

## Alexander Gunyon

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**From:** Robert Sotillo [REDACTED]  
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#### Consultation on the draft Canterbury District Local Plan To 2040

##### Response from:

Robert Sotillo,  
[REDACTED]

Whilst I currently live in York I am on the electoral register for Canterbury and regularly return to the area to stay with my family.

As a single young adult I have a vested interest in the council's approach to providing affordable housing developments, but I am dismayed to find little reference to both affordability and sustainability in the current draft plans.

I understand the council's requirement to build new housing but I have serious concerns about the latest Canterbury District Local Plan, particularly in regards to density of vehicle usage on narrow country roads, but also regarding the challenges of providing appropriate sewerage and the risk to local biodiversity in the ancient woodlands of Blean: an area which provides an eco-system supporting various species rarely found in other parts of the United Kingdom. I have undertaken conservation work here in the past, and am therefore keenly aware of the need to maintain these habitats.

Whilst the strategy sets objectives, many of which are desirable, there is a disconnect between the objectives and the detailed proposals for delivering them. In particular, the proposed development on university land for 2,000 dwellings (policy C12). This development is called a "rural settlement" but it is, in reality, a new town of 2,000 houses being attached to the northern edge of Canterbury, in what is at present the rural gap between the city and the villages of Blean and Tyler Hill.

The size of the development is overwhelmingly large and will impact the existing communities significantly and negatively, by

- removing important green space and runoff and sewage in an area that in previous assessment was considered to not be able to cope with such demands and which the plan simply does not address.
- creating a new community that will be dependent on car transportation for many of its activities, driving traffic onto small rural roads. Rural bus services are simply not frequent and reliable enough for this area and the plan does not show how proposed new bus services will be secured and guaranteed for the future as they are heavily dependent on commercial interests.
- introducing light pollution in an area that is currently shielded from existing Canterbury light emissions.

- building houses that overwhelm existing communities and place sewage treatment works upwind (prevailing south westerly) and in close proximity to established existing communities at Tyler Hill, thereby negatively impacting the quality of life of those communities and adversely affecting the value of existing properties.
- Along with the proposed new reservoir, effectively sandwich Tyler Hill between two large building projects that will blight Tyler Hill for many years.

**I strongly disagree with the proposed development strategy of creating new large developments insufficiently well served by effective public transport in rural areas where the existing road network is unlikely to be able to cope with increased traffic and where existing village communities would be overwhelmed by the proposed size of new developments.**

**I agree with the strategy of creating better public transport infrastructure and services including better bus services and creating a northern entrance to Canterbury West railway station, but I am concerned that the dependence on independent commercial operators means that services will not improve and the council will find that it is not able to afford financial incentives to establish better services.**

Specifically, in relation to policy C12:

1) Site C12 is described in the Sustainability Assessment of the SLAA as a “car-dependent development”, which seems likely even with the council’s new proposed bus policies. The two main access points for traffic are both on Whitstable Road, near the Rough Common roundabout. Rough Common Road would require “highways improvements” and two new slip roads on the A2 at Harbledown to be built – meaning Rough Common would be a major route into Canterbury. There would also be more traffic coming into Canterbury down Whitstable Road to St Dunstan’s roundabout and down St Stephen’s Hill, creating more congestion and affecting air quality.

Canterbury traffic down St Stephen’s Hill and Whitstable Road is already very sensitive to traffic volume and affected by rush-hour volume and school times at St Edmund’s and Kent College and Archbishops schools. The increased traffic that this proposal would generate would, very likely, create significant congestion in addition to existing problems and significantly degrade the ability to travel to and from Canterbury along these routes. These routes are not suitable for the creation of bus lanes and therefore any public transport routed along these two hills would also be affected by congestion.

2) All of the other surrounding roads are narrow, winding/hilly roads with records of speeding and accidents. The proposed development will be on both sides of Tyler Hill Road, but it says it will “minimise traffic flow onto Tyler Hill Road”.

Building on both sides of Tyler Hill Road makes it impossible to stop additional traffic on this road and the alternative proposal to place sewage treatment works on the north side of Tyler Hill Road in such close proximity to the existing community will seriously degrade the quality of life in Tyler Hill.

