



Littlebourne Parish Council

Parish Clerk: Gail Hubbard



Wednesday 22nd May 2024

Via email to Consultations@canterbury.gov.uk

Littlebourne Parish Council's response to second public consultation for Canterbury City Council's draft Local Plan to 2040

The enclosed document represents our response to the second public consultation for the Draft Local Plan 2040 and consists of comments on: -

1. Littlebourne Policies R7 and R8.

1. General comments

- 1.1.1. Our comments should be seen in conjunction with our response to the previous public consultation draft which we sent to you on 11th January 2023 and in addition to the almost 200 responses from local residents in Littlebourne to that draft and to the planning application for the land south of The Hill (now denoted R7).
- 1.1.2. In this response we will focus mainly on the policies R7 and R8 which directly affect our parish. Littlebourne Parish Council remains against these two developments within Littlebourne Parish and abutting (ie. outside of) existing Littlebourne village boundaries and are disappointed that much of our concerns in our previous response to the first draft have been ignored. The entire viability of both these sites for large scale development depends on the detail and we believe that the practical steps required are unlikely to be resolved within the timeline of this plan – or, in the case of some issues, indeed ever. It is not logical to include these sites within the new 2040 draft plan hoping that their issues can be solved during the individual planning application processes if that is either unlikely or impossible.
- 1.1.3. Littlebourne Parish Council agrees with the removal in this version of the draft 2040 local plan of the Eastern Movement Corridor and also the removal of the development of farm land south of the A257 opposite Polo Farm and of the zoning proposals for the city.

2. Littlebourne Policies R7 and R8

2.1.1.Statement. Littlebourne Parish Council recognise the requirement for increased delivery of housing in the UK but are concerned over the scale and scope of proposed development in Littlebourne on top of the already substantial recent increases in number of houses and residents. As a further near 50% increase in the number of houses and likely higher percentage increase in residents, we feel the Local Plan 2040 represents a disproportionate increase in burden on the village infrastructure and its community which is currently well valued and supported by its residents.

2.1.2.Use of term Rural Service Centre for Littlebourne. The definition of Rural service centres is a description and not a strategy. The draft local plan still fails to logically explain why the presence of certain village characteristics means the very large and non-proportionate expansion of Littlebourne would be 'sustainable'. We believe that many of the defining elements are already over-stretched. Our school is unable to cater for all local resident needs. The GP surgery cannot cope for local demand and much consultation for villagers necessarily takes place in Bridge and Canterbury despite an adequate physical premises in Littlebourne. The presence of our local store is valuable, but typical higher local shop prices and inevitably limited selection mean that much food shopping is necessarily undertaken by residents in Canterbury supermarkets. One might assume a definition of a Rural Service Centre to be a kind of relatively complete concept for sustainability even when expanded but the Local Plan focusses on a limited specification and does not consider the key issue of employment requirements for Littlebourne expansion. Hundreds of new jobs would be needed for the residents in R7 and R8 and yet no net increased provision is scoped within the plans. With very little employment jobs available in the parish, the majority of new needed employment would inevitably require travel out of the village with consequent impacts on the constricted village traffic flows and would further define our village as a dormitory.

2.1.3.The redrawing of the Littlebourne settlement boundary is geographically artificial and illogical especially for R7. There is no reasonable sense of infill with these policies which are both outside of the built confines of the village. The combined scale of R7 and R8 is substantial and out of scale with the pattern of development of the village. It would urbanise an area which is undeveloped and rural in nature and encroach substantially into highly productive countryside.

2.1.4.Loss of agricultural land. Both Policy R7 and R8 would lead to a permanent loss of the best Grade 1 (Defra defined) agricultural land. R7 is an especially productive Grade 1 land because it is south facing and with herringbone drainage installed partly with public money in the 1960's.

