Please find below my comments on the Canterbury District Local Plan 2040

These comments are all related to Site proposal C12, Land to the North of the University

I am a resident in Canterbury

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# **CHAPTER 1 SPATIAL STRATEGY FOR THE DISTRICT**

Canterbury, arguably the jewel in Kent's crown. Premier Cathedral City in the country, World Heritage site. Home to the oldest educational establishment in the country. Canterbury deserved better than to be surrounded by speculative development.

Sadly permission has already been given for very large developments to the East West and South, they are at least contained within the Stour valley, and the only part of the environs not despoiled by masses by housing is the area to the North, ironically protected by the University.

The geographical boundary to the City on its Northern border is the land occupied by the University on the ridge of the Stour valley. The University has a particularly fine outlook over the city towards the Cathedral and Northward across the open countryside of the Sarre Penn valley towards Blean woods and the coast.

It would be adding insult to the injury of this beautiful city to add a huge development in the Sarre Penn valley and beyond, completing the ring of mass housing development around it.

It seems reasonable to suppose that the desire to develop this land, which was until recently, held by Eastbridge Hospital for 900 years or so as agricultural land, is driven by the need to inject considerable sums into the University coffers. It seems to me to be very short sited to destroy the Northern environment of the University and the City for ever, for the short term financial gain for the University. It smacks of sending good money after bad. One of the attractions of The University of Kent is its setting and the destruction of half of it will reduce its attraction to future students, thus making it less viable.

Furthermore developing this land will, regardless of protestations to the contrary, join Canterbury, Rough Common, Blean and Tyler Hill into one urban mass forming a boil on the side of the City. Attempts to claim that there are meaningful "Green Gaps" between these places are simply not credible when they are closely examined. I would pray that further mass development to Canterbury should not be allowed and that the C12 proposal is in reality part of Canterbury.

It must be possible to convince central government that we are a special case given our status in the country, and if not, then smaller developments in less sensitive parts of the district should be put forward.

Enough damage to the City has been done already and no more should be contemplated. Destroying what is left of the setting of the City for a mess of potage is not acceptable or worthy of our generation.

# STRATEGIC OBJECTIVES FOR THE DISTRICT

2) It is true that the revenue from this development will support the University however it will do so at the expense of our environment of Canterbury as a whole. I would suggest that in the present and foreseeable future our University would be better placed to survive and more successful if they concentrated on becoming a sustainable educational establishment with good commercial management.

This development does the opposite of capitalising on our heritage and will undoubtedly assist in its destruction, the Sarre Penn valley was, until recently, part of The Eastbridge Hospital estate, which by convention was kept as open agricultural land, the University went to great lengths to buy it and within a relatively short space of time is going to destroy it. This is a disgraceful abdication of it's responsibilities to history.

It is certain that the pressure this development will put on the Tyler Hill road will cause its destruction. In many places it is only just wide enough for 2 cars and then only at a crawl. These areas are frequently bordered by domestic dwellings that would have to be removed to widen the road. Where it joins the Whitstable road it will require the removal of the parking by the village shops causing them to fail, thus removing part of the sustainability of Blean as a village.

As for improving the sustainability of the area as a whole the valley feeds directly into the proposed new reservoir at Broad Oak, it seems to me that the runoff from 1800 houses into this stream is not likely to enhance the water quality no matter how well the drainage is designed.

For a City as historically important as Canterbury it's expansion should be at least limited by it's history and it's geography, the northern boundary should be the top of the ridge occupied by the University and no further, to allow an urban sprawl to extend beyond this is a travesty of planning. The council can petition the government to reduce the housing requirement to prevent the destruction of the character of Canterbury.

The suggestion that the proposed green gaps will be enhanced is the exact opposite of what will occur, the size of the proposed gap just by Blean school is hardly worthy of the name.

# POLICY SS1 ENVIRONMENTAL STRATEGY FOR THE DISTRICT

3) The Blean plateau is an area of clay covered by gravel deposits that were laid down millennia ago by the then Stour river that over time migrated across Blean from North to South. As it did this a bed of gravel was laid down across the whole area which currently sits about 8 feet down and comes out on the slopes surrounding the Blean as a series of springs. Because this gravel bed sits on clay it becomes a reservoir of water across the whole of Blean, this makes water available to deep rooting plants such as trees all the year round resulting in excellent tree growth.

If the south facing slope of this plateau is built on it is likely that the foundations of the buildings will disturb this reservoir and there is a distinct possibility that the reservoir it will be seriously depleted. This depletion will have a damaging effect on tree growth in East Blean woods, The Radfall and Clowes wood along with the orchards situated on the Blean plateau. (See The Relief and Drainage evolution of the Blean. A Coleman 1954 attached).

