

Eutrophication

...it's as unpleasant as it sounds

Au revoir to a champion

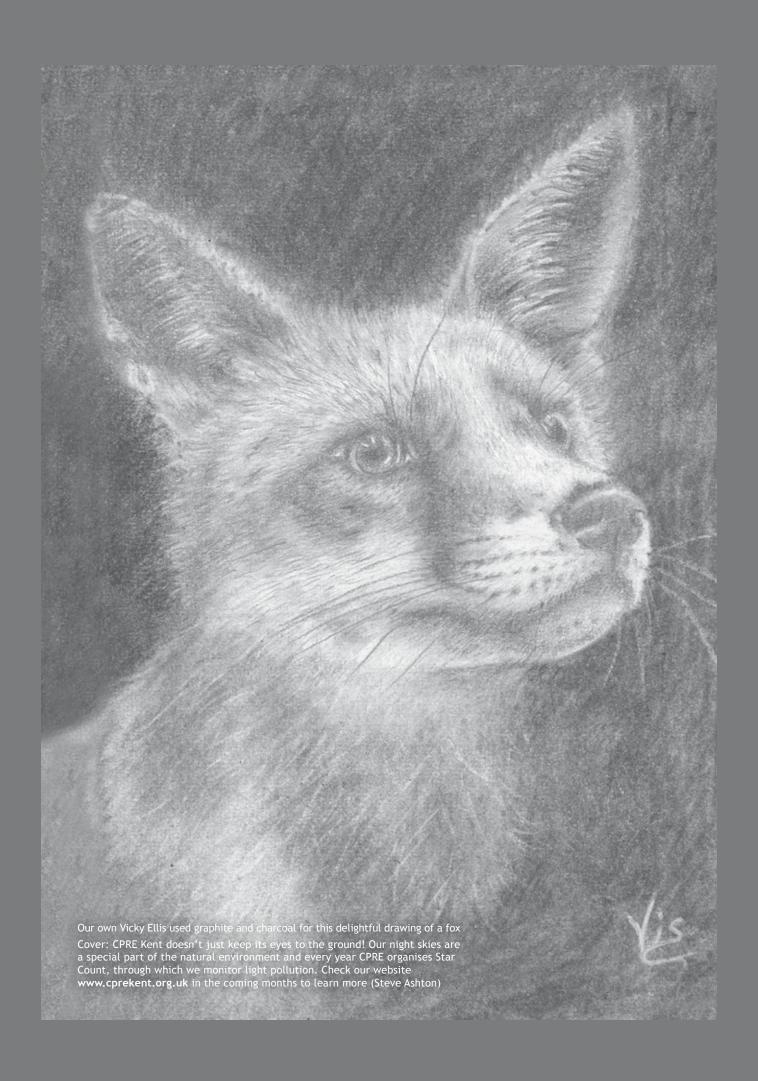
Our former chairman opens a new chapter



Back to nature

How landscapes are being restored for wildlife

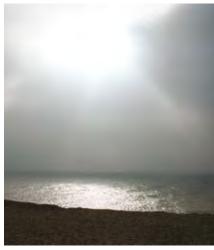




## CONTENTS

Autumn - Winter 2022/23







**4-7**THE BIG SOCIETY

CHAIRMAN'S UPDATE

24-25 LOCAL PLANS OVERVIEW

8
DIRECTOR'S REPORT

16-17
PICTURE THIS!

**26-29** AROUND THE DISTRICTS

9-11 EUTROPHICATION

18-20 MOVING ON

30 EVENTS

12-13
HABITATS UNDER THE HAMMER?

**21** FROM THE FRONTLINE

31
SHOP AND LOTTERY RESULTS

14
HIGH OR LOW (INTENSITY)?

22-23
PAST GLORIES

## contact us

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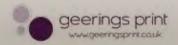


We always love to hear from our members, so please feel free to drop us a line and tell us what's happening in your part of the county. We are especially eager to hear from anyone who would like to volunteer as a district committee member. If you want to help us keep Kent beautiful, then get in touch with us at info@cprekent.org.uk or call 01233 714540.

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This female Eleonora's falcon drew thousands to Lydden Valley, the charms of which were showcased to many for the first time (Steve Ashton)



"This is one of the big conservation stories." Alan Johnson, RSPB area manager for Kent and Essex, is perched on a bench at Northward Hill nature reserve looking over Halstow Marshes talking about the work his organisation is carrying out in the Thames estuary to restore swathes of an area under siege from development but somehow still fabulously rich in wildlife.

"We have created a network of hotspots on a landscape scale for breeding waders on the North Kent Marshes - building on the work of the Elmley Conservation Trust, which knocked the ball out of the park."

The RSPB (Royal Society for the Protection of Birds) has taken on an impressive suite of sites in north Kent and been restoring them to their wetgrassland glory.

Shorne Marshes, Higham Marshes, Cliffe Marshes, Northward Hill, Great Bells Farm (Sheppey), Seasalter Levels... the society has been busy in this part of the world, while, county loyalties aside, it would be remiss not to mention reserves such as Rainham Marshes and Bowers Marsh over the Thames in Essex.

The RSPB has had a presence in north Kent for many years, but what has sparked the intensity of focus?

"The 2008 financial crash kind of got that going. We took the view that we were spread too thinly and should instead prioritise certain landscapes, reducing the number of areas we're involved with," says Johnson.

"The Greater Thames Estuary hosts the largest assemblage of waterfowl in the UK, while there are also breeding seabirds and waders. It is possibly the most important ecological landscape in the country, so it was one of the obvious places."

Of course, there was recognition that the RSPB couldn't do everything itself - if there was to be genuine landscapescale conservation, a whole range of other landowners and managers needed to be involved.

