

# Canterbury District Local Plan to 2040

Response from a resident on 13<sup>th</sup> May 2024

:

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## Vision for the district

### Do you have any comments on the vision?

Before starting out on the response to the Local Plan for Canterbury, a basic question has to be asked: Can Canterbury take any more houses? It is not as though none are being built. There are already 9,000 proposed in this plan with 4,000 at Mountfield, 800 north of Hollow Lane and 2,250 at Merton. Houses are proposed north of Cockerling Road, at Milton Manor, Rough Common and Brooklands Farm. Altogether, 15,000 have received approval. The medieval city of Canterbury shows all the signs of stress. Its roads are constantly being repaired, with endless hold-ups and diversions which frustrate motorists, there are perpetual traffic jams and queues at Wincheap and Riding Gate, there is a shortage of doctors and dentists and pressure on school places.

The C12 plans for development on land north of the University is one further example of the impossible pressure being placed on the City. This development contradicts every element of the strategic objectives for a Thriving Environment and Improved Connectivity. Plans for 2,000 houses on the C12 development site will result in concreting over a virgin green field site in an area of thriving biodiversity, abundant nature, wildlife and birdlife, ancient woodland, agricultural land and fresh water habitat. The C12 development plan will DESTROY existing "high quality open space" - not create them and it will not protect "existing valued open spaces" for future generations to enjoy. Instead, the "existing valued open space" between Tyler Hill and Blean will no longer be there for future generations. Talk of a separating the two villages by a 'green gap' is specious since there is already a gap of nearly half a mile between the two villages. The C12 plan will not preserve "important habitats and landscapes"; it will not support "the recovery of nature"; it will not improve "environment resilience" nor will it provide "significant increases in biodiversity." It will result in exactly the opposite. What was thriving nature, important habitat for skylarks and the rare crested newt and landscape and existing biodiversity, will be bulldozed, concreted over, and gone forever as a result of this development. Moreover, massive construction over many years will have a significant impact on the water quality of the Sarre Penn river, destined to flow into the proposed Broad Oak

Reservoir. It will consequently carry with it nitrates and untreated chemicals and the water, which in the Local Plan is billed to provide 'leisure activities' for the people of Canterbury, will thus be poisoned.

Furthermore, the development is planned on land that is already prone to flooding with poor drainage. The development of a 2,000 house car-dependent settlement will not "improve air quality" nor will it "respond to the challenges of climate change": it will contribute to an increase in car use where the proposed 'hopper bus' is inadequate and, if it is anything like its European cousin, extremely poky and uncomfortable. Noise and light pollution in an area which is currently rural and unspoiled will inevitably increase. The C12 development is completely incompatible with the Environmental objectives in the Vision and should be removed from the District Plan.

## **Strategic objectives for the district**

### **Do you have any comments on the strategic objectives?**

#### **Chapter 1:21**

This section of the Local Plan refers to Canterbury's rich heritage. The world-famous cathedral, St Augustine's abbey, birthplace of the Christian church, St. Martin's church, continuously used by Christian worshippers since its foundation in the sixth century make it one of only 33 World Heritage Sites in the UK. A city with monuments of such rich historical importance must surely qualify Canterbury for exception from this burdensome housebuilding plan. The Plan itself acknowledges this when it states in C8 'The Council will seek to protect, enhance and capitalise on the City's status as a World Heritage site'. In what sense is it 'enhancing' the City by building excessive numbers of houses and creating unreasonable pressure on what is still a medieval walled city with medieval infrastructure? If Canterbury does not qualify for 'exception' which city does? It is widely believed that the City Council's present reluctance to apply for 'exception' from the housebuilding obligation is due to a fear that if rejected by central government, the Planning Inspector will instead impose an even heavier quota. There is no evidence for this and in pressing ahead with the claim for 'exception' the Council has nothing to lose if the claim is rejected and all to win if it is accepted.

The C12 plan has created massive resentment towards the University in local communities (Tyler Hill, Blean, Rough Common) which traditionally lived symbiotically with the University. The proposed sale of land by the University for mass development with callous disregard for the lives and wellbeing of surrounding communities and zero consultation is seen as a betrayal. It will be very hard for the University to recover relations with surrounding communities if this development goes ahead. In addition, there are grounds for thinking that the University has imposed excessive pressure on the Council, making use of a London-based firm of lawyers to argue its case, despite being in an impecunious state. This is in defiance of the Nolan principle which requires cities to make public any lobbying which has taken place.

The proposed C12 development will destroy an area of rich cultural heritage and historical relevance. At the centre of the land is the ancient Blean parish church of St Cosmus and Damian, dating back to the 13th Century. In the fields next to Blean Church is the site of a Roman villa, a 13th century manor, and a Medieval village which was the focus of a significant Canterbury Archaeological Society investigation between 1982-1986; a University of Kent Archaeology Department dig in 2020 discovered tools from the Mesolithic period (9,000 to 4,300 BC), a series of Bronze Age burial mounds (marked by ring-ditches), and a massive medieval enclosure ditch. Running alongside Blean Church is the Roman Salt Road used to carry salt from Seasalter to Canterbury. The C12

development is planned on the site of the Crab & Winkle Railway - the first ever passenger railway in the world with pioneering engineering overseen by great industrial revolution engineer Isambard Kingdom Brunel with locomotives built by the great Victorian railway engineers George Stephenson and his son Robert. All this cultural and archaeological heritage will be lost not capitalised by this development.

The C12 development will destroy the existing rich environment, valued landscapes, nature and biodiversity not protect and enhance it. It will harm the health and wellbeing of local communities not improve it. The presence of up to 8,000 people in the short distance between Tyler Hill and Blean will have a profoundly disturbing effect on the residents of Tyler Hill. It will alter the village's sense of identity and unity and create insecurity. There is the strong likelihood of crime and disorder in an area where buildings are so close together. The Local Plan talks glibly of a new 'rural settlement' but this concept is totally artificial. Settlements cannot be created overnight by piling up to eight thousand people from different backgrounds and with different life experiences together in close quarters. Settlements take years, even centuries to develop. By inserting a new community between the villages of Blean and Tyler Hill all that results will be an extended piece of ribbon development. Furthermore, relations between the residents of the 'old' and the 'new' villages will be very hard to establish.

