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To:Consultations

Mon 27/05/2024 09:54

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To: Canterbury City Council Consultations

From: Benjamin Schwenn

Re: Consultation for Canterbury District Local Plan to 2040

I strongly object to policies W3 and W4 (Brooklands Farm) of the draft Local Plan to

2040 for the following reasons:

- 1. Loss of high-quality landscape with wonderful rural views of the distant Blean. CCC's Landscape Character Assessment 2020 recommended that CCC should reinforce the open rural setting south of Whitstable and resist development in the A299 New Thanet Way corridor.
- 2. This is not a sustainable place to build a large development, from which (if its like the rest of south Chestfield) more people would be commuting to Canterbury than any other destination, almost all of them by car. It will also contribute to traffic congestion in the north Canterbury area.
- 3. Increased flood risk downstream on the Swalecliffe Brook. At present heavy rain sits on the farmland before is slowly evaporates or trickles into the Brook. Vast areas of storage would be required to accommodate rainwater run-off from any urban development, but this could not be located close to the Brook because that area already floods when the river level rises over the riverbanks as happened in February.
- 4. Lack of health facilities. Local residents now find they can't secure an appointment with a local GP, and if they need hospital treatment their three-day stay in Margate's hospital is in the hospital corridor due to

lack of beds.

- 5. The local sewage works cannot cope with the increasing demand, and regularly releases untreated sewage into the sea, causing instances of serious illness for people on local beaches. The new outfall under construction will not solve this problem.
- 6. The proposed new junction linking the A299 to Chestfield Rd and South Street would have unacceptable adverse consequences for local people, road safety and pollution in residential areas.
- 7. Seriously negative impact on Biodiversity. There is a lot of insect life associated with the cattle of Brooklands Farm, and consequently there are swallows, house martins, wagtails, numerous bats and no doubt much more that is less easy to see. There is also wildlife on the arable fields, e.g. skylarks
- 8. Adverse effect on the Convicts Wood Local Wildlife Site. Building 1,400 houses nearby would cause it to be severely degraded and used as a children's recreation area and dog-walking route. Residents would use the area for dumping garden waste, as already happens in comparable areas along the Swalecliffe Brook. Residents' cats would kill off the local wildlife.
- 9. Loss of "Best and most versatile" agricultural land.
- 10. CCC needs to recognise that housing developments affect the coastal towns much more severely than Canterbury. Canterbury can expand to north, east, south and west. Whitstable can only expand southwards, as it is constrained by marshland to the west, and by Herne Bay to the east. What little farmland that remains within easy walking distance of Whitstable is needed for residents' recreation and well-being as well as to preserve the last vestiges of the natural setting of this tourist destination town. Therefore, the farmland between the Blean woodland and the existing urban edge of Whitstable should be given statutory protection.
- 11. For the reasons listed above, the proposals would be unsustainable and would contravene paragraphs 135c, 168, 173, 180b, 180d and 191b of the Government's National Planning Policy Framework.

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Mon 27/05/2024 11:09

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To: Canterbury City Council Consultations

From: Benjamin Schwenn

Re: Consultation for Canterbury District Local Plan to 2040-policy c12 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
- 8) The transportation of building materials will also have a big impact on the environment and natural resources.

(which as oil is in decline and the climate rises in temperature and weather patterns become more extreme and unpredictable, covering more natural land resources in concrete is only going to make things worse!)

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