

Canterbury District Local Plan 2045

This submission is made on behalf of the Ickham, Littlebourne and Wickhambreaux Conservation Society. Stodmarsh is part of Wickhambreaux Parish.

Our particular interest is in the approach to the rural areas.

Policy SS1. We fully support your statement that 'The Council will work with its partners to support and sustain the full recovery of the Stodmarsh National Nature Reserve designated site and to meet its targets for water quality and improve bio-diversity.'

The villages we represent share a common problem related to waste water management which will be exacerbated by any further development. We are especially concerned about the eutrophication at the Stodmarsh National Nature Reserve. You must be aware that eutrophication is the process by which a body of water becomes enriched in dissolved nutrients, primarily nitrogen and phosphorous, that stimulate the growth of aquatic plant life, resulting in the depletion of dissolved oxygen. This is a problem at the Stodmarsh Reserve which needs urgent remedial action.

Normally sewage and other waste water from this area would go to the Newnham Valley Waste Water Treatment Works. This works does not have the capacity to cope with waste from the existing infrastructure. There is ground water infiltration into the waste water/sewerage infrastructure. Between April 2019 and February 2022 over 10,000 tonnes of untreated sewage was taken from our network by road in over 500 tanker journeys and discharged at the Canterbury Sewage works in Sturry Road. Despite the hazard and pollution of all this additional traffic on the roads, this does not solve the problem as the Canterbury works are upstream of Stodmarsh, and there is a specific impact pathway from the works to Stodmarsh.

The suggested mitigation of creating a wetland site at Sturry Road is quite inadequate. The Nutrient Mitigation Study has demonstrated that at least ten times the amount of land identified would be required for conversion into wetland in order to achieve effective strategic mitigation. Neither the technical

feasibility nor the long-term economics of this have been addressed under the Local Plan.

We particularly direct your attention to the evidence submitted by Mr Timothy Bostock, one of our members, in his papers on Habitat Regulation Assessment, and The impact of development in the Nailbourne/Little Stour Catchment on the designated sites and priority designated river habitats. (See appendices). Serious concerns have also been expressed by Littlebourne and Wickhambreaux Parish Councils.

Investment and Improvements to the infrastructure are needed before any further development is allowed in this part of the Canterbury district.

Policy SS2 We support The Sustainable Design Strategy.

We should like to see a clear definition of 'sustainable' in relation to geographical location of new building. It is easy to define 'sustainable' in terms of carbon and emissions in buildings etc. but we also need definition in social terms for living in new developments, such as community facilities and services, bus services and how the people can live without needing cars. To walk or cycle is not feasible for everyone in rural locations.

1.18. We do not support the development of a new garden community at Cooting Farm, Adisham. The Adisham sites would drain into the Wingham River which joins the Little Stour near Wickhambreaux. Inadequacies at the Dambridge Waste Water Treatment Works massively increases the risk of downstream river pollution and significant irreversible damage in an area that includes protected habitats including Preston Marshes SSSI.

There is not the infrastructure in the surrounding area to make this a sustainable proposition. It will destroy the traditional wide-open landscape and much prime agricultural land at a time when the UK should be doing more to become self-sufficient in food production.

Policy SS3 We note that Local Service Centres will have 'limited development which protects the rural character', and the 'need for the development outweighs the harm'. This is a subjective judgement which needs further clarification.

Policy SS4. This includes the Canterbury Circulation Plan (CCP). The different zones around Canterbury will involve greatly increased journey lengths and

increase pollution. City Centre car parks will be removed and there will be 'improved public transport connectivity across the city'. Public transport also needs to be extended to the villages which have just lost their bus services. We support the idea of improved public transport but this should be put in place **now** to reduce the use of the existing ring road. If car parks are to be removed Park and Ride should be free. Merely increasing cycle lanes disregards the needs of the young, the elderly, the disabled and anyone with mobility issues who will not be able to use them.

As for 'walking and cycling routes to connect rural settlements to each other and to the urban areas', has anyone been into the rural areas and seen the width of the country lanes? It is dangerous now to walk along the narrow lanes and where are the cycle lanes to go? This is ideology gone mad and is not practical.

Policy SS5 2k) provision of 'new and improved waste water treatment facilities'. We agree that these are essential and urgent. (See our submission under SS1) Where will they be built and when?

Canterbury Policy C24 Land to the south of Sturry Road. This land is for the 'delivery of a strategic wetland as part of the Canterbury Nutrient Mitigation Strategy'. This is quite inadequate provision (see our submission in SS1.)