## **Policy SS1: Environmental Strategy for the district**

### **3. Do you have any comments on this policy?**

The C12 development plan is completely contrary to the Environmental Strategy for the District. The green fields, ancient woodland, streams, ponds and hedgerows in the area proposed for the development are rich in biodiversity and provide a habitat for many rare and endangered species. Over 60 species of birds have been recorded in the area in the last 12 months, including sky larks, yellow hammers and swifts (on the RSB Red List), nightingales, fire crests, linnets, gold crests, tawny owls, kestrels, buzzards, kingfishers (on the Sarre Penn stream), sparrow hawks, stonechats, siskins, redwings and rare sightings of a black kite and honey buzzard. Protected species of brown long-eared bats and pipistrelle bats roost near the Church and hunt for food in the woodlands, meadows and along the stream. Hedgehogs, badgers, foxes, field mice, rabbits, bank voles, weasels, grass snakes and slow worms also live in the area. The rare Great Crested Newt - a protected species, are in ponds on the University site, close to the proposed development access points. The habitats of countless birds, mammals, reptiles and amphibians will be destroyed, or severely disturbed, as a result of this massive development: birds and wildlife not killed will be so disturbed they will leave and never come back. This will result in a net loss of biodiversity: not a 20% gain. To pretend otherwise is completely absurd and worse still, dishonest.

The development will permanently sever connectivity and wildlife corridors between the East and West Blean woodland complex and prevent any further rewilding and enhancement of biodiversity as proposed in the Kent Wildlife Strategy. This is in contradiction to page 13 of the Local Plan which states that 'the Council will continue to work with partners to explore promotion of a Stour Valley Regional park and support the extension and *improved connectivity* of Blean Woodland complex'.

The C12 development is also on a site of rich cultural and historical heritage, including the 13th century St Cosmus and St Damian's Church, the site of Roman, Bronze Age and Medieval archaeological remains, the Roman Canterbury to Seasalter Salt Path, and the Canterbury to Whitstable Crab and Winkle railway. These will all be threatened by the development.

## **Policy SS2: Sustainable Design Strategy for the district**

The proposed development of 2,000 houses on the C12 site would swell the current population of 3,700 in the three surrounding villages to an estimated 10,000 people. The local area does not have the health care facilities (GPs/ hospitals), roads, waste management and water supply - to support such a huge increase in population. The proposal is deliberately coy about waste management, calling it 'waste water management' when what it means is sewage works. This raises a number of questions: Where is the water to come from in a water-stressed area? How will the solids be disposed of? Drainage is already a serious problem in this area. What effect will the nearby presence of a sewage works have of the value of local houses? Will residents be troubled by a persistent bad smell?

The new development will be largely car-dependent according to the December 2022 Strategic Land Availability Assessment (SLAA), contributing to increased traffic, air, noise and light pollution. The development will destroy existing natural green spaces, fields, streams and woodland, which cannot be replaced once they are concreted over and bird and animal life will not return once their habitat has been destroyed, or severely disturbed. The C12 development proposal is not sustainable in any sense of the word.

## **Policy SS3: Development Strategy for the district**

1.44: It is incorrect to say that the addition of the C12 development site north of the University was a result of *"responses to previous consultations."* The addition of this site was completely opportunistic: the University is in financial crisis and needs revenue, and Canterbury City Council needed to find a new site for houses after the Adisham site was removed from the previous District Plan. In the 2020 'call for Land' the University land was not considered suitable for inclusion, on the grounds that access was inadequate. What has changed since then? Access and exit will still be on to the Whitstable Road, which is already heavily used, despite the planned demolition of Blean School. The other access point will be opposite Kent College, at the end of the Crab and Winkle Way, where it will conflict with school traffic, parents collecting their children, buses, cars and lorries. Both exit points will be highly dangerous to pupils and frustrating for motorists.

1.45: *"In planning positively to meet the growth needs of the district, the strategy seeks to protect the countryside and rural character of the district from inappropriate development"*: this is precisely the opposite of what is being proposed in the C12 development. Countryside of important ecological, historical, and cultural significance will be destroyed as a result of this development. The "rural character" of the villages of Tyler Hill and Blean will be totally destroyed by the creation of an urban sprawl which will join two very distinct villages. The C12 proposal is a highly "inappropriate development" for this area.

SS3: 2: *"Canterbury Urban Area will be the principal focus for development in the district. New development will be supported on suitable sites within the urban area."* The new C12 site is not within Canterbury Urban Area. It is a "rural settlement" site that will be completely car-dependent and does not meet any of the strategic objectives outlined in the Vision.

SS3 6: Under the district settlement categories, Tyler Hill qualifies as a village *"outside of the urban areas and rural settlement boundaries."* It is *"designated as countryside where development will generally be restricted"* & priority given to *"protecting the rural character of the district."* This is totally contrary to the C12 development which will join Tyler Hill to Blean in an urban conurbation of 10,000 people despite the Plan's assurance that the 'coalescence with Blean ' will be avoided (3f).

## **Policy SS4: Movement and Transportation Strategy for the district**

It is impossible to see how the C12 development complies with the SS4 Movement and Transport Strategy. According to the 2022 Strategic Land Availability Assessment (SLAA), the C12 site will be a "large-scale car-dependent development." Contrary to SS4 1.49 which prioritizes focusing growth in urban areas - Canterbury in particular - as the *"greatest opportunities to plan for a switch to sustainable transport,"* the C12 site is a rural car-dependent settlement potentially adding up to 4,000 more cars to already overcrowded roads. Access to the site is severely limited with access points on Whitstable Road near the Rough Common roundabout, and at the site of Blean primary school, adjacent to three large schools. This would dramatically increase traffic, air, and noise pollution along the Whitstable Road and would make Rough Common a main access route into Canterbury, with two new slip roads to the A2 at Harbledown included in the District Plan. There will be dramatically increased traffic into Canterbury from the development, creating more congestion at St Dunstan's roundabout and on St Stephen's Hill which is also next to a major school. Tyler Hill Road will be the main access road for the developments on the north side of Tyler Hill Road (which cannot be reached by Whitstable Road) - this is currently a very narrow, windy, rural road which is already very dangerous for pedestrians and cyclists. Furthermore, there will be development on both sides of the road so that it will not be possible to 'mitigate' the traffic on Tyler Hill Road which will inevitably be used as a cut-through, adding massively to traffic and pollution in Tyler Hill village dramatically altering its rural character, making it very dangerous for the residents living along Tyler Hill Road and Calais Hill (where there is no footpath). This is one further example of how the pursuit of an excessive housing quota has blinded the composers of the plan to all consideration of the local residents. Cycling from Tyler Hill and Blean/ Rough Common into Canterbury is already very dangerous, it is inconceivable how the addition of more cars from the C12 development will make it safer. The Crab & Winkle cycle path will probably be unusable during the lengthy construction period and once the construction is over, it will be reduced to an urban footway between houses. This is despite the cheerful assertion in the Plan that the footpath will be 'protected' and recognised as 'part of a green ecological corridor' (3i). On the contrary, the Blean will lose a valuable historic asset which is widely used and loved.

