

## Alexander Gunyon

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**From:** [REDACTED]  
**Sent:** 22 May 2024 14:27  
**To:** Consultations  
**Subject:** Local Plan - Objection to Proposed Housing Development between Blean and Tyler Hill

**Categories:** Blue category

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### --Email From External Account--

Subject: Local Plan - Objection to Proposed Housing Development between Blean and Tyler Hill

I am writing to object to the proposed development between and around Blean and Tyler Hill. I have lived in East Kent for over [REDACTED] years and in that time have witnessed the continual development spread and building of houses resulting in the loss of countryside, and the identity and character loss of this part of the "Garden of England". It's simply too much and not needed - Enough is Enough!

And my points cover and are in relation to the following points of the proposed local district plan:

Chapter 1: Spatial Strategy

- Q1 – Vision for the District
- Q2 – Strategic objectives
- Q3 – Environmental Strategy SS1
- Q6 – Transport Strategy SS4
- Q7 – Infrastructure Strategy SS5

Chapter 2: Canterbury

Qu 12 – policy C12

Chapter 5: Rural areas

Chapter 6: District-wide strategic policies

- Q.12 – Rural Economy
- Q.14 – Sustainable Transport
- Q.19 – DS19 Habitats, Landscapes and Sites of Local
- Q.21 – Biodiversity Recovery

I have several major objections and questions. Namely that:

1. The proposal dramatically contradicts CCC's stated aims of supporting the "rural character" of the District. And to note I feel it is misleading situating Policy C12 in the (urban) Canterbury chapter without at least cross referencing to it (Policy C12) in Chapter 5, which sets out the relevance of CCC's policies towards the countryside. If the "development" proposed on land north of the University of Kent is, as it is promoted a "free standing rural settlement", why is the policy then treated within the (city of) Canterbury chapter?
2. The scale of development in this area is unsustainable and overbearing– the cumulative development around Canterbury and surrounding villages is massive and needs better and improved additional infrastructure before any further development takes place in any shape or form at whatever stage it is at now.
3. The land between and around Blean and Tyler Hill lies in an area of High Landscape Value, SSI's including some of the most historic and ancient woodland in the whole of the country.
4. Loss of high grade prime Agricultural Land: The development of land between and around the two rural communities will result in the loss of some of the best and most versatile agricultural land in the whole district/SE. Parts of the land are currently farmed for cereal crops and is therefore likely that these are Grade 3a rather than 3b. Grade 3a is best and most versatile agricultural land and its development for

housing would be contrary to policy EMP 12 of the current local plan and policy DS12 of the draft local plan. In addition, the National Planning Policy Framework requires that local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality, and if agricultural land is to be proposed for development the economic and other benefits of that land should be taken into account. The housing evidence base which supports the draft local plan does not address this requirement.

