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Planning Inquiry 17 February 2026

Canterbury

Land off The Hill, Littlebourne

CA/23/00484

APP/J2210/W/25/3373183

Appeal by Gladman against the refusal by Canterbury City Council of
outline planning permission for up to 300 residential dwellings

STATEMENT ON BEHALF OF CPRE KENT

By Peter R. Styles

The Kent branch of the Campaign to protect Rural England exists to
protect the beauty, tranquillity and diversity of the Kent countryside

CPRE Kent Queen's Head House, Ashford Road, Charing, Kent TN27 0AD
www.cprekent.org.uk Phone 01233 714540 Email planning@cprekent.org.uk

Registered charity (number 1092012), limited company registered in England (number 4335730)

CPRE Kent statement

17 February 2026

Land off The Hill, Littlebourne

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Public Inquiry into the appeal by Gladman against the refusal by Canterbury City Council of outline planning permission for up to 300 residential dwellings

Introduction and planning history

My name is Peter Styles. I am a member of CPRE Kent and the co-Chair of the Canterbury district group.

We are CPRE, the countryside charity, dedicated to protecting the rural character of large areas of England. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected national organisations working on environmental matters and on sustainable development. We have 40,000 members and supporters living in cities, towns, villages and the countryside.

CPRE Kent is the largest county branch of CPRE The branch represents 1,171 individual and institutional members, including parish councils, local amenity groups and civic societies.

When it comes to building new homes, we believe planning officers and councillors on planning committees should ensure that the adverse impact of development on the countryside is kept to a minimum. This can be achieved by adopting a truly brownfield land first approach, and by ensuring that any plan-led greenfield development is truly sustainable. Although both these objectives accord with national planning policy, it is our experience that planning authorities struggle to fulfil them in practice, including in the Canterbury district.

I have come here today, on behalf of CPRE Kent and the CPRE Canterbury district group, to set out our continuing objections to the proposed development by Gladman adjacent to The Hill in Littlebourne village.

I am mindful that members of the City Council Planning Committee voted decisively at its July 2025 meeting to refuse planning permission, with 10 votes cast against agreeing to the application, none in favour and just two abstentions.

There had furthermore been a prior application by Gladman in 2021 to build 115 houses on a smaller parcel of land in the same location fronting The Hill. That was planning application 21/01675. That application was similarly refused on 30 September 2021. I attach the City Council decision notice as Appendix 2. Grounds for refusal centred on findings that the proposed development would constitute an unsustainable and unplanned urbanisation of the countryside and result in the permanent loss of best and most versatile agricultural land. I submit these findings remain as valid and relevant today as they were four and a half years ago.

The two votes of the Planning Committee in September 2021 and July 2025 conveyed a clear message that the City Council does not believe development at this site stacks up, at least not in the manner presented by the appellant. This Inquiry should particularly keep firmly in mind the City Council's clear, democratically made refusal of the 2023 application in 2025. Not one single councillor voted to approve it. The members of the Planning Committee could see that the scheme before them was not ready. They therefore refused the application for clear, substantive reasons: among them, that the site is not sustainably located in transport terms, the wastewater position is uncertain and risks water pollution, and the scheme does not demonstrate adequate protection for the nearby chalk stream.

We believe the only reasons that the City Council is now not contesting the Gladman appeal are fear of officers spending a lot of time working on it, and apprehension about incurring significant legal expenses.

Summary of original CPRE representations to the City Council in April 2023

CPRE Kent objected in writing in ~~early 2025~~ April 2023 to the Gladman planning application to build 300 homes, not long after it was filed. For completeness, our grounds of objection and comments are appended (Appendix 1). I will quickly summarise a few of the main grounds of objection set out in our written submission to the City Council.

1. The site is unallocated under the Canterbury District Local Plan 2017 and outside the defined built-up area of the city in a village and countryside setting
2. Housing development would have an adverse impact on a designated Landscape Character Area (according to policy LB4 of the Local Plan), given that the site lies within a defined Littlebourne Fruit Belt as described in section H6 of the Canterbury Landscape Character Assessment and Biodiversity Appraisal (2020), The Littlebourne Fruit Belt affords a rural setting to the Littlebourne Conservation Area.
3. The scale of development applied for by Gladman is out of character with the modest rural service centre of Littlebourne, contrary to policy SP4 of the Local Plan.

4. Development would entail loss of best and most versatile agricultural land, contrary to policy EMP12 of the Local Plan.
5. Traffic from the site would produce adverse impacts on the highways network (including a serious impact on designated rural lanes – contrary to policy T16 of the Local Plan)
6. Provision foreseen for drainage and wastewater from the site is not proven to obviate risks of pollution to chalk streams and risks of adding to the nutrient load affecting Stodmarsh wetlands

Material changes in circumstances

CPRE does acknowledge that there have been two material changes in circumstances in recent years up to the present. One is that the City Council has included the appeal site in its proposed greenfield allocations in an emerging revised Local Plan. I come to that matter and related questions of infrastructure adequacy in the next section of my statement.

