4th April 2023

Your ref: CA/22/02055

Case Officer (Canterbury City Council): Jessica Harrison

Dear Jessica,

1. **Conserve Adisham’s Rural Environment (CARE) objects to this proposal.**
2. **We ask Canterbury City Council (CCC) to refuse this application.**
3. **This scheme should be returned to the draft 2045 Canterbury Local Plan-making process and re-issued as part of the regulation 19 draft to enable further public examination.**
4. Please see through the applicant’s claim that this scheme helps the ‘local economy’!

‘Local economies’ refer to economic and social systems that are part of a specific community. The point of a local economy is to help a community to reduce sprawl, congestion, wildlife, habitat loss and pollution of all sorts.

It is frankly laughable to suggest that the applicant’s huge scheme, can in any way, ever be part of the community. The community in this part of the district is rural, being in villages, hamlets and farms. Such a scheme will inevitably dominate and overwhelm.

This scheme is wholly dependent on road access. There can be no dispute that it would increase sprawl, increase pollution of all sorts, including particulate pollution, and reduce habitat. The scheme’s curiously outdated, near 100% reliance on motor vehicles also puts it at odd with the UK’s climate control policies.

The local roads, including the streets through Adisham and other local villages will become congested. Many of us remembered the packed meetings when a predecessor scheme was being promoted, including one in Adisham Village Hall when the promoter of that scheme was unable to explain to us why the country lanes and village streets should not become crowded as a result of his project. Nothing has changed fundamentally.

Praying-in-aid the North Downs Way by the applicant is ludicrous. The North Downs Way was created to show-case one of England’s most beautiful landscapes, the Kent Downs. SUSTRANS NCN (national cycle network) route 16 has similar aims and was designated because of the beauty of the route and because it is relatively car-free.

The future wealth of this area depends on the protection of its natural and historic wealth. This application is anti-local economy. If approved, it would undermine the natural capital of the local communities.

1. Conservation of the countryside and protection of the landscape – failed!

As is well known, when National Parks and Areas of Outstanding Natural Beauty were being nationally designated, the principle is that both categories are of equal quality in terms of landscape excellence. The separation into two categories was on the basis of suitable local government structures for the different areas selected by the commission. The Kent Downs AONB has been nationally judged to be on a par with England’s 10 national parks.

This scheme clearly does not need to be here and should not be here! It would damage the AONB and undermine the future wealth of this area which will be based on its beauty and natural wealth including the future production of food (the importance of which, our country now has renewed appreciation because of events elsewhere in the world).

1. The scheme goes against the draft and emerging 2045 Canterbury Plan

We feel sceptical that plan policy DS16 (Air Quality), which CARE supports, can be met. An Emissions Mitigation Assessment needs to be conducted now to prove that this huge development will be ‘air quality neutral’ and will not lead to a net increase in emissions. Section 4 of DS16 states: ‘Development which has an unacceptable impact on air quality, including sensitive receptors, will be refused’. Can the developer absolutely guarantee that his scheme will not cause plan policy DS16 be failed?

Can the developer absolutely guarantee that particulate matter (PM) will both meet current air quality standards and that PM pollution will be below the legal limit set for 2040 by the Environment Act 2021 and face punitive action if pollution rises above this legal limit?

CARE supports plan policy DM17 (Noise pollution & tranquillity), but sections 3 & 4 are hollow commitments in the context of this scheme. S5 of DM 17 is relevant: ‘Where any significant noise pollution cannot be adequately mitigated, a proposal will be refused’.

DM18 (Light pollution & dark skies), which CARE supports, again rings hollow in the context of this scheme. This scheme, out of town in the AONB and miles away from any urban centre, and S1 of DM18 are incompatible. How can S2(d), (f) & (g) possibly be met? \*S3 of DM18 reads ‘proposals for external lighting within areas of dark skies will only be permitted in exceptional circumstances’. So, on yet another ground, we ask the planning committee to refuse this application and return it to the draft plan.

DS21 – supporting biodiversity recovery – is a particularly ironic plan policy in the context of the plan. The applicant’s scheme is directly counter to this.

DS22 – landscape quality – the proposal, causing as it will, loss of a huge and prominent area of classic and historic, open North Downs landscape, means DS22 will fail.

**Conclusion**

The developer’s application has been insufficiently thought through, in terms of national and local policies. We urge the committee to refuse this plan and return it to the context of the emerging local plan to enable further examination of it, by officers and the public’.

CARE

4th April 2023

**CARE**(**C**onserve**A**disham’s**R**ural **E**nvironment) is a volunteer action group, active when there is a major threat to the countryside of our parish and to the rural character of our village. It came out of hibernation to oppose an existential threat, the LPA's plan scheme for a 3,200 housing-unit new town joining Adisham to our larger neighbour Aylesham (which neither community wants), ending our history as a separate, rural community. We also strongly support the local campaign against both construction work in ancient woodland and the stealthy conversion of existing buildings in such woods to dwellings. We also oppose large-scale developments on farmland in the Kent Downs AONB land, one of England's most beautiful areas. CARE is run by parishioners & villagers, with no pecuniary interest in the outcome of their entirely lawful and legal public interest campaigns. We use established procedures, the media and rational, fact-based argument. We are part of the community of the Parish of Adisham (the first known, surviving written reference to Adisham is from the year 623CE, so 2023 is the 1,400th anniversary of Adisham entering recorded history).

Chair: Phil Nice

Vice-Chair: Guy Steward

Secretary: David Conder

Website coordinator and photo-library curator: William Turrell

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<https://adisham-countryside.com/assets/default/care-local-plan-response-2023-02-v2.pdf>

<https://adisham-countryside.com/documents>