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Response to the consultation on the draft Canterbury District Local Plan to 2040.

Chapter 1. Spatial Strategy for the district

Chapter 2: Canterbury

Policy C12: Land North of the University of Kent.

I object to proposal C12 (Land North of the University of Kent) in the Canterbury District Draft Local Plan 2040 on environmental, sustainability, and biodiversity grounds. This objection is based on the following key points:

1. The proposed development site falls within the Amery Court Farmland (E3) Landscape Character Area identified in the Canterbury Landscape Character and Biodiversity Appraisal 2020. This area is described as a "distinctive and rare landscape type" with a "strong rural character" and "high sensitivity to change." Developing this greenfield site would irreversibly damage this valued landscape. The appraisal provides guidance to "Maintain the essentially linear pattern of Blean and Tyler Hill villages avoiding further infilling or extensions that would create a greater urban extent." Permitting the development to proceed would contradict the guidance provided by the councils' own report. Council policy SS1 item 10 states that "The council will continue to work with partners to... support the extension and improved connectivity of the Blean Woodland Complex." Permitting the C12 development would render this impossible.

2. The Appraisal highlights the importance of the Amery Court Farmland for biodiversity, noting its "network of hedgerows, shelterbelts and small woodlands" which provide habitat connectivity. Development would fragment and degrade these habitats, negatively impacting biodiversity. Six of the hedgerows are designated as 'important' under the terms of the Hedgegrow Regulations 1997. The land is graded 2 or 3 and is "best and most versatile" and should be protected in accordance with policy DS12. "Outside of urban and settlement boundaries, the best quality agricultural land should be protected from loss through development other than in exceptional circumstances".

3. The University of Kent's Framework Masterplan aims to enhance biodiversity across its estate, which directly conflicts with allocating land for development on this ecologically valuable site. The Masterplan recognizes the environmental sensitivity of the area proposed for allocation. It also states that "The Sarre Penn Valley is a great asset to the campus in providing a green setting to the north of the University as well as a more rural landscape character, which is a major part of the University's attractiveness to students, academic staff and visitors to the University. The Sarre Penn Valley contributes to the University's reputation of a very verdant campus and offers an attractive alternative landscape character to University Rise. Similarly, the Sarre Penn Valley provides a punctuation in the landscape between the campus and the outlying villages of Blean and Tyler Hill".

4. Prioritizing development on this greenfield site over brownfield alternatives contradicts the Local Plan's stated objectives of protecting valued landscapes, enhancing biodiversity, and promoting sustainable development. Preserving this area would better align with these goals.

5. Traffic. Taking average statistics for car ownership a development of 1800 houses will result in 2340 more cars on Canterbury roads. The main routes into Canterbury from the north through Blean and Tyler Hill are already very busy at peak times. Traffic from the two sites to the north of Tyler Hill road will have to use Tyler Hill road despite the C12 requirement to “minimise traffic flow onto Tyler Hill road in both directions”. This is a narrow country land with several sharp blind bends and in places cannot easily be widened. There is also a crossing point for pedestrians and cyclists on the Crab and Winkle Way and national cycle network NCR1 with poor sight lines on/off the road. Traffic and street lighting will also contribute to light pollution further reducing the dark sky quality north of the city. The two access points to the site south of Tyler Hill road are onto Whitstable road. Both of these routes converge at a single point just north of the day nurse. One of the routes requires the demolition and relocation of Blean Primary School. The phasing of the development including the provisioning of the new school suggests that the school will be relocated into what is likely to be a building site for many years. What impact is this going to have on the education of the children and the health and safety of both staff and pupils?

6. Amenity. There are many PRoW across the sites. One of the Canterbury “Rings” and the Big Blean walk cross through the proposed development which will significantly detract from the amenity provided. The area is populated by many birds including common buzzards, kestrels, sparrowhawks and skylarks, the latter requiring ground cover for nesting.

7. Technical suitability. In the July 2022 SLAA the land in C12 was submitted as three separate sites, SLAA158 B, C & D. All 3 sites were deemed unsuitable. For all three sites there was concern over access to the site and for C&D access to day to day services requiring use of a private car. These latter concerns do not appear to have been addressed in C12.

8. Changes to the University designated boundary. The proposals map of the adopted local plan 2017 clearly shows that the University’s designated boundary includes the lands to the North of Parkwood road and the University playing fields up to Tyler Hill Road. Policy EMP7 states the types of development which would be supported by the City Council. These do not include a new rural settlement. EMP7 also stated that “Significant development proposals at the University will be subject to updating of the University’s Transport Impact Assessment and a review of the University Travel Plan”. These have not been produced in relation to C12.

In the FMP2019 the University identifies the land that forms the bulk of the proposed C12 development as (section 6.5) Landscape Character Area 4 Description: Sarre Penn Valley. This is stipulated as lying within the campus boundary. As such it should be covered by policy DS9 which again restricts the types of development that would be supported. It seems that the campus boundary is being redrawn in order to facilitate the C12 development.

In summary, allocating the Amery Court Farmland (E3) for development under proposal C12 poses an unacceptable risk to a rare, environmentally sensitive landscape and its biodiversity value. This conflicts with local and national policies promoting environmental protection and sustainable development. I urge the council to remove this allocation from the Local Plan.