

Canterbury District Local Plan to 2040

Consultation Response

From Stephen Burke

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[REDACTED] I drive, walk and cycle. I enjoy the countryside, cycling, nature, photography and history. I have walked and cycled along the Crab and Winkle Way many times. I have visited the area around St Cosmos and St Damian church, and back towards Long Thin Wood, for night sky, nature and landscape photography, and for archaeology.

There are parts of the Canterbury District Local Plan I like, there are other parts that I am concerned about, my chief concern is the proposal under **Policy C12** to build a 2000 dwelling estate north of the University of Kent, my response will mainly cover this policy.

Policy C12 – Land North of the University of Kent

General Comments

I am shocked at the content of Policy C12, it appears to me to be poorly thought out and deeply worrying, a knee jerk reaction to the financial problems of the University, many of them self inflicted. The policy appears to have been quickly drafted and there are mistakes and contradictions within it. The “concept masterplan” on page 52 is poorly conceived and lacks detail. It is noteworthy that “nice things” such as green corridors are indicated by long arrows, whereas not so nice things such as roads are indicated by short arrows. There is no indication of where the roads will run, despite Avison Young clearly having a good idea. Surprisingly there is also no indication of where 2000 dwellings will be built. I am surprised that CCC should have thought that the concept masterplan was of a sufficient quality to present in the Draft Plan, surely Avison Young had a more detailed plan that could have been used?

The discussion of the Policy at the meeting in Canterbury on 21 May was superficial, dispiriting and frustrating. One counsellor in particular, while taking many of the questions, answered few of them and his tone was distinctly unhelpful.

As a cyclist and nature lover it is depressing to see the impact of the large housing estates that have been built around Canterbury. Sadly one development had a very negative impact on the badgers living there.

I am aware that during the last ten years the University engaged architects to look at how the land north of the campus might be used, and I thought I would start by looking at what they had to say. I will also refer to a University of Kent woodland survey and a landscape and biodiversity strategy.

Assessment Carried out for Sibson Building Development Circa 2014

In or about 2014, the University of Kent engaged the architects Penoyre & Prasad to work on a project to design what became known as the Sibson building. CCC has all the related planning documentation on its site. Penoyre & Prasad conducted an assessment of various sites owned by the University to identify a suitable site of I assume about 1ha for the Sibson building. The area largely covered by C12 was designated as “Agricultural Land to the North” and “Site 1”. Penoyre & Prasad assessed each site under 11 categories and applied a positive, neutral or negative response to each one. It recommended not building on Site 1, the neutral and negative reasons for this included:

Ecology & Nature: The area includes large areas of trees and hedgerows which are likely to provide important habitat for a range of protected and non-protected species although, given the overall size of the site [circa 1ha], it would be possible to deliver development without affecting these potentially sensitive areas.

Landscape & Visual Impact: This is a highly visible swath of farm land located in the open countryside and any major development would be likely to have a significant impact upon the open character of the area to the north of Canterbury.

