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Ref: Chapter 2 (Canterbury), Policy C12

To whom it may concern,

I would like to object to:

- A new 'rural settlement' on a site of over 100 hectares removing precious land and ancient woodland
- 2,000 new dwellings
- A community hub with shops, offices, business space and a mobility hub
- Waste water treatment works
- Relocation of Blean Primary School and another new Primary School built
- Only two access points, both on Whitstable Road – one opposite Kent College and one through the current Blean Primary School site

Ancient Woodland

The Blean Woods are ancient woodland, and there are specific areas within this development that have clearly been identified as ancient woodland. These are green field rural areas, not brown field, and the size and scale of the proposed development will have a detrimental effect on the entire area. Protecting the Sarre Penn stream and its valley is very important, however, Site C12 contradicts policy SS1 (10): "The council will continue to work with partners to... support the extension and improved connectivity of the Blean Woodland Complex." This development would cut across the Blean Woodland Complex making connectivity impossible.

In relation to the impact on ancient woodland, we read in the [Natural Environment and Open Space Topic Paper Feb 2024](#) that: "Based on ancient woodland mapping information provided by Natural England, the proposed new settlement at Land north of the University of Kent (Policy C12) includes two small parcels of ancient woodland." These two parcels are identified in the University of Kent's [Woodland Management Strategy](#) as West Triangle Wood (W10b) and Long Thin Wood (W8b), and they noted as remnants of ancient woodland of "high quality ecological resource." Importantly, they are identified in the [Natural England Open Data Geoportals](#) as "Ancient & Semi-Natural Woodland."

The Topic Paper continues: "The western parcel will be retained, as demonstrated in the draft policy concept masterplan so it is not expected that the western parcel will lose or suffer deterioration of ancient woodland or ancient or veteran trees." This is certainly not demonstrated in the concept masterplan! No road is indicated. Therefore, this statement is factually untrue and is indicative of the level of misrepresentation and inaccuracy of the whole of Policy C12.

It is also not credible. Ancient woodlands are unique and precious environments whose networks extend far beyond the tree boundaries. New roads passing adjacent to ancient woodlands severely impact their health and integrity, severing the connectivity between one woodland parcel and another. To cite the [Woodland Trust's written evidence to Parliament](#) (Feb 2023): "In our experience, too often the creation of new roads and the widening of existing roads leads to further fragmentation, loss and deterioration of wildlife habitat, including irreplaceable habitats such as ancient woodland and veteran trees." If a new road crosses the Sarre Penn valley from near the Oaks Day Nursery into the fields beneath St Damian & St Cosmus, it will run alongside the West Triangle Wood. The government guidance on [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions](#) recommends that "For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic."

Therefore, unless the new road passes through the grass sports pitches of the University and down through the centre of the field between the Sarre Penn and the sports pitches (which we do not know as the concept masterplan does not show), it will not accord with government guidelines. Even then, the woodland would still suffer deterioration owing to the nearby presence of a road, the construction disturbance and the new housing development. Once again, the assurance in the Topic Paper is inaccurate and misleading.

Across the nation there is a concerted effort to protect ancient woodland and to ensure that the classification is robust and meaningful. It is infuriating to think that the University of Kent, the home of the Durrell Institute of Conservation & Ecology, is strategically seeking to question classification so as to push forward with this damaging development proposal.

It is equally worrying that Canterbury City Council, in contradiction to its Declaration of Biodiversity Emergency, would blithely hope that "any impacts on the woodland must be minimised. If deemed necessary, the council would also expect adequate mitigation and compensation measures and an implementation plan, in line with the policy requirements."

If this were not bad enough, the Topic Paper adds that "If necessary, there is clear potential for a suitable compensation strategy to be devised that mitigates the loss of the ancient woodland."

Loss? Ancient woodland, as defined by [government regulation](#), "takes hundreds of years to establish and is defined as an irreplaceable habitat." It cannot be replaced. It is irreplaceable. There is nothing misleading about that. It is enshrined in countless instruments of legislation. No "compensation strategy" can substitute the loss of ancient woodland. We cannot afford to lose more ancient woodland. The woodland deserves all the protection it can get, not downgraded classification, minimisation, mitigation and compensation.

