

Canterbury District Local Plan 2040

Consultation response from a resident to consultations@canterbury.gov.uk.

:

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The response addresses several sections of the Plan (indicated in headings) and its supporting documentation.

Preamble

Missing priority:

The priority for the district, which seems to be missing from the plan, is to provide c. 2700 good quality council homes for those on the waiting list. The Levelling-up and Regeneration Act 2023, which came into force in April 2024, allows bodies such as Homes England and councils using Compulsory Purchase Orders and looking to build, to apply to the Secretary to remove 'hope value'.

Positive features:

- the decision not to implement the proposed Canterbury Circulation Plan,
- supportive policies for Blean Woodland and Old Park,
- a transport strategy that focuses on better bus services

but fear that implementation will fall far short of the aspirations

Negative features:

- The plan fails to recognise the level of distress that it is causing to communities throughout the district.
- The level of growth proposed will put intolerable strains on infrastructure and personal wellbeing and must be curtailed.
- The assertion that the range of new homes will meet the needs of the district is based on a national formula not a substantive analysis of the real needs of the district.
- The total derived from the formula far exceeds the actual need of the district as indicated by ONS data.
- It is a serious understatement to say, as the plan does, that 'the level of growth proposed will undoubtedly place pressure on existing infrastructure'.
- The construction of a total of **24,514** new dwellings [**new plan: 9346 + 15168 already approved**] generating an increase in population of **c.70,000** cannot be sustained within the numerous, demonstrable infrastructure, social, health constraints and the unique heritage of Canterbury.
- The Council must be prepared to argue for a substantially lower total to protect the future sustainability of the district and the city of Canterbury.

- **Policy C12** does not satisfy the criteria specified in the plan and should be withdrawn.
 - It will destroy productive farmland and rich biodiversity.
 - It will permanently damage the rural environment, heritage sites, buildings, archaeology.
 - It will generate a volume of traffic. [In the case of the Policy C12 in the previous plan a lower number of dwellings warranted the proposed Eastern bypass.] In the new C12 (university farmland), with a significantly higher number of dwellings, no adequate provision for the increased volume of traffic is planned.
 - **C12** is the complete reverse and denial of the 2019 Master Plan produced by the University of Kent which committed to protect the whole of its farmland site, acquired in 2006, as a green environmental asset for the University and the district.
 - The Plan states that it is in accord with the University Master Plan which is manifestly untrue.
 - It is contrary to the recommendations of the **2020 Canterbury Landscape Character and Biodiversity Appraisal**

Spatial Strategy for the district

1.14. The assertion that the *'plan recognises the intrinsic value of the countryside within the district and the contribution this makes to its rural character'* conflicts with the proposal to urbanise and extend ribbon development between Canterbury and Blean by building on over 100 hectares of productive grade 2 and 3 farmland - policy **C12**.

It is also contrary to the 'Canterbury Landscape Character Assessment and Biodiversity Appraisal' Final report Prepared by LUC October 2020 for the District Council. As the report states in *1.4 The Canterbury District Landscape Character Assessment and Biodiversity Appraisal (2020) provides a **robust evidence** base to underpin the review of the Local Plan and to assist in the local planning process.*

The new plan manifestly ignores the strong recommendations of the appraisal and consequently fails to recognise, as it says it does, *'the intrinsic value of the countryside within the district and the contribution this makes to its rural character'*.

The Vision for the District to 2040 asserts that *'important habitats and landscapes will be restored and enhanced, supporting the recovery of nature, improving environmental resilience and providing significant increases in biodiversity'*. This is incompatible with the devastation that policy C12 will entail.

Strategic objectives for the district

The 2022-2023 consultation noted that *'our communities raised fundamental concerns with the scale of growth proposed'*.

This plan proposes virtually the same rate of growth, i.e. it does **not** address the *'fundamental concerns of our communities with the scale of growth'*. The emphasis on the total of 9346 dwellings proposed, seems designed to obscure the failure to respond to the concerns of the local population in part because the time span is reduced by 5 years.

