

Tom Hawkes

From: Jeremy Kendall [REDACTED]
Sent: 20 October 2025 18:34
To: Consultations
Subject: The proposed removal of Draft Policy C12 from the Local Plan (local plan focussed consultation round 2025)
Attachments: JK Submission to Local Plan draft may 2024 FINAL.pdf

--Email From External Account--

Dear CCC planning team

I write to endorse the decision to withdraw the Draft Policy C12 from the local plan. The evidence, arguments and reasoning provided in the consultation documentation, including the details set out in the matrix appended to the Topic paper, make this case well. However I would like to make two further points:

- I also endorse the position taken by the Canterbury Society which suggests the withdrawal of the approach should also be accompanied by a measure to proactively strengthen protections for the relevant land, and adjacent land that is needed to respect and nurture the Blean wood complex and its setting. I think the appropriate measure or measures should be determined by Canterbury City Council, working in collaboration with relevant expert stakeholders. But would also urge that some form of joint initiative with Swale Borough Council underpins any such measures and policies, for the obvious reason that the integrity of Blean wood complex can only be achieved if a more joined up approach is taken.
- I understand that, in setting out the reasoning for the decision at this stage, CCC has been constrained by the limits of word length and the imperative of communicating in a simple and brief way with relevant stakeholders, to refer to some, but not all, of the relevant factors in the consultation materials. I would urge CCC to also ensure that a more comprehensive and encompassing account is consolidated if this has not already been done. So as to take into account all the other relevant considerations which made Draft Policy C12 an incoherent, inappropriate and ill advised approach. This would include recognition of the following
 - Draft Policy C12 undermined that Local Plan's coherence and intelligibility in a systematic fashion, and also at the level of individual policy areas and enumerated policies. So, removing it strengthens the Local Plan accordingly.
 - The inclusion of Draft Policy C12 in chapter 2, relating to urban policy, rather than chapter 5, relating to rural policy, further obscured and obfuscated the issues. This problem is addressed by the removal of Draft Policy C12
 - There were at least 7 enumerated Policies in the Local Plan which directly contradict Draft Policy C12: these are Policies R11, R19, DS12, DS18, DS19, DS22 and DS23. At a higher level, 2 Strategic Objectives are also demonstrably violated (Objectives 3 and 6).

Policy consistency and coherence has been significantly enhanced by the removal of Draft Policy C12.

- The key Specific Areas where contradictions, incoherences and inconsistencies associated with Draft Policy C12, and/or where its policy claims were based on evidence and argument of an insufficiently high standard for such a fundamentally important long term planning policy statement, related to:
 - Rural policies
 - Habitats & Landscapes
 - Landscape character
 - The Blean Woods complex (there are many more ecological and landscape considerations other than those relating to the categorisation of “long thin wood” as “ancient”, as emphasised in the summary consultation documentation)
- In addition the failure of the Draft Local Plan to take into account the 2019 University Masterplan was an oversight, and should be revisited. The Masterplan committing the University - and CCC which supported and must now continue to support the plan - to protect and enhance the character of the Policy Draft C12 site as unspoilt open countryside; without residential or business development; for the lifetime of the current Local Plan. In this Masterplan, it is stated plainly in text, and expressed visually through maps, that this area must retain this character, with no residential or business/retail development (until 2040) whilst being made more accessible for the local residential and university communities. It is unacceptable that this glaring omission has been tolerated. The Canterbury Society response mentioned above aligns with this consideration.
- Multiple further limitations, weaknesses and oversights in Draft Policy C12 were highlighted in numerous other submissions made to CCC in the previous round of consultation. These included, for example, access and traffic/highway, geology and hydrology issues, and aspects of negative impact in terms of biodiversity and natural/semi-natural assets/infrastructure and heritage not considered in this submission. However, I think most of these factors (most notable, access and traffic/highway) have now been considered, or at are least implied as having been recognised, in the arguments and reasoning given in the consultation documentation for removing Draft Policy C12.

- The amount of exceptions, qualifications, and implausible “special case” pleadings in favour of Draft Policy C12 was so high, and its complete incompatibility with the 2019 University Masterplan so plainly obvious, that its inclusion in the Local Plan had undermined that document’s integrity and meaningfulness. Its removal therefore addresses these problems and strengthens the Local Plan accordingly.

In case it is helpful to flesh out any of these points in more detail, for your convenience, please find attached the document I compiled to support this analysis in the previous consultation.

Yours sincerely

Dr Jeremy Kendall

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