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From: Tracey Desso [REDACTED]
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To: Consultations
Subject: Objection to Canterbury City Council's Draft Local Plan to 2040

Categories: Green category

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Good afternoon

With reference to the above, my objection is as follows:

The remit of the current council was to pay attention to the feedback from residents regarding the ill-considered plans of the previous Conservative-dominated council and therefore to reverse policies that favoured aggressive developers on the basis that they promised, eventually, to provide infrastructure to compensate for their profit-driven desecration of the quintessentially rural nature of Canterbury.

While the new draft local plan does remove two of the most contentious elements, i.e. zoning of the city and the poorly routed Eastern Movement Corridor, it still appears that the council is either frightened or in thrall of corporate developers. After agreeing a 4000-house expansion of the Mountfield site and the ever-expanding Thanington developments, the new plan further adds to the damage to the city's character by covering yet more irreplaceable natural habitats, open vistas and valuable farmland with acres of suburban estates based on the erroneous statement that it will meet local need. Targeted building of an appropriate, smaller number of homes to meet demonstrable local need is what is actually required, rather than large-scale building of massive estates driven by developers' profits and the ultimately often unfulfilled promises of useful infrastructure to follow. The more expensive houses that the developers prefer to build attract (and indeed are actively marketed to) buyers from London, thus pricing local buyers out of the market.

It is disappointing to note that many of the objections raised by local residents in response to previous planning applications have been ignored: for example regarding **Gladman proposals for large-scale development at the ancient village of Littlebourne** which, added to the large number of houses recently built there, would expand its size by around 50%, thereby irreversibly sacrificing the distinctive character of the village and its environs, in addition to overburdening its infrastructure, as has been much discussed. In this regard, no appropriate level of detail has been provided in the Draft Local Plan to assess the viability of the Littlebourne sites (R7 and R8) for any large-scale development; moreover, it seems unlikely that some of the off-site prerequisites relating to transport and waste/foul water will be resolved before 2040, let alone by 2030. It must therefore be argued that it is not logical to expect appropriate feedback on the Littlebourne site and other similar proposals **unless and until** such details may be provided as evidence that the implementation is appropriate. Furthermore, the National Planning Policy Framework requires that proposals should protect or enhance valued landscapes and increase biodiversity; both The Hill (R7) and Court Hill (R8) estates would lead to a permanent loss of Grade 1 agricultural land, and despite recent claims by Gladman that there is little recent evidence of water voles – a protected species – fresh burrows have been recorded this spring.

It must be reiterated that Littlebourne is a gem to be treasured, not a toy to be cast away in the pursuit of aims that show no recognition of, or respect for, the heritage, environmental and economic assets it represents. The proposed development of the village is completely inappropriate and unacceptable on every level, and I would strongly request that it be omitted from the Local Plan.

Of particular concern regarding the duty of the Council for Transparency and Candour:

It is especially concerning that the current plans for (R7) The Hill were updated **during the consultation period**, apparently with the agreement of Canterbury City Council. This means that the **Local Plan consultation document is now incorrect and misleading**, so the whole basis of consultation is undermined, making consideration of the site inappropriate for continued inclusion in the Plan. Full reconsideration would be needed before any future re-insertion.

The points to address would be as follows:

1. The various previous iterations of foul and surface water management have been powerfully called out for their inappropriateness for their capacity, outflows and the impact on the surrounding natural systems, nature reserves and communities downriver of the site that already regularly suffer pollution and damage.
2. The latest suggestions use a hotch-potch of foul-water outflow to an already under-performing sewer leading to a waste water treatment works that is also currently overloaded. The proposal also relies on nutrient credits from both a new, untested works and at an unspecified wetland habitat. Given that the council's own requirements for the Littlebourne site are that **the infrastructure must go in first**, this requirement should also be extended to the necessary off-site infrastructure that it is dependent upon. This means that **no building should be approved** before all the external upgrades are complete and have been **extensively tested over a substantial period**.
3. The seriousness of the current lack of wastewater treatment adequacy is highlighted in that currently – and more so since the addition of 87 houses at the Laurels estate – multiple tankers per day have been required over many months to empty the sewer in Nargate Street, to prevent overflow into adjacent houses. Some of this sewage is taken to a different WwTW discharging into the Stour, while some is discharged directly into the local watercourse. This is not only disruptive but **contravenes Habitat Regulations and adds to the issues at Stodmarsh SSSI, being non-compliant with the relevant legal mandates**.
4. The current drainage at The Hill is also already prone to causing flooding in the village downstream, and further development will worsen this issue, especially as the predictions of the consequences of climate change indicate increasingly more frequent severe rainfall.
5. Recent research has shown that roads and urban areas present previously unrealised serious risks to pollution of watercourses with surface water runoff containing a range of toxins. As these materials are generally untested for at present, there are **serious questions about the effectiveness of SuDS** such as those proposed both in Littlebourne and at other big developments around Canterbury. Furthermore, the current exit of wastewater from the site at Littlebourne runs along a watercourse with **current evidence of significant wildlife including water voles**, and into a narrow culvert under the A257, the destination of which even the developer's own submissions have admitted to being uncertain about. In fact, the culvert leads to an open brook through a nature-rich public garden that would be seriously damaged by such runoff, in both its volume and its pollutant content. The developer's lack of such relevant knowledge of the site further calls into question their competence.

Thank you for your kind attention.

Kind regards

Tracey Haynes

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