The plan fails to acknowledge, at the outset, that this, seemingly lower total, is in addition to the **15168** dwellings already agreed, taking the actual total increase by 2040 to **24,514**. This will generate an increase in total 'permanent' population (excluding students) of over **60%** with all the

associated demands which cannot be sustained in what is essentially a small town circumscribed by its medieval setting.

The scale of growth is not compatible with the Council commitment to the SDGs. It is based on a consumption growth model which fails to recognise the need for societal change not limited to curtailing travel to foot, bicycle and bus.

There is a lack of due diligence throughout the plan. Infrastructure requirements such as electricity for the large increase in demand from the dwellings, commercial development, charging points throughout the district, are not assessed.

The Draft Delivery Infrastructure Plan 2022 has no dates for delivery and for key utilities is similarly vague stating: *“Energy 14.6. UK Power Networks ... it is anticipated that any connections and associated infrastructure improvements will be identified and delivered alongside individual developments. Southern Gas Networks and National Grid have not confirmed the impact of the proposed Local Plan growth and the need for additional infrastructure. Further engagement will be undertaken as work on the Local Plan progresses”*. Neither statement is reassuring and suggests that effective, interrogative due diligence has been neglected.

Since the plan is already causing serious distress and will disrupt, upset communities over many years, cause considerable damage to all aspects of the environment, exacerbate urban stress through a 60% increase in population in an essentially small town, increase the challenges of access to health and social service, a thorough examination of the implications and impact of all aspects of the plan should be provided. As indicated that is not the case.

It is naïve not to acknowledge and evaluate all the damaging, destructive impacts that development on this scale entails: pollution, household waste, transport of effluent from the multiplication of large estate-based sewage plants (waste water treatment plants), water supply (*Even if approved, Broad Oak reservoir is unlikely to be commissioned until 2040, at the earliest, when the population will have grown by over 60% plus the ambitious commercial development envisaged*).

There will be a quantum increase in traffic - delivery vans, busses flowing constantly in all part of the district. While the Plan aspires to discourage car use families, older people, workers in essential, unsocial hours, services, will need and continue to use their car and their number will inexorably increase with the growth planned. The plan may seek to nudge people out of their cars and this may be desirable but the reality of the flexibility which a car offers individuals and families, even if abated, will continue and planning needs to recognise this. The Department for Transport National Travel Survey updated December 2023 is relevant and notes:

“There have been long-term increases in the proportion of households with access to more than one car since 1971, with 34% of households having two or more cars in 2022 compared to 8% in 1971. The proportion of households with one car was 45% in 2022, however, the long-term trend has remained broadly constant since 1971 with an average of 43%. The proportion of households without a car fell from 48% in 1971 (based on the Census) to 22% in 2022. In 1985 to 1986, there were 8 cars for every 10 households in Great Britain; in 2022 there were 12 cars for every 10 households in England”.

Paradoxically the expansion of electric car ownership might lead to more car use because it will be cheaper and considered environmentally responsible.

The vision for the district is replete with assertions and marketing speak but the sheer increase in dwellings, population, pollution, infrastructure, demands for social and health services, traffic,

resulting from the growth mantra, cannot be sustained responsibly in this district. It is not as though the district is not already committed to significant growth - **15168** dwellings are already agreed.

The decision to move the emphasis from road building is applauded but the scale of the proposed housing increase and consequent population growth cannot be sustained within the existing infrastructure. This contributes to the case for exception for Canterbury from the arbitrary needs assessment formula.

The strategy asserts that green gaps between settlements will be **protected and enhanced** supporting nature's recovery and biodiversity and improving health and wellbeing. **C12** completely contradicts this. It is a major green gap with well documented biodiversity and a network of public footpaths which contribute to and improve the health and wellbeing of the community.

The **four main themes** of the plan '**delivering for our community**':

- *Protecting our district for future generations*
- *Listening to our residents*
- *Feeling safe, secure and healthy*
- *Growing our district sustainably*

are empty advertising slogans in the context of a plan based on excessive development growth which is incompatible with all four themes.

Case for exception

The location, heritage, environment and actual (as opposed to national formula theoretical) housing needs of Canterbury require that the Council submit a case for exception.

