

HARBLEDOWN and ROUGH COMMON PARISH COUNCIL

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Harbledown & Rough Common Parish Council's response to the Canterbury Draft Local Plan 2040

We welcome the aspirations for enhanced environmental protection and community well-being outlined in the introduction and the promise in **Vision for 2040** that 'Our important habitats and landscapes will be restored and enhanced, supporting the recovery of nature, improving environmental resilience and providing significant increases in biodiversity.' Equally, we welcome the emphasis the **Corporate Plan** places on 'protecting and enhancing the environment across the district', 'Protecting our district for future generations' and 'Growing our district sustainably'. However, these laudable objectives are, in the present Draft, too often undermined and contradicted by particular policies and strategic priorities.

The contradictions stem, in large part, from the Council's unwillingness to challenge the unrealistic housing allocation as well as its uncritical acceptance of the desirability of continued growth of the city's universities.

Housing target

We have been told by Canterbury City Council (CCC) officers that Canterbury has no case to be treated as an exception to the government-imposed housing allocation targets. We do not accept this. Canterbury is a small city with a mostly medieval street pattern, high proportion of heritage-listed buildings and a UNESCO World Heritage Site. It is surrounded by countryside and / or woodland which is of high landscape value and preserves some of the historic environmental context of the old city. Moreover, Canterbury has a centripetal pattern of approach roads, most of which have severely restricted capacity and a variety of infrastructural problems, as well as what is reputedly the highest ratio of students to permanent residents of any city in Europe. Taken together, these factors suggest that Canterbury has a very strong case to be an exception from the 'one-size-fits-all' national standard method of allocating housing. It is disturbing that the **Sustainability Appraisal 2024** should conclude (6.1.4) that the proposed housing growth option would entail negative impacts on air quality, geology, water quality, flood risk, waste, health and sustainable communities with significant negative impacts on heritage.

The Housing Secretary, Michael Gove, in December 2023 stated that the standard method is a 'starting point' and does not set a mandatory target for each district. Local authorities are permitted to put forward plans for fewer houses where exceptional circumstances exist and 'should do so for the good of the communities they serve'. It has been reported (*The Times*, 2 May 2024: 'Councils slash housebuilding plans') that 15 have cut their housebuilding targets by at least 10%, one (South Staffordshire) by 40%. As the very cogent ACRA Discussion Paper makes clear, for a combination of reasons, including demographic change and the standard model's reliance on outdated 2014 ONS population projections, the present targets considerably overstate Canterbury's housing requirements.

Movement and Transport

We share the concern about movement and transport (**Policy SS4**) to/from and within Canterbury city centre and the attendant congestion, air and noise pollution. However, the proposed strategy for sustainable transport – discouraging travel by private cars and encouraging more walking, cycling and bus use – is unsuitable for most residents of Rough Common as the village is situated on top of a very steep hill which makes it exceedingly difficult for all but the fully able-bodied to walk or cycle either to or from Canterbury. It is completely impractical to suggest that our residents could tackle this on a regular basis, especially in inclement weather.

CCC's suggested 'bus first' strategy is fine in theory, but Rough Common has seen its bus service completely removed and the frequency of the Whitstable Road service (4/400/401) reduced in recent weeks. Similarly, the bus service through Harbledown and Upper Harbledown has been made less reliable (and therefore less popular) by the replacement of the 3 service, terminating at Faversham, with the X3, terminating at Maidstone. A 'bus first' strategy is unlikely to serve the villages of the Parish sufficiently well to encourage residents to leave their cars at home unless bus services can be made frequent, reliable and inexpensive. There is no indication of how such conditions might be achieved.

Policy C12 – Land north of the University of Kent

Harbledown and Rough Common Parish Council strongly opposes Policy C12 and Policy SS4 - Movement and Transportation Strategy for the district. These policies would, if implemented, impose seriously damaging impacts upon the villages of this Parish. They would directly impact upon the health and well-being of the community, the environmental amenity of the parish, and would contradict the aspirations for environmental improvement outlined in the Plan.

