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1 June 2024

Dear Sir/Madam,

Draft Canterbury District Local Plan 2040 - Chapter 1 and 2 (Canterbury), Policy C12: Land North of the University of Canterbury Development

I am writing in response to the consultation regarding the above sections of the Local Plan 2040. While I will provide detailed feedback below, I have one overriding point I would like to make.

To a layperson, this proposal seems illogical and forced. Unlike other developments in the Canterbury area, which, despite some opposition, make intuitive sense due to their proximity to transport hubs and relative ease of providing the necessary infrastructure, Policy C12 fails on almost every metric. This is why the proposal by the University and C12 of the Local Plan 2024 has mobilised so many residents.

Housing Need

I acknowledge the need for continued housing development in the UK, but I am sceptical about the current projected build rate. The plan for C12 involves developing a mix of greenfield and 'best and most versatile' farmland in an area containing conservation land, ancient woodland, significant heritage and home to the recent Wilder Blean project. C12 seems to completely contradict the statements in Section 1 (Spatial Strategy for the District) of the Local Plan 2040, as well as not being congruent with the principles set out in the Canterbury Landscape Character Assessment and Biodiversity Appraisal 2020¹.

¹ <https://www.canterbury.gov.uk/sites/default/files/2024-04/Landscape%20Character%20and%20Biodiversity%20Appraisal%202020.pdf>

We should exhaust, not just prioritise², all brownfield land development opportunities before considering greenfield sites. Brownfield provides more potential for higher density more affordable housing than the lower density (35dph) proposal in C12.

I have not seen any evidence that any serious consideration has been given to exhausting brownfield opportunity. There are over one million houses in England (with at least 3,700 in Canterbury) that have planning permission but have not been built. Unlocking this potential to meet housing need would go a long way in meeting housing targets.

Tourism

Canterbury is largely a University and tourist town. This area north of Canterbury attracts many tourists each year. It has one of the best cycle paths connecting Canterbury to Whitstable. There are many other public paths, in regular use, across the land that this proposal would concrete over.

It is attractive to tourists because it is rural, connected to diverse nature, whilst being so close to the bustling Canterbury town centre. The council may know how many tourists visit Canterbury each year, but I suspect you won't know just how many come and visit this rural gem so conveniently close to the town and hotels. Tourists are unlikely to visit a residential settlement. This has a potential knock on impact to local business.

University

It is widely known that the University of Kent is currently facing some financial difficulties (documented in their annual report³). I am proud to live in a University town. It does a great job of providing excellent higher education to a diverse range of domestic and foreign students, provides rewarding skilled jobs and contributing to the local economy.

While we support the university, we must ensure that development plans align with both ecological and community needs, neither of which should be sacrificed to pay university debts. There are other ways to ensure the ongoing financial success of the University (e.g. sustainable farming, bio diversity net gain investment, further rewilding and extension of the Wilder Blean initiative).

I sincerely hope that the decision on this whole development doesn't boil down to simple short-term financial need!

Ecological Impact

The development risks damaging the Blean Woods Special Area of Conservation and ancient woodlands, despite proposed mitigation measures and apparent inadequate 'green corridors'. I have concerns including loss of biodiversity and disruption to wildlife habitats that I doubt can be made up for by a 20% biodiversity net gain elsewhere, as the ecology here is so broad.

² Chapter 1, section 1.12 of The Local Plan 2040

³ <https://media.www.kent.ac.uk/se/42084/FinancialStatements-Finalv22.pdf>

The area is home to protected bird species and the longest-running great crested newts monitoring program in Europe. The development threatens local biodiversity and the connectivity of The Blean Woodland Complex, crucial for ecological functioning.

Sustainable Drainage

The reliance on Sustainable Urban Drainage Systems (SUDS) and a linear park may be insufficient to handle storm water management, potentially leading to flooding and water quality issues. SUDS does not have a perfect track record. Previous assessments⁴ of this land by the council (Canterbury District Local Plan 2040 Sustainability Appraisal Report - Draft Canterbury District Local Plan 2040 (Regulation 18)) did not recognise this area for flood risk due to its elevation. But it has a history of flooding and significant drainage issues being composed of London clay. The farm fields proposed for development regularly hold water for extended periods, and residential property has known to flood. I think the aforementioned flood risk assessment is fatally flawed.

Transport Infrastructure

The proposed improvements are inadequate to handle the increased traffic from 2,000 new dwellings. New slip roads and enhancements to Rough Common Road will not sufficiently alleviate congestion, leading to increased traffic in surrounding areas, especially on Whitstable Road and Tyler Hill Road, the former having a high accident rate. By agreeing to C12, the council, to my mind, will have to accept an elevated road safety risk. Tyler Hill Road is a single-track road in several places, and developments north of this road are likely to increase traffic flow without clear mitigation plans, which I have not seen any real consideration of. St Dunstan's is already a high-pollution area, and increased commuter traffic to the West Rail Station will exacerbate this issue.

