

**RESPONSE TO THE DRAFT LOCAL PLAN 2040
HACKINGTON PARISH COUNCIL
3rd JUNE 2024**

**Chapter 1 Q1 & 2
Chapter 2 Policy C12**

Hackington Parish Council wishes to acknowledge the efforts the City Council has put into developing the draft Local Plan by having a longer-term vision for the district, which is grounded in early planning steps to take it forward.

Hackington Parish Council is a statutory consultee in the draft Local Plan consultation process. While we appreciate the need for thoughtful urban development and strategic planning, we believe that several aspects of the current proposal are deeply flawed and fail to adequately consider the long-term well-being and sustainability of our community. After extensive discussions, drop-in sessions for the residents, and consultations with the community we would like to **express our strong objections** to the **Policy C12 Land north of the University of Kent**.

Tyler Hill is a rural village on the northern outskirts of Canterbury whose population of 590 (Census 2021) is included in the civil parish of Hackington. Although close to Canterbury, the village of Tyler Hill has a clear and separate identity from the city and its neighbours. This is partly due to its geography - above the Sarre Penn Valley - and also its location at the junction of roads to Canterbury, the neighbouring village of Blean and the coast at Whitstable.



Tyler Hill village

Following the publication of the draft Local Plan we saw a record attendance at the Parish Council meeting in March 2024. While usual attendance of between 10 and 15 residents at a parish council meeting is the norm, the March meeting was attended by 72 people, including a journalist, all Ward Councillors and a KCC councillor. The mood of the room was unanimously one of shock, disappointment and indeed anger that **Policy C12 Land north of the University of Kent** had been included. When asked, not a single person spoke favourably about the plan. Many residents had assumed that as an affected Parish Council we were involved in the formulation of the consultation and looked to us for information. Given that we were not involved until the publication of the draft Local Plan and the start of the consultation period in line with Canterbury City Council guidance we have advised residents to feed back responses into this process.

Throughout the consultation process the Parish Councils of Hackington, Blean, and Harbledown & Rough Common led four drop-in sessions to support our residents in engaging with the process.

The strength of feeling towards this proposed development has been channelled by local residents into setting up a community campaign group Save The Blean (www.savetheblean.org) with hundreds of signs opposing the development clearly visible on the roads and properties in Tyler Hill, Blean, Rough Common, Harbledown and North Canterbury (see photo).



Save The Blean campaign posters across Tyler Hill, Blean and Rough Common

Throughout this submission, we will highlight specific concerns regarding the proposed development aspects. It is our hope that by raising these objections, we can engage in a constructive dialogue and work towards a revised plan that truly reflects the needs and aspirations of our diverse community and which will **abandon Policy C12**.

In the following sections, we will outline our objections in detail, providing evidence and rationale for each concern raised. Our response is framed around the *Sustainability Appraisal of the Strategic Land Availability Assessment* (December 2023) and the WSP commissioned *Sustainability Appraisal Report* prepared for Canterbury City Council. It also makes references to Canterbury City Council’s own policies as well as University of Kent’s plans.

We appreciate the opportunity to participate in this important process and look forward to a constructive dialogue on shaping the future of our community.

LANDSCAPE AND CHARACTER

Tyler Hill is a rural village situated in the heart of woodland, through which there are numerous public footpaths, with splendid views over open fields, or across the Sarre Penn Valley towards Canterbury. Despite its proximity to the city, Tyler Hill has a distinct local character and people choose to live here because of its separate identity. It is a tranquil rural place surrounded by woodlands.



Tyler Hill Meadow close to the proposed development

According to the 2021 Census the population of Tyler Hill was 590 and Blean 1500. The proposed ‘rural settlement’ envisages 2,000 houses which means at least 4,600 new residents (formula used by CCC is x2.3), far outnumbering the population of the neighbouring two villages, subsuming them into an urban sprawl and creating a small town.

A residents’ survey conducted by Hackington Parish Council in 2022 revealed that the most

important aspects of living in our village were a) the “rural aspect” of the village, b) being part of the community, and c) protection of our local landscape from developments that would change the character of the village (HPC, 2022). The impact of Policy C12 on the character of Tyler Hill will be irreversible and completely change the rural fabric of our community.