"We're working with farmers on the North Kent Marshes, gearing up to do a load of stuff. We're helping with grants and with advice on conservation management, while organisations such as the PLA [Port of London Authority] are also interested in what we're doing."

The perhaps obvious question is what is driving farmers to jump on the nature conservation rollercoaster - financial incentive or the love of wild spaces and the nature within them. "It's a bit of both," says Johnson. "Some are doing wetland restoration work with no financial reward at all."

To some extent underpinning everything is government policy and Johnson points to ELM (Environmental Land Management) as particularly important.

This three-tier scheme aims to switch from

farm support based on direct payments towards a policy based on 'public money for public goods'. With the phasing out of the Basic Payment Scheme and the government believing that direct payments were a poor use of public money, under ELM farmers and other land managers will now be paid largely for delivering environmental benefits rather than according to the amount of land they farm. The ambition for the North Kent Marshes

is great but not without significant financial cost. So the Green Recovery Challenge Fund award in 2020 of almost £1,900,000 to the RSPB, Kent Wildlife Trust and Canterbury City Council was, it is fair to say, welcome.

The money was to be targeted at the Seasalter Levels, Wraik Hill Local Nature Reserve near Whitstable and Blean Woods RSPB reserve... because we are fortunate both that the North Kent Marshes is far from the county's only natural treasure and that conservation bodies are heavily invested in them.

In addition to a chunk assigned as a National Nature Reserve, both the RSPB and KWT have substantial holdings in the Blean, that expansive if broken swathe of woodland lying primarily north of Canterbury. It contributes the largest population of nightingales on any RSPB reserve, there is a strong population of the declining lesser spotted woodpecker and the nationally rare heath fritillary butterfly has its stronghold here.



All reason to be cheerful, but as ever things are never going to be quite so simple. Every spring, the Sarre Penn, which runs through the Blean, reduces to barely a trickle, while overall too much water is lost to the woods. Or, in other words, the Blean has been drying out.

It was while blocking streams in the woods with sticks "with my youngest, William" that the lightbulb moment sparked for Johnson.

"There are many man-made drainage channels in the woods, but they don't have stops or sluices - so we've been putting in leaky log dams or earth dams to help keep some of that water. We're also changing the old, canalised streams so they can get their old meanders back and work better for wildlife," he says. "It's a lot of work, but many woodland bird species have been lost.

"Although the Blean has so many positives, it also has a lot of boring single-age woodland with poor structure. We're opening this woodland out while tackling issues of water, age and structure. There's an emerging strategy to make the woods of the Blean more connected."

Whether talking wood or wetland, an unavoidable theme is that of water - or more specifically the lack of it. At the time of writing, Kent is one of several parts of the country to have just been declared a drought area by the National Drought Group, citing our driest summer in 50 years.

Few now dispute that climate change is responsible to some degree at least for what is becoming an increasingly stressful situation and the RSPB is preparing for probable repeat events. Hot, dry weather makes the Thames estuary vulnerable to the drying-out of pools and the resultant loss of invertebrates at just the time the wader chicks so dependent on them are fledging. Parallel to this is coastal squeeze - "the loss of natural habitats or deterioration of their quality arising from anthropogenic structures or actions" as defined in a government report. Clearly, doing nothing is not an option.

"We have to consider saline options where sites can't be maintained as freshwater, but there is still the need to protect viable freshwater options. The Thames marshes, for example, are reliant on rainwater input."

Water, predictably, is a primary concern at another relatively recent RSPB acquisition in Kent - Lydden Valley, near Sandwich, which drew some 3,000 birdwatchers in May this year to see just the 11th Eleonora's falcon recorded in this country.

For many who had travelled from across the UK, it was their first acquaintance with a site known more widely among locals as Worth Marshes. Seeing the rarity was the one and only priority in a venture sometimes bordering on the obsessive (although most also hoped to connect with another scarce visitor in the shape of a red-footed falcon), but it has been evident that the reserve - which entailed the purchase of three farms and their subsequent reversion to largely wetland habitat - made a big impact on the travelling hordes.

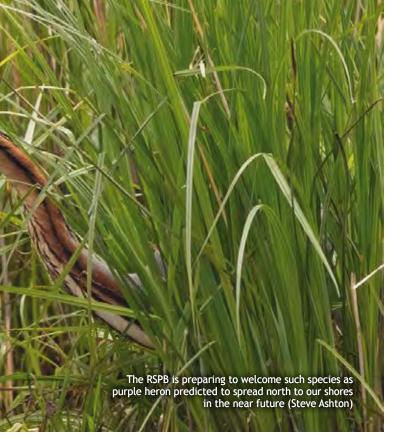
However, they have seen nothing yet: "The really dramatic stuff is yet to happen," says Johnson. "The water that's there is only about 5 per cent of what will ultimately be a much more extensive wetland. By next breeding season, we'll be 70 per cent there in terms of water - it will be another five years till we hit 100 per cent.

"The site has a complicated hydrology and we need a larger volume of water to run it as a reserve than we are currently licenced to abstract.

"Abstraction issues should be sorted out soon, but water is low. We need rainfall - there's a wider scenario where we might be running out of water in May and June, although solar pumps at that time could be a game-changer."

Meteorological predictions indicate that England will be receiving more rain in the winter and less in summer (the latter at least seems nailed on!) and the challenge is how we store the rain that does fall to cover for those times of potential drought.

On a personal level, Johnson has made a start at Northward Hill.





"I built that," he says gleefully, beckoning towards the 'wobbly' water-storage feature... it even has islands!

Back in east Kent, Lydden Valley is an example of how complex the process of establishing a nature reserve can be, especially one where landscape changes are the driving force.