We join with Blean and Hackington Parish Councils in objecting to **Policy C12** in general, for reasons that we detail in the Annexe to this letter, but here we highlight our objections relating to the most direct impacts of **Policy C12** upon the Parish: the traffic access and movement strategy associated with the proposed development for housing on land north of the University of Kent and the impact on the environmental amenity of the Parish.

We are extremely disappointed that CCC say that they listened to the last consultation in 2022 by removing Rough Common Road as a 'bypass' but nevertheless in the new Draft Local Plan 2040 propose a significant 'Settlement' to the north of Kent University (**Policy C12**). We are alarmed that facilitating the new settlement proposed in **C12** will entail devastating consequences for the villages of Rough Common, Harbledown and Upper Harbledown.

C12.4. Access and transportation. It is proposed to (d) Provide a **primary access point to the site at the junction of Whitstable Road and Rough Common Road** and secondary access to the site from Whitstable Road through land at Blean Primary School; (e) Provide **highways improvements to Rough Common Road**; and (f) Provide an **all-movement junction at A2 Harbledown through the provision of additional slip roads.**

The **Sustainability Assessment 2024** states (5.6.34) that ‘significant concerns regarding the impact on the highway network have been identified. This would require mitigation.’ But there is no indication of what such mitigation might be. CCC have failed to provide full and proper detailed plans regarding the access and transportation for direct delivery of development site C12, mentioned above, but have shown in the **Draft Infrastructure Delivery Plan** (p.33) that £25m has been allocated for the ‘All movement junction at Harbledown’ and £2m for the ‘Upgrades to Rough Common Road’ over a medium to long term timescale of 11-15 years. No details are provided of the proposed access to site C12 off Rough Common and Whitstable Road roundabout.

The Parish Council is dismayed by the lack of detail in the documentation and questioned CCC planners at the consultation evening at Blean Village Hall on Tuesday 30th April 2024. Parish councillors were verbally told that a transport assessment has “not yet been completed” and that “there are drawings of the slip roads but that they are unavailable until after the consultation deadline.” **This is unacceptable** and makes it impossible for the Parish Council to comment fully on these plans.

We were verbally told that the ‘improvements’ for Rough Common Road would involve:

1. Re-surfacing the road
2. An extra zebra crossing

Both of which we would welcome for the village.

But also;

3. Removal of the existing parking bays
4. Reinforcing the road in order to remove the existing weight restrictions

Proposals 3 and 4 are indications that CCC expects Rough Common Road to be a major arterial road or, essentially, a bypass.

In the **Vision for the District to 2040**, CCC states: ‘Improved connectivity, High-quality public transport infrastructure, comprehensive walking and cycling networks and accessible community facilities will help to improve air quality, respond to the challenges of climate change and enhance the quality of life for our residents.’ This completely contradicts what is planned for the villages of Harbledown and Rough Common. In the **Draft Infrastructure Delivery Plan** (p.13), point 9.10 says that “Development at Land to the north of University of Kent, will require a new coast-bound on-slip and London-bound off-slip at the A2 Harbledown junction, together with associated upgrades to Rough Common Road. The addition of these slip roads will create an all-movement junction at Harbledown and will allow traffic to access the new settlement from the strategic road network, without travelling through the city centre.”

This again proves that CCC clearly expect that traffic, including construction vehicles, will use Rough Common Road as the principal access route between the new settlement proposed in C12 and the A2. This will have a devastating impact on our community and will do the exact opposite of what is stated in the **Vision for the District**. Rough Common is a village with a population of around one thousand people, many of whom live on Rough Common Road. The road is currently a major walking route for children attending Blean Primary school and Rough Common Pre-School. Turning Rough Common Road into a major arterial

road will make it substantially more dangerous, cause significant traffic noise, light and air pollution, impose planning blight upon homeowners, destroy the character of the village, and ruin the quality of life for our residents.

Harbledown and Rough Common Parish Council appeal to CCC to **remove Policy C12 from the Draft Local Plan** and thereby **remove the need for the ‘improvements’ to Rough Common Road and the access to the site near the Rough Common – Whitstable Road roundabout**. In the absence of any details of the design or precise location of the proposed all-movement junction at Harbledown, we are unable to assess its impact upon residents of the Parish and, unless and until such details are made available to us, **we strongly oppose the development of the proposed junction**.

