

BLEAN PARISH COUNCIL



BLEAN PARISH COUNCIL RESPONSE TO DRAFT LOCAL PLAN 2040

Blean Parish Council is opposed to Policy C12 for the following reasons.

1. The proposed development will extend the urban area of the city of Canterbury into the countryside destroying a vast area of natural beauty and peace for all who live here and all who visit The Blean area to enjoy and benefit from the environment of ancient woodlands, birds, bats and other wildlife all on the doorstep of historic Canterbury. The Blean is a jewel in our crown.

The Parish Council consider that the development of this land is a convoluted ill-conceived concept. The development of this area as proposed will, given its scale, swamp the existing settlements of Blean, Rough Common and Tyler Hill, the identities of which will be destroyed and lost forever. The land has no proper access so as a result two have had to be created, both at the far southern end of this so-called linear development. However, traffic from the north and east directions i.e. from the Thanet Way / Whitstable and Herne Bay areas and beyond will use Tyler Hill Road to access this site, especially with the community hub adjoining this road. The impacts of this development on Tyler Hill Road do not appear to have been properly assessed by CCC or by Kent Highways and the Parish is of the opinion that without a properly tested transport assessment that no decision can be made on whether or not to include this land within the draft local plan. Such an assessment is fundamental.

2. Design and Layout

Under (f) given the scale of development ,its density ,especially that higher density will be encouraged within and around the community hub ,which is shown close to the Blean Church and within the Blean conservation area, the Parish is therefore of the opinion that the development will have a significant harmful impact on the setting of the existing listed buildings , the Scheduled Ancient Monument and the other conservation areas within and adjoining this site contrary to Policy DS 26 of the Local Plan. Views in and out of the Conservation areas will be significantly impacted by the scale of the development No

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evidence has been provided to show how this may be mitigated or minimised as mentioned under (f) or to assess the impact of the development on these valuable heritage assets.

If this land is allocated as shown on the concept plan, then the adjoining land becomes very vulnerable to opportunities for further residential and commercial development proposals. The land at Hothe Lodge bungalow is surrounded on 3 sides by this allocation as is the land at Mill Field between nos 33 and 45 Tyler Hill Road. In addition, there are other parcels of land on the edge of Blean and Tyler Hill which as a result of this allocation the Council would find difficult to refuse if the subject of a subsequent future planning application for residential development.

3. Landscape and green infrastructure

The Parish Council notes that CCC's 2021 Landscape Character Assessment describes the "strong rural character" of this area with its mix of woodlands, orchards and farmland, and the need to conserve this landscape. The southern part of the site is located in Canterbury's Area of High Landscape Value, and it is between two Sites of Special Scientific Interest – RSPB Blean and West Blean Reserve. The development of this land under Policy C12 completely contradicts the 2021 Land Character Assessment, to which the Local Plan is required to conform.

The proposed site allocation is within the Green Gap separating Canterbury from Blean and Rough Common and the development of this site is likely to lead to a coalescence of these settlements together with Tyler Hill to the east. Furthermore, due to the size of the proposed "freestanding" settlement involving 2000 houses plus a community hub including a local centre and businesses (minimum 4000 sq m) and the character of the existing area, together with existing views into/out of the site, the proposed development will have a significant harmful impact on the surrounding area.

In terms of mitigation and/or minimising the effects of this development referred to in this policy, the Parish would argue that the landscape effects of a new settlement of this scale within this greenfield/wooded landscape cannot be mitigated. In addition, the Parish is not aware of, and there is no evidence to suggest that a visual impact assessment for this site has been carried out to support the positive statements under this section of Policy C12.

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The Parish Council notes (i) and the potential impact of this development on the Blean Woodlands Complex but cannot understand how it can be in line with Policy DS23. The land is surrounded by the Blean Woodlands area, the SSSI and by various parts of the National Nature Reserve. It is well known that there are various rare and endangered species living in the fields, ponds, hedgerows and the Sarre Penn valley. These species are all endangered by this development. Policy SS1.10 states that CCC will continue to work with partners to extend and improve connectivity of the Blean Woodland Complex, however the Parish Council considers that this development would make connectivity impossible.

