## LOCAL PLAN 2040

- 1. I am responding as a resident of the Canterbury district
- 2. The parts of the Local Plan that I would like to comment on are: Chapter 1: Spatial Strategy for the District Chapter 2: Canterbury

## **Chapter 1:Spatial Strategy for the district**

## Q. 3 Policy SS1: Environmental Strategy for the district

Site C12 is currently a large, peaceful, well integrated area of farmland, green fields and woodland, but the massive, proposed development of 2000 houses plus a commercial hub would not only destroy much of it but carve up the remainder into disconnected bits, thus contradicting Policy SS1 (10).

Eliminating so much of the green space between the villages of Tyler Hill, Blean and Rough Common, and between them and Canterbury would not only ruin their distinctive characters but produce a huge urban sprawl, with heritage buildings like St Damian and St Cosmos Church surrounded and out of context.

The result would be a development as big as a town, yet not self-sufficient. Unless the 'commercial hub' supplied a huge range of services and amenities, there would be even more residents and workers from increasingly distant outlying areas pouring into a comparatively small city centre of medieval design.

Developers have a poor record in delivering on their planning application promises: could we be sure that affordable houses or GP practices or new schools would actually materialise? Would a replacement for Blean Primary School retain the friendly local atmosphere and Outstanding rating of the present one?

This development would soon trigger many other planning applications, both new and (like this one) revivals of previously rejected schemes, of which there have been several relating to the open space behind Rough Common Road and Palmars Cross Hill. These would be much harder to resist after a Site C12 precedent was set. No doubt there would also be an explosion of other proposals for sites nearer Whitstable.

### Q. 6 Policy SS4: Movement and Transportation Strategy for the district

Few would disagree with the aspiration to encourage walking and cycling. But the Blean proposal conflicts with SS4 (1.49): 'focusing growth at the urban areas, and at Canterbury in particular, presents the greatest opportunities to plan for a switch to sustainable transport'. Site C12 is rural, outside the urban area, a long way from the city centre, and on top of a long, steep hill.

As is already the case with Rough Common, Blean and Tyler Hill, few of the C12 residents and none of the elderly or disabled would choose to walk or cycle into Canterbury. And bus take-up would be limited by the challenge for families of transporting infants or carrying home bulky items or supermarket supplies. It would also be limited by time-specific appointments (e.g. medical), unless the public transport were frequent, punctual and reliable, with enough bus stops: a pious hope. In short, the site is rightly described in the SLAA itself as 'a large-scale car-dependent development'. No comparable developments have ever been otherwise.

# **Chapter 2: Canterbury**

#### Q.12 Policy C12: Land North of the University of Kent

There has hitherto been an eloquent silence about solving the practical difficulties of getting a huge amount of extra traffic, private, commercial and public, out of site C12., even though the 2017 Local Plan (Policy EMP7) makes significant new University development contingent on a so far non-existent updating of the University's Transport Impact Assessment and its Travel Plan. Would the University want to send extra traffic through its own campus onto University Road or Giles Lane? And how does the existing University bus service fit in?

One of the three possible exit routes would be via Tyler Hill Road, a narrow, winding country road, which would have to carry much more traffic in the directions of both Whitstable Road and Hackington Road/St Stephen's Hill. It is ill-adapted for this.

The more southerly access points to and from Whitstable Road would be via Blean School, by destroying the existing school; and via what is now a bridleway opposite Kent College, thus destroying the Crab and Winkle pedestrian and cycle route and isolating the beautiful old farm house and related buildings. This in itself would,

ironically, deter cycling between Canterbury and Whitstable. Fast recreational cycling would probably increase to nuisance levels in Blean Woods Nature Reserve.

There is nothing more than a vague suggestion about an upgraded roundabout to get traffic from Site C12 either down Whitstable Road, adding to the St Dunstan's congestion, or across onto Rough Common Road and thence down a very steep hill, towards two new slip roads at Harbledown, meeting the substantial traffic coming off the A2.

Not only is there no specific plan for implementing any of this, let alone costing or funding it, but it sounds like a revival of the mad 'northern bypass' idea. The existing Rough Common Road cannot possibly accommodate several thousand extra vehicles. As it is, the rush hour period creates a nose-to tail traffic queue, with a permanent danger spot at the blind bend between Ravenscourt Road and Lovell Road. Even if all parking and stopping were banned (thus damaging the trade of the newly refurbished village shop), this road would need to be significantly widened by compulsorily purchasing and demolishing many houses along one side or maybe both, including St Gabriel's Church or the houses opposite it. Main road residents would be left within a couple of metres of a noisy, hectic, polluting major through-route, and residents of all the side-roads feeding onto it would find it even harder and more perilous to enter or leave the main road by car, let alone cross it on foot. The blighted village would be split in two. Would any zebra crossings or traffic lights be supplied? Or would faster (often speeding) traffic flow continue to be prioritised over pedestrian safety?

One obvious 'solution' would be to send this traffic via Neal's Place Road, thus gobbling up yet more of the green space between Canterbury and the outlying villages.

Finally, there is an ironic contrast between the lip-service to 'sustainable transport' and the withdrawal of all bus services, apart from school buses (unavailable to the general public) from Rough Common. Buses and coaches do use it as a rat run, of course.

In October 2023 Canterbury City Council declared a Biodiversity Emergency and a need for a Nature Recovery Strategy, yet the Site C12 scheme directly conflicts with this, with its destruction of huge swathes of natural habitat, home to so many threatened species, such as skylarks, hedgehogs and great crested newts, that were common in this area a generation ago. Not only would a 20% net gain, in line with Policy DS2, be a mere pipe dream, but it would be no consolation to the local population (human or animal) for some sort of compensatory gesture to be offered outside the area. This is robbing Peter to pay Paul. And the 'gain' would certainly be minimal, since developers would strive to avoid paying out for anything outside the actual site of their operations.

Altogether, the whole C12 proposal promises large financial profits for the University and the developers, while everyone else, including council tax payers, gets the downside, along with much of the cost. It would be hard to imagine a scheme that so adversely affected so many people and communities outside the development site itself.

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Alerted to consultation by an email from the council and by Save The Blean organisation