

Canterbury City Council
Canterbury City Council Offices
Military Road
Canterbury CT1 1YW
03/06/2024

Dear Sir or Madam, please find below my response to the Regulation 18 Consultation relating to the Draft Canterbury District Local Plan to 2040.

I object to Policy C12 - Land north of the University of Kent, on the grounds outlined below:

The landscape character and biodiversity of this area of land is considered at length in Chapter 6 (Canterbury Landscape Character Profiles) of the Canterbury Landscape Character Assessment and Biodiversity Appraisal, October 2020. In this publication the land now referred to as the Land north of the University of Kent is included in a discussion of a larger piece of land, Amery Court Farmland (E3), which includes additional land to the east and west of that indicated in Policy C12.

E3: Amery Court Farmland



Included within the Aims and Guidelines for the area E3: Amery Court Farmland and elsewhere within the document are the following (in italics):

- 1. Enhance and reconnect woodland to create a very extensive block of habitat, particularly through the maintenance and restoration of coppice management.
- -Conserve and enhance the biodiversity interest from watercourses and wetland habitats of the minor streams that cross the area including the Sarre Penn and Denstroude Brook.
- -Enhance small, fragmented areas of deciduous woodland within this LCA to maintain and enhance the connection with other areas in the wider Blean area prevent further fragmentation and loss of connectivity.
- -Increase the extent of native deciduous woodland, using locally occurring native species in order to link to existing woodland. Seek to avoid the introduction of coniferous boundaries or shelterbelts.
- -Conserve, enhance and create neutral and acid grassland, which covers a substantial area of this LCA as part of the county-wide targets.
- -Habitat opportunity mapping identified key opportunities within the BOA for habitat creation of fertile soils woodland, neutral grassland and a small section of acid grassland and heath.
- -Manage and enhance the arable fields by encouraging the creation of uncultivated field margins and other wildlife friendly farming methods.
- -Conserve and improve the traditional/Medieval landscape pattern and structure, as well as increasing biodiversity interest through the maintenance of hedgerows along roadsides and along historic field boundaries.

These are entirely laudable aspirations for the land and the settlements within it but they cannot be delivered if the proposed development outlined in Policy C12 of the Draft Local Plan to 2040 is adopted. The aims and guidelines recognise the crucial importance of habitat connectivity in the maintenance of biodiversity and the loss of this land to a built environment would disrupt any existing connectivity let alone 'enhance the connection with other areas in the wider Blean area (sic) prevent further fragmentation and loss of connectivity' and must, as a consequence, impact adversely on the already compromised biodiversity of our county. Amongst the threatened breeding species on the land within the Policy C12 boundary are Nightingale, a summer migrant to the UK. A Kent Ornithological Society nightingale survey in 2023 revealed the presence of three singing males within the site (at TR129608, TR129603 and TR126603). The bird located at TR126603 was in the parcel of ancient woodland known as West Triangle Wood. The continued presence of breeding nightingale populations would be compromised by the densely populated housing development proposed.

2.-Maintain the essentially linear pattern of Blean and Tyler Hill villages avoiding further infilling or extensions that would create a greater urban extent. Maintain the open rural gaps along the main north south road routes allowing views into the wider rural landscape and woodland, maintaining separation between built areas.

-Conserve the rural character of the landscape ensuring that it continues to play a role in the separation of Blean and Tyler Hill with Rough Common and the University of Kent to the south, and particularly the role of the Sarre Penn Valley in defining the southern edge of development in relation to the Stour Valley slopes.

A new build of around 2,000 new dwellings plus associated commercial and infrastructure buildings on land that is currently farmland inevitably fails to 'avoid infilling or extensions that create a greater urban extent'. The areas indicated as 'Open space/Biodiversity opportunities' on the Policy C12 Concept Masterplan (p52 of the Draft Local Plan) are nominal in scale and would not satisfy the commitment to 'play a role in the separation of Blean and Tyler Hill'. This would be particularly the case on the eastern, Tyler Hill, side. The rural character of the landscape would not be conserved.

3.-Maintain the limited road access within the area away from the main north-south routes and maintain the rural character of the few lanes that cross the area.

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In recent communications Avison Young have stated that Tyler Hill Road would not be relied upon for access to the development. As the two western access routes for the new development would cross Tyler Hill Road it seems an impossibility that some of the likely 2,000+ cars associated with the development would not use Tyler Hill Road and this likelihood is even greater when one considers that this road would almost certainly represent access to the site from the east. The rural character of this narrow country road, which already has a poor safety record, would certainly not be maintained.

4.-It is a rural area with a woodland backdrop and some experience of tranquillity and dark skies away from the settlements. It has a strong association with the surrounding Blean woodlands and is experienced as part of this wider landscape by people accessing the area for recreation along the Crab and Winkle Route or promoted Blean walks along the Sarre Penn Valley.

-Protect the valued recreation access opportunities representing by the numerous PRoW and locally promoted routes linking Canterbury City, the Blean woodlands and the coast.

The value of this rich rural landscape as a recreational resource for the East Kent (and wider) community is also recognised in the aims and guidelines and, indeed, elsewhere in the document it is noted that: 'It is a rural area with a woodland backdrop and some experience of tranquility and dark skies away from the settlements. It has a strong association with the surrounding Blean woodlands and is experienced as part of this wider landscape by people accessing the area for recreation along the Crab and Winkle Route or promoted Blean walks along the Sarre Penn Valley'.

The importance of access to green spaces for our health, both physical and mental, is well established. The areas marked as 'Open space/Biodiversity opportunities' on the Policy C12 Concept Masterplan would represent amenity green space rather than natural or semi-natural green spaces. The building on this new settlement would, therefore, represent a loss of 10% of the approx. 1,000Ha natural and semi-natural green space currently within Blean (CANTERBURY CITY COUNCIL OPEN SPACE ASSESSMENT REPORT AUGUST 2022). A recent study showed that the elevated degree of biodiversity present in natural green spaces is key to the mental health benefits of nature (Smartphone-based ecological momentary assessment reveals an incremental association between natural diversity and mental wellbeing' by Hammoud, R. et al. Scientific Reports. DOI: 10.1038/s41598-024-55940-7). A review of this study notes:" to our knowledge, this is the first study examining the mental health impact of everyday encounters with different levels of natural diversity in real-life contexts. Our results highlight that by protecting and promoting natural diversity we can maximise the benefits of nature for mental wellbeing. In practice, this means moving away from heavily curated monocultural pockets and parks of mown grass, which are typically associated with low biodiversity, towards spaces which mirror the biodiversity of natural ecosystems. By showing how natural diversity boosts our mental wellbeing, we provide a compelling basis for how to create greener and healthier urban spaces."

The loss of this recreational resource would surely impact adversely on the mental and physical wellbeing of the county's residents.

It is for the above reasons that I object to Policy C12- Land north of the University of Kent of the Draft Canterbury District Local Plan to 2040.