At (f) it refers to “provide green corridors to link wider countryside to the city centre including enhancements to the potential habitat connectivity offered by the disused crab and winkle railway and along the Sarre Penn valley.” However, the Parish is of the view that C12 does not satisfy policy DS19 of the Local Plan, as C12 would in effect create one continuous urban sprawl between Rough Common, Blean and Tyler Hill with no real meaningful separation of the three distinct villages. It is considered that the open space and landscape buffers shown on the Concept Plan (which are not the same as those shown by Avison Young and the University at a Teams meeting with Blean PC on their own similar concept plan) are not sufficient to mitigate the impact on the villages, landscape, the Conservation Areas or adjacent listed buildings, particularly Blean Church and Church Cottage.

The development of this land with its proposed spine road north to south and proposed bridge across the Sarre Penn Valley to serve 2,000 houses and community hub features plus a Waste Water treatment works (of an undeterminable size) will inevitably result in the significant loss of TPO trees, woodland and valuable field hedgerows which help to make up the landscape character of this area, contrary to (d) which refers to retaining substantial existing tree cover and (k) which refers to conserving and enhancing historic field patterns.

The Parish struggles to see how the construction of one of the main accesses to serve such a development with all its street furniture and signage which comes with such an important junction cannot have a significant visual impact on the Blean and Rough Common Green Gap contrary to the wording at (g). The

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functionality of the green gap to have a meaningful gap between Blean and Rough Common will inevitably be eroded away by such a development.

Under (l) and (m) it is stated that key views from the PROW network will be protected. However, the Parish does not understand how this can be justified, and no evidence has been provided to support this claim. The Parish would argue that given the scale of the development and the loss of existing greenfields to 2000 houses and commercial businesses minimum of 4000 sq m, that the views will be lost forever as a result of this proposal. The character of these routes will also change given the need to provide lighting and black top surfacing to encourage potential residents of the development to use the routes, day and night, rather than use their cars.

Under (b) no evidence has been provided to show how the development can/will provide 20% Biodiversity Net Gain (BNG) in line with policy DS17. The Parish considers that this is unlikely to be achievable for such a development here given that this is an existing greenfield/woodland /orchard area with its existing varied habitats and wildlife. It is well known that it is much easier to achieve 20% BNG for a brownfield site than for the one considered under policy C12 given its existing varied habitat and wildlife. Furthermore, no justification or evidence has been provided by the Council to show how 20% BNG can be achieved for this development.

4. Access and Transportation

Under (a) the existing public bridleway - the Crab and Winkle bridleway route will be changed forever as a result of this development - what is currently a pleasant route through the orchard/woodland, greenfield landscape will become a much more urban environment that is experienced whilst travelling through the development. The Parish notes that the Crab and Winkle way (an old salt road) has been in existence since Roman times, so it is an important feature of the landscape here. It should not be turned into a formal road. The actual route of the former railway is in the valley halfway across the field east of Blean Church towards Tyler Hill. The Parish is of the view that given its historic importance – with the Invicta engine supplied by Stephenson (its design based on the Rocket) making the first journey in May 1830, the route should be preserved in situ.

The recent Sustainable Assessment for the SLAA referred to this site as " a large-scale car dependent development " and the Parish is of the view that given

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its location that despite the access and transport strategy suggested under (4) that it will be a car dominated development with a subsequent high level of traffic generation. The site is currently not on a bus route nor within walking distance of a railway station, meaning that most significant journeys are undertaken by car.

All roads leading into and out of this area are two-way traffic and single lane routes with passing places, used by cyclists, walkers, runners, horse riders as well as cars. CCC admirably wish to encourage greener methods of movement by promoting a Bus First strategy whilst creating bus lanes and cycle lanes. Most of the roads from and to Blean, Tyler Hill and Rough Common to reach Canterbury and beyond are not wide enough to safely accommodate the formation of adequate safe bus and /or cycle lanes, whilst several roads have limited or no pavements and are not lit. Many elderly residents in Blean report that the buses are unreliable and say that the buses do not operate to the published timetables which does not encourage their patronage. Only recently the Rough Common bus service was withdrawn by Stagecoach as deemed to be unprofitable.