- 2.1.5. Landscape Harm.** The proposals fail to protect or enhance the valued landscapes and therefore conflict with the National Planning Policy Framework (paragraph 174a). It is rather difficult to follow the argument that either R7 or R8 would meet the claimed requirement of increased biodiversity by 20% when essentially eradicating an area of countryside for houses. We strongly disagree that R7 will 'not impact landscape views to the south'.
- 2.1.6. Cycle Route improvements fall short.** Improvements to cycle connectivity, which at present is functionally absent for Littlebourne, would be welcomed but the route sketched to Bekesbourne station is still unclear and indirect. A better route might be from R7 along the north border of Howletts zoo along new cycleway direct to the station. However, even with this, the plan fails to aid the dangerous but arguably much more useful potential cycle access to Canterbury City centre shops or the Canterbury West station with its fast train access to London. At present we believe the 2040 draft plan would have no useful value in encouraging more cycle commuting from Littlebourne.
- 2.1.7. Lack of employment options predicate un-sustainable increase in commuting travel.** The provision of 400sqm of business premises in R8 might only just compensate for the removal of current business units required for R8 to be accessible. The draft 2040 plan fails to indicate how the absolute requirement of employment for a likely over 50% increase in new employment age residents in Littlebourne would be achieved in any sense at a local level and thus fails to fulfil the broader definition of sustainability.
- 2.1.8. Worsen the already inadequate sewage management capacity.** We are aware of various proposals for managing sewage effluent from both developments (R7 and R8), of which the main ones are:
- A. Onsite treatment plant.** The draft 2040 plan proposes an onsite treatment plant despite objections from the Environment Agency regarding its discharge into a low-flow chalk stream. Concerns over aesthetics and potential environmental harm from chemical, pharmaceutical and other residues are raised. The discharge path, passing through a damaged, flood-prone culvert and nearby important community spaces, could threaten the Little Stour Chalk Stream and Stodmarsh Nature Reserve downstream. *[Note: it appears this option had now been shelved in favour of the following]*
- B. Discharge to the main sewerage network.** Connecting to Southern Water's sewage infrastructure for additional effluent discharge presents numerous challenges. The network is vulnerable to groundwater infiltration in the Nailbourne/Little Stour catchment and is overwhelmed by current flow volumes, leading to the risk of frequent sewage flooding in the village. To mitigate this, Southern Water implements disruptive emergency measures like daily road tanker use, often for months, and occasionally pumps raw sewage

into the river. Additionally, the Newnham Valley Wastewater Treatment Works is already operating well below its capacity.

Further comments on both of the above proposals are provided in the later sections respective to each development. Our concern is that neither would provide a sustainable viable solution, and we recommend that both R7 and R8 are removed from the 2040 local plan until this critical issue is resolved in reality (not just theoretically).

2.1.9. Contravention of Habitat Regulations. Violation of Habitat Regulations: The utilisation of tankers to address sewer flooding has a significant adverse nutrient impact on the internationally-designated Stodmarsh sites. Research conducted in Littlebourne in 2022 revealed the deployment of approximately 500 tankers over several months in the 2021/22 winter/spring season to collect raw sewage, later discharged at Canterbury Wastewater Treatment Works upstream of Stodmarsh. As of April 2024, daily tanker use persists in Littlebourne and nearby villages, causing substantial disruption to residents and traffic. This clearly fails to comply with the legal mandates of the Conservation of Habitats and Species Regulations 2017.

2.1.10. Flood Risk: The 2040 plan overlooks the escalating concerns regarding increased surface water runoff from urbanisation, posing a significant flood risk to lower Littlebourne and jeopardising the water quality of the cherished Little Stour chalk stream. The current drainage system at the R7 site is particularly prone to flooding, and further development will worsen this issue, as evidenced by past storms in the early 2000s affecting homes along the High Street. Climate change predicts an increasing regularity of severe rainfall events. Moreover, there's mounting worry about surface water contamination with pollutants like heavy metals, hydrocarbons, microplastics, and pesticides from roads and urban areas, potentially harming the Little Stour. Recent BBC studies have underscored the pollution of English waterways with toxic substances during heavy rainfall. Despite potential benefits, the effectiveness of Sustainable Urban Drainage Systems (SuDS) may be limited due to impeded drainage conditions at the R7 site and the inability to utilise the flood-prone damaged pipeline currently draining the field site.