C12 contradicts the policy SS1 (10) which states that the council will work with partners to support the extension and improved connectivity of the Blean Woodland complex.

The map of C12 (P 52) showing the make up of the development of C12 also takes considerable liberties with the NE and N boundary where they expropriate a section of farmland belonging to CE Murch Ltd.

The proposal cuts across pras 1.20, 1.22 1.23 and contradicts 1.26. As for improving biodiversity the NE corner of the site is within 50 metres of a large badger sett and the development will impinge on the foraging area for these animals to their detriment.

#### POLICY SS3 MOVEMENT AND TRANSPORTATION STRATEGY FOR THE DISTRICT

6) The road network around the C12 proposal is inadequate to support an increase in population of some 4000 people.

If this development spans the Tyler Hill road it will be impossible to prevent car traffic from using this country lane unless it is closed off, which will prevent access between Blean and Tyler Hill.

This road is incapable of supporting any meaningful increase in traffic. To do so would require the removal of several houses which create a pinch points along it and it would require an improved junction with the Whitstable road. The extra traffic at this point would require the removal of parking at the parade of shops which would in turn make those shops fail because of a severe reduction in trade, this would in turn reduce the sustainability of the area.

The proposed access point at Blean school almost certainly has insufficient sight lines to satisfy the highway authority.

The proposed access at Blean House is on a corner and again has poor sight lines. Placing a major access point opposite a large school is dangerous and will damage the viability of the school.

The proposal to direct the traffic down Rough Common road will require major improvements to the road, removing parking and front gardens. Opposite the shop parking will go and the shop will fail.

The road network around the C12 proposal is inadequate to support an increase in population of some 4000. It is claimed that this is a new rural settlement when it is obvious that it is no such thing. It is a major infill exercise connecting Canterbury, Rough Common, Blean and Tyler Hill.

The concept map of C12 on page 52 shows a green gap on land to the north east that belong to CE Murch Ltd and not the university land it also shows opportunities for a green corridor to the north on land that does not belong to the university and is currently used for fruit growing.

The map also shows opportunities to improve cycling walking and safety on the C&W way. The ambiance of this route which is already well used will be destroyed by this development with the route becoming a race track for electric and IC cycles making it too dangerous for small children and pedestrians to use.

Safety I think not.

The crossing at the Tyler hill road which is already dangerous will become a death trap because of the increase in traffic.

The green gaps supposedly isolating this development are not sustainable or real, particularly the one claimed at the top of Blean hill separating it from Canterbury and Rough Common, its relevant part consists of one small field and the back garden of Blean House.

This is an opportunist attempt to capitalise the University land and has no planning merit at all. It was rejected as a proposal in the last iteration of this plan.

Should the council be unable to convince the government that our proposed housing allocation is too large, there are numerous sites available that would create a real stand alone community and not a boil on the side of the World Heritage site which is Canterbury.

There is no good reason why future generations should have the beauty of the area destroyed. Once this area is built on it is gone for ever and the University rather than standing proudly over looking the City and the countryside toward the coast will just become part of an urban sprawl.

# POLICY DS 12 RURAL ECONOMY

The rural economy, including the University requires a sympathetic environment to attract business and students to it.

At the moment the land north of the University provides a green space for the students and the local population to enjoy. Building on this site and the consequential traffic chaos will make the university and the other educational establishments in the area much less attractive to consumers and make it harder for them to thrive.

It we were planning for the environment and the future the council would be encouraging the grade 3 land on the southern slope to be kept as a green space as a lung for Canterbury, not covering it in houses. It would use the infrastructure levies from other developments to be spent to this end.

The C12 is contrary to section 3 of Policy D12.

As for the current economy, near this development the production of fruit and in particular cherries will not be practical at CE Murch Ltd due to the disruption caused by such a large increase in population from this development. Farming on the urban fringe is difficult, this development will make it impossible.

### POLICY DS19 HABITATS, LANDSCAPES AND SITE OF LOCAL IMPORTANCE

The Canterbury District Landscape Character and Biodiversity appraisal of 2020 is at odds with the development of C12 neither does this development satisfy policy DS19 of the district plan because there is no avoiding the reality that this scheme will create a continuous sprawl encompassing Canterbury, Rough Common, Blean and Tyler Hill. The open space buffers are laughably small.

Blean Church and the archaeological sites associated with it will be damaged by having such a large population adjacent to it.