At (a) it states that safe and convenient pedestrian and cycle connectivity will be provided through various improvements particularly along the Crab and Winkle route and whilst the Parish support such aspirations, there is a limit to how often these modes of travel will be used compared with the car at this site. Policy C12 appears to ignore the fact that there are large hills to navigate in all directions for all concerned, together with the fact that not all people have access to a cycle or consider themselves fit enough given the distances involved to walk/cycle from this site to Canterbury or Whitstable.

It is clear from clauses (d), (e) and (f) that the intention of the Council's access/transportation strategy for Policy C12 is to direct all traffic to north Canterbury from the west and south from new A2 slips at Harbledown via Rough Common Road. However, the proposed construction of the two access points following the demolition of the Blean Primary School, the upgrading of Rough Common Road, the removal of parking bays along the same road, the creation of two on and off A2 slip roads would imply that accidentally or deliberately the Rough Common Road would become a busy bypass route. This will be devastating for the residents in Rough Common and Harbledown. Pollution levels will increase in an area where children walk to and from Blean Primary School.

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However, what is missing from the access and transport strategy is the question of what would happen to traffic from the north and east directions, that is from the Thanet Way/Whitstable and Herne Bay directions? They would use the existing road network presumably. What is promised at (e) (no guarantee it can be delivered) is to minimise traffic flow onto Tyler Hill Road in both directions. No details are provided as to how this might be achieved bearing in mind that Tyler Hill Road is the only road that goes through this site, otherwise it is landlocked.

Furthermore, no details are given in the Plan as to how many thousands of journeys will be generated by such a development and no assessment has been carried out of the impact of the development on the existing road network. Without such an assessment how can the Parish Councils comment further /consider what the implications will be for the existing community.

CCC stated at a meeting that no traffic impact survey is available and will not be before the 3 June 2024 deadline. At another meeting Avison Young advised the Parish that they have carried out a microsimulation transport survey which CCC know about, however such assessments are not in the public domain.

This lack of information is unacceptable to the Parish, and we would request that there is an opportunity when this transport information is available for the 3 parishes and their constituents to be reconsulted on this proposed allocation before any decisions are made by CCC on its suitability in this Local Plan.

Under (b) it refers to "... facilitate good access to public transport facilities for new residents, with a new bus route connecting residential areas and the community hub to Canterbury West railway station and the city centre." and at 2.16 it refers to a "high frequency bus service which can connect the site to Canterbury West station and the city centre." However, whilst this is very laudable, the Council has no control over the bus services in/around Canterbury and has no ways or means to guarantee to deliver such services. It is notable that despite what the Council says about encouraging more frequent usage of the buses and the bus services, that the existing bus services around Canterbury including those north of the University have recently been reduced in their frequency.

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5, Phasing and delivery

At (a) on site water waste treatment works is proposed as a solution to the Stodmarsh nutrient neutrality issue. This will surely bring in more traffic to the area and where will the “contents” go if not to the nearest existing treatment plant and end up back into the Stodmarsh via the River Stour and its tributaries and eventually into the sea.

If under (a) a waste water treatment works is required for this development then rather than the vague words "should be delivered at the earliest possible stage of development" there presumably is a need for such a facility. to facilitate the development Given this need, the wording should be clearer and more certain. The Parish would therefore suggest the following wording:
" Waste water treatment works must be delivered prior to the occupation of the first dwelling being occupied or the first use of any commercial premises, whichever comes first".

Despite the Council's heavy reliance on a bus first strategy to serve this and other new developments in the local plan, there is no mention of when the transport hub should be provided including a new high frequency bus service. Why not? Surely the City Council have negotiated with the various bus operators, as the council does not operate its own buses to know when they will be able to operate such a service which is essential to serve this and other developments/communities and for the bus first strategy to be effective and efficient.

Conclusion

Blean Parish Council in the above sections have identified numerous major issues with Policy C12, which given their significance the Parish believe can only be addressed by the removal of this Policy from the draft local plan.

Contact Details on behalf of Blean Parish Council
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