A report commissioned by Canterbury City Council in 2021 shows that the rate of growth forecast by the ONS is no longer realistic. The Edge Analytics report predicts population growth of 8% between 2023 and 2040, this should be related to the ONS figure below. The ONS notes that in Canterbury, the population size has increased by 4.1%, from 2011 to 2021. This is lower than the overall increase for England (6.6%). The latest *ONS Projected percentage change in number of households for local authorities in England, 2018 to 2028* shows a growth of **4885** households for Canterbury in ten years. Assuming a similar rate over 22 years 2018 -2040 would imply a total of **10747 not the planned total of 24,514**.

Under the latest version, December 2023, of the National Planning Policy Framework, the Council can (and has been encouraged to do so by the Minister in a statement to the House of Commons January 2024) make the case to Government that Canterbury has "exceptional circumstances" for fewer houses than dictated by the outdated national needs assessment formula – **the Council is strongly urged to do so**.

The Inspector will recognise that local Authorities have been encouraged by the Minister to consider and make the case for exception. The notion that an inspector will 'punish' the authority for doing so has no justification. It presents the Inspectorate as a malevolent adversary rather than an office tasked with making equitable, highly experienced, informed judgements.

Not to make the case will betray the commitment that the Council is '**Listening to our residents**'.

University role

The plan says that it will *'Support the growth and development of our universities and colleges as a centre of innovation and learning excellence, which stimulates business start-ups and generates skilled jobs'*.

The sale and development of all the University of Kent land, purchased in 2006 to protect the University and provide for its own development, will seriously impede future long term University development. The original site is already heavily developed and the southern slopes have been ruled out of any development by earlier planning decisions. This appears to be an example of the lack of due diligence and defeats the objective of supporting the University as an engine for growth.

Policy SS1: Environmental Strategy for the district

This section is a further example of policy rhetoric undermined by the reality of the detail. It notes that

- *'Biodiversity has been declining across the country'*; that
- *'The historic environment of the district is valuable locally, nationally and internationally'*; that
- *'The Local Plan provides new opportunities to improve biodiversity and the connectivity of our habitats.*
- *The network of green and blue infrastructure ... which provides important habitat valued landscapes and spaces for recreation and which supports our health and wellbeing, will be **protected, maintained and enhanced** in line with Policy DS19.*

However, all these assertions are hollow in the context of policy C12, which will destroy a landscape rich in biodiversity, historic heritage buildings, archaeological sites, important habitat, valued landscape and an abundant network of footpaths which provide spaces for recreation, which already support health and wellbeing for the whole district.

The concept of net biodiversity gain of 20% on a site, already abundant in biodiversity, destroyed by concrete, roads, cars, charging points, delivery vans, two schools, commercial development, a sewage plant, sludge removal lorries, is Kafkaesque. Transporting the biodiversity net gain (like carbon trading) cannot substitute for its destruction in situ and becomes another form of green washing.

Development Strategy for the District

"1.44 Taking account of the responses to previous consultations, the plan also identifies land for a new settlement to the north of Canterbury." [C12]

It is not clear in what way this proposal could or does take into account *'responses to previous consultations'*. It was rejected in the previous plan on several coherent grounds. There has never been any local community consultation on the **C 12** proposal. The Council cannot maintain that it is *'listening to our residents'* over this proposal.

The local community had every reason to trust in the earlier rejection of the University of Kent site and that the guiding principles would be those set out and agreed with the Council in the University Master Plan dated 2019 which committed to preserving and enhancing the essential character of the Sarre Penn landscape.

In 2019 the University publicly confirmed that it intended to conserve the area now offered for commercial development - University of Kent Master Plan

- P 168 3 *“Built Environment: The Framework Masterplan recognises the high value of this **character area** as predominantly open amenity space and agricultural land, to balance with the consolidation and intensification of the Campus Heart.*
- *The masterplan **is intended to conserve and enrich** the natural landscape features of our campus, including in the areas identified within the Sarre Penn character area;*
- ***the proposals therefore include only very limited development within the Sarre Penn Valley**”*

It is difficult to avoid the conclusion that indirectly and directly University lobbying and its finances have influenced the decision. Indeed, this is implicitly acknowledged (see below).

