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

The C12 plan for land north of the University is highly inappropriate, lacks sufficient data and assessment plans and should not be included in the District Plan. Most alarmingly, the C12 plan ***totally contradicts*** the findings from the Canterbury City Council July 2022 Strategic Land Availability Assessment and the guiding principles and commitments made by the University of Kent in its 2019 Master Plan and its 2025 Strategic Plan. It is incomprehensible what material changes have taken place between the publication of these documents and the March 2024 Draft District Plan to make both Canterbury City Council *and* the University of Kent depart so radically from their previous priorities, commitments and conclusions.

**2022 Strategic Land Availability Assessment**

The Canterbury City Council [Strategic Land Availability Assessment carried out in July 2022](https://www.canterbury.gov.uk/planning-and-building/new-local-plan-2040/strategic-land-availability-assessment) found the five sites proposed by the University on land to the north of the University between the villages of Blean, Tyler Hill and Rough Common to be *“technically unsuitable”* for development. It found that all the sites had major access issues, with inadequate access and limited public transport options. For all the sites, the 2022 SLAA stated that: *“The site is located within an area with limited access to day to day services and public transport therefore future occupiers would be dependent on private car to access day to day services.”* Two of the proposed sites were in a *“conservation area”* and all five sites were found to have a “*landscape impact” “heritage and ecology concerns”*.

None of the features of the proposed C12 site have materially or physically changed between July 2022 and the publication of the new Draft Plan in March 2024. The site is still located on, or in close proximity to, Natural England Priority Habitats, Ancient Woodland, Local Nature Reserves, the Tyler Hill and Blean Conservation Areas, the Crab and Winkle Railway Conservation Area and Blean Biodiversity Area. The physical location of these areas has not changed between July 2022 and March 2024.

The C12 site still contains Scheduled Ancient Monuments; Grade II listed buildings; archaeological sites and earthworks – all sited as concerns in the July 2022 SLAA. These historic buildings and remains have not disappeared since July 2022. The proposed C12 site is still on Grade 2 & 3 Agricultural Land – as noted in the July 2022 SLAA. This agricultural land has not been reclassified between July 2022 and March 2024.

Tyler Hill Road remains an unsuitable access road for dwellings on the north side of Tyler Hill Road. As noted in the July 2022 SLAA it is a narrow, rural, windy road with no footway, cycle path, or lighting. Tyler Hill Road hasn’t changed in location or nature since July 2022: it remains an unsuitable access road for a major development. The Highway Assessment proposed in the July 2022 SLAA still hasn’t been carried out. Public Rights of Way and Public Footpaths still cross the land proposed for C12 development – it remains a much-used and loved local amenity – this has not materially changed since July 2022.

**University of Kent 2019 Master Plan and 2025 Strategy**

Moreover, the proposed C12 development is ***completely contrary***to the [University of Kent’s 2019 Canterbury Campus Framework Master Plan](https://media.www.kent.ac.uk/se/24163/BT_130341_Masterplan_editorial_magSynopsisV4.pdf). The Master Plan states that as *“The University of Kent in the Garden of England”* it’s spatial plan for the future *“reflects the desire to renew a commitment to landscape-led planning principles. It also expresses the University’s commitment to* ***conservation and environmental sustainability****, and to creating a campus that is* ***open and welcoming to neighbouring communities****, the City of Canterbury and to the people of Kent*.” In her foreword to the Master Plan, the Vice Chancellor, Karen Cox, explained that: **“*We have also worked closely with local stakeholders throughout as plans have taken shape, seeking advice from residents’ associations, community groups, businesses and the wider public.”***The [University of Kent 2025 Strategy](https://media.www.kent.ac.uk/se/13171/strategy-2025.pdf) includes a commitment to “Engagement, Impact and Civic Mission” stating that: ***“Our civic mission goes to the heart of who we are as a university and why we are here - to serve our communities by contributing actively and sustainably to their health, wellbeing, prosperity and success.”***

The introduction to the Master Plan states that: *“the City Council has confirmed that this Masterplan fulfils the local plan requirement for a masterplan to be prepared, and will provide a bridge between Policy EMP7 and planning applications,* ***as well as a framework for Canterbury City Council when* *determining development proposals.”***Stating that *“the University has a strong commitment to sustainability and carbon management, as well as an ambition to address the problem of climate change,”* the Master Plan pledges to: ***“Safeguard natural habitats and nurture biodiversity to enrich the campus and the surrounding area.”***

