

Canterbury District Local Plan 2040: Regulation 19 Representation

Representation By: Westbere Village Preservation Society

Policy / Site Reference: Policy R6 – Bread and Cheese Field (SLAA163)

Settlements: Westbere and Hersden

Part 1 — Introduction and Basis of Objection

1. Introduction

The Westbere Village Preservation Society (WVPS) objects to the draft Canterbury District Local Plan 2040 insofar as it relates to:

- **Policy R6 – Bread and Cheese Field (SLAA163)**
- The **Settlement Boundaries of Westbere and Hersden**

It is the position of the WVPS that the Local Plan, as currently drafted, **fails to meet the tests of Soundness and Legal Compliance as set out in the National Policy Framework (NPFF)**, on the grounds that it is:

- Not **Justified**
- Not **Effective**
- Not **Consistent with National Policy**
- Potentially **Not Legally Compliant**

Despite extensive representations made during earlier consultation stages, the March 2026 Local Plan continues to:

- Allocate the **Bread and Cheese Field (R6)** for development
- Define settlement boundaries in a manner that is inconsistent with published evidence
- Remove previously established safeguards preventing settlement coalescence

If implemented, these proposals would have **permanent and damaging consequences** for:

- The **rural identity of Westbere**
- The **separation between Westbere and Hersden**
- The **integrity of the spatial strategy**

2. Summary of Principal Objections

This representation will demonstrate that:

1. The inclusion of **Policy R6** is not supported by consistent or reliable evidence.
2. The current **Westbere Settlement Boundary** is incorrectly defined and excludes established residential development along **Bushy Hill Road** without adequate planning justification.
3. The removal of safeguards preventing **coalescence between Westbere and Hersden** represents a significant and unjustified policy change.
4. Inconsistencies across multiple Canterbury Council (CCC) documents, including changes of material relevancy, that prevented residents from making fully informed responses throughout the development of the draft Plan.
5. The cumulative effect of these issues results in a Local Plan that is **not justified, not effective**, and potentially **not legally compliant**.

3. Compliance with the National Planning Policy Framework

Under **Paragraph 35 of the NPPF**, Local Plans must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

WVPS submits that the Local Plan fails the **Justified** test because the strategy is not based on proportionate evidence and reasonable alternatives have not been adequately considered.

Further, the Plan raises concerns under:

- **Paragraph 16(c):** Requirement for policies to be underpinned by relevant and proportionate evidence
- **Paragraph 16(d):** Requirement for plans to include effective monitoring and justification

4. Objective of This Representation

The objective of this representation is to demonstrate that:

- Policy R6 is unsound
- The current settlement boundary configuration is unjustified
- The Bread and Cheese Field should instead function as a **Green Gap**
- Settlement boundaries must be amended to reflect established development patterns

Part 2 – Evidence of Procedural and Evidential Inconsistencies

5. Community Governance Review (2017–2018)

During the Community Governance Review undertaken between **July 2017 and July 2018**, Canterbury City Council consulted on proposals relating to parish boundaries between Westbere and Hersden.

During the **January–March 2018 consultation**, residents were presented with mapping (Fig.1 below) that showed the proposed boundary between the two Parishes:

1. Running along the edge of ancient woodland
2. Continuing in a straight line across the field
3. Retaining a substantial portion of the field within Westbere which, significantly, included the original and historic two-acre Bread and Cheese field

This mapping provided reassurance to residents that:

1. The historic Bread and Cheese Field would remain within Westbere
2. The larger field would remain rural in character
3. The physical separation between settlements would be preserved

Option 1 - create a new Hersden Parish Council



Fig. 1 (arrow added)

NOTE: At this time, **formal settlement boundaries did not exist**, but the location of parish boundaries was nonetheless significant in shaping future spatial strategy decisions.

6. Amendment to Parish Boundary Mapping Without Further Consultation (July 2018)

Following consultation, the final proposals approved by Full Council in **July 2018** included a revised boundary map. (Fig 2).

