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RESPONSE TO THE DRAFT LOCAL PLAN 2040

Mr Christian James Holness

[REDACTED]

Chapter 1 Q1 & 2
Chapter 2 Policy C12

I am a resident of [REDACTED] and wish to **strongly object** to Policy C12 Land North of the University of Kent.

My reasons for doing so are as follows:

Heritage

There are a number of heritage sites and conservation areas both within and in the immediate vicinity of site C12 which will be negatively impacted by the proposed development. This includes the 13th Century Church of St Cosmus and St Damian (grade 2 listed) which is sited in a rural area with far-reaching views across open fields which will be replaced with an urban landscape. The presence of a 'community hub' will only cause further irreversible detriment to the character of the surrounding area. The proposal does not provide a credible explanation of how the negative impact could be mitigated and I do not believe it can be.

In addition, there are historic remains of a Roman villa, Bronze-age settlements and Medieval tile kilns in the area which will be similarly impacted – again there is no credible explanation as to how the negative impact could be mitigated.

Finally, there are grade 2 listed sites (Hothe Court and Blean House) which are unavoidably impacted by the plan.

It is also critical to point out that when the Land North of the University of Kent was submitted in the call for sites July 2022 the SLAA identified that it was not achievable on the basis that 'suitable access to the site has not been demonstrated to be achievable due to heritage and ecology concerns'

The proposal does not address the Heritage concerns which is one of the reasons the site was previously deemed unachievable.

Landscape and Character

Tyler Hill is a small village set in a quiet rural location surround by woods and open countryside. It has a small population of around 600 residents and a strong local identity. I moved my young family to Tyler Hill in 2018 and since then have become actively involved with the local community including supporting the Tyler Hill Memorial Hall (registered charity) as a Trustee. This has allowed me to serve and support my local community and as a result have been able to appreciate first-hand its value and unique character. The strong local sense of community is typified by the annual Tyler Hill Bonfire event which is run by volunteers.

Policy C12 proposes a ‘rural settlement’ of 2,000 houses which is likely to mean an additional 4,600 residents (assuming 2.3 residents per household) in the immediate vicinity. This is nearly 8 times the current population of Tyler Hill. Given that the population of the proposed settlement will also outnumber the population of neighbouring Blean village (which has approximately 1500 residents) the effect will be that the identity and character of both Tyler Hill and Blean will be irreversibly changed as both villages become effectively absorbed into a new urban settlement.

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

Access points

The proposed access solution to the C12 site is unworkable. It is reliant on two main access points which egress onto Whitstable Road near the Rough Common roundabout, yet the development also extends to the north of Tyler Hill road which is a narrow residential road providing a very limited but often critical connection between Tyler Hill and Blean.

Tyler Hill road is currently adequate for access between the Blean and Tyler Hill (and is essential for accessing local services and providing a route to West Whitstable, the A299, A2 and Rheims Way). Indeed, when Hackington Road is closed for maintenance which is a regular occurrence it provides the only practical means of travelling to Whitstable. Policy C12 states that the addition of traffic resulting from 2,000 new homes (in excess of 2,514 cars based on ONS 2021 census data for Canterbury) will be managed by “minimising traffic flow onto Tyler Hill Road” with no credible explanation as to how this will be achieved. It is also likely 2,514 vehicle estimate will be closer to 3,000 vehicles given the visitors, commuters delivery lorries resulting from the “community hub”.

Given that (based on ONS 2021 census data) the number of cars in Tyler Hill currently could be estimated to be only 327 vehicles it is reasonable to assume that the increase in vehicles locally (an increase of 768% based on Tyler Hill) will cause huge disruption to access between the villages and access to the A299, A2 and Canterbury affecting commutes and critically the most expedient access to Accident and Emergency services in Ashford and Margate (which use the Rheims Way and Whitstable A299 junction respectively). In addition, if traffic flow is to be minimised through the physical limitation of vehicles into Tyler Hill Road then the community impact to Tyler Hill should not be underestimated given the essential access it currently provides for residents.

Given the lack of detail provided in C12 it is impossible to object to what are currently unknown measures to “minimising traffic flow onto Tyler Hill Road” but **I strongly object** to any measures which restrict or

deter access to Tyler Hill Road for Tyler Hill residents given the impact to their daily lives, health, and wellbeing.

It is also critical to point out that when the Land North of the University of Kent was submitted in the call for sites July 2022 the SLAA identified that it was not achievable on the basis that ‘suitable access to the site has not been demonstrated to be achievable due to heritage and ecology concerns’. The alterations proposed in C12 are said to ‘resolve’ these issues but do nothing to mitigate the wider impact.

This includes the impact on the crab and winkle way (the cycle route will now be subjected to the daily transit across it of 2500+ vehicles), the wider impact on North Canterbury of 2,500+ extra vehicles (which is exacerbated by extra traffic resulting from policy W4).

