

**DRAFT CANTERBURY DISTRICT
LOCAL PLAN REGULATION 18
REPRESENTATIONS STATEMENT ON
BEHALF OF

SAVE THE BLEAN**

May 2024

WS Ref: J004893

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CONTENTS

Section	Page
1.0 Introduction	1
2.0 Chapter 2: Canterbury: Policy C12: Land north of the University of Kent	3
3.0 Countryside & Greenfield Land	6
4.0 Highways & Transport	15
5.0 Biodiversity & Ecology	21
6.0 Heritage Assets	28
7.0 Flood Risk	29
8.0 Impact on Community Facilities	32
9.0 Character & Appearance	33
10.0 Housing Land Supply	37
11.0 Conclusion	39
12.0 Appendices	40

1.0 **INTRODUCTION**

1.1 WS Planning & Architecture are instructed by Save the Blean to submit representations in connection with the Draft Canterbury District Local Plan Regulation 18 which was published in March 2024.

1.2 The representations contained within this submission relate to Policy C12 – Land north of the University of Kent which is contained within Chapter 2: Canterbury of the Regulation 18 document. Specifically, this representation seeks to address the following themes which demonstrate why this site is an unsuitable allocation for a comprehensive mixed-use development. These themes are as follows:

- Countryside & Greenfield Land
- Highway and Transport
- Biodiversity and Ecology
- Heritage Assets
- Flood Risk
- Impact on Community Facilities
- Character and Appearance
- Housing Land Supply

1.3 This representation essentially demonstrates why the site which is allocated for development at land north of the University of Kent is unsuitable. This submission is supported by the guidance contained within the NPPF (2023) and the other policies contained within the Canterbury District Draft Local Plan Regulation 18, which highlight that Policy C12

would be contrary to national and local planning policy. This submission illustrates the level of harm that would be produced should the land north of the University of Kent be developed, demonstrating why Policy C12 should not be taken forward or included within the new Local Plan.

2.0 CHAPTER 2: CANTERBURY: POLICY C12: LAND NORTH OF THE UNIVERSITY OF KENT

- 2.1 In relation to the above policy, the Council state that **“Site C12 is allocated for a comprehensive mixed use development. Planning permission will be granted for development which meets the following criteria”**. However, it is considered that this site is not suitable for this form of development due to a number of reasons which are discussed in turn in the following chapters.
- 2.2 In order to assess whether the site is suitable for the proposed development, it is important to outline what is proposed to be included within this site allocation. Ultimately, the site is allocated for **“approximately 2,000 new dwellings including affordable housing, older persons housing, accessible housing, self building housing and an appropriate housing mix in line with Policies DS1 and DS2”**.
- 2.3 In addition to the above, Policy C12 also outlines a number of non-residential developments that would need to be included for planning permission to be granted. This includes the provision of various leisure, business, community and educational facilities. However, given the various constraints present on the site and in the surrounding area, this policy is not considered sound. It is noted that this policy would conflict with a number of other policies included within the Draft Local Plan. Furthermore, Policy C12 contradicts the University’s Masterplan (2019), where current planning policy (Policy EMP7 of the Local Plan) requires that significant development proposals at the University would be subject to updating of the University’s Transport Impact Assessment and a review of the University Travel Plan, of which neither has been produced to date. In this instance, it is not considered that an exception should be made for this policy due to the harm that would be caused by this site allocation.

2.4 As part of this submission which objects to Policy C12 of the Draft Canterbury District Local Plan that was published in March 2024, due regard should also be given to the Sustainability Appraisal Report – Draft Canterbury District Local Plan 2040 (Regulation 18) which was published in February 2024. **Table 1** below refers to the site allocation at land north of the University of Kent and sets out the key sustainability effects anticipated as a result of the implementation of the development.

Table 5-8 - Summary SA of proposed new settlement north of University of Kent

SHELAA Site Ref:	Site Address:	SAO 1: Air Quality	SAO 3: Biodiversity	SAO 4: Geology	SAO 5: Landscape	SAO 6: Water	SAO 7: Flood Risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: S: Health and sustainable communities
SLAA319	Land north of University of Kent	0	--	--	--	--	++	--	++	++/-	++	++/-	++/- ?

Table 1: Summary of Sustainability Appraisal regarding Land north University of Kent

2.5 **Table 1** above clearly demonstrates that the proposed new settlement would have a number of significant detrimental impacts, suggesting that this potential new settlement would result in a number of negative effects that would not be overcome by the benefits of the development. Amongst several significant negative impacts, it is important to highlight that this report confirms the new settlement would change the character of the site and the open countryside in this location, demonstrating that, fundamentally, the site is unsuitable for the proposed allocation. As such, the policy would be contrary to the aims and objectives of the NPPF (2023) and Policies R19 and DS4 of the Draft Canterbury District Local Plan.

2.6 In relation to **Table 1**, we would like to highlight four key issues with the assessment undertaken as part of the Sustainability Assessment which will be discussed further within this report. These key issues are as follows:

- The evidence of the negative impacts of air quality on the Blean Woods Complex has not been given due consideration;
- Evidence of flood risk in crucial parts of the proposed site allocation have not been given due consideration;
- To date, limited evidence has been provided on the potential economic benefits of the site allocation;
- There is insufficient evidence regarding the Transport Strategy to support the assumption that the proposed site allocation would result in a positive impact in this regard through greater use of public transport.

2.7 As such, it is considered that this policy should be removed from the Draft Local Plan as it would conflict with a number of other policies, where it is not considered that the harm identified would be overcome by the benefits of any subsequent development. The main issues relating to Policy C12 are discussed in the chapters below.

3.0 COUNTRYSIDE & GREENFIELD LAND

- 3.1 In relation to Policy C12 – Land North of the University of Kent (Site Allocation) it is noted that this proposed policy would conflict with the countryside character of the site, where the harm identified would not be overcome by the benefits of the potential development.
- 3.2 It is important to highlight that within the Sustainability Appraisal Report, in relation to landscape it states, “**due to the potential change in character of the site and open countryside in this location, which is also a green gap**” (Paragraph 5.6.36, Page 55). Therefore, it has been acknowledged that Policy C12 would have a detrimental impact on the existing character of the area. It must be emphasised that within the independent Sustainability Appraisal, the impact on landscape was considered to comprise a significant negative effect (as shown in **Table 1**). The depletion of this high-quality countryside land should not be overlooked; therefore, Policy C12 should be removed from the Draft Local Plan prior to this proceeding to Regulation 19.
- 3.3 Within the NPPF (2023), Chapter 15 is titled ‘Conserving and Enhancing the Natural Environment’ where planning policies should contribute to and enhance the natural and local environment. The NPPF (2023) advises that policies and decisions should seek to protect and enhance valued landscapes. It is not considered that Policy C12 would comply with this guidance set out in the NPPF (2023) as the potential development would clearly not enhance or protect the valued landscape. In relation to this, it is also evident that the Local Planning Authority have not recognised or given due regard to the intrinsic character and beauty of the countryside when allocating this site, as it is apparent that the landscape mitigation required as part of any future development would not mitigate the harm to the countryside.

