

Representation to the Regulation 19 Examination of the Canterbury District Local Plan 2040 Submitted by Harbledown and Rough Common Parish Council

18th May 2026

Introduction

Harbledown and Rough Common Parish Council is a statutory consultee in the Local Plan consultation process. The Parish includes the villages of Harbledown, Upper Harbledown and Rough Common, rural villages on the western outskirts of Canterbury which together have a total population of about 2,400. Each of the constituent villages has a clear identity separate from the city and its neighbours.

'Local character and Identity

The Parish contains 58 Listed buildings (57 Grade II and one Grade 1), of which the great majority are in Harbledown which, despite its proximity to the City, has a distinct character, with most of the village lying within the designated Harbledown Conservation Area. Upper Harbledown and Rough Common are separated from the City by protected green space, and both directly adjoin the Blean Woods Nature Reserve.

District Settlement Hierarchy classification of Harbledown

In the present Draft Plan, in the District Settlement Hierarchy, Harbledown is classified, along with Rough Common, as a 'Local Service Centre' (Policy R13) despite the fact that, with the village pub now closed, Harbledown has no services other than St Michael's church and the church hall, which is owned and managed by the Church and is only limitedly available for use by members of the local community. Although there is a private, fee-paying primary school and a day-nursery, both are outside the main village envelope and neither mainly serves residents of the Parish. The Plan identifies Local Service Centres as settlements providing a meaningful range of services and facilities, typically including a shop, school, village hall and public house. Harbledown clearly does not meet those criteria. ' To ensure that the Plan is sound, Harbledown should be deleted from the list of Local Service Centres (Policy R13) and should instead be reclassified as a 'village' (Policy R20) in the settlement hierarchy.

Conservation and sustainability

The special and environmentally sensitive characteristics of the Parish make us especially alert to the need to preserve the special character and environmental sustainability of the city of Canterbury. We are concerned that the Plan should protect this historic city from overdevelopment that would aggravate existing serious problems with inadequate transport, water supply and waste-water infrastructure. Development in excess of the capacities of existing infrastructure would be to the detriment of the health and well-being of the local population as a whole, but it would impact especially upon environmentally sensitive peripheral communities such as

those of this Parish. The housing targets in the Draft Plan far exceed any anticipated local need, are inconsistent with Canterbury City Council's own Sustainability Plan and are manifestly undeliverable.

Water Supply

Parts of the Parish (principally Rough Common) suffer from chronically low water pressure and, especially in high summer, intermittent supply. The Council therefore supports the principle of the Broad Oak Reservoir (Policy SS6, j.) to enhance the resilience of the existing water supply. But the Parish Council strongly believes that this primary purpose of the proposed reservoir should not be compromised by extraneous proposals for a 'Country Park' with associated recreational facilities (Policy R24, 5.42). The Parish Council strongly supports the 'minimal impact' option for the proposed reservoir in order to safeguard water quality and minimise disturbance to wildlife and the tranquillity of this sensitive area on the edge of the wider Blean Woodland complex.

Drainage and Surface Water

There is growing local concern regarding surface water runoff and drainage capacity, particularly where permeable surfaces are replaced with hardstanding. The Parish Council requests:

Stronger requirements for Sustainable Drainage Systems (SuDS).

No increase in discharge to the public sewer network without mitigation.

Resolution of existing drainage issues prior to further development. Restrictions on the paving over of gardens to provide parking for vehicles.

Transport policies

We endorse the Plan's encouragement of sustainable and active travel, but we are sceptical that the ambitions for a significant modal shift in travel can be realised. We are acutely aware that, as villages on the periphery of Canterbury and with limited and unreliable bus services (Harbledown and Upper Harbledown) and no public bus service at all (Rough Common), most local residents will remain substantially dependent upon private cars in order to access services and employment. Measures to discourage the use of private cars will disproportionately penalise residents of villages such as ours. Nevertheless, we are concerned that additional housing developments to the north-west of the city would increase the number of vehicles using Rough Common Road and Whitstable Road, roads which are already busy and at or over capacity at peak times. The capacity of these important local roads should be recognised as a material constraint upon additional housing development. In particular, it supports a strong case against any large-scale development such as has been proposed for lands North of the University of Kent.

Strategic Sites and Infrastructure

The Parish Council supports a strategy that protects our much-loved open spaces and directs the majority of development to sustainable urban locations and larger rural service centres, rather than smaller settlements with limited infrastructure and restricted transport options. The Parish Council supports the protection of designated green gaps to prevent coalescence between settlements and to safeguard their individual character and identity. The Parish Council supports Policy DS12; net zero carbon-ready development, water efficiency in relation to new builds, and active and sustainable travel. The Parish Council also supports Policy R20 (Section 4), protecting open spaces, green infrastructure, and promoting active travel, including the Public Rights of Way network.

The Blean Woodland Complex and National Landscape Extension

This Parish has a particular interest in any development / plan affecting the Blean Woods Complex. The Parish Council welcomes Policy DS27 for the Blean Woodland Complex but considers that further ambition is required. The Parish Council urge the City Council to support the proposal to extend the Kent Downs National Landscape to include The Blean and adjoining ancient woodlands through the Forest of Blean initiative.

This represents a significant opportunity to:

- Protect a nationally important landscape.

- Strengthen ecological connectivity between woodland areas.

- Support biodiversity recovery and the objectives of the Chalk to Coast initiative.

The Parish Council particularly supports the proposed green bridge across the A2, identified as a national priority, to restore habitat connectivity between woodland areas.

National Landscape designation would:

- Enhance protection of ancient woodland.

- Support coordinated landscape-scale conservation.

- Promote public understanding and stewardship.

Without this designation, the connecting landscapes remain vulnerable, and the opportunity to secure a coherent ecological network may be lost.

Endorsement of the Save The Blean Representation

Harbledown and Rough Common Parish Council has carefully considered the representation 'submitted by Save The Blean to the Regulation 19 consultation on the submitted Local Plan, and wishes to formally record its full endorsement of the points raised therein which, in the Council's view reflect a thorough, evidence-based analysis. In particular, the Council agrees with Save The Blean's conclusions

regarding the justification for the removal of former Policy C12, the cumulative impact of the former proposed allocation on landscape character, highway capacity and ecological designations and the case for strengthening Policies DS26 (Landscape Character) and DS27 (The Blean Woodland Complex) to provide more explicit protection for the Canterbury District Landscape Character Areas. The Council considers that Save The Blean's representation makes a constructive and proportionate case for the revisions proposed to the Plan, and urges the appointed Inspector to give it the serious weight it deserves.

Submitted on behalf of Harbledown and Rough Common Parish Council.

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