



CPRE/11a

Town and Country Planning Act 1990

**Appeal by Kent International Gateway Limited
APPU2235/A/09/2006565/NWF**

Kent International Gateway, Land West of Junction 8, M20, Maidstone, Kent

**Statement on behalf of Protect Kent (the Kent Branch of CPRE)
by Dr Felicity Simpson, Chairman of the Maidstone Committee of Protect Kent**

LOCAL ISSUES (Summary)



The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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1. Landscape, Planning and Local Quality of Life

- 1.1 The most obvious impact will be on the site itself as the topography is transformed with huge excavations in some places and deep fill at others, because the terrain is undulating. The landscape will disappear under KIG to accommodate the railway sidings and built development.
- 1.2 The site is part of the Wealden Anticline on which differential erosion of the strata has produced the North Downs Escarpment. There is a continuum of the undulating landscape from the built development of Bearsted to the scarp slope of the Downs, and the presence of the linear M20 and HS1 does not adversely affect this sense of landscape continuum which, with the position of the countryside within the KIG site as the guardian of the foreground of the AONB, are reasons for the area having Special Landscape status within the Maidstone Borough-wide Local Plan 2000 saved Policy ENV34. Local landscape designations are important to those who have participated in local democratic discussions and decisions about them.
- 1.3 The Inquiry has established the importance of the landscape character of the North Downs AONB and the requirement to protect that landscape. The SE Plan includes Policy C3 on AONBs *“planning decisions should have regard to their setting. Proposals for development should be considered in that context”* to offer protection to the land around AONBs otherwise why specifically mention the setting.
- 1.4 The KIG land is green rural countryside. One of the attractions of Maidstone is the close proximity of the countryside and residential areas recognised in Maidstone Plan saved Policy ENV28. This KIG project would replace that countryside with large, high buildings, gantries and poles for lighting, much noise and the constant movement of vehicles. Retained woodland and planted areas would not be countryside but part of a built logistics depot. For security and safety the green areas would have to be brightly lit so would not pass a tranquillity test.
- 1.5 PPS1 *“Delivering Sustainable Development”* reinforces the sense of place with the statement *“Planning shapes the places where people live and work and the country we live in,”* and warns *“poor planning can result in a legacy for current and future generations of the loss of our finest countryside to development”*. That fear stalks the local communities living under the threat of KIG. PPS1 also states *“sustainable development is the core principle underpinning planning. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations.”* KIG will result in the obliteration of the countryside and its historic context, greatly reducing the quality of life of local communities.
- 1.6 PPS7 *“Sustainable Development in Rural Areas”* has *“(i) To raise the quality of life and the environment in rural areas through the promotion of: thriving inclusive and sustainable rural communities ensuring that people have decent places to live by improving the quality and sustainability of local environments”* and proposed development should *“respect and where possible enhance local distinctiveness and the intrinsic qualities of the countryside”* supported by *“continued protection of the open countryside for the benefit of all, with the*

highest level of protection for our most valued landscapes and environmental resources.”

- 1.7 This Inquiry has shown how valued is the countryside of the KIG site by local people and their elected representatives expressing opposition to the KIG project, which fails the test of benefit to the people.

2. Food Security.

- 2.1 Much of the countryside of the KIG site is under agriculture, arable and grassland for livestock rearing. Food security is an issue that is of more significance in the UK now than it was in early 2007. The agricultural land (i.e. not the woodland) on the KIG site is Grade 1 and 2 and 3a, all valuable for their food production.

3. Separation of Built Development

- 3.1 There is the saved Maidstone Plan Strategic Gap Policy ENV31 and even in the South East Plan Policy AOSR7 Maidstone Hub “*vii. Avoid coalescence between Maidstone and the Medway Towns conurbation.*” The proposed additional planting in the Strategic Gap is small and would be part of a logistics depot not of the open countryside.

4. Microclimate

- 4.1 A feature of the KIG site, especially the southern end of Water Lane and the surrounding low lying land is its microclimate. That area is a “fog hollow”. The fog drifts upwards toward the M20, especially as the air warms slightly after sunrise. KIG would produce much more standing water and an increased concentration of particulates, ideal conditions for smog, very hazardous to human health and dangerous to motorists if it drifts across the M20. Presumably KIG has undertaken a risk assessment of the possible smog likely to result from the bringing together of standing water and particulates on the KIG site and of that smog reaching the M20.

5. Geology

- 5.1 The geology and the undulating topography create severe problems for delivering an SRFI here. A huge amount of material must be moved as cut and fill, much in the Gault Clay which underlies about half of the site including a large part of the area allocated to railway sidings. Gault Clay is a very difficult medium for any construction, as it has a high plasticity which makes it very unstable and liable to heave. The KIG site Gault Clay is very unpredictable and there must be continuous detailed analysis at every movement of the material to determine the method necessary to stabilize the exposed Gault as well as the fill Gault, as identified in Environmental Statement section 9.4 (Ground Conditions) produced for the 2007 KIG application.
- 5.2 KIG so far has merely stated that any difficulties can be overcome by engineering, without giving details. Engineering may have answers but at what cost? Details of the problems to be overcome in construction have been given by Mr. John Wale of Protect Kent. This mention is to endorse that evidence which includes on site cut,

fill and construction issues and the very important question of the safety of the major transport routes adjacent to the KIG site. So:

- Start-up costs may be for the developer, but if they skew eventual charges for using the facility invalidating assumptions about relative costs of moving goods through KIG they become a planning matter.
- Carbon Emissions are a cost to the community and the total carbon audit necessary to deliver the project, especially lorry emissions and the amount of concrete likely to be required, is a planning matter if the proposal to transfer freight from road to rail is to reduce carbon emissions. Concrete requires much cement and the making of cement is a large emitter of carbon in part because of the amount of electricity required, which could come just as the UK is experiencing brownout in 2012.
- Water supply is affected by geology. Mr Warren of Protect Kent has pointed out the threats to the Folkestone Sands aquifer. They are of great concern to the people of Maidstone, for whom, given Kent's low rainfall, clean water from this major aquifer is very important.

6. Heritage.

6.1 History makes a place special, and gives a sense of identity to the people living within or near that place. Modern farming on the KIG site has a long tradition; there are other historical features. That history would be obliterated by KIG.

7. Health

7.1 Health, of individuals and of communities, is now embodied in the SE Plan (p15) with the heading "A Healthier South East" whereby a healthier region means working to improve "*the physical and mental health of its citizens, their well-being and productivity*". Adverse health effects from KIG are:

- despondency and stress among local people;
- loss of opportunities to improve fitness by walking in the countryside of the KIG site;
- damage to respiratory health because more lorries in the local lanes increase the level of pollutant emissions;
- fear of crime and of criminals attracted to the site and the surrounding area. The SE Plan (p16) has a core objective "xii. *Crime and the fear of crime will be reduced*";
- disturbance to work, leisure and sleep by frequent yet intermittent noise emanating from the site during the construction phase as well as when operational.

8. Conclusion

8.1 The countryside of the KIG site is precious; it forms the foreground to the AONB; produces foodstuffs, contributes to the health of local people as a place of exercise and recreation, gives a sense of identity to the area and the people. This rural green area of Maidstone must be protected from the ravages of the horrendous KIG proposal and this planning application appeal should be dismissed.

Note. These comments are made with reference to the planning application and do not mean that Protect Kent Maidstone accepts that all the indicative proposals would actually be delivered. So many unknowns, so much speculation, but the destruction of the countryside would be real, and Maidstone people would suffer.