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Respond to the “Draft Canterbury District Local Plan 2040”

Dear Victoria,

I am responding as a resident of the Canterbury district on the “Draft Canterbury District Local Plan 2040” (Draft Local Plan 2040) and I would like to comment on below parts:

- Chapter 1 - Spatial Strategy for the district
- Chapter 2 - Canterbury
- Chapter 3 - Whitstable
- Chapter 6 - District-wide strategic policies

As a resident at [REDACTED], I definitely OBJECT to build 2,000 new dwellings on the Land north of the University of Kent campus (Policy C12) and OBJECT to build 1,400 new dwellings on the Land at Brooklands Farm (Policy W4) due to all below impacts:

1. Local health and social care impacts:

I am not 100% convinced that Canterbury District Council had gained 100% agreements from the Department of Health and Social Care to provide specific plans and commitments to increase the NHS services (including new Hospital, Emergency Care Centre (A&E), Medical, Health, Social Care and Dental Facilities, etc.) even there will be a significant population increase due to the total 9,346 new dwellings across the Canterbury District in the Draft Local Plan 2040 in which just under “consideration” stage and only simply mentioned:

“a new or improved Kent and Canterbury Hospital which remains on the shortlist of options being considered by the NHS.” (Chapter 1, Page 21)

“9. Proposals for new medical, health and social care facilities, or for the improvement or enhancement of existing facilities, will be supported on suitable sites across the district and the development accords with other policies in this plan.

Planning permission will only be granted for a loss of an existing medical, health and social care facilities where:

- (a) The disposal of the site is identified within an approved NHS strategy; or
- (b) There is clear evidence to demonstrate that there is no need for the facilities; and
- (c) It is demonstrated that other uses to serve the local community could not operate from the buildings or land.” (Chapter 6, Policy DS10, Page 175)

As a [REDACTED], I had experienced an emergency situation in which I needed to rush to the William Harvey Hospital in the morning with heavy traffic congestion from Canterbury to Ashford and nearly missed my urgent ultrasound scan appointment due to there being no such services in the Kent and Canterbury hospital's Urgent Treatment Centre!

Nowadays, it is already very difficult to have any in-person GP appointment and only can have a GP appointment on the phone or online, sometimes the receptionist at the Medical Centre even asks me to go to the pharmacy to get advice from the pharmacist instead and refuses to arrange a GP appointment for me! Besides, all the Dental Practices are not accepting new normal NHS patients.

Therefore, all the NHS services (including new Hospital, Emergency Care Centre (A&E), Medical, Health, Social Care and Dental Facilities, etc.) will be seriously overloaded in the future once the population significantly increases due to insufficient NHS services within the Canterbury District.

2. Traffic and accessibility impacts:

There is no evidence shown that the Canterbury District Council had done any Transport Assessment before adding this new rural settlement of Policy C12.

In general, most people will have at least one to two car per household to use for daily commute and daily life to travel around United Kingdom, especially they are located at the Land north of the University of Kent campus and the Land at Brooklands Farm as both of the locations are far away from the city centre:

- it is impossible to minimise the cars on the roads after all these proposed 2,000 new dwellings are built and the rest of the new dwellings in the entire Draft Local Plan 2040, including the nearby 1,400 new dwellings on the Brooklands Farm (Policy W4);
- it is ridiculous to just have plans to persuade people to only rely on walking, cycling and public transportations (bus and train) since the overall fares are not cheap at all and are not reliable (due to bad weather, sudden cancellations and strikes, etc.);
- ultimately, both buses and cars will only increase the traffic loading and exceeds the original design of the entire historical city's roads and county roads, creating more traffic congestions and potholes on the roads which will cause serious accidents, it is danger to all the roads users and pedestrians result from drivers, cyclists or motorcyclists swerving to avoid potholes! Will the Canterbury Council prepare to pay and fix all the potholes efficiently? I doubt that as nowadays, there are many potholes on the city centre's roads and country roads are not fixed in time, besides the fixing costs will be suffered by the residents who paid the council tax in return!

