

I am grateful to the inspector for the opportunity to speak today.

My name is Henry Boucher and I live in Littlebourne. I am speaking as an Interested Person on behalf of Littlebourne Parish Council. The Parish Council invites you to dismiss this appeal.

I authored a paper on transport issues that you will have in your core documents. I commend it to you and will not repeat it here. Instead my aim today is to further assist in your determination by drawing attention to five Relevant Matters¹ -

1. the unsuitability of this site for affordable housing;
2. the lack of access for people with disabilities;
3. access to the site;
4. the A257 / Bekesbourne Lane / Nargate Street crossroad and highway safety; and
5. the tilted balance.

1. Affordable Housing

A key benefit claimed by the Appellant and the City Council is the scale of affordable housing. However, it undermines the purpose of constructing affordable housing if it is placed in an isolated area, where those who need to access employment, further education and healthcare opportunities the most are not able to do so.

I have long experience from working with a large charity dedicated to tackling poverty and which operates as a major social rent landlord. This work has shown me the long-term problems that can be created when inadequate planning leads to social rent tenants being isolated from the resources they need to thrive.

I am sure you will be aware that this group typically faces significant employment constraints: lower qualifications, higher rates of single parenthood, and disability - around half of social rented households include a disabled person. These factors reduce flexibility, confidence

¹ Procedural Guide: Planning appeals – England - GOV.UK para 7.3.2

and time for work, often leading to insecure employment and antisocial hours. Social rent tenants also have limited choice over where they live, frequently separating them from family and support networks.

A vision-led approach under Framework paragraph 109 should therefore give far greater weight to the logistical realities of affordable housing than is evident here. Fewer than half of social renters own a car (46%²), making access to reliable public transport essential. Bodies such as the Resolution Foundation argue that affordable housing should be located close to city centres.

By contrast, this site is car-dependent, contrary to paragraph 110. There are no significant employment opportunities within walking or safe cycling distance, and evening bus services are extremely limited, with only two services after 7:18 pm and a last return from Canterbury at 10:40 pm. This timetable cannot support many common late-shift occupations.

Based on the proposed housing mix and car ownership rates, 61 households - around 150 people - would be wholly dependent on buses for employment and access to services such as supermarkets, further education and leisure facilities. 150 people would fill two double decker buses. As has already been noted, peak-time buses are already often full, with no commitment to increased capacity for at least a decade.

The Statement of Common Ground identifies a significant need for affordable housing in Canterbury. Locating this development 3.5 miles outside the city does not meet that need. Far from being a benefit, this represents an avoidable and very significant harm.

2. Disability access

Turning to disability access, 20% of homes must meet the Regulation M4(2) standards for accessibility and adaptable dwellings and 10% are for older people. Even on conservative assumptions, this means at least 60 households with a disabled member, including around 24 people with mobility impairments, based on proportions from the Department for Work & Pensions family resources survey³.

² DFT

³ 41% mobility [Challenges faced by people with disabilities - House of Lords Library](#)

KCC Highways advised in their letter to the City Council of 16th August 2023 that traffic on the A257 is too heavy for informal crossing and therefore required a controlled puffin crossing. As School Path, CB156, ends at an uncontrolled crossing of the A257, there are no other safe walking and wheeling exits from the site except the puffin.

However, just the other side of the puffin crossing the footways are too narrow for wheelchair use. DfT guidance requires a minimum width of 1500mm, yet this is the maximum width all along The Hill to the East of the crossing, with cars parked on the pavement reducing the width to under 1000mm in places. The pavement along the whole length of Jubilee Road to the primary school is 1500mm or less and the width of PROW CB143 is less than 1250mm for a length of 17 metres.

This bottleneck lies outside the site, cannot be mitigated, and prevents safe access for disabled residents, parents with pushchairs and some older people. It is a clear breach of Framework paragraphs 117 and 115, the Disability Discrimination Act and the Disability Equality Duty, and must be given very significant weight as a planning harm.