Referring specifically to university land in the Sarre Penn Valley, the Master states: *“Providing a green setting to the north of the University as well as a more rural landscape character, this area is a major attraction to students, academic staff and visitors.* ***Many opportunities exist here to enhance biodiversity and showcase the principles of sustainable land management, as part of the University’s offer of a green campus. These include preserving the connectivity of the bankside vegetation along the Valley as an ecohighway for fauna in the area, and linking ponds and wetlands to better reconnect the stream to its floodplain.*** *As well as diversifying the wetland environment, this will provide a reservoir for irrigation of the sports pitches during summer months, reducing the requirements for mains water.* ***Restoring the historic hedgerows to create wildlife corridors and managing existing woodland pockets will also diversify habitats and promote biodiversity.”*** Earlier in 2016 when the University of Kent was considering a [location for its new Business School](https://pa.canterbury.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZXGUEAID928&fbclid=IwZXh0bgNhZW0CMTAAAR1rMJdqgiJQngII1DvYjlH5HBNQ2we0Lcv3E9AgKlt19mOF032yUWcOplM_aem_AURdt4t1ExUArsWQLGM9q_zfBqOLFQyj90woUBlL53uwvWLXItmZ14DqURsp-q2a7xTwOo9c0S1IHasD-BxvxGuh), the architects dismissed land north of the University as an appropriate site stating that: “This area is highly visible from the open country side which extends northward from the campus towards Blean and development would be likely to have a significant impact upon the open character of the countryside to the north of Canterbury. The western part of the site is also identified in the Canterbury Local Plan as a ‘Green Gap’ where there is a presumption against development which would reduce the open character of this area.”

***So what has changed??*** Why has Canterbury City Council suddenly decided that the C12 development site is “technically suitable” for development and all the road access, public transport, environmental, ecological, agricultural, groundwater, cultural, and heritage concerns flagged in the July 2022 SLAA have suddenly disappeared?

Why has the University of Kent completely abandoned its civic mission to serving local communities ***“by contributing actively and sustainably to their health, wellbeing, prosperity and success?”*** In fact, the inclusion of the site C12 in the March 2024 Draft District Plan has had a hugely negative and detrimental impact on the health, wellbeing, and prosperity of local communities. Local residents in Tyler Hill, Blean, and Rough Common have described negative impacts on their mental health, sleepless nights, grief and depression at the prospect of losing much-loved nature and green spaces, concerns about the future value of their properties, and real concerns about their health and well-being as a result of increased air, noise, and light pollution created by the construction of such a huge development over many years, and the massive increase in local population and traffic. They also cite concerns about increased crime, road safety – especially for cyclists and pedestrians, and the future education of their children, likely to be seriously disrupted by the development. These local communities have always lived side-by-side with the University of Kent, and many residents of the three villages are either present or former students or employees of the University. But residents now feel totally betrayed by the University and Canterbury City Council. They feel their needs, health and welfare have been totally neglected and callously disregarded by the University and the City Council and there has been no attempt to meaningfully consult with them about these plans. The level of resentment and hostility towards the University amongst local communities that have previously lived harmoniously with it is incredibly high and it is difficult to imagine how relations will ever be restored if this development goes ahead.

Finally, why has the University of Kent totally abandoned its commitment to conservation and environmental sustainability and its pledge to safeguard the green setting and rural landscape north of the University, protecting nature and wildlife, creating wildlife corridors, and promoting biodiversity in the Sarre Penn Valley? And how do the commitments in the 2019 University of Kent Master Plan provide ***“a framework for Canterbury City Council when* *determining development proposals”*** when in reality the University is now proposing to sell off all this land for intensive, ecologically disastrous, environmentally damaging development? How can the University have decided in 2016 that this land was inappropriate for the construction of an academic building (new Business School) and now considering selling it off for 2,000 houses and other buildings?

There is an Orwellian disconnect between the very recent previous decisions and commitments of Canterbury City Council and the University of Kent and what is being proposed now in the C12 plan that is totally incomprehensible. Both institutions must be held to account to rigorously explain the data, analysis, assessment, and planning undertaken to have arrived at such a dramatically different conclusion for the future of the land north of the University in such a short space of time.

**Comments on Policy C12**

**C12 2.16** acknowledges that *"significant investment in movement and transportation infrastructure is needed to support delivery of the new rural settlement"* - is this even feasible or affordable for Canterbury?