After walking, cycling or taking a bus from the rural settlement locations, people need to change to another bus or train to go somewhere further which means the overall fares are not affordable and very inconvenient.

Basically, there are no specific plans on improving the whole Canterbury District's transportation infrastructures, apart from keep mentioning more bus services, adding more park and ride, cycle routes and pedestrian paths but in a historical city, the roads and roundabouts are fixed to be very narrow, even all the street parking areas are branded!

According to the Policy C12, the two main access points for traffic from the Land north of the University of Kent campus are both on the Whitstable Road and through a Conservation area that includes the Crab and Winkle cycle route and Grade II listed buildings, then on the single carriageway (e.g. Hackington Road, Tyler Hill Road), these kinds of country roads are also very narrow, especially at the turning points for the opposite bus to go pass at the same time which will easily cause more accidents if more buses in the future. While the long hilly country roads (e.g. Canterbury Hill and St. Stephen's Hill Road) also not safe for cyclists to cycle along on the single carriageway or country road.

According to the Policy W4, it will "provide primary vehicle access from new east facing junctions on/off the A299 New Thanet Way" (Chapter 3, Policy W4, Page 85) which will also hugely increases in traffic on the South Street, Chestfield Road and the Radfall Hill route into Canterbury.

To be honest, it is impossible to just predict most of the people will travel around by bus or cycling or walking instead of their car as it is impossible and danger for parent(s) with kid(s), disabled people and elderly, besides the bus and train services always not reliable especially during bad weather to go to any kind of health appointments which are not provided at the community hub in the Policy C12 and Policy W4.

At the moment, I have found that some roads in the Canterbury city centre had already painted the "bicycle" logo on the roads as there is no more space to add an extra cycle route, which just made the traffic go slower and created more traffic congestions and accidents!

3. Environmental, wildlife and biodiversity impacts:

According to the "Vision for the district to 2040" in the Draft Local Plan 2040, the Canterbury Council committed that:

"Our important habitats and landscapes will be restored and enhanced, supporting the recovery of nature, improving environmental resilience and providing significant increases in biodiversity.

Opportunities for nature-based responses to climate change and other environmental challenges will be maximised and our urban areas will be greener and healthier."
(Chapter 1, Page 8)

Moreover, as per the "Habitats and landscapes of national importance" in the Draft Local Plan 2040, it clearly stated that:

"6.54 National policies set out a clear framework for the protection of important habitats such as at Sites of Special Scientific Interest and National Nature Reserves, and for proposals which may affect protected species.

The plan reflects this framework to ensure that these important ecological areas are protected over the period of the Local Plan. This includes impacts from new development such as damaging or fragmenting habitats; noise, lighting and dust pollution; construction work and transport.

6.55 Irreplaceable habitats, such as ancient woodland and ancient or veteran trees, are incredibly important and should only be lost for wholly exceptional reasons as set out within the Government's standing advice. As part of any mitigation strategy, appropriate buffers to irreplaceable or priority habitats should be included, having regard to best practice and guidance." (Chapter 6, Page 188)

However, the proposed Policy C12 will be developed on the heart of the ancient Blean Woodlands, as per description on the Woodland Trust website:

<https://www.woodlandtrust.org.uk/visiting-woods/woods/blean-woodlands/>

Blean Woodlands is "Part of once very extensive ancient woodlands that can be traced back to around 1600, when the earliest maps were produced. Contains many native trees such as birch, oak, hornbeam and hazel and a rich mixture of wildlife and wild flowers."

Besides, this extensive ancient Blean Woodlands are also surrounded by the National Nature Reserves (NNR), which is located on an important nature corridor between East Blean Wood NNR and RSPB (Royal Society for the Protection of Birds) Blean Woods.

As per description on the Kent Wildlife Trust website:

<https://www.kentwildlifetrust.org.uk/nature-reserves/east-blean-wood-nnr>

"East Blean Wood is one of the richest of all Kent's woodland habitats... abundant with wildflowers including cownheat, the food plant for the rare heath fritillary butterfly... oak trees with nesting holes for greater and lesser spotted woodpeckers. The bushy re-growth of coppice trees provide perfect nesting habitat for many species of bird including the nightingale and blackcap which feed on the rich insect life."