- 3.4 In addition to this policy not complying with the guidance outlined in the NPPF (2023), it must be highlighted that limited/no weight has been given to the Canterbury Landscape Character Assessment and Biodiversity Appraisal (2020) where specific reference is made to Amery Court Farmland, where the site is located. Please see **Figure 1** below.

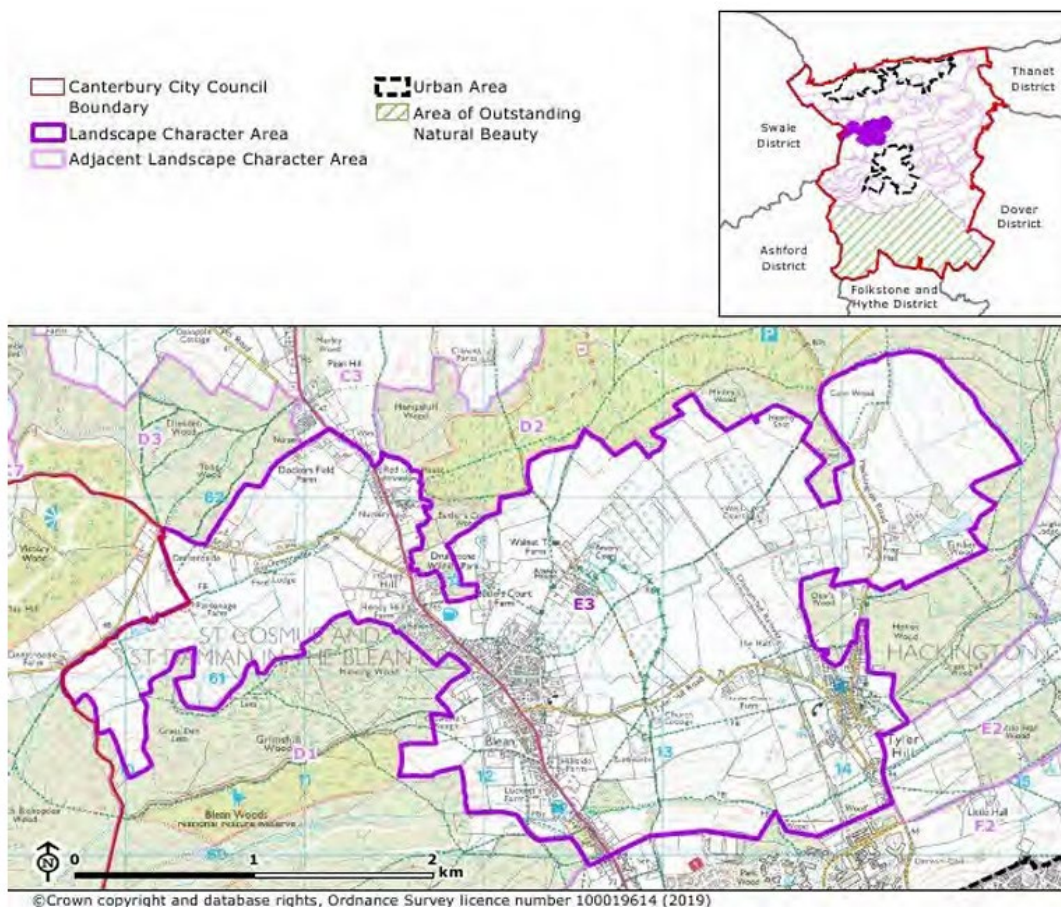


Figure 1: Map showing Amery Court Farmland

- 3.5 The Character Appraisal describes the area as “**an undulating landscape consisting of a network of arable and fruit fields enclosed by the Blean Woods to the north, east and south and extending to the district boundary with Swale to the west**” (Paragraph 1, Page 162). Within the ‘Key Sensitivities and Values’ section of the appraisal, the area is referred to as a farmland landscape forming part of the wider Blean, a

rural area with views contained by woodland with a strong sense of containment and enclosure. Particularly, the Character Appraisal states that the **“strong rural character present in close proximity to Canterbury City and integral part of the wider Blean landscape between Canterbury City and the coast”** (Page 170). This character appraisal demonstrates that the site plays a crucial role in the character of the local landscape. However, it appears that this guidance has been overlooked in the creation of Policy C12 as little regard has been given to the character of the landscape and the crucial role it plays in the wider area. It is considered that significant weight should have been given to the character appraisal when allocating this site. Which in turn should lead to the conclusion that the site is unsuitable for a major mixed-use development. Therefore, this policy should be removed from the Draft Local Plan.

- 3.6 Further to the above, it is important to highlight that the land north of the University of Kent comprises an area of countryside between two existing settlements to the east and west, and also borders the city of Canterbury to the south. As such, the development of this site would result in a number of existing settlements coalescing which would result in urban sprawl from the existing settlements that have been established within the countryside. This assertion is supported by the Canterbury City Council Canterbury Landscape Character Assessment and Biodiversity Appraisal where it states, **“maintain the essentially linear pattern of Blean and Tyler Hill villages avoiding further infilling or extensions that would create a greater urban extent”** (Page 167). Furthermore, it also states **“maintain the open rural gaps along the main north south routes allowing views into the wider rural landscaping and woodland, maintaining separation between built areas”**. (Page 167). In addition, it must be noted that the open spaces shown on the concept masterplan are only

indicative and are not considered to address the above concerns regarding urban sprawl. On this basis Policy C12 should be removed from the Draft Local Plan.

- 3.7 In relation to the above, it is also important to highlight that the southern part of the site is located in the Canterbury area of High Landscape Value whilst Blean Woods is identified as an Area of High Landscape Value. Hence, it is evident that these areas should be protected from future development. In relation to this, it must be highlighted that the site is also located within the North Kent Plain National Character Area which is described as **“a very productive agricultural area with predominantly high-quality, fertile loam soils characterised by arable use”**. These landscape designations highlight the high value of this site and further demonstrate why this site is unsuitable for a major development. It is noted that Policy C12 would be contrary to the Land Character Assessment (2021) highlighting that the policy has not given appropriate consideration to the existing supplementary planning documents.
- 3.8 In addition to the fact that the Policy C12 would be contrary to local planning documents, it is also important to highlight that the Land north of the University of Kent largely comprises greenfield land. Please see the images below of the site, which demonstrate its greenfield appearance. It is noted that these images are taken from of various different parts of the proposed site allocation.



Figure 2: Images to show the appearance of the proposed site allocation

- 3.9 Given that the site predominantly comprises greenfield land, it is considered that there are more suitable sites within the District which would not result in the depletion of countryside land. It is noted that the reuse of brownfield sites should be encouraged as stated in the NPPF (2023) where **“strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”** (Paragraph 123, Page 36). In this instance, it is not considered that the Council have had due regard to Paragraph 123 of the NPPF (2023) as there are many other brownfield sites within the District which should be prioritised for development as these far more suitable for development than the site allocation at the land north of the University of Kent, which

would result in the depletion of a large section of the greenfield countryside land between Canterbury city and the coast.

