Planning reference: CA/22/02055

**Watch Over Adisham’s Woods (WOAW) objects to planning application CA/22/02055**

Our reasons for objecting to the application are as follows:

Significant negative impacts on local and district-wide ecology

The ecological baseline assessment for the proposed development site indicates the significance of this land as a habitat for multiple plant and animal species, which are shown to have importance at local and district levels.

One of these species is the White Helleborine orchid. This species is nationally rare, listed as Vulnerable on the GB Red List for Vascular Plants, and occurs within 50 metres of the proposed development site. It also occurs on the fringes on bridleway CB324 and would thus be vulnerable to any proposed ‘improvements’ to this right of way, or other disturbance to the ground surface associated with this development.

White Helleborine occurs in small numbers in woods to the south of Adisham parish. It is one of the rarest plants in our parish and the neighbouring parish of Bekesbourne with Patrixbourne. These outlying colonies, including the one at Highland Court, are significant for the long-term sustainability of the larger local population, as they expand its geographic range and genetic diversity, making the population of this vulnerable plant as a whole more resilient. **We are therefore greatly concerned at the risk entailed by development at such close proximity to this valuable colony at Highland Court, and its implications for supporting the broader local population of these plants, including in Adisham’s woods**.

Like Adisham’s woods, the proposed development site is also home to legally-protected bats and dormice, while great crested newts are also well-known to occur. The bat population in particular is identified as being of district-level importance. The circadian rhythms of bats are highly susceptible to disturbance through lighting and noise, which affects a wide range of their behaviours. The proposed development’s industrial operations would cause such disturbances at all times of day and night. **We are therefore greatly concerned at the impacts the development would have for the future of wider populations of bats, including in Adisham’s woods**.

The dwindling population of great crested newt at the site, identified by the ecological baseline assessment, is judged to be ‘locally important’. This species has statutory protection precisely due to the historic loss of habitat that continued encroachment by development has caused. Surely the priority should be protecting the habitat of this struggling population rather than potentially wiping out the population completely.

Harm to the character of the Kent Downs AONB and Highland Court Conservation Area

AONBs (along with National Parks) have the highest status of landscape protection and planning decisions should protect and enhance valued landscapes in a manner commensurate with their statutory status (Paragraph 174, National Planning Policy Framework). Major developments, according to the NPPF, can only be justified in ‘exceptional circumstances’.

Furthermore, Principle SD8 of the Kent Downs AONB Management Plan states: “proposals which negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the AONB will be opposed unless they can be satisfactorily mitigated”. It is therefore instructive that the Kent Downs AONB Unit has vociferously opposed this proposed development.

**WOAW wholeheartedly supports the Kent Downs AONB Unit in their opposition to this planning application and concurs with all their stated concerns and reasoning**. Proposed landscape enhancement could never mitigate the impacts of converting a rural, former agricultural field into an industrial site. Even as the size of the proposed development has decreased over its planning history, it is the tallest buildings that have been retained, some up to 13 metres in height (about the same height as the Clocktower on St. George’s Street in Canterbury). The additional number of vehicle movements resulting from the development would take the local number far above the baseline of the AONB, to the further detriment of tranquility. This loss of tranquility has added significance, given that the popular North Downs Way recreational route (part of the Via Francigena European pilgrimage route) lies so close to the site.

This development would have no tangible benefit to the local community that could justify ‘exceptional circumstances’. **The applicants confirmed in their most recent Transport Statement that the development “will be solely a production and storage facility, with no intention to provide public visiting facilities**.” It would hardly be a rural retreat for enjoying wine amid views of vineyard landscapes.

Some of the woods within our remit in Adisham lie within the AONB and several more lie within the ‘setting’ of the AONB, only 800 metres away from the site in question. Approving this development would set a dangerous precedent for planning decisions in what is supposed to be a quintessentially rural environment. We are already facing sporadic development of large buildings by owners of woodland plots in/adjacent to the AONB. **This proposal would add to a pattern of urbanisation that is severely undermining the status of the AONB in this vicinity**.

An additional factor to consider is that the site lies within the Highland Court Conservation Area. This land, associated with the neighbouring Grade II\* listed Higham Court, has historically retained its character as a verdant rural landscape of continued agricultural use. Indeed, within the Conservation Area itself, there is only one large building associated with the industrial park, and this building is not adjacent to the proposed site. **Even so, the proximity of the site to the rest of the business park does not lessen the statutory obligation of CCC to preserve or enhance the character of this Conservation Area which, as Historic England identify, is associated with the “continuity of agricultural use”.**

The development is outside the scope of the adopted Local Plan

**The proposed development site is not included in the adopted Local Plan for Canterbury district, which planning decision-makers are duty bound to be guided by**. The new Draft Local Plan, whose consultation ended earlier this year, is currently under review following a considerable volume of public responses. Until review of the public consultation on the Draft Local Plan has been completed, and a new plan has been approved by councillors, it should not have any bearing on the consideration of this planning application, regardless of its content in relation to Highland Court and Canterbury Business Park. For a Draft Local Plan to guide a current planning decision would show contempt for the communities that CCC exists to serve. It would also disregard CCC’s statutory duties in relation to plan-making, as outlined in Section 19(1B) – (1E) of the Planning and Compulsory Purchase Act 2004 and Paragraphs 15-37 of the National Planning Policy Framework.

Lack of public consultation

The original application was made a time when several other local planning issues had taken centre stage. For WOAW, our time was divided between responding to appeals against enforcement notices issued to owners of woodland plots for development in Oxenden Shaw and Woodlands Wood. An even more pressing priority was the consultation for the Draft Local Plan, in which the R1 proposal represented an existential threat to the future of Adisham’s woodlands. As a group of volunteers, we did not have capacity to respond to this application as well.

We were only informed one week ago about the quashing of the previous approval of this application and the Planning Committee Meeting on 25th July for re-considering it. This has barely been long enough for us to formulate a response, and most members of the public will have been informed even later (the Kentish Gazette ran the news story on Thursday 20th, KentOnline on Friday 21st). We therefore urge Canterbury City Council to suspend further consideration of this application until after a period of public consultation.

For the above reasons, we object absolutely to this proposed development.

Watch Over Adisham’s Woods

24th July 2023

About Watch Over Adisham’s Woods

*Watch Over Adisham’s Woods (WOAW)* is a diverse group of local volunteers seeking to watch over, cherish and protect all woodlands in the parish of Adisham. In our parish, there are 12 registered ancient woods, 5 being located within the Ileden and Oxenden Woods Site of Special Scientific Interest and 5 within the Kent Downs Area of Outstanding Natural Beauty. We work in collaboration with the owners of several of these woods to record and monitor flora and fauna, report and resolve issues (e.g. dumping of waste, unlawful use of public rights of way), share information with the local community and ultimately find ways to celebrate the beauty and tranquillity of the woods. Our aim to protect these irreplaceable, ecologically-rich habitats has extended to opposing harmful building development, which has occurred since 2020 following the subdivision and sale of the two ancient woodlands bordering Woodlands Road. In this work, we operate in close communication with CPRE Kent, Kent Wildlife Trust, the Woodland Trust, the Kent Botanical Recording Group, Rosie Duffield MP and local councillors.

**WOAW website:** <https://adishamwoods.co.uk/>