**Objection to Planning Application CA/22/02055: Land Southwest of Canterbury Business Park, Highland Court Farm, Coldharbour Lane, Bridge, CT4 5HL**

Barham Downs Action Group objects to this planning application, for the following reasons:

**The site is outside the scope of the adopted Local Plan and there is no nationally significant need for this facility that justifies harm to the AONB**

The land where this proposed development would be situated is outside the scope of the adopted Local Plan. This is the approved plan for development in the district that has gone through a full democratic process of public consultation, debate and ascent by elected councillors. Outside of this plan, the assumption should be against development – and arguably even more so when the proposed site is in an Area of Outstanding Natural Beauty (AONB).

When considering whether the development is in the public interest, it is important to note that AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation’s interest to safeguard them. As such, for a development to be considered to be in the public interest, the potential benefits must outweigh the national significance of conserving and enhancing the natural beauty of the AONB.

No evidence has been provided that this proposed development would be of ‘national significance’, to the extent that it would supersede the significance of conserving and enhancing landscapes deemed to be of equivalent quality to that of a National Park.

As per the National Planning Policy Framework, considerations for developing in an AONB must include the need for the development and the cost and scope for developing elsewhere outside the designated area. Yet the applicant has **not provided compelling evidence as to why these industrial production and storage facilities need to be located in an AONB**. As the Kent Downs AONB Unit have stated in their comments on this application, “**The need is based on the aspiration of the businesses involved rather than any specific national need for this type of facility, nor are there any exceptional circumstances that justify the harm to the AONB**.” The AONB Unit also comment that alternative sites in Medway do not appear to have been considered as part of the Alternative Sites Assessment, including sites at the Medway Innovation Park.

Overall, we implore the council to recognise the precedent this sets for further development in the AONB which fails to preserve and enhance its tranquility, beauty and landscape amenity. The applicant and CEO of HICO, Gary Walters, has publicly stated that “it remains his long-term ambition to create further accommodation and opportunities for rural and artisan businesses at the park” (‘Plans approved for winemakers Chapel Down to relocate production from Tenterden to winery near Canterbury’, KentOnline, 5th April 2023). We are anxious that this proposal, alongside the recently approved Brett concrete plant, represents a piecemeal attempt to create a series of smaller-scale ‘acceptable’ developments in the AONB at Highland Court, which ultimately amount to the same loss of culturally and agriculturally significant land as the overwhelmingly rejected Quinn Estates proposals back in 2018.

For the reasons outlined above, we urge the Planning Committee to reject this application and work to bolster protection of the AONB amid growing development pressures in the district.

**The development would undermine the heritage of the Highland Court Conservation Area**

The Highland Court Conservation Area is characterised by a historic context in which the Grade II\* listed Higham Court was the focal point for a wider estate, comprised of farmland and parkland. As Historic England have evaluated in their response to this application, “the continuity of agricultural use [informs] the essential character of the landscape, as one of working agricultural farmland with the estate formed around Higham Court at its heart.” Thus, in line with the statutory designation of Conservation Areas as areas of “special architectural or historic interest, the character of which it is desirable to preserve or enhance,” this application should be assessed in relation to how the development would preserve or enhance this character of continued agricultural use, in which Higham House remains a focal point.

The applicants have failed to adequately demonstrate how the proposed development of industrial production and storage facilities up to 13m in height, on current agricultural land, would preserve or enhance this historic character.

The applicants have attempted to mitigate these concerns by proposing to plant lines of ‘tree buffers’ around the site. Aside from the fact that these trees would take decades to grow fully and obscure the buildings, this practice would ultimately entail a drastic change in the appearance of the Conservation Area and AONB land when the trees are fully grown. Furthermore, it would not take away from the fact that, as Historic England put it, that “the construction of large industrial buildings would entirely remove an area of productive landscape associated with the Higham Court estate which makes a positive contribution to the significance of the Highland Court Conservation Area.” It would be unacceptable for the character of the Conservation Area, currently enjoyed by locals and visitors alike who use the North Downs Way and adjacent bridleway, to be spoilt by industrial buildings and neatly-planted rows of trees.

The applicants may attempt to persuade the Planning Committee to imagine the Conservation Area as one already characterised by industrial activity, due to the presence of Canterbury Business Park. Yet **only one industrial building currently lies within the Conservation Area, with the remainder of the designated land currently being maintained in accordance with the ‘continuity of agricultural use’**. This applies also to the field where this proposed development would take place. Approving this proposal would therefore amount to a significant departure from the historic character that the Conservation Area designation intends to preserve and enhance. We note that the Pre-Action Letter for Judicial Review submitted to CCC Planning was deemed arguable on these grounds, and thus we urge the Planning Committee to consider their responsibilities as custodians of the site’s heritage carefully.

**The operation of the proposed industrial site would be unsustainable, due to the increase in vehicle movements required, disturbance to protected wildlife, increase in pollution and loss of Grade 2 agricultural land**

The Transport Note associated with the application indicates that there would be 1,252 additional vehicular movements as a result of the development. However, there is no explanation given in the application’s Sustainability and Energy Statement as to how this industrial traffic – fundamental to the operation of a production and storage facility – amounts to sustainable development, which is a requirement under Policy LB1 of the Local Plan: “In considering proposals for development within the AONB, the emphasis should be on proposals that are sustainably and appropriately located and designed to enhance the character of the AONB.” Currently, the only appraisal of the sustainability of the development constitutes energy saving and resource efficiency measures within the industrial complex, rather than the vast fleet of daily vehicle journeys needed to maintain its operations.

The increase in local traffic and pollution will in turn affect other the safety and enjoyment of other users of public rights of way in the Barham Downs area, notably walkers, cyclists and horse-riders on Coldharbour Lane, on the North Downs Way and on bridleway CB324. While support for ‘improvements’ to the public rights of way in the vicinity have been requested from the applicants if the development were to go ahead, as I explained previously, any such improvements would be undermined by the loss of the site’s historic character as rural farmland and parkland that is currently enjoyed by PROW users.

Additional lighting and noise emanating from construction and operation of the proposed industrial complex would be a particular source of concern for the resident bat population at the site, which has been assessed to be important at the district level. Every species of British bat is protected under the Wildlife and Countryside Act 1981, and at least 6 different species were identified at the site in the Baseline Ecological Appraisal. This activity was centred around treelines, hedgerows and woodland edges: not deep in the woodland parcels, but those parts of them that would directly interface with the proposed development.

The site in question is Grade 2 agricultural land, which is assessed to be ‘Very Good Quality’. The relocation of industrial units to currently usable, very good quality farmland undermines domestic food sustainability by reducing the overall area of productive arable land.

**Lack of public consultation**

Lastly, we would like to put on record our disappointment at the lack of public consultation on this application. We ask that CCC consider suspending consideration of this proposal until after a period of further public consultation. The application was made at a time when local residents were commenting on several major local planning issues (Canterbury Draft Local Plan consultation, Brett concrete plant, developments in woodland in Adisham parish, major developments nearby in Dover district). After only hearing one week ago about the new Planning Committee Meeting on 25th July, we have had very little time to prepare our response.