

From: William Turrell, 3 June 2024

This is my **personal response** as a district resident. [REDACTED]

I also responded to the first (2045) consultation (by email, 5 page PDF) - my comments here are additional to that.

## **support SS1 environmental strategy**

I particularly support:

SS1.3 having a specific policy on recovery of Stodmarsh NNR

SS1.5 the 20% BNG target (rather than the required 10%).

SS1.6 minimum tree cover (if anything, I would like to see this apply to smaller developments)

SS1.7 the focus on green and blue infrastructure

## **support SS4 Movement and transportation strategy**

I support the transport strategy, in particular:

- the removal of both bypass schemes (Rough Common and Eastern Movement Corridor) on environmental grounds
- the focus on bus provision and park and ride
- the long-term improvements to railway stations including the additional entrances at Canterbury East and West
- a bus policy that includes demand responsive transport

## **support removal of old-R1 Cooting Farm Garden Community**

I'm grateful the council listened to the volume of opposition to the Cooting Farm development - in effect a new town - and chose to remove it.

This policy would have resulted in the loss of a large area of productive BMV farmland (much of which has already been lost to development in and around Canterbury), including trees and hedgerows.

It would have disturbed rare plants and protected wildlife, including breeding birds, bats etc. in several vulnerable SSSI woodlands - e.g. Ileden and Oxenden - which are classed as being in an unfavourable or unfavourable recovering condition - and increased footfall would have led to damage and erosion of the PROW network (as Kent Wildlife Trust pointed out in their last response.)

The level of car ownership would be high due to the distance from Canterbury and other towns - it is just too optimistic to assume majority use of the railway station due to the limited destinations and service patterns. The B2046 already has had many serious accidents and the development would have made regional cycle route 16 more dangerous.

Overall, most people would be travelling to the city on a regular basis, so the end result would be further pressure on the roads, also worsening the local air quality.

Bus services to Adisham are extremely limited (one bus a day, timed for school use) and Aylesham's are over capacity.

The volume of houses would have created surface run-off affecting the village of Adisham, which already floods in places along Station Road.

The "green gap" in Cooting would be too small to prevent the loss of village identity for Adisham, and it and Aylesham would effectively be continuously connected by this new town.

Light pollution would be visible from all around the site and further down the valley in Wingham.

In summary, CCC were right to remove this policy in full from the plan.

## **support removal of old-R20 Aylesham South**

This scheme would have also destroyed productive farmland. The promised country park would not have been enough to make up for the huge volume of housing from R1, R20 and Dover District Council's adjacent "south Aylesham" development.

Again, CCC made the right decision by removing this policy.

## **C9 - Milton Manor House**

I have not studied this policy in great detail, but I am worried about the general loss of green space and landscape character, in particular the driveway etc. (e.g. what I believe are Lombardy poplar trees).

C9.3(g) - it's unclear how Turtle Dove habitat can be protected or enhanced given the volume of houses in both C9 and the vast area of allocated land immediately surrounding it (carried forward from the previous plan).

Risk of contamination of groundwater is a concern.

## **C12 - Land north of the University of Kent**

### **Comments on wildlife and ecology**

I'm a member of Kent Wildlife Trust (KWT).

I encourage the council to give significant weight to whatever KWT may say in their response, given their expertise. Because they have nature reserves across the whole of Kent, as well as the Blean woodland complex, they will be capable of giving a detailed and proportionate view of the impacts of C12 particularly regarding the wildlife corridor between East Blean Woods NNR and RSPB Blean Woods.

On C12.3(i) - it is very hard to believe that this development will *not* "adversely affect landscape, ecology or setting of the Blean Woodland Complex" - that is a rigorous test, broadly defined, being applied to a huge development.

At face value it is also difficult to see how C12 as a whole is compatible with SS1.10 (extension and improved connectivity of Blean Woodland Complex).

*Should* C12 be adopted, it will be really important not to restrict wildlife movement, and also to allow residents (old and new) plenty of green space.

Additionally, this proposal is unique in being adjacent to a university with a highly regarded school of Anthropology and Conservation and "DICE" (the Durrell Institute of Conservation and Ecology). For the past four years they have run a "BioBlitz" day, which involves recording as many species of flora and fauna as possible within 24 hours on the university campus.

The council and developers therefore have almost unique access to a large volume of very current data snapshots, which were collected and verified by a group of highly proficient wildlife conservation students. The BioBlitz data should be front and centre when taking decisions about what further fieldwork to do and where, and when working through the BNG hierarchy.