If the water issues weren't taxing enough, there was the matter of taking ownership of the three farms as they came into the society's hands sequentially rather than in one block. Restoration grants came soon after the site had been bought in its entirety.

And at Seasalter, another reserve with genuinely exciting potential, a complicated and landmark legal case via the Access to the Countryside Act 1949 was necessary to secure the land through compulsory purchase... and now comes Kent's biggest habitat-restoration project of the lot.

As at Lydden Valley, public access is an issue. "The seaward side of Seasalter Levels is the most heavily disturbed part of the Greater Thames SPA - we need to think carefully about that as we have to put wildlife first. Sometimes there needs to be a buffer that not everyone visiting a reserve will be happy with," says Johnson.

It's arguable that nature has never been in a greater state of flux than it is now. Rampant levels of urban and industrial development continue to impact massively, while, arguably allied with that, climate change is affecting bird distribution at an almost dizzying rate.

Cattle, little and great egrets are now well established in England, while little bitterns, purple herons and black-winged stilts are among the primarily southern species to have bred here in recent years. (The pair of purple herons that raised two young at Kent's own Dungeness RSPB reserve in 2010 were the first ever to nest successfully in this country.)

While we will probably lose some species, the RSPB is preparing to welcome those likely to be joining us in the near future - indeed, it was one of the principal factors in pursuing the Lydden Valley project.

"We're working on our reserves to accommodate the arrivals," says Johnson. "It's likely to be all the more important as birds struggle with the drying out of Spain's Coto Doñana and the change of management policy at Oostvaardersplassen [the Dutch site so long portrayed as the exemplar of rewilding in Europe]."

Switches in direction are always going to be as evident in nature conservation as in anything else, as Johnson points out.

"There was a lapwing-factory mode here when I moved to Kent. It was a very RSPB thing to do - get obsessed about species delivery results - but while we're still a species-focused organisation we've realised you can't achieve for those species without working on a landscape scale."

Today's approach sits neatly with the Lawton principles, derived from the 2010 governmental review that "looked at our wildlife sites and whether they are capable of responding and adapting to the growing challenges of climate change" and highlighted the need for more, bigger, connected wildlife sites.

The clutch of reserves on the North Kent Marshes goes a long way towards that concept, but perhaps as important is the increasingly healthy relationship between the RSPB and other landowners and operators in the area, where "there's big support for what we do".

And in another encouraging development, Johnson points to greater cooperation among conservation groups: "We work hand in glove these days with other NGOs [non-governmental organisations] - there used to be a disconnect."

That has been evident recently with the RSPB, CPRE Kent, Save Swanscombe Peninsula and Kent Wildlife Trust putting on a unified front during the battle to spare a nationally important wildlife site in north Kent from the ravages of a theme park.

In a time when good news can seem a little thin on the ground, the work being done by the RSPB and others is cause for cheer. "The hard yards in conservation is the way the land is managed," says Johnson. Let's raise a glass to those who are putting them in. ■



Hilary Newport

## Director's Report

All at CPRE Kent were deeply saddened to learn of the death of Her Majesty Queen Elizabeth II. We were honoured to have her as our patron throughout her long reign. As our patron, she showed her love for the countryside over many years, helping CPRE celebrate its 80th birthday and providing valued support throughout.

Since she became our patron 70 years ago, the Queen took a keen interest in our work, most memorably hosting CPRE anniversary events at Windsor Great Park in 2001 and St James's Palace in 1976 and 2006. CPRE Kent is hugely grateful for the commitment Her Majesty gave us, which will be long remembered and honoured by our organisation at every level.

As our new Prime Minister takes up the reins of her new role, she faces an unenviable series of challenges. The war in Ukraine continues, the escalating price of fuel is driving an extreme cost-of-living crisis, the NHS is at breaking point and the thorny matter of the Northern Ireland protocol remains to be resolved before Brexit can be settled. We have heard that her first priorities will be the economy, energy and the NHS and there is no doubt that these are deserving of attention.

Nevertheless, the twin crises of climate and ecological decline also need urgent attention. Britain has just sweltered through the hottest summer on meteorological record and, in the current uncertainty over exactly how and when our planning system might evolve under yet another new housing minister, it's perhaps time to set down the policy 'wish list' that we at CPRE Kent would hope the new government could implement to address the policy deficit in climate and ecology.

**Energy:** the cheapest and greenest energy will always be the energy we don't use. The planning system should be enabled to require buildings to be constructed to rigorous standards of energy efficiency. Changing weather patterns mean we increasingly need to cool our homes and commercial buildings as well as heat them, and planning permission should be conditional on the highest levels of fuel efficiency.

Planning reform must ensure that productive agricultural land need not be sacrificed in the interests of a 'quick fix' for producing renewable energy: renewable energy must be incorporated into the built environment. Meanwhile any 'knee-jerk' decision to reverse the manifesto policy of a moratorium on fracking in the UK will be a devastating blow to local and global environments and do nothing to resolve the short-term crisis in energy prices.

Elsewhere on the political agenda, action must be taken to support the retrofit of insulation, renewables and energy efficiency in the existing housing stock to save millions of people from energy poverty.

Water: the sorry record of pollution incidents from untreated wastewater entering our seas and rivers is causing predictable public outrage. While the power to control pollution incidents lies outside the planning system, water supply and treatment companies must be treated as statutory consultees in the setting of housing targets in Local Plans to help balance water supply and the infrastructure needed to manage wastewater safely with housing targets. The stalling of planning applications due to Natural England's concerns over nutrient pollution in protected areas is being cited as a target for policy intervention to remove so-called 'red tape', but the natural environment, already threatened from so many different angles, must not be sacrificed in the interest of profit (see articles elsewhere in this issue).

