

Consultation and Engagement Team  
Canterbury City Council  
Council Offices  
Military Road  
Canterbury  
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27 May 2024

Dear sirs

**Response to the draft Canterbury District Local Plan 2040.**

**Ref Chapter 2 Canterbury, Policy C12 Land north of the University of Kent campus.**

I am a resident of the Canterbury district and object to the proposals of C12 of the local Canterbury District 2040 Plan

The land outlined in C12 was previously deemed “unsuitable for development” for reasons of access, wildlife corridors, agricultural land”. Now it seems that despite all the previous reasons the land is NOW suitable-when there have been no changes in the proposed area.

The Plan is not only flawed, contradictory to the ethos of the University of Kent but also undeliverable for various reasons.

**Consultations:**

The draft Canterbury District Local Plan 2040 was not communicated to local residents other than by posting it on the CCC website. Many residents in the Rough Common and Harbledown areas do not have access to the internet and were unaware of its implications on their lives and wellbeing until local campaigners from Save The Blean knocked on their doors with leaflets on the draft Plan. It has been “consultation by stealth” in the hope that local people will not be aware of it. There has not been any paper based communication from CCC. This has effectively disenfranchised a large percentage of the local population.

I attended 3 Consultation meetings (Whitstable, The Guildhall and Westgate Hall), and at each one questions from the floor were quashed by the Chair (Peter Davies) who gave lengthy responses but did not answer the questions made. This led to frustration amongst attendees and gave the impression that the CCC officers present did not really care about the views of local residents who turned out in their hundreds to attend these meetings. The 30 minutes discussion that was advised by CCC in their notice of the 4<sup>th</sup> Consultation on 21/5/24 did not take place. The Chair (Peter Davies) cut off further questions at 8:30pm leading to more frustration. The CCC advertised so-called “private discussions with officers” but this did not take place, clearly misleading the local residents who gave up their time to get to the Consultation.

The CCC and Planning officers have not listened to the local residents and their protests at the 4 Consultation meetings.

A protest march against the Plan was held on 25 May attended by over 300 local people. Further evidence of the frustration and anger of the local residents regarding the about turn of Planners re this area of outstanding landscape and biodiversity.

**I object to the plan to create a “new settlement “ as outlined in C12 for the following reasons:**

**General:**

I object to the map on Page 52 being included in the Plan C12. CCC have used an out-of- date map. There are inaccuracies and it is misleading, namely a “Green Gap” across Whitstable Road. Are you planning to plant trees across Whitstable Road? This area is already “green” being used for grazing fields for sheep and horses and alpacas. The remainder is used by Kent College as playing fields for cricket. Similarly, the “green gap” adjacent to and behind Blean House is already “green”. We are repeatedly told by CCC Planners at the Consultation meetings that the maps are “conceptual” and “indicative” only. They have refused to re-issue more accurate maps in order that residents can fully understand the implications.

**Access:**

Rough Common Road: SLAA of December 2023 states that this is already a very busy road and the term “provide highway improvements” so as to allow construction traffic for many years to the new settlement is a recipe for disaster for Rough Common and Harbledown. This is simply a rehash of the previous Administration’s “Zoning” traffic plan (Western Bypass)! It is difficult to imagine how the road could be “improved” with many houses lying very close to the road. Also the pavement width is already very restricted on certain stretches. It was confirmed by councillors at the 3 Parish council meeting held that Rough Common Road will be reinforced in order that the construction traffic can use it to gain access via the Conservation area to the new settlement site. Does CCC propose to get rid of these pavements on Rough Common Road to widen the road? if so residents will not be able to walk along Rough Common Road to the northern end to catch a bus to the City centre. Bus operators have already withdrawn the service along Rough Common Road (RCR), so why should they reinstate it on a much more crowded and slower RCR?

Policy DS7 states that “developments which cannot demonstrate that necessary infrastructure can be delivered at the right time will be refused”. There are no details in the Plan as to how the necessary infrastructure, roads, water etc will be delivered. The primary road access to the development will be across a Conservation area.

The proposed primary access point opposite Kent College is over the Crab & Winkle (Sustrans National Cycle Route 1) will be through a Conservation area and this also covers houses on the south side of Whitstable Road (A290).The cyclists will be running through a building site for years to come.

The secondary access point proposed is via the current site of Blean School. It appears that it is proposed that the new school building, somewhere up on the development site, is to be constructed once the primary road has been built. However, once the new school is built it looks as if it will be in the middle of a construction site for several years. This will have a disruptive and detrimental effect on the school and the children for years. Currently classed as “Outstanding” by OFSTED, we understand that KCC Education in conjunction with the School have yet to undertake an education impact assessment. The Plan states the current 2FE Blean School is to be re-sited plus the provision of a new 3FE Primary school.

