

Alexander Gunyon

From: Silvia Dobre [REDACTED]
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Categories: Green category

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Name: Silvia Dobre

[REDACTED]
Canterbury District Resident

I am writing to comment on Chapters 1, 2, 5 and 6 and in particular to Proposal C12 in Chapter 2. I want to state my unequivocal disagreement with the proposed plan to construct a new town comprising 2,000 residential units on prime agricultural land that is vital for fulfilling aspirations sustaining local biodiversity but also borders DEFRA-recognised ancient woodland.

The site in The Blean, identified in proposal C12, appears to be favoured by the Council for development, in direct contradiction with The Council's own established policies and guidelines such as the Council's declared Biodiversity Emergency from 2023. Based on Canterbury's exceptional circumstances and unique challenges, developments of such a massive scale and magnitude should only ever be contemplated on brownfield sites and previously developed land.

Should the C12 proposal go ahead and the housing estate be built at the envisaged size, all evidence points to extra traffic of over 3,000 vehicles added to the existing rural roads. There are only two such roads to absorb the immediate traffic: Whitstable Road and Tyler Hill Road. The planned access routes are newly added since the previous Plan. They are both flawed and come with many disadvantages since they would either slice through the green strips, some of it private land surrounded by listed buildings, as depicted in the illustration on page 52 accompanying the C12 proposal, or require the demolition of an outstanding School. They would also not resolve the fundamental issue of a remote rural estate of enormous proportions having to use two existing narrow roads that will not cope with the extra traffic particularly in adverse weather.

The other significantly affected road in the area is Rough Common Road, which is a narrow residential street. Because of the weight restrictions currently in place, it has been confirmed by Council Officials at recent public events that it will necessarily undergo a transformation into a major thoroughfare to accommodate the influx of heavy construction vehicles during the development phase. Subsequently, it would also carry extra thousands of additional passenger vehicles (mostly single occupancy cars) as residents of the new housing estate will use it as a primary route to access the A2 and the Canterbury Ring Road, exacerbating traffic congestion and strain on the road infrastructure. As a local resident I know how important this for myself and all my neighbours who would be facing decades of increased and intolerable noise, pollution and stress because of major change that would be imposed on us without consultation. Our sense of a rural village community would be shattered.

Furthermore, the inherent access challenges that initially led to the rejection of this site during previous assessments have not been adequately addressed or resolved in any meaningful way. The Council seems to suggest that it was only "comparatively fewer negative comments" that resulted in this proposal being resurrected in preference to others rather than look at the multiple underlying reasons for its suitability, which are identified in Table 5-8:

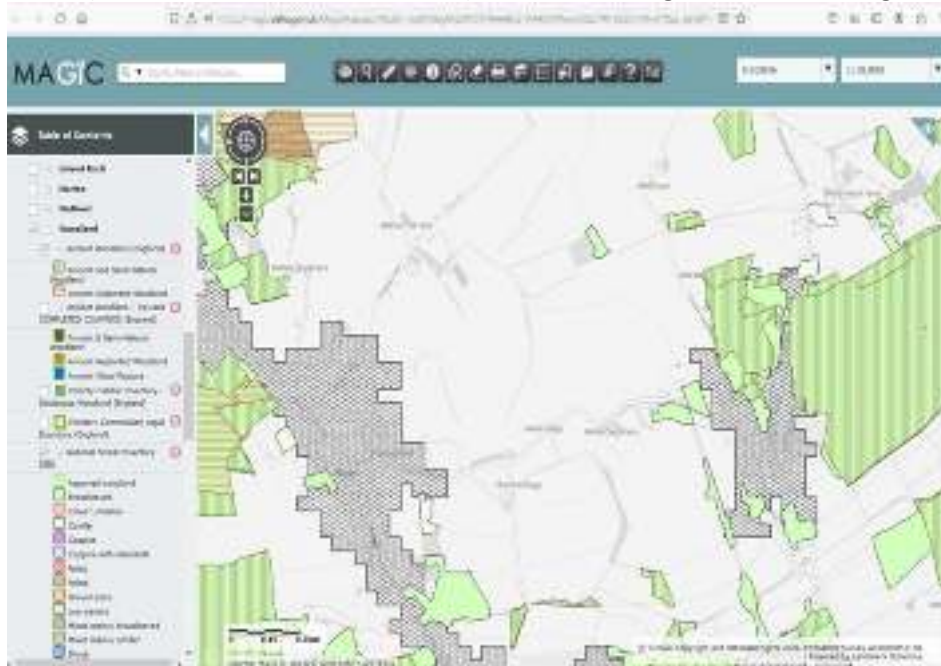
Table 5-8 - Summary SA of proposed new settlement north of University of Kent