Our objections to Policy C12 are by no means limited to its implications for transport movements in and through the Parish. We also strongly object to Policy C12 because of its significantly negative impacts on the environmental amenity of the Parish and its context in the Blean Woods complex.

It is because we value our rural environment, its woodlands and open countryside that we welcome the ambition of CCC to seek 20% biodiversity net gain and a minimum of 20% tree cover for all new development. For that reason, we are strongly opposed to Policy C12. Policy C12 would, if implemented, directly contradict and undermine the main thrust of other Policy goals, notably DS19 (Habitats, landscapes and sites of local Importance), DS21 (supporting biodiversity recovery), DS22 (Landscape character – especially c, d and g), DS23 (Blean Woodland Complex), DS26 (Historic environment and archaeology), and DM18 (light pollution and dark skies).

Residents of the Parish value and enjoy the existing natural environment of the lands embraced by Policy C12. We are dismayed by the prospect of a significant change in the character and use of those lands, the consequent loss of existing biodiversity, agricultural land, and the context and detail of this singularly important site of historical, archaeological and ecological significance. All of these are of great concern to us, but we draw particular attention to the negative impacts of Policy C12 upon the network of woodlands and PRoWs.

The most used and enjoyed PRoW affected is the bridleway that runs north from Whitstable Road through the whole length of the site. This bridleway also serves as part of National Cycle Route 1 and the start of the Crab and Winkle Way. It has considerable amenity value for the residents of the Parish. It passes through several Conservation Areas and sites of historical and archaeological significance, including the Old Salt Way, and borders pockets of ancient woodland. It is particularly important because it provides the only readily accessible all-weather path /cycleway into and through tranquil open countryside that is relatively remote from the noise of road traffic. It therefore deserves special protection. The urbanisation of this landscape would destroy its amenity value, make biodiversity recovery more difficult and prevent improvement of the connectivity of the Blean Woodland Complex.

The particularly attractive part of the Crab and Winkle Way PRoW from Whitstable Road up to The Oaks Day Nursery and Blean School is the most popular section of this PRoW, used by

children and their parents enroute to and from the school, by walkers, joggers and cyclists, including those heading to and from the University campus and the Church of St Damien and St Cosmus in the Blean. Driving a new road through this area and bordering it with new housing and commercial buildings would severely diminish the amenity of this much-valued PRow.

For all these reasons, **we STRONGLY OPPOSE Policy C12.**

Annexe to letter from Harbledown and Rough Common Parish Council in Response to Canterbury Draft Local Plan 2040

The introduction and consultation (p.3, col.2) states that, based on Issues consultation in 2020 and our Draft District Vision and Local Plan Options consultation in 2021, ‘residents, businesses and other stakeholders felt need to be addressed in the new local plan:

tackling congestion and air quality
providing high quality affordable housing
improving access to community infrastructure
protecting our valued landscapes, open spaces, habitats and heritage
facilitating a significant shift towards net-zero.’

We share all these concerns, and we welcome the emphasis the **Corporate Plan** places on ‘Protecting and enhancing the environment across the district’, ‘Protecting our district for future generations’ and ‘Growing our district sustainably’.

Vision for 2040

We warmly welcome the aspiration in the Plan for ‘**A thriving environment**’:

‘Significant new areas of accessible, high-quality open space will be created across the district and both new and existing valued open spaces enjoyed by the district’s residents will be protected for future generations, ensuring continued access beyond the period of the plan.

Our important habitats and landscapes will be restored and enhanced, supporting the recovery of nature, improving environmental resilience and providing significant increases in biodiversity.

Opportunities for nature-based responses to climate change and other environmental challenges will be maximised and our urban areas will be greener and healthier.’

We applaud this vision but are dismayed that it is undermined by particular elements of the **Strategic objectives for the district**. In particular, **there is a contradiction between aims to promote biodiversity, action to mitigate climate change, and to extend protections to Blean Woods, on the one hand, and Policy C12 on the other.**

Twelve **Strategic objectives for the district** are listed, but the ordering of them implies a hierarchy in which the economy is prioritised above the environment and the health and well-being of residents and communities. Even ‘our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life’ are things to ‘capitalise on’ for economic reasons rather than to celebrate for residents.

