

## Comments on the Draft Canterbury District Local Plan 2040

As a long term resident of [REDACTED] and a former member of the [REDACTED], I submit my comments on the City Council's Draft Plan 2040 with particular emphasis on section C12 which addressed the use of land north of the University of Kent.

The plan for C12 seemingly contradicts both the Council's and University's assessments and commitments to environmental sustainability and to the sustainability of our rural communities. The previous 2022 Strategic Land Availability Assessment found this proposed site to be unsuitable for development with major access issues and with conservation, landscape and heritage and ecology concerns. One of these issues, with the exception of an (unfeasible) attempt to the access issue, has materially changed nor been adequately addressed in this plan. The site will have major impact on Natural England Priority Habitats, Ancient Woodland, local nature reserves in Tyler Hill and Blean, The Crab and Winkle; the historic church of St Cosmus and St Damien, the remains of a Roman Villa, a Bronze Age ring ditch and burial ground and grade II protected properties Blean House and Hothe Court. I can't help but reflect on my own experiences in attempting to make a minor adjustment to my garage at the rear of my property which was denied because it would detract from the facade at the front of my house for which it has a grade II listing. This change was both minor and not within view of the front of my house, yet this District plan would significantly undermine the nature and character of an entire community.

The University of Kent has long espoused a strong commitment and affinity with its local communities, bot with the City as well of the local rural communities it abuts. It has also long voiced its commitment to environmental sustainability and the provision of a green campus environment which has welcomed generations of students. This proposed development runs counter to all that it has formally supported. It is also well known that University is experiencing serious financial problems and the selling of this land for such a significant development would ameliorate these problems. Nonetheless, it will not solve them. Recruitment patterns (Brexit and government policies on migration have had a detrimental effect on student numbers and , in the case of Kent, its league table position) and student expectations and behaviours have changed significantly, particularly since the pandemic. Students prefer to spend less time at university and in face-to-face teaching and this has lessened the demand for student accommodation. The University would do better to look at how it delivers its teaching and perhaps look to redevelop its exiting campus site. It has an existing infrastructure and buildings which could be repurposed and sold for housing, This would have a negligible environmental or social impact on any of our communities, including the University's. Similarly, the Council should revisit the student housing it is locating on the riverside and within the city to see if that too can be converted to deliver its spacial strategy in a more sustainable fashion.

More specifically, my comments on the following from the Draft District Plan:

2.15 ...highly sustainable, free standing settlement...

Such a development can not and will not be sustainable nor free standing. The impact on not only the villages of Rough Common, Blean and Tyler Hill but also on the City will be significant, from the environmental impact on agricultural and rural land, to the impact of the communities it will physically touch to the increased population and resultant traffic, we will all know that it is there. There are not sufficient GPs, inadequate hospital and emergency services, insufficient secondary school places and the roads nor the public transport are not adequate for the existing population let alone for further population increases.

As for the council's spacial strategy for development, Canterbury City Council and in fact Kent County Council, need to reflect on the immense development works that have been undertaken across the city and county in recent years. Then City in particular does not have the infrastructure or facilities to support such growth and it should be asking the government to reconsider its approach to setting housing targets with its focus on numbers set in 2014 considering the dramatic increase in housing since then. Canterbury has little industry and business other than its heritage

status/tourist destination and the universities/education, destroying the character of the city will undermine the attractiveness of both of these.

2.16. ....movement and transport infrastructure...

While the City's transport strategy has many commendable aspects, the plan for C12 remains, nonetheless, dependent of access from the Whitstable Road and across Rough Common. Both these routes are already under considerable strain and the introduction of 3-4000 cars will exacerbate the traffic gridlock Canterbury experiences.

While there is a desire to be 'bus led', there is little in the way to show that this can be delivered in a sustainable way. Current reliance on a profit-driven private provider demonstrates that. The topography of the area means that only the fittest and the bravest would attempt to cycle those hills in such traffic. Also, without a bus led scheme in place prior to occupation of the site, the likelihood that people will change their behaviour should such a scheme become available is negligible—once settled into a way of living such changes rarely happen.

