

CA//18/01948

Land at Highland Court Farm, Coldharbour Lane, Bekesbourne, CT4 5HN

Hybrid planning application for mixed use development for leisure, commercial and tourism uses comprising:

(1) A detailed planning application for a centre for sporting excellence (to include sports pitches, changing rooms, clubhouse and floodlights), business innovation centre, food and drinks hub and leisure hub; with access and associated highways works.

(2) An outline planning application (with all matters reserved) for business uses, food and drinks hub, innovation centre, home farm centre, artisan offices, mixed use court and holiday homes; plus associated access, landscaping, parking and drainage infrastructure

## CONTEXT

Bridge Parish Council resolved on 8 March 2018 (minute 127/17-18 9 (a) refers) to oppose this development, having convened an extraordinary Parish Council meeting on 15 February 2018 to hear the case for the development from Quinn Estates. Members of the public and parish councillors from Bridge and adjoining parishes were present. A large number of questions were raised at this meeting for the developer to address. Bridge Parish Council reconfirmed its objection to the proposals as published at its meeting on 11 October 2018.

### **Section One: The AONB and related planning issues.**

The entire area for the proposed development is situated within the North Kent Downs AONB. According to the Kent Downs website "AONB's are some of the UK's most outstanding and treasured landscapes. On a par with the UK's National Parks, each AONB is an outstanding landscape whose distinctive character and natural beauty is so precious that it is safeguarded in the national interest". The landscape within the scope of this development and the surrounding countryside and villages falls into this "**outstanding landscape**" category.

Bridge Parish Council concurs fully with the conclusions drawn from the November 2018 report by SCARP Landscape Architecture Ltd, a landscape architectural and environmental planning consultancy, who undertook a review of the landscape and visual issues relating to the development proposals.

They have written:

*The development of the proposed built form on a site of this sensitivity in landscape and visual terms is inappropriate, irrespective of the good practice that has been adopted in terms of provision of new areas of multi-functional greenspace, wildlife habitats and connectivity, sustainable drainage etc. The issue of integration of new built form into this nationally important AONB landscape remains a pivotal issue.*

*This is a commercial, residential, leisure and tourism led development set within a green, blue and grey grid. The proposals do not sensitively respond to the landscape and visual sensitivities of the*

*AONB and cannot be reasonably be described as 'landscape led' proposal on this basis. There is no evidence that decisions with regard to the location/distribution/quantum of built development on the site have been informed by the landscape character approach (e.g. the appropriateness of introducing housing (up to 9m high) into open areas of orchards with resultant truncation of existing panoramic views.*

*The developer's Landscape and Visual Impact Statement (LVIA) Para. 10.268 states that "In summary, the Proposed Development would result in some local adverse impacts on the character and visual appearance of the Kent Downs AONB but the effects of the development on character and visual appearance of the wider open countryside / AONB will not be significant or harmful." This statement is not justifiable.*

*The proposed development would adversely affect the landscape character (including historic character), natural beauty, special qualities of the Kent Downs AONB, which is so highly valued for its natural beauty and cultural importance. It would result in the loss of apple and nut orchards, which form part of the long-established tradition of mixed farming on the Kent Downs. It would impact on skylines and narrow country lanes. Tracks that date back to the 19<sup>th</sup> century would be incorporated into internal roads. The proposed built development areas would be located on elevated land and would occupy a high proportion of the original parkland, farmland and orchards associated with Highland Court and the model farm.*

*...provision of proposed sports and recreation facilities on this site is not consistent with the conservation of natural beauty.*

*LVIA Para. 10.288 states that "Apart views from sections of Public Bridleway within and immediately adjacent to the Site, the development would not result in any significant adverse effects upon the landscape or on visual amenity in the area surrounding the Site...." It is not just an issue of visual amenity - the LVIA should be giving full consideration to potential effects on the character and scenic quality of views. The proposed development would obstruct scenically attractive views across the open countryside that are so important for people using the AONB for quiet countryside recreation (e.g. from Public Bridleway No. CB 323, where existing open views across orchards and panoramic views across the wider landscape would be enclosed by new tree and shrub planting and new built development).*

## **THE NPPF and this proposed development**

Paragraph 172 of the NPPF (National Planning Policy Framework) specifically relates to development in AONBs.