Thus, listed only 6th and 5th respectively, are:

‘Protect and enhance our rich environment and valued landscapes, creating a network of green spaces, protecting and enhancing green gaps between settlements, supporting nature’s recovery and biodiversity and improving the health and wellbeing of our communities.’

And

‘Reduce the causes of climate change and adapt to ensure all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.’

Although the objective to ‘Create a thriving economy with a wide range of jobs to support increased prosperity for all throughout the district’ is unimpeachable, the second listed objective is more problematic:

‘Support the growth and development of our universities and colleges as a centre of innovation and learning excellence’.

For the purposes of the present Plan, the impact of **the continued growth of the universities upon the City and its environs should be critically assessed**. Clearly the universities have delivered some cultural and economic benefits to the district, despite the withdrawal of adult education opportunities. Nevertheless, with the present very high density of students in the population and the burdens of providing for them, the universities appear to have outgrown their ecological niche and to be degrading the well-being of the city and its residents (hence the declining population of Canterbury city). Canterbury has become overly dominated by a single economic sector and as a result its economy lacks resilience. This will not be remedied by the further growth of universities that do not primarily serve local needs, do not require their students or staff to live within the district, and whose procurement policies favour non-local contractors.

In general, we welcome the **Environmental strategy for the district** (p.11) and **Policy SS1**, especially

its recognition (1.18) that the district ‘benefits from a range of important habitats and landscapes which provide an invaluable network of green and blue infrastructure for wildlife, establishes the high-quality rural character of the district and contributes significantly to the quality of life for residents’.

It is laudable that (1.24) ‘the Local Plan provides new opportunities to improve biodiversity and the connectivity of our habitats and deliver significant new areas of open spaces which are accessible by our communities - improving access to nature and supporting health and wellbeing’.

Also laudable is the objective (1.25) to ‘enhance the district’s natural environment’, as is the recognition that ‘1.26 The district’s heritage assets are highly sensitive to change’ and that the Council is committed to ‘protecting and, where possible, enhancing the historic environment for future generations’.

However, it is important to highlight that these are valuable in their own right and not merely as contributors to the economy. It is imperative that any new developments should contribute positively to these objectives.

We also applaud the Council’s intention ‘to support the extension and improved connectivity of the Blean Woodland Complex’

Policy SS2 - Sustainable design strategy for the district

We welcome:

‘6. High quality, accessible open space should be delivered in line with Policy DS24, and be incorporated into proposals with appropriate layouts, sizes and distances from highways to promote healthy lifestyles’ and, especially,

‘(d) natural and semi-natural greenspaces connecting communities to nature by supporting wildlife conservation, biodiversity and environmental education and awareness and spaces providing opportunities for informal recreation by the whole community’.

We would add that, where we already enjoy such amenities, their protection should be the highest priority.

Development Strategy for the district

We are puzzled by

‘1.44 Taking account of the responses to previous consultations, the plan also identifies land for a new settlement to the north of Canterbury.’ We are not aware that this was a product of any public consultation; rather, the only comments on proposals for possible change of use to land north of the University in previous consultations were negative because of the environmental harms it would entail.

Indeed, 1.44 is immediately contradicted by 1.45: ‘In planning positively to meet the growth needs of the district, the strategy seeks to protect the countryside and the rural character of the district from inappropriate development’.

As we shall argue in our critique of Policy C12, the proposed ‘new settlement to the north of Canterbury’ is precisely the kind of inappropriate development against which the strategy purports to protect.

Policy SS3 - Development Strategy for the district

‘2. Canterbury Urban Area will be the principal focus for development in the district. New development will be supported on suitable sites within the urban area.’ Yet in the next paragraph but one, we learn that ‘A new rural settlement is planned for land north of the University of Kent campus, north of Canterbury, which will provide new homes, jobs, services and infrastructure.’

The inclusion of this makes a nonsense of the whole section. It is revealing that this ‘new rural settlement’ is included in a section devoted to the ‘Canterbury Urban Area’. It is clear that this would not be ‘a new rural settlement’ but an extension of the urban area of Canterbury immediately adjoining the already urbanised space of the University of Kent campus.

