

## **Chapter 5: Rural areas development plan**

### **Policy R1: Land at Cooting Farm**

**What changes do you think should be made and why? Please provide any evidence you have to support your suggestions.**

**Evidence, that The Adisham New Town Scheme, R1 'Community garden scheme' (page 122) should be removed entirely from the local plan.**

The underlying principles of the R1 Cooting Farm Garden Community are entirely flawed and unsubstantiated. The plan takes the language of sustainability and community-led development, but holds none of the substance.

To inflict this development on the villages in question would be an entirely destructive act in the pursuit of profit by developers: sadly their say in the shape of our community currently seems to far outweigh that of our elected officials and their public service colleagues.

Because of this, the plan can only fall far short of providing the town planning elements it purports to champion. It also looks set to leave a range of unaffordable hidden costs for Kent County Council (KCC) and Canterbury City Council (CCC).

While the councils and planning teams are undoubtedly under huge pressure to build to meet the needs of the local population, this will not achieve that goal. There are far healthier and more cost effective models of development to explore.

There also appear to be issues with the way the consultation process has been applied, and a precedence set by some of the building companies involved for not fulfilling the obligations of similar contracts on which decisions to build have been made.

The plan would destroy completely the small historic village of Adisham, decimate its rich local wildlife populations and change the shape of the wider local area for good from a rural area nestled in the North Downs AONB, to a large housing estate.

**Evidence against the claim in the local plan (point 5.2 page 122) that the site plan was 'Prepared by the council in conjunction with key stakeholders and local community'**

The process has not been transparent or followed the council's declared consultation policy.

It is clear from the timelines of the announcement of this plan, and the subsequent launch of the consultation, that the rural areas development plan has not been prepared by the council in conjunction with key stakeholders or local community.

The council suggests in the local plan document that they followed the process of consulting with stakeholders. There is strong evidence to demonstrate that this was not the case.

The key landowners are on public record saying that they had no prior knowledge of this plan, and have not consented to the land being included. It is also notable that several

local councillors, including those who represent this area, went on record at the time of launch saying they were not consulted or aware previously of this significant proposal.

As a member of this local community I can also confirm that we were not consulted with during the preparation of this plan. The opinion of the Adisham parish and community has always been against high volume housing developments in the parish, as have neighbouring communities in Wingham, Littlebourne, Bekesbourne, Barham and Aylesham.

**Evidence against the claim in the local plan (point 5.2 page 122) that the site plan was 'Prepared by the council in conjunction with key stakeholders and local community'**

As well as a lack of consultation with the stakeholders described above, it has been suggested, again on public record, that was a lack of consultation with Dover District Council. If this is the case, proper process has not been followed.

**Evidence against the claim in the local plan (point 5.3 page 122) that the site plan has 'Sustainability at the core'**

There are some basic principles at the heart of sustainable design and community development (including those defined in the Rio Summit 1992). The plan described by CCC shares none of these. It has far more in common with a high volume mixed use housing development which we are already seeing all over Kent. This is especially jarring in the current context of COP27, and KCC and CCC's own declarations of support for sustainable business, travel and service delivery.

**Let's take each basic principle of sustainability in turn:**

**1) Environmental protection is a core pillar of sustainable landscape design:** the idea is to use natural resources without exhausting them and, where needed, contribute to their recovery for future generations. This plan will do the opposite. It will destroy rich wildlife habitats, including by urbanising five SSSIs. It will also destroy prime farmland, much of which is already managed to include wildlife stewardship schemes and all of which is a productive and vital natural resource for our community. At a time when the UK is facing huge challenges over the costs of food imports and has already lost much of our own means to produce food, this is completely unsound. To call this sustainable design is a fallacy.

**2) Social equity is another important element in sustainable design.** 'The aim is to maintain social cohesion' and this is connected to respecting the environment and the economic resources of a place. The plan in question, along with the other local sites identified under R20, R21 and R22, would do nothing to promote social cohesion and would completely destroy the currently cohesive and thriving communities of Adisham and Womenswold and leave Bekesbourne Bridge, Wingham, Barham and Littlebourne unrecognisable.

Taking other recent housing developments in east Kent as a guide to precedence, there is also no evidence to suggest that the claims of the 'affordable housing' in the plan will be meaningful.

Despite the pace of housing developments in the south east which we have already seen, the housing waiting list increased in 8 out of 12 Kent districts in 2021.

Elsewhere in England, waiting lists for social housing were 1.2% lower than the previous year. Rents in the South East are still higher than anywhere in the UK except London.