The fact that the University has expended considerable resources to persuade decision makers that the sale of the land conforms to its Master Plan and long-term objectives because its situation has changed, feeds the suspicion that the strength of lobbying and the powerful resources of the University have legitimated the radical change of policy. There is no substantive difference in the nature of the land and its relationship to the University, so lauded in 2019, and no effective reason other than opportunism.

The Nolan principles indicate that the Council should make public all its dealings with the University and its agents. The statements by one of the agents for the University, Avison Young, in their consultation response to the previous rejection, are highly pertinent:

- *‘That there is an unignorable economic need for the Sites to be delivered, to ensure the future success of the University (and to ensure that its significant contribution to Canterbury’s economy is sustained)...*
- *When teamed with the significant economic pressures which the UoK is facing (**and the requirement for the Local Plan to address these**), the case to allocate Sites BCD for housing-led development within the Local Plan is clearly compelling’.*

The Council asserts that for planning purposes it cannot take account of such factors but the dramatic change in the University position from its Master Plan in 2019 cannot be ignored. That plan was submitted to the Council and is said to be part of the logic for supporting the University and yet C12 is diametrically different from the commitment made by the University in 2019. A reversal of this magnitude undermines public trust in public institutions and should prompt reservations from the Council.

Policy SS3 - Development Strategy for the district

‘A new **rural settlement** is planned for land north of the University of Kent’. This will be rural in name only. The scale, 2000 houses with a population of c.8000, will create an urban estate over an area twice the size of the walled part of Canterbury. It will effectively merge two distinct small villages Tyler Hill (c. 500 residents) and Blean (c.1500 residents) dwarfing their population.

Policy DS12

“The council will seek to protect the best and most versatile agricultural land for the longer term. Any development on agricultural land will need to be supported by an Agricultural Land Classification Assessment. Development on unallocated agricultural land that would result in the significant loss of Grades 1, 2 and 3a agricultural land will only be permitted where it can be demonstrated to be necessary to meet a local housing, business or community need and a suitable site within urban areas and settlement boundaries or on poorer quality land cannot be identified”.

There is no evidence of an *Agricultural Land Classification Assessment* for Policy **C12** which is grade 2 and 3 land. The Landscape evaluation (2020) commissioned by the Council recommended that all that land should be conserved and enhanced. Prima facie the Plan does not respect the commitment in policy DS12.

Policy DS14 Active and Sustainable travel

6.42 *Even in the context of the prioritisation of active and sustainable travel options, **most developments will generate additional vehicular trips** and it is **essential** that the potential **impacts on the highway network are effectively assessed and mitigated where necessary.***

The impact of **C12** has not been assessed for public review. The impact of all the developments and in particular **C12** will increase road traffic to an extent that as envisaged in Policy DS15 *'the development will lead to unacceptable highway safety; and 'The residual cumulative impacts on the road network will be severe'*. **For these and other reasons the proposal should be withdrawn.**

Note: C12 in the previous plan, with fewer dwellings than the new C12, was withdrawn on the grounds that it was predicated and depended on the Eastern corridor road which has been removed. This site will generate greater traffic, but no effective provision has or can be made for the increase in all forms of traffic that it will generate.

C12 Land north of the University of Kent

This proposal should be withdrawn for the reasons set out above and below.

- It is an extensive greenfield site in the heart of the Blean, twice the size of the central, walled part of Canterbury.
- It would destroy the rural character of the area, productive grade 2 and 3 farmland, precious green space, wildlife, the character of three distinct villages and communities, turning them into a giant conurbation within the suburbs of Canterbury.
- It would dramatically increase traffic across the north of the city, and heap pressure on already overwhelmed GPs, schools and public services.
- It is contrary to the plan commitment to 'recognise the intrinsic value of the countryside within the district and the contribution this makes to its rural character'.