In particular how will the children, teaching and support staff get to the new development schools (2) with construction of houses etc continuing for many years.

At a meeting of Blean Parish council shortly after the Plan was announced, the Chairman of Governors advised the meeting that the School had not been consulted on the plans to move it to the new settlement.

The huge increase in the population, through the development of numerous new housing sites, in the Canterbury district will also impact the provision of secondary education. New secondary schools are planned for Whitstable and Herne Bay to ease pressure on the schools in Canterbury itself. Yet I am reliably informed by the Head of a leading grammar school in Canterbury that there has been no consultation with KCC Education or CCC on how this will impact the catchment areas, traffic flows, supply of school buses and the supply of qualified teaching staff to cater for the increase in student numbers.

Tyler Hill Road and Wood Hill are already busy commuter routes in/from Canterbury city. The proposed access routes to the new settlement from Whitstable Road (via the current Blean School site) and Rough Common Road, will encourage more traffic to use the Canterbury/Chestfield route.

However, this route will also be adversely affected by the proposed 1400 house new settlement at Brooklands Farm.

**Habitat:**

DS18: The proposed development will materially harm the natural environment. Kent Wildlife Trust's (KWT) rewilding project have stated that such a plan is "disastrous". Both KWT and CPRE Kent are supporting the action group "Save The Blean" objection to the Plan 2040. The proposals will be devastating for the Great Crested Newt population in the area. UKC has dedicated ponds for this protected species on their campus which lie directly in the path of the primary access route.

DS23: The Blean Woodland complex. The Plan states that CCC "will support plans to expand and connect the valued woodland habitat." The proposals in the Plan will destroy this habitat and should be refused.

**Transport:**

Policy DS14 suggests the use of e-scooters and cycle hire. It is not legal at present to use e-scooters on the public highway. How do the Planners expect residents to negotiate the hilly area of the new development.

Policy DS15 states "proposals for development must ensure adequate vehicle parking provision" yet CCC refuse to accept that 2000 houses will generate at least 3000 cars which will not have adequate parking places. Also with the Bus First and Walking DS13 Movement Hierarchy CCC seeks to prioritize sustainable travel options- Walking and Cycling. The proposed development is too far from the Canterbury city centre transport links to encourage Walking and Cycling. The landscape of hills is not suitable these modes of transport. It seems that the Planners have not walked the proposed development area.

C12 does not comply with SS4 (1.49) We are advised that CCC will not be able to produce a detailed Transport Strategy until late June ( Cllr Dan Smith vice chair of CCCPlanning Committee). The local Plan talks about "significant investment in movement and transport infrastructure is needed to support the delivery of the new rural settlement". The Plan does not detail the infrastructure so it is impossible to respond.

The SLAA mentions that the settlement proposed will be car dependent. The Plan (Ruth Doudie) emphasises in text and at the Consultation meetings ( 4 in total) that the policy is to be "Bus First".

Yet we know that Stagecoach who use the current central bus station in Canterbury have stated that it is already full to capacity and cannot take additional routes. Even the current service is unreliable. I tried to get a bus into the City centre on 22/5/24 only to find that the buses had been diverted via the Rough Common Road and bypass into Canterbury via London Road. As I walked into Canterbury down St Thomas' Hill I met other potential passengers waiting at the bus stops, also in ignorance of the diversion. How will the buses cope with the policy of bus first if they cannot cope now?. There is no public bus service along Rough Common Road which results in isolation of many residents who do not have their own transport. They are too elderly to cycle or walk and with the increased traffic on this road the situation will only result in further isolation. It is as fine ideal to have a "Bus First" policy but in reality this is not possible. Even the CCC Head of Transport policy admits that "not everyone will be able to get a bus" ( Westgate Hall consultation 21/5/24) .

It is therefore impossible to respond to a Strategy without it being in the draft Plan.

The transport and traffic proposals in C12 do not follow the standards set out in the Land character Assessment to which the draft local Plan needs to follow.

The new settlement of some 2000 houses will probably have in excess of 3000 cars. Plus delivery vans and visitors. With two planned access points, from opposite Rough Common Road and Whitstable Road (through the current site of Blean School), there is going to be a major traffic jam at peak times, with tail-backs along both roads. Even nowadays without the additional housing there is congestion outside Blean School and Kent College at drop off and collection times. The proposed traffic scheme appears to re-route traffic from Brenley corner up Palmars Cross Hill (and vice versa). Currently there are Canterbury bound traffic queues in the morning rush hour right back to the filling station on the A2. The Plan proposes the current two lanes on the Rheims Way be reduced to one lane for cars and the other for buses. How will two lanes of traffic be converged into one lane without further traffic jams backing up on the slip road into Canterbury? Further congestion will arise with the replacement of roundabouts with traffic lights. No Traffic Plan has been issued by CCC