- 3.10 In accordance with **Table 1**, it is noted that the loss of the greenfield site was viewed as neutral due to the partial redevelopment of brownfield land. The Council have noted that the site comprises a mix of greenfield and brownfield land. Yet, within Policy C12, the amount of the site which comprises brownfield land is not quantified, which is considered misleading. As it is important to highlight that the vast majority of the site comprises greenfield land, with only a very small proportion of the site being brownfield land, which would be used to access the site. Therefore, it is considered that very limited weight should be given to the use of the brownfield land in this instance, as this only comprises a very small proportion of the site, recognising that the overwhelming majority of development would occur on the greenfield land.
- 3.11 In relation to the above, it is noted that alongside brownfield registers there are other ways in which new residential development can be secured that does not include the loss of greenfield land. Permitted development rights have been expanded in recent years to enable more works to be undertaken under permitted development rights. Particularly Class MA of the GPDO enables buildings in Class E use to be converted into residential dwellinghouses. Class O also enables the change of use from offices to residential development. It is considered that these routes should be further explored by the Council prior to promoting the use of greenfield sites in the countryside for residential development.
- 3.12 In addition to the above, it is also important to highlight the quality of the agricultural farmland which is proposed to be used for this site allocation. As illustrated in **Figure 3** below, the site allocation comprises Grade 2 & Grade 3 agricultural land. Therefore, the site comprises very good quality

agricultural land, where its development should be resisted. This is confirmed in the NPPF (2023) which states “**areas of poorer quality land should be preferred to those of a higher quality**” (Footnote 62, Page 52). In this instance, it is considered that there are many other sites within the district of Canterbury which comprise lower grade agricultural land that would be more suitable for a major development scheme. In relation to this, it is also important to highlight that the southernmost part of the site lies within the Blean and Rough Common Green Gap. Therefore, the proposed development would result in the depletion of this green gap which would have a detrimental impact on the local area. It is also noted that Policy C12 has not included provision for a Green Gap between the proposed site and the existing settlement of Blean. The lack of a green gap further highlights that this site allocation would result in the coalescing of settlements.

3.13 Given the Grade of the agricultural land that is included within this site allocation, it comprises part of the “best and most versatile” land in the UK. As such, the NPPF (2023) suggests that this land should be retained for agricultural purposes and more suitable sites which comprise lower quality land should be utilised for development.

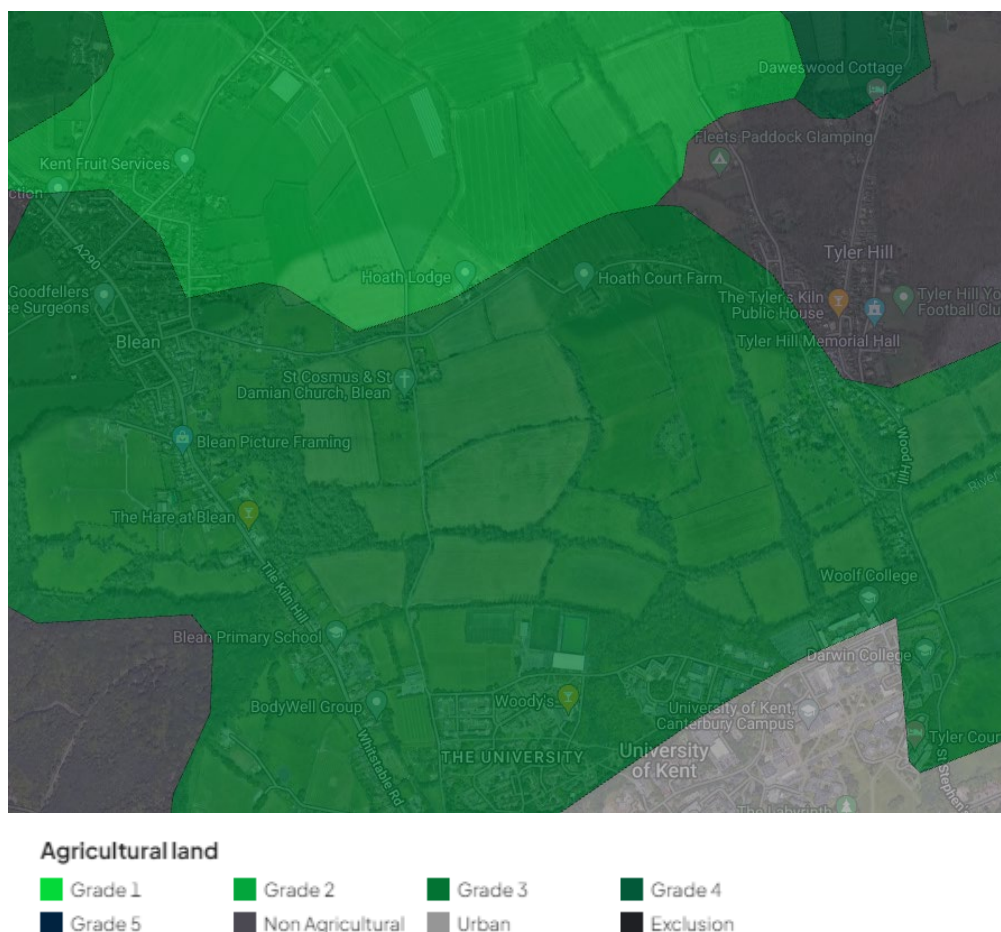


Figure 3: Searchland map extract to show Grade of Agricultural Land

3.14 Given the high quality of the existing agricultural land, it is evident that the redevelopment of this site would be contrary to the aims and guidance contained within the NPPF (2023) particularly in relation to agricultural grade of this land. Therefore, Policy C12 should be removed from the Draft Local

Plan as it would result in the depletion of high grade agricultural land which is unacceptable in planning terms.

- 3.15 Considering the above, it is evident that Policy C12 – Land north of the University of Kent in the Draft Canterbury City Local Plan would cause significant harm to the countryside character of the site, which would not be overcome by landscaping mitigation. It is noted that this policy would result in the loss of a highly regarded greenfield, countryside site that represents an important green gap between Canterbury city and the coast. A settlement in this location would result in the degradation of the landscape and the coalescence of multiple settlements which would be uncharacteristic of the local area, drastically changing its overall appearance. Hence, this policy should be removed from the Draft Local Plan.

4.0 HIGHWAYS AND TRANSPORT

- 4.1 In relation to Policy C12 – Land north of the University of Kent, which is contained within the Canterbury City Draft Local Plan, it is important to consider the highways implications of a major development in this location. In this instance, it is considered that the highways impact of a major development would be significant and would result in an adverse impact on the local highways network. For this reason, Policy C12 should be removed from the Draft Local Plan.
- 4.2 The Concept Masterplan for Policy C12, highlights two indicative locations for vehicular access to the site. Both of these accesses would be to the south of the site from Whitstable Road. **Figures 4 & 5** below show the existing appearance of the proposed vehicular accesses to the site.