This revised map:

1. Differed materially from the map previously circulated during consultation
2. Altered the previously consulted boundary alignment without any further public consultation
3. Included the entire Bread and Cheese Field within the newly created Hersden Parish

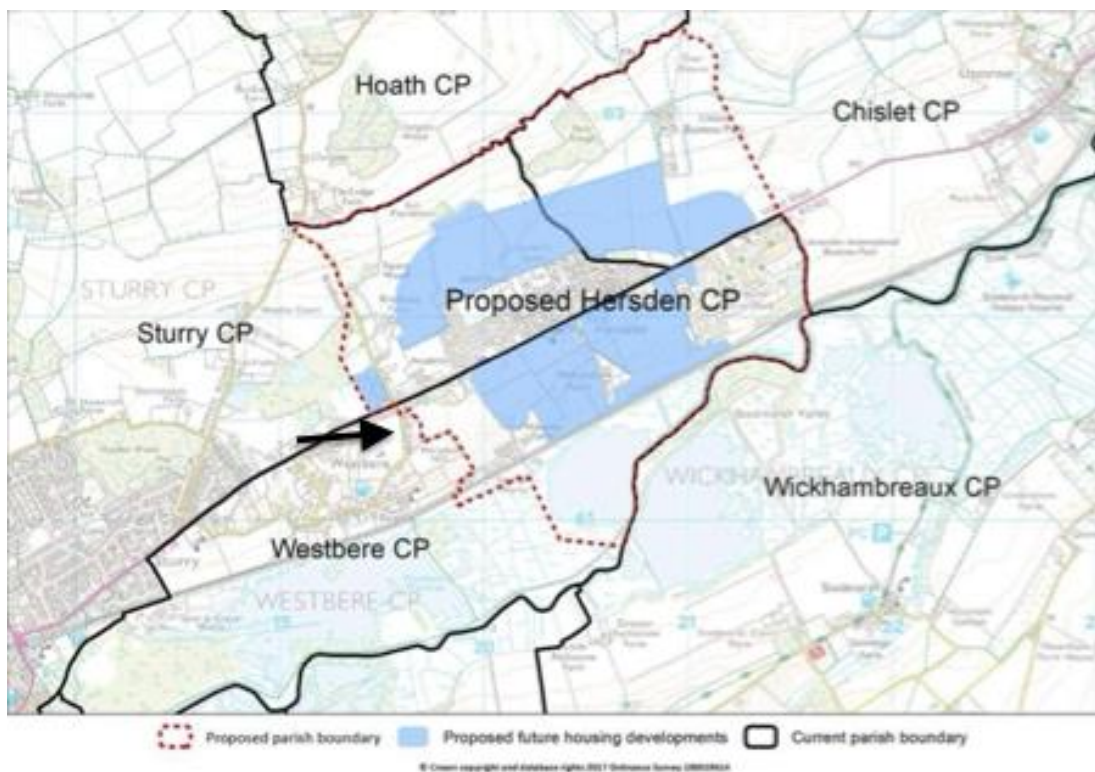


Fig. 2 (Arrow added)

WVPS submits that:

1. This constituted a change of material relevancy to the consultation proposal
2. By moving the Field from a Local Service Centre to a Rural Service Centre it materially affected the future planning context of the site

3. The decision to include all the Field within Hersden established a planning narrative that later under-pinned the Local Plan R6 Policy; it was however, a decision that was fundamentally flawed and which was eventually reversed by Canterbury Council but which would continue to guide the Policy.

This represents an early example of **procedural inconsistency** and possibly **legal compliance** affecting the evolution of Policy R6.

7. Creation of Hersden Parish (2019)

Hersden Parish was formally established in **May 2019**.

At the time of its creation:

1. The Bread and Cheese Field remained agricultural land
2. The site had **not yet** been assessed for development
3. No Strategic Land Availability Assessment (SLAA) had been undertaken for the site

This is significant because later CCC internal documentation stated that the boundary change occurred to incorporate a development site that did not yet exist. (9. Below refers)

8. Call for Sites and Identification of Development Potential (2020–2022)

Between **February and June 2020**, Canterbury City Council undertook a Call for Sites process.

The Bread and Cheese Field was submitted as **Site SLAA163**.

Subsequent SLAA publications in **2022**, and later updates in 2025 and 2026, described the site as:

Adjacent to a small row of houses on Bushy Hill Road which form **part of the Westbere settlement**.

The following link takes you to a downloadable spreadsheet. NOTE: We have used the 2025 version as an example, but the same wording exists in all three 2022, 2025 and 2026 versions. The full statement can be seen under SLAA163, column AP.