The Tyler Hill Road is narrow and it is difficult for cars travelling in opposite directions to pass safely at speed. It has blind corners and is not able to take additional traffic safely. I have cycled along this road frequently in the past, including to school when I was growing up. It is intimidating meeting oncoming traffic travelling at speed on such narrow roads. It is tolerable when the roads are infrequently used, but an increase in the volume of traffic would likely result in my deeming it too dangerous to cycle along. This would decrease bicycle usage, rather than increase it, therefore.

3) The Council’s 2021 Landscape Character Assessment describes the “strong rural character” of this area with its mix of woodlands, orchards and farmland, and talks about 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 C12 proposals are incompatible with the 2021 Land Character Assessment, to which the Local Plan is required to conform.

The size and extent of the proposed development will fundamentally change the character of the area of countryside between Canterbury and Whitstable, and the three distinct villages of Tyler Hill, Blean and Rough Common, creating an urban sprawl that runs for miles. This is not compatible with the Council’s own Land Character policies.

4) The proposal would have impacts on many “heritage assets” including the Church of St Cosmus and St Damian as well as its setting, the remains of a Roman Villa and some Mediaeval Tile Kilns (both scheduled monuments), multiple Listed Buildings and multiple Conservation Areas. The council’s Environmental Strategy set out in the Local Plan says “the district’s heritage assets are highly sensitive to change and the council is committed to protecting and, where possible, enhancing the historic environment for future”.

It seems highly unlikely that C12 proposals will allow the conservation areas to be preserved, or that the impacts on heritage sites and their surroundings can be minimised, given the density and extent of the proposed development.

5) The development site is right in the middle of the Blean Woods area, surrounded by various parts of the National Nature Reserve. There are numerous rare and endangered species living in the fields, ponds, hedgerows and Sarre Penn valley. The Council’s other policies (eg SS1.10) say that it will continue to work with partners to extend and improve connectivity of the Blean Woodland Complex, but this development would make connectivity impossible.

The extensive wildlife and biodiversity in the area is extremely important to me at a time when wildlife, including many endangered species, are increasingly under threat and we risk leaving a seriously depleted world for future generations. At a time when many are making significant efforts to reduce their impact on the environment, this proposal is at odds with our desired, and necessary, direction of travel. In particular, I do not believe and this development conforms to policy SS1.10 as it will remove or degrade connectivity of the Blean woodland complex.

6) The proposed development would mean the loss of large areas of “best and most versatile” Grade 2 and Grade 3 agricultural land (scored out of 5). The Local Plan includes a policy to protect the best quality agricultural land outside of urban and settlement boundaries.

We know that there is an ever-increasing need to produce our own food more locally in order to reduce road miles and supply the increased demand for produce. The proposals would seem to work against this need.

7) The two access points for the 2,000 houses are both on Whitstable Road about 400m apart. One of them can only be created by Blean Primary School being demolished and rebuilt elsewhere on the site. It seems ludicrous to demolish an existing, Ofsted-lauded school (one of the few Outstanding primary schools in the area) with no guarantee that the replacement will retain the culture and ethos of the old school.

Much of the Local Plan is predicated on the Bus-First strategy being workable and successful. The Council would like to understand the likely take-up of new bus services by residents in different areas – such as new hopper buses to Canterbury West and looping around the city, and more frequent bus services going into the city centre.

The existing bus service for this area is so infrequent and unreliable that I almost never use the service. Whilst I approve of the aim of improving bus services, it is not clear that this will be achievable, given the dependency on commercial providers who almost always place commercial gain above service needs and the limited council resources that may not be sufficient to persuade the commercial providers to put on services. In any case, there would need to be a considerable improvement in the frequency of services to both Canterbury and other destinations such as Whitstable and Faversham in order to make bus transportation a viable option. The likelihood, therefore, is that the new community would be heavily dependent on car transportation.

Whilst I would approve of improvements to cycle infrastructure in the local area, I have not seen any reference made in the plan to appropriate cycle storage and without this there is no likelihood that I would use my bicycle to ride into town to undertake shopping or stop for a coffee. To encourage cyclists to stop in the town itself and spend money you would need to provide safe, weather-proof bicycle parking facilities.