According to *Canterbury Landscape Character Assessment and Biodiversity Appraisal* prepared by LUC in 2020 the area ought to ‘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’. Furthermore, it should ‘maintain the essentially linear pattern of Blean and Tyler Hill villages avoiding further infilling or extensions that would create a greater urban extent.’ The draft Local Plan 2040 itself ‘recognises the intrinsic value of the countryside within the district and the contribution it makes to its rural character’ (point 1.14, p.7). The proposed development does not do that. In fact, it will significantly alter the character of the area leading to an urban sprawl, thus **Policy C12 should be removed from the Local Plan.**



Tyler Hill village woodlands

The impact of Policy C12 on the character of Tyler Hill village will be irreversible and completely change the rural fabric of our community.

ACCESS POINTS

The land north of the University of Kent was submitted to the previous Call for Sites in 2022. The *Strategic Land Availability Assessment 2022* identified that it was not viable due to the fact that a ‘suitable access to the site has not been demonstrated to be achievable due to heritage and ecology concerns’. However, two years later it seems that one of these concerns has been ‘resolved’ in two ways: a) by demolishing an outstanding primary Blean school and relocating it to another site; b) by using a bridle way opposite Kent College which is part of the national cycle network. Other negative impacts mentioned in the assessment have not changed and valid concerns remain.

We have made some enquiries with the Ministry of Education which uncovered that demolishing an outstanding school to make way for an access road to a building site is unprecedented; research has not found any previous instances of such ‘solution’ having been used. In addition, there has been no impact assessment undertaken on the wellbeing of staff and students as well as students’ education once the school has been relocated and is in the middle of a building site. Noise, dust, pollution, HGV traffic will adversely impact upon children’s education and staff and children’s wellbeing, yet this does not seem to have been considered.

Although primary school provision has been addressed by proposing to build **two** schools, it is not clear how the secondary school provision will be catered for. Two secondary coastal school are mentioned, but no location or year of when the provision will start are available.

Demolishing an outstanding primary school to make way for an access road to the building site is unprecedented. There has been no impact assessment upon children's education and children's and staff's wellbeing once the school has been moved and is in the middle of a building site. This is of huge concern to parents of children at the Blean primary school.

DESIGN AND LAYOUT

Policy C12 states that the 'rural settlement' will be 'developed with garden city principles' in mind. A comprehensive study into the garden city concept entitled *Visions & Reality* published in 2020 by the Foundation for Integrated Transport revealed that 'there is enormous gap between the garden community visions presented by government, consultants and local councils, and the developments likely to be built in reality' (p. 3) (<https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf>). The problem is that developments are built in the wrong location and around the wrong kind of transport. The study focused on twenty current programmes (out of 50) of garden cities as well as more than a dozen other garden villages. The research revealed that garden city communities:

- will be car-dependent
- will lead to more traffic on roads
- are unlikely to be self-sufficient
- would require massive investment in road capacity
- will lack funding for public transport
- would be underfunded for cycling

These findings certainly appear to be relevant to C12, although as will be mentioned further, no traffic impact assessment has been made publicly available which is a serious flaw of the consultation process.

Research found that sites developed 'with garden city principles in mind' are unsustainable. Given the lack of publicly available traffic impact assessment, the notion that this 'rural settlement' will be developed with garden city principles in mind, is not credible.

TRANSPORT

Policy C12 states that 'the rural settlement' will be 'car-dependent'. A conservative estimate of one house having one car leads to 2,000 more cars on our roads which does not even include visitors, delivery vans, etc. However, many families will have two cars, so realistically we ought to consider an increase of at least 3,000 cars on the nearby roads. Yet, there has been no publicly available traffic impact assessment during this consultation period. The impact on traffic volumes entering Hackington Road from Tyler Hill Road will inevitably be severe. These volumes are already high, with an average of over 26,000 cars passing in each direction per week, as the 2022 ATC survey carried out by Kent Highways demonstrated.

