

## Alexander Gunyon

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**From:** A HAYNES [REDACTED]  
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#### **Response and objections to Canterbury City Council's Draft Local Plan to 2040, in particular to Policies R7 and R8:**

Dear Sir/ Madam,

I must first express my dismay to find, that, without any obvious public announcement by Canterbury City Council, it appears that some of the critical information in the published Local Plan 2024 was been changed well after the consultation started. I refer to the agreement between Gladman and the Council to change the proposals from the much-discussed on-site waste water treatment works at site R7 (The Hill, Littlebourne) to make use of Southern Water's currently poorly-performing foul water sewer and Newnham treatment works.

Given that, as the Plan is out for consultation, there is no circumstance under which Gladman should have already been appointed as the developer, I wonder how is it possible that the Council already has an agreement with them? If it does, this suggests that the Local Plan consultation is meaningless, as a decision has already been made. The legality of this situation must be challenged.

It is even more surprising that the 2024 Plan actually still included the on-site sewage works and conditions surrounding its implementation, despite the advice given to the Council in September 2022 by Severn Trent:

(<https://www.canterbury.gov.uk/sites/default/files/2024-04/Interim%20Waste%20Water%20Treatment%20Works%20Study%20October%202022.pdf>) (see p 3), that such an installation was not appropriate.

Such a situation therefore calls into question the accuracy of other parts of the Plan as presented.

Indeed, the whole basis of the stated housing need for the area appears flawed, being greater than that established by Canterbury's 2021 HNA figure. It seems that the Council is unnecessarily keen to make up for under-delivery of housing in previous years. However, this situation is distorted, as many already-approved houses have not yet been delivered, with delays being attributable to slow sales, meaning that it is the builders themselves who are responsible for the lack of delivery. Furthermore, if sales are stagnating, this indicates that it is not yet actually more land that needs to be allocated, but that the developers should be required to deliver appropriate types of housing on the land they already have. If they cannot do so, then the planning permission should lapse as they are unable to fulfil the Council's requirement of meeting local need. Attempts to attract more affluent buyers from outside the area merely keep prices artificially high and add to the already difficult infrastructure situation, whereas what is

needed is targeted construction of an appropriate, smaller number of homes to genuinely meet local needs, rather than large-scale developments driven by profit and promises of infrastructure improvements that subsequently lapse.

As I am a Littlebourne resident the majority of my following responses relate to sites R7 and R8, however many of the factors discussed do impact on traffic and, utility infrastructure and environmental issues elsewhere in the Canterbury area.

Littlebourne has already seen the consequences of substantial recent development, and with the new proposals, it would be expanded to one and a half times its size of five years ago, losing its village character and the proximity of many current houses to their natural vistas. Such an increase represents a disproportionate burden on village infrastructure and the established community. For example, both the doctor's surgery and school are overstretched.

Rather than organic growth of the village, designating Littlebourne as a "Rural Service Centre" imposes a corporate approach that disregards the village's character and sustainable development in tune with actual needs. The redrawing of the settlement boundary, deviating from the village's historical, rural growth pattern and encroaching into productive farmland and recreational countryside, is artificial. It converts an organic village into yet another nondescript urban sprawl, losing its essence as a desirable location. Littlebourne's population would exceed local employment opportunities, turning it into a housing satellite requiring extensive travel to Canterbury or beyond, thus increasing car journeys and once again failing to meet local needs.

As little real detail has been given of the approach to how the so called Rural Service Centre would be implemented it is difficult to determine and comment on the appropriate implementation. In the light of this it is disappointing that many concerns raised in response to previous plans and applications appear simply to have been ignored.