3. Access

Vehicular access also fails, despite the Statement of Common Ground claiming it can be achieved in principle. In its letter of 16 August 2023, KCC Highways noted the geometric drawings submitted but asked for The Hill junction dimensions to be widened. However, the key issue missed is not the dimensions but the position of the site junction. The submitted drawings failed to identify the unadopted road along the eastern boundary, which serves four houses and a business and has its own junction with the A257. This is not a farm track but a road with a junction, and that changes the safety parameters.

Applying the Kent Design Guide junction-staggering requirements, the site access cannot be accommodated between this road junction and Wenderton Way. The available distance is insufficient for a local distributor road. Even allowing significant flexibility, the narrow A257 carriageway, negligible verges, speed-control features and the presence of a puffin crossing mean the design cannot meet the Guide's requirements. Vehicular access is fundamental to the site and cannot be left to reserved matters.

Access for non-motorised users is also fundamental to the site. KCC PROW & Access warned of the danger to non-motorised users (referred to as NMU) on Bekesbourne Lane and rural roads. I have already referred to KCC Highways advice that traffic on the A257 is too heavy for informal pedestrian crossing and the challenges of wheeling. 75% of children aged 5-10 own a bicycle yet will not be able to safely leave the site. There are no walking paths or cycle ways available West to Canterbury from Littlebourne or East to Wingham and beyond.

The failure to demonstrate suitable access is a clear breach of Framework paragraph 115.

4. The Littlebourne crossroads and highway safety

Safety on the A257 has long been a concern. In 2021 planning permission was refused because the applicant failed to demonstrate that key junctions on the A257 had capacity, and without that assessment, highway safety impacts could not be ruled out.

Yet in this application KCC Highways and the applicant decided together not to undertake a detailed analysis of the A257 / Bekesbourne Lane / Nargate Street junction, on the basis that the new link road through the development would reduce traffic there and improve conditions for cyclists and pedestrians.

That assumption depended on flawed data. Our Parish Council transport paper identified, and the Appellant's expert has now confirmed, that traffic turning left and then immediately right into Nargate Street was mis-allocated as Canterbury-bound. The Appellant's revised count (9 December 2025), which corrected this, reduced the Canterbury-bound left turn count from 43% to 16% of traffic emerging from Bekesbourne Lane - 91 cars and some of those will still be local traffic.

So the amount of Canterbury-bound traffic likely to be diverted through the development road is small, perhaps only a few dozen vehicles in the morning, set against the larger number of trips generated by the development. Using the Appellant's TRICS rate of 4.189 trips per dwelling per day, 300 homes generate 1,256 daily trips. If we assume an equal split between morning and afternoon, that's 628 compared with

less than 90-odd. It follows that traffic at this junction is likely to be increased by this development, not reduced as claimed.

KCC Highways were misled and a capacity assessment of this critical traffic junction in Littlebourne was not done, repeating the 2021 reason for refusal, which stated "*Without such assessment it is not possible to conclude that the proposal would not unacceptably impact highways safety*".

Framework paragraph 116 sets a strict test: refusal on highways grounds requires unacceptable safety impacts or residual cumulative impacts that would be severe, taking account of reasonable future scenarios. Here, safety is already unacceptable for pedestrians. I refer back to the need for a puffin crossing and KCC Highways advice that traffic on the A257 is too heavy for informal crossing. At this crossing point there is also no footpath and no visibility without leaning around the corners of buildings.

KCC Highways have also stated that "*Due to the geometry of the road and lack of additional highway land, it is very difficult to make any highway improvements here that would be appropriate*", so mitigation through rebuilding is unlikely. The only mitigation could be a genuine reduction in traffic. Even the addition of a few hundred extra cars per day from the development will make matters worse not better and would represent a cumulative impact adding to the severity.

That severity will also be increased by future growth: the Appellant assumes 21% background growth plus 13% from committed development to 2045, while assuming no traffic from South Canterbury's 4,000 homes, an assumption that is plainly unrealistic given the likely scale of trip generation and lack of alternative routes to East and North East Kent as illustrated in our LPC Transport Evidence.