## **Policy SS5: Infrastructure Strategy for the district**

The 2040 District Plan & existing new housing projects will increase the population of Canterbury District by 70,000 from 157,000 to 227,000 by 2040 which is not sustainable. Based on the planning figure in Policy SS3, Canterbury plans to build 1,149 new dwellings every year for the next 20 years

(2020-40) to meet housing needs. This would mean a total of 25,278 dwellings built over this period. However, according to the ONS projected change in number of households for the period 2018-28, there will be an increase of 4,885 households in Canterbury (from 66,094 households in 2018 to 70,979 in 2028) [ONS Figure 3: Projected percentage change in number of households for local authorities in England, 2018 to 2028]. This would imply a housing need of 488.5 new dwellings per year for the 10 year period (2018 - 2028) & assuming the same rate of growth in households, a need for 9,770 new dwellings in the 20-year period from 2020-40. The District Plan figure of 25,278 new dwellings over the next 20 years (2020-2040) therefore seems grossly exaggerated and not in line with actual housing needs. Existing infrastructure for the massively increased population in the villages of Blean and Tyler Hill due to the C12 site (from a current population of 3,700 to 10,000) is grossly inadequate. Roads, sewage, waste management and water supply are inadequate to cope with such a population increase. Healthcare and dentistry services for the whole of Canterbury are already grossly insufficient. There is already an acute shortage of GPs in Canterbury - with one GP for 2,294 patients, an increase of 7% since 2019 - and appointments are very difficult to secure. Maintaining GPs rates at the same inadequate level would require an additional 30 GPs in Canterbury to meet a population increase of 70,000 & similar number of dentists. There are no plans for a new or upgraded hospital in Canterbury, or to restore the A & E department. The Vision of "healthy communities" is more likely a nightmare.

## **Policy DS4: Rural housing**

The C12 development site is in a rural area (countryside) outside of the settlement boundaries of urban areas, rural service centres and local service centres. According to Policy DS4, "housing development in the countryside, is generally considered to be unsustainable and will only be supported in very limited circumstances." Policy DS4 (1) states that proposals for the development of "Rural Exception Sites" will only be permitted where :"(a) They are designed to meet an identified affordable housing need, and it is demonstrated that this need cannot be accommodated in any other way;" this criteria has not been met for the C12 rural settlement development. There is grossly insufficient data to show that the addition of 2,000 houses on land north of the University meets "an identified housing need", nor that it "cannot be accommodated in any other way." In fact, ONS household projections for the period 2018-28 show an increase of 4,885 households in Canterbury (488 per year). Assuming the same growth in households for the period 2020 - 2040, there will be a need for 9,770 new dwellings in Canterbury. How does CCC's planning number of 1,149 new dwellings/ year (25,278 dwellings from 2020-40) bear any relation to the ONS household projects for the same period? DS4 (d) states that development should be "proportionate in scale to the existing settlement, appropriately accessible by sustainable transport, including by walking and cycling, and the need for, the development outweighs any harm;" none of these criteria are met by the C12 proposal (see Section C12 above). The C12 development will disproportionately increase the local population from 3,700 to 10,000; it will cause immeasurable harm to the local environment, cultural heritage, and communities; and it will be a largely car-dependent site massively increasing traffic, air, noise, and light pollution in an unspoiled rural area.

## **Policy DS13: Movement Hierarchy**

As mentioned previously (see Section C12), the C12 proposal is for a new rural settlement in an area which is largely car-dependent. Even with ambition to improve public transport links to this area, it is inconceivable that the majority of new residents will travel by foot, bike, or bus. To reach the C12 development site, residents must go up and down two major hills (on either side of the

development) which will deter many from travelling by foot or bike (including those who are elderly, infirm, and disabled and mothers with small children). The roads into Canterbury (via Whitstable Road and St Stephen's Hill) are currently narrow, over-crowded and dangerous for pedestrians and cyclists. The bus service to this area (Tyler Hill, Blean, Rough Common) is currently infrequent, with no buses in the evenings and few at weekends. There are no guarantees that the bus service will be sufficiently upgraded to meet the needs of 2,000 new households. It is inevitable that the C12 development will contribute to a massive increase in traffic, congestion, air, noise, and light pollution in a currently unspoiled, rural area. The C12 development is incompatible with Policy DS13.

### **Policy DS14: Active and sustainable travel**

As above, Policy DS14 is incompatible with the C12 development site. The C12 site is currently ill-served by public transport and the roads are dangerous and inappropriate for walking and cycling. C12 is a huge development site with inadequate access to sustainable transport options. It will inevitably lead to increased traffic and car use, congestion, air, noise, and light pollution.

### **Policy DS16: Air quality**

The C12 development will undoubtedly contribute to air pollution in the Tyler Hill/ Blean area due to increased car use and air pollution from the construction. This reduction in air quality will mean a reduction in the value of houses in the neighbourhood. It could also lead to an increase in bronchial and breathing problems, already a source of national concern, in an area where there is an insufficiency of doctors and medical services.

### **Policy DS17: Habitats of international importance**

Policy DS17 states that: "Proposals for development which would materially harm the scientific or nature conservation interest, either directly, indirectly or cumulatively, of sites designated as a Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR) and Marine Conservation Zones (MCZ) for their nature conservation, geological, or geomorphological value will not normally be permitted." The C12 development site is in the middle of the Blean Woods area, surrounded by various parts of the National Nature Reserve. The development will have a serious impact on nature conservation in the NNR through loss of natural habitat, birds, wildlife, woodland, and negative impacts on the Sarre Penn stream. The C12 development site is in an area of great ecological sensitivity surrounded by the Blean wood complex and parts of the National Nature Reserve. It should be a protected area and no development permitted in line with Policy DS17.