As per description on the RSPB website:

<https://www.rspb.org.uk/days-out/reserves/blean-woods>

"Blean Woods is a wonderful place for a woodland walk. Our patchwork of traditional coppice woodland, high forest, glades and heathland welcomes Woodpeckers, Nightingale, Hazel Dormice and butterflies – even the extremely rare Heath Fritillary... Some areas of the woodland are made up almost entirely of large oaks and beech trees. These are brilliant for both the Great Spotted Woodpecker and the much rarer Lesser Spotted Woodpecker. In these areas, you'll see standing and fallen trees left to rot and decay, creating shelter and feeding ground for birds, bats and insects. Our areas of heathland and glades are kept open and predominantly free from trees to benefit Woodcock..."

While Policy W4 will be developed nearby the existing ancient woodland at the Convict's Wood and Benacre Wood which is an ecological connectivity to key natural assets.

Obviously both of these Policy C12 and Policy W4 developments will seriously damage the natural environment, ecology, disturbed the rare and endangered species or plants living in these existing green fields, ancient woodlands, hedgerows, ponds and Sarre Penn valleys, etc.

Additionally, as identified in the Habitat Regulation Assessment (HRA), both Land north of University of Kent (Policy C12) and Land at Brooklands Farm (Policy W4) are potential of being Functionally Linked Land for Golden Plover, however in the Draft Local Plan 2040, it only mentioned:

“(c) Assess the site’s potential to be functionally linked land for golden plover, in line with Policy DS17;”
(Chapter 2, Policy C12, Page 54 and Chapter 3, Policy W4, Page 83)

By the way, according to the DS17, there are no detailed assessments and solutions to safeguard the Golden Plover, it only mentioned:

“6. Where there is the potential for a site to be functionally linked land with a SPA, SAC and/or RAMSAR, an assessment of the potential value of the site must be undertaken. Any development considered likely to have significant effects must follow the mitigation hierarchy. Where mitigation measures are agreed by the council, the development will be required to fund and/or implement such mitigation measures.” (Chapter 6, Page 186)

To be honest, once these important landscapes and habitats for the existing rare and endangered species (such as nightingale, golden plover, skylarks, buzzards and sparrow-hawks, hazel dormice, bats, wild plants, etc.) are polluted (noise, lighting, water and air pollution) and destroyed, they are irreversible to restore and enhance, ultimately, all these existing rare and endangered species will lost their habitats permanently!

4. Education impacts:

Before adding the new rural settlement of Policy C12, there is no evidence shown that the Canterbury District Council had done any Education Impact Assessment, no evaluation of the risks on demolishing the current outstanding Blean Primary School and the relocating this school to a new site, no details plan with clear timeline, specific location and how to arrange the existing Blean Primary School’s students, teachers and staff during the whole transition and construction period, it only simply mentioned below in the Draft Local Plan 2040:

“(iii) Resiting and provision of a new 2FE Primary School (2.05ha) to replace existing capacity at Blean Primary School;” (Chapter 2, Policy C12, Page 53)

“(h) The new facility for Blean Primary School should be provided prior to the occupation of 25% of the total dwellings. The new facility must be operational prior to redevelopment of the existing school facilities.” (Chapter 2, Policy C12, Page 56)

As a parent-to-be, I totally understand that there will be serious impacts on education, employment and wellbeing to the current Blean Primary School’s students, teacher, staff and parents due to this nonsense demolition of the school in order to provide the road access for this 2,000 new dwellings on an unsuitable rural settlement of Policy C12. Besides, there will be safety issues among students when opening another road access point on the Whitstable Road as it is opposite Kent College.

5. Utilities infrastructure impacts:

Obviously the huge additional population growth in the entire Canterbury district will also place high pressure on the utilities infrastructure such as fresh water supply and wastewater treatment, even though in the Local Draft Plan 2040, it mentioned that there will be “delivery of a new fresh water reservoir at Broad Oak to provide adequate water supply over the long

term” (Chapter 1, Page 21), we will still need to face uncertainty over the fresh water supply due to the drought risks during the long hot summer without sufficient rainfall!