Countryside and the climate crisis: there are so many ways in which a new planning system could address the pressing need to reduce our emission of carbon dioxide and other greenhouse gases. A coherent land-use strategy is essential if we are to halt the loss of valuable agricultural land. Our food security is at risk for the first time in a generation. We must focus development on brownfield land so the countryside can be steered toward a multifunctional approach to management that reconciles food production with environmental benefits and climate mitigation.

**Transport:** all new development should demonstrate how it will deliver measurable reductions in private-car mileage and be welcoming to pedestrians and cyclists, not dominated by parking. It must be located where facilities are easily accessible without a car

As the new Prime Minister and a new cabinet settle into office, no doubt there will be many lobbying groups pressing for policies that will benefit their interests. But CPRE is the only organisation that speaks out to protect the countryside and the environment for its own sake: with the help of our members and supporters we will always be there to be the voice of the countryside.



London was once a matrix of towns and villages with beautiful and picturesque meandering rivers fed by freshwater springs and tributaries. It's hard to visualise now but, as the city sprawled, the rivers that once teemed with life were used as dumping grounds during the 1800s. They became desperately polluted - like open sewers or disease pits - and had an overpowering stench.

Eventually, about 12 of these rivers were entombed and incorporated into the sewer network of London, never to flow above ground again, with only the odd stink pipe here and there left to tell of their demise.

You would think this sad legacy of pollution and destruction of our natural waterways would be behind us and that we would have learnt from our filthy past - but it would seem not.

We have all heard the word 'eutrophication' used lately, but what does it mean and why are the associated nitrogen and phosphate so damaging for our waterbodies?

According to Myriam Webster, "the definition of eutrophication is the process by which a body of water becomes enriched in dissolved nutrients (such as phosphates) that stimulate the growth of aquatic plant life usually resulting in the depletion of dissolved oxygen".

To date, an estimated potential development of 120,000 new homes and 74 local authorities (LAs) with protected sites (Special Protection Areas, Special Areas of Conservation and Ramsar sites), including some in Kent, have been affected by human-induced eutrophication pollution.

These LAs were told by Natural England (NE) that any proposed change of land use or development in 'catchment' areas around these protected sites with waterways must not proceed without a Habitats Regulations Assessment (HRA) to determine any potential adverse effects on protected sites.

However, to enable the moratorium on building to be lifted, where developments are likely to fail the HRA requirements, the developers will be requested to take mitigation action by either including additional mitigation plans on-site, working with the LAs to place mitigation off-site (wherever that might be), or buying nutrient credits via a trading scheme, *ie* where other landowners within the catchment area have taken action to reduce their nutrient load.

How this will be policed, *ie* how these landowners who have reduced their nutrient load will be monitored for continuous reduction, is not clear.

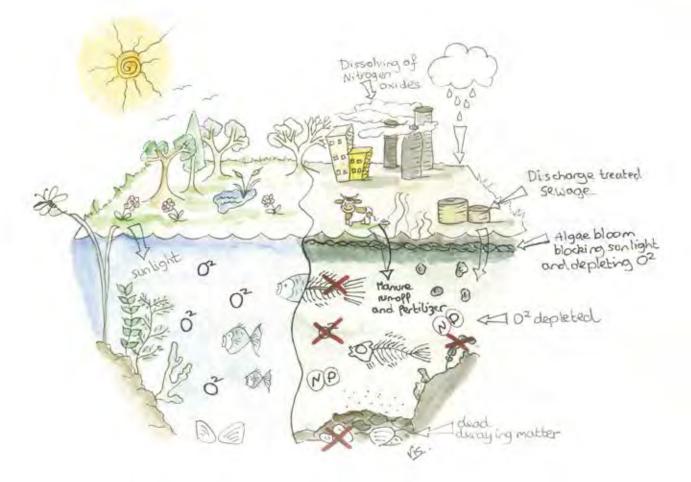
In this article we examine why both nitrogen and phosphate cause so much harm and damage to aquatic ecosystems, to the economy and to public health. To understand why eutrophication is so damaging, one needs to understand the vital role they play in plant health.

#### Understanding the role nitrogen and phosphate play in plant health

Nitrogen (N) is a macronutrient (part of the chlorophyll molecule giving plants their green colour). It is essential for plant function and a vital component of amino acids - the building blocks of plant protoplasm, a translucent substance integral to the structural fabric of the plant and that is essentially the living matter within the cells. Protoplasm plays a role in flower differentiation, growth, health and quality of fruit.

These macronutrients enable plants to utilise sunlight via photosynthesis and thus aid plant growth.

Phosphorus (P) is important in cell division and the production of new tissue, along with complex energy transformations within the plant, aiding the conversion of other nutrients to usable building blocks enabling growth. Phosphorus is a component of DNA containing genetic data for all living organisms. It is also part of the RNA reading the DNA's genetic coding, responsible for the synthesis of ▶



proteins that form the structure of aquatic plants. DNA and RNA are linked by phosphorus.

Adenosine triphosphate (ATP) is the source of energy for use at cellular level. ATP's structure is a nucleoside triphosphate, made up of three serially bonded phosphate groups, a ribose sugar and a nitrogenous base called adenine.

P is contained in many minerals within our soils and N makes up 80 per cent of gases present in our atmosphere, but they do not exist in a form that can be readily utilised by plants or animals.

Both N and P are crucial to all living things being able to power their cells. It all goes wrong when human activity interferes with this delicate balance and then N and P just become pollutants leaching into waterbodies both above ground and below (aquifers), or via effluent being released directly into the rivers and seas. Even rainwater now contains pollutants.