Figure 4: Proposed Secondary Access



Figure 5: Proposed Primary Access

- 4.3 In relation to the potential highways issues which are likely to arise from the site allocation, it is important to highlight that the Sustainability Appraisal concluded that the proposed site allocation would result in significant negative effects in terms of its impact on the highway network. The significant negative effects found in the Sustainability Appraisal should be given considerable weight and underscore the unsuitability of the site for a major development. It is noted that whilst these proposed access points have been illustrated on the concept masterplan, there has been no supporting assessment to demonstrate how these would provide satisfactory access. It is noted that the proposed access to the south would seek to utilise part of the Crab & Winkle Way Cycle Route which runs from Canterbury to Whitstable. However, this cycle route would have to be substantially widened to enable the creation of a full access route which would have a detrimental impact on the cycle route and the sustainable

transport modes of existing residents including local walking routes which are well used by existing residents. Hence, this policy would be contrary to the sustainability objectives of national and local planning policy. Whilst it is acknowledged that Policy C12 outlines that the proposal would improve cycle connections to Whitstable via the Crab and Winkle Cycle Route, it is considered that these enhancements would be negligible given the drastic increases in traffic volume that would be created as a result of any subsequent development.

- 4.4 Policy SS4 of the Draft Local Plan is titled 'Movement and Transportation Strategy for the District' where it states, **“new development should ensure easy and safe pedestrian and cycle connectivity is available, including segregated cycle lanes where achievable, with high levels of connectivity to the wider network, including within and between neighbourhoods”**. However, given the countryside location of the site allocation, it is not considered that pedestrian and cycle connectivity would be achievable. Given the proximity to local services and transport links, it is likely that any subsequent development would be car dominated which would be contrary to Policy SS4 of the Draft Local Plan and the guidance contained within the NPPF (2023). Whilst it is acknowledged that some local shops and services would be incorporated within the development, there would still be a significant increase in vehicular movements due to the scale of the development and the limited services which are located within close proximity of the site allocation due to its countryside location.
- 4.5 Within Policy C12, it is suggested that a public transport strategy will be implemented as part of the proposal **“with a new bus route connecting residential areas and the community hub to Canterbury West railway station and the city centre”** (Paragraph (b), Page 55). However, it is questioned whether this would be successfully implemented as the

Sustainability Appraisal describes the proposed development as a large-scale car dependent development.

- 4.6 Given the nature of roads within the surrounding area, it is assumed that many of these roads would need to be significantly altered to enable the development to take place. Particularly, it is noted that the proposal would result in a detrimental impact on Rough Common Road which is sited close to the proposed primary accesses to the site. As part of the potential development, it is likely that this road would need to be widened which could result in the loss of some existing on street parking and pavements. The vast increases in traffic anticipated from this large-scale development would have a detrimental impact on the existing walking and cycling routes present in the local area. Therefore, any future development would result in a significant negative effect on the sustainable transport modes which have been implemented. Whilst it is acknowledged that the proposal would include a new bus route, there is no evidence based grounding to support a large modal shift to buses working in this location, particularly given that some local bus routes have been removed suggesting that existing local residents are not using them.
- 4.7 In addition to the above, it is also important to highlight the safety issues which are currently present on the existing roads. Please see the Crash Maps Extract at **Figure 6** which shows the number of accidents which have occurred on roads in the surrounding area. It is important to highlight that any subsequent development would further exacerbate these existing issues. Therefore, given the scale of the development, it would result in a negative effect on the local highways network and for this reason Policy C12 should be removed from the Draft Local Plan, to ensure the safety of the road network is maintained.

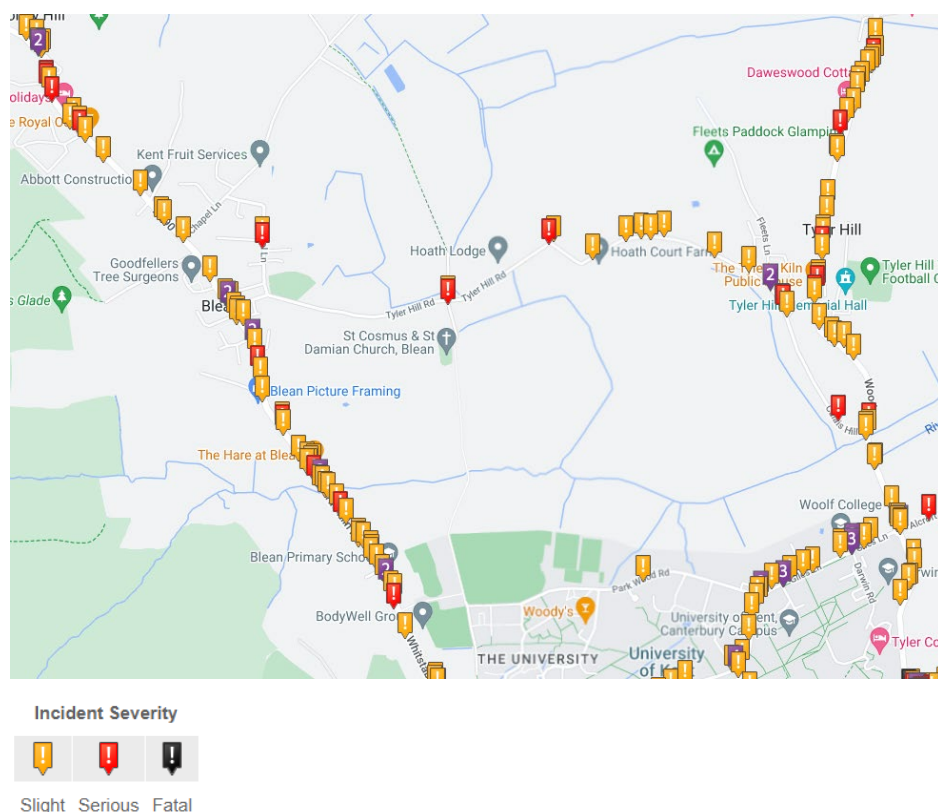


Figure 6: Crash Maps Extract showing accidents which have occurred between 1999 – 2022

- 4.8 Within Policy C12, specific reference is made to Tyler Hill Road, where it is stated that as part of development of the site any development should “**minimise traffic flow onto Tyler Hill Road in both directions**”. However, given that this road runs directly through the centre of the site allocation, it is questioned how this could be achieved. It is likely that Policy C12 would increase the volume of traffic on Tyler Hill Road, a narrow winding country road, which would have significant detrimental impacts on highway safety. Whilst it is acknowledged that there are no access points onto Tyler Hill Road highlighted on the Concept Masterplan, it is questioned how the traffic flow onto this road will be limited given that this road runs directly through the centre of the site allocation as it is likely there will be some vehicular access points along this road.

- 4.9 In October 2022, a Transport Topic Paper was published by Canterbury City Council. Within this document, a modelling activity was undertaken to inform the Draft Local Plan which included specific proposed housing allocations and highways interventions, specifically the proposed development at Land north of the University of Kent was included within this modelling exercise. This exercise found **“it highlighted an issue to the north of the city with considerable congestion around junctions at Hackington Road to the north of the University of Kent and significant increases in traffic flow on Whitstable Road and Tyler Hill Road. For this reason development at University is not currently being pursued within this Local Plan”** (Paragraph 1, Page 4). This evidence suggests that the proposed site allocation at land north of the University of Kent would have a detrimental impact on the local highways network due to the significant increases in traffic flows that would be created by this development. This traffic increase would be contrary to the guidance contained within the Canterbury Landscape Character Assessment and Biodiversity Appraisal (2020) which states that development proposals should **“maintain the limited road access within the area away from the main north-south routes and maintain the rural character of the few lanes that cross the area”** (Page 167). For the reasons outlined above, Policy C12 should be removed from the Draft Local Plan.
- 4.10 In conclusion, given the scale of the site allocation, its rural location and the limited evidence to support how safe and sufficient accesses to the site would be achieved, Policy C12 should be removed from the Draft Local Plan without delay.