### **Policy DS18: Habitats and landscapes of national importance**

As in Policy DS17 above, proposals for development in National Nature Reserve areas "will not normally be permitted". The C12 site lies on the edge of a National Nature Reserve and hence should not be permitted for development. DS17 also states that proposals for development "which would result in the loss, or damage to, or threaten the future retention of, irreplaceable habitat such

as ancient woodland and ancient or veteran trees will be refused" unless there are "wholly exceptional reasons" where the needs and benefits "clearly outweigh the loss." The C12 development site is on land containing ancient woodland which cannot be replaced. The impact of such a huge development on the root structure and drainage systems of these trees cannot be mitigated and as noted in DS4 above, there is no evidence in the Draft Plan of any "exceptional reasons" why there is a need for 2,000 houses on this site. DS17 also states that where proposals "may affect protected and priority species, including great crested newts, or priority habitats" they must follow Natural England and other partners' advice and guidance and comply with the mitigation hierarchy of avoidance, mitigation or compensation. Several protected species are known to be present on the C12 development site, including: Great Crested Newts, brown long-eared bats and pipistrelle bats, sky larks, yellow hammers and swifts. These have all been documented on the National Biodiversity Network Atlas and iNaturalist. The University of Kent has internationally renowned scientific ponds on the development site where it is studying Great Crested Newts. Given the non-essential nature of the housing proposal for site C12 - without sufficient evidence to show the need or public benefit of this housing - development on this site should be avoided to protect the important habitats, ancient woodland, National Nature Reserve and protected species on the site.

## **Policy DS19: Habitats, landscapes and sites of local importance**

According to Policy DS19: Designated "Green Gaps" provide protection against coalescence between settlements, which would permanently harm the character and identity of individual settlements." It is incomprehensible that the C12 development site could be included in the 2024 District Plan when it lies in the middle of two designated "Green Gaps" between Blean and Rough Common and Tyler Hill and Canterbury. DS19 stipulates that "only proposals for sports and recreation uses will be permitted" within the designated "green gaps" and only where the development "(b) Does not significantly affect the open character of the Green Gap, or affect the separating function leading to coalescence between existing settlements." The proposed C12 development is completely contrary to policy DS19 as it will result in the coalescence of Tyler Hill, Blean and Rough Common into one sprawling urban mass that will totally destroy the rural character of these three distinct villages and the tranquility of the countryside. The green space north of the University will be dominated by an urban development of more than 2,000 houses and other buildings and the purpose of the development will not be restricted to "sports and recreation," but will be for residential, commercial and business purposes. Moreover, the C12 site lies next to the Blean Woods Local Landscape Designation Area where proposals for development "will only be permitted where they conserve and, where appropriate, enhance the special qualities of the landscape." The construction of 2,000 houses and other buildings in a massive urban sprawl on an existing green space of great ecological, cultural, and historical significance will not conserve or enhance the "special qualities of the landscape." The 2020 Landscape Character and Biodiversity Appraisal refers to the "tranquility" and "quiet, peaceful" and "strong rural character" of the C12 site which is "vulnerable to development." This must be protected: C12 must not go ahead.

## **Policy DS20: Flood risk and sustainable drainage**

According to the Canterbury District 2020 Landscape Character Assessment and Biodiversity Appraisal, the C12 site is largely located on London Clay which is considered liable to flooding, not



free-draining and unsuitable for large-scale development. Indeed, many planning applications for stand-alone buildings in Blean have already been turned down because of poor drainage and the risk of flooding. The construction of more than 2,000 concrete buildings, tarmac roads, pavements, driveways, and parking areas will create huge problems for water drainage on the site: some planning consultants say it will be virtually impossible to guard against surface flooding. Given the increased risk of flooding across the UK due to climate change and the huge costs entailed in flooding-related insurance and compensation claims, it is inconceivable how the C12 development site could be included in the 2024 District Plan. The C12 site is at high risk of flooding with poor drainage: it represents very poor flood planning by Canterbury City Council to include it in the 2024 District Plan.

## **Policy DS21: Supporting biodiversity recovery**

According to DS21 all new developments should consider a 20% net gain in biodiversity and all development of over 300 houses should have minimum 20% tree cover. As the C12 site is an existing site of unspoiled natural beauty consisting of ancient woodland, open fields, streams, ponds and hedgerows - all of which will be destroyed by a massive development of 2,000+ buildings - it is frankly dishonest to talk about 20% biodiversity gain for this site. The C12 site currently provides a habitat for many rare and endangered species. Over 60 species of birds have been recorded in the area in the last 12 months, including sky larks, yellow hammers and swifts (all on the RSB Red List of endangered birds), nightingales, fire crests, linnets, gold crests, tawny owls, kestrels, buzzards, kingfishers (on the Sarre Penn stream), sparrow hawks, stonechats, siskins, redwings and rare sightings of a black kite and honey buzzard. Protected species of brown long-eared bats and pipistrelle bats roost near the Church and hunt for food in the woodlands, meadows and along the stream. Hedgehogs, badgers, foxes, field mice, rabbits, bank voles, weasels, grass snakes and slow worms also live in the area. Great Crested Newt - a rare and protected species - can be found on the site, with internationally renowned scientific ponds for studying the newts located on University land, close to the proposed access points. The habitats of countless birds, mammals, reptiles and amphibians will be destroyed, or severely disturbed, as a result of this massive development: birds and wildlife whose habitat is disturbed and leave the area during the prolonged construction period will never come back. This will result in a net LOSS of biodiversity: not a 20% gain. The development will also permanently sever connectivity and wildlife corridors between the East and West Blean woodland complex and prevent any further rewilding and enhancement of biodiversity as proposed in the Kent Wildlife Strategy.