Once pollution has occurred, N and P feed the algae in the water, which causes it to bloom and proliferate abundantly, choking the water and robbing the aquatic life below of sunlight, leading to aquatic dead zones, slowing the river flow and in some cases releasing toxins into the water.

Eventually the algal bloom will die back and sink to the bottom, where microbes get to work breaking down this organic matter. The dead and rotting algae feed the microbes and they begin to proliferate, using up the available dissolved oxygen required for respiration by animals and plants.

Once the oxygen levels reach hypoxic or anoxic levels, other aquatic biota in the water begin to suffocate and die and, in turn, also feed into the dead and decomposing organic matter, accelerating oxygen depletion yet further. At this stage the water has reached the point where it can no longer cleanse itself. Once the human-induced pollution has reached this level, the knock-on effect is a complete imbalance of the aquatic ecosystem. The delicate food web has effectively broken down and the food organisms that have died are not available for fish, birds and mammals to feed on, leading to a localised population

crash and an ecological imbalance.

The high rate of photosynthesis that occurs with eutrophication can also be detrimental due to the depletion of dissolved inorganic carbon, raising pH levels to such a high during the day that they effectively inhibit chemical cues that some organisms rely on for their survival by impairing their chemosensory abilities

Algae are as much a part of the ecosystem of waterbodies as any other aquatic organism, but we only notice them when the natural balance of nature is disrupted and they bloom out of control.

In certain extreme cases, anaerobic conditions lead to the proliferation of bacteria that produce toxins that are fatal to aquatic life and other higher organisms.

One such infamous group of algae are cyanobacteria, photosynthetic prokaryotes (so not true algae but bacteria) more commonly referred to as blue-green algae. Cyanobacteria can produce the toxin microcystin and anatoxin-a, which is what makes us and our pets ill if ingested and is a danger to livestock and wildlife

Blue-green algae produce beta-methylamino-I-alanine (BMAA), an amino acid compound that may have causal links to neuron diseases similar in nature to Alzheimer's in humans with prolonged exposure.

These microscopic organisms are naturally present in lakes and streams and can either be unicellular, filamentous or colony-forming species appearing as scum on the surface but can also be present at depths of two to nine metres, therefore not necessarily visible from the surface.

Due to their ability to utilise low levels of nitrogen and phosphorous, they can out-compete other algae, despite generally growing more slowly. Blue-green algae tend to bloom on sunny, still or stagnant, warm water that is nutrient-rich. Not all blue-green algae form toxins, but it is very difficult to tell without testing the water which species are involved. Algae of the

genus *Anabaena* are generally the ones involved in poisonings, but they are not the only toxic blue-green algae.

Poisoning by cyanobacteria has been documented globally as a threat as far back as 1878. However, the phenomenon of bluegreen algal blooms has become more frequent over time; this is due to both increased eutrophication pollution and also climate change, the two key factors cyanobacteria love - nutrients and heat, the optimal temperature being 15°C-30°C, with an optimal pH of 6-9.

Harmful algal blooms (HABs) not only pose a threat to public health but also to drinking-water systems, aquaculture, commercial fishing and fisheries, recreational fishing and, ironically, livestock farming.

Eutrophication for the nitrogen load generally entails diffused sources primarily from agricultural land.

Other sources of nitrogen include gases such as ammonium from spreading manure, nitrogen oxides from ships - transmitted via the atmosphere to oceans via precipitation - aquaculture, wastewater-treatment plants, industrial water and contaminated oceans. Phosphate generally comes from domestic and industrial sewage, wastewater and run-off and leaching from land treated with fertilisers, including muck-spreading.

The effects of human-induced eutrophication can be profound, not only from an ecological stance but also an economic

perspective. Even if we only consider the ecological impacts, the devastation and fundamental change in the ecological balance and the inability of the waterbodies to cleanse themselves are likely to have an acute effect on our future health.

Not only are we at risk of losing some of our most valued and precious protected open spaces, we are also at real risk of losing our own health and well-being as a direct result if we carry on ignoring the damage we are inflicting on the natural world.

This is why NE has issued new nutrient-neutrality rules. Housing Today's campaign A Fair Deal for Housing addresses the concerns of developers caught up in NE nutrient-neutrality rules and the hundreds of thousands of pounds they are losing.

However, this pollution problem is much bigger, even in terms of economics - what is really needed is a fair deal for all of us and for nature. It is simply not sustainable to keep pumping more and more sewage, treated or untreated, into our seas, rivers and streams from more and more new developments without some kind of effective mitigation in place.

We have a responsibility and duty of care to the environment that, in turn, protects and provides for us.

The threat of eutrophication affects us all, not just directly but indirectly, too, because it is not simply about a few aquatic organisms dying on a protected site somewhere - if our delicate ecological system collapses, we collapse along with it.







Over the preceding pages we addressed the problem of eutrophication.
Here CPRE Kent planner **Richard Thompson** focuses on how the issue is impacting more broadly on planning.