Rural Areas

The government has removed the obligation to meet specific targets for the number of houses to be built in each area. Farming in east Kent has always been important in the national food production, and we urge the Canterbury City Council (CCC) to resist building on greenfield land.

Policy R2, 1c) Refers to minor development. Please can we have a definition of minor development?

Littlebourne . Policy R14 There is no reference to the need for improved waste water treatment facilities.

There is no suggestion as to how the improvements to the cycling connectivity to Bekesbourne Station is to be achieved. The road is narrow and with no space for a cycle route.

Policies R15 and R16 Development at The Hill and Court Hill

Littlebourne does not have the capacity to take a further 350 houses. In 2021 an application for 115 houses at R15, The Hill, was refused by CCC. (CA/21/01657). This application included provision for a private on-site wastewater treatment plant. However, there was no indication where the outfall for this would be. A Local Plan Consultant Report suggests outfall to the Nailbourne/Little Stour which is clearly unacceptable. See our comments in SS1 on wastewater treatment problems and our appendices.

The school and the surgery will not be able to cope with the additional population and the road through Littlebourne and the junction with Nargate Street and Bekesbourne Lane is already dangerous without additional cars. With so many homes planned east of Canterbury the extra traffic passing through the village will increase the dangers.

Policy R21 Local Service Centres

We disagree with Wickhambreaux being designated as a Local Service Centre.

We wish to draw your attention to the unfairness of **The Canterbury District Settlement Study (2020)** which designates Wickhambreaux as a Local Service Centre. The points basis on which the hierarchy is based is inaccurate as it erroneously gives Wickhambreaux a point for a playing field in Chartham. Additionally, Wickhambreaux is the only village within Ickham, Wickhambreaux and Stodmarsh to gain points for having a school and a playing field which serves all three villages. This already brings more parking and traffic problems to Wickhambreaux, hardly an advantage, and should not be a basis for granting more development. Anyone visiting Wickhambreaux can see that it is a smaller and more compact village with a smaller population than any of the other settlements in the same category. We wish to see Wickhambreaux re-classified as a village.

1c) Please can we have a definition of Minor Development?

1di) Who identifies local need? Can it be the Parish Council?

Policy R28

Please may we have a definition of 'infill'?

Policy DS7 Use of Community Infrastructure Levy.

New infrastructure should be delivered 'at the right time'. The right time is before development begins.

The ability to raise the infrastructure levy should not be allowed to be the driver for giving planning permission for large developments. It is well known that building more roads does not diminish traffic, it increases it. For example, if 19,000 further houses are built to finance a new eastern by-pass for Canterbury, there will probably be a further 29,000 more cars on the roads. With an average of 6 journeys a day per car, that is 174,000 more vehicle movements a day. Not everyone will use the by-pass. They may go in a different direction. Whatever public transport is offered it is unlikely people will give up the convenience of their cars. Such new building will be counter-productive and make the situation worse. Improve public transport for existing residents.

Policy DS17, 18 and 19, 20 and 21. Habitats of International, National and Local Importance, sustainable drainage and bio-diversity recovery.

We support these aims.

See our submission for SS1 In relation to the Stodmarsh NNR

Policy DS22. We support the need to be sympathetic to **Landscape Character**

Policy DS 26. We support proposals to protect **the historic environment**, particularly in Conservation Areas.

Policy DM 15. We agree that all developments should include **identified drainage provision**.

Policy DM16,17 and 18. Water Pollution, noise pollution and dark skies. We agree with all the points in these policies

Transport Topic Paper (2022)

See our comments on Policy SS4 of the Local Plan on the proposed zones for the centre of Canterbury.

There is great emphasis throughout the paper in providing a network of cycle routes. But to cycle is not a practical solution for young children, or the many elderly or people with reduced mobility, who may not be technically disabled but who may not be able or safe to cycle.

There is expectation of improving bus services but nothing agreed with Stagecoach, who are reducing services. This hope over experience.

The existing ring road is to be reduced to single carriageways with one traffic lane in each direction, halving its capacity. The eastern movement corridor is to be of similar width, two lane single carriageways. This surely means that the traffic jams and pollution which the Council seeks to avoid will merely be transferred from the centre to the outer roads. There will be more vehicles and no additional capacity. It will not be worth the expense of building the eastern movement corridor when you consider the thousands of new houses (and consequent additional vehicle movements) that will result from the scheme.

All this is supposed to improve the quality of life for residents, but is likely to have the opposite effect.

One gets the impression of a paper exercise, not grounded in reality.

Christine Le Jeune (Secretary)

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