

Amy Byrne

To whom it may concern,

I am writing as a very concerned resident of Rough Common regarding the plan for 2,000 houses in the area. I will outline all the reasons for my concern below.

Firstly the many strategic issues with this proposed plan. It is twice the size of the central walled city of Canterbury, to be built on greenfield sites and ruin three villages. Assessments of this land carried out previously have found it unsuitable for housing development for several reasons, the most recent Strategic Land Availability Assessment from December 2023 says there would be “ significant negative effects on biodiversity, geology, landscape, water, historic environment (site contains a scheduled ancient monument and is adjacent to grade 2* and grade 2 listed buildings, which likely impacts on the heritage assets and/or their setting) and land use (site is a greenfield over 3ha)”.

The ‘possible mitigations’ which the SLAA have said could be done are so demanding that they are unlikely to be achieved.

- The site is within the Green Gap and would lead to settlement coalescence, due to the size of the site, character of the area including projection into the open countryside, isolated location separate from the urban area/settlement, and existing views, development would have a significant adverse impact on the surrounding open countryside.
- There are significant heritage sites and conservation areas all around the proposed development area, protected by national planning laws.
- The site is over 100 hectares and is grade 3 agricultural land that is currently used for grazing and arable crops.
- It would be a large-scale car-dependent development, regardless of any additional buses which may be planned, and the surrounding roads are not capable of accommodating the increased traffic with some narrow country roads also affected, with junctions having had many incidents.
- The previous local plan to 2024 included a western bypass as a proposed way to expand local road capacity as the local council recognises that local roads in north Canterbury are already at their limits, this bypass has now been removed from the local plan with no alternative suggestion for how 2000 additional households with cars could get around the city.
- The loss of such a large, well-used and significant open space cannot be adequately “reprovided” within the site, it is a huge local asset and amenity, no amount of mitigation or substitution could replace it.
- Flood risk is given a positive assessment in the latest SLAA, however I don’t believe this is correct. The majority of the site is London Clay so not free-draining and liable to flooding. Planning advisors say it may be virtually impossible to mitigate against surface flooding. Councils across the UK are increasingly facing flash-flooding compensation claims from residents and businesses for poor flood planning.

- It also says on the report that there are “no biodiversity evidence” which is incorrect as there is in fact significant biodiversity evidence with multiple protected species being sighted, studied and mapped on national data sets.
- The impact on Blean school would be detrimental, it is the best primary school in the area and it being closed or disrupted and being next to a building site for up to 10 years would have huge impacts.

This proposed development would increase the current population which is around 3,700 across three villages to around 10,000. Along with this comes all the associated pressures on traffic, GPs, hospitals, waste management and water supply. The number of houses that needs to be built in each area are based on figures produced by the Office for National Statistics, The Alliance of Canterbury Residents' Associations has concerns around the districts failure to use the latest population projections, and have already urged the council to plead Canterbury's case for exceptional circumstances due to a falling population in the district, therefore, despite the National Housing Strategy to build 300,000 new homes, we do not need these in Canterbury. If you do argue that the houses are needed then why were large portions of previous developments around Canterbury sold to London boroughs? Clearly we are not in need of housing for local people so it should not go ahead.

The Blean area is an area of ancient woodland, farmland and heritage sites. The area that is being proposed to be built on is Grade 2 & 3 'best and most versatile' farmland. The plan proposed involves the destruction of more than 100 hectares of agricultural land which is used for a mixture of livestock grazing and arable crops. The UK is currently facing huge impacts to its food supply, driven by climate change, supply chain disruption and global trade, we need to be producing more food in the UK and not less, we should not be building on some of our best agricultural land, it needs to be protected and enhanced to secure UK food security. National government is beginning to write this into Food and Land-use strategy and Local Planning Policy is expected to evolve to include this too. As well as houses being built on a huge area of agricultural land the proposed development would have a detrimental impact on Amery Court Fruit Farm, this is a long-established and successful farm between Blean and Tyler Hill. Fruit farms already have to manage multiple challenges including theft and vandalism, a new large population on the doorstep of this farm would pose a threat to their ability to operate and remain a viable and successful business. The University of Kent recently committed to being a Right to Food university: “In adopting this basic human right, we commit ourselves to promote food justice, tackle food poverty and transform our food system so that it operates to advance human health and environmentally sustainable society”, this plan goes directly against that.

The site is also immediately next to multiple conservation areas, heritage and listed buildings and scheduled monuments. It would also be directly built on a known Iron Age settlement which was revealed by a magnetic survey; there is also another site nearby which could potentially be a small Roman building. The University of Kent Archaeology Department completed a dig in September 2020 in which they discovered “a scatter of tools left by hunters of the Mesolithic (9000 to 4300 BC) a series of Bronze Age burial mounds (marked by ring ditches), and a massive medieval enclosure ditch, related to the adjacent Blean Manor House, which is mentioned in the Domesday Book. There is also evidence of tile production, an industry that served Canterbury from this site on 'Tyler Hill Road'.” The site now stands out in the district for being a centre of sacrality, from its burial mounds to the St Cosmus and St Damian Church which was built in 1233.