Tyler Hill Road

The Local Plan states that the aim is to 'minimise traffic flow onto Tyler Hill Road in both directions'. We obtained the following information under FOI request: 'It is understood that, in principle, the provision of two accesses would provide sufficient access to serve the site. Also, linking these two accesses would help to mitigate the impacts of additional traffic flow onto Tyler Hill.' It is very unclear what 'mitigating' or 'minimising traffic flow' actually entails or what additional traffic flow is expected given that there has been no publicly available traffic impact assessment.

The houses will be built on each side of Tyler Hill Road, a small winding rural road with two very sharp and dangerous bends. An increase of 3,000 cars + delivery vans, etc. will have a significant impact upon the road which is not sustainable. In addition, Tyler Hill Road has a weight limit restriction and in places it is narrow such that it is not possible for cars travelling in opposite directions to pass at anything near a normal speed. Tyler Hill Road is not suitable to cope with huge increases in traffic.

Rough Common Road

It is envisaged that the Rough Common Road will be 'upgraded' to allow for construction traffic to access the building site as there are currently weight restrictions. While it may be relatively easy to remove the parking bays (which were fairly recently installed to alleviate parking situation on the road), there are pinch points, where houses are close to the road, therefore it is not clear how this will be resolved. Any upgrade to Rough Common Road will result in it becoming a trunk road which will be used by construction vehicles. Both the A290 and Rough Common Road would see a significant increase in traffic levels as well as the city centre, changing the character of Rough Common village as well as having an impact on Tyler Hill and Blean in terms of volume of traffic.

Blean Common/Whitstable Road/North Canterbury

Adding at least 3,000 cars onto already congested roads of Blean Common, Whitstable Road, and North Canterbury such as St Stephen's and St Thomas's will lead to more congestion, more roads being closed as the pot hole situation keeps getting worse. In 2019 Whitstable Road was identified by the Road Safety Foundation as having one of the worst road traffic accident records in the UK. In particular the existing junction with Tyler Hill Road and Whitstable Road is known as a traffic accident black spot. In view of this, it is very concerning that a traffic impact assessment has not been made publicly available during the consultation process.

Bus-first Strategy

While in theory a bus-first strategy is a commendable goal, it needs to be emphasised that the Council is not the service supplier. This is a valid concern because the Local Plan seems light in detail about how these aspects will be turned from vision to delivery, given that the bus companies are commercial enterprises. Stagecoach has a monopoly on providing bus routes in Canterbury. Routes that are not commercially viable are cut. In Rough Common, there is no bus route at all; in Tyler Hill buses are frequently late, sometimes early and at times don't turn up at all. They are not a reliable mode of transport, so until such time as this situation is resolved, a bus-first strategy can only be an aspiration rather than a realistic proposition.

For this reason, Hackington Parish Council is deeply concerned that the City Council has underestimated the challenge involved in affecting the introduction of a more comprehensive and reliable bus service, let alone influencing the transition from cars to buses. Beyond the initial funding it is unclear how the bus companies will be willing or able to make the step changes required for the transport strategy to become reality. The views of our residents are that car journeys they make currently will continue and that they equally expect the development site to be car-dependent. **It is, therefore, our belief that the draft transport strategy cannot be delivered in practice as a result.**

Walking/Cycling Routes

We note that Canterbury City Council are promoting a hierarchy of transport modes within their draft *Canterbury District Transport Strategy* and underlying this is a vision of more sustainable transport.

Given the position of the site to the north of the University of Kent campus we do not believe that walking is a viable option for many of the journeys needing to be undertaken by potential future residents of this settlement. We also recognise that walking which takes place at the moment by residents in the area could reduce via the proposals.

Due to the topography of the land and the hill between the site and the city centre the use of bicycles is restricted to the minority of the population who are physically able to undertake the routes.

The Crab and Winkle way is an attractive traffic free route through countryside. The positioning of any road near or alongside the cycle way will deter cyclists from using it for leisure purposes especially at the primary access point.