## **Policy DS22: Landscape Character**

The 2020 Landscape Character & Biodiversity Appraisal describes the historical, rural, agricultural, peacefulness, tranquility and dark skies of the C12 development site between Blean and Tyler Hill north of the University (Amery Court Farm). The LCA lays out clear directions for the landscape and development management of this site. This includes: conserving & enhancing biodiversity interest from watercourses and wetland habitats of the Sarre Pen and its tributaries; enhancing fragmented areas of deciduous woodland and connectivity with the rest of the wider Blean wood area; conserving and enhancing neutral and acid grassland and heathland; managing and enhancing arable fields and introducing wild-life-friendly farming methods; conserving and improving the Medieval landscape pattern & structure; increasing biodiversity through maintenance of hedgerows;

conserving historic field patterns, including the earthworks at St Cosmus and Damian Church (scheduled monument), drove roads, saltways, meadows and hedgerows; conserving the local distinctiveness of historic buildings and their rural setting, especially within the Amery Court, Blean & Tyler Hill Conservation Areas; maintaining the linear pattern of Blean and Tyler Hill villages & avoiding further infilling or extensions that would create urban sprawl; conserving the rural character of the landscape ensuring that it continues to separate Blean, Tyler Hill & Rough Common and the University of Kent to the south, and the role of the Sarre Penn Valley in relation to the Stour Valley slopes; and protecting the valued PRowS and locally promoted routes linking Canterbury City, the Blean woodlands and the coast. The C12 development is contrary to ALL the guidance in the 2020 LCA. It will result in a massive urban sprawl, destroy a rural area of peace & tranquility, disrupt Medieval landscape & field patterns, concrete over hedgerows, woodland, grassland & arable fields & destroy wetlands and waterways.

## **Policy DS23: The Blean Woodland Complex**

DS23 states that any proposal for development on surrounding the Blean Woodland Complex, including Policy C12 Land north of University of Kent "will need to ensure that development does not adversely affect the landscape, ecology or setting of the Blean Woodland Complex." However, the proposed C12 site will result in permanently severing connectivity and wildlife corridors between the East and West Blean woodland complex and prevent any further rewilding and enhancement of biodiversity as proposed in the Kent Wildlife Strategy. The C12 proposal will be permanently damaging to the Blean Woodland Complex and should not be allowed to go ahead.

The proposed C12 development will destroy an area of rich cultural heritage and historical relevance. At the centre of the land is the C13th Blean parish church of St Cosmus and Damian, a scheduled monument. In the fields next to Blean Church is the site of a Roman villa, a 13th century manor & Medieval village which was the focus of a significant Canterbury Archaeological Society investigation between 1982-1986; a 2020 University of Kent Archaeology Department dig discovered tools from the Mesolithic period (9,000 to 4,300 BC), a series of Bronze Age burial mounds & a massive medieval enclosure ditch. Running alongside Blean Church is the Roman Salt Road used to carry salt from Seasalter to Canterbury. Also running through the proposed development land is the old Crab & Winkle railway line, a site of major historical transportation and engineering significance. It opened in 1830 to take day-trippers from Canterbury to Whitstable: the first passenger railway line in the world and the first to issue passenger season tickets in 1834. The line and locomotive, the Invicta, were built by famous Industrial Revolution engineers George Stephenson, and his son, Robert. The first ever passenger railway tunnel was built under Tyler Hill in 1826, overseen by the famous 19C engineer, Isambard Kingdom Brunel. The line stopped carrying passengers in 1931 and ceased to operate completely in 1952. It was a pioneer in railway engineering with embankments, cuttings, level crossings & bridges & the significance of the Tyler Hill tunnel to British transport heritage cannot be overestimated. According to Policy DS26 the archaeological and historic integrity of designated heritage assets such as Scheduled Monuments and other important archaeological sites and their settings must be sustained & development which would adversely affect them will not be permitted. The C12 development will have a detrimental impact on an important historical site, it should not be permitted to go ahead.

## **Policy C12: Land north of the University of Kent**

The C12 plan for land north of the University is highly inappropriate, lacks sufficient data and assessment plans and should not be included in the District Plan. Most alarmingly, the C12 plan **totally contradicts** the findings from the Canterbury City Council July 2022 Strategic Land Availability Assessment and the guiding principles and commitments made by the University of Kent in its 2019 Master Plan and its 2025 Strategic Plan. It is incomprehensible what material changes have taken place between the publication of these documents and the March 2024 Draft District Plan to make both Canterbury City Council *and* the University of Kent depart so radically from their previous priorities, commitments and conclusions.

## **2022 Strategic Land Availability Assessment**

The Canterbury City Council [Strategic Land Availability Assessment carried out in July 2022](#) found the five sites proposed by the University on land to the north of the University between the villages of Blean, Tyler Hill and Rough Common to be *“technically unsuitable”* for development. It found that all the sites had major access issues, with inadequate access and limited public transport options. For all the sites, the 2022 SLAA stated that: *“The site is located within an area with limited access to day to day services and public transport therefore future occupiers would be dependent on private car to access day to day services.”* Two of the proposed sites were in a *“conservation area”* and all five sites were found to have a *“landscape impact”* *“heritage and ecology concerns”*.

None of the features of the proposed C12 site have materially or physically changed between July 2022 and the publication of the new Draft Plan in March 2024. The site is still located on, or in close proximity to, Natural England Priority Habitats, Ancient Woodland, Local Nature Reserves, the Tyler Hill and Blean Conservation Areas, the Crab and Winkle Railway Conservation Area and Blean Biodiversity Area. The physical location of these areas has not changed between July 2022 and March 2024.

The C12 site still contains Scheduled Ancient Monuments; Grade II listed buildings; archaeological sites and earthworks – all sited as concerns in the July 2022 SLAA. These historic buildings and remains have not disappeared since July 2022. The proposed C12 site is still on Grade 2 & 3 Agricultural Land – as noted in the July 2022 SLAA. This agricultural land has not been reclassified between July 2022 and March 2024.

Tyler Hill Road remains an unsuitable access road for dwellings on the north side of Tyler Hill Road. As noted in the July 2022 SLAA it is a narrow, rural, windy road with no footway, cycle path, or lighting. Tyler Hill Road hasn't changed in location or nature since July 2022: it remains an unsuitable access road for a major development. The Highway Assessment proposed in the July 2022 SLAA still hasn't been carried out. Public Rights of Way and Public Footpaths still cross the land proposed for C12 development – it remains a much-used and loved local amenity – this has not materially changed since July 2022.