Even in developments with designated social housing there is currently a gap between the local authority housing allowance and social rents, pricing many people in need out of this market too.

Barretts homes, Britain's largest housebuilder, reported their private average selling price ('ASP') in their wholly owned forward order book as at 9 October 2022 was £377.2k, far out of reach for local people on an average wage.

There is also the question of predicted housing need: current targets for housing are pitched above the actual projected need. A recent report on [planningresource.co.uk](https://planningresource.co.uk) suggests a predicted end to government method of assessing housing need 'could reduce output in England to 140,000 homes a year'. It goes on to say that 'the forecast replacement of the government's standard method for assessing housing need with a "vacuum" or "soft" housing targets will likely lead to "a much-reduced level of housing provision", potentially cancelling out any boost to housing numbers delivered under the Truss government's proposed deregulatory agenda, according to a consultancy.'

Barratt Developments also reported a slump in reservations of new homes just three months ago, while Persimmon paused start on 30 sites as sales fall (as reported in the Construction Enquirer on 12 January 2023). The housing market continues to be hit by economic uncertainty and rising mortgage rates.

If the housing talked about in the plan follows this very familiar pattern in East Kent, then it will do nothing for social equity. It feels far more likely that the target market for the homes described will primarily be wealthy people from out of area, possibly commuters, and will do more to more to do supporting the flagging construction industry than local need.

There is therefore no evidence to suggest that the kind of housing development CCC are planning will fulfil this element of sustainable design.

The plan also talks about 'supporting net zero carbon emissions living'. Given the reliance on road travel which this housing development would undoubtedly promote (see below section on 'Garden Cities') and the destruction of a network of natural green spaces, this claim from the local plan cannot be taken seriously. Adding in the mention of cycle paths and footpaths does not change this. Especially not in the context of Canterbury City Council's current failure to provide the viable and affordable public transport links to this area, which are essential for low carbon living.

**3) Economic feasibility is a third central part of sustainable design.** The design and infrastructure of a place must meet the needs of that community without putting natural resources and the wellbeing of future generations at risk.

This means plans need to be closely related to the needs of the population and environmental limits. Leaving aside the fact that there has been no prior consultation on the needs of our community to help describe those needs, or involvement of us in these plans, it's still abundantly clear to see that by destroying the 1,500 year old village

community of Adisham with its farmland and historic natural landscape and thriving local economy and connected, vibrant and sociable neighbourhoods, and replacing it with a town, does nothing to protect it for future generations. The level of financial investment needed to create a new town, compared to better funding existing infrastructure and cities, is not economically feasible either.

There is a lack of any meaningful business or industry infrastructure in the plan to support new residents, and the land in question could not sustain this anyway. There are also countless examples of road and infrastructure costs which aren't covered by the plan and will still have to be met by local authorities. There is also a precedence locally for housing estates of this kind being built without standard services being provided by local authorities so homebuilders then pass the costs on to residents: this includes streetlights and landscaping maintenance costs.

Then there are the practicalities of the site itself - in terms of flood risk, lack of transport links, size for example. I am sure other residents and experts will go into detail on this for you in terms of the impossible logistics you would face with this build, but from an economic point of view these issues will place environmental limits which cannot be overcome by this plan and would place the significant burden of further hidden costs on local authorities and residents.

**Evidence against the claim in the local plan (point 5.4 page 122) that the site plan has a 'network of pedestrian and cycle routes, entering on an active travel corridor connecting to Adisham Railway station'.**

There is no definition given of an 'active travel corridor', and this is not a word in common usage. The term green lane is mentioned and is usually used to mean road. Without further detail on this route's surface and design it can only be interpreted as an access road between the housing development and the station. There is already an existing network of routes locally for walking, horse riding and cycling in this area.

**Evidence against the claim (point 5.6 page 122) that the plan for R1 follows garden city principals creating 'connected, vibrant and sociable neighbourhoods which support net zero carbon emissions living'**

As mentioned above, the existing community of Adisham is currently connected, vibrant and sociable.

What has been outlined in the Canterbury District local plan is, in my view as a resident, not in line with the core principles of site selection and developmental design for a garden city.

The site is unsuitable for many reasons. And the design falls far short of being able to deliver the promise of a garden city. It has far more in common with a housing development with some basic amenities.

The original concept of the garden city was a 20th century urban planning movement promoting satellite communities surrounding a central city and separated with greenbelt land. In the early 20th century, Letchworth, Brentham Garden Suburb and Welwyn Garden City were built in or near London according to this concept.

