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From: Neil Taylor

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Mr Neil Taylor 02/06/24 Date



RESPONSE TO THE DRAFT LOCAL PLAN 2040 - Chapter 1 Q1 & 2 + Chapter 2 Policy C12

I have been a resident of Tyler Hill for over years and wish to formally register my objection to Policy C12 Land North of the University of Kent.

My objections and observations are listed in the following paragraphs.

Heritage

There are a number of heritage sites and conservation areas within the area covered by the C12 plan which will be adversely affected by the development. This includes in particular the 13th Century Church of St Cosmus and St Damian (grade 2 listed). The houses and the 'community hub' will only negatively impact the character of the surrounding area turning it from a pleasant country area into a "brick jungle". The proposal does not provide a credible explanation of how that negative impact could be mitigated.

Landscape and Character

Tyler Hill is a village set in a rural location surround by woods and open countryside. It has a small population and a strong local identity. During the 40 years I have been in the village I have been associated for some time with the village hall committee and have worked with volunteers who have actively supported the Hall Committee in its work providing support to the community.

Policy C12 proposes a 'rural settlement' of 2,000 houses which is likely to mean an additional 4,000+ residents in the immediate vicinity. This is a massive increase in the population of Blean <u>and</u> Tyler Hill and that will affect the identity and character of both Tyler Hill and Blean as the villages will be irreversibly changed by becoming part of a new and greatly enlarged urban settlement.

Policy C12 therefore does not support the Draft local plan 2040's 'spacial strategy for the district' specifically the reference to 'recognising the intrinsic value of the countryside within the district and the contribution it makes to the local area'

Access points

On first sight, the proposed access solution to the C12 site is not realistic. The proposal focuses on two main access points on Whitstable Road, one near the Rough Common roundabout and one at Tyler Hill road. The latter is a very narrow residential road already providing a limited but important connection between Tyler Hill and Blean.

Tyler Hill road is currently adequate for access between the Blean and Tyler Hill but is put under great strain when for example there are traffic works on the A299, A2 and Rheims Way. Indeed, when recently Tyler Hill Road and the A299 were closed simultaneously a trip from my home to Estuary View had to go via Rough Common, Brenley Corner and the A299. The journey was not helped when I discovered that the A299 was reduced to single lane working.

Policy C12 states that the addition of traffic resulting from 2,000 new homes (estimated by various sources to be in excess of 3000 vehicles) will be managed by "minimising traffic flow onto Tyler Hill Road". This assurance is not however backed with a with a credible explanation as to how this will be achieved.

According to available data the number of cars in Tyler Hill is currently about 300. It is not unreasonable to assume that the increase in vehicles locally will cause huge disruption to access between the villages. Perhaps more importantly, restricted access to the A299, A2 and Canterbury will affect commuting and will negatively impact access to Accident and Emergency services in Ashford and Margate which use the Rheims Way and Whitstable A299 junction respectively. In addition, if traffic flow is to be minimised through the physical limitation of vehicles into Tyler Hill Road then the community impact to Tyler Hill should not be underestimated given the essential access it currently provides for residents.

Given the lack of detail provided in C12 it is difficult to object to what are currently unknown measures to "minimising traffic flow onto Tyler Hill Road" but I can't accept any measures which restrict access to Tyler Hill Road for Tyler Hill residents given the negative impact on their quality of life.

While I no longer have children attending Blean Primary I am less than happy with the proposed relocation of the school with the consequent disruption it will cause to children and teachers and the negative impact on safety from the increase in traffic and pollution.

I understand no assessment of these proposals has been made publicly available for consideration alongside the Draft Local plan. This is inappropriate and contrary to the plan's stated goal of "improving the health and well being of local communities".

Transport

The Draft Local Plan states that C12 will be 'car-dependent' and as stated above will likely result in 3,000 additional vehicles using local roads. I have worked for a transport team based in central Canterbury for some years. Experience proves that local roads have seen increasing levels of significant congestion during peak periods and the increase in traffic will have a detrimental effect on current journey times, air pollution and road safety. It should be noted that the Road Safety Foundation in 2019 identified Whitstable Road as having one of the worst road traffic accident records in the UK. There has also been evidence of deteriorating road surface quality in recent years (particularly true of roads around Tyler Hill). Whilst acknowledging Canterbury Council and Kent Councils's efforts in reducing the pothole problem I note KCC will have to provide an extra £135 million in funding over the next 11 years to ensure an improvement. The 2000 extra houses in the Draft Plan plus all those being built around Faversham, Whitstable, Herne Bay, Margate/Ramsgate/Broadstairs and Whitfield will likely stretch this budget beyond breaking point.