Other Transport Considerations

The City Council's *Transport Paper* notes that traffic modelling has been undertaken for the proposed housing allocations (Option 5V2). It states that there is 'an issue to the north of the city with considerable congestion around junctions at Hackington Road north of the University of Kent and significant increases in traffic flow on Whitstable Road and Tyler Hill Road.' (p.4) This was one of the reasons why Land north of the University of Kent was considered unsuitable in the previous *Land Assessment* allocation exercise. In the absence of a comprehensive traffic impact assessment being made available publicly, we fail to see how this proposed development is credible as this issue has not been addressed.

A short paper by the Department for Transport's Science Advisory Council (SAC) on 'Land use and transport planning' acknowledges that 'Many larger housing developments can...be considered to be 'in the wrong place' from a transport perspective. They often are mainly accessible by car and provide limited opportunities for using other modes of transport that may be lower in greenhouse gas emissions or support public health through active travel.'

C12 is an excellent example of a larger housing development being car-dependant and 'in the wrong place.'

We do not believe that the proposal will deliver a sustainable transport model and strongly disagree with the positive rating concluded by WSP. Rather than support a reduction in the need to travel, the site will in fact increase the need to travel by private vehicles significantly. For these reasons, we seek to remove Policy C12 from the Draft Local Plan.

No traffic impact assessment has been made publicly available during the consultation period, which is a serious flaw of the consultation process. Beyond the initial funding it is unclear how the bus companies will be willing or able to make the step changes required for the transport strategy to become reality.

BIODIVERSITY

In 2023 the CCC voted to declare Biodiversity Emergency. A *Canterbury District Biodiversity Plan and Nature Recovery Strategy* will be launched in early summer 2024. We note that the Local Plan proposes 'to provide 20% biodiversity net gain, in line with Policy DS21' which is commendable. However, just as with the Bus-First strategy it is an aspiration, rather than a realistic proposition. Concreting over large areas of agricultural land which has a thriving wildlife is the opposite of increasing biodiversity.

Protected Bird Species

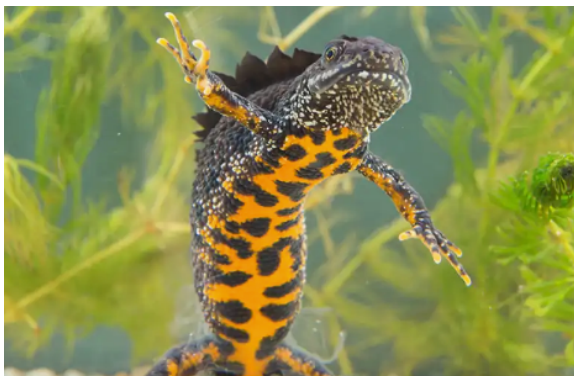
The site for development is between Blean and Tyler Hill villages in the Sarre Penn Valley which is surrounded by ancient woodland, hedgerows and arable fields. The open fields between Tyler Hill and the church at St Cosmos and St Damien at Blean provide a habitat for a number of protected species of birds, especially skylarks and nightingales.



Skylark in flight above Blean
(Credit: David Smith)

In May 2024 a group of five University of Kent researchers from the Conservation Society conducted a short 2-hour survey which recorded a total of 77 distinct species within part of the proposed development area, of which 97% were invertebrates or plants.

Great Crested Newts



Great crested newts on the University of Kent campus
(Credit: University of Kent)

The development is also likely to disrupt the longest running great crested newts monitoring programme in Europe. Located in the Elliott Pond the project has been running for the past 29 years.

Newts are very sensitive to outside disturbances. A building site within a close vicinity will adversely affect their wellbeing. The project may need to be moved or abandoned altogether.

Wilder Blean Project

The Blean Complex is held out as a showcase for South East England for innovative rewilding and the restoration of ecological functioning woodland. The *Wilder Blean Project* which introduced European bison into West Blean and Thornden woods is known world-wide. How ironic then that these proposals go in exactly the opposite direction.