It states: *“Great weight should be given to conserving and enhancing landscape and scenic beauty in ...Areas of Outstanding Natural Beauty, which have the highest status of protection...”*. It goes on: *“The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

Bridge Parish Council is in no doubt that this proposal constitutes a major development and does not meet the requirements of Paragraph 172. Speculative development should not be conflated with “the national or public interest”. This area of protected countryside is not included for development in the Canterbury District Local Plan (adopted July 2017). The impact of refusing this development will be minimal to the local community and will cause greater environmental harm than good. The sporting and employment elements of this application would be much better situated in a more sustainable location, closer to Canterbury, the hub of the local population. It cannot be argued that this proposed development comes close to meeting the requirements of the NPPF.

The 2015 Conservative Party manifesto stated that the party would protect the Green Belt and maintain national protections for Areas of Outstanding Natural Beauty together with National Parks and other environmental designations. This proposed development falls within a protected Area of Outstanding Natural Beauty. The Canterbury District Local Plan (LB1) replicates the NPPF and gives special protection to the Canterbury Area of High Landscape Value (AHLV). The proposed development falls in part on the Highland Court Conservation Area. It also abuts a Grade 2 Listed Building.

On the above grounds alone, Canterbury City Council MUST refuse this application.

## **Sporting facilities and the AONB**

We fully concur Richard Thomas of Richard Thomas Planning Consultancy Ltd regarding the sports element of this application. He writes:

*“The provision of a new Canterbury rugby club and Canterbury football club is seen by the applicants as a major attraction of the overall planning submission package. It is, however, the case that the applicants have offered major financial ‘inducements’ to attract both clubs to this site, and that such inducements can only be funded (and justified) by the speculative development included with the submitted proposals. The argument, therefore, is entirely circular; the huge residential and commercial development package has no justification in AONB terms, yet the provision of sports facilities is seen by the applicants as somehow justifying the overall package even though such provision can only be achieved through substantial subsidy generated by the unjustifiable yet significant residential and commercial development.*

*Armed with a similar level of subsidy, other non-AONB sites are likely to prove viable and so become available, as a result of which it would be apparent that, should such needs actually exist, there is scope for them to be provided outside the AONB designated area.”*

## **Section Two: Roads and Transport**

There has been a steady increase in traffic in recent years which is certainly impacting upon the local quality of life. This development will bring a step change in movement on local roads, most of which are little more than single track lanes. The village of Bridge, once deemed to be the most dangerous village in the UK prior to the opening of the bypass in 1976, is on the front line and will take the brunt of the traffic increase.

The developer suggests that the slip roads from the A2 trunk road will cater for most of the traffic using the proposed development. This is fantasy. The building of Mountfield Park, the closure of the Bridge Interchange and the creation of a new South Canterbury Interchange will drastically change the dynamics of travel in South Canterbury. Gridlock will be a permanent feature for those trying to access or exit Canterbury City Centre if we do not see a dramatic shift in personal transport modes. Unless living within easy reach of the A2, many people living across the Canterbury District will use country lanes and the small rural villages as rat-runs to circumnavigate the gridlock. This is, and will continue to be, the sad reality of travel around Canterbury.

There have been many serious and fatal accidents close to the slip road giving access to the proposed development. The short length of slip road leading to the Coldharbour Lane junction is obscured by a bend on the crest of the hill. Stationary traffic backing onto the A2 while waiting to access Coldharbour Lane and the proposed development will be at serious risk.

