



By email only: consultations@canterbury.gov.uk.

3 June 2024

Dear Sirs

My comments within this letter are predominantly focused on **Policy C12**, and the land north of the University of Kent (“UoK”) within the draft Local Plan (“DLP”) to which I am **objecting** in the **strongest** possible manner. I have needed to spend an extraordinary amount of time researching and looking into this proposal predominantly due to the sheer number of different failings it has. However before I provide my comments on that policy I have some on the consultation process which we are currently within.

I should explain that my comments in this letter are arrived at by attending the three consultation evenings, attending a call with the UoK and Avison Young and from attending a meeting between Canterbury City Council (“CCC”) and the three parishes of Blean, Tyler Hill and Rough Common. I have asked questions, where permitted to, and have listened to the answers given and not given in order to reach an opinion.

Consultation procedural matters

During the consultation period which commenced on 12 March 2024 there have been a number of areas of concern for me and I list these below:

1/. When it was voted by the Canterbury City Council Cabinet Committee on the evening of 11 March 2024 to approve the DLP for consultation they voted to approve the documents that were contained within the 629 page PDF Agenda on the Canterbury City Council (“CCC”) website. At page 303 the Sustainable Design Guide begins. It is clear when trying to read through it, as I have, that there are material formatting errors to such an extent that the content is incomprehensible. I do not understand how the Cabinet can vote to approve such a document when it clearly cannot be read, and therefore understood, by those voting on it. The link to the relevant document is below.

<https://www.canterbury.gov.uk/sites/default/files/2024-03/Cabinet%20agenda%2011%20March%202024.pdf>

2/. I am not clear on whether CCC have complied sufficiently with Section 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 in that they have not notified residents within the villages of Blean, Tyler Hill and Rough Common with regards to the new settlement (and resulting traffic) which it is proposed is inflicted upon them. I think it is quite possible that they should have informed those residents more proactively under section 18 (2)(c) given that they are the ones most

greatly affected. This could have been achieved via a leaflet drop in the affected parishes. Instead it has been left to the residents to communicate the Council's draft Local Plan and to raise awareness.

3/. On 12 March 2024 it was announced on the CCC website that during the 12 week consultation that a total of just three public information sessions will be held. I question whether this is proportionate engagement with residents of the district.

- Three sessions, each of two hours, during a 12 week period is inadequate in my opinion given the population of the district;
- The format of the evenings was that attendees had to listen to a presentation for around 50 minutes on the local plan before questions could be asked. It is my belief that this format was chosen to limit the amount of time available for members of the public to speak and ask questions of the officers present. It meant that members of the public, 165,000 within the district based on evidence papers, had just over 3.5 hours access to Council officers during a 12 week period.
- There should be in future consultations the option to speak one on one with Council officers rather than Council officers selecting those people within the audience that they wish to ask a question.
- The venues selected were inadequate both in terms of the facilities provided at them (Whitstable the sound system caused great discomfort to Council Officers, in particular Ruth Goudie, who struggled to project her voice to the back of the Umbrella Centre) and size of the venue. At Canterbury's Guildhall which has a capacity of 120 there were in excess of 200 local residents who had tried to attend with many being denied the opportunity to ask questions and hold the Council Officers responsible for the draft policies that they have created. Why was a larger venue not selected? I cannot comprehend why a venue with a 120 maximum capacity was selected when a new policy C12 has just been introduced which will so severely impact existing residents in Tyler Hill, Blean and Rough Common as well as those residents located nearby in northern Canterbury who will be affected by the increased private vehicle journeys. Why is it a surprise when affected residents in those villages mobilise on mass.
- Why was an information session not held in either of Tyler Hill, Blean or Rough Common village halls given that the material change for this Local Plan was the introduction of Policy C12.
- Further the first session started on 23 April, some 40% of the way through the consultation period.

Below is the announcement which appeared confirming the three engagement events on the CCC website:

We are also holding a number of engagement events in the coming weeks, including three public information sessions across the district where you can come and talk to council officers about the draft Local Plan in person:

- **Tuesday 23 April, 6pm to 8pm:** Herne Bay Baptist Church, High Street, Herne Bay, CT6 5LA
- **Wednesday 24 April, 6pm to 8pm:** Whitstable Umbrella Centre (St Mary's Hall), Oxford Street, Whitstable, CT5 1DD
- **Monday 29 April, 6pm to 8pm:** The Guildhall, St Peter's Place, Canterbury, CT1 2DB

Please note that these events are not drop-in style. While people can arrive whenever they like, each event will begin with a presentation at 6pm with an opportunity to ask any questions you may have afterwards.

You don't need to register to attend – simply come along on the day.

4/. All information is electronic and alienates a large proportion of the older population in the district who are not online. Whilst a copy of the DLP can be obtained for a fee the interactive map, link below, is an example of something that is not available in a hard copy format.