## **University of Kent 2019 Master Plan and 2025 Strategy**

Moreover, the proposed C12 development is **completely contrary** to the [University of Kent's 2019 Canterbury Campus Framework Master Plan](#). The Master Plan states that as *“The University of Kent in the Garden of England”* its spatial plan for the future *“reflects the desire to renew a commitment to landscape-led planning principles. It also expresses the University's commitment to **conservation and environmental sustainability**, and to creating a campus that is **open and welcoming** to*

*neighbouring communities, the City of Canterbury and to the people of Kent.”* In her foreword to the Master Plan, the former Vice Chancellor, Karen Cox, explained that: **“We have also worked closely with local stakeholders throughout as plans have taken shape, seeking advice from residents’ associations, community groups, businesses and the wider public.”** The [University of Kent 2025 Strategy](#) includes a commitment to “Engagement, Impact and Civic Mission” stating that: **“Our civic mission goes to the heart of who we are as a university and why we are here - to serve our communities by contributing actively and sustainably to their health, wellbeing, prosperity and success.”**

The introduction to the Master Plan states that: *“the City Council has confirmed that this Masterplan fulfils the local plan requirement for a masterplan to be prepared, and will provide a bridge between Policy EMP7 and planning applications, as well as a framework for Canterbury City Council when determining development proposals.”* Stating that *“the University has a strong commitment to sustainability and carbon management, as well as an ambition to address the problem of climate change,”* the Master Plan pledges to: **“Safeguard natural habitats and nurture biodiversity to enrich the campus and the surrounding area.”**

Referring specifically to university land in the Sarre Penn Valley, the Master states: *“Providing a green setting to the north of the University as well as a more rural landscape character, this area is a major attraction to students, academic staff and visitors. Many opportunities exist here to enhance biodiversity and showcase the principles of sustainable land management, as part of the University’s offer of a green campus. These include preserving the connectivity of the bankside vegetation along the Valley as an ecohighway for fauna in the area, and linking ponds and wetlands to better reconnect the stream to its floodplain. As well as diversifying the wetland environment, this will provide a reservoir for irrigation of the sports pitches during summer months, reducing the requirements for mains water. Restoring the historic hedgerows to create wildlife corridors and managing existing woodland pockets will also diversify habitats and promote biodiversity.”* Earlier in 2016 when the University of Kent was considering a [location for its new Business School](#), the architects dismissed land north of the University as an appropriate site stating that: *“This area is highly visible from the open country side which extends northward from the campus towards Blean and development would be likely to have a significant impact upon the open character of the countryside to the north of Canterbury. The western part of the site is also identified in the Canterbury Local Plan as a ‘Green Gap’ where there is a presumption against development which would reduce the open character of this area.”*

**So what has changed??** Why has Canterbury City Council suddenly decided that the C12 development site is “technically suitable” for development and all the road access, public transport, environmental, ecological, agricultural, groundwater, cultural, and heritage concerns flagged in the July 2022 SLAA have suddenly disappeared?

Why has the University of Kent completely abandoned its civic mission to serving local communities **“by contributing actively and sustainably to their health, wellbeing, prosperity and success?”** In fact, the inclusion of the site C12 in the March 2024 Draft District Plan has had a hugely negative and detrimental impact on the health, wellbeing, and prosperity of local communities. Local residents in Tyler Hill, Blean, and Rough Common have described negative impacts on their mental health, sleepless nights, grief and depression at the prospect of losing much-loved nature and green spaces,

concerns about the future value of their properties, and real concerns about their health and well-being as a result of increased air, noise, and light pollution created by the construction of such a huge development over many years, and the massive increase in local population and traffic. They also cite concerns about increased crime, road safety – especially for cyclists and pedestrians, and the future education of their children, likely to be seriously disrupted by the development. These local communities have always lived side-by-side with the University of Kent, and many residents of the three villages are either present or former students or employees of the University. But residents now feel totally betrayed by the University and Canterbury City Council. They feel their needs, health and welfare have been totally neglected and callously disregarded by the high-handed approach of the University and the City Council and there has been no attempt of any kind to meaningfully consult with them about these plans. The level of resentment and hostility towards the University amongst local communities that have previously lived harmoniously with it is incredibly high and it is difficult to imagine how relations will ever be restored if this development goes ahead.

Finally, why has the University of Kent totally abandoned its commitment to conservation and environmental sustainability and its pledge to safeguard the green setting and rural landscape north of the University, protecting nature and wildlife, creating wildlife corridors, and promoting biodiversity in the Sarre Penn Valley? And how do the commitments in the 2019 University of Kent Master Plan provide ***“a framework for Canterbury City Council when determining development proposals”*** when in reality the University is now proposing to sell off all this land for intensive, ecologically disastrous, environmentally damaging development? How can the University have decided in 2016 that this land was inappropriate for the construction of an academic building (new Business School) and now considering selling it off for 2,000 houses and other buildings? In the final analysis one is led to the conclusion that the University is prepared to promote the destruction of a beautiful area and to cause distress and heartache to the local residents in order to get itself out of a financial hole produced by its own incompetent mismanagement.

There is an Orwellian disconnect between the very recent previous decisions and commitments of Canterbury City Council and the University of Kent and what is being proposed now in the C12 plan that is totally incomprehensible. Both institutions must be held to account to rigorously explain the data, analysis, assessment, and planning undertaken to have arrived at such a dramatically different conclusion for the future of the land north of the University in such a short space of time.

### **Comments on Policy C12**

**C12 2.16** acknowledges that *“significant investment in movement and transportation infrastructure is needed to support delivery of the new rural settlement”* - is this even feasible or affordable for Canterbury?

**2.17** states that the *“new rural settlement”* will 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”*. This is completely untrue. The new settlement will DESTROY existing areas of open space; a massive urban sprawl of 2,000 houses will join up the villages of Blean and Tyler Hill; important wildlife corridors between Blean and Tyler Hill will be

destroyed; connectivity between East and West Blean Woods will be broken; an area that is rich in biodiversity, rare and endangered plant and wildlife species will be lost forever. The ecological impact of this development on a rural area will be devastating.