5.0 ECOLOGY & BIODIVERSITY

- 5.1 In relation to Policy C12 – Land north of the University of Kent, it is important to consider the ecological and biodiversity implications that may be created should this policy be taken forward in the adoption of the new local plan. Given the existing countryside appearance of the site, it is considered that there would be a number of negative impacts.
- 5.2 Turning first to biodiversity, it is noted that the Sustainability Appraisal (shown at **Table 1**), states the proposal would have a significant negative effect in this regard. It is assumed that this is due to the significant biodiversity currently present on the site, as it is an important wildlife corridor and comprises the Blean Pastures Wildlife Site within the development boundary. Within the Sustainability Appraisal it states **“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)”** (Paragraph 5.6.35, Page 78). This demonstrates that there are several constraints on the site which should be given significant weight.
- 5.3 In relation to the ancient woodland designation, **Figure 7** illustrates the areas of ancient woodland that are present on and near to the site. It is noted that the Government Guidance defines ancient woodland as **“any area that’s been wooded continuously since at least 1600 AD”**. In relation to this, the Government Guidance notes that **“you should refuse planning permission if development will result in the loss or deterioration of ancient woodland”**. Particularly, it is noted that ancient woodland is irreplaceable. Therefore, proposed compensation measures should not be considered acceptable as part of the development proposal.

Despite, this guidance, Policy C12 states that the green and blue infrastructure strategy should “**minimise loss or damage to ancient woodland at “Long Thin Wood” through the provision of the primary access**” (Paragraph (h), Page 54). This statement suggests that there may be some harm to the ancient woodland, which should be viewed as unacceptable and would not accord with the government guidance on ancient woodlands.

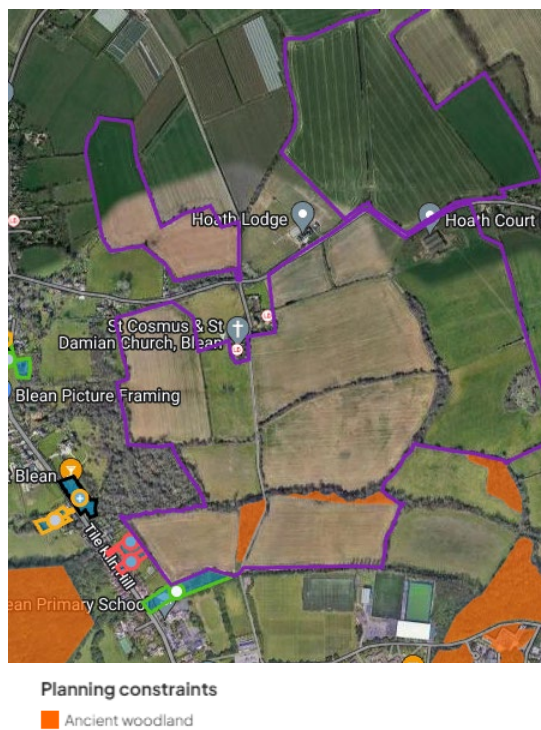
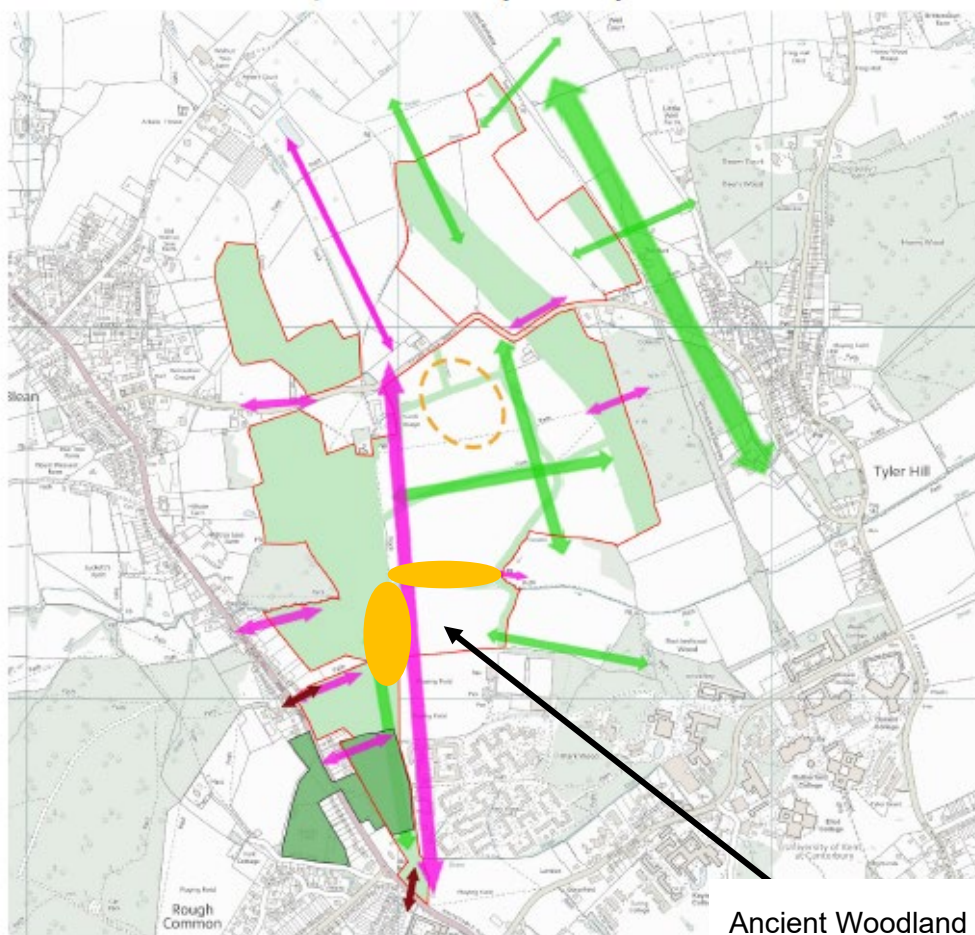


Figure 7: Extract to show Ancient Woodland

- 5.4 As indicated by the Concept Masterplan, shown at **Figure 8** below, the proposed accesses to the site would be sited extremely close to the ancient woodland on site. Therefore, it is anticipated that these would result in detrimental impacts on the ancient woodland which would be unacceptable. For this reason, it is strongly recommended that Policy C12 is removed from the Draft Local Plan due to its impact on the ancient woodland, including the proximity of the proposed access to the major

mixed-use development. It is considered that the proposal would result in the harm and depletion of the ancient woodland which is unacceptable and is in conflict with national guidance.