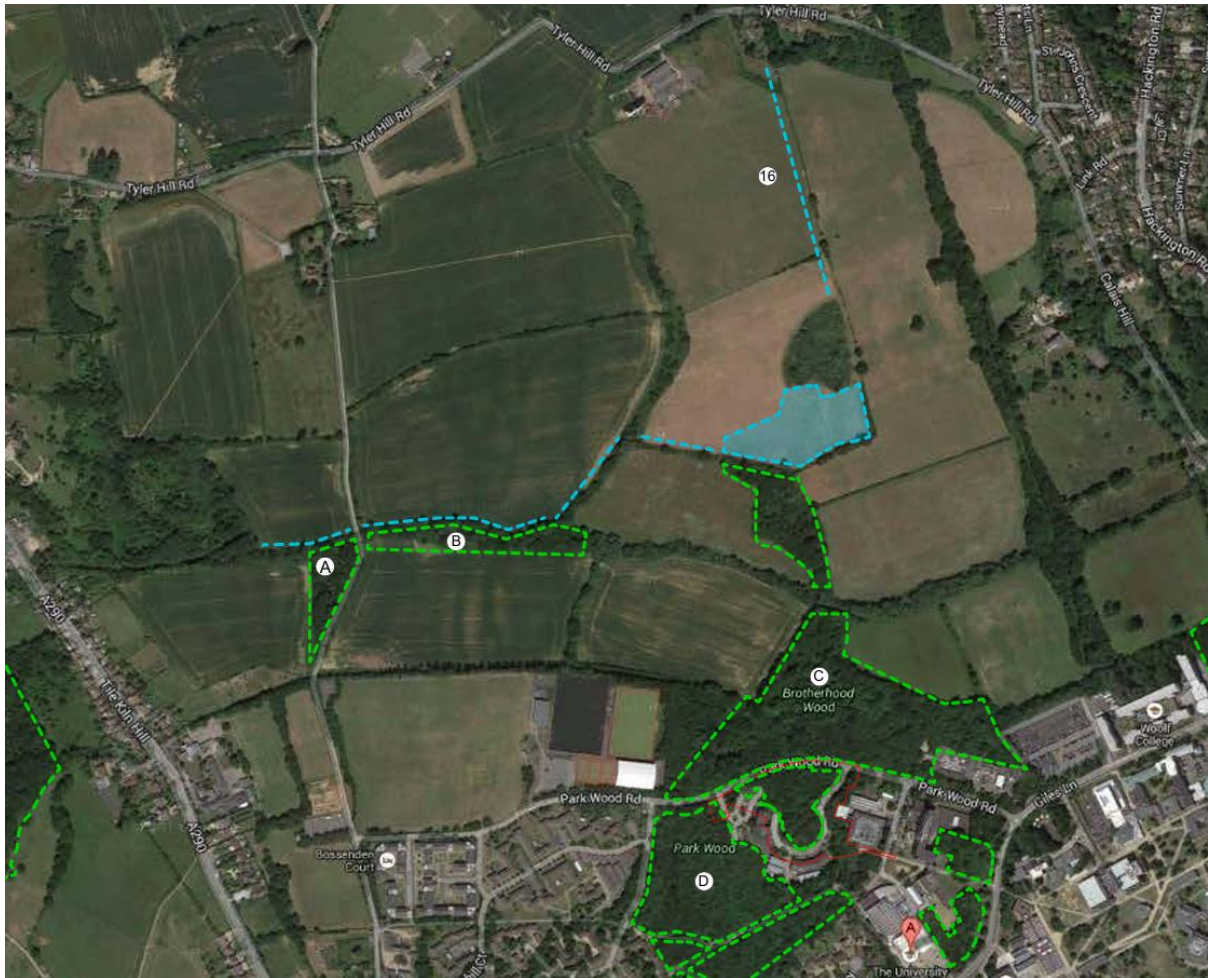
Transport & Traffic: The site is a considerable distance from the centre of the campus and the City Centre (outside of easy walking distance) which may encourage less sustainable forms of travel. It also has only minimal road access. The introduction of a new academic building in this area may also give rise to increase [sic] traffic in the villages to the north of Canterbury. Its isolated nature would make the provision of additional local parking a requirement.

See “4. Site Assessments Stage 1 Initial Viability” available at:

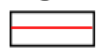




https://pa.canterbury.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZXGUEAID928&fbclid=IwZxh0bgNhZWOCMTAAAR3MWEf7TEmw2REp29Xf7XyeTVUPO1Y-gFfeKpjKGpQlryx4kCE_6Ing1qk_aem_Ae5jt23j62PjlbGxMUjPtBaGcUtQ0ppeIijZPo8INknjfczw5X5_swdrJvvv0gLYnx6-d2mhgSbLDdsXCNapFWrf

Penoyre & Prasad’s chief concerns can be summarised as: the potential for habitat loss and the impact of this on protected and non-protected species, the impact on the landscape, and the transport and accessibility issues.

As part of the planning process for the Sibson Building an *Ancient Woodland Compensation & Mitigation Report* was produced, it focussed on suitable sites where planting could take place to compensate for the loss of ancient woodland. The sites that were put forward in 2014 included West Triangle Wood and Long Thin Wood, **both were described as ancient woodland.**



Legend

- 
Red Line Boundary (area affected by proposed development)
See fig. 6 for a description of the retention, modification and removal proposed
- 
Existing ancient woodland
- 
Areas of proposed hedgerow enhancement
- 
Areas of proposed replanting
- 
Area for proposed management.

Source: https://pa.canterbury.gov.uk/online-applications/files/33D944122BA708140108ED60236C5AD2/pdf/CA_14_01032-STATEMENT_Woodland_Report-557384.pdf

So the University proposed to compensate for the loss of ancient woodland in sites precisely where the new development is proposed to go, suggesting that if it goes ahead there will need to be compensation for the compensation. It is little wonder that Kent Wildlife Trust was not satisfied with this compensation and mitigation plan see: https://pa.canterbury.gov.uk/online-applications/files/FE5AB57FC8363978121FBE9DCE6DAC49/pdf/CA_14_01032-Kent_Wildlife_Trust-300160.pdf