The area is already suffering from poor drainage and regularly floods, how is covering the area with concrete going to help this? Only 18 months ago the Strategic Land Availability Assessment deemed this land unsuitable for residential development as “suitable access to the site has not been demonstrated to be achievable due to heritage and ecology concerns”. It appears that all of a sudden this is no longer the case, why? It seems like this is a profit-making scheme to the detriment of the local community and environment.

Rough common road is not designed for the amount of increased traffic that will be introduced to the area. And you may say there will be plans for public transport links, however, we all know that this is not going to happen, people will still have cars and choose to use them, until the public transport system of the county is improved a huge amount of people are not giving up their cars, buses have been cut in the area recently, not increased which reduces people's confidence in public transport and less likely to rely on it. The most recent SLAA states (even with additional buses planned): “This would be a large-scale car-dependent development. More traffic could cause significant negative impacts on the highway network”. This proposed development would make Whitstable Road and Rough Common Road into major access roads, which they are not designed for. Whitstable road, closer to the city centre, is already a busy residential area with traffic calming measures and limited parking. Rough Common would presumably need to be widened, what about the impact on residents and on Blean Woods Nature Reserve? Tyler Hill Road is a narrow county road whose junction already has had several incidents, this will become a cut-through causing even more problems. Hackington Road, Radfall Road and Thornden Wood Road would also become major routes towards the coast, also roads not designed for this, it would increase road-kill around the Clowes Wood area and the ancient woodlands near the Bison rewilding project.

Less than a year ago, on 19th October 2023, Canterbury City Council unanimously voted to declare a Biodiversity Emergency. A Canterbury District Biodiversity Plan and Nature Recovery Strategy is due to be launched early summer 2024, how does this relate to the proposed development? The area proposed is rich in biodiversity and I am very concerned about all the wildlife here. The Strategic Land Availability Assessment carried out in December last year failed to note the large amount of biodiversity that needs to be protected in the area, is the council actually aware of the extent of the biodiversity that is at stake? Over 60 species of birds have been recorded in the area in the last year alone, including rare sightings of honey buzzards and black kites. Other birds which live in the area are fire crests, linnets, gold crests, tawny owls, kestrels, buzzards, kingfishers, sparrow hawks, skylarks, yellow hammers, stonechats, nightingales, siskins, redwings. Some of these are on the RSPB Red List of species that have either suffered severe declines or are threatened with global extinction. How can their habitat be proposed as a new development? There are also a number of mammals in the area, brown long-eared bats and pipistrelle bats roost here and hunt in the woods, meadows and along the stream. They are also protected because their habitats are so endangered. How can their habitat then be seriously considered for this development? There are also hedgehogs, badgers, foxes, field mice, rabbits, bank voles, weasels and grey squirrels which live in the area. Then there are also many reptiles and amphibians including great crested newts, which are a protected species, found to be living on the proposed site, along with smooth newts, alpine newts, palmate newts, frogs, toads, slow worms and barred grass snakes. There are also internationally recognised experimental ponds for great crested newts on the university site, close to the proposed access points. The area of Sarre Penn stream, ancient woodlands and native hedgerows are all important habitats for these creatures, it is also home to rare native plants such as yellow gentians and loose flower orchids. Blean is an identified ‘Biodiversity Opportunity Area’ in the Kent Wildlife Strategy, the area between Blean and Tyler Hill is an important wildlife corridor. The urbanisation of these green fields between Blean and Tyler Hill would sever the wildlife corridor between East and West Blean

Woods and it would also permanently remove the option of further rewilding and biodiversity gain in this area. How can this even be considered? Wild animals and rare plants can't cope with living next to large populations with light pollution, deadly cars and noise. They rightly don't like their habitats being destroyed, they will either die or leave and never return.

I am also extremely concerned about Blean school. The school is the best school in the area and demolishing it would be an absolute travesty. Would the school be given the same amount of green space it currently has for the students? Will this be increased due to the increased numbers of students? There are also plans to have two primary schools on the site, what effect will this have on education in the area? How would resources, teachers, pupils be allocated between these schools? This development is going to take years, how is it going to affect pupils and teachers to be on a building site for up to 10 years? How is this safe? Students will not be able to walk to school due to safety issues. And it is completely appalling that the school were not even consulted about this plan before it went public, that alone does not give any confidence that the planners care at all about the safety and welfare of the students and teachers.

Yours sincerely,

Amy Byrne