A second change of circumstance is that the Council is currently not quite able to demonstrate a five-year housing land supply as it could in earlier years. As a consequence, a tilted balance of presumption in favour of sustainable development comes into play. This presumption, however, does not in itself obviate a requirement to attach weight to other material considerations including, for instance, environmental harm ensuing from development in this location. In any case, I shall argue that development of 300 homes on land off The Hill in Littlebourne would overall not qualify as sustainable development.

As to the specific question of sustainability, I will be drawing your attention to the recently dismissed appeal by a developer at to build 140 dwellings in open countryside next to a designated rural service centre in Hamstreet near Ashford – planning reference APP/E2205/W/25/3360094. The written grounds for dismissal are attached at Appendix 3.

Draft revised District Local Plan and cumulative infrastructure inadequacy

I have already mentioned a first change of circumstances in the last couple of years - namely that the appeal site was identified for a greenfield housing site allocation (policy R7) in a version of the City Council's emerging revised Local Plan published for Regulation 18 public consultation in Summer 2024. A further, more recent Local Plan public consultation was carried out in Autumn 2025 but was limited in scope - it presented for public comment *only new and amended policies*.

I now want to explore the intersection of the Gladman appeal against refusal of planning permission in Littlebourne and the inclusion of a similar allocation in the

draft Local Plan. My exploration involves two particular aspects: firstly sewage disposal, secondly transport and highways. Both go the crucial question of sustainability.

Sewage disposal

Rather than an onsite solution as is envisaged by the allocation policy in the emerging Local Plan, the appellant proposes foul wastewater is to be pumped into the existing sewerage system. That is despite Southern Water as statutory undertaker confirming the receiving sewage system in and around Canterbury is currently operating at full capacity. The appellant says the lack of capacity is *“not a matter which should prevent planning permission being granted”* and that permission would give the statutory undertaker *“clear direction”* to make capacity available.

CPRE is aware that in written responses to the City Council's 2025 consultation on the draft Local Plan Southern Water, the Environment Agency, Natural England and Kent County Council propose reliance by the planning authority on an envisaged upgrade of the Sturry Road sewage treatment works by 2030. But CPRE is also aware that more than half the water quality monitoring stations along the Stour, including the three closest to the treatment works are not in operation. Furthermore, there is a recent history in Canterbury district of planned infrastructure upgrades and repairs being delayed and completed, if at all, woefully late. We note that a new City Council draft of an Infrastructure Strategy to accompany the emerging Local Plan is still pending.

The envisaged Southern Water upgrade to the sewage treatment plant is, indeed, exactly the type of infrastructure improvement matter which the Local Plan process is meant to co-ordinate. Furthermore, this example undermines the appellant's argument that this site must be released now to deliver homes quickly. If occupation is effectively dependent on a third-party upgrade not intended for implementation before 2030, and susceptible to significant delay, then *obviously “early delivery”* of homes cannot be guaranteed.

To address the current uncertainty, the City Council is suggesting (see its Statement of Case, Appendix 3, condition 15) that a condition should be applied to a grant of planning permission to Gladman, to ensure that the proposed means of sewage disposal be submitted to and approved in writing and be carried out in accordance with approved details. We submit that “kicking the can down the road” in this manner on a crucial matter of infrastructure provision and associated environmental impact is unacceptable planning practice, given the imminent opportunity for the City Council to consult on a definitive and comprehensive approach to wastewater disposal and treatment in the emerging Local Plan. (A Regulation 19 public consultation on a final draft of the revised Plan is expected within a couple of months from now.)

Transport and highways

CPRE is highly concerned that allowing the proposed development, in advance of the consideration of all relevant issues within the emerging Local Plan, will contribute significantly to increasing traffic chaos towards the centre of Canterbury. Of special note is the inevitable exacerbation of congestion on the road network where the A257 feeds into the A2050 and the Canterbury ring road. This exacerbation will be yet worse when further traffic is generated from additional site allocations on the east side of Canterbury, as foreseen in the draft Local Plan. Woefully insufficient mitigation is being sought from the appellant by the City Council to match the number of additional vehicle trips along the A257 and Bekesbourne Lane likely to be associated with so many additional homes in Littlebourne.

The appeal site is 2km from the nearest train station. It will be impossible to safely travel along Bekesbourne Lane (which leads to the station) on foot or by bicycle. There is no bus service that connects Littlebourne to Bekesbourne Station. Rail services are not sufficiently frequent to lend weight to the supposed sustainability credentials of the appeal site.

Bus services from Littlebourne to Canterbury (route 43) are limited. Services are unreliable and slow, owing to congestion on the way into and out of Canterbury between St Martin's Hill and the bus station. In addition, services are at risk if Stagecoach decides to reduce frequency from two to one per hour, as it has recently done in the case of route 17 through the village of Bridge.

Additional vehicle movements to and from the site would add to congestion on the A257, impacting travel to and from the city.

The difficulty of reaching Canterbury by bicycle should not be underestimated. There are no streetlights between Littlebourne and the Polo Farm and no cycle lane until after Barton Court School on Longport.