Bus services locally are expensive and poor value for money by comparison to other transport modes. Several services have been terminated or reduced by the operator. KCC point out the road layout and width of the roads are totally inadequate with a holding objection which relates specifically to this. Students may or may not be mini bussed in from main campuses, but most will use personal transport. KCC state: "The highway authority maintain that the site is not located in a sustainable location, ..as such is contrary to the adopted Canterbury Local Plan."

It has been suggested by the developer that residents will walk, cycle or take a bus (which one?) when using local services. How is this to be done? Quiet country lanes will no longer be a haven for cycling, walking and horse riding. Bridle paths will be severed by busy roads: traffic from across the district will be using quiet, narrow country lanes. On match days the weight of traffic will mean for most vulnerable road users i.e. walkers, cyclists and horse riders that the AONB will become a no-go zone!

Any growth of Canterbury Business Park without the creation of onsite parking and facilities for heavy goods vehicles will impact the surrounding area. The issues caused by the Gomez operation is a perfect case in point. Vehicles either waiting to load/unload/ out of tachograph time are already parking illegally. Companies are forcing drivers to park up, off site, while awaiting processing without taking any responsibility for the consequences. Debris, litter and human waste are left behind with clearance carried out by residents, other volunteers or at community expense by Canterbury City Council. During the public consultation, questions were asked of the developer about onsite HGV

parking. None would be provided, as HGV's would make this development look untidy and detract from this "exemplar" development. There is nothing exemplary about this planning application.

In short, the transport aspect of this scheme is flawed, unsustainable and will have serious consequences across the district, not just in the villages and the AONB.

## **Section Three: Housing, employment and light pollution**

### **Housing**

In July 2017, Bridge Parish Council commissioned a full housing survey from Action for Communities in Rural Kent. It identified a total need for 11 affordable homes with 5 for older households. In addition, it identified a requirement for 5 open market properties suitable for older households who want to downsize/move to more suitable housing for their needs. There was no reference whatsoever to holiday homes within the findings. The survey underpins Bridge Neighbourhood Plan which is likely to be the subject of a local referendum in the next three months. The Parish Council, through more than 5 years of consultations with the local community as the Plan progressed, has a much closer understanding of local needs and sentiments than any other group or developer and on NOT ON A SINGLE OCCASION has there been any mention of holiday homes or sports stadia.

### **Employment**

We welcome local employment but is Highland Court the right place? There are far better sites across the district, as identified in the Canterbury District Local Plan. The distance between Highland Court and the main population areas makes the site inaccessible and unsustainable. Large developments have been identified and incorporated into the adopted Canterbury District Local Plan and will meet the needs of the district for years to come. In addition, Kent University is home to the Canterbury Innovation Centre: we don't need another. Many other developments within the adopted Canterbury District Local Plan have a strong commercial and employment element and are situated in more viable locations.

### **Light pollution**

Policy F5 of Bridge's Neighbourhood Plan states that: *"The Neighbourhood Plan supports measures to reduce light pollution and promote the visibility and clarity of the night sky"*. We believe that this development, if allowed, will make this impossible with the proposed introduction of a wide range of new built development, including flood-lighting for the proposed sports facilities.

### **Conclusion**

Bridge Parish Council objects in the strongest terms to this planning application. The development falls within the Kent Area of Outstanding Natural Beauty, an Area of High Landscape Value and in part of the Highland Court Conservation Area. It will also impact on a Grade 2 Listed building Higham House-with many important historical links. This development is ill-conceived, unsustainable, will destroy wildlife habitats, will lead to the loss of high-grade agricultural land, increased traffic and pollution through the local villages and across the district and have a devastating impact on surrounding communities. It fails to meet identified local needs. It should be rejected entirely so that Canterbury can develop according to its own established and locally agreed development plan. The proposed development at Highland Court has no part to play and permission should be refused.

This statement represents the views of Bridge Parish Council. The contents are fully endorsed by other parish councils with whom we have been in consultation. Specifically, these include the following Parish Councils:

- Bekesbourne with Patrixbourne
- Adisham
- Bishopsbourne
- Womenswold
- Kingston
- Barham