

Status: Canterbury district resident

Contact: 

SS4 – Movement and transportation strategy for the district

ANPR-BASED SECTORING SYSTEM

- strongly welcome idea of reducing congestion/pollution, however...
- overall view is that scheme is more complex than it needs to be and will require a lot of signage and cameras
- feels mistake for Canterbury to build a scheme in isolation. Economies of scale and peer-review from working with other districts and KCC. If Canterbury scheme to launch in isolation, local businesses would be at greater disadvantage.
- by time of implementation, possible the government may have suggested camera or GPRS based national road-pricing system. What happens to Canterbury's scheme then?
- believe it is only fair that scheme operational in hours when public transport is running, and waived in periods of disruption
- people aren't going to switch to public transport until services are running - the carrot is needed first, not stick

BUSES

- no roadmap for reducing bus air pollution
- council has failed to deliver a shuttle bus between Canterbury East and West (backed by multiple councillors at last election)
- concerned/sceptical about chances of improvements in bus provision, given KCC and Stagecoach cuts including recent loss of multiple Canterbury routes

C18 – Land at Station Road East

- people will be discouraged from using the railway station if the adjacent car park is removed.
- New Dover Road Park and Ride bypasses the railway station and calls at the city centre.
- trains will still be running when park and ride services have finished.
- Canterbury East is a major city railway station, dedicated parking is justified (also, what provision will remain for blue badge holders?)

R1 Cooting Farm

R1 should be removed from the plan (in its entirety).

WIDER PLANNING ISSUES:

- proposal in reality a *New Town* or major *hosting estate*, not a *Garden Village*.
- R1 conflicts with Policy DS18 (*Habits and landscapes of natural importance*) in that this is a *major* development which would *not* converse or enhance the AONB (e.g. proximity to multiple woodland areas, views from PROW network around the site) and would undoubtedly *endanger tranquility*.

- development effectively merges Adisham and Aylesham; however each half to be managed by different local authority - likely to lead to inconsistency, duplication or loss of services and disputes over responsibility for service provision.
- reasonable case for designating area between Adisham and Aylesham as a green-gap, "*to retain separate identities of existing settlements, by preventing their coalescence through development*". Green gaps should still be considered on local authority borders.
- CCC acknowledges it has no direct control over allocation of healthcare, education etc. Existing surgeries (e.g. Canterbury Medical Practice in Bridge and Littlebourne) already overstretched. Provision of utilities (especially water supply, drainage and wastewater treatment) also out of council's control with multiple existing problems (flooding, sewage, storm discharges). Climate change will make this worse.
- chosen site based on piecemeal landowner offers, R1 is not a "joined up" plan or a suitable site, nor is it big enough for the local facilities needed for people's daily needs.
- DDC not given prior notice of R1 and have expressed disapproval of it
- substantial part of the land included is not actually for sale, regardless, development on the remaining sections would be highly unsuitable

PREVIOUS COUNCIL COMMISSIONED REPORTS:

CCC themselves commissioned a "*Landscape Character and Biodiversity Appraisal*" by LUC in 2020 - see pages 277 to 282, "*section i1 - Adisham Arable Downlands*".

Relevant direct quotes from "guidance" on Landscape and Development Management:

- "Seek to enhance the arable landscape through management along margins for biodiversity and conserve remaining areas of pasture."
- "Conserve the traditional linear settlement form of Adisham in the chalk valley with a single line of dwellings along the road and views out between buildings to the rising slopes beyond."
- "Seek to ensure new development at Aylesham and along the Adisham Road in Dover District respects the rural character and quality of this area."
- "Conserve the visual links with the AONB ensuring that this area continues to provide a rural dip slope setting to the Kent Downs."
- "Avoid any development including large scale farm buildings in prominent locations such as on higher ground."

My assessment of R1 against guidance:

- area for pasture would be almost, if not entirely lost (remember cattle need multiple areas of pasture)
- rural dip slope no longer be rural, particularly when viewed from PROW CB188, or from Bramling Gap, from Wingham or indeed from Aylesham.
- village would no longer be a linear settlement, as, apart from a narrow 'corridor' alongside The Street, the 3,200 housing units + two commercial hubs would fill all available space.
- "rural character and quality" would be lost - the area would look like an high density urban housing estate from every angle.
- a substantial part of proposed development is indeed on higher ground (entire eastern edge and the highest land on southeastern boundary)

Elsewhere the report (again specifically referring to Adisham arable downlands) talks of:

"the strongly rural qualities of the landscape, with its mosaic of farmland and woodland with isolated farms linked by quiet roads."

All would be lost or undermined by surrounding development.