The 2020 Canterbury Landscape Character and Biodiversity Appraisal describes the Amery Court Farmland within which the University land is located and which demonstrates all the characteristics described in that appraisal

- *"as a rural area with a woodland backdrop and some experience of tranquillity and dark skies away from the settlements.*
- *It has a strong association with the surrounding Blean woodlands and is experienced as part of this wider landscape by people accessing the area for recreation along the Crab and Winkle Route or promoted Blean walks along the Sarre Penn Valley.*
- *There is limited road access into the centre of the area with the main transport routes running north south linking the coast and city, which further emphasises the rural, relatively isolated character". (p165).*

In its summary of 'Key Sensitivities' it notes the '*General absence of roads within the wider landscape, with extensive PROW network often on former drove and saltways providing access and linking to the surrounding woodlands, including the Crab and Winkle Way*'.

Its recommendations are to '**conserve and enhance**' all the natural features of the area.

The District Plan acknowledgment of its own appraisal is perhaps aptly reflected by Alice - "*If I had a world of my own, everything would be nonsense. Nothing would be what it is because everything would be what it isn't. And contrariwise, what it is, it wouldn't be, and what it wouldn't be, it would*".

The plan offers to '*Retain substantial areas of the existing tree cover and incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Areas F2: Stour Valley Slopes and E3: Amery Court Farmlands set out in Canterbury Landscape Character and Biodiversity Appraisal*'.

It is as though the authors have not understood the meaning of the words '**conserve and enhance**' all aspects the landscape. The 2020 report specifically recommends the Council to:

"Maintain the essentially linear pattern of Blean and Tyler Hill villages avoiding further infilling or extensions that would create a greater urban extent.

Maintain the open rural gaps along the main north south road routes allowing views into the wider rural landscape and woodland, maintaining separation between built areas.

Conserve the rural character of the landscape ensuring that it continues to play a role in the separation of Blean and Tyler Hill with Rough Common and the University of Kent to the south, and particularly the role of the Sarre Penn Valley in defining the southern edge of development in relation to the Stour Valley slopes" (p 167)

The District plan for the University farmland C12 is totally incompatible with the recommendation of the Landscape Appraisal. Construction of a sewage plant, 2000 houses, c. 8000 more residents, PROWs turned into urban footpaths, the Crab and Winkle hemmed in by building, roads, cars, delivery vans, two large primary schools, commercial development, pollution will eradicate the rural character of the landscape and destroy biodiversity. How could this possibly provide '*opportunities for landscape and biodiversity enhancements*'?

The assertion in 2.17 that "*The new rural settlement ...provides important opportunities to create large new areas of open spaces, creating significant separation from Blean and Tyler Hill, and improved ecological connectivity to key natural assets in the area, including Blean Woods*", is a further example of a new reality.

The whole area is already a large open space. There is already good separation between Blean and Tyler Hill. The development will obliterate that productive, distinctive, rural separation, prevent *ecological connectivity*, substitute an urban sprawl. As Victor Meldrum might say 'This (you) cannot be serious'.

Canterbury district local plan 2040 Sustainability Appraisal Report - Draft Canterbury District Local Plan 2040 (Regulation 18)

5.6.61. *While the site-specific SA (for C12) has identified significant and minor negative impacts, when reviewed alongside the SLAA, on the balance of positive and negative impacts and considering possible mitigation and design, it is considered that the majority of these impacts can be addressed*

through further refinement (and some uncertainty is still required to overcome with regards to the Blean Complex SAC

The plan does not say precisely what has changed or how the significant negative impacts can be overcome.

The concept of ‘refinement’ is ambiguous and inappropriate for a project on the environmental scale proposed and which is contrary to key principles said to be guiding the plan- ‘*protecting our district for future generations; listening to our residents; feeling safe, secure and healthy; growing our district sustainably*’.

5.6.64. *Whereas the Land North of the University of Kent was already identified as a potential area of growth in the Draft Local Plan (2022) and subject to consultation where it received less negative comments than Cooting Farm. The site promoters have actively been engaging with the Council and other parties, and as such have provided evidence in regard to suitable access and possible transport mitigation, assessment of impact on ancient woodland and, at this stage, stakeholders and statutory consultees have not identified any major issues.*

This statement is contentious and misleading. The University farmland received fewer comments precisely because it was rejected. The appraisal identified sound grounds for rejection and residents had every right to consider that these would be respected. Most of the grounds for rejection are unchanged, other than contestable assertions that access to the site has been resolved.