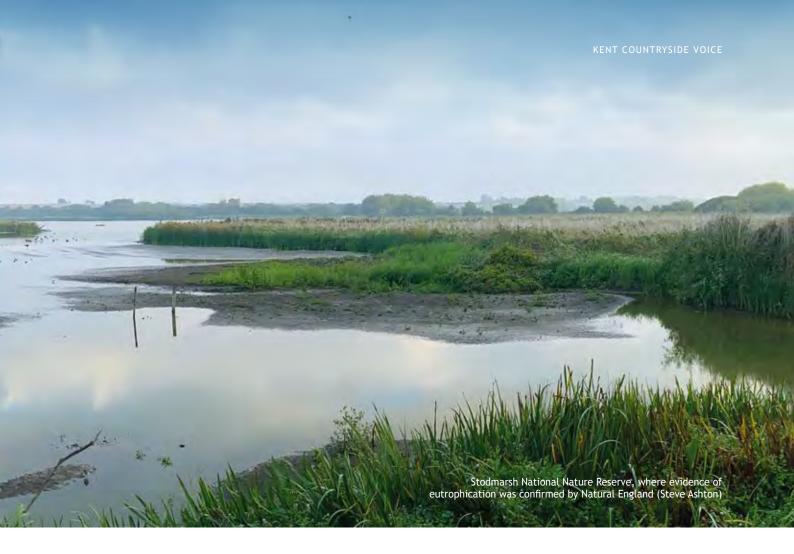
Nutrient pollution and eutrophication is a major environmental issue for many of England's waterways, to the extent that in some parts of the country it has brought about a pause in housebuilding.

This has its origins in the UK signing the 1992 Habitats Directive as a member state of the EU. This committed us and all other member states to protecting hundreds of species and more than 200 habitat types across the EU. Importantly, this established an EU-wide network of protected areas, collectively known as Natura 2000 sites and set out the rules as to how they would be protected.

These rules were transposed into domestic English law, currently the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). After the UK left the EU, the regulations were amended so that previously protected Natura 2000 sites in the UK would at least start with the equivalent protection to what they had under EU law. These sites in the UK are now generally termed European Sites.

Within the Habitats Regulations is a requirement that all plans and projects must be assessed as to whether they are likely to have any impact on the European Sites. If there is any risk of an impact, a detailed assessment needs to be undertaken - this is called an Appropriate Assessment. It applies what is known as the precautionary principle, meaning it must conclude there is no reasonable scientific doubt as to an adverse impact on the protected site for that plan or project to be allowed.

In June 2019, Natural England notified several local councils in east Kent that there was evidence of eutrophication within the Stodmarsh water environment, a European Site and National Nature Reserve east of Canterbury. It also advised that an adverse impact from any new housing development within the Stour catchment area feeding into Stodmarsh could not be ruled out. This was because new housing development meant more sewage being put into wastewater treatment plants, which in turn equals more nitrogen and phosphorus being pumped out into the water system.



The only way new housing development could be allowed would be if a proposed development could demonstrate, beyond reasonable scientific doubt, that no additional nutrients would be added to the water system, ie that the development would be nutrient neutral. The consequence of this advice has been an effective moratorium on all housebuilding within the Stour catchment area.

While a pause on all housebuilding might sound like a good thing for a charity concerned with protecting the countryside from inappropriate development, it is having the opposite effect and, in some cases, leading to further inappropriate development.

This was demonstrated at a recent planning appeal for 145 houses on an unallocated greenfield site near Tenterden. Here the developer was able to successfully argue Ashford's five-year supply of housing was much lower than being reported by the council on the basis no new housing sites within the Stour catchment area should be counted towards the supply given the Stodmarsh nutrient-neutrality issue.

This tipped the planning balance firmly in favour of allowing the scheme. While, commendably, Ashford Borough Council took an expensive legal challenge against this decision, regrettably it was unsuccessful.

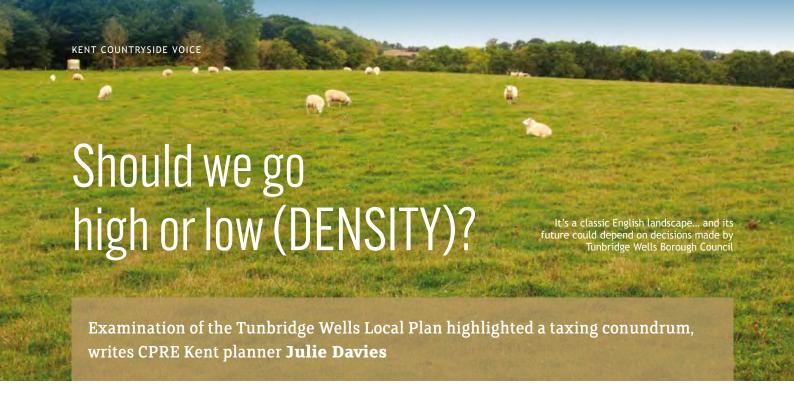
With speculative applications on unallocated greenfield sites outside the catchment area being allowed ahead and instead of allocated sustainable brownfield sites within it because of this issue, we agree that a solution is needed.

Certainly, it is the case that stakeholders affected by this issue have been working towards a mitigation-based solution and we now have the emergence of a national government-backed creditbased mitigation scheme. There, however, remains uncertainty. In the meantime, we are seeing concerning rhetoric directed towards the means of environmental protection rather than the actual problem of eutrophication.

Certainly, Prime Minster Liz Truss made her position clear: "Our current system of planning is too bureaucratic, too slow and too complex. We would reform the planning system and cut red tape that prevents local communities from building the houses they want. We would remove Brussels red tape, such as nutrient neutrality, that has stalled housing projects without delivering on what it is designed to address."

The government is now putting this into action, with the Retained EU Law (Revocation and Reform) Bill paving the way for all EU-derived environmental law to be removed from UK law by the end of 2023. Combined with a proposal within the Levelling Up and Regeneration Bill to replace existing EU-generated systems of environmental assessment with a "clearer and simpler" process of 'Environmental Outcome Reports', there is now a very real risk that existing environmental protections are to be watered down.

This direction of travel is wrong. There must be no regression of protection afforded by the current environmental assessment regime. We are already trying to fix environmental problems through mitigation rather than avoiding them in the first place. Such mitigation is just a sticking plaster. While the eutrophication problem will never be resolved through the planning system alone, that system should be playing its part in only allowing truly sustainable development with all environmental constraints robustly accounted for from the outset. ■



No one wants to see green fields being lost to housing development. But we understand that housing need has to be met.