<https://experience.arcgis.com/experience/1e8c61757821421e8dc7d1eab938ed98/?draft=true>

5/. On 7 May 2024 there was recognition of the Council's consultation shortcomings when it was announced to a select group of the district that a fourth evening would be held to provide the opportunity to ask questions. This event was not made public on the Council website which remained as first published. For an unknown reason the event was not held as advertised as the 30 minute opportunity to ask questions of Officers one to one before the end was removed. Further although I think I understand the reason for it being advertised as for those unable to attend previous consultations it perhaps should have been worded as being for those unable to ask questions at previous meetings. Even this though would deny residents the opportunity to ask questions, plural not singular. Everyone should be permitted to ask questions and the Council are clearly stifling this.

7 May

An extra public consultation event on our draft Local Plan has been added to the calendar.

Designed for those who have not managed to attend one of the three previous meetings, it will take place between 6.30pm and 8.30pm at the Westgate Hall, Westgate Hall Road, Canterbury, on Tuesday 21 May.

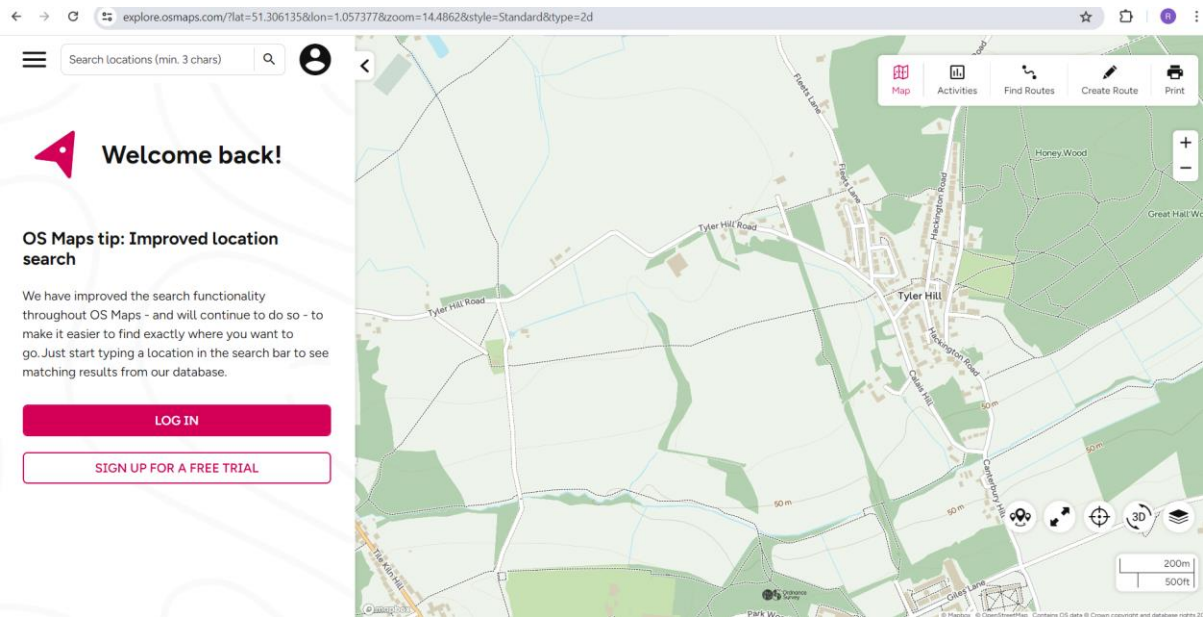
The format will include the same 45-minute district-wide presentation as that delivered at the other venues plus a 45-minute question-and-answer session and 30 minutes for people to ask questions, raise their concerns or offer their support less formally and more privately.

There will be no new information shared.



Visual map of Policy C12 on page 52 of the DLP - errors

1/. There is no wood on the east side of the site providing a barrier and separation between the proposed development and Tyler Hill. This was highlighted to CCC Cabinet Members when the DLP was approved for consultation but it has remained within the map during the consultation period. I have emailed Charlotte Cornell who when approving the consultation period advised that the map should be updated. This has not happened. I attach my email conversation with her in this regard. Firstly it is an important point as it is suggesting a greater physical separation between the new development and Tyler Hill than that which actually exists. Secondly the email advises that the officers were literally publishing the DLP when it was being voted on. Clearly the vote should take place first and then it should be published after any requested changes have been made. I cannot understand why it was being published as it was being voted on. Thirdly when attending the Herne Bay drop in I was advised by Andrew Thompson that the map was obtained from Ordnance Survey. However if it was it was obtained years ago and clearly should have been updated. Below is a screenshot taken from the current Ordnance Survey website showing a field, not a wood. I cannot help but wonder who prepared the C12 map, was it CCC or the site owner and their agent. If the agent it is potentially deliberate.



2/. Green arrows visually represent positive opportunities. Yet the largest arrow (both the longest and widest) is misleading and completely misrepresents the opportunities that a developer has open to them. Clearly they cannot control what happens outside of the site and this arrow is outside of the site. Further 25% to 30% of the arrow runs across land that I own adjacent to it. I am told C12 is conceptual at this stage but there should be logic and reasoning behind entering arrows onto the map. They should be clearly shown only if they are clear. I have no faith as a result that any of the green arrows have been thought through and that there is sound reasoning both for their positioning and size.

3/. In the south east corner the green gap covers the existing A290 road. The A290 presumably does not stop for a short distance and prevent traffic from being used on it?