Furthermore, it would clearly negatively impact upon the rural character of the villages of Blean, Tyler Hill and Rough Common (which are to be protected – see paras. 4 and 5) as well as on the present rural character of the site in question (see para. 6).

Policy SS4 - Movement and Transportation Strategy

Whilst we are in general supportive of the provision of sustainable transport infrastructure, we are sceptical of the assumption that a bus-led strategy will greatly displace private cars, particularly because many of the journeys to work that originate in the Parish are to destinations that cannot conveniently or reliably be made by public transport. A bus-first strategy might work for journeys that terminate in central Canterbury, but it is less likely to work for journeys which would require a change of bus at Canterbury station or other central hub.

A successful bus-led strategy requires bus services that are frequent, reliable and inexpensive for users. However, in order to be inexpensive for users, bus (or substitute on-demand) services will require a level of subsidy that would appear unlikely given the present state of public finances.

Whilst we support some measures that might improve the flow of buses, we have serious misgivings about the reallocation of road space to the permanent, exclusive use of buses. Whilst we understand and accept the need for bus-only lanes at peak hours, more flexible provision that would permit other road users to use bus lanes outside those peak hours would better serve the community and expedite travel within and across the district.

We support the development of safe, spatially segregated cycle lanes, but as the Transportation Strategy itself acknowledges, this is unlikely to greatly increase the presently small proportion of residents who travel by cycle.

Policy C12 - Land north of the University of Kent

We strongly object to Policy C12.

The proposed development would not be a 'new rural settlement' (2.15) because it is directly adjacent to the urbanised UoK campus. Given its close proximity to Blean and Tyler Hill, as well as the University, it is not likely that it would in practice be 'a highly sustainable, freestanding settlement'. Since it is proposed that the new settlement would be served by an extension of the bus service that presently serves UoK, it would be demonstrably an annexe of the University and dependent on the University for its access to the bus network. Moreover, the roads over which such buses would travel – University Road and Parkwood Road – are private roads on the university campus and University Road is subject to periodic closures in order to preserve its status as a private road.

It is implausible that a 'linear' development such as is proposed (2.17) will produce 'improved ecological connectivity to key natural assets in the area, including Blean Woods'. On the contrary, it is highly likely that such a development will disrupt such ecological connectivity as presently exists and will make the achievement of the improved connectivity of the fragmented Blean woodlands envisaged in **Policy SS1** practically impossible.

The provision of a new primary school on the site of Blean primary school and / or the relocation of the existing school (2.18) is potentially highly disruptive of an 'outstanding' village school.

It is unclear for whom the proposed housing provision (2.19) is intended. The **Strategic Land Availability Assessment** (2022) found that it 'would be a large-scale car-dependent development. More traffic could cause significant negative impacts on the highway network'. It would indeed be a 'car-dependent' development, given the degree of dependence of existing peripheral / rural settlements upon private cars. It is unlikely, given the impediments to the timely flow of buses (lower end of Whitstable Road, St Dunstan's level crossing) that a bus service to Canterbury West would be sufficiently fast or reliable to meet the needs of commuters.

C12.1. Development mix. We will not comment on this because it appears highly speculative, particularly with regards to the provision of commercial and office and business space.

C12.2. Design and layout. We are sceptical that it will be possible, on this site, to produce 'a complete, compact and well-connected neighbourhood, where every day needs can be met within a 15 minute walk or short cycle' (2 b). Such a development will be highly dependent on facilities (pharmacy and other medical services, speciality shops, secondary schools) that are more distant from the site and, in many cases, already overloaded; opportunities for employment are also likely to be more distant, often considerably more distant.

Whilst **C12.2f** acknowledges the existence of heritage assets and Conservation Areas within and adjacent to the site, it is not reassuring that these are yet to be assessed; nor is there any indication of how impacts of development upon them may be mitigated. It is known that there are archaeological features, some already listed / scheduled, and some, notably tile-kilns and burial sites, yet to be fully explored. The scant detail in the site map gives no confidence that these have been or will be given the consideration they deserve.