Bison introduced into Blean woods under the Wilder Blean project
(Credit: Kent Wildlife Trust)

Blean Woodland Complex

Another important consideration for biodiversity is extending the connectivity of The Blean Woodland Complex. *The Landscape Character and Biodiversity Appraisal 2020* lists

The Blean as one of the five Biodiversity Opportunity Areas (BOAs). It states that ‘substantial gains for biodiversity can be made in these areas where opportunities arise for habitat creation or better management’. The site C12 site is right in the middle of this Biodiversity Opportunity Area which means that the connectivity of The Blean Woodland Complex will be substantially diminished. The Local Plan urges to ‘ensure that development does not adversely affect the landscape, ecology or setting of the Blean Woodland Complex, in line with Policy DS23’. In addition, it states that ‘no residential development shall take place within 400m of the Blean Woods SAC’. We fail to see how these plans are compatible.

The University of Kent’s own Masterplan 2019 which is intended to guide the future development sees its mission to ‘cherish and cultivate biodiversity’ and for ‘the environment that contributes positively to the lives of neighbours, the local community...’. Additionally, it states that the overall purpose of the Masterplan is to ‘ensure the future development respects, and where possible enhances, the setting of the site in the wider countryside...’ How ironic that Policy C12 goes against such lofty aspirations.

As the examples in this section clearly show the proposed development will destroy the local habitat however much the proposal plans to compensate for the loss of biodiversity in other ways.

The building of the ‘rural settlement’ will lead to the loss of habitat as well as contribute to the local decline of the protected species. The proposed development will negatively affect the connectivity of The Blean Woodland Complex.

AIR QUALITY

The proposed development will sit within two Conservation Areas: Blean and Hothe Court in Tyler Hill. *Canterbury's Local Plan (2017)* identified key issues for air quality on the Special Area of Conservation which includes the proximity of roads to sensitive habitats and the presence of physical barriers between the road and the habitat that filter air pollution. The *Habitat Regulations Assessment of Regulation 18 Draft Local Plan 2024* states that 'the air quality assessment data associated with the University of Kent allocation provides evidence that the air quality changes due to traffic growth linked to the CCC Local Plan provisions are likely to be negligible.' (9.3.14) However, the Local Plan states that it is important that there are no further decreases in air quality to the detriment of sensitive parts of the site. Given that neither the traffic impact assessment, nor the air quality assessment by the University of Kent are publicly available, this claim is not credible.

The proposed development may lead to a decrease of air quality by the sheer scale of housing numbers.

FLOOD RISK

The Met office states that by 2070 the temperature will increase by 1-4.5 degrees resulting in up to 30% more rainfall, with wetter winters and hotter summers. The construction of the proposed 2,000 homes will massively reduce permeability of the area whilst additionally the high levels of the water table will lead to increased flooding at the site along with run off via Sarre Penn and more flooding further down the valley.

Both Blean and Tyler Hill have a high-water table level which historically is recognised as leading to drainage problems. *The Strategic Flood Risk Assessment 2024* notes that 'during periods of prolonged winter rainfall the soil becomes saturated resulting in water lying on the surface for long periods of time.' (p. 50) An example of this is a flooded garden at 43 Blean Common. The resident dug foundations for an extension last year, but due to a very rainy winter and a high water table, the water has nowhere to go (see photo).



Flooded garden at 43 Blean Common

When combined with the underlying geology of the area it means that surface water collects in numerous places on the C12 site during half of the year where the land is flat. Where the land is on a slope, which is the case for those sections of land immediately to the north and south of the Sarre Penn in the valley,



Flooded fields on the University of Kent land

water can be seen flooding over and through the top of the exposed agricultural top soil (see photo).

Although Sustainable Drainage Systems are proposed, they would need to be in place across nearly all the area to be built on and due to the size of this area it is not feasible. Typically, they would be within the more green spaces interspersed amongst a development. However, these green spaces are required to the east and west of the site and they attempt, but fail greatly, to provide clear separation from the existing villages. They would not be in the middle of the site where a community hub is being proposed. As a result, it is doubtful that the extensive sustainable drainage systems needed would be able to adequately lower flow rates into the Sarre Penn. *The Strategic Flood Risk Assessment 2024* notes that where a property is located in close proximity to the Sarre Penn, there may be a rise in flooding. A potential development only increases this risk and exacerbates the problem.