2.2. Policy R7 specific comments

2.2.1. Recent Planning Rejection. This policy envisages up to 300 houses which is nearly 3 times the size of the planning application by the same developers that was comprehensively and appropriately rejected by the Canterbury City Council planning department in September 2021. The past plan for 115 houses was also rejected by 96% in a poll of Littlebourne villagers and the greater scale of the new plans have received a similar village disbelief and disapproval. The Policy R7 differs

little from the rejected application except an even larger scale of development and a through road from The Hill to Bekesbourne Lane – the likely effects and risks of which are not assessed in the draft Local Plan.

R7 does include many criteria which are aimed at some issues raised in the recent smaller plan rejection. However, Littlebourne Parish Council remain concerned that these new provisions (many of which are vaguely worded) will not actually address the fundamental issues of any such a development and its effects on the village or may not be fully honoured in any subsequent final plan agreements.

2.2.2. Hazardous Road Access. The proposal for up to 300 dwellings would potentially equate to approximately 500 extra vehicles at one to two per household (based on numbers from the current Laurels development off The Hill and which appears to be an underestimate of true need). The access to the site as proposed is via a Link road running between the A.257 at The Hill and Bekesbourne Lane. This would mean many vehicles moving off the site at peak times onto to either of the stated roads. The A.257 is already congested at these times with traffic passing through the village as well as local traffic and likely to be further worsened by the many other developments along the A257. The access onto the A.257 as proposed is dangerously close to the top bend on The Hill that has proven speeding problems beyond the 30mph limit as picked up from the local Speedwatch group. It is also within approximately 100 meters of the access road into the 55 dwelling Evenhill Road estate and the 87 dwellings development of The Laurels and would add to the existing problems that those developments contribute. Evenhill Road and The Laurels estate road are both the sole access routes from the A257 to their estates. If such a junction to The Hill is to be progressed the Parish Council would recommend it is of a design to necessarily reduce speeding up and down the Hill. Traffic exiting the site onto the A.257 and turning right towards the centre of the village or entering the site from the Canterbury direction will have to brave the traffic flowing out of the city and such speeds and restricted view around the top bend would be a danger. Surveys have shown some drivers exceed the speed limit very significantly – even up to 80mph and this area has been subject to several serious accidents. Traffic coming off the site onto Bekesbourne Lane heading towards the village and the junction with the A.257 face a congestion problem and a dangerous turn right heading towards Sandwich and the faster route through to Thanet. Bekesbourne Lane is a narrow local service road with occasional width restrictions as well as a weight limit and has little capacity for a larger amount of extra vehicle movements.

Alternate options (not proposed) for a site entrance road lower down The Hill could also have major problems by conflicting with busy road junctions – the entrance to the Laurels estate and Jubilee Road – and would be similarly unsuitable for the narrow A257. Any consideration of

a sole access from Bekesbourne Lane to R7 would be un-tenable due to the scale of traffic increase along this narrow country lane.

If R7 goes ahead, the proposed 'link road' from The Hill to Bekesbourne road within the site should be of a quality of size and separation from housing to avoid it being permanently prevented from becoming part of any eventual and more desirable true relief road for Littlebourne.

2.2.3. Landscape impact. The site proposed lies in the North Kent Fruit Belt Character Area. This is characterised as having well enclosed, medium scale field patterns. Rolling quiet and picturesque. Traditional elements such as hops and orchards are characteristic giving way to arable. The visual unity is described as being generally coherent. Although there are no landscape designations as such, the land is representative of the key characteristics of the landscape character area within which it lies. The landscape is valued not only by being part of wider countryside but because of its juxtaposition to the built confines of Littlebourne, the way in which it contributes to the setting of the village and the significance and importance of the surrounding countryside to those who live, work in and visit the village. The importance of the site as the closest part of countryside adjacent to the village, as part of the wider rural landscape within which Littlebourne is located, together justify the conclusion that this is a valued landscape which should be protected and enhanced in accordance with paragraph 174a of the National Planning Policy Framework. We consider no version of an estate could avoid major and harmful impact on the landscape views from either the land itself or from the current Littlebourne conservation area.