I note the University of Kent appears to have made land available for development that includes their *Kent Community Oasis Garden* (aka *KentCOG*) - which is currently a partnership that includes several university departments, East Kent Mind and Whitstable and Herne Bay beekeepers.

The garden is in the area marked as the green gap, however because it is a project beneficial to the community I think there is a responsibility on both the university and CCC to give assurances on its future location and operation.

Note: the area just by the garden (including the tree-line northwest of it, bordering the playing field) has been the recent location for the BioBlitz bat survey (which this

year found the two main pipistrelle species) - so there will need to be bat surveys in the surrounding area as part of any baseline ecological assessment or environmental impact assessment.

## **C17 - Land at Canterbury Business Park - strongly object**

In brief - and attempting to cover both the previously approved planning application *and* the further expansion of the business park in the local plan policy, because the two are linked:

- firstly, the Council has wrongly approved an application for a winery (an industrial scale factory, rather than planting vineyards) on this site *before* the plan policy was even close to adoption (before the first Regulation 18 consultation was complete).
- in May 2024 a judge at the High Court stated the council breached its constitution in it's handling of the speaking arrangements for the planning meeting, misleading representatives of statutory consultees into believing they couldn't speak on behalf of their organisations.
- those consultees had wanted to speak (highly unusually, they said) in the first place because they disagreed with the way their own evidence was summarised in a (hurriedly prepared, in my view) planning officer's report, and wished to correct it.
- the proposed extension to the business park (including the already-approved winery) is entirely within the Kent Downs AONB (National Landscape).
- The NPPF says that any major development (which this very much is) within an AONB should be refused unless there are "exceptional circumstances" and it can be shown to be "in the public interest".
- There is no evidence of either exceptional circumstances or public interest.
- The facilities known so far (in the winery application) consist of a factory, storage and logistics - these are highly inappropriate for a greenfield AONB site, and should be on brownfield as per the council's brownfield first strategy.
- The scale of the winery has been chosen by a commercial winemaker with no independent oversight of their projections, which have changed significantly.
- The new employment projections do not specify how many jobs will be displaced from the winemaker's existing facilities.
- DS18.2 says development proposals within the AONB should not conflict with conserving and enhancing natural beauty and that scale, form, high quality design etc. should be addressed. It also specifically references the Kent Downs AONB management plan.
- DS22.2(c) refers to long distance views from vantage points, PROWs and national trails - Kent Downs AONB unit and Historic England have expressed specific concerns about this.
- The extra development will have an adverse impact on users of nearby PROWs, including the North Downs Way, in terms of appeal of using the routes, but also road safety (especially for horse riders).

- The arable farmland to be lost is classed as BMV (best and most versatile), and adds to the 550 acres to be lost south of Canterbury as a result of the Mountfield Park scheme.
- Much of the BNG mitigation is to be off-site, a long way down the list of preferred options in the mitigation hierarchy.
- > 240,000 sq. ft of warehouse space has become vacant immediately adjacent within Canterbury Business Park in recent months, due to the closure of a fruit packaging business. This represents a huge portion of the site reuse of this land should be fully investigated before expanding the business park outwards. There are no guarantees, given the economic situation and new European border restrictions, of a similar company filling it in the medium term.
- There are at least six bat species present in the area, but roost assessments have not been done on the woodland to the south west of the site, or any surveying of the land surrounding Higham Park.

## **R12 - Land west of Cooting Lane, south of Station Road, Adisham - object**

### **Brownfield land:**

The main reason I'm objecting is because I would much prefer to see a brownfield first approach (1.12) here.

I don't have any particular complaint about the size of the development, rather that all of the roughly ten housing units will be built solely on greenfield.

Specifically, just south of the red-line boundary, within the land evaluated in the SLAA, there is a derelict barn (plus a separate metal frame) with an access track from Cooting Lane.

The design of the barn is in keeping with the traditional style of Adisham (and its Conservation Area just to the west) including nearby buildings such as Manor Farm, Manor Oast and Holy Innocents Church.

Restoring it and putting it to good use, rather than leaving it to decay further, would be an enhancement.

Being a barn, the roof space is large enough that biodiversity features for protected species could be designed in - i.e. integrated bird, owl or bat boxes, and therefore accounted for in the BNG calculation.