In addition, there seems to be an apparent lack of integrated planning between SE Water and CCC. If fresh water supply is secure with so many proposed new houses, why is no reassurance provided and why is the housing plan to a different timetable to that of the new Broad Oak reservoir? Given that we do not have the answers to these questions, we are doubtful that the plan is credible.

The proposed development will exacerbate the flood risk and drainage problems already present.

HERITAGE

There are significant heritage sites and conservation areas surrounding and within C12 which are protected by national planning laws. The Church of St Cosmus and St Damian in the Blean is a grade II Listed Building which dates back to the 13th century. It is situated in a tranquil rural area and is surrounded by fields where the protected birds such as skylarks and nightingales sing. The proposed 'community hub' would negatively impact upon this building and irrevocably change its character. It will be subsumed in an urban sprawl development.

Other protected sites are grade II listed Blean House and Hothe Court in Tyler Hill which will be impacted by access routes. C12 will destroy the positive characteristics identified and acknowledged by the the awarding of a Conservation Area.

C12 would also impinge upon the site of a Roman Villa immediately south west of St Cosmus and St Damian's Church which is a scheduled monument, the site of Medieval Tile Kilns to the east of the site (a scheduled monument), and Bronze Age Settlement in the fields east of St Cosmus and St Damian's Church.

An archaeological excavation carried out by staff and students from the University of Kent in 2020 uncovered 'the rounded structure which has all the makings of a typical Bronze age ring ditch, defining the edge of a large burial mound, some 20m across.

[\(https://ukcbleandig.wordpress.com/about/\)](https://ukcbleandig.wordpress.com/about/)



Bronze age ring ditch near St Cosmus and St Damian church in Blean

We believe that the proposed development will have significant negative effects on the heritage in C12 which cannot be easily mitigated or minimised.

LAND USE

The Local Plan states that it will protect and grow the rural economy. However, this is highly doubtful given that such a substantial chunk of the proposed housing is at the expense of good quality agricultural land presently in use (housing proposals C12 and W4). The housing proposals in the plan are not related to local need but instead an arbitrary government housing target which is not based on the most current ONS data (see Note on Housing Numbers which follows). Although the plan claims to protect the rural environment, the use of brownfield land for housing development is quite limited in relation to the amount of rural land being lost. The NPPF recognises that area of poorer quality land should be preferred to those of a higher quality.

Hackington Parish Council is also concerned that if C12 and W4 are given the go ahead, development would mean the loss of large areas of good quality agricultural land presently in use for food production. The majority of the C12 is greenfield agricultural land farmed by tenant farmers. The grade of the land is a mix of grades 2 and 3. The WSP report does not attach any proportion of the site to greenfield or brownfield but the vast majority is greenfield. Canterbury City Council's *Policy DS12 Section 3* advises that the Council will seek to protect the most versatile agricultural land for the longer term and C12 appears to be in conflict with it. The Parish Council appreciates the balance that has to be struck with housing need but is of the view that this particular development is an avoidable reduction of prime agricultural land.

ECONOMY/EMPLOYMENT

The claim in the Local Plan that there is a demand in the immediate area to occupy a minimum of 4,000 sqm of office and business space on C12 is highly doubtful. The concern, until it can be proved otherwise, is that tenants would be difficult to source and the premises would be underutilised as a result of not being positioned in the right location. An existing tenant would need to relocate from either a city, town or business park location to move to a primarily residential settlement on the outskirts of Canterbury. We know that our area suffers from confirmed mobile signal blackouts and broadband connection problems which presents additional challenges to this development. This has been brought to the attention of the City Council. As a result, we believe that this proposal is not viable for the local economy.