4/. Why is there a green gap shown on page 51 of the DLP when it is already a gap that is not built on between Rough Common and Blean and it is outside of the C12 site boundary denoted by a red line? The site is not owned by the UoK but is included within Policy C12 which references only land owned by them. Why is it this particular area and not including the adjacent field to the west. That field which is not green gap shares borders with the houses in that location.

5/. Why is the brown arrow denoting the primary access point so short at the bottom of the map. The top of the arrow is not connecting an existing road so it should be extended until it does so. The same holds true for the other brown arrow going over the school. Additionally why is the southern most arrow there at all for section 4(d) advises it will be at the site of the junction of Whitstable Road and Rough Common Road, not the bridleway. Which is correct?

6/. The largest pink arrow purports to be an opportunity to improve cycling/walking and safety. The baseline from which we start before there can be any improvement is a tarmacked surface looking out over countryside with not a road in sight. Quite how this can be improved upon by creating initially a building site right next to it and then introducing roads and cars is unclear. Another arrow another problem with it.

7/. Why are the green spaces indicative? Indicative means that they are not final and can be moved. They are needed to provide separation and fail to do so in spectacular fashion. The one in the top right corner should cover the whole field not half of it. I live in Tyler Hill and yet a new street could appear about 40m from my boundary per the indicative open spaces. This cannot be deemed adequate separation.

Design and Layout of C12

On page 53 at 2(b) it advises, “the design and layout should be creating a complete, compact and well connected neighbourhood, where everyday needs can be met within a 15 minute walk or short cycle”. My definition of everyday need would include travel to a job, the majority of people having a need for a job. Where are the jobs that are within a 15 minute walk of this ‘compact’ site? I don’t believe they exist. I also note that office and business space (minimum 4,000 sqm) including flexible working space is to appear. I should make it clear that the inclusion of this in the draft policy does not suddenly make the site sustainable or adhere to the 15 minute requirement. I think it is highly likely to remain an empty commercial space and there is no evidence within the evidence library to support a different position.

There is also mention of housing density. Lower density development should be provided nearer to the conservation areas of Blean, Amery Court, Hothe Court, Tyler Hill and Canterbury and Whitstable Railway (Hackington & Blean) yet this is not stated as a requirement, it should be.

What constitutes higher density than 35 dph? There is no detail included in C12 as to what the density sought is and it is incomplete as a result. I note that 35 dph is already almost twice the density proposed for site R4 within the October 2022 DLP. Further the density was referred to as suburban by Andrew Thompson at the combined parish council meeting at Blean Village Hall. How is this compatible with a “rural settlement” which is referred to at 2.15 in C12.

The sheer size of the development dwarfs the existing separate villages of Tyler Hill, Blean and Rough Common. Due to its location right in the open space in the middle of them it is effectively creating an extension protruding out of the north of Canterbury.

I note the requirement for a new sewerage site within the development at 1(iv). I think if this has to happen then it should not be within a certain distance of either new or existing properties, say 100m, that would be equitable to existing residents. I am not sure why it has to be on site however. What is wrong with the proposal to have a contribution by a developer to a large sewerage plant off site where

existing infrastructure is in place and local residents are not affected? There should also be a requirement that waste is not transported onto site to be treated if it is on C12. It is unclear to me who pays for it and maintains it, that does not seem to get mentioned.

I'm also including with this section the requirement at paragraph 7 of Policy DS24 concerning publicly accessible open space. This would see potentially the Parish of Blean become liable for the cost of maintaining the open space within its boundaries. Thought should be given to how this does not become a financial burden on the parish in future years.

Geology

An extensive poorly drained and heavy London Clay formation covers our area and on top of this for much of the proposed site is Brickearth deposits. Brickearth is prone to collapse when saturated with water (likely to be the case when above London Clay) and depending on its depth does not provide a firm foundation for buildings and infrastructure.

Further the site is in a Mineral Safeguarding Area. The CCC Policies Map shows KCC River Terrace Deposits. If this is the case C12 should require a Minerals Assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations. This requirement does exist for other allocated sites within the DLP so C12 should be consistent with them. Such areas exist with the aim of protecting the underlying minerals present in the ground so that sufficient supplies are left available for future generations should they be required. The proposed development would compromise the safeguarding measures set up to protect them.

Land Use

Firstly C12 is in conflict with CCC Policy DS12 which advises that CCC will seek to protect the best and most versatile agricultural land for the longer term. The site consists of Grade 2 and 3 agricultural land which is clearly better than grade 4 and/or 5, it should be protected not built upon. Grade 2 is the UoK sites to the north of Tyler Hill Road and grade 3 to the south of it. Secondly it is contrary to the NPPF dated December 2023 which states in footnote 62 on page 52 that areas of poorer quality should be preferred to those of a higher quality.

Thirdly I am in agreement with CCC and their principles to maximise the residential development of land that has previously been developed, is derelict or underused. In the currently adopted plan of 2017 it is recognised at section 2.24 on page 47 of the plan that land, which at that time held the Council offices, may come forward.