These are huge concerns and I cannot see how they can be mitigated without significant cost and potentially compulsory purchase. If traffic congestion, safety and pollution could be cheaply mitigated it should be done regardless of this development as these are existing concerns for the Council and residents.

Public Transport

The development's reliance on a new bus route (bus first strategy) and transport hub will not sufficiently reduce car dependency. There is a lack of detailed planning on how these will integrate with existing public transport networks to ensure reliable and frequent service. The existing transport infrastructure, including roads like Tyler Hill Road and Rough Common Road, cannot support the expected increase in traffic. No traffic impact assessment has been made publicly available, raising concerns about the validity of the C12 plan.

Access Points

⁴ https://www.canterbury.gov.uk/sites/default/files/2024-04/Sustainability%20Appraisal%20Report%20Regulation%2018%202024.pdf?fbclid=IwZXh0bgNhZW0CMTEAA R1bMDDf1qLtlA3_FG706FxoIdjEktAIGmsLx51V-0ULQMSp51B4U_QmKmw_aem_AabT5VLCzdjGwJ18Lv3244c58ljiEip3gbQm_ynt_QnPbJ0InPZxac6pgg-ecCw7qJgsMpZXR547wnLRBari7h

Previous assessments (referred to earlier) deemed the land north of the University of Kent unviable due to access issues related to heritage and ecology. The current plan involves demolishing a primary school and using a bridleway for access (but not until a certain quota of houses have been built which puts inordinate pressure on the other access point in the interim). I am concerned about the traffic onto Tyler Hill road which the knock-on impact that has on the junctions at Whitstable and Hackington Road / Canterbury Hill. I can't see how this congestion can be mitigated without massive investment, and even then it would just push the bottle neck further into an already traffic calmed network that gets congested in busy periods.

Overburdened Services

The proposed primary schools and healthcare contributions may not adequately address the increased demand from the new population. Delays in delivering these services could overburden existing facilities in the interim. Without clear management plans, not visible in the current plan, it is difficult to be reassured by the proposal. Healthcare services are already very stretched in this area.

Heritage Sites

The proximity to heritage assets, such as the scheduled ancient monument and Grade II listed St Cosmus and Damian church (also a commonwealth war graves site), could negatively impact these historic sites despite proposed assessments and mitigations. Policy C12 threatens to urbanise the area, contrary to recommendations to maintain its rural character. It has the remains of a Roman Villa, medieval tile kilns (both scheduled monuments) and many listed buildings. It is hard to see how the character of this area will remain when part of an urban development twice the size of the walled part of Canterbury.

Phasing and Delivery

The phased approach, especially the timing of the wastewater treatment works, primary schools relocation, access points and transport improvements, may result in periods where the infrastructure does not meet the existing community's needs, causing temporary but significant disruptions. The plan's reliance on long-term management and stewardship could be problematic if not properly funded and managed, leading to potential neglect of communal spaces and infrastructure over time. And it would appear to me that the cost of mitigations to the plan would be significant for both the developer and the Council.

In Summary

This development would disrupt the fabric of three quiet, rural villages valued for their scenic woodlands and strong community spirit. Adding 2,000 houses would drastically increase the population and transform the villages into an urban area, threatening the area's character and damaging tourism, a significant income stream in Canterbury.

Access to the new development I think is hugely problematic, involving the demolition of a primary school and using a cycle path for construction traffic, raising concerns about safety and education disruption to a school currently rated as 'outstanding'. The development's

design claims to follow "garden city principles," but it would actually increase car dependency and traffic congestion, with no cogent plan for public transport.

The development poses a serious threat to local biodiversity, impacting protected species and important ecological projects. The area, known for its rich wildlife and rewilding efforts, would lose significant habitat connectivity. Overall, the proposed development would drastically alter the area's character and natural environment.

Allowing this development to proceed would be a collective failure. It would be a failure of the council to protect biodiversity. Failure to exhaust brownfield opportunities for higher density more affordable housing. It would be a failure of the University to stay true to its civic mission, sustainability strategy⁵ and to enhance biodiversity. And a failure of planning principles if they allow the 'force-fitting' of a development in an area that, despite mitigations, is not suitable to accept it.

Please don't let your community down. Eject C12 from The Local Plan 2040.

Thank you for your attention.

Yours sincerely,

[sent electronically]

Chris Amos,


⁵ <https://www.kent.ac.uk/sustainability>