**2.17** states that the *"new rural settlement"* will create *"large new areas of open spaces, creating signification separation from Blean and Tyler Hill and improved ecological connectivity to key natural assets in the area, including Blean woods".* This is completely untrue. The new settlement will DESTROY existing areas of open space; a massive urban sprawl of 2,000 houses will join up the villages of Blean and Tyler Hill; important wildlife corridors between Blean and Tyler Hill will be destroyed; connectivity between East and West Blean Woods will be broken; an area that is rich in biodiversity, rare and endangered plant and wildlife species will be lost forever. The ecological impact of this development on a rural area will be devastating.

**2. Design and layout: (f)** the impact on existing archaeological and historical sites will be devastating. Development all around the perimeter of the ancient church of [St Cosmus and Damian](https://www.bleanchurch.net/history/) will destroy its rural character and important Mesolithic, Bronze Age, Roman, and Medieval archaeological sites surrounding the Church will be permanently lost. The character of the existing [Crab & Winkle cycle path](https://explorekent.org/activities/crab-and-winkle-way-canterbury-to-whitstable/) along the route of the ancient Roman Salt Road between Sea Salter and Canterbury will be permanently altered – turning it from a rural cycle path to a city street. Important sites associated with the original [Crab & Winkle railway](https://crabandwinkle.org/past/) – the first ever passenger railway in the world, bringing day-trippers from Canterbury to the seaside in Whitstable and featuring ground-breaking 19th century railway engineering technology - will be completely subsumed within the development.

**3. Landscape and Green Infrastructure:** this section is nothing but euphemistic jargon and doublespeak which bears no relation to actual reality. It is pure *“Alice in Wonderland”* fiction.

a) What will be the impact of an *“urban drainage network”* on the existing *“valley formation running through the centre of the site?”* This valley is formed by the Sarre Penn river (stream). What will be the impact on the Sarre Penn of such a massive urban development? How will the Sarre Penn be protected from toxic waste pollution from the construction site and subsequently, how will the water quality be preserved with such dense habitation right next to a fragile waterway?

b) A massive concrete development on an existing green field site of natural beauty and rich biodiversity will result in a biodiversity LOSS not 20% gain: existing animal, bird and insect populations will be profoundly negatively impacted by massive construction and loss of habitat and either killed or lost forever – once displaced, they will never return. The massive concrete development will result in the LOSS of ancient woodland, green fields, hedgerows, grassland, heathland, ponds, and deciduous woodland. Suggesting that the development will “enhance biodiversity” is pure fantasy. The green fields, ancient woodland, streams, ponds and hedgerows on the site proposed for development are rich in biodiversity and provide a habitat for many rare and endangered species. Over 60 species of birds have been recorded in the area in the last 12 months, including sky larks, yellow hammers and swifts (on the RSB Red List of threatened species) nightingales, fire crests, linnets, gold crests, tawny owls, kestrels, buzzards, kingfishers (on the Sarre Penn stream), sparrow hawks, stonechats, siskins, redwings and rare sightings of a black kite and honey buzzard. Protected species of brown long-eared bats and pipistrelle bats roost near the Church and hunt for food in the woodlands, meadows and along the stream. Hedgehogs, badgers, foxes, field mice, rabbits, bank voles, weasels, grass snakes and slow worms also live in the area. The rare Great Crested Newt – also a protected species – can be found in multiple locations around the area of the proposed housing development. There are [internationally-recognised experimental ponds](https://www.kent.ac.uk/equality-diversity-inclusivity/wellbeing-map/lower-eliot-pond) for Great Crested Newts on the University site, close to the proposed access points. The habitats of countless birds, mammals, reptiles and amphibians will be destroyed, or severely disturbed, as a result of this massive development: birds and wildlife not killed will be disturbed, leave and never come back. The development will permanently sever connectivity and wildlife corridors between the East and West Blean woodland complex and prevent any further rewilding and enhancement of biodiversity as proposed in the [Kent Wildlife Strategy.](https://www.kentwildlifetrust.org.uk/wilder-kent-strategy)

d) “*Retain substantial areas of the existing tree cover and incorporate opportunities for landscape and biodiversity enhancements”* – this implies that some areas of existing tree cover will not be retained. Which trees will be retained? What will be the impact of the construction of such a massive development on the roots and drainage system of existing trees and woodlands in the area? How can the Plan “enhance biodiversity” when it will be destroying existing green fields, plants, trees, wildlife, birds, and insect populations?