5. The development is outside the urban area: The land at between and around Blean and Tyler Hill is outside the urban boundary of Canterbury and it has not been adequately demonstrated that its development is necessary to meet local needs. This development is called a “rural settlement” but in reality it’s a new town of 2,000 houses being attached to the northern edge of Canterbury, in what is at present the rural gap between the city and the villages of Blean and Tyler Hill.
6. This does not satisfy policy DS19 of the Local Plan, as this 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, landscape or adjacent listed buildings, particularly Blean Church and Church Cottage
7. Landscape Impact: the land between and around Blean and Tyler Hill lies in an area of High Landscape Value. The Council’s 2021 Landscape Character Assessment describes the “strong rural character” of this area with its mix of woodlands, orchards and farmland, and talks about the need to conserve this landscape. The southern part of the site is located in Canterbury’s Area of High Landscape Value, and it is between two Sites of Special Scientific Interest – RSPB Blean and West Blean Reserve. The C12 proposals are incompatible with the 2021 Land Character Assessment, to which the Local Plan is required to conform.
8. The land between and around Blean and Tyler Hill is a precious green field site, offering a vital sanctuary for wildlife and contributing to the overall ecological balance of our community. The destruction of this green space would result in the loss of biodiversity and disrupt the delicate ecosystem that currently thrives in the area. Preserving such natural habitats is essential for maintaining a sustainable environment and ensuring the well-being of future generations.
9. The development site is right in the middle of the Blean Woods area, surrounded by various parts of the National Nature Reserve. There are numerous rare and endangered species living in the fields, ponds, hedgerows and Sarre Penn valley. The Council’s other policies (eg SS1.10) states “The council will continue to work with partners to... support the extension and improved connectivity of the Blean Woodland Complex.”, but this development contradicts that completely. In fact the development would cut across the Blean Woodland Complex making connectivity impossible. There is insufficient evidence to suggest that there would not be a deterioration of irreplaceable habitats including ancient woodlands as such there is a critical concern that there would be a significant impact on the local wildlife and their natural habitats – such as the ever-decreasing populations of Heath Fritillary Butterflies, nesting Skylarks, Nightingales, Turtle Doves, and Great Crested Newts. This would result in a negative impact on the biodiversity of the area for certain.
10. Insufficient infrastructure
11. Huge increase in traffic. The proposed two main access points for traffic are both on Whitstable Road, near the Rough Common roundabout. Rough Common Road would require “highways improvements” and two new slip roads on the A2 at Harbledown to be built – meaning Rough Common would be a major route into Canterbury. There would also be more traffic coming into Canterbury down Whitstable Road to St Dunstan’s roundabout and down St Stephen’s Hill, creating more congestion and affecting air quality. The roads cannot cope with the flow of traffic at commuting times at present, and then there is the steady stream of traffic caused by visitors at weekends. Traffic is already horrendous in the area with over 3,000 cars a day along Rough Common Road; The road system in Canterbury suffers gridlock at present this is just going to exacerbate the situation.
12. The proposal would have impacts on many “heritage assets” including the Church of St Cosmus and St Damian as well as its setting, the remains of a Roman Villa and some Mediaeval Tile Kilns (both scheduled monuments), multiple Listed Buildings and multiple Conservation Areas. The council’s Environmental Strategy set out in the Local Plan says “the district’s heritage assets are highly sensitive to change and the council is committed to protecting and, where possible, enhancing the historic environment for future”. Massive housing development such as that proposed is likely to have a serious impact on these heritage sites currently in a rural setting and free from vandalism and graffiti, which are known to be issues in more urban areas.

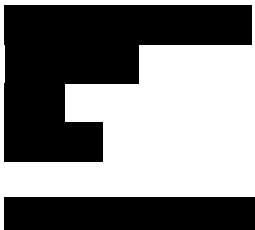
13. Increase in demand for water supply – every year we seem to have a hosepipe ban. Hose-pipe bans are a common occurrence in Kent - in fact, we are a "water stressed" area where abstraction is normally more than 20% of effective rainfall.
14. The proposed development on the land between and around Blean and Tyler Hill raises the risk of increased flooding in the surrounding areas. The area's green fields currently act as natural drainage, absorbing excess rainwater during heavy rainfall and reducing the likelihood of flooding. The replacement of these fields with impermeable surfaces such as buildings and roads would disrupt the natural drainage system and potentially exacerbate flooding issues, placing both existing and future residents at risk.
15. The risk to diminution of any receiving watercourse and flow to the sea hasn't been considered. The water catchment area here joins up with brooks that flow towards and around Whitstable and there will be a highly likely impact on the water courses of the area possibly making them more seasonable, drying up and the potential for some freshwater habitats to be destroyed, and also subject to torrential flow and wash aways at times.
16. The proposed development fails to adequately address the potential sewage issues that may arise. The increased strain on the existing systems due to the additional housing units could lead to overflows, pollution of water sources, and a decline in water quality. Our current system is already beyond capacity, discharging more into the rivers and sea at every available opportunity which is totally wrong and unacceptable. This risk has an environmental and economic impact on both Whitstable in one direction and Canterbury in the other as well as the current rural settlements.
17. Impact on physical and mental well-being generally with lack of open spaces and increased noise and air pollution due to traffic etc.
18. Higher demand on local health services doctors, dentists and hospitals which already have issues coping with the current population. Kent and Canterbury has been downgraded so QEQM or the William Harvey are our local hospital. Given the amount of new housing in these areas already this is getting to a point of critical failure of the whole healthcare system locally. Building new houses is just going to put a further strain on a health service that is on its knees as it is. The same with dentists and other healthcare services, we do not have the capacity for more people.
19. And without an A&E service at the Kent and Canterbury Hospital, journey times for emergency ambulances given the increased traffic on the roads and waiting times in A&E given the increasing population are only going to get worse.

The majority of new housing is not affordable for young people, who were born here, continue to live and work here, and shared ownership schemes disadvantage them and narrow their options. We cannot keep building more and more on greenfield sites to meet government targets, and proposing schemes which give the local population no benefit whatsoever only adverse impacts to deal with.

Again I strongly object to the proposed development at between and around Blean and Tyler Hill.

Yours sincerely

Tim Elgar

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