



## **Consultation on the Canterbury Local Plan and Policy C12**

As an economist with more than 50 years' experience of research and policy advice on transport and regional development, as well as a concerned local resident, I offer the following comments and criticisms on the District Plan for 2040 with particular reference to policy C12.

### **Vision and strategy**

The overall vision and strategy for Canterbury District makes all the right noises about the *environment, transport, housing and sustainable growth*. However, the detailed plans contradict many of these, subverting statements about valued landscapes, protecting and enhancing green gaps between settlements, and enhancing biodiversity.

- Focussing development on *new settlements* rather than the expansion of existing ones is a sensible concept, but such settlements must be genuinely independent of existing settlements not forced into convenient spaces between them with token green gaps. The 15 minute neighbourhood concept is valuable but to work effectively must be self-contained within a single settlement and not overlap with other settlements. Ideally such settlements include employment opportunities.
- The *housing targets* are formulaic and bear little relationship to any formal analysis of the *economic and employment profile* envisioned. There needs to be an analysis of the future shape of employment rather than just land provision for the assumed needs of different sectors. Without this and given the emphasis on the transport links to London and other urban areas there is a danger that new housing provision with good access to Canterbury West becomes simply dormitory estates with little relationship to the local economy.

### **Transport strategy**

A *bus-led strategy* supported by improved *provision for active modes* is probably the only viable one for the District. However, given the current structure of deregulated bus services which seems unlikely to change in Kent, this will be dependent on the commercial decisions of the incumbent operators and support from Kent County Council to fill gaps in provision. The supporting bus strategy document makes it clear that the *commercially viable routes* are the main inter-urban routes. The only policy levers for the Council are bus priority schemes and park and ride provision. *Park and ride* may reduce city centre congestion but can be counterproductive in encouraging driving and reducing the viability of longer bus routes, reducing the available options, particularly for non-car owners. The lack of park and ride to the north of Canterbury is noted but there seems to be no identification of possible sites, and the likely effect on congestion in the area. The bus strategy also needs to address the relatively *poor connectivity to rail stations*, particularly Canterbury West, to improve seamless multi-

modal journeys. The scope for rail connectivity and bus priority schemes on routes from the north of Canterbury is also limited by the constraint of the Westgate Towers.

### **Policy C12 Land north of the University of Kent**

This proposal is ill-conceived, out of scale, and in conflict with most of the general presumptions of the District Plan strategy. It is not as claimed a “highly sustainable free-standing settlement” as it is squeezed between two villages with only minimal separation planned. It is difficult to see how it can be claimed to be “rural” given its scale and being in effect a continuation of the urban character of the areas to the south. *There are three specific areas of detailed concern, heritage, biodiversity and traffic.*

#### *Heritage*

The area around the Grade II\* listed Blean Church, the neighbouring earthworks (believed to have Roman connections) and the surrounding medieval field patterns are irreplaceable places of historical significance. More recent partial exploration of the field to the east of Blean Church has revealed considerable new evidence of settlements. This would be lost for ever but more importantly the landscape setting of a historical church on a site where there has been worship from at least the 6<sup>th</sup> century and which is on a well-used historical trail from Canterbury to the coast would be destroyed.

#### *Biodiversity and landscape*

The existing green gap between Blean and Tyler Hill is an important contributing element to the Blean Woods area of national significance. Wildlife and nature are critical and the mix of woodland and open fields with trees and hedgerows are complementary to each other as well as providing recreational access through the Crab and Winkle cycle route and the network of footpaths that give widescale access to this whole area for both local residents and tourists. The loss of Grade 2 and 3 agricultural land contradicts the strategic guidance as well as imposing a permanent change of character in the setting of the two villages.

#### *Traffic*

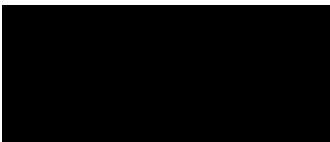
The plan acknowledges the complexity of the traffic implications but claims that they can be resolved but only vague proposals about a Transport Assessment are included. It seems to assume that these problems will be overcome rather than relying on an objective assessment. This proposal cannot be allowed to go ahead without prior analysis and identification of detailed traffic modelling. The main concerns are the impacts on Whitstable Road, Rough Common Road and Tyler Hill Road.

- The former two seem to be dependent on an improvement to the A2 junction at Harbledown (largely outside the City Council’s control) and to “improvements” to the residential Rough Common Road as well as a new major intersection at Rough Common Road/Kent College and a secondary one at the site of Blean School. This implies a major generation of traffic in addition to that generated by the development in C12, with detriment to access from the north along the A290.
- The plan proposes to “minimise traffic flow onto Tyler Hill Road”. Whilst it would be possible to preclude any connections onto Tyler Hill Road from the areas of site C12 to the south of the road, the areas to the north of Tyler Hill Road could only be

accessed via Tyler Hill Road, and would then, if there is no connection into the site to the south of the road, not be able to use the primary access points of the development onto Whitstable Road.

- Tyler Hill Road (of which I am a resident) is already heavily used, especially at peak times and by delivery vans. Congestion on Whitstable Road at the Rough Common Road roundabout often leads to peak-hour delays back to Tyler Hill Road in Blean and traffic then diverts via Tyler Hill Road to try and avoid the congestion. An extra junction at the current site of Blean School would add to this as would the larger junction at the proposed primary access point.
- There are vague presumptions that Tyler Hill Road can be improved to support easier cycling and pedestrian access, but the road has properties at both ends which are adjacent to the road plus mature hedgerows, trees, and a pond all of which contribute to the existing Blean and Tyler Hill Conservation Areas, so it seems infeasible to add segregated facilities along the existing road. Extra traffic would raise increased safety concerns above those already experienced. Off road pedestrian and cycle facilities are likely to be impossible due to the pattern of land ownership (as evidenced by the dropping of the Mill Field development proposed in the previous version of the District Plan).
- The plan is clear that the development will be primarily car-based but with provision for a bus connection to Canterbury West station and the city centre. Given existing provision on city bus routes especially in the evening and on Sundays, it is not clear that this will be a viable commercial operation sufficient to reduce the demand for car ownership in the development. Car ownership could be discouraged by restrictions on provision for car parking and the encouragement of car clubs, but this seems unlikely to be an acceptable outcome to any developer.
- The off-road nature of the ancient Salt Road/Crab and Winkle Way would be lost with detriment to its recreational value and safety for its current use as an alternative cycle and walking route to the University and Blean School avoiding the potentially dangerous A290.

In short, this development would have the potential to inflict serious environmental, traffic and social harm in contravention of the overall guiding principles of the District Plan.



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31 May 2024