Previous iterations of foul and surface water management plans have been roundly criticized for their inadequacy regarding capacity, outflows, and impact on surrounding natural systems, nature reserves, and downstream communities that already suffer pollution and damage. The latest suggestions involve using an underperforming sewer system and reliance on nutrient credits from untested works and unspecified wetland habitats. The council's requirements for Littlebourne specify that infrastructure must be in place first, and this should extend to necessary offsite infrastructure. No building should be approved until all external upgrades are complete and extensively tested. However, with the current state of the water utilities it is unlikely that offsite prerequisites related to transport and waste/foul water will be resolved as necessary before 2030 as blithely suggested in the Gladman proposals.

The seriousness of inadequate wastewater treatment is highlighted by the frequent need for tankers to empty the sewer in Nargate Street, especially since the addition of 87 houses at the Laurels estate. This disruptive practice contravenes Habitat Regulations and exacerbates issues at Stodmarsh SSSI.

The current drainage at The Hill already causes flooding downstream, and further development will worsen this issue, especially considering the predicted effects of climate change. Recent research indicates that urban runoff contains a range of toxins, raising serious questions about the effectiveness of the Sustainable Drainage Systems and the offsetting of pollution with dubious nutrient credit schemes proposed for Littlebourne and similar developments around Canterbury.

In respect of other environmental considerations the proposed site lies within an area known for its well-enclosed, medium-scale field patterns, rolling landscapes, and traditional elements. Although this area is not formally designated, the Council's own plans label it as 'Littlebourne Fruit Belt', that represents the key characteristics of the broader landscape and contributes significantly to the setting and proximity of rural Littlebourne. The site is valued not only as part of the countryside but also for its proximity to the village,

enhancing its rural character. The National Planning Policy Framework requires that proposals should protect or enhance valued landscape such as this and increase biodiversity. The development of The Hill (R7) and Court Road (R8) estates would lead to the permanent loss of Grade 1 agricultural land. The claims of Biodiversity Net Gain seem very hollow when, shortly before the first development proposal, a whole row of mature trees was felled, and, despite the negative claims by developers like Gladman, there is very recent evidence (this spring) of protected species, such as water voles for example.

Transport issues are also problematic. Although the Local Plan claims new cycle routes will reduce vehicular traffic, there is no direct cycle route from Littlebourne to Canterbury, and bus services are unreliable and infrequent. The A257 is a dangerous road with several fatal accidents despite speed limits. Littlebourne is already congested during rush hours due to traffic calming measures, tight turns, and visibility issues at multiple junctions. The addition of large estates would exacerbate these problems. Even with current traffic levels, congestion on The Hill frequently leads to aggressive driving behaviours, particularly by drivers of SUVs, who often fail to slow down in narrow, constricted areas, forcing other vehicles onto the potholed verges.

The addition of 300 houses, potentially adding another 500 vehicles making multiple daily journeys, would significantly worsen congestion and safety issues in Littlebourne. One purported benefit of the Hill estate is a "relief" road to Bekesbourne Lane. However, this would increase the traffic on estate roads, including large goods vehicles, making the residential roads more dangerous.

Furthermore, with many residents seeking employment outside the village, there is likely to be increased traffic on Bekesbourne Lane towards the A2 bypass. Bekesbourne Lane is narrow, with dangerous bends, and is already overloaded at peak times, making it unsuitable for additional traffic.

The proposed access to the R8 site via Court Hill would predominantly channel traffic through narrow residential roads like Jubilee Road and Nargate Street, exacerbating existing congestion and safety issues. Increased traffic on these roads, which already struggle with HGV use and on-road parking, would be detrimental to the village. A comprehensive traffic impact assessment is necessary to understand the effects of these proposals.

In conclusion, the draft 2040 plan proposes developments that would significantly impact the landscape, conservation areas, sewerage network, and flood risk management. These concerns, coupled with traffic and safety issues, suggest that the proposals are not sustainable or viable. The plans for Littlebourne should therefore either be dropped in the light of the lack of valid consultation noted at the start, or be thoroughly re-evaluated, with emphasis on sustainable development that genuinely meets local needs and preserves the village's character and natural environment. The current proposals are ill-conceived and fail to address critical environmental and infrastructural concerns.

Kind Regards

Anthony Haynes

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