The description of the site allocation in the emerging draft Local Plan makes it clear that this site is only acceptable if it delivers safe, convenient walking and cycling — including improved accessibility to Bekesbourne railway station, alongside targeted highways improvements and junction work along the A257. Yet the appellant's Travel Plan largely relies on claims of proximity to facilities and active travel "encouragement" measures.

The Council has failed to secure any transport and highways related mitigation (beyond the immediate area around the site within the village of Littlebourne, and other than an electric car sharing scheme), in spite of the inadequacy of public transport and existing congestion along the A257. Such failure is highlighted by the extensive mitigation anticipated to be required from developers of the East Canterbury allocation in the latest consultation draft of the Local Plan. That mitigation would include a new Park and Ride facility somewhere off the A257, a fast bus

service running from the east through new bus gates leading to Spring Lane and a link road via a new bridge across the railway between the foreseen East Canterbury sites and the so-called South Canterbury urban extension (previously known as Mountfield Park.

Intersection of the appeal with the emerging Local Plan – in summary

CPRE is of the firm view that consideration of the merits of residential development on the appeal site should be left to the Local Plan process. That process necessarily entails a proper, strategic approach to infrastructure provision. Allowing this appeal would not be the 'quick fix' to the housing crisis that the appellant and the Council seem to think it is.

Further observations on the non-sustainable location of the appeal site

We note that the minutes of the Case Management Conference for this Inquiry (CMC, held 14 November 2025) confirm that the Council was asked to provide "specific reasoning relating to the recent decision to not defend the reasons for refusal," and that it "should immediately write to all interested parties explaining its changed position and that it will no longer be defending any of the reasons for refusal."

The Council's letter to interested parties cannot be said to provide the "specific reasoning" that, you (the Inspector) asked for. It is not made clear why the Council's position has changed following the decisive decision by the Planning Committee to refuse outline planning permission.

Not only does the Council's letter to interested parties not explain the Council's position in terms of not defending this appeal, but its Statement of Case fails to provide all the assurances sought by the Inspector in the minutes of the CMC. Distances to local services are provided, but without setting them in the real, lived-in, context of the area. The City Council's Committee report, its Statement of Case and the agreed Statement of Common Ground between the appellant and the Council do not accurately describe the application site and its surroundings. Aspects of supposed ease of active travel and of access to services are glossed over or misleadingly described. We set out at Appendix 4 to this statement some examples of such aspects. The Appendix focuses particularly on conditions on the ground in Littlebourne, which make access to local facilities on foot from the south side of The Hill problematic, as well as on the many types of service and facility which are effectively unreachable by active means of travel and only with difficulty by bus.

On the important issue of sustainable location, I would respectfully like to draw your attention to an appeal that was dismissed on 3 November 2025 for 140 dwellings at Hamstreet, Ashford – APP/E2205/W/25/3360094 – on the grounds that the appeal site was not suitably located. This appeal decision is appended (Appendix 3).

As in the case of this appeal, Hamstreet is designated as a rural service centre, where the principle of residential development would have been consistent with the Council's spatial strategy. The Inspector declared at paragraph 4 of her findings that "... [the proposed site] would not actually be within the settlement of Hamstreet, but it would be next to it in the open countryside."

The Inspector also noted that the Hamstreet appeal site was walkable to local services. However, at paragraphs 12 and 13 she did take the time to explore the ease with which nearby services and facilities could be accessed. In particular, she noted: "... whilst crossing roads is normal, it would be a bit of an inconvenience that there would be no continuous footpath on the appeal side of the road."

Paragraph 17 sets out the Inspector's conclusions in terms of narrow pavements (akin to the pinch points along School Path in Littlebourne), stating "... I noticed that much of the route was along narrow pavements, which would create added difficulty and time to the route if walking with children or buggies, especially when passing others."

At paragraph 18 the Inspector acknowledges "... that some journeys will be taken by car no matter how short the distance ... Nevertheless, I consider that not enough of the facilities would be within "easy" walking distance for all new residents."

At paragraph 20 the Inspector concludes "... the site is not a suitable location for development" and states granting consent would conflict with Local Plan policies. "In combination, these policies seek to ensure that development is focussed in accessible and sustainable locations, [and to] encourage as much non-car-based travel as possible ..."

Despite Ashford Borough Council not being able to demonstrate a five year housing land supply (paragraph 41), in concluding on matters with regard to the planning balance (and the tilted balance) the Inspector states at paragraph 74 that "... there are a variety of benefits to the scheme, however the adverse impacts of granting planning permission would significantly and demonstrably outweigh these benefits, when assessed against the policies in the Framework taken as a whole."

I submit that the adverse impacts noted by the Inspector in the Hamstreet case display many parallels with the site the subject of the Gladman appeal. This is especially so in terms of the "ease" (or not!) with which services and facilities could practicably be reached by residents without resorting to car journeys.

Overall conclusion

To conclude, CPRE Kent respectfully requests that this appeal be dismissed for the reasons I have explained. My case in summary is that construction and occupation of the large volume of housing applied for in this countryside location would not constitute sustainable development. The question of whether sustainable solutions could be found, pursuant to any similar allocation in the emerging Local Plan, is a matter for the City Council or its successor unitary authority to determine at a future date. I submit that such solutions will depend on certainty about the commissioning of new infrastructure, the introduction of measures to facilitate modal shift, and the assent of a developer to more substantial mitigation than Gladman seem prepared to tolerate.