2.2.4. Effect on Littlebourne Conservation Area. The proposed R7 site adjoins the south-western boundary of the Littlebourne Conservation Area. Opposite the site is the Grade II listed Coachman's Cottage and immediately to the north the Grade II listed Holly Lodge. The proposals risk harm to this conservation area and to the designated heritage assets.

2.2.5. Inadequacies of the Existing Sewerage Network. It is already well understood that the sewerage network in many parts of the Nailbourne/Little Stour catchment is exceptionally vulnerable to groundwater infiltration. Uncontrolled infiltration creates regular, and persistent wet weather emergencies where the network capacity simply cannot cope with the flow volume required. Southern Water's *Infiltration Reduction Plan* details the extent of this problem and presents both long-term mitigation measures and short-term emergency responses aimed at prevent householders having to cope with internal sewage flooding. Investment aimed at reducing infiltration through e.g. lining pipework, has had limited effect - a fact borne out by monitored flow rates into Newnham Valley treatment works. Littlebourne already endures regular, disruptive emergency measures aimed at avoiding capacity-related sewer flooding.

Another aspect of the systemic breakdown of the sewerage network is the significant under-capacity of the Newnham Valley treatment works. Data from KCC's report "Kent Water for Sustainable Growth" (2017) indicates that these works would exceed the Environment Agency's permitted levels for "dry weather flows" by 47% with just an additional 117 dwellings in the entire catchment by 2031—a level of growth already surpassed. This undercapacity contributes to the necessity for tankers to deposit sewage elsewhere.

One of the primary measures involves using fleets of road tankers to remove excess raw sewage from specific village locations, mainly discharging it at Canterbury's treatment works upstream of the Stodmarsh sites. It's established that a significant portion of wastewater from the Nailbourne and Little Stour catchment exacerbates nutrient issues at Stodmarsh. The regular deployment of tankers to deposit untreated wastewater from this catchment to Canterbury WwTW establishes a direct impact pathway to Stodmarsh. Southern Water data from April 2019 to February 2022 indicate approximately 500 road tankers were deployed during this period, amounting to around 10,000 cubic meters of raw, untreated sewage. This practice not only incurs high costs and burdens the lower village but also signifies an ongoing failure to comply with the legal requirements of the Conservation of Habitats and Species Regulations 2017. In exceptional years, over-pumping of screened raw sewage into the stream may be required in addition to tanker use, presenting hazards both to people and to aquatic life.

At the time of this response (April 2024) tankering is still required daily in Nargate Street and frequently, Bekesbourne Lane. Littlebourne Parish Council have asked Southern Water when they would be confident that future winters would not require tankering and they have not responded which we take to mean that there is no such confidence that without huge investment it will be solved and ready to cope with more demand. R8, although a smaller development, would still cause extra sewage to flow down to the lowest part of the catchment in Nargate Street and lead to the same issues albeit proportionately at lower scale.

Southern Water is aware of further wastewater handling issues including substantial surface water ingress into the sewerage system in parts of the village (e.g. Jubilee Road, High Street, Bekesbourne Lane, Court Hill and perhaps other areas too).

Taking this context into account, the proposal to connect over 300 dwellings—representing some further 50% increase in volume of sewage—into this failing sewer network appears to be disastrous. It represents a risk not only to the integrity of designated sites of international importance which are protected under the Habitats Regulations, but also to the iconic Stour Valley Floodplain (East) i.e. the diversity of habitats adjacent to the Little Stour chalk stream protected under the Natural Environment and Rural Communities Act 2006 listed as of 'principal importance' under S41. These include Preston Marshes

SSSI not referred to in the Local Plan, which presents a habitat closely linked to Stodmarsh sites.

As previously mentioned, the proposal to utilise an onsite high-quality wastewater treatment facility has been abandoned by the applicant under R7, although it remains a specified option in the Local Plan. Despite lacking details on effluent routing or discharge points, such a plant would discharge effluent, potentially containing environmentally harmful chemical and pharmaceutical residues, into surface water. This combined discharge would traverse a flood-prone damaged drainage pipe on The Hill, pass underground past the Village Hall, and emerge into a surface ditch along Turners Orchard, ultimately posing risks to the pristine Little Stour Chalk Stream and the downstream Stodmarsh Nature Reserve. Given the protected status of the Little Stour as a stream, it is highly unlikely that this scheme would be permitted by the Environment Agency. Additionally, key concerns include the unsightly aesthetics of large-scale machinery in or near the village centre.