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90367>

This description is of critical importance because:

1. It explicitly identifies Bushy Hill Road as part of the Westbere settlement
2. The statement remained consistent across all three SLAA publications (2022, 2025 and 2026)
3. It contradicts the settlement boundary subsequently proposed in later Local Plan drafts

WVPS submits that this inconsistency:

1. undermines the reliability of the spatial strategy.
2. Demonstrates the contradictory nature of critical evidence that has been provided to Westbere residents

9. Local Plan Review and Strategic Changes (2022–2023) Appendix 1 also refers

Following changes in local government leadership in **October 2022**, Canterbury City Council initiated a comprehensive review of the Local Plan.

In September 2023, following an information request from the Review Chairperson, a senior officer referenced the 2017/18 Community Governance Review and stated that:

‘The working group then considered the feedback on all three options and decided to incorporate the site into Hersden PC **so that all of the new development sites fell under a single parish.**’ (Our highlighting. Full text is shown in appendix 1)

WVPS submits that this statement was factually incorrect as at the time of the 2018 boundary decision **no** development allocation existed for the Bread and Cheese Field

Even if unintended, this error:

1. Introduced an incorrect planning narrative that included the Bread and Cheese Field as a development site
2. Created retrospective justification for the inclusion of the Bread and Cheese Field in the Hersden Parish which was based on a development site that did not exist at that time.
3. Raises further concerns regarding **evidence reliability.**

10. Campaign to return the Bread and Cheese Field to Westbere Parish (2023–2024)

The deeply felt loss of the historic Field to Westbere’s heritage led to a residents’ campaign, originating in 2023, to return the Bread and Cheese Field to the Parish.

In **2024**, Canterbury Full Council approved changes restoring the Field to Westbere Parish.

This decision demonstrates:

1. The strength of community commitment towards protecting its heritage
2. The recognition that earlier decisions were fundamentally unsound and had unintended and profoundly damaging consequences as a result of subsequent Local Plan decisions
3. The continuing relevance of the field to Westbere's spatial identity

11. Publication of Draft Local Plan (April 2024)

The April 2024 draft Local Plan introduced a revised **Westbere Settlement Boundary**. (Fig 3.) The added arrow points to the section of Bushy Hill Rd that was removed from the Westbere Settlement.



Fig 3.

Ref:<https://experience.arcgis.com/experience/1e8c61757821421e8dc7d1eab938ed98/?draft=true>

This revision:

1. Removed the majority of Bushy Hill Road from the settlement
2. Reclassified the excluded properties as countryside
3. Retained the land intended for development under Policy R6, as part of the Hersden Settlement

Historic evidence demonstrates that:

1. Residential development along Bushy Hill Road dates back to at least the early 19th century
2. The area has evolved as a continuous residential frontage
3. The road historically functioned as an integral part of the Westbere settlement as it provided the only access to the Church's cottage for the poor of Westbere and the villagers allotments in the Bread and Cheese Field .

WVPS submits that this boundary change:

1. Is not supported by consistent planning evidence
2. Conflicts with the SLAA classification of the same area
3. Represents an unjustified departure from established settlement form

12. FOI Evidence and Lack of Supporting Records (2025)

Appendix 2 refers

Freedom of Information correspondence initiated in October 2025 confirmed that:

1. Settlement boundaries were initially drawn using digital mapping and satellite imagery
2. A site visit was later undertaken in August 2024
3. No formal transcript or recorded assessment exists for that site visit

WVPS submits that:

1. The absence of recorded evidence undermines transparency
2. Planning decisions affecting settlement boundaries should be fully documented
3. Reliance on undocumented observations does not constitute proportionate evidence

Justifications provided during correspondence included references to:

1. A perceived "rural feel"
2. Absence of footpaths
3. Larger plot sizes

However, these characteristics:

1. Are common across Westbere
2. Do not distinguish Bushy Hill Road from other parts of the settlement
3. Do not justify exclusion from the settlement boundary

Part 3 – Landscape Impact, Coalescence Risk and Policy Conflict

13. Landscape Character and Settlement Separation

Independent landscape guidance prepared for Canterbury City Council has consistently emphasised the importance of maintaining separation between Westbere and surrounding settlements.