Finally, I reiterate that members of the City Council Planning Committee did understand that the appeal site now features in the draft revised Local Plan as a proposed allocation. They nonetheless refused the application, because they could see that the scheme in front of them fell well short of their own aspirations in the emerging Plan.

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Appendix 1: CPRE Kent comments, April 2023

Public Inquiry 17 February 2026

Appeal against the refusal of outline planning permission for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation.

All matters reserved.

Land off The Hill, Littlebourne

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The countryside charity Kent

Application: CA/23/00484

Proposal: Outline planning application for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation. All matters reserved except for access. | Land At The Hill Bekesbourne Lane East Of Bekesbourne Hill Bekesbourne Canterbury CT4 5EA

We are CPRE, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches with over 1,300 members, including over 160 parish councils, civic societies and other Kent organisations and companies.

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside.

We believe that the planning system is a toolbox for achieving better – for people, nature and the economy – while supporting the delivery of more badly-needed homes to end the housing crisis.

Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that plan led development is sustainable and in accordance with national planning policy.

We therefore strongly object to this application on the following grounds:

1. Building in the countryside

The Site is located outside of the current settlement area of Littlebourne in open countryside. It is not identified on the Adopted Local Plan Proposals Map as allocated for development and does not fall within one of the 'exceptions' criteria listed in policy HD4 (New Dwellings in the Countryside) of the Adopted Local Plan (2017), as suitable for new dwellings. Policy HD4 of the adopted Local Plan 2017 identifies exceptional circumstances in which new dwellings will be permitted in the countryside and none of these apply in this case.

Policy LB4 Landscape Character Areas of the Adopted Local Plan 2017 says that consideration must be given to landscape character and states the following: "Proposals for development, and associated land use change or land management, should demonstrate that they are informed by, and sympathetic to, the landscape character of the locality. In considering development proposals, the Council will take every opportunity to reinforce, restore, conserve or improve, as appropriate, the landscape character of the area in which development is proposed."

But Canterbury City Council's Landscape Character and Biodiversity Appraisal classifies this proposed development site as lying in the Littlebourne Fruit Belt (H6), which it describes as providing a rural setting to the historic buildings of Littlebourne's Conservation Area. It

CPRE Kent - The Countryside Charity

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recommends that planners “conserve the rural character of the landscape ensuring that it continues to play a role in ...the separation of Bekesbourne / Patribourne and Littlebourne. Thus, this development is contrary to Policy HD4 and LB4 of the Adopted Local Plan and should be rejected.

2. Inappropriate scale

Policy SP4 (Strategic approach to location of development) of the Adopted Local Plan (2017) aims to focus development in existing urban areas.

It says that: “Provision of new housing that is of a size, design, scale, character and location appropriate to the character and built form of the rural service centres of Sturry and the local centres of Barham, Blean, Bridge, Chartham, Hersden and Littlebourne will be supported provided that such proposals are not in conflict with other local plan policies relating to transport, environmental and flood zone protection and design, and those of the Kent Downs AONB Management Plan, where applicable; In the open countryside, development will be permitted if required for agriculture and forestry purposes.”

The application site comprises agricultural land outside the built confines of the village in the countryside and so does not comply with policy SP4.

This application CA/23/00484 is also not of an appropriate scale for Littlebourne. Three hundred new dwellings will mean a massive expansion of a village of around 1,500 residents. Therefore, the proposed development does not comply with the aims and objectives of policies SP4 of the Adopted Local Plan 2017 and should be rejected.

3. Draft Local Plan 2045

The applicant points out that site has been included in the Reg 18 Local Plan (October 2022) as site R15. However, this is only at the Reg 18 consultation stage. The emerging local plan is at such an early stage that it does not have sufficient weight to influence the planning process. To grant permission for CA/23/00484 would undermine the plan-making process by predetermining decisions about the scale, location and phasing of new development that is central to the Reg 18 Local Plan.

4. Loss of Best and Most Versatile agricultural land

This site is Grade 1 agricultural farmland, the very best and most versatile land in the UK. The selection of this site is at odds with NPPF paragraph 174(b) which says that planning policies should recognise “the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.”

Policy EMP12 (Agricultural Land) of the Adopted Local Plan (2017) says that “The City Council will seek to protect the best and most versatile farmland for the longer term. Where significant development of unallocated agricultural land is demonstrated to be necessary to meet a housing, business or community need, planning permission may be granted on best and most versatile land if a suitable site within the urban area or on poorer quality land cannot be identified.”

CPRE strongly believes that the development of BMV agricultural land should be avoided. We strongly object to this application which runs contrary to the CPRE’s development policy of brownfield first.

5. **Cumulative impact**

This development would also have a cumulative impact with the other development in and around Littlebourne.

6. **Housing Need** The CPRE, and others, have made very strong objection to the overall housing numbers and have called for them to be revisited.