- 2.24** In addition to the allocated housing sites, the Council has identified an opportunity site, at Chaucer Road, Canterbury which might come forward in the plan period. The land includes the current Council offices and adjacent housing. Although it is not envisaged that the Council offices will relocate in the short term, this may occur later in the plan period. The Council has considered for some time that re-modelling existing Council housing areas might provide the opportunity for better quality or more appropriate housing to meet identified local needs.
- 2.25** It is intended that the development of this site, would be primarily for housing. It is uncertain when and if development of this site will come forward and so the capacity of this site will be assessed at a later date. Consequently it has not been included in the housing land supply set out below.

The site was marketed by Avison Young, the same agent that UoK use, sold to a developer and CCC are relocating. This site should be appearing in the DLP when CCC are prioritising brown field sites and should not be held back.

Transportation

I read in Policy DS13 that as a district that we are now moving to a bus first strategy. Living in a rural village I will not be decreasing my car use as a bus is not a viable alternative, they take too long to get anywhere and are not reliable. Likewise I live too far out to cycle or walk to the various destinations I travel to. Putting car park prices up and reducing lanes available to cars will not make a difference to my car usage. Just as I will continue to use a car I expect neighbours, future new residents of C12 and indeed the district to do likewise. C12 will ruin the deliverability of this proposal and alongside the continued use of the car within the district it is completely unrealistic. It is not the case that this will see localised continued use of private vehicles, it will continue across the district.

The Sturry Road Park and Ride is a classic example of failed bus travel. There was a clear reason why it was originally suspended, it did not attract sufficient passengers.

I would expect a minimum of an additional 3,000 vehicles to be based at C12. Then on top of this there are the visitors such as delivery drivers, friends and family. The impact of these vehicles on the northern part of Canterbury and the villages of Blean, Rough Common and Tyler Hill will be monumental.

It is extremely disappointing not to see any traffic impact assessment being made available within the consultation window and is no doubt a cause for professional embarrassment within CCC. Had it been made available we would be able to comment but we are now denied this.

I note the requirement on page 55 at 4(e), the first one not the second which hasn't been reviewed correctly, to minimise traffic flow onto Tyler Hill Road in both directions. In no world does a primary and secondary access point at the southern end of the site even begin to enable this condition to be adhered with should that be remotely considered. There should be no additional traffic on the road as a result of the site and the existing ability of the road to link Blean and Tyler Hill should continue without interference. The road has a weight limit restriction on it, subsidence takes place on Calais Hill and Tyler Hill Road has two very sharp bends and is very tight in places. At the bottom of my driveway and that of St Cosmus and Lilac Cottage I have to stop and pull over significantly if another

vehicle is travelling the other way. On Bonfire Night in 2022 cars parked along one side of Tyler Hill Road right up to and including along this section. As a result it was not possible to get traffic moving along the road at all, not ideal when emergency services try to use it.

The impact on Rough Common Road will be hugely detrimental to anyone living near it. Again a weight restriction is in place on this road. The improvements to it would turn this road into a bypass in all but name. There are on street parking spaces on the road as there is a need for them. If they are removed the need does not go away. I am told the parking spaces need to be removed as there will be a need to keep traffic flowing as otherwise it would back up but at the same time drivers who park at their houses on roads off of Rough Common Road will need to be able to pull out safely onto it and people will need to cross it safely. The air quality on the road and its vicinity would deteriorate considerably and it passes both residential houses and the village hall which plays host to Rough Common Pre-school. I would not wish for my child to be playing out the back of it when it turns into a busy road, there will be health consequences. Likewise noise levels would rise considerably and I would feel very sorry for anyone living along it having to listen to a constant sound of traffic. I do not think the road improvements and the increase in traffic to pass along it (including all the large construction vehicles) would be compatible with NPPF December 2023 paragraph 191 (a).

The district wide promotion of walking and cycling will not be achievable here. Walking along Rough Common Road will decrease as will walking along the bridleway opposite Kent College. Who would want to walk along a busy road if they can avoid it. Walking into the city centre is not viable, it is too far especially when one of the journeys will be uphill. Cycling for the same reason is not viable and will push people into cars. Not only would Rough Common Road and Tyler Hill Road be affected but also the A290 running north south into Canterbury and Whitstable. A road which had suffered fatalities.

Cycling on flat terrain is easier than hills. Tyler Hill as the name suggests has a steep hill to tackle if cycling to it indeed the city of canterbury is downhill of the C12 site so cycling will only be physically possible for a minority of the population.

Straying away from C12 briefly I am in support of the platforms at Canterbury West being extended such that every carriage of a train can access it. However my understanding is that this is not under the remit or control of CCC. If this is not an important point however I would also like to see the high speed trains run on high speed lines between Ashford and Canterbury.

Surface Drainage and flooding

The field next to myself becomes very wet during winter months and slowly drains into the Sarre Penn via a drainage ditch on my land running alongside my driveway. At the same time the old railway line running north south on my land is cut into the ground so the field in the north eastern corner of the site, immediately to the west of the line, is on higher ground. I should make clear that in the future if any additional erosion, damage or increased volume of water arises or is caused to appear on my land as a result of C12 and an increase in surface water run off I will have no hesitation in exploring legal action that I can take. The flooding would be to a Conservation Area.