The **Landscape Character Assessment and Biodiversity Appraisal** prepared by **LUC Consultants** in 2020 advised that development proposals should:

1. Conserve the rural and detached character of Westbere
2. Resist unsuitable development on the outskirts of the village
3. Maintain clear distinction between settlement edges
4. Protect areas of rural and wooded character that separate Westbere, Hersden and Sturry

At the time this guidance was produced:

1. The Bread and Cheese Field remained agricultural land
2. The site formed part of the rural setting of Westbere
3. Its open character contributed to settlement distinction

WVPS submits that allocating this site for development conflicts directly with this established landscape guidance. Source:

<https://www.canterbury.gov.uk/sites/default/files/2024-04/Landscape%20character%20assessment%20and%20biodiversity%20appraisal.pdf>

14. Risk of Settlement Coalescence

Further evidence from multiple internal and external sources identifies the Bread and Cheese Field as land whose development would create a direct physical link between existing built areas.

This includes commentary from the **Council for the Protection of Rural England (CPRE)**, which noted:

1. Development of the site could result in the coalescence of Westbere and Hersden, as the site would connect Hoplands development to residential dwellings on Bushy Hill Road.

Source: <https://adisham-countryside.com/assets/default/cpre-ccc-local-plan-reg-18-cpre-kent-response-2024.pdf#:~:text=Despite%20such%20constraints%2C%20nowhere%20in%20the%20evidence,comments%20below%20regarding%20a%20flawed%20spatial%20strategy>

This concern is reinforced by earlier, internal planning evidence:

1. The 2017/18 Community Governance Review Working Party Recommendations stated that:

“A new Hersden Parish Council protects Westbere’s identity”

This statement was substantiated by a map which clearly showed the Bread and Cheese Field providing a Green Space between the two Parishes and the Hersden proposed developments. Fig 4 Refers. (The Field identified as Pol. R6.)



Fig.4

Source:

<https://democracy.canterbury.gov.uk/documents/g11637/Public%20reports%20pack%2018th-Jul-2018%2019.00%20Policy%20Committee%20-%20Decomissioned%2019522.pdf?T=10> Page 91 refers.

2. Strategic Land Availability Assessment Papers 2022, 2025, 2026

Townscape:’While not part of a designated green gap (one is located to the north), development of this land could result in the coalescence of Westbere and Hersden, as the site would connect the Hoplands development to the residential dwellings on Bushy Lane.’ SLAA 163 Column AP refers. Source:

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90367>

WVPS submits that:

1. The coalescence risk has been clearly identified
2. The Local Plan fails to properly address this risk
3. The spatial strategy therefore lacks justification

15. Historic Planning Position on Coalescence

Preventing settlement coalescence has historically formed a central component of Canterbury City Council planning policy.

In the **Green Gaps and Local Green Spaces Review (April 2021)**, the Council stated:

Gradual coalescence can harm countryside character and adversely impact village identity.

This statement reflects longstanding planning principles that:

1. Rural settlements should retain distinct identities
2. Physical separation contributes to landscape quality
3. Development between settlements should be carefully controlled

16. Removal of Anti-Coalescence Safeguards (March 2026)

Earlier iterations of the Local Plan included wording within Policy R6 requiring development to:

1. Avoid coalescence between Westbere and Hersden

The **March 2026 Proposed Submission Version** removed this requirement.

WVPS considers this change to be:

1. Significant
2. Unjustified
3. Contrary to established planning practice

The removal of this safeguard:

1. Weakens protection for settlement identity
2. Increases the likelihood of settlement merging
3. Represents a material change in policy intent

WVPS submits that:

1. The removal of anti-coalescence safeguards in the latest iteration of the draft Local Plan (March 2026) represents a departure from established policy direction
2. No clear justification has been provided for this change
3. this change directly contributes to the Plan failing the **Justified** and **Effective** tests of soundness.

17. Settlement Boundary Inconsistencies

Evidence demonstrates repeated inconsistency in how the settlement boundary has been defined across planning documents.

