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Local Plan Consultation

Canterbury City Council

Military Road

Canterbury

CT1 1YW

20th May 2024

Dear Sir

We write to lodge our objections to the proposed Canterbury District Local Plan 2040 and, in particular, to Chapter2 C12: the proposed development of Kent University land in Blean.

Chapter 1 Q1 and Q2

Our understanding of current government planning legislation is that councils are no longer bound by the government targets cited at the consultation meeting in the Guildhall as part of the reasoning behind this plan. (This was referenced by Mansell Jagger, retired planning officer for Canterbury in a letter to the *Kentish Gazette*, as I am sure you are aware.) Councils are also allowed to object to any government targets, arguing special circumstances. We believe that there are many reasons why Canterbury's planned expansion would fall into this category.

Firstly, the planned expansion in house building is to supply a perceived need that is likely to be unnecessary by 2040. University student numbers are falling markedly, and this trend is likely to continue. Kent University and CCCU have both built new developments to cater for student accommodation. More are planned, such as the Giles Lane development. There are similar private initiatives all over the city. Canterbury is the city in the UK with the highest density of student population per capita to permanent residents. Large areas of the city (St Stephen's, North Holmes Road) have a huge numbers of HMOs. With the mass expansion of purpose-built student housing, and falling student numbers, many houses in these areas are likely to be released for general housing, rendering a huge expansion in building new houses unnecessary.

Secondly, we are in a period when the birth rate is falling to unprecedentedly low levels. This alone will result in reduced housing need. Much of the larger housing stock in Canterbury is currently occupied by the baby boomer generation and many of those are in their late seventies or older. In many cases, couples or single people are living in family houses with four or five bedrooms. By 2040, the death rate in this section of the community will have resulted in large numbers of houses being available to house new occupants.

Another key reason against development on this scale is that Canterbury's infrastructure, both physical, such as the road network, and social, such as healthcare, social services provision and schooling, simply cannot cope with an expansion of the city of this magnitude. Canterbury's position, and landscape, make a ring road such as those in Nottingham or Norwich an impossibility. The increased traffic density close to the walled city and the Unesco listed world heritage site will inevitably cause damage to people, the natural and the built environment. You are the current guardians of all of these. If you think how close the planning committee came to demolishing the Westgate in the 1960s to improve traffic flow, and how we would now feel if that had been accomplished, you will, we are sure, understand how your actions, if you allow development on this scale, will be judged by future generations. You must have the courage to revoke the Canterbury District Local Plan 2040 and to avoid the appalling damage that the plan in its current form would cause to the city, the surrounding environment and settlements and to the lives of future generations.

Our strongest objection is to Chapter 2, Policy C12.

The objections to this proposed development are legion.

Firstly, the land outlined for development is Grade 2 and 3 agricultural land and should be used to grow food. The UK needs to increase our food security at a time of global political uncertainty and ecological threat. We cannot continue to concrete over productive land. Food shortages in the pandemic, threats to global wheat supply because of the war in Ukraine, and climate change resulting in crop loss in the UK, Europe and worldwide, all mean that we must not simply rely on importing what we need. Growing more food locally would also result in fewer food miles, and we know how important that would be in combatting climate change.

Secondly, the land outlined for development is extremely precious, both in terms of heritage and amenity value to the current generation and those to come. You will be aware of Grade 2* listed St Cosmus and St Damian, the Roman and medieval remains in the adjacent field, the ancient remains in the site earmarked for housing and the 'hub' and the historical importance of the listed buildings and conservation areas in and around the site. The Salt Track, itself an ancient route of importance, would become little more than a path through a housing estate. The land under consideration is part of the 'green lung' between Canterbury and Whitstable, stopping Blean, Tyler Hill and Rough Common becoming one large conurbation and maintaining the individual character of these three ancient settlements. Local people, and tourists, regularly walk this land and value it as a precious amenity.

Thirdly, the development of this site would inevitably threaten the ecology of the area. An RSPB representative confirmed to us that the organisation will be writing to object in the strongest possible terms to the proposal, fearing irreparable damage to Blean Woods as a result of increased footfall, air pollution and light pollution.

Blean Woods is a really special place and it is under threat. We have lived in Blean for thirty years and have seen huge changes in the woods in that time. And we are not ecologists, or experts, or even particularly skilled birdwatchers. In that time, the Blean Woods complex has lost many of the species that used to inhabit the wood, such as nightjar, woodcock and turtledove, all of which are red listed. Nightingale numbers are markedly down. We no longer see swallows, swifts and house martins. Glow worm numbers have crashed. We no longer hear cuckoos or see lapwings. The loss of ground nesting birds is directly attributable to increased human footfall and dog walking. The huge increase in the number of people using the woods during the pandemic resulted in untold damage

which foreshadows what would inevitably happen if this huge development is allowed. Our family cleared litter, saw illegal camps and mini raves, notified the warden about illegal camping, stopped people lighting fires. We notified the fire brigade about smouldering fires. Much of this was directly attributable to large numbers of people using the woods as a recreational space - as a large park that simply happened to have a lot of trees. You may be aware of the damage caused to the remains of a Roman camp near Rough Common by people creating ramps for BMX and mountain biking. Hugely increased human presence in the woods results in inevitable damage to their ecology and the remains of ancient settlements that they contain. You cannot expect a development of two thousand houses, with a likely population of 7-8 thousand, to have no effect on this precious, listed, nationally important site. The air pollution and light pollution alone would impact further on many of the species mentioned above. The increased footfall would damage already threatened ecology further. Blean Woods is one of the last remaining expanses of ancient woodland in the south of the UK. It is of inestimable importance. It would be an appalling act of ecological vandalism to proceed with this planned development.