University of Kent Canterbury Campus Framework Masterplan April 2019

The University engaged the architects John Letherland Ltd and Birds Portchmouth Russum to conduct a very thorough review of its campus and to devise a masterplan to inform future development. The architects consulted widely including meeting with me on two occasions, I provided information on the early development of the campus and some images that were used in the final document. The Masterplan was published in 2019 and it included a forward by the Vice-Chancellor Professor Karen Cox, she endorsed the Masterplan and stated “The natural environment is also cherished, connecting us with Kent’s deserved status as ‘the Garden of England’”, the VC acknowledged the expert advice provided by Kent County Council and Canterbury City Council. The Masterplan is well worth reading in the context of Policy C18. The Masterplan discusses the C12 proposed development area in some detail for example:

The masterplan seeks to conserve the scenic quality of important views from the surrounding area and the visual setting of the City, Blean, Tyler Hill and Rough Common. (Masterplan p. 41)

The campus and nearby University-owned land will be developed in ways that support its special natural and semi-natural environment, the setting of the Canterbury’s World Heritage Site and local heritage assets. (Masterplan p. 62)

The Masterplan referred to CCC’s own policies:

Policy LB4 (Landscape Character Areas)

Proposals for development, and associated land use change or land management, must demonstrate that they are informed by, and sympathetic to, the landscape character of the locality. In considering development proposals, the Council will take every opportunity to reinforce, restore, conserve or improve, as appropriate, the landscape character of the area in which development is proposed. (p. 69)

Policy LB8 (Landscape Scale Biodiversity Networks) (Areas of Ancient Woodland)

States that new development will need to (amongst other things):

- avoid the fragmentation of existing habitats and support the creation of coherent ecological networks through both urban and rural areas, and
- retain, protect and enhance notable ecological features of conservation value such as ancient woodland, neutral grassland, hedgerows, trees, wetlands, river corridors and other water bodies, and habitats that offer breeding or feeding sites of local importance to populations of protected or targeted species. (Masterplan p. 69)

Policy LB11 (The Blean Complex)

The Council will support projects that restore, enhance and connect the valued woodland habitat complex of the Blean. The Council will give particular support to projects that benefit the landscape through sensitive and traditional woodland practices and which support the timber market and wider local economy. The City Council will refuse proposals for development that would result in the loss, deterioration or damages the character or and

integrity of the Blean Complex. Development should provide or which would will prevent important opportunities for biodiversity improvement within the identified Biodiversity Improvement Areas. (Masterplan p. 70)

The Masterplan covers the C12 area in detail for example the importance Sarre Penn Shaw (Long Thin Wood) for wildlife and the health of Sarre Penn:

Sarre Penn Shaw: An east-west aligned woodland shaw extending along the Sarre Penn stream between West Triangle Wood in the west and the former Crab & Winkle rail line in the east. This shaw is noteworthy for providing connectivity between Brotherhood Wood, West Triangle Wood, Foxborough Wood and the woodland of Blean Pastures Local Wildlife Site. The canopy is dominated by Oaks and Ash, while Hazel, Hawthorn, Blackthorn, Dogwood, Field Maple and Grey Willow are all frequent in the understorey. Bluebells and Wood Anemone dominate the ground flora in Foxborough Wood. (Masterplan p. 118)

And

The Sarre Penn Stream, a section of which flows through the University's landholdings, is a 13km tributary of the River Stour. Flowing west to east across the centre of the character area, the Sarre Penn has formed a shallow sided 'V' shaped valley. For virtually its entire journey across the University's landholding, the Sarre Penn is densely shaded by mature trees and shrubs and thus there is little in the way of riparian herbaceous vegetation. Woody debris is a key feature within the channel, generating organic matter that contributes to the overall productivity of the river system. This debris, along with overhanging canopies and submerged roots and limbs, provides refuges for fish and invertebrates and diversifies flow and the range of species that can inhabit the varied current velocities. Tree roots also stabilise the banks that may otherwise be vulnerable to collapse. For this reason, South East Water generally recommends retention and restoration of the stream's wooded character, although advises against fully enclosing vegetation.

The westernmost section of the stream forms part of the Blean Pastures Local Wildlife site. The stream and adjoining habitat are therefore likely to function as important wildlife corridors for wildlife moving between these important habitats and the campus. (Masterplan p. 122)

John Letherland Ltd and Birds Portchmouth Russum proposed some carefully thought out and sensitive development within what they termed the Sarre Penn Valley, this was to be combined with some enhancements of the woods and hedgerows, the open landscape would be left more or less as it was. This is their plan:



Figure 70: Landscape Character Area: Sarre Penn Valley proposed masterplan layout

(Masterplan p. 163)