The Government's DLUHC proposed changes to the NPPF were set out in the consultation draft of 22nd December 2022. This includes significant and specific changes that are being proposed to immediately make to the NPPF (subject to and following consultation). The intention is for these specific changes to take effect Spring 2023. Amongst the purported aims of the changes are to:

- make clear how housing figures should be derived and applied so that communities can respond to local circumstances;
- address issues in the operation of the housing delivery and land supply tests;
- make sure that food security considerations are factored into planning decisions that affect farmland;
- Changing the test of Soundness at Paragraph 35 in a manner which would give far greater scope for strategies which do not necessarily meet the standard method housing requirements;
- Inserting an entirely new paragraph confirms that "standard method is an **advisory** starting-point".

Additionally, the consultation material accompanying the proposed revised NPPF suggests that a university town with an above-average proportion of students would be an example of a local demographic characteristic which may justify using an alternative to the standard method. Canterbury has one of the highest ratios of students to permanent residents in England, at 16.4%, compared to a national average of 6%.

For these reasons, CPRE has already advised CCC that it must update its Housing Needs Assessment, drawing on the most up-to-date evidence. This includes the 2018 based household projections, 2020 based population projections and recent 2021 census releases (which now includes up-to date student and home ownership details). From this, should set a realistic housing need figure based upon the most up-to-date household projections alone, focusing on a figure which is deliverable and sustainable, rather than blindly seeking to meet an arbitrary and artificial uplift.

If a realistic housing need figure was set, it would be perfectly clear that this development is not needed to meet genuine local housing need.

It is also our view the arguments being put forward by the applicant with respect to CCC's five years supply are overstated. Firstly, the applicant is a site promoter, not a housebuilder. There is therefore no certainty that this site would be developed any time soon, particularly in view of the recent housing permissions already granted within the locality and the potential for market saturation this may bring, along with the national slowdown in housebuilding we are currently seeing. Accordingly, there is no certainty that this site would contribute to the housing supply in the short to medium and therefore urge a lesser weight be given to purported housing benefit on this basis.

Secondly, the applicant seems to be making the argument that the Stodmarsh Nutrient Neutrality issue which is stalling the grant of permission on allocated sites elsewhere in

the district means that this development should be permitted on this unallocated site. However, the proposed site is also with the Stour catchment area so also caught by the Nutrient Neutrality issue and as set out below, there is no certainty that their vague onsite WwTW solution will meet the threshold to pass the HRA Appropriate Assessment.

Thirdly, the applicant seems to be making the argument additional weight should be given to a policy compliant provision of affordable housing. Clearly the provision of 30% affordable housing should be considered routine rather than anything additional. In any event, it is noted that the applicant is not making any firm commitment with respect to the mix of affordable housing that is to be provided or specifically whether the level of Social Rent that is to be provided. As a minimum, we would expect this to reflect the current identified mix as set out within Policy DS2 of the emerging plan.

7. Traffic

This development breaches DBE3 (Principles of Design) part n) of the Adopted Local Plan (2017) which says development will only be permitted if it “does not have a detrimental effect on the highway network in terms of congestion, road safety and air quality”. Whilst we will await the comment of KCC Highways with interest, we note KCC PROW and Access have already raised concerns regarding the impact of the proposed development on the local rural Highway network and NMU.

8. Loss of hedgerows

While the Design and Access statement says that hedgerows will be retained “where possible”, the block plan appears to show that large sections of hedgerow would be removed under this proposal.

Policy DBE3 (Principles of Design) of the Adopted Local Plan 2017 says that “The distinctive character, diversity and quality of the Canterbury District will be promoted, protected and enhanced through high quality, sustainable inclusive design, which reinforces and positively contributes to its local context creating attractive, inspiring and safe places. Proposals for the development, which are of a high-quality design, will be granted planning permission having regard to other plan policies and the following considerations: a. The character, setting and context of the site and the way the development is integrated into the landscape; b. The conservation, integration, extension, connection and management of existing natural and historic features including trees, hedgerows, pathways and boundaries to strengthen local distinctiveness, character, habitats and biodiversity;”

Policy T16 (Rural Lanes) of the Adopted Local Plan 2017 says that “rural lanes which are of landscape amenity, nature conservation, historic or archaeological importance will be protected from changes and management practises which would damage their character, and where possible be enhanced.”

Bekesbourne Lane is such a rural land and its character would be damaged by this development.

9. Lighting

Policy DBE9 (Outdoor Lighting) of the Adopted Local Plan 2017 says that proposals for new outdoor lighting or new developments which include outdoor lighting will only be permitted where it can be demonstrated that: a. It has been designed to minimise light glare, light trespass, light spillage and sky glare through using the best available technology to minimise light pollution and conserve energy. b. It does not adversely impact residential amenity; c. It does not adversely affect sites of nature conservation interest and/or protected and other

vulnerable species and heritage assets; d. It does not adversely impact on protected landscapes or those areas where dark skies are an important part of the nocturnal landscape; e. The lighting levels do not exceed the levels recommended by the ILE in the relevant environmental zone as set out in Appendix 5; f. It does not have an adverse impact on long distance views or from vantage points.

NPPF 185(c) requires planning policies to limit the impact of light pollution on intrinsically dark landscapes and nature conservation, and to limit the impact of light pollution from artificial light on local amenity.

