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Resident since 2017

Consultation Submission in response to Canterbury District Local Plan 2040:

### **I strongly object to Policy C12 Land north of the University of Kent**

The proposal to build c2000 houses on Land north of the University of Kent **is not sustainable or deliverable** on a number of points:

- 1 Transport – there is to date no transport assessment, and the strategy set out in the draft local plan is in direct conflict with the transport strategy cited in the proposal.
- 2 Access to the site – impacting on an ‘outstanding’ primary school and a bridleway leading to a heritage site – the Crab and Winkle Way.
- 3 Impact on the local community, wellbeing and loss of three distinct and age-old villages amalgamated by a ‘new town’ C12
- 4 Rural landscape and heritage would be destroyed by the development
- 5 Biodiversity and the ability to maintain connectivity across the Blean Wood Complex would be irretrievably lost.
- 6 Agricultural land would be lost when the world has a huge concern about food shortages and security.
- 7 Infrastructure – lack of clear planning on how waste water will be treated, flooding including surface runoff, GP and hospital capacity
- 8 Consultation – lack of adequate time, poor communication and insufficient information upon which to make informed decisions.

#### **Access and transportation:**

##### **Ref Policy C12 (4)**

Without a clear Transport Assessment, (C12 4,h) it is impossible to understand how the transport strategy for the site was achieved. Whilst a bus-led policy is to be commended, the addition of 2000 houses will inevitably mean that this development will be car dependent. In the previous Sustainability Appraisal of the SLAA (Dec 23 ) pg 178 a site the size of C12 was rejected, being deemed as having ‘ significant negative effects on transport highways (large-scale car dependent development)’and in addition ‘significant negative effects on Biodiversity, Geology, Landscape, Water and Historic environment and Land use’.

The bus service at Tyler Hill is infrequent, and without any night-time buses at all. Stagecoach at this stage have given no indication how extra buses would be provided, having just slashed the timetable in other areas of Canterbury.

There is no evidence to say what has changed, except for the a new ‘primary’ access point, (C12 4, d) involving the removal (and relocation?) of an ‘outstanding’ primary school. When this access is only approximately 400m away from the ‘secondary’ access point, how is this deemed ‘primary’, it will involve the same stretch of Whitstable Road, with all the negative impacts of the increased traffic, feeding into the same road. It will mean compromising the Green Gap and

2.

loss of many mature trees, impacting the Crab and Winkle Way, a PRoW, that runs north from Whitstable Road and endangering heritage-listed buildings in the area.

**Rough Common Road** has already been cited as the main road to be used by construction traffic. This has huge negative consequences for the Village of RC. This will lead to : lack of parking, endangering pedestrians, especially children that use the Road to walk to Blean Primary school (there are no buses from Rough Common). It will negatively impact the Blean Woodland Complex, with increased, air, noise and light pollution.

The Blean Woodland Complex was deemed in the **Landscape Character and Biodiversity Appraisal 2020** a 'Biodiversity Opportunity Area (BOA)'. Action was recommended in this to 'maintain, restore enhance and create woodland and grassland habitat network of the Blean BOA. 'Maintain the existing narrow single line of development associated with Blean and Tyler Hill villages, avoiding backland encroaching towards the woods and maintaining views through gaps in development to the woodland edge'.

Policy C12 is in direct contravention of this, **and it should be removed from the draft local plan.**

With reference to C12 .4 (e). I have seen no evidence that the site would be able to 'minimise traffic flow onto **Tyler Hill Road** in both directions'.

C12 is situated on both sides of the Tyler Hill Road (THR) and as such it seems inevitable that an access for this development (that could potentially 'house' more than 2000 cars), will have to be onto this narrow, winding road. At many points, THR is impassable for two cars. A weight-limited road, a 60 mph speed limit and NO footpath. With houses encroaching from either side, there is no possibility of widening and 'T' junctions at both ends leading onto busy roads. The first at Canterbury Hill, backs up already with traffic morning and evening, width restricted to 6m and blighted by surface-water run-off and potholes. The second at Blean Common A290, where they have been numerous traffic incidents in the past few years.