If the field near you is being allocated for housing development in your Local Plan, would you:

- a) prefer to see it built out at low density which would need more fields to be allocated, or
- b) like to see higher-density development, meaning fewer fields were lost?

This is an issue that was tackled head-on by our volunteers at Tunbridge Wells, supported by our planning team at Charing. And the case made some headway at the examination hearing sessions into the Tunbridge Wells Borough Council Local Plan.

Did you know councils aren't obliged to meet housing need in full? Need is calculated in accordance with a government-set standard methodology.

The National Planning Policy Framework states that Local Plans should provide for objectively assessed need for housing, unless policies within the framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development.

This means that within the Green Belt and Areas of Outstanding Natural Beauty councils can reduce their housing requirement.

One of the CPRE arguments put forward at the Tunbridge Wells Local Plan examination hearing sessions was that if densities were increased on new residential allocations, less land would need to be allocated.

We know the government attached great importance to the Green Belt and AONBs. By definition, this means there should be flexibility in the level of housing numbers for which councils must seek to allocate land.

As you will know, CPRE is not an anti-housing group. It lobbies to ensure that the right homes are built in the right places. For this reason, CPRE argued at Tunbridge Wells that

densities on allocated land be increased, so sites yielded more new homes, taking the pressure of development off other greenfield sites.

This argument aligned with the NPPF, which states that Local Plans should contain policies to optimise the use of land - and that this will be tested robustly at the examination phase of Local Plan-making - and should include minimum density standards for city and town centres. The NPPF goes on to say that these standards should seek a significant uplift in the average density of residential development in these areas.

Higher densities don't only relate to locations well served by public transport - but also to other parts of the Local Plan area.

Is it right then that, if the proposed new garden settlement at Tudeley goes ahead, it should be built out at the very low density of 30 dwellings per hectare? If irreplaceable tracts of countryside are to be lost to housing development, wouldn't it be better that density be increased, rather than other parcels of land be lost to help meet housing need?

If you're of the view that the openness of the Green Belt and the attractiveness of the AONB is such that densities should be kept low, then surely the council's stated housing requirement (target) should be reduced to acknowledge this point, as set out in paragraph 11(b)(ii) footnote 7 of the NPPF?

Higher densities bring more homes but also the benefits of supporting a range of day-to-day services and amenities that otherwise may not be viable, or only be accessible by car, which is not helpful in terms of pursuing sustainability goals in the context of climate change.

So, of the three options, which would you prefer?

- 1 a reduced housing requirement to reflect the specialness of the Green Belt and/or AONB
- 2 new homes built at low density
- 3 increased densities as a way of reducing land-take and potentially giving greater support to local amenities and facilities

It's a difficult one, isn't it!



The chairs of our district and specialist committees meet every quarter and it is hardly surprising that, with the wealth of campaigning experience represented around the table, these meetings often feature the most thought-provoking and fundamental of our discussions.

Our September meeting was no exception as we found ourselves debating the vital question of how we express our response to the housing crisis. Are we, as a colleague challenged us, effectively telling those without adequate housing that they may not have it in the Kent countryside?

None of us believe that we are such narrow-minded, self-interested nimbys, but we must justify our approach to development in terms of the wider public interest. I attempted to explain my own approach to this subject, which involves going back to fundamentals. There are no simple answers, there are myriad trade-offs and those I mention are just a few of them.

I believe that we want a planning system in England that serves the long-term interests of our society, not the short-term interests of developers or the equally short-term preoccupations of politicians seeking re-election.

This involves meeting the needs of our current and future citizens in a sustainable manner. It involves building energy-efficient homes in sustainable locations and improving the energy efficiency of our existing housing stock. It requires that homes are built with the needs of the local community in mind, both those who will live in the new homes and those who already live nearby. It involves designing housing developments to combine access to communal green space with efficient use of scarce land in our crowded island.

## Chairman's Update

#### John Wotton

We want a planning system that serves the long-term interests of our society, not the short-term interests of developers

We must accept that generating more zero-emission energy will result in some wind and solar power installations in the countryside but no more than are absolutely necessary and in places where the environmental harm is least.

We must promote access to the countryside for everyone. We must encourage local food production. We must ensure that our national parks, AONBs and Green Belt are protected for the environmental benefits they bring and for the enjoyment of all of us.

Finally, we must nurture the cultural capital we hold in our unique historic buildings and design housing to enhance the setting in which it is built, whether urban or rural. We are not nimbys and we are working on a vision for better and sustainable planning decisions in Kent, which we hope to publish soon.

It is the function of the planning system to direct development towards these long-term, sustainable needs, ensuring that all the direct public-sector costs of development are recovered and all the wider environmental costs of development are taken into account. This inevitably makes some market-driven developments more expensive.

By the same token, it is the function of national and local government to provide the structures and finance necessary to provide affordable housing to meet the needs of our urban and rural populations with the minimum adverse environmental impact.

The answer to people living in homes that don't meet their needs, or renting when they would prefer to own, isn't to give private-sector developers free rein to build market housing on every greenfield site they can acquire. It is to provide them with the incentives to build the homes that are needed in the places that are truly

sustainable. This is what current and future generations need if our society is to be sustainable in the long term.

The past 12 months have gone by very quickly and we are already looking forward to our annual general meeting on November 4 (details elsewhere in this issue). Do please make every effort to come in person, if you possibly can, as it is the one occasion in the year when we all meet. If you're unable to attend, please complete the proxy form so that you and your vote count at the meeting.