CPRE has long been a leading voice in the campaign against light pollution. We have a special interest in this issue: darkness at night is one of the key characteristics of rural areas and represents a major difference between what is rural and what is urban.

Seven species of bats have been found near to the development site, including Soprano Pipistrelle, a national Priority Species.

10. Flooding

This development will increase the flood risk for the area. Flooding during the winter of 2000 and spring of 2001 occurred across the district from rivers and non-main rivers overtopping their banks.

Much flooding occurred as a result of surface water sewers and road drains not being able to cope with the amount of water, particularly in the rural areas, high water tables, unmaintained minor watercourses and significant run-off from open fields, and in some instances from foul sewers and old springs.

In winter 2013 and spring 2014 severe flooding occurred along the Nailbourne, Little Stour and Petham Bourne plus rural areas of the Great Stour and was principally due to very high groundwater levels and emergent springs. Problems with groundwater infiltration into foul sewers along the Nailbourne resulted in sewer surcharging adding to the effects of flooding. Climate change is likely to make these flooding events more commonplace in the future.

This development, which will convert large areas of green fields to hard surfaces, will make this problem worse.

11. Drainage

The developer is proposing that surface water runoff be discharged into an existing watercourse at the north eastern boundary of the site. This watercourse is connected into a 225mm pipe that is presumed to flow through Littlebourne and eventually into the Nailbourne. The Nailbourne is designated as a chalk stream and therefore carries significant ecological value, in part due to the scarcity of these features as there are only around 200 in the world. Whilst the developer has outlined some mitigation measures, there is still concern that the waters resulting from this development will have a damaging on this important an rare stream.

The development of a greenfield site to hard impermeable surfaces will also increase run-off directly into the river, threatening further pollution and environmental damage.

12. Stodmarsh Nutrient Neutrality

We note the applicant is proposing a bespoke onsite Wastewater treatment system as its mitigation strategy with respect to overcoming the Stodmarsh Nutrient Neutrality Issue. This will involve treating the sewage produced by the development through an aerated reed bed

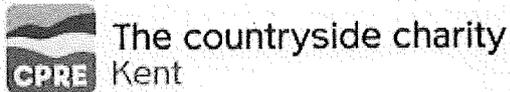
system which will then discharge of treated sewage directly into the Nailbourne, a tributary of the Little Stour.

Whilst we will await the comments of Natural England on the acceptability of this, at this stage there clearly is insufficient information for CCC as competent authority to conclude this solution is appropriate and can be achieved. The proposal put forward by ARM is in very basic outline only and contains no commitment from Severn Trent to operate the scheme. There is also no certainty the Environment Agency would grant the necessary environmental licences for the wastewater discharge permit for the onsite WwTW plant

It is our view that, for the above reasons and notwithstanding the presumption in favour being applied, that the proposal remains contrary to the development plan as a whole and therefore should be refused.

Yours sincerely

Canterbury committee – CPRE Kent



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Appendix 2: decision notice CA/21/01657

Public Inquiry 17 February 2026

Appeal against the refusal of outline planning permission for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation.

All matters reserved.

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CA/23/00484

APP/J2210/W/25/3373183

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

CPRE Kent Queen's Head House, Ashford Road, Charing, Kent TN27 0AD
www.cprekent.org.uk Phone 01233 714540 Email planning@cprekent.org.uk

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CANTERBURY CITY COUNCIL

DECISION NOTICE

Correspondence Address:
Gladmans Developments
Gladman Developments Ltd

Town and Country Planning Act 1990
Town and Country Planning (Development Management Procedure) (England) Order 2015

NOTIFICATION OF REFUSAL OF OUTLINE PLANNING PERMISSION

Application Number: CA/21/01657
Location: Land At The Hill, Littlebourne, Canterbury, Kent
Proposal: Outline planning application for up to 115 residential dwellings (including affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation. All matters reserved except for access.

Take notice that **Canterbury City Council**, the district planning authority under the Town and Country Planning Act 1990, has **REFUSED** your application, as described above, subject to the following reasons:

- 1 The proposed development is located outside of any settlement and is not identified as suitable for residential development within the Canterbury District Local Plan 2017 and as such, if allowed, would result in an unsustainable, unplanned urbanisation of the countryside, and the permanent loss of best and most versatile agricultural land. The proposed development is therefore contrary to policies SP1, SP4, HD4, EMP12 and DBE3 of the Canterbury District Local Plan 2017 and the National Planning Policy Framework.
- 2 The proposed development would result in less than substantial harm to the setting of designated heritage assets which is not outweighed by any public benefit, contrary to policies HE1, HE4 and HE6 of the Canterbury District Local Plan 2017 and the National Planning Policy Framework.
- 3 Insufficient ecological survey information has been submitted to enable the local planning authority to adequately assess the ecological impacts of the proposal and the effectiveness of mitigation proposals, with particular reference to bats, dormouse and reptiles. There is also insufficient assessment as to the potential adverse impacts of the development on the Little Stour chalk river priority habitat and no assessment as to the potential polluting impacts of surface water from the development on the Littlebourne Stream Local Wildlife Site and the mitigation that would be required to offset such an impact. The proposed development is therefore contrary to policies LB7, LB9 and LB13 of the Canterbury District Local Plan 2017 and the National Planning Policy Framework.