C12 4 (a) (i) 'Improved walking and cycle connections to the city centre via the Crab and Winkle cycle route and PRoWs through the UoK estate' . The bridleway (the start of the Crab and Winkle Way) that runs north from Whitstable Road, through THR and onwards, is enjoyed due to the reasons that it is encased in green, historic and archaeologically significant areas. It is a quiet, traffic-free pathway and I use this cycle route frequently. The health and mental wellbeing benefits to myself and others are derived from these facts, which will be **wholly lost should C12** be realised. **Canterbury Park Run (CPR)** will no longer be able to use this area, including the C&W, with up to 200 or more runners joining the CPR each Saturday. In excess of 8000 runners and walkers have benefitted from the mental and physical health, as well as the social side, that this activity provides. Yesterday it hosted runners from France, Peterborough, Manchester. Every week we see visitors from all over the country. They always comment on how lucky we are to run through such a beautiful area and in particular our Blean Church, at the top of the run. **CPR is in its 10<sup>th</sup> year!**

3.



Cycling on the Crab and Winkle way, stopping by the St Cosmus and St Damian Church in the Blean.

### Local Community Impact

Blean (pop 1,500) Tyler Hill (pop 590) and Rough Common (pop 2300) are three distinct villages, The new 'rural settlement' of 2000 houses, with a potential population in excess of 5000, will destroy the separation and identity of these three villages. C12 will be a 'new town' and its proximity to the existing villages will also destroy the green gap that currently exists between them. Policy C12 (3g) states 'Minimise and where necessary mitigate damage to the Blean and Rough Common Green Gap through the provision of the primary access'. This wording in itself already reveals that significant damage will be caused by the placing of the primary transport access - and this contravenes **Policy R19 p 152** to 'resist development which affects the openness of designated green gaps'. C12, if approved, would mean that the Land north of the University of Kent, would become part of the Canterbury urban sprawl and completely change the character of the villages. **Policy C12 should be removed from the Local Plan.**

### Rural Landscape and Heritage

Policy C12 – **page 52** depicts a map that purports to show where Open space and biodiversity opportunities will be located. The Land north of the University is already **open space and biodiverse**. It connects the Blean Woodland in Rough Common, east to Tyler Hill and a conservation area, that extends to Thornden Wood, and the **Wilder Blean Project**. An innovative project introducing European Bison into the area, which is recognised world-wide. A 'new settlement' of 2000 houses will completely negate this connectivity and ruin the future potential to reunite this.

There is a long green arrow on the right hand side of the map as an 'opportunity for a green corridor' – this arrow is **outside the boundary of the C12 site!** Whilst residents are told that this map is only 'illustrative' (by CCC Councillors at the Consultation Meetings of the 23/4/24 29/4/24 and 21/5/24), this map is what the residents of Canterbury have to refer to when making

4.

their responses, how is this a fair indication of what the C12 Site can be expected to look like and how then can residents respond with any degree of knowledge.

### **Heritage**

Visitors to Canterbury do not only go to the Cathedral, they come to St Cosmus and St Damian in the Blean. The site of the present church purports to date back to 598, when monks from Rome set up a shrine to St Cosmos and Damian here on the ancient Salt Road, known now as the Crab and Winkle Way. There are only 4 churches in Britain with the same name. Visitors are captivated by its history and the fact that it was mentioned in the doomsday book of 1086. The present flintstone church, with Kent peg tiles, built in its current form, in 1233, has changed little since then. It is a significant part of the history of the **whole of Canterbury**, not just Blean.

The Roman villa to the West of the church and the bronze age findings to the East of the church, make it hugely historically valuable, and a tourist highlight. Policy C12 houses and the central hub of the 'new settlement' built in such close proximity to the church will destroy the potential for more archaeological digs (which will impact the University Students too).

**How will the structure of the church be affected by the building works? The potential for ground flooding, due to surface water run-off from acres of concrete on the nearby site? Tourism will suffer and the quiet and peace offered by the church, in its current surroundings will cease to exist.**

The document Vision for 2040 talks about 'our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life'. Compromising and destroying part of that heritage and culture with Policy C12 is in direct contradiction to the Vision.

**Therefore Policy C12 should be removed from the Local Plan.**

### **Biodiversity**

I have already talked about the Connectivity above.

Policy C12 states 3b 'Provide a 20% biodiversity net gain, in line with Policy DS21'. The area of Land north of the University is already renowned for its bird species. Skylark (on the red list of endangered animals), tawny owl, yellowhammer, swallows and soon, swifts. Whitethroat and even barn owls have been seen flying low over the fields. I regularly take my binoculars on a walk through the fields to the Church and meet other residents and visitors appreciating the sights and sounds of nature.

Biodiversity net gain is laudable, and this is an opportunity **not to build over fields and natural woodland, some of which running along the C12 Site is Ancient Woodland** (in existence since 1600), **but to enhance it.**

5.