C12.3. Landscape and green infrastructure

a.) Whilst 'a comprehensive, coordinated and multi-scale sustainable urban drainage network' would be essential to such a development, we are sceptical that it is achievable on this site given the difficult geology of the site (hard clay soils that become saturated in winter and desiccated in summer such that they do not readily absorb rainfall, particularly during the kinds of extreme rainfall events that become ever more likely with a warming climate). This is compounded by the increased area of non-porous surfaces that would inevitably be associated with new roads, housing, carparks and commercial activities. We are particularly concerned about the possible negative impacts on the Sarre Penn and its ecology.

b. 'Provide 20% biodiversity net gain, in line with Policy DS21'. Whilst this is a laudable ambition, it is difficult to see how it could be achieved whilst at the same time building over a large part of the site and so *reducing* the extent of existing biodiversity on the site and its immediate environs.

d. 'Retain substantial areas of the existing tree cover and incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Areas F2: Stour Valley Slopes and E3'. 'Substantial' is an elastic word, and we have no confidence, based on experience of previous developments in and around the University, that any compensatory planting to replace trees lost would be sufficient to preserve the landscape quality or biodiversity. We suggest that *all* existing tree cover and hedgerows should be retained, in addition to the requirement to enhance landscape and biodiversity, but we do not believe that this could, in practice, be achieved with the development as proposed.

e. The maintenance of the green buffer around Blean and the minimisation of adverse impacts on the Blean Conservation Area are *essential*.

f. It is difficult to see how effective green corridors 'including enhancements to the potential habitat connectivity' can be compatible with a development that will traverse the site with new roads and an increase in human intrusion on the natural landscape.

g. 'Minimise and where necessary mitigate damage to the Blean and Rough Common Green Gap through the provision of the primary access'. This is self-contradictory because the proposed 'primary access' to the site runs directly through the Green Gap and part of the Blean Conservation Area and would severely impact the environment of several listed buildings and the Hothe Court Conservation Area.

h). 'Minimise loss of or damage to ancient woodland at "Long Thin Wood" through the provision of the primary access.' Again, it is inconceivable that the existing woodland will not be impacted by the 'primary access' as proposed, nor that protection would be extended to 'all other ancient woodland and ancient or veteran trees, ensuring they are not damaged nor is their future retention threatened'. The development would inevitably damage such trees and their rural environment by exposing them to closer proximity with urbanised land uses.

i). 'Ensure that development does not adversely affect the landscape, ecology or setting of the Blean Woodland Complex, in line with Policy DS23'. The development would utterly transform the landscape, ecology and setting of the Blean Woodland Complex and so directly contradicts the aims and ambitions of Policy DS23.

j). 'Enhance biodiversity interest from watercourses, and conserve, enhance and create neutral grassland, heathland and deciduous woodland, where appropriate. Expand and enhance fragmented areas of woodland to improve connectivity.' All these are highly desirable and should be undertaken in any case, but the development as proposed will make the achievement of these laudable aims impossible to achieve. Once again, the details of Policy C12 are contradicted by the headline aim of developing housing, other buildings and roads on this site.

k). 'Conserve and enhance historic field patterns and features, including the earthworks at St Cosmus and Damian church (Scheduled Monument) and other isolated boundaries and features representing the Medieval landscape pattern.' These are essential, but since the

existing patterns and features are extensive and cover much of the site, this laudable ambition is simply not compatible with a development of the size and scale proposed in Policy C12.

l) 'Conserve the PRoW network across the site ensuring key views from the network are protected'. Again this is essential, but because PRoWs traverse the site in multiple places, this laudable conservation objective is simply incompatible with a development such as that proposed; Policy C12 would inevitably entail considerable physical and visual intrusion by roads and new buildings. Moreover, ensuring that the network provides 'multiple benefits' will be difficult to reconcile with the requirements of a 'green ecological corridor'; for many species, a green ecological corridor would require *minimising* the intrusion of humans and so would imply the provision of corridors much wider than those presently envisaged.