Furthermore, both parcels of woodland are identified on the [Canterbury City Council TPO map](#) with Tree Preservation Orders. As the [national legislation](#) indicates, “A Tree Preservation Order is an order made by a local planning authority in England to protect specific trees, groups of trees or woodlands in the interests of amenity.”

No organisation, whether a university or a local authority, should be actively seeking to downgrade the classification of an ancient woodland and to lessen its ecological value so as to downplay the ecological harms of a proposed policy. What was the point in declaring a Biodiversity Emergency if this is the direction of travel?

On this basis alone, Policy C12 should be withdrawn from the Local Plan.

Blean primary School

Blean primary school is a thriving and outstanding school. Living with a family member who has previously worked there we know how precious the school field and woodland areas are for the children and the curriculum. Many schools do not have such precious outdoor space and we know how fundamental green space is for children’s wellbeing and mental health. To take this away from them and to uproot them seems especially cruel and unkind in the state the world is currently in. Parents and children are extremely worried about the impact of climate change on future generations and what is this teaching them? That money and power win over nature.

Many parents and teachers have serious concerns about how demolishing and moving Blean Primary would impact staff and pupils, and what effect two schools in close proximity would have on education in the area. It is unclear how resources, teachers and pupils would be allocated between the two schools, and parents have raised questions over whether the two would end up competing with each other, or if they would be turned into an Academy Trust to be run jointly.

There have been very few assurances from the Council about how any of this would work in practice, and it is bound to create enormous disruption to Blean Primary School. Parents and staff have great concerns about being located next to a building site for up to 10 years, and what impact this would have on health, safety and wellbeing at the school

Questions from parents to the Head and Chair of Governors have been met with very little information, and they say Kent County Council have not consulted with them. There has been no Education Impact Assessment and no evaluation of the risks and challenges posed by such a complex proposal – to move a working school to a new site on a huge building site.

Transport

Current road traffic is heavy, and such development will only increase it. The buses are currently cut in service and unreliable. Policy C12 does not comply with SS4 (1.49), which says: “focusing growth at the urban areas, and at Canterbury in particular, presents the greatest opportunities to plan for a switch to sustainable transport.” Site C12 is called a

“rural settlement”, is outside the urban envelope of the city, and is described as a “large-scale car-dependent development” in the SLAA.

It has also been pointed out that the adopted Local Plan 2017, policy EMP7, requires that significant development proposals at the University be subject to updating of the University’s Transport Impact Assessment and a review of the University Travel Plan. Neither of these has been produced in relation to site C12. Walking and cycling may well be prioritised, but with this amount of development most properties will own at least one car. Site C12 has many issues due to the number of cars it would add to the unsuitable local road network. The council says this can all be solved by the Bus-First Strategy and everyone switching from cars to buses, however it is not easy to get people out of their cars - especially if they consider they are moving ‘out of town’.

C12 does not satisfy policy DS19 of the Local Plan, as C12 would create one continuous urban sprawl between Rough Common, Blean and Tyler Hill with no real separation of three distinct villages. The open space and landscape buffers shown are not sufficient to mitigate the impact on the villages.

Sewage

Living downstream in Whitstable where we already have huge flooding risk and a disgusting amount of sewage being pumped into our waters, the increased development without infrastructure will cause additional problems, of the scale of Stodmarsh, where Natural England has had to call for a pause to house-building to stop irreversible damage to the Stodmarsh River and National Nature Reserve, caused by nitrates from non-organic farming and human sewage – is also still a major concern and needs to be managed at the District level.

Biodiversity Recovery

This policy says “Improving biodiversity across the district is a clear priority of this plan” but in the same breath says “Although the district benefits from the **biodiversity hotspots including The Blean**, the Kent Downs, The River Great Stour and the coast, biodiversity across these sites and neighbouring countryside and urban areas **continues to decline.**” The Blean is identified in the Local Plan DS21 as a biodiversity hotspot; is an identified ‘Biodiversity Opportunity Area’ BoA in the Kent Wildlife Strategy; and is a priority Area of Particular Importance for Biodiversity in the Local Nature Recovery Strategy. Site C12 contradicts all of these policies.

I urge you to take the local population and major environmental figures views, such as Chris Packham into consideration. Please do not be responsible for destroying this special land.

Yours sincerely,

Siobhan Reddin-Tasker

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