The location of the site, adjacent to three schools and the University, one of the largest employers in the region, means that the concentration of cars at key points of the day is already difficult, any increases will make these roads impassable.

The intersection of C12 with Tyler Hill Road, already a busy rat-run cut through means this road too, narrow, with dangerous bends and impassable for certain vehicles, will become more dangerous, forcing even more foot traffic and cyclists into their cars. The impact this increase in traffic will have on these villages will be devastating. My property and my neighbours property have already been hit numerous times and cars clipped as they attempt to leave their driveways. This site is simply, as the 2022 SLAA already ascertained, not suitable for such a development.

2.17. create new large areas of open space... significant separation from Blean and Tyler Hill and improved ecological connectivity between natural assets...

I'm still trying to figure out how you build 2000 homes and a community centre and two schools and CREATE new large areas of open space. Or improve ecological connectivity between natural assets. Or show 'significant' separation from either Blean or Tyler Hill when both communities, as well as Rough Common, will bear the brunt of this development from the first build and there after. This statement is ludicrous.

The environmental impact and the cost to wildlife and biodiversity in the area will be devastating, The site is a haven for over 60 species of bird, some of which are endangered and other wildlife, particularly badgers, hedgehogs, foxes, voles, weasels and protected species of bats, all of which are reliant of the hedgerows and the ancient woodland. Once these are removed, they will not reappear. The area is already a green corridor that connects the rural with the city and acts as a green lung for our communities.

There is very considerable concern to the impact of such a development on the Sarre Penn. The water table in the area is already very high and subject to flooding. Any removal of permeable land will simply exacerbate this problem. Any of us already live with streams or wells which are impacted by this and there is considerable risk to our properties should drainage be affected. Furthermore, this site is home to the Sarre Penn, an important waterway—how will the Sarre Penn be protected from the likely outflow of polluted water from this site. The county is already under considerable pressure with severe underinvestment (or call it what it is, theft) from SouthEast Water and this development will only contribute further to this.

2.18. new community hub for day-to-day services and new primary school, redevelop Blean Primary

These sound like positives, but it is well known that such promises very rarely, if ever, fulfil expectations.

What day-to-day services are to be included, a medical centre? Pharmacy? No doubt local shop and recreation hall. But it is the medical centre which is most imperative, and while that might be built, can it be serviced with the national shortage of medical staff?

With so little detail on where Blean School will be rebuilt, how access will be facilitated into/across/alongside a major building site and the resultant filth and disruption means it is impossible to comment. The inclusion of a new, additional school within (supposed) walking distance appears ripe for comparisons and issues around desirability (this is human nature) and may set a negative precedent for ranking and selection.

## 2.19 Community and business services and mixed housing

Mixed housing is a feature of all developments, but how will this be balanced and delivered, how will the desires of the developer be balanced against demand/community needs.

What demand is there for community and business services? The University already has an Enterprise Centre which it had struggled to fill, most of the space was being used by the University.

In conclusion, the infrastructure of our county, our city and our rural communities are already under much pressure from water supplies, to sewage to waste management to traffic and transport to medical from all the current development, that this proposal along with the additional proposals for build in Whitstable mean that the area can not withstand much more without significant detriment to our way of life. In particular C12 runs counter to the aspiration of the City and the University and our rural communities to ensure a 'green gap', to conserve our landscape and to protect our environment and heritage. It will place enormous pressure on our communities and our infrastructure with very significant concerns around the access plans and the volume of traffic and the demise to our landscape and bio-diversity. Furthermore, the UK already imports a significant amount of its food, made much more difficult post Brexit, the use of agricultural land runs counter to any strategy to increase food production and to sustainability.

I therefore strongly urge the Council to withdraw C12 from the Draft Plan. I also encourage the Council to protect our city and rural communities by engaging with the government to reconsider its housing plans based on the very significant build since 2014.

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