I respectfully challenge the Transport & Highways Proof of Evidence by Vanessa Eggleston, particularly in suggesting that low levels of pedestrian and cyclist use of Bekesbourne Lane, together with a low number of recorded accidents, demonstrate that the route is not dangerous and that the development would not have a significant adverse impact on safety. In reality, the absence of cyclists, pedestrians and horse riders reflects the increasing danger of the route, rather than its safety. As set out in the Parish Council's transport paper, fear and

perceived fear arising from vehicle speeds and volumes on rural lanes is a significant and growing issue, leading to a loss of amenity. I also ask that her reliance on peak-hour data be treated with caution, as analysis over a broader time period can present a materially different and more representative picture.

In short, conditions at the A257 / Bekesbourne Lane junction are already severe; added traffic from a development increasing the village population by around 50% would create harmful cumulative impacts on the junction and the surrounding rural road network. The paragraph 116 test is engaged, and permission should be refused; at the very least these safety and cumulative impacts must carry very significant negative weight in the balance.

5. Planning Balance

The Statement of Common Ground reveals fundamental disagreement between the Appellant and the Council. While both cite Framework paragraph 11(d)(ii) and the tilted balance, it is not common ground that this is a sustainable location.

At paragraph 4.14.10 the Council explicitly does not endorse the Appellant's claim that the site is sustainably located. Although the Council then says it will not offer evidence to contest that position, its own Site Scoring Matrix⁴ for SLAA098 describes the site as a large-scale car-dependent development.

This is inconsistent with the site's assessment in the spreadsheet appendix to the Strategic Land Availability Assessment. In the 2025 SLAA Appendix B⁵, 100% of sites described as car-dependent, having limited access, or located on narrow rural roads were rejected as unsuitable. The Council's own evidence therefore demonstrates that it does not regard this site as a sustainable location.

This is a clear breach of Framework paragraph 110, which requires significant development to be located where the need to travel is limited and a genuine choice of transport modes is available. This site offers

⁴ <https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90471>

⁵ <https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90367>

neither: there is no local access to employment or services; walking, wheeling and cycling are unsafe; bus capacity is already constrained; and there is no realistic prospect of improvement. As the Council itself concludes, this is a car-dependent development.

The proposal also fails paragraph 115. Sustainable transport modes are not prioritised; safe and suitable access cannot be achieved for all users, including disabled people and children; and the significant impacts on highway safety and the transport network cannot be mitigated through a vision-led approach.

These failures engage the key policies for directing development to sustainable locations under paragraph 11(d)(ii) footnote 9⁶. Additional breaches of paragraphs 66 and 135 further undermine the proposal, as the affordable housing does not meet identified needs and the development would neither function well nor support local transport networks.

Taken together, the adverse impacts significantly and demonstrably outweigh the benefits. The tilted balance should therefore be disengaged and planning permission refused.

In conclusion, I have highlighted five very significant Relevant Matters:

1. This site is unsuitable for affordable housing as social rent tenants would lack ready access to employment
2. Residents of the site with disabilities would lack safe access;
3. Safe access to the site cannot be provided from the A257 for vehicles or Bekesbourne Lane for non-motorised users;
4. The A257 / Bekesbourne Lane / Nargate Street crossroads suffers from severe safety issues that cannot be mitigated; KCC Highways were misled and it is not possible to conclude that the proposal would not further unacceptably impact highways safety. The development will reduce amenity on the rural lanes.

⁶ Other Footnote 9 policies:

84: avoid the development of isolated homes in the countryside

91: Main town centre uses should be located in town centres

129: Achieving appropriate densities - make efficient use of land (reserved matter)

139: Development that is not well designed should be refused (reserved matter)

5. The council does not agree with the Appellant that this site is a sustainable location. The proposal fundamentally breaches paragraphs 110 and 115 and the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits

Thank you for your attention.