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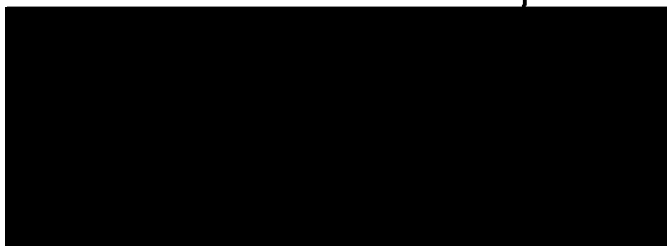
Secretariat to Draft Canterbury
Local Plan

Dear Madam/Sir,

I enclose The attachments to
The on-line submission of comments
made by me -

Please acknowledge receipt
of This letter -

Yours sincerely



Sir Geoffrey and Lady (Philippa) Nice

4th January 2023

Objections to Plan R1 of the Draft Canterbury District Local Plan

1. We have read the draft 'Adisham Community Response' which we fully support without reservation. For reasons of economy, we will not repeat *in detail* the arguments in that response.
2. However, we, as villagers without special knowledge of planning law, urge the Canterbury City Council to pay *particular* attention to the following passages of the response:
 - 'it is misleading for the sustainable travel aspect of policy R1 to be based upon the assumption that an essentially new rail station will be provided, big enough and modern enough to serve a new town.'
 - 'R1 will end Adisham's long history as a separate, independent, 'close, rural community (and R21 would do nothing for Adisham except urbanise it).'
 - 'The idea that Adisham's existence and identity can be maintained with an undeveloped strip between Adisham Village (200 houses and 350 inhabitants) and Adisham New Town (3,200 housing units) is laughable and cannot be taken seriously. Everyone who visits the site can see that R1 Adisham New Town will, in reality, swamp Adisham and join it to Aylesham PC (which neither community wants).'
 - 'Adisham is already a sustainable community, where people look out for each other and where there are small-scale endeavours (like Big Breakfast, the Litter Pick etc) which keep us going. The majority of us are here because we love our community. We have a much-loved village school and ancient Holy Innocents Church which has been sensitively updated to allow it to be a secular community space'
 - 'The mention of new parks and access to green spaces to justify R1 Adisham New Town caused grim amusement in the parish. Adisham is already incredibly well endowed with dramatic open spaces, tranquil ancient woodland and a well-signed network of PROWS (public rights of way)[and see below at xyz]. The plan can do nothing to enhance our already excellent access to 'green spaces'.
 - 'R1 will cause massive loss of a huge and prominent area of classic and historic open North Downs landscape.'
 - 'R1 would destroy much prime & superbly-productive land'
 - 'R1 Adisham New Town cannot be considered appropriate because it will result in significant loss of prime and versatile agricultural land at the very time that our country needs such land. In the past 12 years England has lost over 14,000 hectares of Grade 1 and 2 agricultural land to development, the equivalent to the productive loss of around 250,000 tonnes of vegetables (ref CPRE).'
 - 'One of the great things about living in Adisham is that, on a dark and clear night, you can see the Milky Way while walking down The Street. CPRE's '*Night Blight - Reclaiming Our Dark Skies*' maps show that, despite everything, we in Adisham live in a place generally of dark skies at night. R1 would spoil Adisham's dark skies at night, yet again eroding our quality of life.

All of Appendix B of the Response merits detailed and careful reading. Although prepared for the purposes of the Response the author of Appendix B (JAL) has been researching Adisham's woods from well before R1 was ever considered and the two components of Appendix B are effectively works of local scholarship on which the Canterbury City Council may wish to rely.

3. We wish to add points, some overlapping points made in the Adisham Community response but reflecting the way the non-expert villager may see things:
4. Policy R1 emerged without warning or consultation with Adisham villagers, local landowners, neighbouring villages or Dover Council.
5. 'Heritage assets' including:

'Cooting, Bloodden and Adisham Conservation Areas, Grade 2 Listed Cooting Farm House and Locally Listed Buildings Cooting Farm Cottages, Medgetts Cottage and Medgetts Barn'

are identified in R1 as suffering 'adverse effects' if R1 goes ahead. However, owners of these properties were not consulted before R1 was made public.
6. These basic elements of the history of the Plan and some of what it proposes suggest that the Plan was not properly prepared and the interests of those affected were *never* properly considered.
7. A FOI application is being submitted seeking details of when, by whom, why and how the R1 Policy was first developed.
8. Two garden villages are planned on Garden City Principles (GCP). The site - on fairly high, exposed, open high-quality agricultural ground - is not said to be in any way an ideal transport hub. There is no evidence-based explanation of why this location will prove attractive to businesses of any kind. It is merely hoped that the GCP principle of