Notably:

1. SLAA documents continue to identify Bushy Hill Road as part of Westbere
2. Later Local Plan drafts exclude the same properties
3. No consistent planning explanation has been provided

Historic settlement patterns show:

1. Bushy Hill Road has formed part of the Westbere settlement for over two centuries
2. Development along the road is continuous
3. The exclusion of properties from the boundary is inconsistent with settlement morphology

WVPS submits that:

1. The boundary exclusion lacks proportionate justification
2. The resulting settlement boundary is not evidence-led
3. The spatial definition of Westbere is therefore unsound

18. Functional Role of the Bread and Cheese Field

The Bread and Cheese Field performs an essential spatial function by:

1. Providing physical separation between built areas
2. Maintaining landscape openness
3. Preserving settlement identity

WVPS submits that:

1. The site represents a logical location for Green Gap designation
2. Failure to recognise this role undermines spatial coherence

Part 4 – Green Gap Justification and Alternative Spatial Strategy

19. Justification for Green Gap Designation at the Bread and Cheese Field

WVPS submits that the Bread and Cheese Field represents the most logical and effective location for designation as a **Green Gap** between Westbere and Hersden.

The purpose of Green Gaps, as set out in Canterbury City Council policy and supporting evidence, is to:

1. Prevent settlement coalescence
2. Preserve settlement identity
3. Protect the rural setting of villages
4. Maintain visual and physical separation

The Bread and Cheese Field demonstrably satisfies these criteria because:

1. It lies directly between the built form of Westbere and development at the Hoplands estate in Hersden
2. It provides an open landscape buffer
3. It contributes to the rural setting of Westbere

WVPS therefore submits that:

1. Evidence from SLAA assessments and all other internal and external documents confirms that development of this land would increase coalescence risk
2. **The Bread and Cheese Field functions as an essential settlement separation zone and should be formally designated as a Green Gap.**

20. Failure to Consider Reasonable Alternatives

The NPPF requires Local Plans to consider **reasonable alternatives** and justify chosen strategies.

WVPS submits that:

1. The option of designating the Bread and Cheese Field as a Green Gap has not been adequately assessed
2. The implications of coalescence have not been properly addressed
3. Alternative boundary configurations have not been transparently evaluated

This failure undermines compliance with:

1. **NPPF Paragraph 16(c)**
2. Requirement for proportionate evidence

21. Inappropriateness of the Proposed Green Gap Location (Headley's Field)

The Local Plan currently proposes an alternative Green Gap location, locally known as **Headley's Field**. (Fig 5)

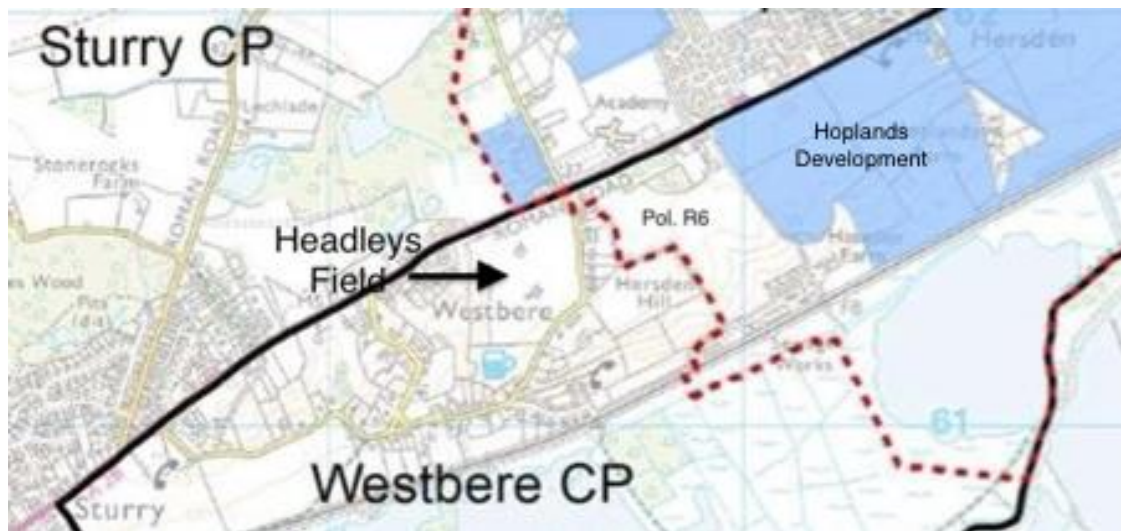


Fig.5

WVPS submits that this location is fundamentally unsuitable for fulfilling the strategic purpose of a Green Gap. Headley's Field:

1. Lies well within the Westbere Parish
2. Does not form the primary separation between settlements
3. Does not prevent physical merging of built areas
4. Does not provide meaningful spatial separation between Westbere and Hersden

As such:

1. Its designation does not achieve the intended policy objective
2. It fails to address the actual risk of settlement coalescence
3. It represents an ineffective spatial solution

WVPS submits that:

Retaining Headley's Field as the primary separation area is inconsistent with established Green Gap methodology.