e) How can the building of 2,000 houses in the middle of the Blean Woods area and Blean Conservation Area not have a profoundly negative impact on this important National Nature Reserve? The impact of massively increased traffic, air, noise, and sound pollution from a development site of 2,000 houses, 4,000 cars and potentially 7,000 more people will be immense. The proposed development site is one of enormous environmental importance and should be protected, not wantonly destroyed.

f) A huge “green corridor” already exists linking the villages of Blean and Tyler Hill to the University and City Centre. It is Orwellian to talk about “creating green corridors” when the District Plan intends to destroy them!

h) *“Minimize loss of or damage to ancient woodland at “Long Thin Wood”* implies that the C12 policy anticipates some damage and loss to this ancient woodland. Where are the details of how much woodland will be lost or damaged? “*Retain all other ancient woodland and ancient or veteran trees, ensuring they are not damaged nor is their future retention threatened”* – where is the impact assessment to rigorously demonstrate that there will be no damage to the roots, drainage system and stability of existing woodland and trees as a result of the proposed development? What will be the impact of heavy construction vehicles, air, noise and toxic waste pollution on existing woodland and trees? Will all the new trees planted by the University on the west side of the Crab & Winkle cycle path (between the Sarre Penn stream and the Church) be protected and preserved?

i) As point (e) above – how is it possible for such a massive development not to impact the Blean Woodland complex through increased traffic, air, noise and light pollution and massive construction vehicles?

j) As point b, d, and f above – how can the construction of 2,000 houses, office, commercial and businesses on a greenfield site and on the edge of a fragile watercourse (Saree Penn stream and its tributaries) possibly “*enhance biodiversity”?* The C12 development will destroy grassland, heathland, and deciduous woodland – not enhance it; the development will further fragment pieces of woodland, not *“expand and enhance them.”* Massive construction and dense inhabitation will likely result in pollution of the Sarre Penn.

k) What are the precise plans to “*conserve and enhance historic field patterns and features”* including earthworks St Cosmus and Damian Church, and other “*isolated boundaries and features representing the Medieval landscape pattern?”* Given that all the fields surrounding St Cosmus and Damian Church contain archaeological remains and earthworks from the Mesolithic, Bronze Age, Roman, and Medieval periods, how exactly can these be preserved and enhanced in the middle of a 2,000 house + office and commercial building planning development? It seems incompatible to preserve archaeological remains and landscape features, while at the same time proposing to concrete over them. Like the wildlife – once concreted over – they will be gone forever.

l) *“Preserve PRoW network across the site ensuring key views …are protected”* and ensure that the PRoW network is *“designed as part of a green ecological corridor.”* This is pure lunacy! The public footpaths across the proposed development site are only valuable because they provide a right of way through an area of great natural beauty and rich historical and cultural heritage. A public right of way through a concrete development site is just a pavement down a street of housing – to call it a “PRoW network” is completely disingenuous! The “key views” from the footpaths will hardly be preserved when all that can be seen is row after row of buildings. The “green ecological corridor” already exists – it is the unspoiled green land between Tyler Hill and Blean to the north of the University. The C12 Policy plans to concrete this over with buildings – it will hardly be a “green ecological corridor” anymore. This is pure nonsense!

m) *“Provide visual integration of development edges, through native wooded boundaries and mature trees to provide screening and reduce visual and landscape impact.”* This is ludicrous! The construction of 2,000 houses, office buildings and commercial sites will completely destroy any “visual integration”; existing wooded boundaries and mature trees will be threatened by the bulldozers and intensive construction; the “visual and landscape impact” can hardly be minimized when the policy proposes covering a green-field site with over 2,000 buildings.