The reason it becomes so wet is because the site is on London Clay and there is a very high water table, the site also has a river running through it. Policy DS20 contains within the introduction to the line at Sectio 6.61 "Undeveloped land within areas of flood risk should not normally be

developed". The site is predominantly greenfield and meets the definition of undeveloped land. The Strategic Flood Risk Assessment 2024 carried out by Herrington Consulting notes on page 45 that, "Where property is located in close proximity to the Sarre Penn there may be a risk of flooding". It also states that there are localised drainage problems associated with the watercourse particularly in north Canterbury and where road culverts restrict flow. This area as a result should not be built upon. The proposal to deal with the remaining site challenges is the reason for section 3(a) on page 54 which requires SUDS across the entire site. This requirement is unrealistic and not deliverable due to the scale of the site. As a result I believe in accordance with DS20(1) the proposal would be refused. It is not practical to have SUDS across the entire site, particularly near the community hub, high density housing, school and commercial premises. The flow rate into the Sarre Penn which results from this particular area must be higher than the actual base line now and would increase the risk of flooding.

Where water flow does flow more than quickly than it does currently into the Sarre Penn there is a significant risk that the water environment will deteriorate. Policy DS17 requires a minimum of 50% of P and N removal from surface water so the remaining 50% can go into the Sarre Penn. I cannot see how any mitigation measures would be sufficient to return it to an acceptable standard.

The current rating of positive for flooding within the Sustainability Appraisal Of The Strategic Land Availability Assessment dated December 2023 is wrong.

The first two photos below are of near to the Sarre Penn in the valley and show water flowing down the fields to the river. The ducks in the second photo cannot be made out clearly unfortunately given my distance from them when taking the photo. They are followed by a photo of flat land near to the two sharp bends on Tyler Hill Road which would be close to the community hub and the high density housing and a flooded Tyler Hill Road.





Heritage and DS26 – Historic Environment and archaeology

C12 will be directly adjacent to Tyler Hill Conservation Area, Amery Court (Blean) Conservation Area, Canterbury and Whitstable Railway (Blean and Hackington) Conservation Area and will be within both the Hothe Court Conservation Area and Blean Conservation Area.

DS26 section 5 in the DLP states the below:

“Proposals for development within a conservation area should preserve or enhance its special architectural or historic character or appearance and its setting. All new development and alterations in Conservation Areas should:

- (a) Respect the plan form, architectural features, materials, height, massing, building lines, roofscapes, scale, relationships between buildings and the spaces between them of the Area;
- (b) Retain trees, open spaces, walls, fences and other features where they contribute positively to the character and appearance of the Area;
- (c) Be appropriate in land use to the character, appearance and historic function of the area;
- (d) Not generate levels of traffic, parking or other environmental problems which would result in unacceptable harm to the character, appearance or significance of the Area; and
- (e) Not prejudice important views into or out of the Area”.

I believe that the majority of these conditions would not be complied with when proposing to make the primary access route through the narrow conservation area of Hothe Court Farm. The Area does not appear to have a formal appraisal of it carried out in the recent past but from viewing the original Planning Committee report from 23 September 1994 when it was proposed and approved the Area is noted for, “many mature trees and some fine hedgerows particularly along the Salt Road”. “The playing fields west of the Salt Road are surrounded by trees and hedgerows and form part of the setting...”. “an important back drop to the open area in front of Blean House”. All of these positive

characteristics and attributes would be affected and potentially lost by a new road going through the site and the repositioning of Blean Primary School.

Further to the east of the site in the north east corner it borders the narrow Canterbury and Whitstable Railway (Blean and Hackington) Conservation Area. This Area does have an appraisal which was last revised in December 2009. It sets out the quite considerable heritage of the rail route between Canterbury and Whitstable which warranted consideration as to whether it should be included as a world heritage site (ultimately not taken forward in 1997). On page 8 it advises that the railway line is therefore an extremely important part of the history of railways in the United Kingdom. What should be happening is that the boundary of the site is extended to the west and this is given consideration under section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It's defining characteristics are noted as "between is a stretch of attractive, mainly wooded countryside, rich in wildlife and plants", "Tyler Hill itself forms an important landmark in the countryside", "attractive and undulating countryside with several notable features" and "flattish open fields towards Tyler Hill village". On page 19 it advises the character of the area is rural. The indicative open space attached to the adjacent site is roughly 40m wide and then there would be new build housing. This would destroy the rural character of the area and be incompatible with page 20 where it states, "Views across rather low-lying fields to the line of trees which mark the railway line are important". I do not think that there should be any development in fields adjacent to the western boundary of this Conservation Area. C12 would cause irreparable damage and harm to this environment.

Government planning guidance stresses that our built and natural heritage should be valued and protected as a central part of our cultural heritage and that everyone shares the responsibility for environmental stewardship.

UoK agree that there planning constraints associated with development in and around the Conservation Areas within their Estates Strategy document dated June 2009. Below is a snip of the relevant part of that document. Note it states, Conservation area status will act as a constraint on future development". Nothing has changed since 2009 in this regard yet now they propose a primary access point through one and that they will build adjacent to anothers.

