Comments on Policy C12 of Draft Local Plan to 2040

These comments explain in more detail why Policy C12 should be scrapped.

Transport

In the Sustainability Assessment of the SLAA, SiteC12 is described as a “car-dependent development”. This is likely due to the location up a steep hill and the need for people to be able to access the hospital, schools, a choice of supermarkets, petrol stations etc. Many people are unable to cycle or walk the 2 miles to Canterbury and for buses to be provided, especially by Stagecoach, cannot be guaranteed. The local buses have recently been cut along Rough Common Road.

The two main access points for traffic on Whitstable Road would cause immeasurable congestion right beside three large schools. Rough Common Rd (RCRd) would need “highways improvements” and RCRd, a residential, often narrow street would be a major route into Canterbury. During construction especially, life for residents on RCRd would be very badly affected. At present children walk along RCRd and Whitstable Road, and the Crab and Winkle Way from Rough Common and Blean to Blean School; an ‘upgraded’ road would make this unsafe, cause pollution, and parents would need to use cars. Cars would also be needed to transport children from all three surrounding villages to get to a new school sited at the 'hub'.

The site is shown as being on both sides of Tyler Hill Road (THRd) but the plan says 'it will minimise traffic flow onto THRd. Nearby roads are dangerous, narrow and winding with speeding and frequent accidents.

Access

The proposed access sites on Whitstable Road would cut through the suggested ‘opportunities for green corridors’ at many points, thus rendering them ineffective.

The main access point and route is along the Crab and Winkle Way cycle path, a well used and loved route with open views, through the University’s Oasis Garden, natural open spaces and alongside the most ‘valuable agricultural land, ancient woodland, historic sites, the church of St Cosmos and St Damian in the Blean and the home to rare habitats and species such as nightingales, yellowhammers, birds of prey, bats, newts and most importantly, skylarks who return year upon year (I have lived near here for 30 years).

The other main access point would involve the demolition of an Outstanding Primary School and its relocation. This would have a significant effect on the well-being of children, staff and parents. It would involve additional car journeys being needed to get to school, so congestion and air quality would not be improved.

Land Character, Biodiversity and use

The Council’s 2021 Landscape Character Assessment describes the “strong rural character” of this landscape and says it should be conserved. 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, which the Local Plan must follow.

The University of Kent's assessment in 2014, by Penoyre and Prasad, rejected some of this area as unsuitable for development on grounds of impact on the open character of the area, distance from the city centre, encouraging car travel and destroying important habitat areas.

Green Gap Assessment 1.1 recommends 'Conserve the rural character of the landscape ensuring that it continues to play a role in the separation of Rough Common and Blean; the University of Kent and Tyler Hill; and Sturry and Canterbury. Ensure development does not extend north of this area into the more rural Blean '- Policy C12 contradicts this.

The Sustainability Assessment (SA), says this would be on 'best, most versatile agricultural land' which the Local Plan seeks to protect. It would destroy hedgerows (protected by law - see Hedgerow Regulations 1997), open views and connectivity between areas of the Blean Woodland Complex. The SA also states that there would be 'significant negative effects on transport highways'.

Policy DS23 protects the Blean Woodland Complex 'from inappropriate development while ....improving connectivity and biodiversity'. Green corridor areas suggested on C12 site plans are dissected by the access routes, making them useless.

As your Natural Environment and Open Space Topic Paper 2024 in Ch 7, The Blean Woodland Complex, policy DS23, says, the SiteC12 is in "close proximity to land designated as SPA, SAC, RAMSAR , NNR land" ; Site C12 contains cultivated "best agricultural land", it "has long distance views" and is a "green corridor" between parts of the Blean Woodland Complex. You even say Ch 6, it could be Functionally Linked Land, suitable for the Golden Plover and so should be protected. We already have skylarks -these are protected and on the red list -see iNaturalist. We want them HERE, not 'mitigated for', somewhere else.

The Council’s other policies (eg SS1.10) say that it will continue to work with to extend and improve connectivity of the Blean Woodland Complex, but this development would make connectivity impossible. The development site is right in the middle of the Blean Woods area, surrounded by parts of the National Nature Reserve. There are many rare and endangered species living in the fields, ponds, hedgerows and Sarre Penn valley

History

The Environmental Strategy says “the council is committed to protecting and... enhancing the historic environment for future”. With Policy C12 the setting of Blean Church would be destroyed. The site also includes the scheduled monuments of the remains of Medieval tile kilns and a Roman Villa, listed buildings and conservation areas. The council’s 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”.  
The very fact that the proposed access route is through a conservation area and past listed buildings and skylark nesting fields makes mockery of these safeguarding provisions.

Countryside

The CCC Development Topic Paper2024, states 'No residential development will be allocated in the countryside'. Therefore this C12 site should not be built on. It is countryside!