

## Introduction

The following statements highlight the key issues, as I see them, and are supported by references to sources that confirm my statements. Each section can be read in isolation but together they represent the absolute necessity to reject the CCC local plan policy R22 and remove it in its entirety.

## Personal statement

My family and I moved to Adisham because we fell in love with the character of the village, the strong sense of community we saw in the local residents and the stunning local rural landscape. I am absolutely against the new local plan, which stands to wipe out these fundamental points which I hold so dear. The development proposed will hugely and adversely affect the village and the people who live here, of this there is no doubt. Surrounding Adisham is prime chalk downland used for centuries of farming and key to the history of the area, this must be protected for future generations, so they can experience the natural landscape and the setting of the village as it has been for centuries.

I suffer from often debilitating mental health which is kept under control by exploring the rural area in which I live. I walk the fields and in the seclusion of the woods; this lifeline for me will be forever destroyed by the development proposed.

## Character and history

As of this year Adisham has stood, in some form, on its current site for 1400 years. It is vitally important to protect the character and community of this ancient village by keeping it as this, a village. To build 3,200 houses within the current village limits would change the character of this close community immeasurably. Residents live in this community because they want a rural space, they want a village of character, they want peace. To have a town thrust upon them by those who have no understanding of this community and the character of our village is to wipe away what it is to live here and to change the community forever.

## Traffic on lanes and B2046

The B2046 is a busy thoroughfare between East Kent and the A2, with many lorries and cars using it. It is a road with the national speed limit but it is very narrow. Significant road traffic collisions occur regularly and we often see the air ambulance landing. I would say that the building of 3,200 new houses, each likely to have one or two cars commuting to work twice a day, means potentially 12,800 additional journeys on the B2046 each day. This is simply unacceptable and will put lives at risk; this road is not suitable for that level of traffic and there are no alternatives in that location. Dover District Housing and Employment Land Availability Assessment of 2022 dropped the plans for development on the land north-east of Aylesham (directly opposite the CCC planned site) for this precise reason.

The main road aside, the local lanes are not suitable for the significantly increased levels of traffic. They were built for slow moving vehicles decades, if not centuries, ago.

## Woods and SSSI

Ileden and Oxenden Woods (immediately adjacent to the planned development) are an SSSI and as such must be accorded the protection they deserve from the footfall of so many more inhabitants the development will bring. The unprecedented increase in people using the woods would inevitably cause the immediate environment to be significantly negatively impacted, with more people straying from the paths and dogs roaming over the significant numbers of nationally important plants in this SSSI. The nationally rare Lady Orchid is

almost completely confined to the chalk land of Kent and in the woodlands mentioned above are one of the country's largest populations. The Lady Orchid is on the GB Red List and has been designated as one of three Kent Biodiversity Strategy plants. There are also other nationally rare plants within these two ancient woodlands; the Narrow-Lipped Helleborine, the Lesser Butterfly Orchid, the White Helleborine, to name a few. This critically important site would be damaged by more footfall and as such we could lose yet another site from the dwindling list where these plants can be preserved.

Alongside the flora is the fauna, whose habitat would be severely impacted by any development. A recent survey put the number of red list bird species at sixteen and amber list species at twenty-six. The impact of the new development would only be negative to the woodland and its species, as the removal of the natural landscape and the ability of wildlife to move between sites limits breeding opportunities and feeding sites. No amount of 'natural' and 'semi-natural' spaces left by the development can be said to give these endangered and nationally important animals and plants the environment they have now and need to retain to continue to enrich the wild places for future generations.

The Natural England SSSI designation documents list twenty-eight 'operations likely to damage the special interest'. Six of these would be relevant to Policy R1, they are: 9, 10, 14, 21, 26 and 27.

#### Prime down land/farmland

The character of the Area of Outstanding Natural Beauty that is the Kent Downs continues around the village. This type of landscape is vanishing fast in the south of England and this is a scandal. There are no other parts of England, other than the south, which can boast this rolling farm land on chalk soil. In this setting, it is part of our wildlife and farming heritage and without it we face losing the character of our unique environment and a link to our past.

Wildlife on the farms around the village have a great deal of protection, not afforded them in built-up areas, which Adisham would become if R1 goes ahead. The stewardship of the local farms would be lost and we would not see the types and populations of flora and fauna we have now. This is not progress.

In 2020 Canterbury City Council commissioned a 'Landscape Character and Biodiversity Appraisal', in which Section 11 - 'Adisham Arable Downlands' is quoted below:

1. Seek to enhance the arable landscape through management along margins for biodiversity and conserve remaining areas of pasture.
2. 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.
3. Seek to ensure new development at Aylesham and along the Adisham road in Dover district respects the Rural character and quality of this area.
4. Conserve the visual links with the AONB ensuring that this area continues to provide a rural dip slope setting to the Kent downs.
5. Avoid any development including large scale farm buildings in prominent locations such as higher ground.

This local plan stands as the antithesis of the above quoted report. The plan must be scrapped and re-designed to meet the guidance of Canterbury City Council's own report.

The recent Biodiversity COP15 that took place in Montreal in December highlights the importance being placed on protecting biodiversity in national and international agendas. Biodiversity policies are being drawn up and implemented by businesses and governments alike, recognising the role biodiversity and nature based solutions will play in tackling challenges faced by climate change at international, national and local scales. At a local scale, the proposed R1 policy will clearly contradict the 'Landscape Character and Biodiversity Appraisal', commissioned by Canterbury City Council.

#### Farm land

The tenants of Great Bossington Farm on Adisham's far west side have lifetime tenancy for both themselves and their son. They were not consulted on this plan and have publically stated that they will not relinquish their land under any circumstances for development, their land is a major part of the local plan. They will continue to farm it and provide our country with the home grown food it needs.

#### Failure of CCC to adequately consult DDC on its plans

Dover District Council have not been consulted on this major new development plan directly on their boundary. This is underhanded, and possibly illegal.

#### Government targets not now required

Central government set housing targets are now to be considered as a 'starting point' 'but no more than that', with local authorities able to reduce the number of houses they need to build if they feel this necessary. The 3,200 new homes in Policy R1 is extreme overkill and can be scrapped and reconsidered in light of this new requirement from the Department for Levelling Up, Housing and Communities.

In Michael Gove's letter of 5th Decemeber 2022, to local planning authorities, he states 'local planning authorities will be able to plan for fewer houses if building is constrained by ... areas of high flood risk', this directly refers to Adisham should the development go ahead. Refer to the section below on water and drainage.

His letter also goes on to say 'Local authorities will not be expected to build developments at densities that would be wholly out of character with existing areas or which would lead to a significant change of character'. Again, this directly contradicts the plans in policy R1.

#### Water and drainage

Water in this part of Kent is scarce in the summer months and there are no plans, that I can see, for increasing the capture, storage and distribution within the local plan for 3,200 new houses.

This said, when it does rain, the new ground cover of tarmac, brick and concrete will funnel the water into surface drains, resulting in significant flow rates focussed on small areas. Surface drains will move the large volume flow rate downward into low lying areas, such as The Street in Adisham and further downstream, eventually to the Stour and Stodmarsh. This is an area which has been at the centre of significant debate for similar schemes elsewhere around the environs of Canterbury.

### Light pollution

It cannot be argued that the building of 3,200 new homes and the lighting of new local roads will not cause critical levels of light pollution. This will have an additional negative impact on those with mental health issues by compromising the dark skies around the area.