22. Environmental and Agricultural Considerations

The Bread and Cheese Field possesses characteristics that increase its strategic importance.

These include:

1. Proximity to ancient woodland
2. Presence of priority habitats
3. Use as agricultural land
4. Potential ecological value

Evidence suggests the Field supports:

1. Protected and priority species
2. Habitat connectivity
3. Landscape continuity

Additionally:

1. Parts of the field are identified as **Best and Most Versatile Agricultural Land (Grade 2)**
2. National planning policy requires protection of such land wherever possible

WVPS submits that:

Development of this site would result in:

1. Permanent loss of valuable agricultural land
2. Landscape fragmentation
3. Increased ecological pressure

This further supports the case for: **Retention of the site as open countryside and Green Gap land.**

Part 5 — Failure of Soundness Tests

23. Failure of the “Justified” Test

The Local Plan is **not** justified because:

1. Settlement boundaries are inconsistently defined
2. Key decisions lack proportionate evidence
3. Contradictory documentation undermines spatial logic
4. Reasonable alternatives have not been properly assessed
5. Residents have not been provided with consistent and accurate information

The exclusion of Bushy Hill Road from the settlement boundary is particularly problematic because:

1. It contradicts earlier planning evidence
2. It lacks clear methodological justification
3. It relies on subjective descriptors such as “rural feel”

WVPS submits that:

The spatial strategy for Policy R6 is not based on proportionate or consistent evidence.

24. Failure of the “Effective” Test

The Plan, as it relates to Policy R6 is not effective because:

1. It creates foreseeable settlement coalescence
2. It weakens settlement identity
3. It removes safeguards without replacement measures
4. It creates permanent spatial conflict

An effective plan should:

1. Provide clear and deliverable spatial outcomes
2. Maintain settlement identity
3. Avoid foreseeable damage to community cohesion and integrity

WVPS submits that Policy R6 fails to meet these expectations.

25. Failure of Consistency with National Policy

National planning policy emphasises:

1. Protection of settlement identity
2. Avoidance of coalescence
3. Protection of Best and Most Versatile agricultural land
4. Evidence-based boundary setting

The current proposal conflicts with these principles by:

1. Allowing development that risks settlement merging
2. Removing previously established safeguards
3. Failing to demonstrate proportionate justification

WVPS therefore submits that:

Policy R6 is inconsistent with national planning policy.

26. Legal Compliance Concerns

The absence of documented reasoning supporting boundary changes raises concerns regarding procedural transparency.

Specifically:

1. No written record exists for critical site visit decisions
2. Boundary changes appear unsupported by formal documentation
3. Residents were unable to fully evaluate decision-making logic

WVPS submits that:

This raises legitimate questions regarding legal compliance.

Part 6 – Proposed Modifications

27. Required Modifications to Achieve Soundness

WVPS requests the following modifications to the Local Plan:

Modification 1

Remove Allocation R6 (Bread and Cheese Field) from the Local Plan

Reason:

1. Risk of settlement coalescence
2. Landscape harm
3. Conflict with settlement identity
4. Inconsistent supporting evidence preventing residents from making informed contributions to the consultation processes

Modification 2

Designate the Bread and Cheese Field as a Strategic Green Gap

Reason:

1. Provides effective settlement separation
2. Maintains spatial clarity
3. Aligns with Green Gap objectives
4. Prevents settlement merging

Modification 3

1. Amend the Westbere Settlement Boundary

Required change:

1. Include all residential properties along Bushy Hill Road
2. Reflect established settlement morphology
3. Align with earlier SLAA evidence

2. Amend the Hersden Settlement Boundary

Required change:

1. Re-draw the Hersden Settlement Boundary to within its current built-up area to the south west, thereby excluding the Bread and Cheese Field

Modification 4

Reclassify Headley's Field as Countryside

Reason:

1. Does not serve Green Gap function
2. Lies within Westbere settlement context
3. Does not prevent coalescence

Part 7 – Concluding Statements

28. Overall Conclusion

WVPS submits that Policy R6 of the Local Plan evolved from a community Governance review 2017/18 that:

