Alexander Gunyon

From: Rea Sen

 Sent:
 27 May 2024 11:34

 To:
 Consultations

Subject: Consultation for Canterbury District Local Plan to 2040 - policy C12 (The Blean)

Categories: Blue category

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To: Canterbury City Council Consultations

From: Rebecca Sellen,

Re: Consultation for Canterbury District Local Plan to 2040

I strongly object to policy C12 (The Blean) of the draft Local Plan to 2040 for the following reasons:

- 1) Site C12 is described in the Sustainability Assessment of the SLAA as a "car-dependent development", which seems likely even with the council's new proposed Bus policies. The 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.
- 2) All of the other surrounding roads are narrow, winding/hilly roads with records of speeding and accidents. The proposed development will be on both sides of Tyler Hill Road, but it says it will "minimise traffic flow onto Tyler Hill Road". It is unsafe.
- 3) 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.
- 4) 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 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". This is contradictory. C12 does not demonstrate that the conservation areas can be preserved, or that the impacts on heritage sites and their surroundings would be minimised. it would negatively affect the Church of St Cosmus and St Damian, which has traditionally been part of Blean village.
- 5) 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) say that it will continue to work with partners to extend and improve connectivity of the Blean Woodland Complex, but this development would making connectivity impossible.
- 6) The proposed development would mean the loss of large areas of "best and most versatile" Grade 2 and Grade 3 agricultural land (scored out of 5). The Local Plan includes a policy to protect the best quality agricultural land outside of urban and settlement boundaries.
- 7) The two access points for the 2,000 houses are both on Whitstable Road about 400m apart. One of them can only be created by Blean Primary School being demolished and rebuilt elsewhere on the site.

This is also a crazy waste of resources in the context of our environmental crisis. We can no longer afford to rip down buildings to build new ones, just because the council feels it needs to conform to government quotas. Blean Primary School is the only Outstanding primary school in this part of Kent and it will have a negative impact not only on the reputation of the school but on the pupils and staff.