The major, majority, stakeholders are the residents in Tyler Hill, Blean, Rough Common, Harbledown and the whole Canterbury district. These stakeholders have **not** been consulted. The form of this current consultation does not offer residents the privileges evidently accorded to the promoters of the University land who have ‘*actively been engaging with the Council and other parties, and as such have provided evidence in regard to suitable access and possible transport mitigation, assessment of impact on ancient woodland*’.

Obviously the ‘promoters’ argued the case for inclusion. It will earn them and the University substantial financial returns.

There have been no parallel meetings and **active engagement** with stakeholders with contrary opinions. The Council information meetings were not ‘engagements’ of the type enjoyed by the developers. The Council cannot maintain that it has been impartial. It acknowledges that it has been influenced solely by the arguments of the promoters who have a powerful vested interest. The Council has a duty to protect its residents from such vested and powerful interests and in this case has failed to do so.

GP provision

The plan states that site would *be well located in relation to GP provision*. There is no GP provision in Blean. The nearest GP practice is the University practice which does not have the physical or staff capacity to absorb up to 8000 more patients. The scale of population increase arising from the planned housing growth will exacerbate the problems of access to GPs and other health services throughout the district and reinforces the case for a lower number of dwellings.

Significant negative impacts [of C12]

The latest SLAA says: “*While the SA has identified significant and minor negative impacts, it is determined, when reviewed alongside the SLAA on the balance of impacts and*

considering possible mitigation and design, that the majority of these impacts can be addressed.”

Mitigation is an admission of harm which cannot be avoided only reduced. In this case **(C12)** the harm is pervasive and cannot be mitigated.

- The proposal would destroy the Green Gap open countryside and result in settlement coalescence.
- The significant heritage sites and conservation areas protected by national planning laws will be irreparably damaged.
- The site is a greenfield area of more than 100 hectares of productive Grade 2 and 3 agricultural arable and grazing land which will be lost for ever.
- Loss of such a large, well-used, significant open space cannot be “reprovided” – it is an irreplaceable, substantial, local, environmental, rural, asset and amenity, no mitigation can replace it.
- Flood risk has a positive assessment in the SLAA –experience of those who have lived in the area for many years suggests that the SLAA is incorrect. The majority of the site is London Clay (Landscape Character Assessment and Biodiversity Appraisal 2020) not free-draining and liable to flooding. Planning advisors say that to make the site viable for thousands of houses, two new schools, paved areas and tarmac roads may be virtually impossible to prevent surface flooding. Councils are increasingly facing flash-flooding compensation claims.
- It would be a car-dependent development (even with additional buses).
- The two new access points on Whitstable Road, one using the bridleway (which is in a Conservation Area) opposite Kent College and one through Blean Primary both feed through the narrow gap between Blean Primary School and the University playing fields. These two access points are intended to serve 2,000 houses, two schools, commercial development with potentially 4,000 cars and large numbers of delivery vans – funnelling more traffic on to an already busy road. Traffic within the development will be a potential source of conflict.
- Whitstable Road and Rough Common Road would be major routes between the new houses/shops/offices and Canterbury. Neither road is suitable for the substantial increase in traffic that generated from the development.
- The impact on Rough Common and Blean Woods Nature Reserve are not assessed in the plan.
- The University of Kent 2019 Master Plan recognises (p.166) that *‘Tyler Hill Road is unsafe for pedestrians and cyclists because of the narrowness of the lane and the numerous bends in the road that make long-distance visibility difficult’.*
- The plan says that traffic along Tyler Hill Road will be *minimised*. Since there will be development on either side of the road this cannot be assured.
- The inevitable congestion at the two new access points on Whitstable Road and Rough Common will cause traffic to divert along Tyler Hill Road which at peak moments is already used heavily. This will transfer to Calais Hill, Wood Hill impacting St Stephens
- The junction between Tyler Hill Road and Blean Common has had several incidents. More traffic could cause further significant negative impact.
- Hackington Road/Radfall Rd/Thornden Wood Rd will be a major route between the new development and the coast – putting pressure on these narrow roads leading to more road-kill around Clowes Wood and the ancient woodlands near the Bison rewilding project.
- The development would increase the population of the three villages from c. **3,700** to c.**11,000**, completely transforming the rural environment into an urban suburb with all the attendant problems.