TRANQUILITY

- significant loss, both during construction phase (over many years, due to quantity of units and phased building) and after occupation of dwellings; noise from residents' cars, supermarket and parcel deliveries, weekly refuse collections. Planned number of homes is order of magnitude

greater than those already in Adisham. Noise carries far - traffic on B2046 already audible within village; noise new housing + commercial units would be too.

- construction phase will create high volume of lorry movements and result in congestion, large amounts of mud, debris on existing road network. Likely to involve cranes.
- rise in crime due to the population increase statistically inevitably; spillover effect into existing areas (Adisham, Aylesham, Wingham)
- after occupation, increased pressure on existing rural roads (including Adisham Downs Road, Woodlands Road,) every time there is disruption to A2. (Already happens but many more houses).
- development will impact existing PROW users - especially horse-riders, for need a noise-free, low-traffic environment for safety

FARMLAND AND RELATED LOSSES

- common knowledge UK faces significant shortfall of farmland, will be time consuming if not impossible to recover)
- land is not just used for arable but also grazing cattle
- loss of multiple hedgerows, despite government / Climate Change Commission target of 40% more hedgerows by 2050
- loss of existing Environmental Stewardship land
- loss of native trees
- disruption to pollinators (local area includes beehives)

PROXIMITY

- development on area SLAA262 in particular too close to existing homes
- area at southern end of plan, taking into account indicative margins shown on masterplan, extremely close to Pitt Wood/Woodlands Wood - buildings here certain to impact wildlife

VIEWS / LIGHT POLLUTION

- masterplan states valley views will be preserved, but this is only in one direction. High negative impact to views south-east from the north-west, including from PROW network (e.g. bridleway CB188/4 to CB188/5).
- Landscape Character and Biodiversity appraisal states: "The arable land use and woodland blocks provide seasonal variation with crop cycles and tree leaf growth, colour, and winter loss." No arable land will remain to provide this.
- dwellings will produce considerable light pollution (commercial zones more so) on an area of farmland currently pitch black at night. Light pollution especially visible from surrounding areas such as Bossington and Wingham and by its nature will be seen over hilltops etc.
- Light pollution will affect wildlife in woods. Potential collision of owls with glass panes (*Birdlife Australia* research).

TRANSPORT

- level of car ownership unlikely to deviate from Adisham village (over 90%); most residents will be reluctant to rely solely on hourly off-peak train service, and convenience stores in the "commercial zones" won't remove need for residents to make regular trips to local towns for larger shops, work, social/recreational activity
- measurable increase in noise and air pollution along B2046, which directly impacts Adisham, Aylesham, Wingham, Womenswold
- B2046 already congested in peak periods
- B2046 dangerous for pedestrians to cross (national speed limit and proportion of HGVs with long stopping distance.) Development likely to encourage movements between Adisham and Aylesham. Traffic signals will be needed for pedestrian safety which will increase air pollution, congestion due to braking, idling etc.
- Sample B2046 road traffic incidents at Adisham/Aylesham (source: Kent Messenger reporting)

Nov 2011 one death following three vehicle collision
Sep 2013 motorcyclist injured

Sep 2016	HGV driver killed after vehicle overturns
Apr 2022	pedestrian hit by lorry
Dec 2022	two car collision

- B2046 is on a national cycle route - increased traffic will reduce cyclist safety.
- other proposals in the plan, as well as those in the 2017 plan now coming into fruition (Mountfield Park etc.) will further increase traffic on the A2
- Adisham station not on HS1; Faversham-Dover Priory line generally treated as low-priority by ToC/Network Rail during periods of disruption; both factors make it an unattractive base for regular long-distance commuters
- southern end of site at least 30 minutes brisk walk from railway station, unsuitable for the infirm, those carrying heavy shopping etc. Considerably greater than the 15 minute target for *new* facilities (D57.3 *Infrastructure Delivery*).
- Aylesham residents consider their local facilities already highly stretched
- plan includes no provision / funding for additional bus services (Canterbury lost 7 bus routes in latest cuts).
- even with step-free access, station won't be an option for those with mobility issues but without a car, because they'll still have to get to the station first, and parking at station is very limited.
- Adisham station is unstaffed; lifts would require a staffed station. No suggestion of funding.
- council not in control of rail services (timetabling, train lengths) - no indication of funding for increased capacity or frequency
- nothing in plan about providing or improving bus services. recent KCC cutbacks give little confidence of new services. Existing daily bus routes finish early (6pm). Aylesham residents consider their bus provision inadequate.
- concept masterplan doesn't specify design of "greenway" (width, surfacing, whether lit or not)