**Nightingale Survey: May 2023: See Appendix at the end ‘Nightingale Survey’**

We took part in a Kent Ornithological Society, Nightingale Survey in May 2023. Not only did we record males singing in Clowes Wood, less than a mile from the C12 site, but **Nightingales were recorded in the C12 site area: OS Grid references TR129608, TR129603, TR 126603.**

**TR129603 abuts the designated area ‘Long Thin Wood’ (W8b) and TR126603 is sited in ‘West Triangle Wood’ (W10b)** both identified in the University of Kent’s *Woodland Management Strategy* as ‘remnants of ancient woodland of high quality ecological resource’. Importantly they are identified in the *Natural England Open Data Geoportal* as ‘Ancient and Semi-Natural Woodland’.

The proximity of houses, or even re-purposed ‘green space’ would be of significant disturbance to Nightingales as to cause them to abandon these areas. Nightingales are on the Red-list of endangered species, and there are few areas in the country left where they return to each spring to breed.

**Air quality/light pollution :**

The presence of c2000 houses in this area, with resultant light pollution would severely affect bird migration, insect activity and other animals, particularly nocturnal. Air pollution in addition from the c3000 plus cars will be blown from the hilly area over the woods, Blean, Clowes and Thornden Wood areas. This cannot be mitigated.

**Landscape character.**

**Canterbury City Councils own document, the ‘Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020’ (exerts below) refer to the area of C12 and must be adhered to:**

**Ref: C6 Canterbury Landscape Character Profiles- E 3, Amery Court Farmland -Pages 162-167 – specifically encompassing C12, Land north of the University of Kent.**

Guidance Landscape Guidelines and Key Habitat Opportunities: Quote:

‘Landscape 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

6.

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. √ Conserve and enhance historic field patterns and features including the earthworks at St Cosmus and Damian church (Scheduled Monument) and other isolated boundaries and features representing the Medieval landscape pattern including the drove roads, saltways and meadows and hedgerows. Development Management √ Conserve the local distinctiveness of historic buildings and their rural setting, particularly within the Amery Court, Blean and Tyler Hill Conservation Areas. Traditional local building materials are red stock brick and clay tiles although a modern 20th century vernacular predominates. √ 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 and enhance the integration of urban edges, through native wooded boundaries and mature trees to provide visual screening and reduce the impact of built development and integrate settlements within their wooded setting. √ 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. √ Seek to avoid high rise and tall development/infrastructure on the crest of the Stour Valley slopes to the south of this area. √ 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. √ Protect the valued recreation access opportunities representing by the numerous PRoW and locally promoted routes linking Canterbury City, the Blean woodlands and the coast.' End quote.

In Britain we are losing our natural habitats at an unprecedented rate, with some species declining in the last 30 years by up to 70%. Not only the birds red listed earlier, but more importantly insects – pollinators, without which, we as a human race will not exist. We have the opportunity to be part of a bigger picture of global change and preservation – **Kent Wildlife Trust have indicated how they would use the Blean landscape to reconnect areas of natural wildlife. This is what CCC and the University could be pursuing.**

CCC's own document referred to above, says it all. None of this has changed in the intervening few years. The landscape is the same, the rivers are the same, the historic nature and culture are the same – therefore this report is as true today, as in October 2020 and as such. **Policy C12 is in direct contravention to this and should be removed from the draft local plan.**

### **Agricultural Land**

As well as biodiversity, we are in danger of losing our farmland. Again at a time when we are in most need of food. The University was a champion at one stage for Food and Farming. What happened? The farmland also provides much needed nesting sites for skylarks.

7.

## Infrastructure

### Waste water:

Policy C12 1. (iv) 'Provision of a new high quality waste water treatment works at an appropriate location within the site'

Where? Certainly not in the middle of the 'new settlement'! To the north of the Tyler Hill Road, would seem to be most logical. However, this poses even more issues for the THR.

Tankers/lorries will have to access this site. As we do not have much of a plan to refer to, how will this be achieved?

### Flooding:

We have been told C12 will not be in 'Flood Risk 1'. This does not take into account the surface flooding that is becoming more evident with each successive wet winter and spring. The ground is made up of London Clay, with a top covering. When wet it is a mucky sticky mess! Ground water pools in many areas.

C12 3 (a) 'Provide a coordinated and multiscale sustainable urban drainage network, including a linear park with integrated SUDS components running through the development using the existing valley formation running through the centre of the site'.

