawn are wrong and they do not agree with the settlement boundaries as they currently stand.

Section 5.6 of the CCC paper re Settlement boundaries states that “Agricultural... land has not been included in the settlement boundary...as deemed as countryside.” – so the Bread and Cheese Field should not therefore be included in the settlement boundary, as it currently does for Hersden.

For the green gap proposal in the Canterbury District Local Plan - the parish council is supportive of CCC’s proposal for Headley’s Field (the one opposite the Bread and Cheese Field and wholly in Westbere) - to be green gap as per the current draft of the plan, based on the current Settlement boundaries.

Some residents and the parish council object to, and do not agree with, the settlement boundaries as they currently exist - they want to request that CCC

- i) move the Hersden settlement boundary back beyond the Bread and Cheese Field (as per Section 5.6 of the CCC paper re Settlement boundaries as it is agricultural land), and
- ii) move Westbere settlement boundary to include Bushy Hill Road but to exclude Headley’s Field outside of the settlement too (to protect it from development and support the current draft plan for this Headley’s Field to be a green gap).
- iii) The subsequent addition of the Bread and Cheese Field to also be allocated as a Green Gap – in addition to that of Headley’s Field. Westbere Parish Council do not support development of the Bread and Cheese field. The Bread and Cheese Field is currently the land between Westbere and Hersden but is the subject of a Community Governance Review and should therefore be an additional Green Gap if returned to Westbere or not.

#### **4. Green gaps**

##### **4.1 Green gap between Westbere and Hersden**

The Natural Environment and Open Spaces Paper revised February 2024 again has on pages 86-88 a proposed green gap between Westbere and Hersden (this was previously on pages 67-69 of the previous Paper of October 2022) and proposes no changes to this new green gap between Westbere and Hersden.

This is actually within the parish boundary of Westbere.

Westbere Parish Council fully supported this green gap in its CDLP response in January 2023 especially in light of housing development of circa 150 new homes proposed for the Bread and Cheese field (Policy R5) opposite.

It is important to retain this proposed green gap field to protect the lower village of Westbere to prevent flooding, as there is such a steep slope down towards the existing homes, including important listed buildings, some without foundations, in Westbere Lane.

Westbere Parish Council wholly supports this green gap again – not just in terms of retaining it as a green gap and preventing ‘whole ribbon’ development – but because development of it could have serious implications for the village of Westbere –

The village of Westbere is geographically south of the A28 between Sturry and Hersden. It is accessed by three steep lanes (Westbere Lane, Church Lane and Bushy Hill Road) all of which lead down into the centre of the village where the Yew Tree Pub is situated.

The village is a designated Conservation Area.

It is home to fourteen Listed Buildings (eleven in Westbere Lane, including the Yew Tree, two at the entrance to Walnut Tree Lane at the junction of Westbere Lane and Bushy Hill Road and one in Bushy Hill

Road) – none of these buildings have what is considered to be appropriate foundations by 2020 standards. They were built between 1400 and 1900 approximately.

In wet weather the rain from the A28 runs down into the village and, therefore, the lanes are permanently wet.

Westbere Lane is very vulnerable to increased and problematic water run-off from the A28 along with the mud it carries. This mud along with washed down leaf debris repeatedly leads to blocked drains.

The result is fast-flowing water through the culverts and excess water in the narrow lanes – unsuitable permanent conditions for buildings without foundations or, alternatively, the main railway line from Thanet to London, which lies below and to the south of Westbere Lane, with similar problems.

Climate Change, including the heavy, excessive and continuing 2019/2020 winter rain-fall, has further exaggerated these problems.

Headley’s field on the A28 is often under water.

Any further development south of the A28 will consolidate these problems and the village’s historic listed buildings need protection from an escalating problem.

#### **4.2 Green gap - Retention of the green gap between Sturry and Westbere**

To prevent coalescence, Westbere Parish Council also supports the existing green gap (known as The Two Fields) between Sturry and Westbere (Page 20 of The Natural Environment and Open Spaces Paper (February 2024) and is pleased to see its continued inclusion. An existing green gap designation gives it significant protection against any planning application.

#### **4.3 Other green gaps**

Westbere Parish Council also supports the proposed green gap between Sturry and Hersden (Page 22 of The Natural Environment and Open Spaces Paper (February 2024) and is pleased to see its continued inclusion.

Westbere Parish Council also supports the Sturry and Broad Oak green gap – now proposed to be extended along Popes Lane.

Westbere Parish Council also believes that the land to the north of Westbere Lane, to the east of the convent along the A28, should be a designated Green Gap as there is already housing in Sturry opposite this area.

### **5 Lengthening of the Sturry train station platforms**

The level crossing at Sturry is closed for 17 minutes in every hour. The regular traffic congestion frequently backs up for over a mile from the crossing. The level crossing ‘down time’ is made worse as the Sturry station platforms are too short, causing any train of more than four carriages to experience “train overhang”, so the barriers cannot be raised. The arrangement of the platforms is such that both up trains and down trains overlap the crossing.

This issue is only going to get worse because of the current, emerging and planned housing developments for more than 2,500 homes at Sturry, Broad Oak and Hersden, and further afield at Herne and Greenhill.

Lengthening the platforms at Sturry will give immediate and long-lasting benefit to a great deal of residents and road users, not just in the local area but from the wider towns around. It would be better for the environment, climate change and air quality.

So, we are delighted and fully support Platform widening of Sturry Train Station to avoid overhanging the level crossing and therefore reduce barrier downtime: relevant references are:

- Page 14 of the Transport Strategy
- Para 9.32 in the Draft Infrastructure Delivery Plan (February 2024) and Schedule B Page 36 in the same document showing a ‘medium term’ timeframe for delivery.