There is no effective mitigation for any of these impacts.

Wildlife and biodiversity

The SLAA notes “Uncertainties” regarding biodiversity. It is not clear why. There is significant biodiversity evidence, with multiple protected species being sighted, studied and mapped on national data sets such as the [National Biodiversity Network Atlas](#) and [iNaturalist](#).

Blean is identified as a biodiversity opportunity area (BoA) in the Kent Wildlife Strategy. The land between Tyler Hill and Blean, north of the university, is an important wildlife area providing opportunities for enhanced connectivity projects. The urbanisation of the fields between Blean and Tyler Hill would sever the wildlife avenue between east and West Blean woods and permanently prevent further rewilding and biodiversity gain. Wild animals and rare plants decline in proximity with large populations, noise, light pollution, cars. If their habitats are destroyed, they leave or die and never return.

Heritage

There are multiple heritage sites and conservation areas in and adjoining the **C 12** site. They include Listed Buildings, Scheduled Monuments and ancient archaeology in the middle of the site, as well as Listed Buildings next to the two proposed access points on Whitstable Road. **The Crab and Winkle Way / Roman Salt Road a Millenium project of national importance and a designated National Cycle Route will no longer be a rural retreat for walkers and cyclists but an urbanised pathway.**

Farmland

Recent shocks to the food supply chain such as the covid pandemic, the war in Ukraine, changed relations with the EU, have demonstrated the fragility of the food supply chain and the importance of food security.

The development of the University of Kent farmland will destroy over 100 hectares of Grade 2 and 3 productive agricultural land, which provides livestock grazing and arable crops (wheat, barley, rape seed and beans). Climate change, supply chain disruption and tightening global trade all mean that more food should be produced in the UK. Agricultural land needs to be protected and enhanced to ensure food security. The Plan recognises this in Policy DS12 but it has not applied it to this proposal.

Preservation of productive, environmentally, socially important farmland is another compelling reason why this proposal should be withdrawn.

Significant investment in movement and transportation infrastructure is needed to support delivery of the new rural settlement.

The plan identifies some of the critical sites for **significant infrastructure** investment but not all. The developer is expected to cover these investment costs as well as the extensive infrastructure requirements for the site itself, plus construction of two new schools and a sewage works and ‘Proportionate land and build contributions towards early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure’. All these up-front costs are likely to produce intense pressure on the desired housing mix and undermine the commitment and ability to deliver affordable housing. Whatever the plan may say developers exercise power in execution. The question needs to be

answered – is this proposal actually viable economically and from a social and environmental cost benefit perspective in realising the housing goals of the Council?

Design and layout.

Conserve and enhance historic field patterns and features, including the earthworks at St Cosmus and Damian church (Scheduled Monument) and other isolated boundaries and features representing the Medieval landscape pattern.

This is a worthy assertion but is not compatible with the scale of construction envisaged and thus not achievable. In any case what does it mean? The object of the plan is to build intensively on the fields – large scale building from the outset will permanently eradicate fields and features so that *“After-comers cannot guess the beauty been”* (Gerard Manly Hopkins).

The **St Cosmus and Damian church (Scheduled Monument)** will be marooned in contemporary housing as will the listed buildings currently in distinctive rural settings. Nor can **field patterns and features** possibly be **conserved and enhanced** except in the world of Alica - *“If I had a world of my own, everything would be nonsense. Nothing would be what it is because everything would be what it isn't. And contrariwise, what it is, it wouldn't be, and what it wouldn't be, it would”*.