**2. Design and layout: (f)** the impact on existing archaeological and historical sites will be devastating. Development all around the perimeter of the ancient church of [St Cosmus and Damian](#) will destroy its rural character and important Mesolithic, Bronze Age, Roman, and Medieval archaeological sites surrounding the Church will be permanently lost. The character of the existing [Crab & Winkle cycle path](#) along the route of the ancient Roman Salt Road between Sea Salter and Canterbury will be permanently altered – turning it from a rural cycle path to a city street. Important sites associated with the original [Crab & Winkle railway](#) – the first ever passenger railway in the world, bringing day-trippers from Canterbury to the seaside in Whitstable and featuring ground-breaking 19<sup>th</sup> century railway engineering technology - will be completely subsumed within the development.

**3. Landscape and Green Infrastructure:** this section is nothing but euphemistic jargon and doublespeak which bears no relation to actual reality. It is pure *“Alice in Wonderland”* fiction.

a) What will be the impact of an *“urban drainage network”* on the existing *“valley formation running through the centre of the site?”* This valley is formed by the Sarre Penn river (stream). What will be the impact on the Sarre Penn of such a massive urban development? How will the Sarre Penn be protected from toxic waste pollution from the construction site and subsequently, how will the water quality be preserved with such dense habitation right next to a fragile waterway?

b) A massive concrete development on an existing green field site of natural beauty and rich biodiversity will result in a biodiversity loss not 20% gain: existing animal, bird and insect populations will be profoundly negatively impacted by massive construction and loss of habitat and either killed or lost forever – once displaced, they will never return. The massive concrete development will result in the loss of ancient woodland, green fields, hedgerows, grassland, heathland, ponds, and deciduous woodland. Suggesting that the development will “enhance biodiversity” is pure fantasy. The green fields, ancient woodland, streams, ponds and hedgerows on the site proposed for development are rich in biodiversity and provide a habitat for many rare and endangered species. Over 60 species of birds have been recorded in the area in the last 12 months, including sky larks, yellow hammers and swifts (on the RSB Red List of threatened species) nightingales, fire crests, linnets, gold crests, tawny owls, kestrels, buzzards, kingfishers (on the Sarre Penn stream), sparrow hawks, stonechats, siskins, redwings and rare sightings of a black kite and honey buzzard. Protected species of brown long-eared bats and pipistrelle bats roost near the Church and hunt for food in the woodlands, meadows and along the stream. Hedgehogs, badgers, foxes, field mice, rabbits, bank voles, weasels, grass snakes and slow worms also live in the area. The rare Great Crested Newt – also a protected species – can be found in multiple locations around the area of the proposed housing development. There are [internationally-recognised experimental ponds](#) for Great Crested Newts on the University site, close to the proposed access points. The habitats of countless birds, mammals, reptiles and amphibians will be destroyed, or severely disturbed, as a result of this massive development: birds and wildlife not killed will be disturbed, leave and never come back. The development will permanently sever connectivity and wildlife corridors between the East and West Blean woodland complex and prevent any further rewilding and enhancement of biodiversity as proposed in the [Kent Wildlife Strategy](#).

d) *“Retain substantial areas of the existing tree cover and incorporate opportunities for landscape and biodiversity enhancements”* – this implies that some areas of existing tree cover will not be retained. Which trees will be retained? What will be the impact of the construction of such a massive development on the roots and drainage system of existing trees and woodlands in the area? How can the Plan “enhance biodiversity” when it will be destroying existing green fields, plants, trees, wildlife, birds, and insect populations?

e) How can the building of 2,000 houses in the middle of the Blean Woods area and Blean Conservation Area not have a profoundly negative impact on this important National Nature Reserve? The impact of massively increased traffic, air, noise, and sound pollution from a development site of 2,000 houses, 4,000 cars and potentially 7,000 more people will be immense. The proposed development site is one of enormous environmental importance and should be protected, not wantonly destroyed.

f) A huge “green corridor” already exists linking the villages of Blean and Tyler Hill to the University and City Centre. It is Orwellian to talk about “creating green corridors” when the District Plan intends to destroy them!

h) *“Minimize loss of or damage to ancient woodland at “Long Thin Wood”* implies that the C12 policy anticipates some damage and loss to this ancient woodland. Where are the details of how much woodland will be lost or damaged? *“Retain all other ancient woodland and ancient or veteran trees, ensuring they are not damaged nor is their future retention threatened”* – where is the impact assessment to rigorously demonstrate that there will be no damage to the roots, drainage system and stability of existing woodland and trees as a result of the proposed development? What will be the impact of heavy construction vehicles, air, noise and toxic waste pollution on existing woodland and trees? Will all the new trees planted by the University on the west side of the Crab & Winkle cycle path (between the Sarre Penn stream and the Church) be protected and preserved?

i) As point (e) above – how is it possible for such a massive development not to impact the Blean Woodland complex through increased traffic, air, noise and light pollution and massive construction vehicles?

j) As point b, d, and f above – how can the construction of 2,000 houses, office, commercial and businesses on a greenfield site and on the edge of a fragile watercourse (Sarre Penn stream and its tributaries) possibly *“enhance biodiversity”*? The C12 development will destroy grassland, heathland, and deciduous woodland – not enhance it; the development will further fragment pieces of woodland, not *“expand and enhance them.”* Massive construction and dense inhabitation will likely result in pollution of the Sarre Penn.

k) What are the precise plans to *“conserve and enhance historic field patterns and features”* including earthworks St Cosmus and Damian Church, and other *“isolated boundaries and features representing the Medieval landscape pattern?”* Given that all the fields surrounding St Cosmus and Damian Church contain archaeological remains and earthworks from the Mesolithic, Bronze Age, Roman, and Medieval periods, how exactly can these be preserved and enhanced in the middle of a 2,000 house + office and commercial building planning development? It seems incompatible to preserve archaeological remains and landscape features, while at the same time proposing to concrete over them. Like the wildlife – once concreted over – they will be gone forever.

l) *“Preserve PRow network across the site ensuring key views ...are protected”* and ensure that the PRow network is *“designed as part of a green ecological corridor.”* This is pure lunacy! The public footpaths across the proposed development site are only valuable because they provide a right of

way through an area of great natural beauty and rich historical and cultural heritage. A public right of way through a concrete development site is just a pavement down a street of housing – to call it a “PRoW network” is completely disingenuous! The “key views” from the footpaths will hardly be preserved when all that can be seen is row after row of buildings. The “green ecological corridor” already exists – it is the unspoiled green land between Tyler Hill and Blean to the north of the University. The C12 Policy plans to concrete this over with buildings – it will hardly be a “green ecological corridor” anymore. This is pure nonsense!

m) *“Provide visual integration of development edges, through native wooded boundaries and mature trees to provide screening and reduce visual and landscape impact.”* This is absurd. The construction of 2,000 houses, office buildings and commercial sites will completely destroy any “visual integration”; existing wooded boundaries and mature trees will be threatened by the bulldozers and intensive construction; the “visual and landscape impact” can hardly be minimized when the policy proposes covering a green-field site with over 2,000 buildings.