In addition, one the two proposed access routes involve the demolition of an Ofsted ‘Outstanding’ rated Primary School and its relocation.

I have two children ages 5 and 7 who attend the school and I **strongly object** to this proposal given the disruption it will cause to their education and the negative impact of safety and well-being resulting from the huge increase in traffic and construction traffic and pollution.

The demolition of an outstanding school to build a road for a housing development is unjustified and I am aware that there has been no impact assessment undertaken to gauge the detrimental impact to pupils and staff.

The lack of such an assessment being made publicly available for consideration alongside the Draft Local plan is inappropriate and contrary to the plan’s stated goal of “improving the health and wellbeing of local communities”.

Transport

The Draft Local Plan states that C12 will be ‘car-dependent’ and as stated above will likely result in 3,000 additional vehicles using local roads. The local roads already witness significant congestion during peak periods and the increase in traffic will no doubt have a detrimental effect on current journey times, air pollution and road safety. It should be noted that the Road Safety Foundation in 2019 identified Whitstable Road as having one of the worst road traffic accident records in the UK.

Despite this there has been no traffic impact assessment made publicly available for consideration alongside the Draft local plan which is inappropriate and contrary to the plan’s stated goal of “improving the health and wellbeing of local communities”.

Tyler Hill road has a weight restriction and is very narrow at points making it difficult for two vehicles to pass each other safely. In addition, Tyler Hill road has private properties and a conservation area bordering Tyler Hill Road which will prevent any practical widening of the road. There is no credible explanation in C12 to evidence how it can achieve ‘minimising traffic flow’ and no reference therefore to how it could be done without negatively impacting the current access it provides between Blean and Tyler Hill. The access Tyler Hill road currently provides is essential for residents and as stated above I **strongly oppose** any measures that place local residents at a disadvantage by restricting the current level of access.

Due to the lack of a comprehensive traffic impact assessment being made publicly available it is impossible to gauge the wider impact of the additional 3,000 vehicles resulting from C12 on North Canterbury as a whole however there are already present points of traffic congestion such as the roundabout at Rough Common, and the junction between London Road and Whitstable Road and adjacently Forty Acres road which could not accept any further increase in traffic without severely impacting journey times, road traffic

safety and air pollution. There is **no provision in C12** to alleviate the impact of the sites traffic on these areas.

Finally I want to point out the ‘Bus-first strategy’ whilst positive in theory is not a credible solution to providing an effective mitigation for the increased traffic resulting from policy C12. CCC stated at the Public consultation on 21/05/24 that their bus usage modelling was based on other UK cities and not specifically modelled on Canterbury and there was no local evidence available to suggest that it will be an effective measure to mitigate additional traffic resulting from site C12. Locally buses are unreliable and CCC does not control how the services are provided as this is operated by a Private company. On this basis the bus-first policy is unproven and unreliable as a solution to reducing the huge increase in traffic resulting from Policy C12.

It should also be noted that the references in policy C12 to ‘providing improved walking and cycling connections to the city centre’ will be of limited benefit to residents of C12 who are not physically able to use the route due to the land topography or are elderly.

Wildlife, Biodiversity

There are several protected species in the area within and surrounding the C12 site including Skylarks, Nightingales and Great Crested Newts. The area itself including the Sarre Penn valley is rich in wildlife which has been evidenced in surveys conducted by the University of Kent’s Conservation society which noted over 77 distinct species within what forms the C12 site in May 2024.

Given the size of the impacted area is it highly doubtful that the proposed development could compensate for the loss of biodiversity given the resulting destruction of the habitat on which the protected species rely.

It is also critical to point out that when the Land North of the University of Kent was submitted in the call for sites July 2022 the SLAA identified that it was not achievable on the basis that ‘suitable access to the site has not been demonstrated to be achievable due to heritage and ecology concerns’

The proposal does not address the ecology concerns which is one of the reasons the site was previously deemed unachievable.

Farming

Policy C12 will result in the permanent loss of large areas of grade 2 and grade 3 agricultural land which is presently used for food production. This runs counter to CCC’s policy DS12 section 3 which seeks to “protect the most versatile agricultural land for the longer term”. Policy C12 should therefore be removed from the draft plan if CCC wish to comply with their own policy goal.

In conclusion I believe policy C12 is deeply flawed, and a revised draft local plan should be put forward to address them which should **abandon policy C12**.

Waste Water Plant

The Presence of a Wastewater plant in close proximity to existing residents homes in Tyler Hill will blight the values of those homes and negatively impact local wildlife. Any odours from the plant will also affect the health and wellbeing of residents.

There is no provision in C12 to consider the impact of the facility on residents nor how CCC will plan and make provision for resulting Blight claims from residents due to the impact on their property values and ability re-sell their homes for their true market value.

In summary I strongly object to policy C12 and believe it should be removed from the Draft Local Plan.

Sincerely

Christian Holness