The garden cities were built on largely flat land between existing villages without swallowing them up. This allowed existing villages to maintain their identity. There was room for an industrial zone, and plenty of open green spaces. Development happened gradually and the style of the homes was rural. Housing association cottages were provided too.

As the planning team will know, (and in the words of Paul Swinney, from the Future Spaces Foundation): 'The garden cities movement is all about building cities somewhere completely new, with a great deal of green space, and with as low density as possible.'

This has two main implications. Swinney explains that, counter intuitively, 'Garden cities eat up more of the countryside than an urban extension would'. More travel has to be done to get from A to B within the garden city and this journey is usually done by car because of its lower density). More travel is usually also needed to get to where the jobs are, and these might be a long way from where the garden city is located.

We can see this clearly in Canterbury's proposed plan, which emphasises the train links to London and within Kent and the need for inclusion of new roads (which look to be rebranded as 'green ways').

We can also see this by the brief description of the community hubs (minimum 2000sq m), which talk about adding in community facilities with: a toilet and kitchen, shopping facilities, two new primary schools, plus Mobility Hubs which are usually used to 'bring together established forms of transport with new forms, such as e-scooters, e-cargo bikes, and demand responsive bus services'.

What is described in Canterbury City Council's plan is not a garden city, it is simply the development of green belt land.

The plan for R1 has much more in common with a mixed use housing development where a few community services will possibly be included but with residents still needing to travel into Canterbury or other cities in the region or London for many things. Existing transport connections to London and Canterbury are poor, so would also require considerable investment by local authorities or transport companies for even this kind of build to be viable.

Given the high costs and issues with reliability and frequency of public transport service which we habitually see in this area, it is hard to see how most of this travel would not be by road - which is in line with Swinney's point too.

The road system Adisham sits within is a network of small, narrow and currently poorly maintained country roads with sharp bends and no margins between them and local farmland to expand. The plan appears to show the inclusion of some new access roads, but does not cost out and describe how surrounding roads would be altered to take the high level of traffic Adisham would expect.

To update the network to cope with this level of traffic, represents a hidden cost to KCC, who are already in grave financial difficulty. It would also present a fresh problem for CCC to manage in the way of a wider net to worry about for air pollution (currently more of a concern in Canterbury itself).

For me, the answer to the housing crisis is not creating more garden cities, but improving the cities we already have in this area - Canterbury, Dover, Thanet, Ashford. This would be cheaper and more sustainable because it doesn't require the infrastructure to be created from scratch at a price to the local authority. It would also be better for the economy by providing much needed boosts to existing businesses. This is a view backed up by the Centre for Cities, the leading think tank dedicated to improving the economies of the UK's largest cities and towns.

Just walking down Canterbury's high street recently, it is striking how run down the city is now looking in places. There appears to be a high churn rate of businesses as well as the loss of many shops and facilities that have been there for decades and space standing empty. I understand there are plans for some of the city centre to be developed with luxury flats and hotels but it does not seem like there is a coherent plan to invest in the infrastructure needed to meet the community's needs and support existing services.

The policy by our local representatives should focus on is improving existing cities' use of space, liveability and sustainability. Not only is this cheaper (building a new city settlement with the infrastructure we need from scratch obviously comes at a high price, and the developers will only be covering some of that) but it would also be a better boost for the economy.

The other aspect of a garden city which I believe this plan can't deliver on is the idea that the community will be low density and sat among gardens and green fields. The choice of site would make this impossible.

The size of Adisham and Cooting, and surrounding landscape, is not on a scale that allows for maintenance of the green field character of the area at the same time as a development of this size and scale. What is described is not the siting of a new town in an area where it can be integrated as low density housing and amenities. The Canterbury City Council plan would mean a significant loss of farmland, fields and green space.

The sprawl of the development would leave negligible buffers between neighbouring communities and developments.

According to Brett Clark of the University of Oregon (published on the [jstor.org](https://www.jstor.org) website) the founder of the British garden city movement, urban planner Ebenezer Howard, 'advocated the construction of garden cities to reduce the alienation of human society from nature. The new towns were supposed to be integrated into the surrounding environment to promise a clean environment, free from air and water pollution, and an abundance of parks and open spaces.'

This is not what the plan describes. The site in question currently has all these qualities in abundance, but a development on the scale and nature described will leave it less clean, with fewer resources and with less abundance of green and open spaces.

Another element of the garden city is that planners make sure there is housing close to existing cities where there are jobs, to make employment more accessible for people and give businesses access to employees. The R1 site does not have the infrastructure to allow this.

Making more use of space for housing in Canterbury and the density would bring better opportunities. For example, our local businesses, especially knowledge-based ones like telecommunications, information technology, software companies benefit from being close to each other. Canterbury has many of these who could benefit.

