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Sent: 11 May 2026 16:36
To: Consultations
Cc: Guy Steward; Joe Blackman; Tom Challinor; Jack Lowe; Clerk to Adisham Parish Council
Subject: 2040 Canterbury Local Plan, Regulation 19 consultation

--Email From External Account--

CARE (Conserve Adisham's Rural Environment) response to Reg 19 draft of the 2040 Canterbury Local Plan

1. **CARE supports this draft of the 2040 Canterbury Local Plan.**
2. **CARE supports the housing strategy as expressed in the plan**, in particular the emphasis on using the remaining 'brown field' sites and on building out from the existing built area and the decision to avoid parachuting new towns into beautiful open countryside with no existing infrastructure. We welcome the final scrapping of 'Cooting Farm Community Garden Scheme' (which, in addition to the loss of landscape, habitat, farmland, and our historic and separate rural community, was to be placed on top of an important aquifer) and 'Aylesham South', the huge Womenswold estate just inside CCC's boundary with Aylesham PC/Dover DC. CARE was pleased that CCC decided to lift to lift the subsequent threat to the Blean.
3. **Observation:** While we are alarmed at the huge numbers of housing units to be built over the plan period, we recognise that the target has been forced on Canterbury City Council (CCC) by national government which has produced these figures in a vacuum without statistical research into genuine housing need, whether district, county or national. Obviously, this has been the case with previous national administrations of different political stripes. We hope that all political parties will both develop housing policies based on meeting genuine housing need, rather than satisfying the market demand of the volume-housebuilders, and oversee a revolution in how local infrastructure is funded. On research into genuine housing need, the local authorities in Kent should now work together to build a picture of true need within the districts and Kent as a whole, publishing the results of such research and comparing it publicly with the housing figures handed down by Westminster/Whitehall.
4. **Affordable housing:** The need for small (hence cheaper) 2-bedroom houses & flats and 1-bedroom flats & maisonettes built for the private market is repeatedly expressed locally. While recognising that this is purely anecdotal and requires research, a broader housing ladder is clearly needed for those first-time buyers and others who want to avoid entering social housing. The whole 'affordable housing' concept is in danger of being discredited. CPRE has shown that there is often little difference in the cost of so-called 'affordable houses' compared to houses sold at the 'market rate' by the time that the volume housebuilders have offered inducements or lowered the price for buyers of the 'market rate' houses. Clearly, many of the housing units under the 2040 local plan will be built

under the auspices of East Kent Council, long after CCC has gone. However, there will undoubtedly be great disappointment in East Kent if most of the houses are overwhelmingly 'executive'.

5. East Kent Council future planning: No further major development schemes should be approved in what is now the south of Canterbury district until:

- (a) all the dwellings already approved, but not yet built, under the previous plan and in various approved ex-plan applications;
- (b) the housing units indicated in the 2040 plan have all been built; and
- (c) with the environmental & infrastructural impacts and costs have been fully **absorbed and measured** (including fresh water provision, waste water disposal and transport/traffic).

6. Policy R14 - NEUTRAL (a line of 10 houses along Adisham's Station Road). CARE remains neutral on this policy.

7. Policy R13 - NEUTRAL (Local Service Centres): In addition to the line of 10 above, the plan states that '*the neighbourhood plan housing requirement figure for Adisham is 19 dwellings*'. This apparent 'requirement' (averaging about one new house a year until 2043) is one that Adisham's NPG will work on.

8. Policy R21 - OPPOSE (Land at Canterbury Business Park). This proposal for further industrial sprawl in a prominent green field site is objectionable for several reasons:

- (a) It would undermine national objectives for landscape, damaging the nationally-designated Kent Downs National Landscape (Kent Downs NL) and the 'setting' of the Kent Downs NL;
- (b) This is productive farmland - the global reasons against the destruction of such land are obvious and world events continue to reinforce the imperative to conserve food-producing land;
- (c) The loss of important habitat - protecting biodiversity in the south-western block (noting that the White Helleborine occurs adjacent to the site and bridleway CB324 – listed as Vulnerable on Species Red List for Vascular Plants, and the Lady Orchid, also listed as Vulnerable on the Red List, and a Kent Priority Species, occurs within 500m of the site);
- (d) The site would be almost entirely dependent on private car use - this is contrary to the policies of national government;
- (e) traffic during both the construction phase and subsequent permanent operation - this will have detrimental effect on Woodlands Road, a quiet road used by pedestrians, cyclists (it is a designated Sustrans route) and horse-riders, not just cars. Furthermore, it will undoubtedly cause serious traffic problems in Adisham's The Street and the surrounding narrow country roads; and
- (f) Further light pollution from a site that already is a big example of how NOT to plan for light pollution.

Industrial fiasco: In the last 12 months or so, Chapeldown - which stated publicly at CCC's planning committee that it would make Canterbury '*... the wine-producing capital of England*' - pulled out of the site and the district. This developer blamed the abandonment of

its plans to build warehousing/factory (given the cute but misleading title of 'winery') on the planning process. This is clearly nonsense because it had won the planning process (a win about which it was triumphant); national media suggested the real reason for its withdrawal was that Chapeldown had overstretched itself with an over-ambitious view of the wine market.

9. Policy R22 - OPPOSE (Barham Layby/HGV 'Rest Area'). This confusingly-titled Heavy Goods Vehicle (HGV) site would actually be on Womenswold Parish's side of the A2 (i.e. Adisham's side), not Barham's. The main planning issue is light pollution; the danger can be seen with the lorry park at Highland Court. In view of how difficult it is proving to reduce significantly the egregious light pollution being emitted from Highland Court, we oppose R22. The Parish of Adisham is still, amazingly, in a dark skies area and our status as a dark skies area must be protected. CARE's attitude would change **if** CCC committed to enforcing best practice and best design on R22, to minimise light pollution from the R22 scheme.

10. Kent Downs National Park: CCC should get behind moves to ensure that the Kent Downs is a candidate for the next tranche of national parks, to join the family of England's 10 existing national parks. The outstanding landscape quality of the Kent Downs is proven, its geographical position and proximity to London and easy access from the rest of the south-east with the Kent Downs existing connections to the continent is excellent (including the proposed UNESCO Global Geopark status, supported by recent cross-channel sustainable tourism funding with French partners in the *Parc naturel régional des Caps et Marais d'Opale*) and the recreational opportunities qualify the Kent Downs to be a superb lowland national park. It would also be a huge boost to local businesses and prove transformative for the whole county.

CARE

11/05/2026