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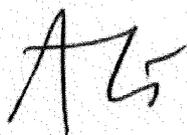
- 4 The proposed development would cause a likely harmful significant impact on the Stodmarsh SAC, SPA and Ramsar and without appropriate mitigation it would fail the Appropriate Assessment required by the Habitat Regulations. The proposal is also in conflict with the National Planning Policy Framework and policies SP1 and LB5 of the Canterbury District Local Plan 2017.
- 5 The applicant has failed to secure the required levels of affordable housing to meet local needs contrary to policy HD2 of the Canterbury District Local Plan 2017 and the National Planning Policy Framework.
- 6 The applicant has failed to demonstrate that the highways network, particularly at key junctions along the A257, has the capacity to accommodate the proposed development. Without such assessment it is not possible to conclude that the proposal would not unacceptably impact highways safety. The applicant has also failed to adequately demonstrate that access for the emergency services can be safely accommodated within the layout. The proposal is therefore in conflict with policy DBE3 of the Canterbury District Local Plan 2017.
- 7 The applicant has failed to demonstrate that receiving waters outside of the site have the capacity to accommodate the flow of surface water from the site, and as such it cannot be concluded that the proposal would not contribute to flood risk off site and would not exacerbate any existing flood risk in the locality. The proposed development is therefore in conflict with policy CC11 of the Canterbury District Local Plan 2017.
- 8 No Sustainability Statement has been submitted with the proposal, and as such the applicant has failed to demonstrate how the proposal has responded to the objectives of sustainable development and how it has had regard to the measures outlined in table D1 of the Plan, in conflict with policy DBE1 of the Canterbury District Local Plan 2017.

This application relates only to that required under the Town and Country Planning Acts and does not include any consent or approval under any other enactment or under the Building Regulations. Any other consent or approval which is necessary must be obtained from the appropriate authority.

The application was processed having regard to the National Planning Policy Framework, which requires that where there are potential solutions to problems arising in relation to dealing with planning applications, the council will work with the applicant in a positive and proactive manner to seek solutions to those problems.

NOTES TO APPLICANT:

None



Andrew Gambrill
Authorised Signatory of the Council
Date of issue: 30 September 2021

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Appeals to the Secretary of State

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

Appeal Type	Timescale
Householder application	Within 12 weeks of the date of the notice
Minor commercial application	Within 12 weeks of the date of the notice
Express consent for the display of an advertisement	Within 8 weeks of the date of receipt of the notice
Tree Preservation Orders	Within 28 days of the date of the notice
Planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice	Within 28 days of the date of the notice
If an enforcement notice is served relating to the same or substantially the same land and development as in your application.	Within 28 days of the date of service of the enforcement notice, or within 6 months [12 weeks in the case of a householder appeal] of the date of this notice, whichever period expires earlier
All others	Within 6 months of the date of the notice

Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN (Tel: 0303 444 5000) or online at <https://acp.planninginspectorate.gov.uk>

The Secretary of State can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal. Further details are on GOV.UK.

IMPORTANT NOTES

Notification of permission under the Planning Acts does NOT convey consent under The Building Regulations

1. The development to which the attached planning permission relates may also require a separate approval under the Building Regulations.
2. If the planning permission refers to amended plans, any necessary Building Regulations approval should also cover those amendments.
3. If the development involves any demolition work, notice of this this may be required under the Building Act 1984.

Advice on each of the above is available from STG Building Control Partnership on 01634 331133 or by email building@stgbc.org.uk

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Appendix 4

Non-sustainability of the appeal site

Details missing or glossed over in descriptions of the site and access to services, as set out the City Council's Committee report, the appellant's Statement of Case and the agreed Statement of Common Ground between the appellant and the Council

Context

At paragraph 22 of the Committee report it is claimed that while the application site lies outside the settlement boundary, it is not isolated and it lies adjacent to a designated rural "service centre". We note the following related claims in the appellant's Statement of Case and/ or in the Statement of Common Ground agreed between the appellant and the City Council:

- Distance to the village shop is 220m, distances to the GP surgery and the primary school are both 600m – paragraph 2.1.8 of the Statement of Common Ground.
- Bekesbourne railway station is about 2km away – paragraph 4.14.7 of the Statement of Common Ground.
- The number 43 bus provides a half hourly service towards Canterbury to the west and Sandwich to the east.

While none of these statements is incorrect, they give a false impression of the ease of reaching relevant services by sustainable means, given actual conditions on the ground.

Physical challenges and impediments

The appeal site fronts the A257, which is the main road between Canterbury and Sandwich. It then wraps around the edge of the village having a second frontage onto Bekesbourne Lane. Beyond the appeal site (at the top of The Hill on the Canterbury side of the site proceeding eastwards), the A257 bends to the left. This, in addition to parked cars using the marked bays outside dwellings on The Hill makes visibility difficult for pedestrians attempting to cross the main road from Jubilee Road to the public right of way (CB156), which is known as School Path. School Path links the A257 to Bekesbourne Lane. It is a hard surfaced route between the back gardens of the properties on Rose Acre Road and land to the

west. The hard surfacing is not a consistent width. The path has pinch points, which makes two-way travel (especially if walking with a pushchair, trike or scooter) difficult.