1. Changed, without further consultation, the material relevancy of critical information, in the form of a map, that was provided to Westbere residents during the consultation process
2. Provided a flawed and unjustified narrative that informed the development of Policy R6

Furthermore, as currently drafted, Policy R6 contains:

1. Material inconsistencies
2. A disconnection between professional advice and decisions taken
3. Unsupported boundary changes
4. Inadequate spatial justification
5. Insufficient safeguards against coalescence

These deficiencies result in a plan that is:

1. Not justified
2. Not effective
3. Not consistent with national policy
4. Potentially not legally compliant

Unless corrected, the implementation of Policy R6 would result in:

1. Permanent erosion of settlement identity
2. Visual and functional merging of Westbere and Hersden
3. Irreversible harm to the rural character of Westbere

29. Final Statement

The Westbere Village Preservation Society remains committed to constructive dialogue with Canterbury City Council.

However, it is the Society's considered position that:

1. Policy R6 should be **removed from the Local Plan**
2. The Bread and Cheese Field should be designated as a **Green Gap**
3. Bushy Hill Road should be included within the **Westbere Settlement Boundary**
4. Headley's Field should be classified as **Countryside**
5. The Hersden Settlement should be re-drawn to **exclude the Bread and Cheese Field**

These changes are necessary to ensure:

1. Compliance with national planning policy
2. Protection of settlement identity
3. Delivery of a sound and legally compliant Local Plan

Appendices:

1. Appendix 1: Item 9. Local Plan Review and Strategic Changes (2022–2023): Response to Local Plan Review Chairperson

NOTE: Our copy is undated but is believed to have been written in September 2023.

Dear Pat,

The land transferred from Westbere PC to Hersden PC in 2018 following the Community Governance Review.

The review took place between July 2017 and July 2018. There was extensive consultation over two stages - the first asking for comments on the suitability of existing boundaries to inform the review (part one) and the second asking for comments on the proposals arising from part one.

You'll see from the [issue history](#) that the matter was raised at several committees during that time. We also held one to one meetings with each Parish Council and attended parish events when invited.

The concluding report was taken to the Policy Committee in June 2018 ([full agenda here](#)). Pages 29-31 set out the consideration of the Westbere and Hersden parish boundary issues.

For the second consultation period, the working group agreed to consult on two options for this area: i) a new Herden Parish or ii) a combined Westbere and Hersden Parish. Following representations the working group listened to the concerns of the Westbere PC and agreed to add an additional option to the consultation, referred to as option three, to retain the existing Westbere PC boundary. The consultation period was extended to allow further representations to be submitted on the third option. The working group then considered the feedback on all three options and decided to incorporate the site into Hersden PC so that all of the new development sites fell under a single parish.

The reasoning is set out on page 30 - *'The final recommendation was based around two questions. Firstly whether to recommend that a new parish be created for Hersden. If the answer is yes, the second question is whether the boundary should reflect option 1 (including the new development sites) or option 3 (excluding). On the first question, they concluded that there was a strong indication from local residents that they would like to create a new parish council for their locality. **On the second question, the working group felt that it was in the best interests of the new parish to have the new development sites within the curtilage of the new Hersden parish from the start, so that community links could be established from the moment new residents moved into the properties.**'*

The consultation results for Hersden and Westbere are summarised on pages 75-82, including the full transcript of the letter sent by Westbere PC, starting on page 78.

A map showing the final recommended boundary line is shown on page 91. A clearer view of the boundary is shown on page 6 of the final [Reorganisation Order](#) made in December 2018.

Hope that helps.

Matthew

Matthew Archer

Head of Corporate Governance

Canterbury City Council

2. Appendix 2:

Item 12: FOI Evidence and Lack of Supporting Records (2025): Canterbury City Council FOI dept. response to information request:

From: FOI CCC <FOI@canterbury.gov.uk>

Subject: Re: 24196 - FOI Westbere's Settlement Boundary

Date: 4 December 2025 at 11:43:35 GMT

To: Colin Bell [REDACTED]

Good morning

The responses we have to your follow up queries are below in light blue.

I hope this assists

Many thanks

Emma

2. When describing the 'rural lane' we are referring to Bushy Hill Road from property number 5 onwards to the south where the Westbere settlement boundary begins. This section of road is single track lane and rural in character. The fact that Blackwood House, No.1 and No.3 Bushy Hill Road are situated on very large plots creates a rural feel and functional separation in Bushy Hill Road as there are no footpaths.

