

## Alexander Gunyon

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**From:** Dr Sarah Cardwell Davies [REDACTED]  
**Sent:** 01 June 2024 17:16  
**To:** Consultations  
**Subject:** Response to Site C12 in the draft Local Plan

**Categories:** Blue category

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Response to Site C12 in the draft Local Plan

My details: Dr Sarah Cardwell Davies, [REDACTED]

I strongly oppose the proposed development. Please find below some specific reasons, ordered in sections I hope will be helpful for the reader (these sections are not in order of priority).

Thank you for your time and for considering my response.

### **Our city**

We live in a very special little city, rich in history both built and natural, surrounded by precious rural and agricultural land. Great care needs to be taken as we develop our city.

### **'Spatial strategy' and housing**

Our new Labour-led council has rightly advocated rebalancing the Local Plan for housebuilding, and stopping overdevelopment.

This proposed development is a clear case of overdevelopment: excessively large, in the wrong location and with devastating effects on both the existing residents and the natural landscape and its biodiversity (more on the latter in section below).

The spatial strategy for our city should be to bring as many existing dwellings as possible back into use as affordable homes for local residents. The new Labour-led council has started to buy back more council homes, which is a really positive move to help create more affordable housing in the city. There are other things that can be done that do not involve destroying forever our precious green land:

The council should put in place incentives/disincentives as appropriate with the goal of retrieving as many as possible buy-to-lets, student lets and HMOs from private landlords, returning these homes to the stock of local housing for local residents, and increasing options for affordable housing.

In particular, this small city has the highest proportion of students in its population in the UK; this hugely affects our housing provision. Now is the ideal moment to begin the process of rebalancing our housing stock: given the University of Kent's dire mismanagement and their consequent decision to close several long-standing departments to attempt to save money, the number of students (and academic staff) in Canterbury will be decreasing. This means that more HMOs and student lets will be potentially freed up. The councils should require UKC to house the vast majority of remaining students in its own accommodation (student halls), on campus, rather than selling off land for house building 'to provide homes for locals' whilst huge numbers of existing local homes are currently being used as buy-to-lets and HMOs for nine months each year to university students.

## **Traffic**

This site is described in the Sustainability Assessment of the SLAA as a ‘large-scale, car-dependent development’. The development would turn Rough Common into a major through-route into the city, hugely increasing traffic down Whitstable Road, all the way down to Westgate Towers. This is an already-congested road. We walk regularly down this road, in our attempts to reduce our car use and protect the environment of our city, but we often feel choked by the fumes from heavy traffic, especially when jams are caused (as they are frequently) by the very slow level crossing barriers for Canterbury West. This area is already highly polluted, which affects not just pedestrians but also all of us who live here: there are many roads and many houses surrounding this road.

The proposal foregrounds, quite rightly, that we should be encouraging people who live on the edges of the city, as we do, to walk or cycle. But this development would undermine its own hopes in this regard. If the development went ahead, the volume of traffic and pollution levels (already bad) would be increased hugely, which would deter us from walking (or cycling).

Apparently, we would be expected then to embrace the proposed local bus services. Frankly, we wouldn’t use them. If we are deterred from walking/cycling, we will end up back in a vehicle, and a car is more convenient, simpler, quicker and cheaper (sunk costs) than catching a bus. We realise this frank response is not the response that the developer wishes to hear, but it is unrealistic and naïve to think that there will be a sudden, dramatic and permanent alteration such that thousands of local residents will decide to switch to travelling by bus, away from their cars. If you increase traffic and pollution, making walking and cycling less appealing, the simple fact is that most people will use the cars they already own, making the problem worse still. The area becomes somewhere to travel (drive) through, rather than moving in the direction of prioritising walking or cycling in a pleasant environment.

The University is required to update its Transport Impact Assessment and review the University Travel Plan when it proposes such huge developments as this. It has undertaken neither of these tasks with reference to site C12.

## **Landscape and environment**

The proposed development would destroy the green space (in essence, greenfield space) between the city and the villages of Rough Common, Blean and Tyler Hill. This band of green space is crucial to the city of Canterbury, and once concreted over can never be replaced.

The council’s new Local Nature Recovery Strategy laudably aims to increase biodiversity and preserve woodland and trees in and around the city. This proposed development, if it went ahead, would dwarf such positive efforts with the harm it would do. The Council has also committed to working with partners to extend and improve connectivity of the Blean Woodland Complex, but this development would make such connectivity impossible.

The Local Plan is required to conform to the 2021 Landscape Character Assessment, but the C12 proposals do not. The development site is right in the middle of the Blean Woods area, surrounded by various parts of the National Nature Reserve, and covering a section of High Landscape Value. It’s also between two SSSIs, and has been named as a ‘biodiversity hotspot’ in a city in which biodiversity is declining. This is an area of special importance for wildlife and is crucial to our city’s biodiversity. It is irreplaceable. To concrete over it now flies in the face of all the hugely increasing awareness, nationally and globally, of the importance and precious fragility of our natural environment, which we should be protecting at all costs – especially when a site is as unique and rich as this one is. It is untenable to claim that little green spaces and ‘buffers’ generously left within this vast development might serve adequately to replace such a huge and important area of biodiverse land.

