

I am an Adisham resident (address supplied separately).

My comments are mostly related to biodiversity.

I am currently studying Ecology and Conservation at the University of Cambridge. I am also a member of Bat Conservation Trust, Kent Bat Group, Kent Wildlife Trust, the Wildfowl and Wetland Trust, the British Trust for Ornithology and the British Hedgehog Preservation Society.

I have responded to the previous regulation 18 consultations.

- **Deletion of policy C12 - Land north of the University of Kent**

I support and welcome the removal of this scheme from the previous Draft Plan on ecological grounds.

I would encourage the council to support the **Blean Biopark** proposal, and also **the separate proposal to reconnect ancient woodland in the area**, which would include expanding the Kent Downs National Landscape and a green bridge over the A2.

I would encourage the council to resist attempts by the University of Kent for major development in this area, given the opposition from Kent Wildlife Trust, the RSPB and others, including the local MP.

- **Policy N4 - Land south of Littlebourne Road**

I've not studied this policy in great detail, but I am closely following the South Canterbury development (CF1).

Given a bridge (over the railway line) is being proposed for connection to CF1, consideration should be given to ways of **creating north-south wildlife corridors** between the two sites.

I would be concerned about overall the increase in footfall on the public rights of way network (3d ii mentions creation of circular dog walks), and the need to provide funding to strengthen the maintenance of this.

Bekesbourne Lane is a narrow rural road (so limited capacity, passing places or footpaths) and it is hard to see how it could handle with development on both sides without significant changes.

Phasing with the **South Canterbury** development (CF1) needs careful consideration - e.g. an early part of that project is the **undergrounding of electricity pylons** which cross both sites (north to south) and the building of a substation either at the north or south end.

With regard to **potable water**, CF1's water is supplied by two companies, and the development corporation are yet to secure confirmation that water for 100% of the 4,000 homes will be met.

Similarly, delivery of the necessary **sewerage capacity** for CF1 is a major challenge; a development north of the railway line will only complicate this.

- **Policy N8 - Millers Field car park**

I'm commenting on this due to it's proximity to both the River Stour and Millers Field.

I wish to request **the addition of a clause covering suitable artificial lighting at night** (ALAN), in particular, recognition of the need to preserve a "dark corridor" for wildlife along the river itself.

ALAN has negative effects on multiple species, especially (but not limited to) bats - in part because all UK bats are insectivorous and it alters the location and behaviour of the insect population. It's not great for other things either, birds such as the robin, owls, glow worms...

It's important to note different species behave differently - pipistrelle bats, for example, tend to feed opportunistically around lighting, which might lead you into thinking, everything's fine, there are still bats here - however several species are *light averse* so will avoid streetlamps etc. by some margin, principally due to greater risk of predation. For example, the Daubenton's bat, which is best known for flying along the surface of rivers and lakes and which we, as Kent Bat Group, have observed regularly near the Westgate Towers as part of the *National Bat Monitoring Programme* waterway survey and also during guided walks for *Great Stour Riverfest*.

Similarly, any improvements to the riverside footpaths should especially avoid lighting that shines out horizontally, and of course you would also want to avoid lights shining into trees in Millers Field, which disturbs birds as well as bats.

Kent Stour Countryside Partnership is applying for a heritage lottery grant for their *Stour Valley Restore* project, which recognises the value of the city's river corridor to wildlife.

Also, I would hope that developer money from the project could go to biodiversity enhancements to Millers Field, which would also directly benefit the residents of the new houses.

- **Policy N31 - Chatham Paper Mill**

I'm commenting on this due to it's proximity to the River Stour.

I request **the addition of a clause covering suitable artificial lighting at night** (ALAN), in particular, recognition of the need to preserve a "dark corridor" for wildlife along the river itself.

I led a bat walk earlier in this area in summer 2025 - we observed pipistrelle bats (common and soprano) by the recreation ground and the paper mill (around the Station Road bridge) and Pipistrelle and Daubenton's slightly further west along the river (Riverside, near the railway crossing). I believe it highly probable all these species regularly use the section of the Stour in between (to the north of the main paper mill).

Chartham is an example of a village that still has dark corridors favourable to bats and other nocturnal wildlife and from an ecology perspective it's really important not to lose these.

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Kent Stour Countryside Partnership is applying for a heritage lottery grant for their *Stour Valley Restore* project, which will include the Chartham stretch of the river.

- **Policy C17 - Land at Canterbury Business Park** (aka Highland Court Farm)

This policy, of course, isn't in the latest *Focused Consultation*. However very recently, Chapel Down Wines announced their intention to no longer build a winery here (in reality, these plans did not include a vineyard, so would be better described as a factory and distribution warehouse).

The design of policy C17 was predicated on that development going ahead, and therefore I'd argue, that, at the very least, **the size should be revised downward to reflect this**.

The Draft Plan limited the development mix to viticulture and viticulture supporting activities (1(a) and (b)). My perception - albeit as a non-expert, but based on credible media coverage - is Chapel Down's projections of wine production/sales were overly optimistic - there doesn't seem

to be demand from any other British wine growers for production on a similar scale, especially with climate change making grape growing in the UK more challenging (c.f. regular crop damage due to wet weather).

If another warehouse-led development, in any sector, were proposed here, it would likely create similar issues of harm to the *Kent Downs National Landscape* as previously.

Overall, I'd like to see the council prioritising the value of the National Landscape over further large-scale commercial expansion in this area.

From an ecology perspective, I'm also wary of developments likely to force wildlife closer to a major roads (the A2 in this case) - either existing wildlife corridors are constrained leading to habitat fragment, or you put species at greater risk from collisions with vehicles (including in flight).

- Policy N34 - Barham Lay-by

Just to note that, given the intention is for up to 20 HGV spaces, there doesn't appear to be anything in the criteria covering **pollution** control, i.e. surface runoff, elevated levels of chemicals, tyre debris etc. and also **lighting** policy (i.e. the avoidance of unnecessary artificial lighting at night that would have a negative effect on wildlife), or screening to mitigate this.