

Mrs Emma Quinn

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To the Canterbury City Council Planning Policy Team

I write in reference to the consultation on the emerging local plan. As a resident of Bekesbourne Lane I am directly impacted by the proposals for Littlebourne set out in policies R2, R14 and R15 and am therefore commenting with regards to the suitability of these policies to ensure that any growth proposed in Littlebourne is appropriately located, delivers the infrastructure needed, respects and enhances landscape character and is of a scale, density, quantum and massing that supports local distinctiveness, and responds to the prevalent character of this historic village.

In short, I object to the proposed policies R2, R14 and R15 as worded and consider significant changes are required, alongside a reduction in the development area, quantum of development and densities to support local plan policies that are legally sound and not subject to a future legal challenge.

Littlebourne is identified alongside a number of other settlements such as Bridge, Chartham, Hersden and Sturry as a Rural Service Centre in the emerging local plan policy R2. Looking at Chartham and Bridge as comparable villages in terms of population and services (albeit Chartham has a station) it is clear from policy R2 that a disproportionate level of growth is proposed at Littlebourne compared to the other Rural Service Centres, with no evidence provided as to why a greater level of growth should be accommodated in the village to respond to the settlement hierarchy evidence base.

Indeed, no other RSS settlement is proposed to take as much growth – Littlebourne is proposed to accommodate twice the new homes of Chartham and almost twenty times that of Bridge.

The allocation at R14/R15 appears to be over development and needs far greater capacity analysis and landscape assessment to reduce the amount of development and extent of development. The allocation is particularly surprising given a recent refusal of planning permission for 115 homes on the northern part of the allocation site. The reason for refusal identified a number of constraints that the proposed allocation does not appear to address, namely:

- Urbanisation of the countryside
- Harm to designated heritage assets
- Unacceptable ecological impact
- Unacceptable impact to the highways network, particularly along the A257
- Unacceptable risk of surface water flooding

Whilst it is appreciated that measures could be taken to address these concerns through the policy wording, both on site and off site to do so will require a significant reduction of development area and evidence to demonstrate that the off site highway impacts can be mitigated and that the amount of growth can be accommodated on the local road network and within the village itself and importantly

that growth of this scale can be sustainably accessed by public transport to higher order settlements, particularly as Littlebourne does not have a station and is over 2km from Bekesbourne Station.

The proposals in policy R14 and R15 increase the proposed allocation area however also propose significantly greater growth than that refused, increasing numbers from 115 new dwellings to 300. Such a significant amount of growth is likely to generate a need for around 0.5 forms of entry at the primary school and a significant extension to the doctors surgery. The emerging policy does not reflect the needs for school places to be accommodated (is a new school needed on the site? Could the existing school be extended? This isn't clear) , nor that the extension to the doctors surgery is deliverable.

The allocation proposes 300 houses across 8.63Ha, which equates to 35 dwellings per hectare. In addition to this it proposes a minimum of 30 units of older persons accommodation, a shop/café that is located away from the heart of the village and other community facilities that are not stated, further increasing the density of development, number of vehicle movements and amount of growth. This is a density that does not respond to local character and distinctiveness and is more akin to an urban area or urban extension allocation, which is also reflected in the policy wording that requires "Garden City Principles" to be met. The urban form and character of Littlebourne exhibits a graded density that reduces significantly to its rural edges, it is a village and the density and allocation should be on this basis. The allocation should also reflect this local distinctiveness, density and character (as required by the NPPF) and provide far greater buffer areas towards Bekesbourne Lane in particular, where the emerging policies diagram fails to show any buffers at all.

Looking at the policy wording further, the policy identifies the need for an on site WWTW. It appears the numbers of new homes have been driven by the needs of the WWTW (see policy DS17) rather than what is suitable for the site and village itself. Southern Water will be required to upgrade WWTW by 2030, so there is no need for this infrastructure on site nor for an allocation that needs to provide the amount of development to make it viable.

In conclusion, Policies R2, R14 and R15 should be reduced to provide an appropriate level of growth to the village of Littlebourne that corresponds with its position in the settlement hierarchy, the capacity of the existing primary school, its rural location and character, landscape character and setting. A far more gentle approach should be taken to the density of the site, the amount of land to be used for buffers, open space and wildlife.

I would suggest an allocation of around 50 homes would achieve such an outcome, would gain less local objection and would reflect the position of Littlebourne as a historic village within the district settlement hierarchy.

Thank you for taking my comments in to account. I look forward to hearing further from you and hope the above changes can be made to the policy ahead of any further local plan consultation.

Yours sincerely

Emma Quinn