

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
CT2 9LU

By email only: consultations@canterbury.gov.uk

20 October 2025

Dear Sirs

Consultation Response to Canterbury City Council's Draft Local Plan

1. Executive Summary

This letter provides a formal response to the Draft Local Plan consultation, focusing on Policy C12, housing allocation, and Policies N4, N5, and N11–N14. I support the removal of Policy C12 and endorse the strategic direction of the new housing and infill policies. I also raise concerns about the suitability of the Northern Land Holdings (NLH) site for residential development.

2. Objection to Policy C12 and Site Unsuitability

I fully support the decision to remove Policy C12 from the draft Local Plan. The Strategic Land Availability Assessment (SLAA) and Sustainability Appraisal (SA) clearly demonstrate that the site is unsuitable for development. Key concerns include:

- **Access and Infrastructure Constraints:** The proposed development depends on new A2 slip roads at Harbledown, which have been deemed problematic by Kent County Council Highways and National Highways. The site promotor has not provided sufficient evidence to address these concerns.
- **Ecological Harm:** The proposed primary access would result in the loss of ancient woodland, including Long Thin Wood. This has drawn strong objections from Natural England, The Forestry Commission, and The Woodland Trust. The site promotor's revised evidence confirms the woodland meets the NPPF definition of ancient woodland, and compensatory measures such as soil translocation are not appropriate given the irreversible harm.
- **Viability Issues:** The secondary access requires the demolition and relocation of Blean Primary School, introducing abnormal costs. Combined with the lack of funding for essential

infrastructure, particularly the A2 slip roads, this raises serious concerns about the site's viability and its ability to deliver affordable housing.

Additional reasons the site is unsuitable for housing include:

- **Environmental and Ecological Concerns:** Proximity to Blean Woods risks habitat fragmentation and biodiversity loss. The proposed green gap and biodiversity corridors may not adequately mitigate ecological damage. The green gaps should have special protections created in the Local Plan to prevent future attempts to destroy them.
- **Infrastructure and Accessibility Issues:** The area lacks sufficient infrastructure to support 2,000 new homes. Increased population density will likely lead to traffic congestion and pollution.
- **Community and Social Impact:** The development risks overwhelming the small communities of Blean and Tyler Hill, changing their character and placing pressure on local services.

3. Support for New Housing Allocation and Policies N4 & N5

I welcome the inclusion of a new housing allocation policy in the draft Local Plan, particularly as it is underpinned by Policies N4 and N5, which provide a robust and sustainable framework for future development.

These policies are commendable for:

- **Promoting Sustainable Transport:** The transport strategy outlined in SLAA122 prioritises active travel, public transport integration, and reduced car dependency.
- **Infrastructure-Led Development:** Policies N4 and N5 ensure that housing growth is aligned with transport capacity, environmental constraints, and community needs.

4. Support for Infill Policies N11–N14 and Suggested Sites

I am also supportive of Policies N11, N12, N13, and N14 in principle. These infill policies offer a practical and sustainable way to accommodate modest housing growth while respecting the character and scale of existing communities.

Suggested locations for infill development include:

- **End of the Side Road off Downs Road (between Nos. 52 and 70):** This area may be suitable for development consistent with the blocks already located to the south side of Downs Road.
- **Land at the End of Hovenden Close (North Side):** This location could present a viable opportunity for modest infill development, in keeping with the scale and layout of nearby housing.

Yours faithfully



Robert Wildman