ESTATES STRATEGY 2009

wishing to expand beyond the capacity of the business innovation park and locate within the District.

The Local Plan Proposals Map provides further guidance for the University. A number of sites are identified for future development at the University – in total this amounts to 7 hectares of land. Most existing buildings on the campus are classed as educational; land at Beverley Farm is shown as being safeguarded for the business innovation park. Significant parts of the rest of the site are classed as 'Areas of High Landscape Value'. Here, development proposals which would cause unacceptable harm to the local landscape and/or historic setting will not be permitted. The western part of the campus lies within a conservation area. Another conservation area adjoins the eastern boundary of the campus. Conservation area status will act as a constraint on future development. The Local Plan also has a 'Green Gap' policy where development is restricted. This applies to the extreme western part of the campus and to an area partly to the north of the campus. A proposal for a cycle and pedestrian route across the campus also forms part of the Plan.

The site contains a schedule monument adjacent to the southwest of the Grade II* listed Church of St Cosmus and St Damian in the Blean. Close by the east of it is a Grade II listed building and within the Hothe Court Conservation Area are Hothe Court, the Long Barn and near by Blean House.

Pollution

In the NPPF dated December 2023 it states at paragraph 191 on page 55 the following.

191. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life⁶⁹;
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
 - c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

There is no mention in C12 of how light pollution and the impact of it on the area would be limited. As such I do not consider C12 compatible with the NPPF requirement at paragraph 191(c). It is unclear how light pollution can be limited when it is currently a site that does not contain a built environment and is proposed to hold 2,000 houses.

Biodiversity

The site contains ancient woodland, see below the map from DEFRA. This source is irrefutable. It is already agreed by UoK in their Woodland Management Strategy document of 2016 that there is Ancient Woodland (West Triangle Wood and Long Thin Wood). Any proposals which would result in the loss, or damage to, or threaten the future retention of, irreplaceable habitat such as this should be refused. It is not clear how the site would achieve its goals without doing this as the road network must run north south through these sites. The ancient woodland at West Triangle Wood and the Long Thin Wood are referenced within UoK's Estates, Landscape and Biodiversity Strategy 2018-2021 where it notes that they are unique and irreplaceable habitat covering less than 2% of the UK land area and that they are afforded special protection in planning law.

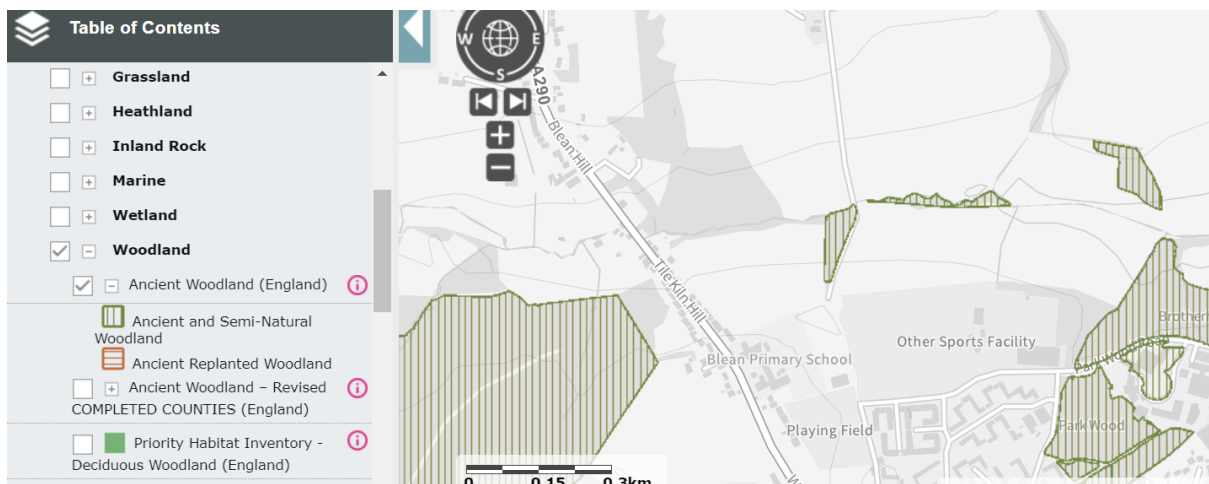
At paragraph 186(c) of the NPPF December 2023 publication it advises that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless there are wholly exceptional reasons **and** a suitable compensation strategy exists. CCC Policy DS18 reflects this.

There are not wholly exception reasons where the need for, and public benefits of, the development in that location clearly outweigh the loss. The NPPF of December 2023 at footnote 67 on page 54 provides the example of nationally significant infrastructure projects, that is not the case here. It is therefore not necessary to consider the further requirement of adequate compensation. This is another extremely strong reason why C12 should not proceed and why further consideration should be given to other sites in the district.

I am at a loss to explain why in the Natural Environment and Open Space Topic Paper (2024) at paragraph 6.14 on page 51 that it is even remotely acceptable to consider writing that Long Thin Wood has the potential to be impacted by the provision of primary access to the site. It is utterly scandalous that because this is a key strategic location within the site that UoK are now trying to argue that it is not Ancient Woodland, having stated that it was!