The Masterplan can be viewed here: https://media.www.kent.ac.uk/se/23966/draft-framework-masterplan-2019.pdf?fbclid=IwZXh0bgNhZW0CMTAAR0Ldxre1fw8pWDnvcswrB6p1fjo8eD_JBk4VkWJXnGFd8f3uBo20Buc15o_aem_AW8Zr-2PtVZgh-tEdu2MIMYskBdUzQ1hVJCRA-yH8hg6sdg-bR4HS-xwtVWPeAbHh6pxBTKkNuun7lhyW2yeSvg

University of Kent Woodland Management Strategy January 2016

In 2015 the University appointed the reputable company Land Use Consultants (LUC, see <https://www.landuse.co.uk/>) to prepare a “Woodland Management strategy for the Canterbury

Campus”, the strategy was published in January 2016, see https://www.kent.ac.uk/estates/files/sustainability/EMS%20Documents/Supporting%20Documents/Woodland_Management_Plan.pdf?fbclid=IwZXh0bGhZw0CMTAAAR2v_dcpuQIMdr5v0CcmZSmTsUxqJuSnBf4-cOoFP5okm3Yv5xtxdfXehKU_aem_AfrSkPRBBja9bH5NPnbAITs8iGru3js9PcZORV4mF2cZFPmv1x5xDmqkooAurci1BW1D8mFU4emdAupPOPuA59Zi

LUC located all of the woodland on the campus and evaluated it. LUC had this to say about West Triangle Wood and Long Thin Wood in the C12 development area:

The two smaller woodland compartments to the North of the Campus (West Triangle Wood and Long Thin Wood) currently provide a high quality ecological resource. Therefore in 2014 it was recommended that the existing management approach adopted for these woodlands continue. (LUC p.3)

The two woods are shown on this map:



(LUC after p. 13)

Note that LUC identified sub-communities of *Anemone nemorosa* (wood anemones) at West Triangle Wood and Long Thin Wood. The Woodland Trust states that:

The presence of wood anemones can indicate ancient woodland as it is a slow-growing species which spreads via rhizomes – horizontal underground stems.

Wood anemone is often found in ancient woodland, a habitat which is in desperate need of protection. As well as wood anemone, thousands of species rely on these complex and irreplaceable habitats.

The bold highlighting is mine. (<https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/plants/wild-flowers/wood-anemone/>)

The categorisation of West Triangle Wood and Long Thin Wood as ancient or ancient semi natural woodland accords with DEFRA and *A Revision of the Ancient Woodland Inventory for Canterbury district, Kent Report and Inventory Maps*, August 2012, please see under 3(h) below.

University of Kent, Estates, Landscape and Biodiversity Strategy 2021 – 2025

This appears to have followed on from the thorough work carried out by LUC (see above). Once more the University stated the importance of looking after ancient woodland, and it pointed to West Triangle Wood and Long Thin Wood as being particularly important, see for example:

2.1.2. Ancient Woodlands

Much of the woodland on central Canterbury campus is designated ancient semi-natural woodland. Ancient woodland is a unique and irreplaceable habitat which covers less than 2% of the land area of the UK. It is afforded special protection in planning law and the University has a responsibility to manage and protect these woodlands accordingly.

6.2.1.1. Woodlands North of the Campus

When surveyed in 2014 West Triangle Wood and Long Thin Wood were assessed as providing a high-quality ecological resource and that no changes to the existing management were recommended. It is now recommended that these areas are reassessed to see whether this is still the case.

Source:

https://media.www.kent.ac.uk/se/23588/LandscapeandBiodiversityStrategy_FinalVersion.pdf?fbclid=IwZXh0bgNhZWQCMTEAAR0XlFuEX4jXgkqkn0j5E8XFcl5moNczRjUjLaI3lNrm0tHXngBJ2tuwY_aem_AT4p6-RRusbR5JuxcWR3fN1B1XbkgPoU4abM83EiP6POmeQO_IQJGms0JdUu1DolPlvzD1k8rU4gtklTUbP_7kD

My response to the specific points in **Policy C12** now follows, I have followed your numbering system and included some words from each point, hopefully this will make it easier to follow.

1 Development Mix

(s) – *Approximately 2,000 new dwellings...*

The scale of the proposed development is huge, just over 1 km², it will dwarf Blean, Rough Common and Tyler Hill. For comparison the whole of the city of Canterbury within the ring road and walls would fit into it:



A 1km square superimposed on the centre of Canterbury.

Looking at other places in East Kent it seems fair to assume 2.4 occupants per dwelling, so this development would have approximately 4800 people. For comparison a small town I lived in as a child had a population of about 6,000.

(b)(iii)(v) – proportionate contributions for primary healthcare and other necessary off-site community infrastructure

What does mean?