The Draft Infrastructure Delivery Plan (February 2024) gives an indicative cost of £5m – this is an updated figure provided by Network Rail - and that the funding mechanism will be CIL

funding. Westbere Parish Council would like Canterbury City Council to rank this as a priority in its CIL Priority List, if possible, please.

## **6 Insufficient Foul drainage capacity**

The parish council has concerns about infrastructure as a whole to support the development planned in the Canterbury District Local Plan and in particular the capacity (or lack of it) in the foul drainage network.

Southern Water only review requirements after a permission is in place, and have a five-year programme of work.

A Grampian condition, to phase builds to align with available Foul drainage capacity, *must* be imposed on *all* outline planning permissions, in order to phase occupancy of development to align with the delivery by Southern Water of any sewerage network reinforced required to serve that development.

## **7 Policy R17 – 440ha Broad Oak reservoir and Country Park**

The parish council supports this. We understand this is still a priority for South East Water which should be on track to deliver this in the early 2030's.

Planning for sufficient fresh water supply is essential, based on current grow plans alone.

## **8 Policies supported in general - Vision and Strategic Objectives for the District**

Westbere Parish Council supports the following policy statements:

SS1 - Environmental Strategy

SS2 - Sustainable design

C20 - Land south of Sturry Road

R17 – Broad Oak Reservoir

R19 – Countryside

DS4 – Rural housing

DS5 – Specialist housing provision

DS6 – Sustainable design

DS7 – Infrastructure delivery

DS9 – Education and associated development

DS11 – Tourism (in particular s. 2)

DS12 – Rural economy (in particular s. 3)

DS15 – Highways and parking

DS16 – Air quality

DS17 - Habitats of international importance

DS18 – Habitats and landscape of national importance

DS20 – Flood risk and sustainable drainage

DS21 – Supporting biodiversity recovery

DS22 – Landscape character

DS23 – The Blean Woodland Complex

DS24 – Publicly accessible open space and sports

DS26 - Historic environment and archaeology

DM1 – conversion of existing rural buildings

DM4 – Reducing waste

DM5 – Parking design

DM6 – Extensions and alterations

DM7 – Health and crime impact assessments

DM8 – Shopfronts

DM9 – Advertisement

DM11 – Residential design

DM14 – Flood risk

DM15 – Sustainable drainage

DM16 – Water pollution

DM17 – Noise, odour and dust pollution

DM18 – Light pollution and dark skies

Westbere Parish Council supports the following policies, but does not believe that they are deliverable, since there is no information on costing or funding for them

SS4 - Movement and transportation

SS5 – Infrastructure

DS13 – Movement hierarchy

DS14 – Active and sustainable travel

## **9 Policies not supported:**

### **Policy C18 – Land east of Shelford Landfill**

Westbere Parish Council opposes this. This development places excess pressure of heavy goods vehicle traffic on to Broad Oak Road and the surrounding streets and access routes with no indication of an upgrade to either the road system or the rail crossing nearby. This is potentially dangerous, and the roads are already in a seriously degraded condition due to traffic to the landfill site.

## **10 A collective Masterplan to enhance roads, walking and cycling routes, and bus services**

There are several small development proposals:

R5 – Bread and Cheese Field. 150 dwellings.

R6 - Land at Hersden: 18 dwellings which will add yet another point of access to the A28 in less than 400 metres..

R9 – Land at Popes Lane: 110 dwellings which will overload adjoining roads and junctions, especially those at Hawe Lane / Babs Oak Hill, the junctions at Fox Lane, Sweechgate and Herne Bay Road, and at Popes Lane / Herne Bay Road. With development currently under construction on Herne Bay Road the likely impacts are significant. Popes Lane is already too narrow for traffic flows at peak times, and Hawe Lane is rapidly deteriorating.

R10 – Land at the Paddocks 50 dwellings: This will add more traffic onto Broad Oak Road and Sweechgate and the associated junctions which are already overloaded.

R14, R15, R16 (all Broad Oak) 46 dwellings and significant commercial / business space. Again, this will add more traffic onto Broad Oak Road and Sweechgate and the associated junctions which are already overloaded.

Taken together with the carried forward policies from 2017, allocations for development in the Hersden / Westbere / Broad oak and Sturry area total 2628 new dwellings. This is a significant collective impact on the area and in particular on the transport network. Rather than sites around these villages being considered piecemeal, for the purpose of amenities and transport they should be considered as a whole with an overriding masterplan and enhancements to roads, cycling and walking routes, as well as enhancements to bus services, which address the total impact. It is vital to ensure that the collective impact on infrastructure is considered and that opportunities to enhance (for example) walking and cycling routes across the area are maximised and delivered.

## **11 Housing Numbers being planned for**

Westbere Parish Council is concerned about the impact of the decision to build 1149 homes per year which will have a significant negative impact on Westbere, Sturry, Hersden and Broad Oak with wholly inadequate mitigations proposed which are not guaranteed to be delivered.

The parish council broadly supports some of the district's organisations call (such as from ACRA - The Alliance of Canterbury Residents' Associations) that housing number targets being planned for are flawed for a number of reasons:

- Population growth has been consistently and grossly over estimated – the 2021 ONS census data shows the population to be 156,631. That is LOWER than the 2014 base figure. It follows that forecasts using the 2014 base assumptions are fundamentally flawed and cannot be relied on as a basis for calculating housing needs. Nonetheless, population growth estimates underpinning the requirements for the Local Plan have been based on the 2014 figure and thus continue to be wrong by a significant margin. And because the 'Standard Methodology' provides no option to correct the 2014 base figure for the 2021 census it continues to amplify the flaws evident in the 2014 base.
- The current build rate has been lower than targeted over the last decade.