Further UoK have had the joy of working on this for a considerable amount of time and yet as consultees we are faced with wading through numerous lengthy documents in a limited period of time. I can see no sign of the key assessment suggesting it is not ancient woodland online. Where is it? Why is evidence not available for scrutiny? How ironic that maps are continually referred to as conceptual by CCC and UoK to cover an a litany of errors but the minute they support UoK they are suddenly deemed accurate and factual!

6.20 should not be considering mitigation and compensation. It is very simple the development should not proceed if the woodland is negatively impacted in any way.



The field in the north eastern corner is adjacent to the Tyler Hill Pasture, a Local Wildlife Site (“LWS”). In the bottom left corner of the site exists Blean Pasture, another LWS. They are locally designated sites due to their importance for biodiversity. Locating C12 in such close proximity to them would have an adverse effect. DS19 recognises the importance of these sites. There should be no development taking place near to these locations. Below is a screenshot showing these LWS sites.



As well as C12 recognising The Blean Woodland Complex it should also in my opinion recognise the close proximity to the Sites of Special Scientific Interest (“SSSI”) that exist. These are referenced in DS18 at paragraph 4. This is another reason why no development should take place on the fields to the north of Tyler Hill road on the eastern side of the site. They are in close proximity to SSSI sites. Just as there should be development within 400m of the Blean Woods SAC there should equally be none within 400m of the SSSI located in Tyler Hill.



It is noted that in paragraph 6.74 of the DLP that areas of land surrounding the Complex provide opportunities to restore connectivity and enhance the integrity of the Complex. C12 flies in the face of this vision.

I am in favour of CCC increasing the biodiversity net gain from 10% which is a national requirement to 20%. My concern however is that habitat characteristics which are determining which species currently use it are being lost if C12 proceeds. In this case the obvious example is fields which are used by skylarks. It cannot be the case that putting up bird boxes for blue tits is considered a gain or improvement on the site. Where the habitat lost cannot be replaced then the development should not proceed for if it does it risks the likelihood of species loss.

Canterbury Landscape Character Assessment and Biodiversity Appraisal – final report dated October 2020

Unfortunately C12 pays no regard to this document or Policy DS22 and is seemingly in complete conflict with them. At paragraph 1.11 of the appraisal it states, “understanding the character of place and evaluating an area’s defining characteristics is a key component in managing growth sustainably and ensuring that the inherent qualities of Canterbury District landscape can continue to be appreciated”. I am in agreement with this.

Page 164 notes the key characteristics of Amery Court Farmland, the area in which C12 is located, as having strong rural character in close proximity to Canterbury City containing landscape with views limited by woodland and topography. If the development goes ahead it will be the built environment limiting views and as such the characteristics of the area will be eroded and fail to exist.

Page 167 contains landscape and development management for Amery Court Farmland which are in conflict with Policy C12. For example, “Manage and enhance the arable fields by encouraging the creation of uncultivated field margins and other wildlife friendly farming methods.” There will be no arable fields remaining if C12 happens.

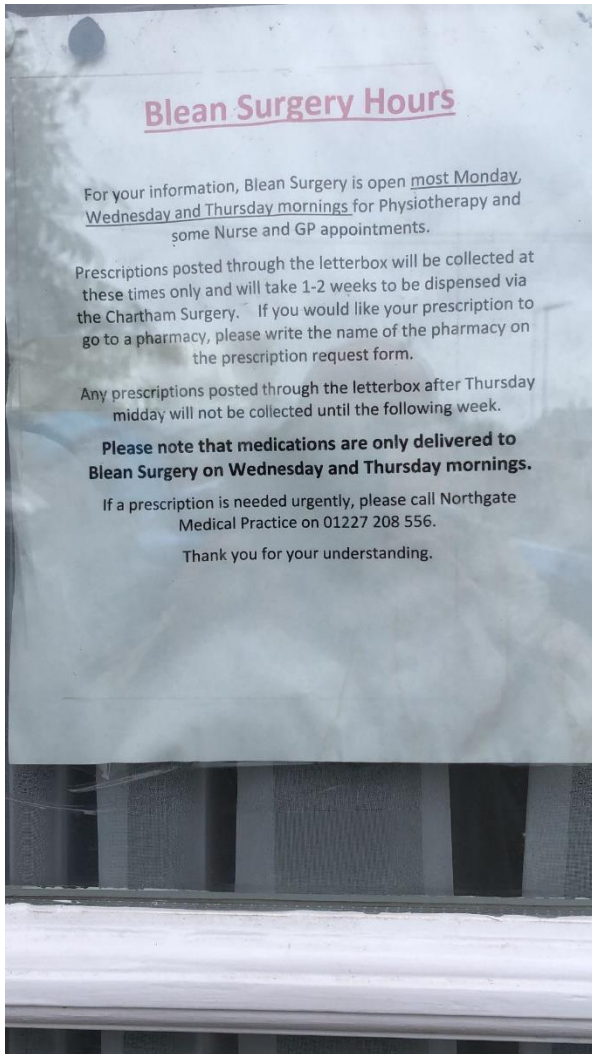
Page 180 focusing on the area named Stour Valley Slopes has within the Development Management section at the last point ‘Avoid extension of development on and beyond the ridgeline into the more rural Blean landscape to the north’.