Land north of the University of Kent - concept masterplan



Key

- Site boundary
- Open space/ biodiversity opportunities- Indicative locations
- Green Gap
- ➔ Opportunities for green corridors
- ➔ Vehicle access- Indicative location
- ➔ Opportunities to improve cycling/walking access and safety
- Community hub- Indicative location

Figure 8: Concept Masterplan of Site, illustrating location of Ancient Woodland

- 5.5 In relation to biodiversity more generally, the Sustainable Appraisal notes that this would have a significantly negative impact. Within the Draft Local Plan, it is suggested that Policy C12 would create an improved ecological connectivity to key natural assets in the area, including the Blean Woods. However, this assumption is considered incorrect, as due to the scale of the proposed development, it would sever ecological connectivity and would be ecologically damaging. Whilst some green corridors and green gaps are proposed (as shown in **Figure 8** above), these are not considered sufficient to mitigate the detrimental impacts on biodiversity that would arise because of this development. In addition to this, it must be reiterated that the proposed opportunities for green corridors outlined on the concept masterplan are entirely indicative and are not supported by any evidence at this stage. Particularly, it must be highlighted that some of the green corridors outlined are outside of the site boundary and are located on private land, meaning there would be no opportunity to enhance these areas. Hence, given the high biodiversity level of the existing site, Policy C12 should be removed from the Draft Local Plan as it would not comply with local and national planning guidance.
- 5.6 In relation to priority habitats, this was assessed, and the development was viewed to have a significantly negative impact within the Sustainability Appraisal. The Blean Complex Special Area of Conservation (SAC) is located within 400m of the site and is a complex priority habitat. Whilst it is acknowledged that Policy C12 states that “**no residential development shall take place within 400m of the Blean Woods SAC**” (Paragraph (e), Page 54), it is not considered that this would mitigate any perceived harm to the SAC. Policy SS1 of the Draft Local Plan notes that the Council will continue to work with partners to support the extension and improved

connectivity of the Blean Woodland Complex. If Policy C12 were to be included within the local plan, Policy SS1 could not be met.

- 5.7 It is noted that the Kent Wildlife Trust are currently undertaking a project known as 'Wilder Blean' where they are seeking to restore the natural biodiversity of the landscape to transform the woods into a thriving biodiverse environment. As part of this work, land north of the University of Kent would act as a 'Connector' in Phase 2 of the 'Wilder Blean' project. 'Connectors' are identified as **“key areas for connectivity including designated sites like Local Wildlife Sites, SSSIs, National Nature Reserves and Special Areas of Conservation plus areas outside of existing protected areas that could help in reconnecting the landscape for people and wildlife”**. It is noted that within Policy SS1 of the Draft Local Plan, reference is made to the Council supporting the extension and improved connectivity of the Blean Woodland Complex. However, the Council would not be able to meet this policy if the development at the land north of the University of Kent takes place as this would be located in the middle of the 'Wilder Blean' project area (see **Figure 9** below) and would mean the area is no longer able to act as a 'Connector' area. Therefore, Policy C12 would conflict with other policies with the Draft Local Plan and for this reason this policy should be removed from the Local Plan.

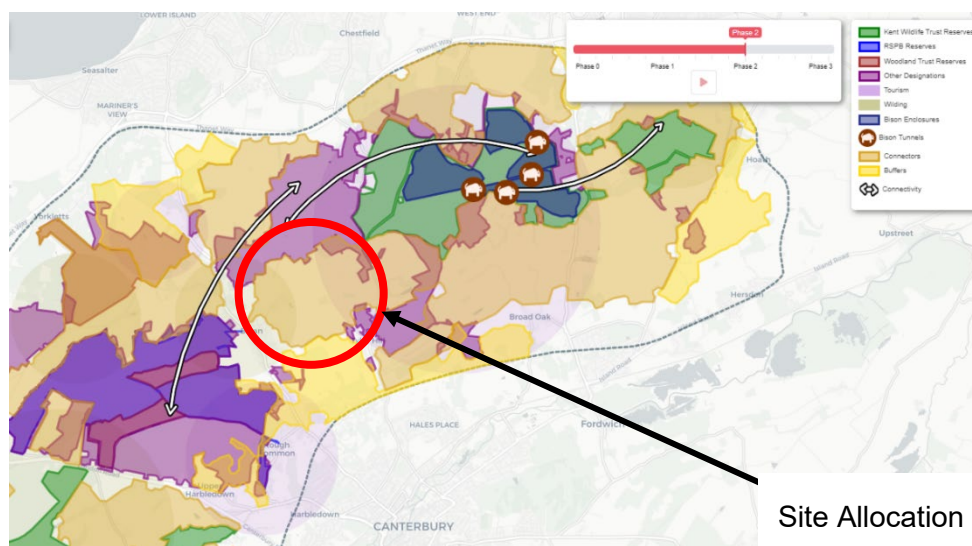


Figure 9: Extract from Wilder Blean Complex Vision Map

- 5.8 Given the scale of the proposed development, it is envisaged that the air pollution likely to be produced would have a detrimental impact on the biodiversity of the surrounding area. Specifically, the air pollution produced from the additional vehicular traffic would affect the Special Area of Conservation of Blean Woods. Within the Canterbury City Local Plan (2017) it is stated that there should be no further decreases in air quality along Blean Road (A290) to ensure there is no detriment to the sensitive parts of the site. Furthermore, within the Sustainability Appraisal Report (2024) significant negative effects are reported due to the uncertainty of the impact air quality changes may have on the Blean Complex SAC. As such, it is reasonable to assume that any development is likely to have a detrimental impact on the Blean Woods due to the substantial decrease in air quality which is anticipated with a major development. Therefore, Policy C12 would not accord with the policies outlined in the Local Plan and should be removed from the Draft Local Plan.
- 5.9 In addition to the above, it is noted that a number of protected species would be harmed by a potential development in this location. However, it is evident that little regard has been given to the potential impact on

protected species in this site allocation. Within Policy C12 no reference is made to the potential impact on Great Crested Newts despite the site being located within an amber warning area. In addition to this, no specific reference is made to the other protected species present on the site that would be impacted by the proposal including hedgehogs, slow worms, two species of bat, and skylarks, nightingales and yellowhammers, which are all red listed species. As outlined in **Table 1**, the Sustainability Appraisal suggests the impact on these species would only comprise a minor negative effect. It is considered that this effect has been underplayed and due to the extensive presence of protected species that would be affected by the site allocation, it would comprise a significant negative effect.

- 5.10 Given the reasons outlined in this section, Policy C12 should be removed from the Draft Local Plan due to its impact on the biodiversity and ecological features that are present on the site and in the surrounding area that would be negatively impacted by the proposal. Hence, this policy would not accord with national and local planning policy.

6.0 HERITAGE ASSETS

- 6.1 In relation to Policy C12 – Land north of the University of Kent, it is noted that the proposal would conflict with national and local planning policy in connection with preserving heritage assets. As outlined within the policy, the site is partially located within a Conservation Area and is within close proximity to a number of Grade II * Listed and Grade II Listed buildings. Part of the site provides the primary access route through the Hothe Court Conservation Area and the remaining site is adjacent to the Blean Conservation Area, Tyler Hill Conservation Area and the Canterbury and Whitstable Railway Conservation Area. It must also be highlighted that there are listed buildings and scheduled monuments within and bordering the site. Therefore, a **Local Plan Representation Statement on Heritage** has been prepared by WS Heritage which sets out the heritage concerns relating to Policy C12. Please refer to this document for further details on this.