Regarding the waste water treatment, there is no details plan shown that where it will be located in the Policy C12, it only simply mentioned:

“(iv) Provision of new high quality waste water treatment works at an appropriate location within the site;” (Chapter 2, Policy C12, Page 53)

“(a) Waste water treatment works should be delivered at the earliest possible stage in the development.” ((Chapter 2, Policy C12, Page 56)

While I cannot find any information on the waste water treatment plan in Policy W4!

Besides, there is no Odour and Noise Assessment and solutions to ensure no odour and mitigate any adverse noise impacts from the adjacent Wastewater Treatment Works.

In the Draft Local Plan 2040, there is no guarantee that the sewage from the additional new dwellings in Policy C12 and Policy W4 development will not highly affect the water quality feed into the watercourses due to the harmful nutrients such as phosphorus and nitrogen.

Moreover, all these overwhelming releases of sewage will adversely affect the habitats and pollute the local beaches nearby, result in beach users becoming acutely ill and affect the local seafood supply to the restaurants, especially in the Whitstable and Canterbury’s tourist destinations.

6. Heritage Impacts:

As per the “Environmental strategy for the district” in the Draft Local Plan 2040, it clearly stated that:

“1.22 The district’s conservation areas, listed buildings and other important heritage assets, all make a significant contribution to the character and the identity of our district.” (Chapter 1, Page 11)

“1.26 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 generations and to positively exploit the benefits for the economy.” (Chapter 1, Page 11)

However, the 2,000 new dwellings in Policy C12 which is proposed to build will definitely change the distinctive character, damage the attractive qualities of the areas around all the heritage assets, including the remains of a Roman Villa and the remains of the Mediaeval Tile Kilns (both are monuments), the St Cosmus and St Damian Church, the Grade II listed Church and other Grade 2 Listed Buildings and Conservation Areas due to loss of green fields and the new dwellings which will not reference and respond to the historic interest.

While the 1,400 new dwellings in Policy W4 also have the above same heritage impacts as it is proposed to local near the heritage assets, including the Grade II listed buildings and any curtilage listed buildings at Brooklands Farm, Rayham Farm and Barn.

7. Agriculture impacts:


According to the “Policy DS12 - Rural economy” in the in the Draft Local Plan 2040, it clearly stated that:

“The council will seek to protect the best and most versatile agricultural land for the longer term. Any development on agricultural land will need to be supported by an Agricultural Land Classification Assessment. Development on unallocated agricultural land that would result in the significant loss of Grades 1, 2 and 3a agricultural land will only be permitted where it can be demonstrated to be necessary to meet a local housing, business or community need and a suitable site within urban areas and settlement boundaries or on poorer quality land cannot be identified.” (Chapter 6, Policy DS12, Page 178)

However, the 2,000 new dwellings in Policy C12 and 1,400 new dwellings in Policy W4 which are proposed to be built would contradict the above Policy DS12 as that would result in the significant loss of all these best and most versatile agricultural lands forever!

Conclusion:

Summarising all the above impacts, I sincerely ask you and your Canterbury City Council’s Local Plan Consultation team to openly listen to all the objections on the Policy C12 and Policy W4 which have been submitted and permanently remove the plan to build 2,000 new dwellings on the Land north of the University of Kent campus (Policy C12) and permanently remove the plan to build 1,400 new dwellings on the Land at Brooklands Farm (Policy W4) from the “Draft Canterbury District Local Plan 2040”.

As a house owner at , I am also worried that most of the neighbourhood properties will be blighted and lose their original values due to all the above impacts, will the Canterbury City Council prepare to bear all these Blight Claims from the neighbourhood properties’ owners in the future?

I understand that there are targets from the Government on building new dwellings but please consider only building all these new dwellings on suitable sites which are not near or located at all existing green fields, ancient woodlands, National Nature Reserves and agricultural lands.

Thank you very much for your consideration and attention.

Best regards,



Mrs. Shi Yan STONE