There are countless other conflicts which can be read. As C12 is not complying with DS22 it should not proceed.

Local Services

In the 2023 Rural Settlement Review the village of Blean, in whose parish the new settlement is proposed, is awarded 21 points in determining the settlement classification and has five key services. Please note however that I do not believe the 3 points awarded for a GP surgery are appropriate. The GP surgery being referred to is a satellite site for Northgate Medical Practice and is not fully operational. I have inserted below the notice that is attached to their front door showing that it is open most (i.e. not all) Monday, Wednesday and Thursday mornings. When it is open for those three mornings in a week it is for physiotherapy and some Nurse and GP appointments. This would mean it actually has four key services and results in a classification not of a Rural Service Centre but instead a Local Service Centre. The definition of a Local Service Centre advises that, “residents living there will need to travel outside of the settlement to access the full range of key services. The level of services within a Local Service Centre may mean that residents living in other settlements nearby use it for important services”.

As a result the position regards traffic might well be understated by CCC and the number of private vehicle journeys required are actually higher. Further minor amendments are also needed within the review to remove the churches shown in Rough Common and Tyler Hill both of which are no longer operational.



The primary access road will run past Blean Primary School. This will result in pollution and disturbance to children in terms of noise and air quality.

A new replacement primary school will be built near to the existing school. This will again mean noise, pollution and disturbance when children are trying to learn and concentrate. When they play outside they will be playing in the vicinity of a building site.

When the new site is finished, which will not be a quick event, children will be transitioned over into a new environment which they are unfamiliar with. They will then go through a further period of disruption when their old school is demolished and again they find themselves trying to concentrate and play while they suffer noise and pollution.

I have a [REDACTED] at Blean Primary School and a [REDACTED] who we had expected to follow him there. I am extremely concerned about the disruption to their education that could result from this proposal. I find it staggering that there is not a single reference to an educational impact assessment within C12 and one has not been carried out. I am now questioning whether it is a wise decision to send children to that school if their education at a crucial age could be impacted and am actively investigating alternatives. This is far from ideal given it is the only state school in the area to be Outstanding after an Ofsted inspection.

One thing for sure however is that I would not recommend to any parent that they send their children to the new 3 form entry primary school located near a community hub as a first choice. That school will clearly start from a lower position when compared to an existing Outstanding school and will have a lower reputation as a result. This has potential to be divisive within the community. I should add that the solution is not to create a replacement mega school.

Exceptional circumstances

The latest available population figures for the Canterbury district which were released on 26 March 2024 by the Office for National Statistics show that the estimated population mid 2022 was 157,500. In the mid 2022 dataset spreadsheet it is within tab 'MYE2 - Persons' at row 278.

When the housing targets out until 2040 were set they were done so off of projections to populations starting from a 2014 baseline. This baseline had a population for the Canterbury district of 158,000. Canterbury can therefore be said to have a declining population and this is sufficient reason to push back on housing targets that have been set for us as a district.

Unfortunately, and it is with considerable regret, that I am completely lacking any reassurance that CCC have considered this in sufficient detail, it at all any. I suspect that instead of spending any money or resource or time on the matter they adopted an approach of waiting to see whether government planning policy would be amended such that additional housing was instead pushed further north in the country and not in the south east. Peter Davies at Blean Village Hall on 30 April 2024 at a meeting between CCC and the parishes of Blean, Tyler Hill and Rough Common advised CCC had pinned a lot on this happening but it did not materialise.

When I asked Andrew Thompson at the same meeting the question on whether Edge Analytics had considered exceptional circumstance I was told yes. I have searched for the word 'exceptional' in both the original report dated September 2021 and the update in February 2024 but cannot find it mentioned. Peter Davies then started talking about how the student population counts towards the target. This is great and indeed helpful but it is not the same as exceptional circumstance which would be seeking to reduce the overall target, not keep it the same. There does not appear to be any professional experience within the team around this subject and CCC should be supporting them with sufficient resources to enable them to carry out their jobs to the best of their ability on behalf of the residents in the district.

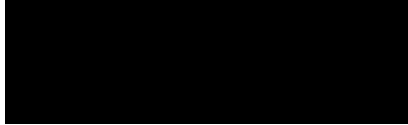
I continue to believe that a declining population in the district is grounds for an exceptional circumstance.

Summary

Policy C12 has to be removed from the DLP on the basis that is not viable, feasible or workable and is in conflict with both local policies of CCC and national planning policy. It is an absolutely disgusting proposal. My view of UoK has been changed forever and I now know what CCC are like, this policy should be no where near the draft approved for consultation. Further the housing target for the district is too high and the Council should take action to address this rather than pandering to it.

Finally what is being done to improve mobile phone signal and roll out of super fast broadband to existing properties within the district? C12 is a mobile phone signal blackspot just like Tyler Hill.

Yours faithfully

A large black rectangular redaction box covering the signature of Robert Wildman.

Robert Wildman

A long black rectangular redaction box covering contact information, likely a phone number or email address.