7.0 FLOOD RISK

7.1 As part of Policy C12 – Land north of the University of Kent, it is important to consider the potential flood risk implications of the site which should be given due regard.

7.2 It is noted that the site is located within Flood Risk 1. Despite this, there are still flood risks associated with a development of this size. It is noted that there may be significant drainage implications given the size and scale of the development. Particularly, it is noted that several parts of the site are at medium and high-risk of surface water flooding, as shown in **Figure 10**. It is especially important to note that Figure 10 shows that a large part of the area allocated for the community hub would be at high and medium risk of surface water flooding, which is considered unsustainable and entirely unsuitable. In relation to this, reference should also be made to the Strategic Flood Risk Assessment published in February 2024 which states **“there is also a need to highlight flooding problems in the villages of Chestfield and Blean. At both these villages there has been localised flooding in the past due to a combination of causes. Particularly at Chestfield but also to a lesser extent at Blean, the upper soil geology is a thick layer of stiff London Clay with only a thin band of topsoil / soft clay overlying it, During periods of prolonged winter rainfall the soil becomes saturated resulting in water lying on the surface for long periods of time”** (Paragraph 5, Page 50). In addition, the assessment also confirms **“there has also been flooding from sewers (both foul and surface water) in recent years... at Blean”** (Paragraph 2, Page 51). This conclusion further demonstrates the unsuitability of this site for a major development as any proposal is likely to further exacerbate these existing issues. The Flood Risk Assessment also confirm that where a property is located in close proximity to the Sarre Penn, there may be a

risk of flooding. As such it is considered a potential development would only increase this risk.

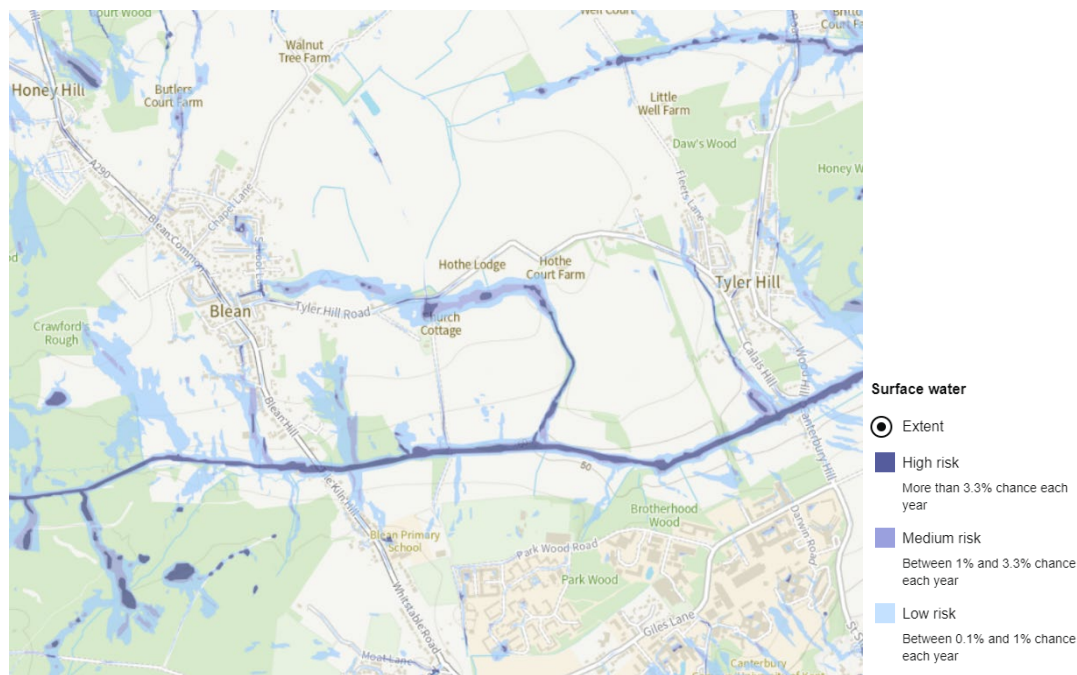


Figure 10: Extract from Government Flood Map to show extent of surface water flooding

- 7.3 Policy DM14 of the Draft Local Plan is titled ‘Flood Risk’ and notes that proposals will only be supported where a flood risk assessment demonstrates that **“surface water runoff is managed effectively and robustly, in line with Policy DM15, giving priority to the use of SUDS, and discharge locations have capacity to receive all foul and surface water flows from the development”**. It is considered that it would be extremely difficult for any subsequent planning application to meet the local plan requirements in terms of flooding, due to the extensive areas which are at risk of surface water flooding. Particularly, it is noted that according to geological maps, the area comprises London Clay with superficial deposits of head materials (such as gravel, sand, silt and clay).

For this reason, it is questioned whether a soakaway or field drainage system would work satisfactorily in this location.

- 7.4 In accordance with the above, it is considered that the constraints of the site in terms of surface water flood risk, demonstrate that the site is unsuitable for a large-scale development. In accordance with this, Policy SS1.8 of the Draft Local Plan notes that policies which increase the risk of flooding should be refused. Hence, Policy C12 should be removed from the Draft Local Plan, due to the potential flood risk implications that could arise from any subsequent application which could lead to widespread harm in the local area.

8.0 IMPACT ON COMMUNITY FACILITIES

- 8.1 In relation to Policy C12 – Land north of University of Kent, which is contained within the Canterbury City Draft Local Plan, it is important to give due regard to the impact that Policy C12 would have on existing community facilities. Particularly, the impact that this site allocation would have on Blean Primary School.
- 8.2 Within Policy C12 of the Draft Local Plan, it is suggested that to enable the proposed development, Blean Primary School would have to be relocated to enable the provision of the access road. Despite the proposed relocation of the primary school, it is noted that to date no Education Impact Assessment has been prepared or carried out as part of site allocation. As such, it is not considered that there is any sound evidence to support the relocation of Blean Primary School. For this reason, it is recommended that Policy C12 is removed from the Canterbury City Draft Local Plan as there has been no assessment of the potential positive and negative effects of the proposed relocation of the school and the impact this may have on existing and prospective pupils.
- 8.3 In relation to the above, it is noted that the relocation of a school to enable an access road to serve a development is an unusual proposal and according to the Department for Education is very rare, suggesting that this is often something which is avoided where necessary.
- 8.4 It is noted that the relocation of the primary school to enable the access road for a potential development implies that the site is unsuitable for major development, as there is no suitable location to provide vehicular access without resulting in harm to the local community. As such, it is requested that the site allocation is removed from the Draft Local Plan due to the unsuitability of the site and its potential impact on existing residents.