2 Design and layout

(a) – ...long-term management and stewardship

Who is responsible for the “long-term management and stewardship”? Would this be the developer(s)? I note that a developer working with Avison Young went bankrupt, resulting in there being no long-term management and stewardship, and very concerned local people and consellers.

(b) – Everyday needs...15 minute walk.. reducing car dependency

Does this suggest that all these needs will be delivered via shops, takeaways, pharmacies, healthcare centres etc within the development? If not then a 15 minute walk from around the middle of the site would take an average walker as far as the Whitstable Road where there are no shops.

Regarding car dependency, it is hard to see how this is feasible particularly given CCC's own *Sustainability Appraisal of the Strategic Land Availability Assessment* that states on page 213 (SLAA3190) this development would have "significant negative effects on transport highways (large-scale car dependent development)." CCC's own Assessment envisages a car dependent commuter town.

(c) – Higher density development...around community hub

Several points in C12 cover the "community hub" and its surrounding area, but I intend to cover them all here. It is proposed that the "community hub" will have "commercial" and "local shopping and community uses", "office and business space", a "mobility hub" and a "new 3FE Primary School (3 ha) adjacent, "higher density development will be encouraged within and around the community hub", it appears that this is also the "new mixed use local centre", though this is not clear. If the "community hub" and the "local centre" are one and the same thing then the Plan suggests that it will be in the "format of a high street or village/town square containing flexible outdoor space". However, on the "concept masterplan" this community hub/town square will contain and be surrounded by higher density development, and will have a 3 ha school alongside, but the indicative site is actually hemmed in by Tyler Hill Road to the north, and two "opportunities for green corridors" east and south, and surprisingly two "open space/biodiversity corridors" go through it, the latter are hedgerows. It appears that the only scope for the high-density development and the school is to build next to the church somehow avoiding the north/south "opportunities to improve cycling/walking access and safety".

Little of this makes any sense.

(f) – heritage assets...Conservation Areas...

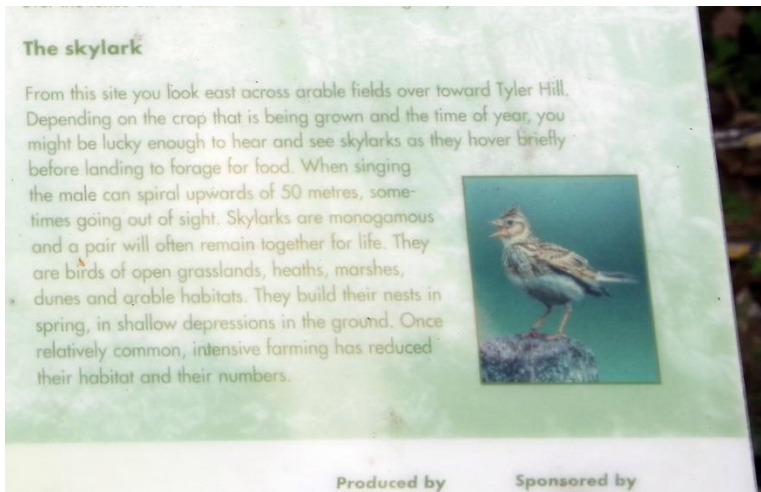
It is not clear how impacts will be mitigated given that the Conservation Areas, St Cosmos and St Damian Church and other Grade 2 Listed Buildings will be swamped by a 1km² vast housing estate.

3 Landscape and green infrastructure

(b) – Provide 20% biodiversity net gain...

I understand that some developers underestimate the existing biodiversity to make it easier to demonstrate a 20% net gain after the development has taken place, is this happens how will it be avoided here? How will removing hedgerows and trees to building a huge sprawling housing estate with road system provide a biodiversity net gain. The new road system will create dangerous barriers to wildlife.

The following image is on a notice board near to St Cosmos and St Damien Church, CCC co-sponsors the board:



If this development proceeds people won't be "lucky enough to hear and see skylarks ..." in this area, the view of "arable fields over toward Tyler Hill" will be replaced by a school and higher density development around the community hub/town square.

(c) – *Assess the site's potential to be functionally linked land for golden plover...*

Is this due to the loss of golden plover habitat due to housing and other developments either side of the A299 Thanet Way? Golden plover feed and roost on arable land, the very type of land this proposed development will destroy. The photograph below shows the type of habitat that is suitable for golden plover:



(Source: 'Numbers and distribution of the wintering golden plover population in and around the Thanet Coast & Sandwich Bay SPA 2002/2003 English Nature Research Reports, available online).

