

# Wickhambreaux Parish Council

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02 June 2024

## Wickhambreaux Parish Council's consultation comments on the Draft Canterbury Local Plan to 2040

Wickhambreaux Parish Council wish to comment upon the following policies:

### 1. Policy R1 Rural Service Centres

#### **Policy R7 The Hill, Littlebourne and Policy R8 Land North of Court Hill, Littlebourne**

Wickhambreaux Parish Council strongly objects to these policies for the following reasons:

- i) They will result in the loss of the best and most versatile farmland.
- ii) The increase in population by over 50% is not a natural, organic growth of a village but instead will place an immediate adverse impact upon the existing infrastructure such as schools, health and social services plus the highways network.

There is no guarantee that payments from the developers will go towards the expansion of services within the village.

- iii) Wickhambreaux School would possibly be used to accommodate some of the new children. The school is on a cramped site and lacks facilities, relying daily upon the use of Wickhambreaux village hall for its functioning. The hall only has capacity for 120 people for insurance purposes. We believe that the school roll is currently at this number.

There are no car parks and few pavements in Wickhambreaux which causes parking problems, congestion and safety issues for motorists and pedestrians. This is particularly acute given the fact that parents/carers/younger siblings must all stand outside of the school in the middle of the road at drop off/collection times.

- iv) The proposals will urbanise the rural appearance and character of Littlebourne village and village life. In its present form, the proposed agricultural sites make a significant contribution to the rural setting of the village. Policy R7 is on a slope and is visible from the public rights of way at Garrington and the highways network of Bekesbourne Lane and the A257. Policy R8 is visible from Wickham Road when approaching Littlebourne.

- v) Increase in drainage in the form of surface run off will have an adverse impact upon biodiversity, the physical environment and ecology. Flooding in Littlebourne from run off and the high water table is well-documented, frequent and evident.

The run off will drain into the Little Stour which is an internationally rare chalk river being one of a very small number in the world. It is a habitat of principal importance under Section 41 of the Natural Environment and Rural Communities Act 2006.

The capacity of the antiquated sewage system to accommodate the sites is questionable. Currently, high water tables infiltrate the sewage system which results in contaminated water and the need for tankering several times per day. Residents cannot flush their toilets and the tankering holds up the traffic. This situation has high human, economic and ecological costs.

The Little Stour is linked to other sites of ecological importance such as Preston Marshes SSSI, Seaton Pits and Wenderton Manor Pits LWS. These sites are all interlinked to Stodmarsh National Nature Reserve, which is an international Ramsar site, a SPA, SAC and a SSSI.

Stodmarsh NNR is already suffering from eutrophication and new housing developments need to provide nutrient neutrality to prevent further deterioration.

In order to offer full protection to Stodmarsh NNR, the proposed sites should not be considered until the Newnham Valley Waste Water Treatment Plant is completely upgraded. This is not planned until 2030.

## **2. Policy R11 Local Service Centres - Wickhambreaux**

i) We welcome the decision in 2023 to revise the Rural Settlement Study 2020 (RSS), due to the need to consider suggestions from the previous consultation and possible changes in facilities following the covid pandemic and the cost of living crisis.

This was a professional and positive response to these external factors.

ii) We strongly object to the methodology of the RSS (2020, 2023). In particular, the failure to include bus services and train connections in the key services or points system of the settlement ratings fatally undermines one of the main aims of the draft Local Plan.

The aim of improved connectivity to reduce carbon emissions, improve air quality, respond to climate change and enhance the quality of life for residents is substantially interdependent upon public transport. It is bewildering as to why this has not been given greater prominence in deciding settlement development priorities.

iii) The flawed methodology of the RSS (2020,2023), is further evident as there is only an extremely minimal examination and classification of bus services into regular or occasional, without any further detailed quantifying or inclusion. Occasional is described as less than one service per hour. This does not offer a precise, rigorous and robust analysis of a settlement's connectivity.

iv) Wickhambreaux is described in the RSS as having an occasional bus service. Our bus service was axed completely in 2022. Following a hard fought battle with Stagecoach, we had a minimal service reinstated. There are only 2 services into Canterbury at 7.43 and 15.28. There are 2 returning from Canterbury at 9.47 and 16.39. There are no services in the evenings, weekends or Bank Holidays.

This is categorically not an occasional service, and it is not a viable service. Residents are very poorly served by public transport as the nearest train station at Bekesbourne is 3 miles away, with no connecting bus service to Wickhambreaux. This lack of transport

options diminishes the designation of Wickhambreaux as a local service centre.

v) There is no evidence that, following the pandemic, the revised RSS (2023) reinspected Canterbury bus timetables. If this did not happen, it is a major failure given that passenger levels never regained the numbers before the pandemic and many services were cut. This may have resulted in some settlements wrongly being attributed a bus service.

vi) We would strongly urge that the RSS is revised again to include public transport options in the key services and points ratings. This is essential to achieve both the improved interconnectivity aims of the draft Local Plan and a more accurate assessment of the position of settlements in the strategic settlement hierarchy.

vii) Both Wickhambreaux and Stodmarsh have the same facilities now as those rated in the 2011 Rural Settlement Study. On the points system in 2011, they were then designated as a village and hamlet respectively, seen to be lacking in facilities and sustainability. This position resulted in Wickhambreaux having a housing development application refused by the planning committee in 2011.

By simply changing the methodology in the current RSS to concentrate upon the existence of key services, both settlements have been elevated to a local service centre and village respectively.

This contrast in methodology suggests that it is the 2011 assessment which offers a more accurate indicator of the capacity to accommodate growth and the settlements' sustainability.

viii) The school and village hall are the two key services giving Wickhambreaux its status as a local service centre. However, we would like to point out that the school is on a cramped site and lacks facilities such as a dining room. Consequently, it relies heavily upon the use of the hall on a daily basis for a wide variety of lessons, dining, activities, clubs and evening events. The hall has an insurance capacity of only 120.

This situation greatly reduces the availability of the hall during the day for other uses. It also inhibits the capacity of the school roll to greatly increase. A KCC planning application to expand the school was withdrawn in 2016 due to concerns over lack of sustainability (KCC/CA/0264/2016).

ix) The school and village hall are not essential services for everyday living. Our parish has only 6% of the population being of primary school age, 60% of residents are over 45 years and 30% are over 60 years (Source: ONS Census 2021).

Consequently, the presence of a shop, doctors' surgery or post office would be of greater importance. The absence of these services creates a reliance upon private vehicles to access everyday needs for the vast majority of our residents.

The above does not underline that Wickhambreaux is a local service centre.

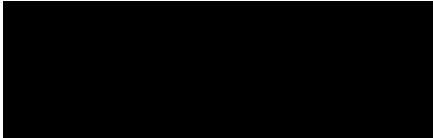
x) The historic medieval layout of Wickhambreaux, the lack of parking spaces and the absence of any car parks, limits its capacity to expand and accommodate more vehicles as well as its viability as a local service centre.

### **3. Policy R19 Countryside**

i) We applaud the boundary lines constructed around Wickhambreaux which clearly define areas within the village as countryside.

ii) We would strongly urge planning officers to pay heed to these areas when considering planning applications. The areas are important as gaps which contribute towards the rural appearance, the character of the pastoral setting and the key characteristics of the Conservation Area.

Yours sincerely



Chenice Howard-Sparkes  
Clerk to the Council