SUDS is by no means a proven method of drainage and in this context, run-off into the Sarre Penn is wholly unacceptable in so far as it forms part of the River Wantsum Water body, and as such can impact on Stodmarsh Wetlands, an area deemed in by RAMSAR of International Importance.

Twice in the past two months, Tyler Hill Road near the top end (Blean) has been fully closed for several days, to deal with water issues caused by drainage problems.



Tyler Hill Road closure March 2024

Referring back to Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020. Chapter 6 page 164 – Landscape description – Natural Influences.

### Quote:

Areas of unimproved pasture persists and are locally designated as the Blean Pastures LWS and Tyler Hill LWS. Blean Pastures consists of a series of **damp meadows sloping down to the Sarre Penn**, while Tyler Hill comprises a series of small unimproved pastures and meadow, with winter wet ponds, scrub and woodland. The Tyler Hill Meadow is an LNR.

8.

### **Medical**

GP's waiting times are at a record high, with the nearest A & E at the William Harvey in Ashford or QE QM at Margate. Even if a GP practice is set up at the 'hub' there is no reason to suggest there will be enough NHS GPs to man it.

### **Consultation Issues**

Whilst I commend CCC for providing forums where local residents could question the Draft Local Plan; in the first place:

- a) No residents of Blean, Tyler Hill and Rough Common nor Parish Councils, were advised of the Policy C12, prior to the DLP being made available (March 2024).
- b) From CCC website: 'This Statement of Community Involvement was adopted on 9 October 2019. It explains how we aim to involve the community in each of these planning functions.' 'We encourage applicants - particularly for larger developments - to engage with local residents, parish councils, amenity groups and so on at the early stage before submitting a planning application to allow these groups to have their say early on and shape more detailed proposals'
- c) Avison Young, however, in conjunction with the University of Kent had had over 14 meetings in the past 2 years, with Canterbury City Council, without agendas, or minutes!
- d) Financial problems the University of Kent is experiencing is not a legitimate planning consideration. Any attempt to put pressure on CCC to accept such considerations is therefore, wholly unacceptable.
- e) Residents not able to access the Internet have been very much disadvantaged. Documentation available on paper is bulky and expensive and takes time to be processed. Many residents I spoke to were daunted by the Consultation process, and could not entertain the idea of completing an on-line form or even email. Letters, which are clumsy and time consuming are their only option.

### **Summary**

I have read and digested, where possible, reams of publications/reports, both on-line and in paper format. We only had 12 weeks to process and assimilate the contents of these mammoth documents, 6 months would have been more realistic.

We are expected to respond to Policy C12 in 2000 characters – unrealistic and unreasonable.

In this process, I have felt myself at my lowest point, mentally and physically exhausted by the thought of losing our green natural space. Not just the residents of Blean, Tyler Hill and Rough Common but for Canterbury and for Nature as a whole. Once gone, so too will be the opportunity for that connectivity of biodiversity that was lauded in so many CCC and University documents. **Policy C12- Land north of the University of Kent should be therefore be removed from the Draft Local Plan.**

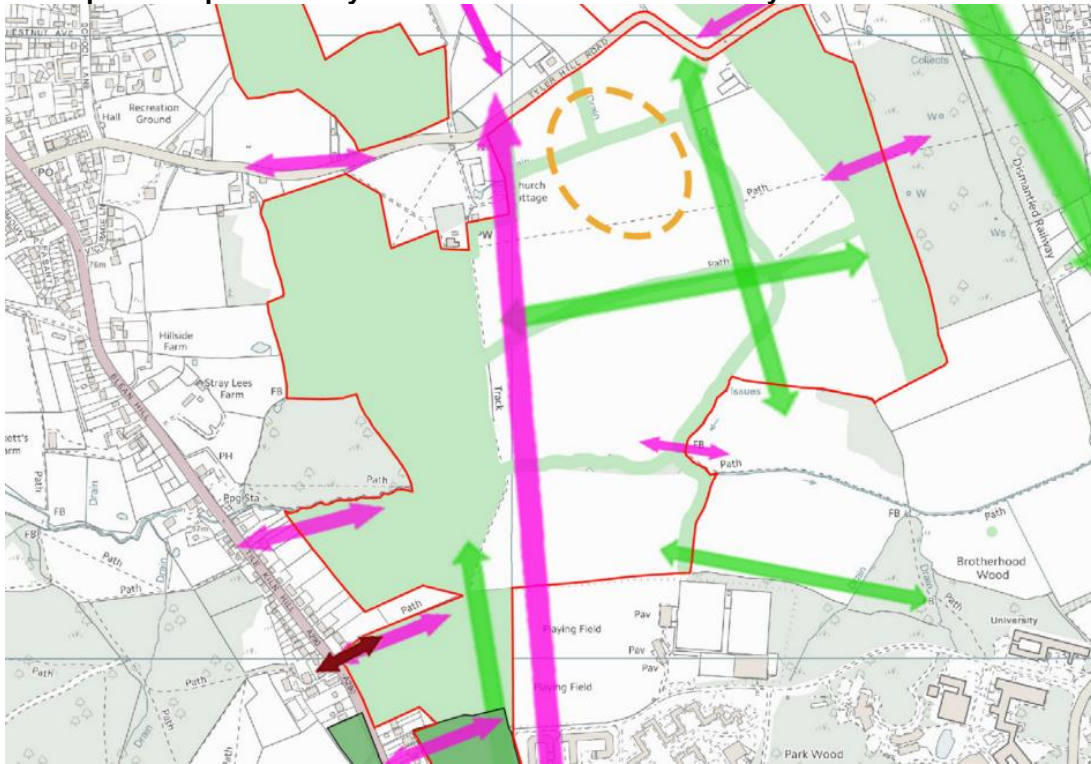
It has taken many hours to compose this response, thank you for taking the time to read it.