In short, while all the aims listed in this section are laudable, if taken seriously they would preclude a development of the kind proposed for this site in Policy C12; effectively, the difficulty or impossibility of achieving all these aims provides compelling reasons for rejecting Policy C12, which appears to be in contradiction of the main thrust of:

Policy DS20 - Flood risk and sustainable drainage (potential impacts of surface and treated water on the Sarre Penn and the proposed Broad Oak Reservoir – cf. Policy DM16.4);

Policy DS21 - Supporting biodiversity recovery (it would threaten existing biodiversity);

Policy DS22 - Landscape character (particularly in respect of 2c. PRoWs, 2d. natural, semi-natural, historic and cultural features, 2e. harm to/ failure to enhance landscape, 2f. impacts on landscape context of the historic city, and 2g. impact on and failure to enhance rural tranquillity);

Policy DS23 (protecting and re-connecting the Blean Woods complex – C12 would directly frustrate Policy DS23); and

Policy DS26 - Historic environment and archaeology (impact on the site and its wider, historic context, on listed / scheduled monuments / buildings and on areas known to be of archaeological significance but yet to be fully investigated).

C12.4. Access and transportation

We welcome improved provision for safe and convenient pedestrian and cycle movement, and improvements at Canterbury West.

But we consider the proposal for primary and secondary access to the site (C12.4 d.) to be wholly objectionable. The primary access at the junction of Whitstable Road and Rough Common Road would compromise the Green Gap, drive a new road through this part of the Blean Conservation Area, entailing the removal of a number of attractive mature trees, and would have significant negative impacts on neighbouring heritage-listed buildings and on the PRoW (the Crab and Winkle Way) that runs north from Whitstable Road.

In the absence of any clear justification or design details, we also **STRONGLY OPPOSE C12 4(f), 'an all-movement junction at A2 Harbledown through the provision of additional slip roads' and 4 (e) 'highways improvements to Rough Common Road'**. If Policy C12 were to be implemented, we anticipate that Rough Common Road, which is presently subject to a weight restriction, and which terminates in a steep and winding descent at Palmers Cross

Hill, would become the main access route to and from the development site, both during the years of construction and subsequently. This would have severe negative impacts upon the health and well-being of the residents of Rough Common.

Appraisals and Assessments

The **Strategic Land Availability Assessment** (2022) considered but did not allocate any of the land now proposed for development in Policy C12. The reasons for not allocating this land (Development Topic Paper Appendix B) highlighted concerns regarding landscape impact, heritage and ecology concerns, lack of adequate access to the site, and the likelihood that future occupiers would, in an area with only limited access to public transport, be dependent upon private cars. Nothing in Policy C12 suffices to mitigate these concerns.

The appraisal of the site allocations undertaken by CCC officers for the **Strategic Assessment 2024** (4.3.13) concedes that: ‘Significant negative effects were assessed for biodiversity (SA Objective 3). The location includes Ancient Woodland and is within 400m of Blean Complex Special Area of Conservation (SAC), West Blean and Thornden Woods Site of Special Scientific Interest (SSSI), Church Woods SSSI and Blean Woods National Nature Reserve (NNR). Blean Pastures Local Wildlife (LWS) is also located within the site.’ (5.6.35). Significant negative effects were also assessed for landscape (5.6.36) and the historic environment (5.6.37). We are told: ‘These effects will need to be minimised and mitigated.’ It is extremely difficult to imagine how such wide-ranging and fundamental impacts could be mitigated; the best and simplest way of minimising them is to abandon Policy C12.

The **Landscape Character and Biodiversity Appraisal 2020** recommended The Blean Woodland Complex as a “Biodiversity Opportunity Area (BOA).” It recommended action “To maintain, restore, enhance and create woodland and grassland habitat, as part of the woodland and grassland habitat network of the Blean BOA.”; “Maintain the existing narrow single line of development associated with Blean and Tyler Hill villages avoiding backland encroaching towards the woods and maintaining views through gaps in development to the woodland edge.”

Discussing the Sarre Penn Valley, the Appraisal made many recommendations for protection and conservation, including:

“Conserve the open landscape and avoid the further introduction of large scale or incongruous elements, particularly where they are visible over ridgelines and from the Stour valley to the south.”

“Maintain the limited vehicular access to retain rural character and resist proposals for upgrading of tracks and lanes within the area.”

“Maintain the essentially undeveloped character of the area limited to occasional farm buildings.”