WILDLIFE

- local species including owls, badgers, hedgehogs, rabbits, hares, foxes. Birds: blackbird, house sparrow, dunnock, great tit, blue tit, starling, green finch, pied wagtail, collared dove, wood-pigeon, robin, rook, thrush, buzzard sparrow-hawk.
- Starlings, green finch and house sparrow are on the 2021 UK red list (Birds of Conservation Concern) - i.e. in critical decline.
- Dunnock, sparrow-hawk, tawny owl, rook and wood-pigeon are on the UK amber list.
- Hedgehogs have declined 50% in rural areas since the turn of the century.
- plans use term "wildlife opportunities", however in reality, wildlife currently has free roam of entire site. After development, it will be restricted to narrow corridors, assuming it is not permanently deterred by noise, light pollution and general human activity. Net loss to wildlife, not opportunity.
- inevitably mature, native trees will be lost as part of construction
- no mention of tree or hedge planting to compensate for lost habitats
- biodiversity improvements not specified - hard to see how development will not result in a significant net biodiversity loss, given disruption or removal of existing habitats
- increased wear and tear on existing PROWs due to volume of housing units; especially in wet weather (surfaces likely to become impassable more quickly because of increase in (dog) walkers; UK dog ownership 25-35%, depending who you ask). Cuts to KCC PROW maintenance budget.

UTILITIES

- proposal talks of "sustainable drainage system" but provide no detail or confirmation of practicality/method of delivery.
- topography of land makes it challenging. Concern for Adisham village - much of The Street at around 30-35m, whereas area of development at Cooting Downs is 60-90m.
- already routine storm runoff onto Station Road (eastern end by station / railway bridge) and bottom of hill at Pond Green.
- frequency of intense periods of rainfall will increase with climate change.
- much opposition elsewhere (e.g. Mountfield Park) in district to existing/proposed of sewage "tankering" schemes.

- existing pressure on wastewater system which has led to regular discharge of sewage at sea (e.g. Whitstable) and pausing of city centre development in Canterbury.
- talk of "community heat system" is, at best, vague; struggling to identify a local example. suggestion phrased in way that acknowledges only suitable for part of site.
- seems unlikely properties will have sufficiently sized gardens for ground-based heat pumps
- unclear if area can/will be connected to gas network (national government strategy on gas/hydrogen etc. yet to be decided)
- unclear if additional electric pylons or underground lines will be required to support electricity grid. Construction would cause considerable disruption to surrounding areas.

R20 Aylesham South

R20 should be removed from the plan.

- loss of tranquility to Womenswold village
- "Country park" designation will not offset damage to habitat

QUOTES FROM LUC LANDSCAPE CHARACTER AND BIODIVERSITY APPRAISAL 2020

- "Womenswold is an ancient picturesque village with a main street lined with a variety of period houses".
- (from evaluation) "The strongly rural qualities of the landscape, with its mosaic of farmland and woodland with isolated farms linked by quiet roads"
- "Avoid any development including large scale farm buildings in prominent locations such as on higher ground."

RESPONSE

- proposed housing units in R20 are entirely on higher ground (~ 75-95m)
- R20 backs onto DDC's South Aylesham development, so impact is significantly worse. Overall, Womenswold will be heavily effected by combined traffic, noise and other impacts of R1, R20 and DDC proposals. Impact must be considered in the round, not individually proposals in isolation.
- no assurance of funding for proposed bus route, given recent KCC cuts. Existing route 89 capacity insufficient given R1, R20 and multiple Aylesham developments. Current timetabled hours (8:30am to 6pm) inadequate.

R22 Land West of Cooting Lane and South of Station Road

R22 should be removed from the plan.

The suggestion of building additional houses on Bossington Road instead of this site would be less disruptive and better for road safety.

- already considerable parking problems on Station Road, vehicles parked on pavement for much of length
- on street parking leads to insufficient room for cars to pass
- reliance on drivers slowing/yielding, yet many approach at speed (considerable fast through-traffic on Stating Road, from the Adisham Downs to the B2046 and vice-versa)
- cars emerging directly onto Station Road at right angles from new housing will be in greater danger
- already risks for pedestrians
- masterplan states "opportunities to improve cycling/walking access and safety" but makes any commitments - nothing in text mentions road safety (e.g. parking/driveway provision, sight-lines onto Station Road, consideration of speed limit reduction)

WILDLIFE

- Station Road / Blooden junction is established hedgehog wildlife corridor. Hedgehogs access field to the south via the vegetation on the verge (also a food source - insects etc.)
- this is arguably the safest place on Station Road for them to cross:
 - mostly flat (unlike slope to the west)
 - drivers slightly more likely to see them
- net 20% net biodiversity gain unlikely: vast majority of an existing greenfield site for use as dwellings, tarmac surfacing etc.
- text says "provide a substantial landscape buffer to the south of the site". How precisely is this specified? Indicative zone on concept plan could equally be described as "minimal", not "substantial".