**(Addendum below)**



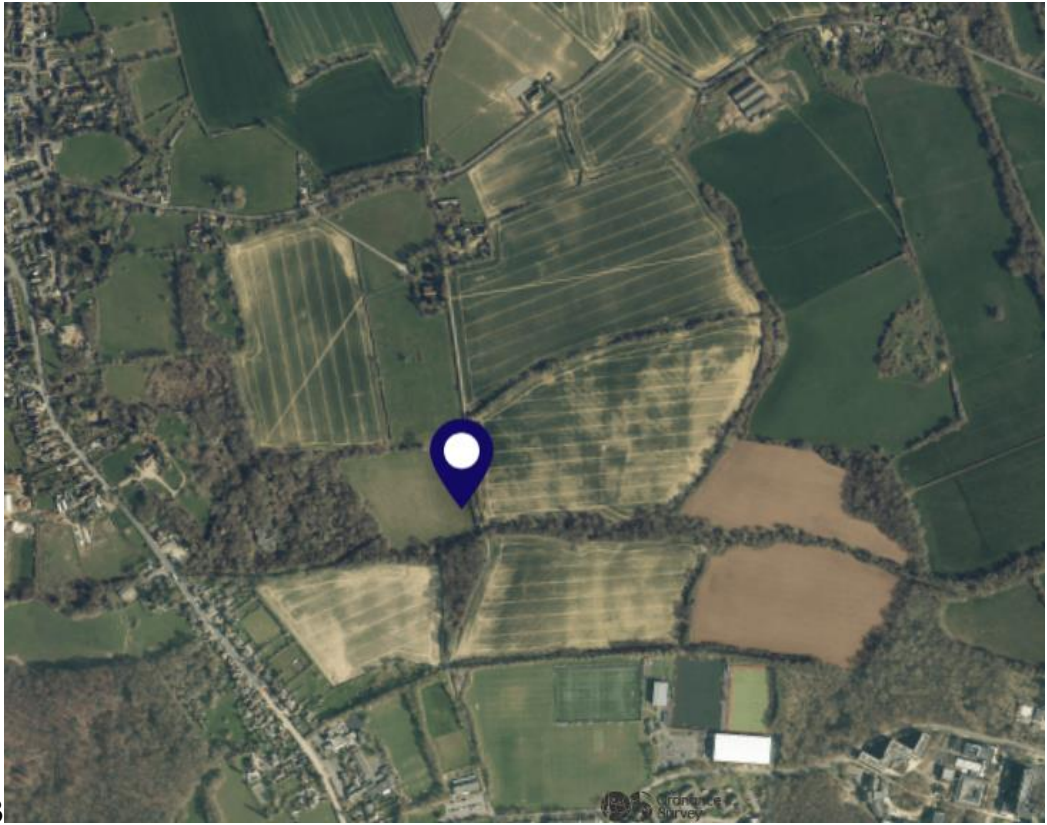
**Addendum to 'Nightingale Survey'**

**Concept Masterplan - Policy C12 Land north of the University of Kent**



**TR129608**





TR129603

TR126603