(d) – *Retain substantial areas of the existing tree cover and incorporate opportunities for landscape and biodiversity enhancements...*

CCC's *Natural Environment and Open Space Topic Paper*, February 2024 shows that Avison Young is already trying to unpick this (see below), and CCC appears to be accepting its "evidence". It is unclear how removing trees and hedgerows to build 2000 houses, roads, a sewage works, commercial and shopping centre, and two schools can possibly enhance the landscape and biodiversity. The sections of the Topic paper relating to this include:

6.14. The second parcel known as Long Thin Wood, covering 0.41ha, has the potential of being impacted by the provision of primary access to the site. Work is still ongoing in relation to the exact route of the access and its construction so the exact implications for the parcel of ancient woodland is not currently quantifiable.

6.15. However, the applicant has undertaken an assessment of historic maps, which sought to establish if Long Thin Wood meets the definition of ancient woodland. The evidence provided to date suggests that the woodland may not meet the definition of ancient woodland. To be ancient woodland the woodland has to have existed since at least 1600, however the maps available do not appear to show this woodland in situ until at least 1830. In addition, the evidence did not find any ancient trees within the woodland. An Arboricultural Impact Assessment found that no veteran trees would be affected by the access road proposed for the site.

6.16. Therefore, current evidence would suggest that Long Thin Wood does not meet the NPPF definition of ancient woodland.

6.17. The NPPF allows for loss or deterioration of irreplaceable habitats when there are wholly exceptional reasons and a suitable compensation strategy.

6.18. The development of Land north of the University of Kent (Policy C12) is for a new mixed-use settlement which is identified as part of the district's spatial strategy. There are clear benefits arising from the delivery of a circa 2,000 home strategic new settlement development to meet the future housing needs of the district, together with employment land use secured as part of the mixed use proposal.

6.19. If necessary, there is clear potential for a suitable compensation strategy to be devised that mitigates the loss of the ancient woodland and provides significant additional planting within the site to improve habitat connectivity particularly of the Blean Woodland Complex.

6.20. In a precautionary approach, the council has acknowledged in draft Policy C12- Land North of the University of Kent, including reference to draft Policy DS18- Habitats and landscapes of national importance, that Long Thin Wood may ultimately be classified as ancient woodland and the policies set out that any impacts on the woodland must be minimised. If deemed necessary, the council would also expect adequate mitigation and compensation measures and an implementation plan, in line with the policy requirements.

(From: *Natural Environment and Open Space Topic Paper*, February 2024 p. 51)

The signboard at St Comos and St Damian, that is co-sponsored by CCC, refers to the "splendour and tranquillity of this special landscape...", so while CCC acknowledges the quality of the landscape it is proposing to destroy it.

(e) – *Provide the majority of open space in the western part of the site, to avoid coalescence with the settlement of Blean and to minimise impacts on Blean Conservation Area...*

Am I correct in assuming that at least one of the two main roads into the development will go through the Blean Conservation Area, if so how will the impact of this be minimised?

(f) – *Provide green corridors to link wider countryside to the city centre including enhancements to the potential habitat connectivity...*

The “green corridors” will have busy roads cutting through them in multiple places this will not enhance “potential habitat connectivity”. To build the roads Avison Young is proposing to destroy woodland and hedgerows. This development will also push the “wider countryside” between Blean and Tyler Hill further to the north.

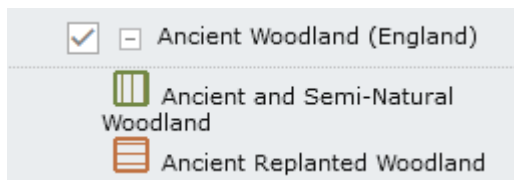
(g) – *Minimise and where necessary mitigate damage to the Blean and Rough Common Green Gap through the provision of the primary access*

This makes little sense: according to the “concept masterplan” the “primary access” road goes straight through the Blean and Rough Common Green Gap, how can you mitigate damage to a green gap when you’ve removed the green gap?

(h) – *Minimise loss of or damage to ancient woodland at “Long Thin Wood” through the provision of the primary access. Retain all other ancient woodland...*

This makes little sense and is poorly phrased, the provision of the primary access cannot minimise the loss of, or damage to ancient woodland. According to the *Natural Environment and Open Space Topic paper* CCC appears happy to accept Avison Young’s “evidence” and all Long Thin Wood could be destroyed with no mitigation put in place, at the very least this important point of connectivity within the Blean Complex will be lost for ever through the primary road into a vast housing estate being routed through it. See above under the heading University of Kent Canterbury Campus Framework Masterplan April 2019 for the University’s own architects’ assessment of the importance of Long Thin Wood (aka Sarre Penn Shaw).