### **1b Do you have any other comments on R1?**

The 1,500 year old small, close knit, separate, rural community of Adisham will be destroyed along with its existing ecosystems and negative impact on wildlife.

Construction on this site would have a damaging impact on the areas existing natural ecosystems and wildlife. There is cursory inclusion of some elements of design which give the impression this housing development will connect with existing green spaces and wildlife habitats. Sadly these cannot be meaningful given the scale of development on green space which we are talking about, even if they were to make it off the page and into the final build (which seems highly unlikely).

There has been plenty of rhetoric in the construction industry in recent years of biodiversity offsetting, where developers are allowed to destroy wildlife and landscapes if they create habitats elsewhere, or provide some sweeping views amidst the concrete. This plan has that feel, with its green-wash terminology.

There is very little solid evidence to support the idea that it is possible to offset the destruction of nature, however. In an article published in the Guardian 9 years ago Sandra Bell, from Friends of the Earth, was quoted as saying: 'Nature is unique and complex - not something that can be bulldozed in one place and recreated in another at the whim of a developer. Instead of putting nature up for sale, the Government should strengthen its protection through the planning system and restore wildlife across the UK.'

What a shame that this has yet to be taken seriously. What an even bigger shame that we are seeing a local plan which disguises a 3,200 house estate as a positive thing for the environment and community. It would have been far more transparent for the plan to have been delivered as a brochure for luxury homes aimed at commuters with views across the small remaining fragments of a once-thriving natural landscape. At least then we wouldn't feel misled.

### **The true impact on our community**

While the policy and practicalities behind the plan need responding to, we also need to share the personal impact this plan would have on our community. With planning teams stretched in the current climate, and many local authorities needing to hire consultants from out of area to put together and review plans of this kind, it may help to describe in some detail the landscape and community we are dealing with here.

Adisham is a small, unassuming village at first glance. Home to approximately 645 people. If you are passing through, whether you approach from north or south, you will enter via narrow single track lanes. The centre of the village is in the bottom of a valley, but the land rises in every direction - so steeply in parts that it is common to be snowed in for spells in winter. In the time I have lived here, the access roads I rely on have been gritted by the council once (in December 2022) after locals petitioned their councillor for help.

To the north west lie Adisham downs, chalk downland covered by ancient footpaths and bridleways. The road has few passing places plus steep turns but offers views right across to Thanet in the north, Canterbury to our west. On either side of the downs road there is arable farmland, growing wheat. Hares, kestrels, skylarks and buzzards are regular sights as you head in or out of the village. Tractors and combines often set the pace of travel on the road.

If you enter Adisham at the end where the flint covered Holy Innocent's church stands, you have to take a tight turn in round a small piece of village green. The church itself was built in Medieval times, but use of the site dates back further. The church was originally (A.D 616) part of the Manor of Adisham, land and buildings given by Eadbald, King of Kent, son of King Ethelbert, to the monks of Christ Church, Canterbury.

About half a mile from the church, is the other exit from the village. Woodlands Road, another single track road. From here we are connected by footpaths and bridleways with a centuries old landscape in the heart of Kents Area of Outstanding Natural Beauty.

Ileden and Oxenden Woods is a 200+ acre Site of Special Scientific Interest (SSSI). It is protected for nature conservation because of their variety of soil types and diverse habitats for birds and plants. There are also earthworks and burial mounds dating back to the bronze age.

Beyond the woods, walkers can join the North Downs Way with footpaths that once made up part of the Pilgrims' Way Pilgrimage route to Canterbury - part of the network walked by Chaucer's characters in his Canterbury Tales.

Then there are further networks of routes to take you round to Cooting Farm and return to the church.

This tranquil landscape as a whole, with its combination of farmland, woodland, grassland and chalk downland, is a thriving wildlife habitat. There is a rich bird community including turtle doves and ground flora, including two nationally rare orchids, narrow-lipped helleborine and lady orchid. I have personally seen: families of little owls which live in the farm buildings and spent time on the rooftops across from my house. Barn owls hunting on the edge of the woods on the edge of the downs, flying across the farmland near Cooting, and near Station Road. Skylarks, over the Adisham downs and over the farmland by Cooting Farm. Sparrowhawks. Bats, flying down the village street and over farmland. Badgers and hedgehogs. Hares in the fields. Red Kite over the fields near the woods. Storks. Buzzards. Too many more to mention, but that gives you an idea. This is an area where wildlife is encouraged and flourishes.