SHELAA Site Ref.	Site Address:	SAD 1: Air Quality	SAD 2: Biodiversity	SAD 4: Geology	SAD 5: Landscape	SAD 6: Water	SAD 7: Flood Risk	SAD 8: Heritage	SAD 10: Housing	SAD 11: Land use	SAD 12: Economy	SAD 13: Transport	SAD 14: S. Health and sustainability
SLAA319	Land north of University of Kent	0	---	---	---	---	---	---	---	---	---	---	---

On the well known topic of flooding in The Blean, given the challenging geology of the surface, an increasing number of councils across the UK are having to divert budgets to compensation claims related to flash flooding, as residents of new housing developments hold them responsible for permitting construction in unsuitable locations. It is to be hoped that Canterbury County Council will avoid joining their ranks! Water companies cannot on their own be expected to find and pay for wide ranging technical solutions in the precarious state that they are in, with urgent solutions needed to existing sewage problems. The Council must be playing its part in identifying sites to build on that are at low risk of flooding themselves or of increasing flooding risk to their neighbourhoods due to impermeable surfaces like concrete and tarmac replacing green fields and reducing water seepage into the soil.

If this development ever gets built, the connectivity between different parts of the Blean complex would be hindered, and there would be a rise in disturbance, which contradicts the proposed policies and goals outlined in the draft plan that highlight the significance of ecological connectivity and biodiversity. Rare and protected species currently enjoying the lack of disturbance, such as the often sighted Nightingale, would be threatened.

On the topic of ancient woodland, The West Blean and Thornden Woods reserve is recognised as such on Magicmap, the national mapping resource made available via DEFRA (see image below). On this map both Long Thin Wood (denoted as "Sarre Penn Shaw") and West Triangle Wood are categorised as "ancient and semi natural".



This woodland constitutes the largest expanse of ancient woodland in southern England. It is a vitally important habitat for wildlife in Kent, providing a sanctuary for a variety of rare and protected species such as the Heath Fritillary, Nightingale, Lesser Spotted Woodpecker, various bat species, Slow Worms, and Great Crested Newts. It also serves as a crucial wildlife corridor.

The 2020 Canterbury Landscape Character Assessment & Biodiversity Appraisal which highly relevant aspects relating to to the landscape of the Policy C12 setting and its proximate environment.

Moreover, the BNG (Biodiversity Net Gain) framework for development aiming to leave biodiversity in a better state than before can now be used as a potential mechanism for pushing for biodiversity improvements in new development (<http://kent-planning-network-for-nature.org.uk/posts/biodiversity-in-new-development>). Specifically,

from November 2023, "all new developments in England for 10 or more homes will have to provide a 10% biodiversity net gain"

The Council is proposing to pave over and destroy pristine countryside and natural habitats. Yet it published no relevant details of how it can do so while avoiding damaging the biodiversity in the area earmarked for development, let alone complying with BNG requirements for a net gain. It is imperative that the Council re-evaluates its approach and aligns its actions with its stated commitment to environmental protection, sustainable development, and the preservation of Canterbury's rich natural heritage. Our local taxpayers money should not be spent on litigation. Once lost, the countryside is irrevocably gone. It is easy to imagine that enormous resources will be mobilised locally, nationally and also internationally to oppose the Council on the particular issue of biodiversity loss in The Blean.