To conclude this section, we believe that the considerations presented above are of fundamental importance to any properly planned development, and that it is inappropriate for them to be left as part of ‘reserved matters’ rather than being described in full detail within any planning application. We have further concerns over the long-term reliability and economic viability of such small local systems, which in any case of failure or inadequate maintenance would have devastating consequences on the ecology of the Little Stour rare chalk stream in the village and, downstream, risk the Stodmarsh Nature reserve.

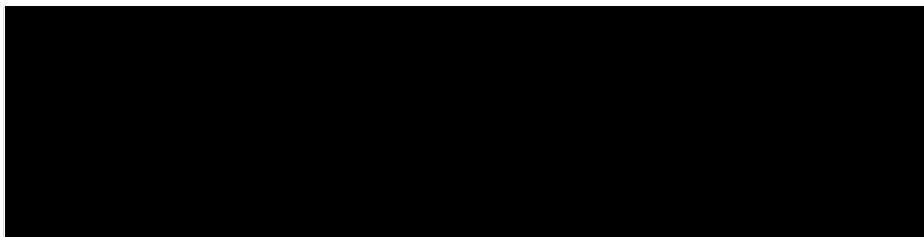
2.2.6.Flood Risk to the lower Littlebourne Village. In the recent past and notably when ground water levels have been high and the Nailbourne has run, the lower parts of Littlebourne (Nargate street, The Green and eastern end of the High Street) have been subject to floods significantly affecting local residential properties and parts of the Littlebourne House care home complex. Policy R7 (and R8) lack a cogent forward plan to address multiple impacts of increasing surface water run-off from urbanisation on flooding along Nargate Street and on the water quality in the Little Stour - a rare example of a chalk stream enjoyed by many local inhabitants. Such water-related issues will become far more significant because of a near 50% increase in village population and the effects of climate change. Both factors may result in greater flows of both surface water and wastewater. The Local Plan must address the potential increased risk to residential property and carefully consider how substantial housing development and associated water-based pollution can be kept consistent with stated objective of habitat protection and biodiversity enhancement by 20% during implementation.

2.3. Policy R8 specific comments

Waste water management. Under the local plan, it is implied that no onsite facility will be provided given the lower number of dwellings proposed (ca. 100) and therefore that there would be an expectation to connect into the main sewerage system running down Court Hill and Church Road. We are concerned that this could further over-burden the network capacity issues in the same way as have already highlighted above, risk yet further river pollution and disruptive tankering. Until such time as significant capital investment has been made into sewerage system upgrades (i.e. both network and upgraded treatment works), and these have been successfully commissioned, both this site and R7 should be considered non-viable for housing development.

2.3.1. Access and Transportation. R8 simply proposes road access onto Court Hill (realistically this would be the only feasible road access). On the assumption that the majority of R8 residents' vehicle journeys would be via the A257, we have concerns particularly on the effects of increased traffic on the narrow residential Jubilee Road and the very tight junction between Nargate Street and The High Street (A257). The prime and likely access to the site would be via Jubilee Road both during construction and afterwards. Jubilee road has already a problem with HGV use accessing local farms and a small industrial estate as it has no weight restriction. It has a large number of cars parked along it as many houses have no off-road parking thus causing width restrictions along its length. Congestion is already very evident on this road, particularly on the school run times. Alternative access via Church Road leads past the local junior school, congested already at peak times with student drop off and pickup, to a junction with Nargate Street which on turning right towards the village centre has a 7.5 tonne weight limit and is a narrow street also with on road parking and a very narrow access onto the A.257. With 50 houses it would lead to an additional 75 to 100 vehicles accessing these narrow local service roads. There is little to no traffic assessment studying the impact of these draft development proposals along with other developments along the A.257 corridor from the proposed Eastern Movement corridor City outwards. Local knowledge of the existing problems would indicate that the traffic movements through and around the village would be detrimental to the village.

On behalf of Littlebourne Parish Council



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