The C12 site may just look like fields ripe for development, but they are home to red-listed skylarks. We have heard yellowhammer, firecrest and many other species there. The ecological survey will show you how precious that landscape is. The site contains an interesting mix of habitat, comprising open fields, ancient woodland, ancient hedgerows, field margins and the Sarre Penn and its valley. C12 is a huge slope, and run off from the site (amounting to a considerable stream this past, wet winter) will discharge directly into the Sarre Penn itself. This is a river already profoundly challenged by foul water discharges and associated ecological damage, including the death of many fish. Run off contaminated with all the things that accompany human development (pesticides, detergents from car and window washing, oil from leaking cars and so on and so forth) will flow downhill, directly into the Sarre Penn and thence into the watercourses to threaten our drinking water and the wider environment. Partly due to the steep slope, the roads within the development, and the hard surfaces surrounding houses, will cause more problems with drainage. Additionally, by 2040 many of the cars on the proposed development would be electric. These are generally heavier and therefore result in more tyre deposits on roads than petrol cars do. These deposits contain carcinogens which will go directly down the hill and into the river.

A further consideration is that two thousand houses would not only cause problems with natural water drainage, they would also place a huge strain on the built water, sewage and drainage infrastructure, both in Blean and Tyler Hill and further down the hill towards Canterbury. There are houses in the Cherry Gardens area that have had to have non-return valves fitted to toilets already because of the volume of discharge heading down the system from higher up the hill. Two thousand extra houses are likely to cause terrible problems for our aging and inadequate sewage and foul water drainage systems in Canterbury. The Blean is notoriously wet land and concreting over farmland is likely to cause huge problems with rainwater management in the wider area and the three villages. The existing sewage system and waste water system struggles to cope. There have been incidents where sewage has backed up into gardens along the Tyler Hill Road and in other places in Blean after heavy rainfall. Adding 2.000 extra houses is no way to cure this. The development proposes a waste water treatment plant at some point north of Tyler Hill road and to the east of the site. This will devalue properties. Smells from the treatment plant will blight the new development and the existing village housing. There will also be a risk that overspill and/or run off will enter the catchment area for Canterbury's water supply. A report published 21st May 2024, led by the Royal Academy of Engineering, makes the point that human treated effluent discharged into rivers remains highly contaminated by human faecal organisms and that these are a danger to public health. Putting a wastewater plant on wet land, with drainage problems, in the water catchment

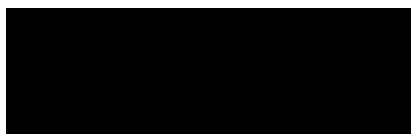
area of the planned Broad Oak reservoir, runs counter to common sense and plays fast and loose with public health in the local and wider area.

Most bizarrely, the C12 plan contains the assertion that the development will increase biodiversity by 20%. This figure is unsubstantiated and cannot be proven. Even KCC's ecological spokesperson (Councillor Dawkins) agreed when she met us that it is merely an aspiration, with no science or substance behind it. Your plan states that green corridors will be created, but the reality is green corridors that have existed for millennia will be destroyed by brown corridors you propose to build. Precious ancient hedgerows, ancient woodland and field margins will be removed. None of this will add to biodiversity. I am sure that the developer will offer green spaces and some tree planting, the so-called 'green corridors' but artificial planting, or little pockets of land left untouched, cannot substitute for an ecological system that has developed over thousands of years and that would be destroyed by developing this land.

If these arguments are not enough, please consider the folly of the planned traffic arrangements. A development of this size is akin to a small town. It is totally out of scale with its surroundings. And it is planned that the access will be primarily by two roads. One of these would join St Thomas's Hill at a point where there are two large schools. This is absurd. There is no sensible solution to the inevitable traffic this proposed development would create since the other roads in this area are narrow, or hilly, with sharp bends and bad accident records. There are regular incidents on the Blean road and the Tyler Hill Road. Most of the latter has no pavement. Widening it would be next to impossible without demolishing homes. Under the plans, Rough Common Road would become a bypass in all but name. Again, it is hard to see how widening it would be possible. The demolition and rebuilding of Blean School (Ofsted outstanding) would adversely affect continuity of education at this highly-regarded primary school and access to the new school site and the hub would be difficult for people in the existing village housing. The difficulty of access alone makes this planned development a dangerous and foolish proposal. Assertions that a better bus service, and walking routes, would mean that there would be little need for cars - made in answer to a question at the Guildhall meeting - are ridiculous, not least because the site is on a steep hill. No one is going to try to walk up that slope with a week's shopping, or when it is raining, or really hot, or when they have tiny children with them, or when they are old and infirm. Most of those 2000 houses will have two or more cars, and the effect on local traffic, safety and air quality will be terrifying. Even the Land Assessment labels this site as 'car dependent.' Given everything that we know about global warming, developing a site of this nature is irresponsible.

Lastly, the council's own Landscape Character Assessment describes the 'strong rural character' of this area. That should be preserved. This is the wrong development in the wrong place. Please, think again.

Yours faithfully

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Dr John Moss and Mrs Christina Moss