Conserve the PRow network across the site ensuring key views from the network are protected and that the network provides multiple benefits such as being designed as part of a green ecological corridor

Sadly, this is another ‘through the looking glass’, marketing statement, designed to avoid the reality of what will happen. Footpaths may be retained but they cannot be ‘conserved’. At present they meander through open countryside fields and woodland with abundant experience of wildlife, birds and biodiversity. In the future their identity will be lost in a sterile urban environment. The very concept of having to ‘design’ a **‘green ecological corridor’** as though this would be a gift and benefit from the project is a form of green washing when a natural (not designed) extensive **‘green ecological corridor’** already exists and needs no ‘design’. It is not a ‘corridor’ but an ample ecological space. No ‘designed’ **corridor** can replicate it. If the Council is genuinely committed to sustainability and *‘supporting the recovery of nature, improving environmental resilience and providing significant increases in biodiversity’* it will withdraw this proposal recognising that it contradicts its vision and strategy.

(e) Minimise traffic flow onto Tyler Hill Road in both directions

Residents are puzzled about how this can be achieved. While traffic from the south of the urban estate may all be ‘funnelled’ on to the Whitstable and Rough common roads, building is also planned on the north side, which can only exit on to Tyler Hill Road. The road is really a country lane as described in the University master plan. It is already used increasingly as a ‘bypass’ or rat run and the congestion on the Whitstable road will increase this, as indicated above, diverting traffic along Tyler Hill Road to Calais Hill, Wood Hill impacting St Stephens

proof error in the plan document) **(e)!!! should be (g)**

Provide highways improvements to Rough Common Road

Rough Common Road, a residential area, is already a busy, at peak times, congested, thoroughway. The quantity of additional traffic generated by the new urban estate will mean that congestion will be constant. The plan gives no idea of the nature of the **improvements** nor the impact on the

environment (pollution, noise, increased accident risk in a residential area) quality of life and health of the residents. The number of new homes already approved for Canterbury will inevitably increase traffic on Rough Common Road to a level for which it was never designed, the development of C 12 will be a breaking point.

C12 should be withdrawn to enable Rough Common to survive as a 'liveable in' community.

5. Phasing and delivery

Provision of new high quality waste water treatment works at an appropriate location within the site (a) Waste water treatment works should be delivered at the earliest possible stage in the development.

Sewage works raise issues not addressed in the plan.

- Where will the sewage works be located?
- How will the large sewage works associated with 2000 houses, two schools, commercial development be separated from the dwellings?
- What does 'earliest possible' mean - before any other development?
- Will the treatment works be adopted by Southern Water, or will the estate have any liability for maintenance in addition to their water rates?
- How often and to where will sludge be removed?
- What storm overflow provision will be made?
- Will this and 'treated water' be directed into the Sarre Penn and what implications does this have for the proposed Broad Oak reservoir and any seepage into the aquifer?
- How will compliance be assured noting that on 18 November 2021, the Environment Agency and Ofwat announced major investigations into potential widespread non-compliance by water and sewerage companies at sewage treatment works?
- What environmental risk assessment has been carried out before making the proposal?

Blean school and phasing

2.18 A new 2FE primary school will be needed to serve new residents, along with the re-provision of the existing Blean Primary School.

b) Secondary access should be delivered at an early stage of the development and, in any case, prior to occupation of 300 dwellings.

(h) The new facility for Blean Primary School should be provided prior to the occupation of 25% of the total dwellings. The new facility must be operational prior to redevelopment of the existing school facilities.

These two paragraphs (b and h) are confusing. If secondary access is to be delivered at an early stage 'prior to the occupation of 300 dwellings', the assumption must be that the existing Blean Primary school will have been demolished and a replacement completed. However, para (h) states that the new facility must 'be operational prior to redevelopment of the existing school facilities'. Which school is the Blean Primary here the new or the old? What is the planned sequence?

Many parents are dismayed at the prospect of the demolition of the existing Blean Primary School part of which probably ought to have listed building designation. There is also considerable uncertainty about the policy, resourcing, catchment area, selection implications of two primary schools in such close proximity.

There is confusion in the plan. In section 2.18 the reference is - 'A new **2 FE** primary school .. to serve new residents, along with the re-provision of the existing Blean Primary School'.