'a wide range of local jobs in the Garden City within easy commuting distance of homes'

will be satisfied.
9. Road routes for work, retail or leisure purposes are: 9 miles by to Canterbury, 11 miles to Dover, 9 miles to Sandwich, 12 miles to Folkestone.
10. There is no adequate transport system covering and connecting the area of the proposed villages with local towns. The roads are inadequate for an additional 3,200 dwellings. The B2046 is already too narrow for the present lorries that use it (and that have to straddle the centre line imperilling oncoming cars and cyclists travelling in either direction). The Adisham Downs Road is only *just* two-way for motor cars; sensible drivers slow to stop, or near-stop, at various points when facing oncoming cars. Horses and their riders, and pedestrians, who are sometimes seen on both roads, are *always* at risk, a risk that will be substantially increased if R1 goes ahead.
11. The train service from Adisham railway station is slow. The track to London is nearly all two-line only (Newington the exception) and the service cannot

be made faster because of the intervening stops that must be made at significant villages and towns. To Canterbury East the train takes a nominal 9 minutes. Trains are usually one per hour. The train direct to London Victoria takes a minimum 1 hour 43 minutes. Crossing from Canterbury East to Canterbury West for the faster service to London St Pancras involves a 25 minutes' walk (there is no other way) and a second platform wait. The journey from Adisham to St Pancras takes, overall, as long as the journey from Adisham to Victoria.

12. Cycling to the major local towns for work or other purposes is wholly unrealistic for nearly all people - given distance and hills - and is dangerous. The B2046, as above, is far too dangerous; likewise the Adisham Downs Road and there is no cycle route beside the A2 towards Canterbury. Any councillor arguing that the proposed villages are accessible to Canterbury, Dover or Sandwich by bicycle is invited to try it out in the morning mist or evening gloom of an autumnal day in the rain, as if at the start or end of a working day.
13. Using Google maps suggestion for cycle times along the B2046, and assuming straight line cycle paths in the proposed garden villages, then energetic cycling to Adisham railway Station from the proposed new dwellings would take up to 10 minutes. Bearing in mind slope of land, likelihood of wind or rain, or occasionally snow, the real time for cycling to the station may be considerably longer.
14. Estimating conservatively, one (say 10 mile) car journey to and from one of the five nearby towns from each proposed dwelling each working day would generate roughly $3,200 \times 20 \times 5 = 320,000$ miles of car travel each working week. Is encouraging this, or anything like this, in any way ecologically responsible?
15. It is hard or impossible to see how what may be R1's 10,000 (estimated / guessed) inhabitants can possibly enjoy the Plan's overall objective:

to '.....enable most residents, [particularly those in the urban areas], to access their day to day needs within 15 minutes through healthy, environmentally friendly journeys.

10,000 (estimated) is a significant part of Canterbury Districts overall 160,000 (estimated see Plan page 6) population and the word 'most' in this part of the Plan will have to be changed to, or read as, 'some' only.

16. The site for R1 has *not* been chosen for transport or any other strategic evidence-based reasons (unlike, for example, Milton Keynes chosen because London needed houses for overspill). All that is said in the plan is that 'national policies have increased the level of housing growth the government expects in our district'. That expectation has now gone by change of government policy but, more important and even if still in place, the 'expectation' says nothing about the *nature* of the need to be served by

'housing growth'. Is it to meet a London borough overspill, as one housing development in Canterbury has done? If so, what account is taken of the difficulties that there may be with moving residents of a London suburb or similar to a greenfield site? If it is for residents in the Canterbury area, are their *particular* needs addressed and is there any reason to believe that they will want to live on a windy slope of land 10 miles out?

17. R1 clearly does nothing – and does not actually claim that it does anything specific - to

'...enhance our rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity and improving the health and well-being of our communities.'

in or around Adisham whose 'rich environment and valued landscapes', as they are at present, need no enhancing but would be damaged by R1, as might the 'health and well-being of [Adisham's] community' facing the problems and tensions of the proposed development, along with the long term consequences of living in a generally crowded environment served by unsuitable roads.

18. Noting the Plan's intentions to

preserve and enhance long distance views towards the surrounding countryside and Canterbury City and World Heritage Site with provision of viewing corridors from open space and PRowS crossing the site; and To conserve or enhance the PRow network across the site ensuring key views from the network are protected

It is clear that in reality the 10,000 inhabitants of the settlement described as 'garden community' or two 'garden villages' 'to be developed under developed garden city principles will loom or loom over the xyz odd residents of Adisham. Coalescence – partial or complete - *will* happen as the 10,000 will enjoy pleasing views towards Canterbury over the rooftops of Adisham while, however irrelevant to planners, Adisham villagers uphill view to the South and west will be of a looming village or town not open cultivated fields changing with the seasons and the crops planted.

19. Before turning to other matters of detail, a step back and general overview may help.
20. Councillors considering this complete change in the character of Adisham might feel they should spend five or so minutes reviewing its history at <https://www.british-history.ac.uk/survey-kent/vol9/pp180-185>
21. Similarly, for Aylesham, a new town built because coal had been found, that has a much shorter history.
<https://www.ayleshamgardenvillage.co.uk/index.php/ayleshams-history/>

Further:

29. It is hard to fit the R1 plan with the general statement of policy in Chapter 5:

The chapter includes site allocation policies at a number of the district's most sustainable rural settlements to support the vitality of these villages and provide some local affordable housing.