The DEFRA MagicMap site clearly shows that Long Thin Wood is Ancient and Semi-Natural Woodland, see map below:



Source:

https://magic.defra.gov.uk/MagicMap.aspx?fbclid=IwZXh0bgNhZW0CMATAAR1LBo_ItQmFqGee93-cPUA_7FrDSnXd4C73xwx3gMenZ3nB0TWnZ5Lge-U_aem_Ae7NaoEg75qbtI03RQIhbOtsxYyTDunGj8sb0wdr2FUGXv2S2MJIORVIJO29ZAzA8b9WEdjIsWy0yFXQXgg_ZxPV

CCC co-funded the production of the report *A Revision of the Ancient Woodland Inventory for Canterbury district, Kent Report and Inventory Maps*, August 2012, Long Thin Wood and West Triangle Wood are clearly shown on the map as being Ancient semi-natural woodland, see below:



Source: <https://highweald.org/document-library/projects/weald-a-down-ancient-woodland-survey/canterbury-district-ancient-woodland-inventory/?layout=default>

So Long Thin Wood is not of no importance as Avison Young would have it, it's an important link between parts of the Blean Complex, and is important for the health of the Sarre Penn.

(i) – *Ensure that development does not adversely affect the landscape, ecology or setting of the Blean Woodland Complex...*

The development site is within the Blean Woodland Complex area. CCC's own 'Sustainability Appraisal of the Strategic Land Availability Assessment' December 2023 under SLAA319 page 213 states:

Significant negative effects on Biodiversity, Geology, Landscape, Water and Historic environment (site contains a Scheduled Ancient Monument and is adjacent to Grade 2* and Grade 2 Listed Buildings, and likely impacts on the assets and/or their setting),

So clearly CCC does not think 3(i) is deliverable.

(j) – *Enhance biodiversity interest from watercourses, and conserve, enhance and create neutral grassland, heathland and deciduous woodland...Expand and enhance fragmented areas of woodland to improve connectivity*

How much of this deliverable on a site of 102 ha with 2000 houses, about 4800 people, 2000 cars, commercial units, shops, a high street/town square, a sewage treatment plant, and an extensive road system including two main access roads that will fragment existing woodland and hedgerows?



View of Long Thin Wood from the north on 29 May 2024, it appears that the plan is to build a road through the wood destroying its connectivity.

(k) – *Conserve and enhance historic field patterns and features...*

I refer again to CCC's own 'Sustainability Appraisal of the Strategic Land Availability Assessment' December 2023 under SLAA319, page 213, that states:

Significant negative effects on Biodiversity, Geology, Landscape, Water and Historic environment (site contains a Scheduled Ancient Monument and is adjacent to Grade 2* and Grade 2 Listed Buildings, and likely impacts on the assets and/or their setting).

(l) – *Conserve the ProW network across the site ensuring key views from the network are protected...*

This joins an increasingly long wish list, and I do wonder whether much of it will ever be delivered. The reason this point concerns me is because it flies in the face of reality. I will provide an example, there is a seat and information board on the eastern side of St Cosmos and St Damian church, the board discusses the history of the site, and refers to the "splendour and tranquillity of this special landscape...", it invites visitors to look east from the site and they might see sky larks. Presumably

the bench and sign board are sited where they are as it is a good view point, and I would agree with this.



The view to the east from Georgia Wright's Salt Way Seat on 29 May 2024. If the development goes ahead future visitors looking east will see higher density development, a school, and a community hub//town square/high street. There is no possibility that this point is deliverable.

4 Access and transportation

(a)(i) – Improved walking and cycle connections...

On the face of it this is good, however having used the existing cycle routes on the University's campus I can say they aren't very good and are often used by pedestrians. The cycle path from Eliot College to Lyndhurst Close is hazardous. I am aware of two accidents on the University's cycle paths that resulted in injuries. The cycle paths down Whitstable Road from the end of the Crab and Winkle Way are fragmented and not fit for purpose. There is considerable room for improvement.

(a)(iii) – New and improved walking and cycling connections...

How will the existing walking and cycle connections be kept open during the long construction phase when roads will be built through these?

(a)(iv) – Improvements to the ProWs...

How will access to the ProWs be maintained while the site is being developed?

(d) – Provide a primary access point to the site at the junction of Whitstable Road and Rough Common Road...

This is not what the concept masterplan map shows, it indicates that the road will start just south-east of Highfield Close, and the site boundary appears to confirm this. See the aerial view below,

according to your map the junction will be between Highfield Close and Kent College. There is a house and garden in the way at the Whitstable Road and Rough Common Road junction.