Q. You state that the 'rural lane' relates to the three properties along Bushy Hill that sit on large plots. Many other properties in Westbere with a 'rural feel' sit in large plots and similar examples can be found, particularly at the southern end of Westbere Lane. These properties remain within the Settlement Boundary. Can you please explain what informed you to justify this distinction and exclude much of Bushy Hill Rd

Similarly, much of Westbere Lane between Church Lane and the A28 is single track with no footpath. In fact, there are no footpaths along any of the roads within Westbere. Can you please therefore clarify why a 'rural feel' and the absence of a footpath in one lane can contribute towards a 'functional separation' but not in the case of any other lane.

The properties on Bushy Hill Road (Blackwood House, No.1 and No.3 Bushy Hill Road) are situated within much larger plots than the properties on Westbere Lane, presenting a very sparse form of development which creates a disconnect between Westbere Lane and the properties along the northern end of Bushy Hill Road.

3. A site visit took place on the 13th August 2024 where it was observed that the properties on the northern section of Bushy Hill Road are functionally separate from the properties on the southern section of Bushy Hill Road, where it joins with Walnut Tree Lane and Westbere Lane.

Q. We are surprised and concerned that no site visit took place until two years after the proposed Settlement Boundaries were first published, particularly as the principle of site visits had been long established. Can you please explain why a site visit did not form part of the initial decision process, and what led you to decide to carry one out so long after the proposed Boundary had been established. We would also be grateful if you could provide, as previously requested, a transcript of the assessment and recommendations following the site visit.

3. As outlined in the Development Topic Paper (February 2024) paragraph 5.3.

“The following information was used to put together the settlement boundaries: Ordnance Survey (OS) mapping, satellite imagery from Google Earth and planning application data. Where there were any anomalies or uncertainties, officers undertook a site visit to double check.”

The Westbere settlement boundary was initially drafted using these digital methods. Following responses to the draft Local Plan consultation which ran between 11 March 2024 and 3 June 2024, a site visit was undertaken to check whether the initial boundary was appropriately drawn, in line with the methodology.

We do not hold any transcript of the site visit findings.

4. As part of the Call for Sites process in 2021 we invited submissions for proposed green gaps. No such submissions were received for the Bread and Field site. Only sites that were submitted were assessed. The Bread and Field site was however submitted for residential development and was assessed as suitable through the SLAA process. The site went on to be included in the draft Local Plan consultation in 2022 as a residential allocation.

Unfortunately, we can find no reference to Green Gaps in the Call for Sites 2020 document or the application form:

<https://storymaps.arcgis.com/stories/3125aeffebec49979497b84180e6d854> . There is, under the section on Community, reference to 'Open spaces' and 'wildlife habitats' but this would not have applied to the Bread and Cheese Field as it is privately owned and not, strictly speaking, a wildlife habitat. Furthermore, the Field by this time was in Hersden and not Westbere. Could you please advise where you had invited nominations for Green Gaps as part of the Call For Sites 2020 process.

4. The webpage linked below outlines the various draft options consulted on in 2021 during the Local Plan Options Consultation:

Canterbury District Local Plan

Section 7 outlines the options relating to the Historic and Natural Environment under which it is explained that the Council sought views as to whether the approach to Green Gaps was still effective. This lists the existing Green Gaps which were assessed as part of the consultation, with the consultation responses summarised within the drop-down boxes, and the amendments made as a result of the consultation further detailed in the Natural Environment and Open Space Topic Paper.

Also outlined on the website are the views received in relation to New Green Gaps. The conclusion as a result of the 2021 Options Consultation states:

“Option NE5S – think about opportunities to identify new green gaps

The Green Gaps and Local Green Spaces review didn't recommend any new green gaps, but there might be new areas which should be protected to prevent settlements merging and causing negative impacts on their setting and special character.”

Through the comments received as part of the 2021 Options Consultation, seven search areas were suggested (as listed under paragraph 3.37 of the Natural Environment and Open Space Topic Paper), with a further two search areas identified in 2022. These study areas were assessed as part of the draft Local Plan (2022) evidence base. Through the Local Plan consultations since then further Green Gap search areas have been suggested, the details of which can also be found in the Natural Environment and Open Space Topic Paper.