The **Draft Canterbury Tree and Woodland Strategy Consultation 2022** set out a Vision to be achieved by 2045, recommending that:

“The wider Blean complex will be a showcase for Southeast England for innovative rewilding and restoration of ecological functioning woodland. Partners, planners and landowners will

be working together to maximise the landscape and biodiversity benefits of woodland at this unique scale.”

and

“The woodlands of The Blean could be expanded to form an even larger continuous block of woodland. There are numerous small and fragmented woodlands in this area, including some isolated and small remaining ancient woodlands.”

In the Canterbury Draft Local Plan 2040, these recommendations are reflected in Policies DS21, DS22 and DS23. They are wholly incompatible with Policy C12.

Ironically, the University’s own **Framework Master Plan** (2019), which ‘is recognised formally within the Council’s local planning policy framework, specifically under Policy EMP7 of the Canterbury Local Plan’ (<https://www.kent.ac.uk/masterplan>), celebrates the landscapes and woodlands of the University’s northern lands and the Sarre Penn Valley as assets to the University and its sense of place; it does not propose any development on those lands. It does, however, propose the restoration of the hedgerows that have been become derelict during the University’s ownership of the land.

The **Sustainability appraisal of strategic land availability assessment 2022** concluded that, in relation to the University land, there were “significant and minor negative impacts and when reviewed alongside the SLAA there are concerns that these impacts cannot be suitably addressed”.

Yet the **Sustainability Assessment 2024** concludes (5.6.61): ‘While the site specific SA has identified significant and minor negative impacts, when reviewed alongside the SLAA, on the balance of positive and negative impacts and considering possible mitigation and design, it is considered that the majority of these impacts can be addressed through further refinement (and some uncertainty is still required to overcome with regards to the Blean Complex SAC).’

In short, when considered against CCC’s desperation to meet an arbitrary, formula-based housing allocation target, the many negative impacts of Policy C12, which are conceded in the Sustainability Assessment of the site, are reduced to matters that can or might be addressed through unspecified ‘further refinement’.

However, as the **Independent Review: Canterbury District Local Plan 2040 – Sustainability Appraisal and Strategic Environmental Assessment** (May 2024) by Dr Rufus Howard (Greenfriars) makes clear, nothing has changed that would enable a professional sustainability assessment to reach different conclusions in 2024 to those reached in 2022.

Dr Howard’s report concludes that:

“there is clear evidence within the SA that the proposed [new settlement on] Land north of the University is unsustainable and will generate multiple significant negative effects contrary to the majority of the Sustainability Objectives and in direct contravention of the stated Vision for the Local Plan.

“The Sustainability Appraisal and environmental assessment results clearly identify that the [new settlement on] Land north of the University of Kent will result in significant negative effects, and significant adverse impacts, on biodiversity, geology, landscape, water, heritage, land use and transport. This report finds sufficient supporting evidence to

conclude that a new settlement on Land north of the University (C12) is contrary to the principles of sustainable development and the avoidance of significant adverse effects and harm set out in the National Planning Policy Framework (NPPF).

“Furthermore, it is evident that the SA carried out lacks a proper consideration of alternatives and that the information relied upon is not justified, reasonable, sound or appropriate based on the evidence presented. There is a wealth of evidence attesting to likely negative effects and an absence of evidence to support the assertions of positive effects.” (pp.50-51).

It appears that the major change between 2022 and 2024 is the intensity of the lobbying of CCC and KCC by the University and its estate agents. Thus, the **Sustainability Assessment 2024** (5.6.64): ‘The site promoters have actively been engaging with the Council and other parties, and as such have provided evidence in regard to suitable access and possible transport mitigation, assessment of impact on ancient woodland and, at this stage, stakeholders and statutory consultees have not identified any major issues.’

Those words were written in February 2024. Harbledown and Rough Common Parish Council is a statutory consultee. We had not then been consulted, and we were not consulted before the Draft Local Plan went out for public consultation.

Conclusion

Harbledown & Rough Common Parish Council have identified numerous major issues with Policies C12 and SS4. These issues can only be satisfactorily addressed by the removal of Policy C12 from the Draft Local Plan.

On behalf of Harbledown and Rough Common Parish Council

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