9.0 CHARACTER & APPEARANCE

- 9.1 In relation to Policy C12 – Land north of the University of Kent (Site Allocation), it is noted this policy would conflict with national and local planning policy in terms of character and appearance. The site allocation would result in a development that would be out of keeping with the rural character of the surrounding area. Ultimately, this proposal would result in the creation of a development that is not homogenous with the character of the surrounding area.
- 9.2 Within the NPPF (2023), it is noted that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside. In addition, within the Draft Canterbury District Local Plan, Policy DS4 makes reference to rural housing. Particularly, it noted that proposals for development would be permitted where **“development would be proportionate in scale to the existing settlement, appropriately accessible by sustainable transport, including by walking and cycling and the need for development outweighs any harm”** (Paragraph (d), Page 158). It is considered that Policy C12 would conflict with Policy DS4 as the development would not be proportionate in scale when compared to existing settlements. As illustrated in **Figures 11 & 12**, the neighbouring settlements at Blean and Tyler Hill are relatively compact and are reflective of the rural landscape. It is considered that the creation of a large mixed-use development would have a significant and detrimental effect on the character of the local area, which would entirely change its existing appearance. As illustrated by the photographs of Blean shown in **Figure 12**, the existing settlement is relatively spacious, with dwellings generally situated on large, spacious plots, which is characteristic of the rural landscape. Whilst it is acknowledged that there is variation in the design and appearance of the dwellings, it is considered that the provision

of 2000 houses close to this settlement would significantly alter its overall appearance, significantly urbanising the neighbouring settlements, disrupting their rural feel. As mentioned in Section 3, it is considered that the proposed allocation would result in the coalescing of the existing settlements that would drastically change the appearance of the rural landscape. Hence, the policy should be removed due to non-compliance with other policies included within the Draft Local Plan and the guidance contained within the NPPF (2023).



Figure 11: Google Maps Ariel Image to show proximity of site to neighbouring settlements



Figure 12: Images of housing in Blean

- 9.3 Whilst it is noted that the specific design of buildings and dwellings would not be fully detailed until a planning application is submitted for this site, it is considered that the overall scale and quantum of development would be unsuitable for this location. Subsequently, the proposal would be unacceptable in terms of character and appearance due to its excessive scale that would have a detrimental impact on the character of the site and neighbouring settlements.
- 9.4 Hence, it is argued that the site allocation would have a detrimental impact on the local character of the area, and as such, Policy C12 should be removed from the Draft Local Plan.

10.0 HOUSING LAND SUPPLY

- 10.1 In relation to Policy C12 – Land north of the University of Kent, it is important to give due regard to the contribution that this site would make to the housing land supply of the district. As part of this, we have reflected on the Council's five-year housing land supply position.
- 10.2 According to the latest housing delivery figures, Canterbury City Council is currently able to demonstrate a 5.3-year supply of housing as confirmed in their Authority Monitoring Report (2020-2021) (attached at **Appendix 1**). Given that the Council currently have a sufficient supply of housing, it is not considered necessary for this site to be allocated for a major development given the number of constraints on the site which have been illustrated above. It is noted that there are far more suitable sites located within the district which would enable the Council to meet their housing targets. Particularly, we would like to draw attention to the Council's Brownfield Register that is published annually which demonstrates the plethora of other sites within the district that are more suitable than the land to the north of the University of Kent.
- 10.3 Considering the above and given the availability of other more suitable sites within the district, the Council should not be reliant on this site and should seek the use of other more suitable sites that would not result in a detrimental impact on the surrounding area. Hence, it is not considered necessary to include the site allocation outlined at Policy C12. Therefore, this should be removed from the Draft Local Plan.
- 10.4 Given the reasons outlined above, it is considered unnecessary for this site allocation to be included within the Draft Local Plan given its surplus housing land supply and the number of other sites within the district that are more suitable than this site allocation which is demonstrated by the number of constraints of the land north of the University of Kent. As such,

this policy should removed from the Local Plan to ensure this area of high value green field land is retained in the countryside.

11.0 **CONCLUSION**

- 11.1 WS Planning & Architecture have been instructed by Save the Blean to submit representations in connection with the Draft Canterbury District Local Plan Regulation 18 which was published in March 2024.
- 11.2 The representations contained within this submission relate specifically to Policy C12 and demonstrate why the land to the north of the University of Kent is an unsuitable allocation for a comprehensive mixed-use development. This submission has reviewed the various detrimental impacts that would be caused should this policy be taken forward and included within the Local Plan. As such, it is considered that Policy C12 should be removed from the Draft Local Plan.

12.0 APPENDICES

Appendix 1 Canterbury City Authority Monitoring Report 2020 - 2022

APPENDIX 1

Addendum to Authority Monitoring Report

April 2020 to March 2021

Housing Delivery Test Results

This statement supersedes paragraph 4.14 in the Authority Monitoring Report and paragraphs 1.5, 3.3, 3.5, 3.6 and 6.2 as well as Table 3.1 in Appendix E: Housing Land Supply Statement.

For 2020/21, Table 1 below identifies the number of homes required over the last three year period and the corresponding housing completion figures.

Table 1: Last three years housing requirement and completion figures which inform the 2020/21 HDT (supersedes Table 3.1 in Appendix E Housing Land Supply Statement)

HDT	2018/19	2019/20	2020/21	Total
Housing requirement	900	824 ¹	599 ²	2,323
Total completions	444	602	463	1,509

The Housing Delivery Test (HDT) results for 2020/21, published by the government on 14 January 2022, show we have achieved **65%**.

We will shortly be reviewing our Housing Delivery Test Action Plan³. However, we do not expect this to be a long-term issue.

Housing Land Supply Calculation

This statement supersedes paragraph 4.11 in the Authority Monitoring Report and paragraphs 1.5, 4.1 and 6.2 as well as Table 4.1 in Appendix E: Housing Land Supply Statement.

The same phasing assumptions and methodology set out within the published 2020/21 AMR was used except the 5% buffer has been updated to a 20% buffer, as required by the HDT result.

¹ 2019/20 housing requirement figures have been decreased by 31 days (a month), by government to account for the country going into National Lockdown during March 2020. Further information is available from: <https://www.gov.uk/government/publications/housing-delivery-test-2020-measurement>

² 2020/21 housing requirement figures have been decreased by 122 days (4 months), by government to account for the COVID-19 pandemic. Further information is available from: XXX

³ Canterbury District 2018/19 and 2019/20 Housing Delivery Test Action Plans are available on the councils website or from: <https://drive.google.com/drive/folders/1IGeX9bc1xlbk5ksy0bxuUhrUqA4eZEYK?usp=sharing>

The council considers there is a housing land supply of **5.30 years** which equates to a surplus of **351 units** over the 5-year period.

Table 2: 5-year housing land supply calculation (supersedes Table 4.1 in Appendix E Housing Land Supply Statement)

Local Plan 2017 requirement 2011-31	16,000
Total completions from 01/04/11 to 31/03/19	5,624
Completions from 01/04/19 to 31/03/20	330
Student comps from 01/04/19 to 31/03/20	117
Care comp from 01/04/19 to 31/03/20	27
Residual requirement	9,903
Number of units required 2020-2031 (remaining 11 years) pa	990
5 year residual requirement (5x PA requirement)	4,951
20% buffer (equals 5 year residual x 20%)	990
Residual requirement + 20% buffer	5,942
Annual requirement including any shortfall + 20% buffer	1,188
Components of 5-year supply from 01/04/20 to 31/03/25	
Strategic and other new allocations	3,989
Planning permissions	1,125
Windfall allowance	176
Students	570
Care homes	432
Total 5 year supply	6,292
District-wide 5 year supply	5.30
Surplus	351