#### **Air quality and pollution.**

DS16 Air Quality: "Development which has an unacceptable impact on air quality will be refused" With the increased traffic flows from the new settlement and especially during the construction stages (we have not been advised in the Plan of any timescale) of the new access roads ( Rough Common Road in particular) and the building of the new settlement itself, there will be a massive reduction in the quality of air in the area. This will be exacerbated by the recently approved planning decision for the construction of some 23 houses at 51 Rough Common Road which in itself will lead to more traffic and initially construction traffic using Rough Common Road to access this development. This will lead to increased demands on the already overstretched local resources of the NHS ( Kent & Canterbury Hospital and NHS Estuary View at Whitstable and local GP surgeries). There is already an isolated elderly community in Rough Common. Using this road for construction traffic will only add to their isolation.

#### **Impact on Health & Medical resources:**

The huge amount of new developments, both current and planned, in East Kent with only Emergency A & E at Ashford and Margate, are already putting enormous pressure on the NHS staff. This was highlighted at the Whitstable consultation by the Head of Clinical services at NHS Estuary View, Whitstable. There is no current GP Surgery in any of the three villages (Blean, Tyler Hill and

Rough Common/Harbledown) and the Plan makes no references to how the already stretched facilities will cope with dramatic increase in the local and ageing population.

### **Heritage:**

**DS26:** Policy states that the Plan should not generate levels of traffic , parking or other levels of environmental problems resulting in unacceptable harm to the character, appearance or significance of the Area. On this basis the Plan clearly contradicts this Policy and should be refused.

The Plan will destroy many of the heritage assets, and their settings, of the area including St Damian and St Cosmus Church. This has within its cemetery several Commonwealth War Graves including a World War gravestone which points across the fields towards Tyler Hill commemorating Major Trueman whose family used to live in Tyler Hill. The new settlement will block out this view from the gravestone and from the public bench sited just outside.

Also there are the remains of a Roman villa and Mediaeval Tile Kilns (both scheduled monuments) various Listed buildings ( Hothe Court, Blean house) and Conservation sites including the primary access point proposed ( junction of Whitstable Road/Rough Common Road). Apparently CCC are committed to protecting and “enhancing the historic environment for the future”.

### **Landscape:**

Re Policy SS1: The Sarre Penn flows across the middle of the proposed development site in a valley with steep sides. There are TPOs (Tree Protection Order) across the valley.

The Plan proposes not to “adversely affect the landscape, ecology or setting of the Blean Woodland complex, in line with Policy DS23”. Yet the new settlement and its construction will destroy the landscape, historic settings and lives of the local communities.

There is contradiction in the Plan which states that the CCC will “work with partners to support the extension and connectivity of the Blean Woodland Complex”. That “extension” will not be physically possible with the construction of roads and houses etc in the middle of the KWT plan to rewild the area between the two Blean woods.

I often walk down the C & W footpath towards Blean Church to enjoy the views and sounds of nature. The new settlement will destroy this environment for ever for future generations.

The noise and pollution to the air along Rough Comon Road will have a detrimental effect on the adjacent Blean Woods/RSPB site.

### **Water and Flood risk:**

#### **Policy DS17**

There is no detail in the Plan as to how the provision of “high quality on site” wastewater treatment facilities are to be provided. The Sarre Penn natural habitat for wildlife is at threat from the

development. There is already a shortage of water supply in the Canterbury district. It is rumoured that tankers will be used to remove wastewater from the development site, but no mention of what access roads will be used for this traffic. It is impracticable and flawed and will only add to the air pollution for generations to come.

**Policy DS20 :**

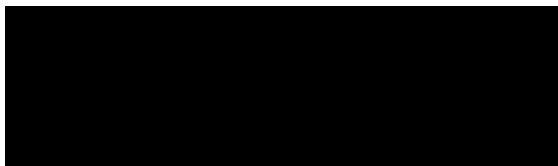
This development will lead to increased flooding off both of the slopes down to the Sarre Penn. The subsoil of the Blean is comprised of London Clay. With Climate Change (CCC itself has declared a Climate Emergency) we are certain of more regular flash floods. The construction of 2000 houses, tarmac roads and paths will only increase the risk of flooding across the hillsides of the proposed development all running down to the Sarre Penn. The Sarre Penn itself joins the river Stour at the Wantsum Channel east of Canterbury. There is a risk of this flood water backing up to the Stodmarsh Nature Reserve.

**Crime impact assessment:**

**Policy DM7**

The current Police station in Canterbury is closed overnight. It is not clear in the Plan as to how the Police will cope with the planned huge increase in the population in Canterbury district. There is no Crime Impact Statement (CIS) in the Plan. It has not been thought through.

Signed.



Roger Wildman



