

I should like to object to the proposal to include Site C12 as a Proposals Site in the 2040 Local Plan on the following main grounds detailed below:

1. The scale and extent of the proposal is totally out of character with the surrounding, primarily, rural landscape and will fundamentally change its character;
2. Contrary to NPPF policy and to existing (2017 Plan) and draft (2040 Plan) policies;
3. Adverse and detrimental effect on Conservation Areas contrary to the local authority's statutory duty in this regard;
4. Adverse and detrimental effect on the Blean Complex SAC/Blean Woods SSSI contrary to the local authority's own policy adopted in its 2017 Plan

Whilst the proposal says that *'the new rural settlement will take a linear form and provides important opportunities to create large new areas of open spaces, creating significant separation from Blean and Tyler Hill...'*, these open spaces already exist and, in fact, will be significantly reduced as a result of the proposal. Blean and Tyler Hill are already very close and the proposal will, effectively, join them together destroying their rural village character together with the setting and context of the Blean and Tyler Hill Conservations Areas.

In the NPPF Section 15 Conserving and Enhancing the Natural Environment - Paragraphs 180 to194 place significant value on protecting the environment. For example:

- a) Para. 180 states that *'Planning policies and decisions should contribute to and enhance the natural and local environment...'*

One of the main access points to the proposed site is at Blean School which is approximately 200 metres from the Blean Complex/Blean Woods SAC/SSSI. In the local authority's 2017 Plan, Policy LB5, Para10.37 it states the following: *'The Blean Complex Special Area of Conservation SAC - The main interest feature of this site is the oak hornbeam forest. Lack of coppice management and **deterioration in air quality are considered to be the main vulnerabilities for this important woodland. Proximity of roads to sensitive habitats and any physical barriers between the road and the habitat that filter air pollution are key issues.** The probable impact of predicted Annual Average Daily Traffic (AADT) along the Blean Road (A290) (which is within 200m of the SAC) resulting from housing allocations in the Local Plan has been calculated using the approach set out in the Design Manual for Road and Bridges. This result concluded that there was unlikely to be a significant impact on the Blean SAC resulting from air pollution from increased housing, in particular nitrogen deposition. **However, it is important that there are no further decreases in air quality to the detriment of sensitive parts of the site.** Recreation levels at the Blean SAC will need to be monitored, but it is not currently a particular concern, due to the current access management and educational programme on this site. The City Council will work with the managers (RSPB, KWT) of the site to understand any potential impacts from future developments.*

Comment: Therefore, in accordance with the above, it was considered that any further housing allocations (post 2017) would be detrimental to the SAC/SSSI

- b) Para 181 *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries;*

See comment at Para a)

- c) Para 186 states that *'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful*

*impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*

See comment at Para a)

- d) Para 188 states that '*The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.*'

See comment at Para a)

In the draft 2040 Plan under Proposal Site C12 Para. 2(e) it states that '*...No residential development shall take place within 400m of the Blean Woods SAC;*'

Whilst no actual built development may be proposed with 400 metres, the critical point here, and what will be detrimental to the SAC/SSSI, is the increase in traffic along the A290

Blean and Tyler Hill are both Conservation Areas (CAs). My understanding is that this designation places a statutory duty on the local authority to preserve the character and appearance of the CAs and to bring forward proposals for their preservation, and enhancement and to pay special attention to the character or appearance of them in exercising their planning powers, including their relationship with the surrounding areas.

If approved, the development of the land between Tyler Hill and Blean will destroy the character and context of both CAs contrary to the local authority's statutory duties in this regard.

Indeed, Proposal C12 in the 2040 draft Plan at Para. 2(f) states that any developer should '*Assess Areas of Archaeological Potential and mitigate any impacts on heritage assets such as the scheduled ancient monument adjacent to the St Cosmus and Damian church, the Grade II\* listed church and other Grade 2 Listed Buildings adjacent to the site, and **Conservation Areas within and adjacent to the site.***'

In the Council's adopted 2017 Plan it is stated, in Policy SP4 that '*In the villages of Adisham, Bekesbourne, Bossingham, Broad Oak, Hoath, Kingston, Petham, **Rough Common, Tyler Hill, Upstreet, and Wickhambreaux, priority will be given to protecting the rural character of the district and infill development of an amount appropriate to the size of the settlement (or development to meet an identified local need for affordable housing), in a location appropriate to the form of the settlement and of a design and **scale that respects and enhances the character of the village;*****

In the draft 2040 Plan at:

Paragraph 1.22 it states that '*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.*'

All of these policies will be detrimentally affected if the proposal is allowed to go ahead.

In the draft 2040 Plan under Proposal C12, 4(e) it states that developers should '*Minimise traffic flow onto Tyler Hill Road in both directions;*' 'Minimise' is purely subjective in meaning and could be a substantial increase which has been minimised. It's impossible to see how a significant increase in traffic will not occur given that the development of the Community Hub is proposed immediately to the south of Tyler Hill Road and other significant development is proposed adjoining the Hub and to the north of Tyler Hill Road.

All but a marginal increase in traffic along Tyler Hill Road will be detrimental to the character, context, setting etc. of the Blean and Tyler Hill Conservation Areas.

As stated in the Parish Council's objections, it appears that there has been extensive discussion between the University, Canterbury Council (CCC) and Kent County Council (KCC). The concern is that the proposed site has been 'unlocked' by KCC agreeing to transfer its land (Blean School) to the developer in return for a brand-new school (possibly two) – this is obviously very attractive to KCC and CCC, given the age and condition of the existing Blean school.

In order for the developer to recoup this cost a critical mass of development will be required (amounting to hundreds of units) and this discussion/agreement may have probably occurred as part of the discussions between the interested parties. Given the other infrastructure costs and affordable housing etc. required, a huge scheme of development will need to be approved for the development to be viable.

In addition, Kent University, along with the rest of UK universities are in significant financial difficulties and a windfall development will be extremely attractive to them and the Councils, given the importance of the student population to the local economy. However, the financial difficulties in the Higher Education sector should be solved by Government in a wholesale review and not by piecemeal windfalls to the detriment of the local environment