30. For all the reasons set out in the PC's objection there is nothing in R1 to sustain Adisham's vitality - which needs no sustenance beyond what it already has for the happy and successful community Adisham is. There is quite a lot in R1 that will draw and detract from that vitality once Adisham is literally, financially, educationally and in all other ways, overlooked and overborne by 'Adisham Newtown' / 'Adisham Garden City' / 'Adisham Garden Villages'.

31. We do not follow such logic as there may be for Adisham in the bolded words - when connected together - of the following extract from the plan. We recognise that more detail will be provided if the Plan is not dropped immediately but at first sight what is proposed as it affects Adisham simply does not fit with this part of the Plan

Areas of the district outside of the urban areas and the rural settlement boundaries are designated as countryside where development will generally be restricted. **Adisham, Barham, Broad Oak, Harbledown, Hoath, Lower Hardres, Petham, Rough Common, Stuppington, Westbere and Wickhambreaux are identified as local service centres. Within these settlement boundaries limited development which protects the rural character of these settlements will be supported on suitable sites and existing community facilities and services will be protected and enhanced to support the vitality of these important rural settlements. The provision of new community facilities and services, business space and tourism facilities outside of settlement boundaries will be supported provided such development is proportionate in scale to the relevant settlement and the need for them development outweighs any harm..... Within the countryside, which is defined as any parts of the district outside of the settlement boundaries of the urban areas, rural service centres and local service centres, priority will be given to protecting the rural character of the district. In this context, new housing development will only be supported in very limited circumstances....'**

32. We make no observations at this stage about the sufficiency of services other than roads. But there is much local comment by those with more knowledge than we have about insufficiency of water supply, drainage and sewage. We reserve our position to deal in detail with expert reports once prepared on these topics if the Plan goes further and is not now dropped immediately as it should be.

Sir Geoffrey and Lady (Philippa) Nice

4th January 2023

Objections to Plan R22 of the Draft Canterbury District Local Plan

GENERAL

1. We live at [REDACTED] and own the land to the northwest of the R22 site.
2. We have been approached - unsolicited - by an agent encouraging us to turn that land to financial profit by applying for planning permission to build houses on it. We have absolutely no interest in that happening and at the end of our lives will have done all we can to ensure the land remains without houses, or plans for houses to be built, on it.
3. We have planted many trees on our land over the last [REDACTED] years and most recently started to create an avenue of trees beside and to enhance the PRoW that crosses the southern part of the land; we regularly add hedging in various places. Without in any formal sense 'wilding' the land, it has been tended in such a way - for four decades with no fertilizers - as to encourage birds and wild animals as well as wild flowers.
4. Its setting against an agricultural field has allowed for a proper blending of neighbouring properties in an agricultural environment. That blending will be lost if R22 goes ahead.
5. We fail to understand how the site of a row of about 10 houses with cars parked somewhere to the front (or back?) And with back gardens can achieve what the bolded parts of this extract from R22 claims will be achieved by the Plan:

'Provide sustainable urban drainage measures;(b) Provide 20% biodiversity net gain, in line with Policy DS21;(c) Incorporate opportunities where possible for landscape and biodiversity enhancements identified within the Local Character Area I1:Adisham Arable Downland set out in Canterbury Landscape Character and Biodiversity Appraisal; (d) Provide habitat, pollinator and ecological connectivity across the site and with the surrounding landscape, including with the fragmented trees and hedgerows; And (e) Provide a substantial landscape buffer to the south of the site.
6. It is reasonable to assume that use of *individual* sites and gardens of owners of the proposed 'about 10' houses will match the use of effectively similar properties opposite, discernible without intrusion by viewing Google map or Google Earth. Nothing in that likely (entirely proper and uncontrollable) use cannot possibly justify the above claims in R22 about 'landscape diversity enhancement', or provision of 'habitat, pollinator and ecological connectivity'.

7. We note that although a landscape buffer is to be provided to the open field to the south of the site, no such buffer is planned for land to the northwest adjoining our land

8. We are also confused about

'Proportionate land and build contributions towards early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure'

9. Does this mean that houses once built will have to be at prices to allow the developer to make payments towards these services in some way to somebody? Why should that be so? Surely services are for residents of Canterbury, or Adisham, as a whole and newcomers living on R22, were it to go ahead, should not be burdened by an elevated purchase price of their houses with funding of services properly dealt with elsewhere.

TRAFFIC

10. An additional 'about 10 houses' at this site will increase risk at what is, to neighbours, already a dangerous stretch of road.

11. Traffic in both directions on the relevant part of Station Road is often at much in excess of the 30-mph limit. It is understood that the Council will not impose a 20-mph limit or introduce proper and effective traffic calming measures, such as by chicanes as in Littlebourne.

12. Additional houses, with their residents likely to be on, or suddenly to emerge from behind parked vehicles onto, Station Road will add significantly to risks of a serious or fatal accident in the road.

13. On water supply, drainage and sewage we will reserve our position until those with more expertise have commented and, if R22 is not dropped altogether from the Plan, until expert reports are available for us to consider.