According to the concept masterplan the route of the road is also the location of the following:

“open space/biodiversity opportunities – indicative locations”

“green gap”

“opportunities for green corridors”

“opportunities to improve cycling/walking access and safety”

It appears extraordinary that a busy road can deliver all these functions. I assume that the road will run through the Kent Community Oasis Garden, and presumably through the Oaks Nursery. From Avison Young’s communications with CCC it will then go through Long Thin Wood. The Crab and Winkle Way will follow a busy road until I presume the area of Sarre Penn. The primary access point will also connect with an already busy road near to where parents pick and drop off their children. None of this appears satisfactory.

The second access point opens on to Whitstable Road close to where traffic is regularly held up by parked vehicles.

(e) – Minimise traffic flow on to Tyler Hill Road in both directions.

The proposed development extends north and south of Tyler Hill Road, so how will the developer(s) minimise traffic flow?

(f) – Provide an all movement junction at A2 Harbledown through the provision of additional slip roads.

This suggests that CCC anticipates an increase in car use and dependency due to this development (see point 2 (b)). Introducing a further circa 2000 cars into an already struggling road network will not have a positive outcome. Will more countryside be lost to create the “all movement junction”?

(e) – Provide highways improvements to Rough Common Road.

Note that 4(e) appears twice and there is no 4(g).

I have heard that this will entail strengthening the road and removing parking bays. I lived on Rough Common Road for about six years from around 1997 onwards, the traffic was heavy and the 30mph limit often ignored. I spoke to two policemen operating a speed trap and they informed me that their "record" for Rough Common Road was over 80 mph! The village is blighted by the heavy traffic that uses the road. In the late 1990s I contacted CCC about this I was told that traffic calming measures would not be put in place because CCC regarded the road as a sort of outer ring-road for Canterbury. Again this suggests that CCC anticipates a lot of heavy construction traffic and many more cars due to the new 2000 house small town. The village of Rough Common will be further blighted by this proposal.

(h) – *Provide a Transport Assessment...measures to minimise the need for private cars.*

CCC has already referred to the "significant negative effects on transport highways (large-scale car dependent development)", and as noted above wants roads upgraded and new junctions built to accommodate more traffic. It is likely that most "every day" supermarket shops will involve a car journey.

5 Phasing and delivery

As a general point the Phasing and delivery section makes no mention of when any woodland, biodiversity, landscape, views, cycle lanes, footpaths mitigations, enhancements and related work should be delivered.

(a) – *Waste water treatment works...*

What measures will be built in to ensure the Sarre Penn is not polluted?

(b) – *Secondary access should be delivered at an early stage...*

This point appears to relate to point (h), but neither make sense. It appears that the Blean School will need to be completed well before the old school is demolished. The secondary access road can only be delivered once the new school is built.

(c) – *The Harbledown slip roads and Rough Common improvements...*

Doesn't Rough Common Road have to be strengthened for the heavy construction traffic, surely that means at the start of the development, not after 1000 dwellings have been occupied which could be a decade or more away?

Summary of Objections and Final Thoughts

The proposed development is out of scale for the area, it will swamp the villages of Rough Common, Blean and Tyler Hill.

The C12 Policy appears hurriedly drafted, and the plan that goes with it is so vague as to be virtually useless for this consultation exercise.

Sections of the C12 Policy appear to directly contradict other CCC policies.

The C12 Policy directly contradicts the University's own Canterbury Campus Masterplan and some of its strategies.

The development is car dependant, this will cause further congestion issues in and around Canterbury and will blight Rough Common.

The primary and secondary access points emerge on to an already busy road. Both access points appear to cut across or go through the green corridors.

The "splendour and tranquillity of this special landscape" will be destroyed for ever.

The route of the primary access road is likely to be through Long Thin Wood which is designated as ancient semi-natural woodland by various reputable bodies. This wood has been identified as being important for connectivity within the Blean Complex. If this policy is adopted its function as a corridor for wildlife and important biodiversity site will be ended.

The views from and around the Crab and Winkle Way will be lost for ever, it is extraordinary that the suggested site for the community hub/town square, with higher density development, will block one of the best views in the C12 area.

There are various suggestions in the policy as to increased biodiversity, stewardship, green gaps etc, but there is no guarantee that any of this will ever be delivered.

Looking at old maps of Canterbury area it is clear that large areas of the Blean Complex have already been lost to the University of Kent, and there seems to be no end to this destruction in sight.

It is extremely sad and depressing to see the creeping urbanisation of the countryside around Canterbury. It seems that the only plan for Canterbury is that it will continue to sprawl into the surrounding countryside, I am sure the developers are delighted by this prospect, however it is a shame that the views of Canterbury's residents are often not seen as so important.

Stephen Burke

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