I understand no traffic impact assessment has been made publicly available for consideration alongside the Draft local plan which is inappropriate and contrary to the plan's stated goal of "improving the health and well being of local communities".

With regard to Tyler Hill Road, this has a weight restriction and is very narrow at points making it difficult for two vehicles to pass each other safely. In addition, Tyler Hill road has private properties and a conservation area bordering the road which will prevent any practical widening of it. Apart from the foregoing, Calais Hill between Link Road and the junction with Canterbury Hill has suffered from severe subsidence for the last 50 years to my certain knowledge and still suffers from it to this day. There is no credible explanation in C12 to evidence how it can achieve 'minimising traffic flow' and no reference therefore to how it could be done without negatively impacting the current access it provides between Blean and Tyler Hill. The access Tyler Hill road currently provides is essential for residents and as stated above I oppose any measures that place local residents at a disadvantage by restricting the current level of access.

Once again, due to the lack of a comprehensive traffic impact assessment being made publicly available it is impossible to gauge the wider impact of the additional 3,000 vehicles resulting from C12 on North Canterbury as a whole however there are already present points of traffic congestion such as the roundabout at Rough Common, and the junction between London Road and Whitstable Road and the adjacent Forty Acres road which could not accept any further increase in traffic without severely impacting journey times, road traffic safety and air pollution. There is no provision in C12 to alleviate the impact of the sites traffic on these areas.

As a regular user of the bus between Tyler Hill, Whitstable, Herne Bay and Canterbury I feel that while these and other bus services in the area are useful, the 'Bus-first strategy' is not a credible solution to offsetting increased traffic flows resulting from policy C12. At the Public consultation on 21/05/24 CCC stated that their bus usage modelling was based on other UK cities and not specifically modelled on Canterbury and there was no local evidence available to suggest that the Strategy would effectively address problems arising from additional traffic caused by the implementation of the C12 Plan. For Tyler Hill particularly, bus services are unreliable with a 2 hourly service on a Sunday. Also, CCC does not control how the services are provided as this is operated by a Private company. On this basis the bus-first policy is unproven and unreliable as a solution to reducing the huge increase in traffic resulting from Policy C12.

It should also be noted that the references in policy C12 to 'providing improved walking and cycling connections to the city centre' will be of limited benefit to residents of C12 who are not physically able to use the route due to its hilly nature.

Wildlife, Biodiversity

I have little personal knowledge on this subject, however, on investigation I have discovered that the area has several protected species including Skylarks, Nightingales and Great Crested Newts. The area is apparently rich in wildlife which has been evidenced in surveys conducted recently by the University of Kent's Conservation society which noted over 77 distinct species. Given the size of the impacted area is seems highly unlikely that the proposed development could compensate for the loss of this biodiversity given the resulting destruction of the local habitat.

Farming

This again is a subject on which I have little personal knowledge. Investigations however show that Policy C12 will result in the permanent loss of large areas of grade 2 and grade 3 agricultural land which is presently used for food production.

Waste Water Plant

This seems to have been something of an overlooked subject but a quick reference to the internet indicates that a waste water plant in close proximity to existing residents homes will blight the values of those homes and negatively impact local wildlife and local food sources particularly some fruit trees. Any odors from the plant will also affect the health and well being of residents. This planned waste water site would be deemed to be too close to Tyler Hill properties. Not surprisingly, there is no provision in C12 to consider the impact of the facility on residents nor how CCC will plan and make provision for resulting blight claims from residents due to the impact on their property values and ability to re-sell their homes for their true market value.

Summary

I feel that in too many instances assessments of how problems with policy C12 will be addressed are either missing or glib. It is therefore difficult to assess what the full risk of endorsing C12 will be and on that basis I object to the policy and believe it should be removed from the Draft Local Plan.

Neil Taylor