We ask that when you (the Inspector) visit the appeal site, you walk this path. In addition, we would draw your attention to the change in levels between the application site and the A257. The dwellings on the south-western side of The Hill are set above the road, with their driveways cut through the bank fronting the A257. Because of the lie of the land, significant engineering works would be required to provide vehicular access onto the A257. This would be in addition to the substantial loss of the striking tree/hedgerow boundary that fronts the road.

A particular feature of the village is that pavements along key routes (that is, the A257 and along Bekesbourne Lane) are sparse and unconnected. This means that while the distance to the primary school, village shop and GP surgery are within a theoretical easy walking distance, getting to them without resorting to using your car is hazardous. There is a footpath into the village centre on the north-eastern side of the A257 (on the other side of the road to the appeal site). However, from the Rose Acre Road bus stop on the other side of the road there is no pavement linking the appeal site to the village centre.

This means that if, for instance, you want to catch a bus into Canterbury and find it easiest to walk along School Path to reach the High Street, you need to cross over the A257; walk a short distance down the pavement and then re-cross the road to get to the bus stop. There is no pavement linking School Path to the Rose Acre Road bus stop. Similarly, if you want to catch the bus into Canterbury from the top end of The Hill (from the direction of School Path), you need to cross the A257 walk up The Hill and then re-cross the road to reach that bus stop.

We note from the appellant's indicative layout of the site that there would be a footpath that meanders behind the substantial hedge alongside the A257. It should be borne in mind that reaching this second bus stop requires an uphill walk, behind a tall hedge (which is likely to put off people using this route on personal safety grounds). Currently, local residents have to do a lot of pavements hopping to get safely to where they want to go – although the distances involved aren't unreasonable, you do put yourself at risk each time you cross the road. To be clear. There is no pavement on the south-western side of the A257 between the two bus stops on the appeal site side of the road.

To make the appeal site reasonably accessible on foot, the appellant would need to make provision for a pavement across the front of the site. This would need to address the change in levels between the site and the A257 and would presumably result in the total loss of the locally distinctive frontage planting. Even then, the pavement connection would be incomplete. There would be a gap in coverage between the Rose Acre Road bus stop and across the front of the dwellings along the road on the south-western side of the A257. From the appeal site you'd still need

to cross the road to get to the village shop and then cross back over the road again to get to the Rose Acre Wood bus stop.

How full a range of services is really available in or near this rural "service centre"?

Reference has been made by the Council and the appellant to the village primary school, village shop and GP surgery. We note that available secondary schools are all in the city of Canterbury, however. The nearest, Barton Manor and Barton Court, are some five kilometres away, others six or seven kilometres. The village shop stocks a small range of convenience foods and drinks, but no fresh meat and very little fresh fruit or vegetables. No details are provided by the appellant about access to other day to day services and facilities that would enable future residents to live a more sustainable (and less car-dependant) life. Where, for example, are the nearest supermarket, dentist, hairdresser, pharmacy, café, gym or vet? We reckon also at least six kilometres away.

If most services are not available within the village, could future residents rely on a fast, reliable bus service that gets them to where they want to be on time and unruffled, and back home again? The only bus route passing through Littlebourne is the Stagecoach number 43. Although according to its timetable it runs every half hour in each direction, the buses serving the route are subject to frequent delays owing to congestion on the approaches into and out of the city of Canterbury, namely down St Martins Hill and along Longport, onto Lower Chantry Lane and then St Georges Place, before reaching the ring road and finally the bus station.

The appellant has sought to demonstrate the transport related sustainability of the appeal site by reference also to the proximity of Bekesbourne railway station (providing hourly services to Dover and to London via Canterbury), which is about two kilometres from the site along Bekesbourne Lane. But the question is: how could future residents possibly travel to the station by sustainable means?

If you haven't done so already you (the Inspector) should drive the route to the station. Although speed is theoretically restricted to 40mph, Bekesbourne Lane is a fast country road. It should be noted that, with the exception of a short run of pavement outside a group of houses near Howletts Zoo, there are no designated footpaths, nor other public rights of way, nor pavements linking the Bekesbourne railway station with Littlebourne. The route does not benefit from any street lighting. So, neither cycling nor walking this route are options which most people would readily consider in summer, let alone in the winter months.

Another question about use of Bekesbourne station is the length of time slow trains take to reach London Victoria via Canterbury East. Normal journey times are in excess of one and a half hours. Sometimes it is necessary to change trains in Faversham or Rochester. These journey times compare with some 55 minutes from Canterbury West to St Pancras. Thus, the vast majority of longer distance rail travel

embarked upon by residents in the vicinity of Canterbury is from and back to Canterbury West. That station is more than seven kilometres from Littlebourne by road.

We reiterate: apparent proximity to a restricted range of services and facilities does not in and of itself render a development sustainable.