

Local Plan 2040

Ickham, Littlebourne and Wickhambreaux Conservation Society

I write on behalf of the above-named society, which covers the villages of Littlebourne, Ickham, Wickhambreaux and Stodmarsh, Stodmarsh being a part of Wickhambreaux Parish.

We are confining our comments on the Local Plan (LP) to matters directly affecting these villages.

1. Development in Littlebourne

We should like to see the sites identified for development in Littlebourne removed from the LP. These are R7, page 124, The Hill, and R8, page 127, Land North of Court Hill, This is chiefly because the waste water infrastructure in Littlebourne is unable to cope with the current volume of waste water which, combined with groundwater infiltration, results in the necessity for tankers to remove the water which the Newnham Valley Treatment Works (NVTW) lacks the capacity to cope with, and which endangers the quality of water in our valuable chalk stream, the Little Stour. It is taken to Canterbury, which, in turn, is linked to the problems at the Stodmarsh National Nature Reserve.

Proposed 'solutions' to wastewater treatment at The Hill are constantly changing and this aspect of the LP is already out of date. The latest Nutrient Neutrality Report from the developers purports to show how nutrient mitigation would be achieved through a combination of an upgrade of the NVTW, post 2030, SUDs and purchases of nutrient credits, in a non-existent market. (See our comments in Point 4 of this letter) What is the likelihood of Southern Water investment and delivery of all the necessary network by 2030?

On-site wastewater treatment plants, which have also been proposed, are notoriously unreliable, unproven, ugly, noisy and smelly and not an acceptable solution. (See responses to Planning application CA/23/00484 and the evidence submitted by Littlebourne Parish Council)

The fact is, that Littlebourne cannot take any more development until the whole infrastructure has been upgraded, many years hence, therefore these sites should be removed from the LP.

2. The Rural Settlement Hierarchy, page 16, and R11, Wickhambreaux as a Local Service Centre. Pages, 124/135.

We should like to see a review of the Settlement Hierarchy and Wickhambreaux re-assessed within it. It is not a sustainable village, being without shop or transport links. (See next section) We understand the points allocation system used but believe it has thrown up an unfair assessment for Wickhambreaux, because the school, which is in Wickhambreaux, serves all three villages (Ickham/Wickhambreaux/Stodmarsh). We would like to see population and transport links as part of the Hierarchy assessment, when it would be found that Wickhambreaux is smaller than the other Local Service Centres and much more comparable with Ickham, which is classified as a village.

3. Movement and Transportation Strategy (SS4)

We note the aim to have a bus-led system, with encouragement for walking and cycling. (page 202 onwards). Stodmarsh has no bus service and Ickham and Wickhambreaux very few buses, mainly in term time, aimed to enable school children to travel, and not helpful for adult appointments or shopping. Walking or cycling are not realistic options for the elderly, the young or the disabled, and are dangerous even for the fit on the narrow country roads. There is no space for segregated cycle routes! These are ideas for urban areas, not the rural areas. The Plan should be more specific about how rural bus services will be improved.

4. Stodmarsh National Nature Reserve

This internationally important reserve is within the parish of Wickhambreaux. The problems are well-known to the Council and you don't need us to repeat them. However, we have grave concerns about the effectiveness of the proposed solution in Policy C20, page 71, of making a wetland area on land south of Sturry Road, and the Nutrient Mitigation Strategy.

What is the realistic capacity to develop an efficient nutrient neutrality mitigation scheme and credit market based on constructed wetlands?

The Local Plan document suggests that the 15Ha wetland will 'deliver strategic mitigation'. It would be more accurate to say 'deliver about 10% of strategic mitigation'. A further 90% of constructed wetland would be required to be anywhere near effective. The Mitigation Strategy refers to a controversial suggestion that effluent from Canterbury WWTP could be pumped directly into the wetlands. As the site is upstream of Stodmarsh it seems that the 'solution' is likely to make the situation worse. Until nutrient neutrality is demonstrated development should be halted.

Buying nutrient credits in other parts of the country cannot help Stodmarsh.

5. Planning

We are unhappy to see how often the phrase 'need outweighs any harm' is used, e.g. Policy SS3, point 5, page18 'the need for the development outweighs any harm' and two other random examples, Policy R19, 3a, and Policy DS4, 1d. This is a subjective judgement which allows the planning officers to over-ride local opinion. We should like to see this qualification removed from the plan.

We should also like you to note that it is extremely difficult to use the maps. The print is too small, and when enlarged becomes too blurred to read.

Whilst this draft plan is an improvement on the previous draft, we ask you to reconsider the points we have raised.

Christine Le Jeune (Secretary)



31st May, 2024