We can confidently state that the tenant farmers currently farming the agricultural land will be negatively impacted by C12. **For these reasons we disagree with a positive classification for economy/employment and seek its removal from the draft Local Plan.**

HEALTH AND SUSTAINABLE COMMUNITIES

Residents in the parish are typically registered with one of two NHS GP surgeries: Northgate Medical Practice or University Medical Centre. Northgate Medical Practice operates a satellite site in Blean of upto 3 mornings a week predominantly for physiotherapy appointments. The introduction of some 5,000 additional people in the locale will have a detrimental effect on the provision of NHS services. On p. 53 of the draft Local Plan (1bv) there is a reference to proportionate contributions for primary healthcare but no land contribution. **This raises questions of the viability of C12.**

A NOTE ON THE HOUSING TARGETS

It is important to stress that the new plan obscures the total number of new dwellings for Canterbury by 2040. 15,168 have already been approved. With the new plan this gives a total of 24,514 new dwellings [new plan: 9,346 + 15,168 already approved] generating an increase in the total 'permanent' population (excluding students) of over 60% which is not sustainable within the numerous, demonstrable infrastructure, social, health constraints and the unique heritage of Canterbury.

The scale of growth is not compatible with the Council commitment to the Sustainable Development Goals. 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 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 4,885 households for Canterbury in ten years. Assuming a similar rate over 22 years 2018 -2040 would imply a total of 10,747 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 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.

CONCLUDING REMARKS

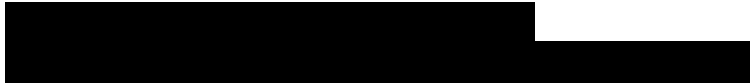
- The scale of the proposed development is wholly contradictory to the aspiration of conserving the rural character of the landscape or ensuring that it continues to play a role in the separation of Blean and Tyler Hill, with Rough Common and the University of Kent to the south. This particularly impacts the role of the Sarre Penn Valley in defining the southern edge of development in relation to the Stour Valley slopes. In reality, the proposed development would be a housing link to the outskirts of Canterbury, removing the 'green gap' between the villages and the City.
- The NPPF states that 'Local Plans should reflect needs and priorities within a local community and be based on robust and current statements of open spaces.' We have seen no evidence of this. In fact, the proposed plans for C12 goes against this policy.
- We have highlighted that there will be significant negative effects on Biodiversity, Water, Heritage, Access, Transport, Air Quality, and Land use, among others. In fact, these concerns were the reason why the previous land submission from the University of Kent was rejected in the *Sustainability Appraisal 2022*. Apart from demolishing an outstanding school to provide an access road to the development which is controversial in itself, other concerns are still valid.
- Avison Young acting on behalf of the University of Kent stated in their consultation submission that 'there is an unignorable economic need for the Sites to be delivered, to ensure future success of the University of Kent (and to ensure that its significant contribution to Canterbury's economy is sustained)'. The University of Kent's financial problems cannot be a justifiable reason to proceed with these plans which will severely impact upon our communities. It would be disingenuous to be led by their concerns at the expense of the well-being of the local community.
- The Parish Council is concerned that some members of our community were disadvantaged in the consultation process due to not being digitally engaged. Judging by the response from the drop-in sessions as well as our own research in the community, we estimate that between 10 and 15% of our (mostly elderly) population are not digitally engaged, i.e. they do not use the internet. Although it is acknowledged that other forms of response submission were made available by the Council (HPC asked for and received 40 paper copies of the questionnaires which were distributed during the drop-in sessions), the extensive evidence library which contains many key policy and reference documents on which these plans are based were unavailable. This constitutes a failure in the consultation process which disenfranchises part of the population in this consultation.
- The University's own *Strategic Plan 2025* states that the University 'respects the community' and 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' (p.5). University's Masterplan 2019, a very ambitious and forward-looking vision of the future, contradicts the plans for a large scale development in C12. Hackington Parish Council residents are rightly dismayed and angered by these proposals. They feel betrayed by the University of Kent and what they see as financially motivated proposals which lack comprehensive consideration of the local environment, place stress on the already weak infrastructure, and which will destroy the fabric of our community.

Upon reviewing the draft Local Plan, it has become evident that the key provisions will jeopardize Canterbury City Council's own policies as well as the University of Kent's strategies, vision and commitments. We appeal to the planning authority to carefully reconsider these aspects and incorporate feedback from concerned residents to ensure a plan that serves the best interests of both current and future generations.

We strongly urge Canterbury City Council to rethink this land allocation and withdraw C12 from the Local Plan.

On behalf of Hackington Parish Council

A large black rectangular redaction box covering the signature area of the document.