The village is a designated Dark Skies landscape too, and myself and local friends regularly spend time stargazing thanks to the clear views of thousands of tiny stars with the naked eye. The closer you walk to larger villages such as Aylesham, and the recently extended lorry part at nearby Highland Court Farm (Bridge) the harder it is to view them.



Many of my neighbours are farmers, with some having farmed the land here for generations. This is a close knit community where people support each other, and socialise together, and work together on things.

Building 3,200 houses around every edge of this space as the plan proposes will mean this 1,500 year old village, and surrounds, will be completely lost to history - along with the rural way of life which Kent is famous for.

## **Policy R20: Aylesham south**

### **What changes do you think should be made and why? Please provide any evidence you have to support your suggestions:**

'R20 should be removed entirely from the local plan.

### **Do you have any other comments on policy R20? If so, please write in below or alternatively you can upload a supporting document:**

An extension of Aylesham with an estate of 420 houses on prime farmland will have a negative impact on the community as a whole, destroy the historic village of Womenswold and is not viable for a range of reasons.

The 'Country Park' would not be beneficial: It is unclear from the Local Plan document as it stands, whether the proposed Country Park will be opened under the ownership of CCC as a condition of the contract, or whether this is an asset the developers involved would maintain control of.

There is a precedence in the local area of developers purchasing Country Parks/ undesignated nature reserves then applying for planning permission to develop the land for houses (eg Betteshanger Country Park, close by us in Deal).

There is obviously a big difference between a developer including a viable Country Park in their proposals for the benefit of the community, and the developer temporarily managing the land before later applying to build on it. The Local Plan doesn't make it clear what situation for the Country Park proposed under R20 would be. It is implied that there will be wildlife benefits, and opportunities for birdwatching etc, but the use of the term Country Park is far from promising and cannot be equated to a designated nature reserve where the land would be protected from future development.

Even if the intention is that this becomes a community asset, it is not clear from the information in the Local Plan what the added value to the community would be of this feature. The description is of a space which can be managed 'as farmland eg pasture, cut hay meadows'. The land they are suggesting they build this on is, as far as I know, already highly productive farmland. Once again it feels like the wording in the Local Plan speaks to some great ideals of food production, wildlife and sustainability, but without consideration for the existing community assets or the effect this would have on the existing ecosystems and land use.

For the same reason, the suggestion in the plan that the development would provide 'enhanced ecological connections' and 'opportunities for green corridors' seem spurious. Building on existing farmland will change the face of the local ecosystem, negatively impacting wildlife which is there.

The plan talks about 'small scale visitor facilities as well as new pedestrian and cycle routes including activity trails'. Again, this area has a range of walking and cycling routes. Many of which are currently frequently impassable and poorly maintained by KCC, who have to be chased to clear them so they're accessible for walkers, cyclists and horse riders. It would make more sense financially, and in terms of reducing the negative impact on the environment, to strengthen and enhance existing public access trails.

As with the site for R1, the plan for R20 mentions using 'garden city principles' yet there's nothing in this part of the plan that bears any true resemblance to a garden city, as outlined above. The tiny historic rural village of Womenswold and housing development in Aylesham do not have the infrastructure to support this number of new houses, even with if the provisions talked about in the plan made it into the eventual build.

The plan also talks about 'contributions to schools and healthcare'. Presumably these are contributions by the developers to the local council, though this is not made clear. Unfortunately, either way, this will be meaningless unless the underlying issues our community faces around these services are dealt with by policy makers and central government. There is also a precedent for certain developers operating in Kent, promising contributions to local services or community assets as part of a development and condition of planning approval, then not delivering on that, so it feels like these promises need to be taken in that context.

### **R21 Local service centre at Adisham**

#### **What changes do you think should be made and why? Please provide any evidence you have to support your suggestions:**

This should be removed from the local plan. The selection of this site is not appropriate, for the reasons already outlined regarding the unsuitability of Adisham for a new town/ housing estate. It is also unclear from the plans what this service centre would include specifically, and the community has not been consulted. It cannot be assumed that this would compliment existing local businesses or deliver on local need any more than the rest of the proposed plan.

### **Policy R22 Land west of Cooting Lane and south of Station Road.**

#### **What changes do you think should be made and why? Please provide any evidence you have to support your suggestions:**

This should be removed from the local plan. The selection of this site is not appropriate, given that it is prime farmland and an alternative site is located less than a mile away (where housing association homes currently offer an opportunity for more affordable housing) and has already been put forward by the local community.

**Thank you for your consideration of these comments. I hope you will find them constructive and clear and that they will give you a small insight into the strength of feeling in the area about what has been proposed.**