#### **4. Access and transportation:**

a) The existing Crab & Winkle cycle route will be completely ruined by this development. It will become a cycle path down an urban street and will totally lose its rural character. The cycle path will likely be unusable for long periods during the on-site construction. The impact of air pollution on cyclists from the construction and increased cars will be detrimental. How are *“new and improved walking and cycling connections to Blean, Tyler Hill and Broad Oak”* compatible with the massive increase in cars on small, rural roads as a result of this development?

b) Plans for a *Transport Hub* to facilitate *“good access to public transport facilities”* and a *“new bus route”* connecting the residential area to Canterbury West station and the City Centre are aspirational at best. There is no guarantee that this new development will be well-served by good public transport, or that people will choose to use it. Public transport services to Tyler Hill, Blean and Rough Common (apart from residents living on the Whitstable Road) are currently woefully irregular and inadequate. It is inevitable that this “rural settlement” will also be a “car-dependent” one as the 2022 SLAA predicted.

d) the primary access points to the site at the junction of Whitstable Road and Rough Common Road and at the site of the current Blean Primary School will massively impact on traffic flows in these areas. There are three large schools in the immediate vicinity of these access points (St Edmunds/ Kent College and Blean Primary School). How will the increased traffic at the access points impact on air quality and road safety for school children at these establishments? How will increased traffic, including heavy construction vehicles during the construction phase, make it safer and easier for pedestrians and cyclists in these areas, including for school children? How will a massive increase in cars, air and noise pollution, especially during the long construction period, impact the health and wellbeing of residents of Blean and Rough Common?

e) How will the C12 policy minimize traffic flow onto Tyler Hill Road in both directions, when significant sections of the new development will be on the north side of Tyler Hill Road with no access to Whitstable Road, except via Tyler Hill Road? How can the District Plan guarantee that motorists will not use Tyler Hill Road as a cut-through to St Stephen’s Hill and Canterbury city centre? What will be the impact of massively increased traffic in Tyler Hill, especially down Tyler Hill Road and Calais Hill where cars already go dangerously fast and there is no pavement for pedestrians or cycle lane for cyclists? What will be the impact on the “rural character” of the village of Tyler Hill, as



characterized by the Canterbury District Settlement Hierarchy? How will a massive increase in cars, air and noise pollution impact the health and wellbeing of residents of Tyler Hill? Tyler Hill Road is a very narrow, windy, rural road which is already very dangerous for pedestrians and cyclists, with no footpath, cycle path, or lighting: how will it cope with the increased traffic from the C12 development?

f & e) *All-movement junction at A2 Harbledown through additional slip roads and highway improvements to Rough Common Road*: how will the C12 policy impact on the health and well-being of residents of Rough Common and Harbledown? What will be the impact on air quality with the massive increase in traffic? How can this road be made safer for cyclists and pedestrians when it's already over-crowded and cars go too fast?

h) Provide a *"transport assessment to demonstrate the connectivity of the site with the existing highway network"* and necessary mitigation measures. Why is the transport assessment only happening *after* this site has been included in the District Plan? Shouldn't a comprehensive transport assessment be a precursor to including the C12 site in the District Plan? There is insufficient information, data, and analysis of the transport implications of this site to include it in the current District Plan.

### **5) Phasing and delivery:**

How does the Council intend to provide access to the construction site via the Blean Primary School access point before a new Blean Primary School has been constructed? What will happen to the school children at the current Blean primary school while the new school is being constructed? What will be the impacts on primary school children of the new construction? Has there been an assessment of air quality impacts from heavy construction vehicles on the primary school? 5(b) states that "secondary access should be delivered...prior to occupation of 300 dwellings" but 5(g) says that the new primary school site should be transferred to KCC "prior to the occupation of 100 dwellings" and 5 (h) says that the new Blean primary school should be ready "prior to the occupation of 25% of the total dwellings." Which is it? It is conceivable that secondary access will be needed to the site before the new primary school has been completed – potentially resulting in serious disruption of the students' education. Moreover, there is a discrepancy in the development plan (under Development Mix). Point 1 (3) (ii) states the "provision of a new 3FE primary school", while point 1 (3) (iii) states "re-siting and provision of a new 2FE primary school" to "replace existing capacity at Blean Primary School." Which is it? Does the City Council intend to provide a 2FE or a 3FE primary school in Blean? Is funding for a new primary school already secured? What will happen if one of the new schools is more successful and popular than the other? How will the catchment areas be defined? Will parents prefer to buy houses in one part of the 'settlement' than another on account of the schools?

**Conclusion:** Overall, the Local Plan is commended for its protection of Old Park Wood and its attention to the merits of cycling and walking within the City of Canterbury. However, it also contains very serious weaknesses: Firstly its desire to meet its presumed housing quota risks overloading the medieval City of Canterbury and putting immense, perhaps unbearable pressure on its resources. Secondly, the rich heritage which the City boasts and its well-deserved inclusion in the list of World Heritage sites is at risk from this insistence on a massive housebuilding programme on the part of the Council, when granting of 'exception' status might reduce or eliminate this obligation.

C12 development proposal is ill-thought out and extremely damaging to the local environment and important heritage sites. It is full of inconsistencies, contradictions and deliberate vagueness and will

result in massive destruction to local green fields, woodland, plant, animal, bird and insect species leading to a huge loss in biodiversity. It will have a grave impact on an area of considerable historical and cultural importance. It will result in a huge increase in traffic, air, noise, and light pollution in a currently unspoiled natural environment and will seriously harm the health, wellbeing, and welfare of the local communities in Blean, Tyler Hill and Rough Common. **It is a dangerous and damaging proposal and should be removed from the District Plan.**