



Policy and Strategy Team  
Canterbury City Council (CCC)  
Military Road  
Canterbury  
CT1 1YW

19<sup>th</sup> December 2022

Dear Sirs

**Canterbury Local Plan – up to 2045**

I am co-owner, with my wife Monique, of the above property. We have been Littlebourne residents and paying Council Tax to CCC since 25<sup>th</sup> April 2002. We are both keen supporters of English village life and wildlife enthusiasts

I write on our joint behalf to protest vehemently against this plan which we believe has been drawn together to assuage the demands of national government for housing. To us it is crystal clear that the benefits of this plan are completely outweighed by all the problems that it would create. I list these below but before doing so would like to make some general points.

The first point is from the plan itself which states (on page 128) “... *within the countryside, new housing development will only be supported where it protects the rural character and appearance of the countryside*”. There is no way that the proposals of this plan could meet its own condition.

On the most simplistic level it would change the fundamental nature of the whole area that it covers. The Plan’s R15 (300 houses) and R16 (50 houses) would turn Littlebourne into “BIGBOURNE”. Those sections of the plan also take away permanently prime Grade 1 agricultural land. The plan’s proposals would engender excessive urbanisation outside of the Littlebourne settlement boundary which seems to have been artificially and illogically redrawn to fit the plan.

Our second point relates to a statement and letter recently circulated to Members of Parliament by Michael Gove (Secretary of State for levelling up, housing and communities). This missive “waters down” the government’s housing target (300,000 new homes every year by 2025) by stating that this is now to be **advisory** rather than mandatory but will remain as “*a starting point with new flexibilities to reflect local circumstances*”. It also promises to “*block new developments if government considers them too ugly*”.

This is a major “U turn” in government policy. This is still subject to consultation but the backing of the Secretary of State would seem likely to favour its adoption. In our view the Canterbury Plan would have to take advantage of these proposed changes and be radically redrawn or withdrawn as unfeasible.

We will now put forward the specific areas supporting the rejection of this plan.

*Continued*

## **Canterbury Local Plan – up to 2045 - continued**

### **1. Impact on local infra-structure – flooding and sewage**

The area covered by the plan contains the main tributary of the Little Stour river and storm-water run-off. This is a key feature of local infrastructure. The 2,941 new houses proposed would put an unacceptable strain on this facility and considerably upscale the already high risk of flooding and sewage pollution. Southern Water have already had to bring in tankers to cope with the sewage in some areas.

Sewage has been pumped into the Little Stour and tankers (500 in the 2021/22 winter) have discharged their load into the Wastewater Treatment works which is upstream of Stodmarsh and close to the National Nature Reserve that is home to a large variety of aquatic birds and animals. The introduction of such adverse nutrients fails to meet the legal requirements of the Conservation of Habitats and Species Regulations 2017. They would also destroy the Little Stour water quality. We would lose a rare Kentish chalk stream – renowned for the clarity of their water.

It is inconceivable to adopt a plan that is not only partly illegal but potentially so environmentally destructive. To do so is a gross dereliction of the moral duty of our generation to maintain our natural assets for future generations. The Plan must consider how substantial housing development and associated water based pollution can be kept compliant with the declared objectives of habitat protection and biodiversity enhancement by 20%.

It is incomprehensible how one would even consider a plan that risks over-straining the system. The obvious risk to public health and the fouling of water services argues definitively against its implementation. The effect of Global Warming is already adding to the pressures on the system – this Plan might be “the straw that broke the camel’s back”.

We have also read that the National Electricity Grid is under considerable strain in some areas (a 10 year ban on new housing was suggested for West London). The Plan’s addition of almost 3,000 new homes with related services (shops, schools, medical facilities etc) will surely put the power supply to the Plan area under excessive and dangerous pressure.

### **2. Traffic and road safety**

The area has been beset with problems caused by the volume and speed of the traffic – both local and “passing through”. Traffic Calming measures have had little effect. The plan lacks a traffic assessment which implies that this issue has been ignored which is unrealistic and dangerous.

The figures speak for themselves - Almost 3,000 houses with residents owning an average of two cars per house (which 80% of households do according to recent research). Add to these service and commercial vehicles results in some 6,500 vehicles inflating the current overheated traffic. These will be accessing, leaving and travelling round the area several times a day for work, school runs, shopping, deliveries etc.

The outcome can only be a massive upsurge in noise and pollution levels and an unconscionable increase in road traffic accidents with injuries and fatalities resulting.

The plan makes no provision for cyclists nor does it consider making the dangerous roads (those narrow with no footpath) safer for pedestrian traffic. Both types of road users would increase materially under the plan – as would the risk to their safety.

Continued

## **Canterbury Local Plan – up to 2045 - continued**

### **3. Misuse of the land**

The development proposes to use high yield arable land with deep loamy soils and a good crop yield history. To negate this decries the acute need in the UK for food production that is already strained by Global Warming and the impact of “Brexit”. We have already mentioned the wrongful misuse of prime arable land for the housing developments of R15 and R16.

### **4. Village ethos**

Our splendid Kentish village has history and is a popular place to live and to visit. The plan proposals add 350 houses to Littlebourne village – an increase of almost 50%. This would completely change the nature and character of the village. There have already been several developments already allowed that have materially affected local facilities, traffic and services. We believe that implementation of this plan would be deleterious for Littlebourne.

### **5. Biodiversity**

The Kent Biodiversity plan seeks to maintain our ecological surroundings and prevent the loss of endangered species by restricting the encroachment of aggressive development.

The building sites proposed by the plan have already proved to be home to many protected species. This includes dormice, badgers, skylarks, birds of prey, lizards, slowworms, butterflies, moths and wildflower species. We have found natterjack toads, frogs, newts and a diverse bird population in the designated sites.

### **6. Omitted detail of the plan**

The plan does not include the additional infrastructure requirements indicated by its house building proposal. Sewerage, schools, medical clinics, public transport, cycling paths, safe roads for walkers, public houses, children’ playgrounds, etc are fundamental to any development and need to be factored in for feasibility and cost. The existing facilities could not cope with the increased population and traffic.

It also fails to meet sustainable development standards as it lacks proposals for increasing local employment. Residents of the proposed new houses would have to commute out of the area to earn their living. This not only creates a burden on local transport services but also takes valuable spending (food, beverages, reading material etc) from local businesses.

These omissions from the plan not only question the planning proficiency of its proposers but also casts grave doubts on its likely fruition.

### **7, Archeology and history**

We have recently heard talks by local archaeologists in which they have described recent exciting local finds of valuable historical interest that would increase knowledge of “Littlebourne past”. Their objective is to extend their “digs” with the expectation of further discoveries and increasing knowledge of our local past. The plan proposals would prevent this and destroy potential sites – thereby inhibiting the acquisition of knowledge of our local past. This is not only morally reprehensible but also “flies in the face” of accepted priorities where historical interests clash with modern development.

Continued

## Canterbury Local Plan – up to 2045 - continued

### Conclusion

We are simply asking that you acknowledge the omitted elements of this Plan, admit its serious flaws, recognise the severe downside risks attached to it, and accept its failure to adhere to the Kent Biodiversity Plan and environmental legislation. These are undoubtedly irreparable cracks. These factors argue conclusively that there must be a complete re-write and re-submission of the plan – or, more likely, its complete withdrawal.

Yours faithfully

A large black rectangular redaction box covering the signature area.

PFJ Bruff (Mr)

Monique Bruff (Mrs)