The C&W was passing through C12, which is heavily used by families with young children will become a race track for electric and IC powered bicycles. This will happened due to population pressure, it is already a minor problem which none of the enforcing agencies have any inclination to stop.

Policy DS19(1) seeks to protect Regionally important Geological and Geomorphological sites.

The Blean Plateau is very unusual in that it has a gravel bed all across it sitting on a deposit of London Clay. This provides a reservoir of water for trees growing across the plateau even in the driest of years.

This gravel bed exits the plateau on the slopes surrounding it as spring and streams. If the south facing slope of the plateau encompassed by this site is developed it is highly likely that the gravel bed will be disturbed and that the reservoir of available water will be reduced. This will have severe consequences not only for the fruit trees that are grown on the

C.E.Murch's land at Well Court and Amery Court but risks reducing the water availability for the section of Blean Woods which sits on the plateau, with consequent harm to tree growth.

A paper written by A. Colemnan and published by the Geological Association in 1954 explains this geology (Paper attached).

The proposal C12 appears to be at odds with the policy of policy DS19.

### POLICY DS 21 SUPPORTING BIODIVERSITY RECOVERY

The C12 development cuts across the councils stated policy at para 6.65 which designates The Blean as a biodiversity hotspot.

The council states that major sites such as C12 provide opportunities to improve biodiversity.

The effect of developing this site will have completely the opposite effect. For example at the north east corner, under 50 metres from the site there is a major badger sett which will have its foraging area decimated by this development. Minty's wood and Clowes wood which are adjacent to Well Court Farm are home to several nesting Buzzards, the development of this site will considerably reduce the area they have for hunting for small mammals and pigeon. One thing Biodiversity needs above all else is access to food.

The old Drove way that runs along the edge of the site adjacent to Amery Court Cherry orchards and is a major reservoir for wildlife will be destroyed by population pressure.

The Sarre Penn that runs through the middle of the site will undoubtedly lose much of its wildlife as a result of 4000 people living next to it.

Developing the site contradicts policy DS21.

#### POLICY DS 22 LANDSCAPE CHARACTER

It is obvious that the natural boundary of Canterbury to the North is the built university campus and that any development to the North of this will have a seriously detrimental effect on the landscape.

Development C12 will contradict policy D22 item 2c which states that the development should not have an adverse impact on important long distance views including vantage points the PROW network and National trails.

This development will ruin the view from the northern ridge where the University is situated and destroy the character of the national cycle path route along a major stretch of the Crab and Winkle way. It will be particularly destructive of the Tyler Hill road and the area around the listed Blean Church which currently sits in a rural haven.

In fact if you wanted to create a development that goes against almost all of policy D22 you would be hard pressed to find one more likely to achieve this than C12

# POLICY DS23 THE BLEAN WOOD COMPLEX

The council in policy DS23 para 5 makes it clear that C12 will need to ensure that the development does not adversely affect the landscape ecology or setting of the Blean wood Complex.

I believe that this is an impossibility as the population pressure created by this development will hasten the destruction of the nearby areas of Blean woods and its wildlife.

Amongst other things the likely disruption of the natural gravel reservoir under the Blean that will be caused by building on the southern slope of this site must damage the health of the trees both in the woods and on the fruit farm at Amery Court by reducing or removing the water supply in dry summers. See DS19 above.

### POLICY DS26 HISTORIC ENVIRONMENT AND ARCHEOLOGY

The proposal at C12 can only damage the environs of Blean Church and the Roman villa site, along with the old droving road now used as the Crab and Winkle way, whilst ruining the northern environment of the University campus.

As far as Canterbury's status as a Unesco world heritage site is concerned, the major developments already agreed or under construction around the City must be putting that status at risk.

The Northern ridge where the University Campus stands must form the limit of development of the City. To suggest that this development is separated from and not joined to Canterbury is disingenuous, it will ruin the landscape north of the University for ever and will be a boil on the side of the City. It will make the University, St Edmunds and Kent College less attractive places for people to study.

Any financial benefit captured by this development will be transitory. The destruction of the landscape will be permanent. For the sake of future generations this development should not be permitted.

# POLICY CF3 PEDESTRIAN AND CYCLE ROUTES

The Cycle route that follows the Crab and Winkle Way will be severely damaged by population pressure where it traverses the C12 site.

It will become a race track for powered bicycles, both electric and IC use the Crab and Winkle way to a limited degree now. The police and the council have shown no interest in preventing this by reinstalling appropriate barriers or by using their legal power to penalise the users. Place 4000 people next to the path in the Sarre Penn valley and its destruction as an enjoyable and safe route is certain.