## **Policy criteria comments:**

R12.2(b) see commons about barn restoration, above. I think it is important the buildings are of a style that doesn't look out of place in Adisham and has strong elements of rural landscape character.

R12.3(a) there are currently drainage problems at the bottom of Station Road, where it meets The Street and Bossington Road, after even short periods of heavy rain.

R12.3(b) I would strongly like to see all BNG mitigation *on site*. As mentioned, restoring the barn should make this easier (by reducing the initial amount of biodiversity loss, and allowing ecological features to be designed in).

R12.3(d) This should include but not be limited to hedgehog highways and planting of suitable hedgerow for hedgehogs, birds, bats etc. It is important if you are taking away wildlife habitat that not only do you provide "connectivity" but also food sources.

R12.3(e) I would like to see a substantial barrier to the west of the site as well, and it is not immediately obvious why the focus is on the southern boundary (there is, after all, a hedgerow already adjacent to footpath CB190).

Additionally, the positioning of the southern boundary on the indicative masterplan seems rather optimistic given the need for some sort of access road and front/rear gardens. It feels like the site would need to be deeper or a different shape.

R12.3(f) I support this new statement on protecting/enhancing the tree line.

## **Wildlife considerations:**

### **Summary:**

- there needs to be a breeding bird survey
- there should be a PRA (preliminary roost assessment) of the derelict barn (for bats, but also potentially owls and other species)
- all gardens should include "hedgehog highways"
- provision of additional hedgerow for food sources, nest habitat & to aid navigation

### **Detail:**

Observations mentioned here have been variously contributed to BirdTrack (run by the BTO), iRecord, and Kent Bat Group. Many in theory will eventually end up at KMBRC or the NBN atlas, but possibly after some delay.

Birds:

There are definitely breeding birds in the area (nests on the Station Road tree line as well as trees and hedges either side of footpath CB190, also nests in the trees by Manor Farm/Manor Oast to the west) and there would need to be a full breeding bird survey.

Bats:

There are at five species of bat (all observed since late 2023) in Adisham.

I am a member of Kent Bat Group and the Bat Conservation Trust. I have been carrying out surveys around the village (manual night-time bat walkovers of roads, PROWs, adjacent arable land, woods, and key locations such as the churchyard, recreation ground, railway station etc.) using heterodyne detectors and full spectrum recording.

Common and Soprano Pipistrelles are active to the north (Station Road) and south (footpath CB190) of R12. A brown long-eared bat was present over the winter in the churchyard. Daubenton's and Natterer's have also been observed elsewhere in the village. (I have used manual spectrogram analysis and peer review to separate myotis species.)

All species have Core Sustenance Zones (how far they go for food) that would make it highly plausible that they visit the R12 site to forage, or are commuting along the surrounding tree lines.

Horses are regularly kept in the field, which attract insects, and therefore bats.

Regardless of whether the derelict barn is included in the application, it is close enough that there should be a PRA (Preliminary Roost Assessment) of its structure.

Owls:

Tawny owls in particular have been observed this year at locations including:

- just north of the railway line (from CB190A)
- the area between the churchyard and the recreation ground (to the south)

Tawny owls often stick to the exact same location year after year.  
It is again possible they are making use of the derelict barn.

Other owl species have been observed around the village (e.g. barn owl).

Hedgehogs:

Hedgehogs currently use the verge on the northern red-line boundary for foraging, and it is my belief they are using the field itself as a wildlife corridor to connect with back gardens at the top end of the the Street (to the south and west of CB190).

Any development should include “hedgehog highways” - i.e. appropriately sized holes in garden fences (extremely cheap and easy to implement).

It is also important when planning the trees and hedges to use the British Hedgehog Preservation Society guidelines for species that will encourage hedgehogs.

Other mammals:

- There is an established badger sett by the railway station (last sighting late 2023).
- Foxes (last sighting: May 2024, in the field immediately south CB190)

Local Wildlife Site:

The churchyard of Holy Innocents Church is a KWT-designated Local Wildlife Site.

### **Station Road - road safety and parking**

There are constant (i.e. daily) issues with vehicles parking on the pavement on Station Road, this makes it less safe for pedestrians.

I don't think any development should proceed without sensible plans to alleviate this and ideally, slow down fast through traffic.

The section of Station Road closest to the proposed site is particularly narrow.

Traffic calming measures suggested have included chicanes and a mini-roundabout.

Station Road residents are keen for more parking on the opposite side of the existing bays, though I think this should be done cautiously and ideally avoid any loss of trees.