**4. Access and transportation:**

a) The existing Crab & Winkle cycle route will be completely ruined by this development. It will become a cycle path down an urban street and will totally lose its rural character. The cycle path will likely be unusable for long periods during the on-site construction. The impact of air pollution on cyclists from the construction and increased cars will be detrimental. How are *“new and improved walking and cycling connections to Blean, Tyler Hill and Broad Oak”* compatible with the massive increase in cars on small, rural roads as a result of this development?

b) Plans for a *Transport Hub* to facilitate “*good access to public transport facilities”*  and a “*new bus route”* connecting the residential area to Canterbury West station and the City Centre are aspirational at best. There is no guarantee that this new development will be well-served by good public transport, or that people will choose to use it. Public transport services to Tyler Hill, Blean and Rough Common (apart from residents living on the Whitstable Road) are currently woefully irregular and inadequate. It is inevitable that this “rural settlement” will also be a “car-dependent” one as the 2022 SLAA predicted.

d) the primary access points to the site at the junction of Whitstable Road and Rough Common Road and at the site of the current Blean Primary School will massively impact on traffic flows in these areas. There are three large schools in the immediate vicinity of these access points (St Edmunds/ Kent College and Blean Primary School). How will the increased traffic at the access points impact on air quality and road safety for school children at these establishments? How will increased traffic, including heavy construction vehicles during the construction phase, make it safer and easier for pedestrians and cyclists in these areas, including for school children? How will a massive increase in cars, air and noise pollution, especially during the long construction period, impact the health and wellbeing of residents of Blean and Rough Common?

e) How will the C12 policy minimize traffic flow onto Tyler Hill Road in both directions, when significant sections of the new development will be on the north side of Tyler Hill Road with no access to Whitstable Road, except via Tyler Hill Road? How can the District Plan guarantee that motorists will not use Tyler Hill Road as a cut-through to St Stephen’s Hill and Canterbury city centre? What will be the impact of massively increased traffic in Tyler Hill, especially down Tyler Hill Road and Calais Hill where cars already go dangerously fast and there is no pavement for pedestrians or cycle lane for cyclists? What will be the impact on the “rural character” of the village of Tyler Hill, as characterized by the Canterbury District Settlement Hierarchy? How will a massive increase in cars, air and noise pollution impact the health and wellbeing of residents of Tyler Hill? Tyler Hill Road is a very narrow, windy, rural road which is already very dangerous for pedestrians and cyclists, with no footpath, cycle path, or lighting: how will it cope with the increased traffic from the C12 development?

f & e) *All-movement junction at A2 Harbledown through additional slip roads and highway improvements to Rough Common Road:* how will the C12 policy impact on the health and well-being of residents of Rough Common and Harbledown? What will be the impact on air quality with the massive increase in traffic? How can this road be made safer for cyclists and pedestrians when it’s already over-crowded and cars go too fast?

h) Provide a *“transport assessment to demonstrate the connectivity of the site with the existing highway network”* and necessary mitigation measures. Why is the transport assessment only happening *after* this site has been included in the District Plan? Shouldn’t a comprehensive transport assessment be a precursor to including the C12 site in the District Plan? There is insufficient information, data, and analysis of the transport implications of this site to include it in the current District Plan.

**5) Phasing and delivery:**

How does the Council intend to provide access to the construction site via the Blean Primary School access point before a new Blean Primary School has been constructed? What will happen to the school children at the current Blean primary school while the new school is being constructed? What will be the impacts on primary school children of the new construction? Has there been an assessment of air quality impacts from heavy construction vehicles on the primary school? 5(b) states that “secondary access should be delivered…prior to occupation of 300 dwellings” but 5(g) says that the new primary school site should be transferred to KCC “prior to the occupation of 100 dwellings” and 5 (h) says that the new Blean primary school should be ready “prior to the occupation of 25% of the total dwellings.” Which is it? It is conceivable that secondary access will be needed to the site before the new primary school has been completed – potentially resulting in serious disruption of the students’ education. Moreover, there is a discrepancy in the development plan (under Development Mix). Point 1 (3) (ii) states the “provision of a new 3FE primary school”, while point 1 (3) (iii) states “re-siting and provision of a new 2FE primary school” to “replace existing capacity at Blean Primary School.” Which is it? Does the City Council intend to provide a 2FE or a 3FE primary school in Blean? Is funding for a new primary school already secured?

**Conclusion:** The C12 development proposal is ill-thought out and extremely damaging to the local environment and important heritage sites. It will result in massive destruction to local green fields, woodland, plant, animal, bird and insect species and result in a huge loss in biodiversity. It will severely impact an area of considerable historical and cultural importance. It will result in a huge increase in traffic, air, noise, and light pollution in a currently unspoiled natural environment and will seriously harm the health, wellbeing, and welfare of the local communities in Blean, Tyler Hill and Rough Common. **It is a dangerous and damaging proposal and should be removed from the District Plan.**