In addition to the normal business at this AGM, we are proposing to make some important changes to our constitution, to include clear provision for virtual meetings in case future pandemics or other crises should again force us to meet only online. We also wish to reduce the quorum for general meetings as the number of our active members is continuing slowly to decline. On this subject, do please consider becoming more involved in our committees and other work – we need your help!

My own term as chairman of the branch must end at the AGM in 2023 and we are now actively looking for a successor to take over from me in just over a year's time. If you might have the time and energy to take on this role, or if you know someone who might be suitable, do please let our director Hilary Newport know.

In June, I attended CPRE's national AGM, at which it was resolved to form a new Network Assembly, on which all the branches, as well as national CPRE, will be represented. CPRE Kent will, of course, participate fully in this new body, which was due to have its first meeting in September. At the time of writing, CPRE is seeking a new national chief executive, following Crispin Truman's recent resignation.

I look forward to seeing as many of you as possible at the branch AGM and at our Christmas lunch on December 2.



# Picture this!

Living Land is a day out at the Detling Showground for children aged eight and nine, provided free by the Kent County Agricultural Society.

In May, more than 2,600 children came from schools across Kent. The aim was to teach them something about Farming, Food and the Countryside.

There was a lot to see and do - sheep-shearing, farm-machinery demonstrations, animals (provided by Young Farmers' Clubs) to stroke, food to taste and displays varying from wattle hurdle-making to lifeboats.

Sue O'Neill joined Andrew and Anne Rillie for a day engaging with children in a bid to spark an early interest in the countryside











In 2020 we three long-term members of Kent CPRE decided we could make a useful contribution but, because of Covid, Living Land was cancelled.

In 2022, although we now have an average age of more than 80, we set up an interactive stand, with the children handling and identifying objects and pictures.

It was good that just about all the children recognised drink cans, food wrappers and bags of dog poo (no, it was not real!) and knew these should not be left around in the countryside. Sadly, though, almost no one knew a thrush and very few

identified an ash twig.

When time allowed, the children were invited to draw pictures of something in the countryside - contributions varied from flowers, trees and rabbits to a water mill and a caravan and you can see some of them here.

It was a big effort, but we did enjoy the day and felt that many children had learnt something from us and perhaps we had sparked some interest in the countryside.

• You can see more pictures from Living Land at www.cprekent.org.uk - search 'Living Land'





RKJ... the very letters! They point to the phenomenon that is Richard Knox-Johnston, former chairman and general all-round fixture at CPRE Kent for just about as long as any of us can remember.

All things, though, must end and so it is that RKJ has departed for pastures new. Hampshire, to be precise, and, as with many things in life, one's loss is another's gain, although, asked if he intends to offer CPRE Hampshire the benefit of his considerable experience, the snapped retort is "I need a chance to settle in!".

CPRE first came to RKJ's attention in 1974 during the battle against a development local to him in Bromley. "CPRE was very helpful," he says and so a long and intense relationship was born.

That grey-green borderland zone where Kent abuts London helped formulate much of the RKJ approach to life, while it was there that he served as a Conservative councillor for the Borough of Bromley's Darwin ward, which includes within its boundaries Cudham, Downe and Pratt's Bottom. It is, he points out keenly, the London borough's only single-councillor ward.

The political ambitions culminated in an unsuccessful bid to represent Chatham and Aylesford as MP in 1997, the year of the Tony Blair landslide. "It wasn't a great election to choose," he says with a smile. "But at least I know what it's like to be rejected by 21,500 people."

Recognising the potential clash of interests with his activities at CPRE Kent, an avowedly nonpolitical organisation, RKJ resigned from the Conservative Party when taking the county chair although has since rejoined.

You also can't talk about RKJ without reference to his 10-year stint in the British Army, culminating in his rank of captain with the Royal Signals. The cap clearly fitted as RKJ brought his leadership and man-management skills as a skipper to the cricket field, where, you suspect, he was in his element more than anywhere.

Having given up the game at a remarkable 77 years of age ("I twisted a knee and decided it was time"), he plotted his future path "always with a view to watching cricket in retirement".

As often as possible, that is at Lord's, which is where I meet him for a day to reflect on his time with CPRE Kent.

Between cheeky tales of winding up the cricketing opposition and observations on the country's political state of flux, he both recalls our charity's successes - he was chair until 2013 - and offers suggestions as to the way forward.

"The role of CPRE is to delay something long enough so that it's no longer viable," he says, relating how the approach helped scupper plans for an environmentally damaging cement works at Holborough, much of which lay in the Green Belt.

He highlights other Kent successes such as the quashing of an application for a vast commercial development close to Leeds Castle ("we were the only people to present heritage evidence and the applicant didn't know their heritage law"); the High Court defeat of a housing scheme at Pond Farm, Newington, which represented the first instance of air quality proving critical in such a judgment; and the landmark victory over unacceptable plans for Farthingloe in the Kent Downs AONB ("it just didn't make sense - I was surprised the council took it to that extreme").

There's plenty about which our organisation should be proud, without question, but these days RKJ focuses more on his role as chair of the London Green Belt Council.

The concept of the Green Belt is of course dear to CPRE, although I can't but wonder if it might at times prove detrimental to Kent, which has relatively little land designated as such in comparison, for example, with neighbouring Surrey, almost all of which lies within the Green Belt.

"A lot of 'old' Kent lies in the Green Belt - there's approximately 25 square miles of it in Bromley - so it depends how you look at it," responds RKJ. "I do, though, think Kent was slow to get on the Green Belt bandwagon.

"More broadly, as we say in the recent LGBC report Safe Under Us?, since the early 1940s the population of London has grown at about the same rate as that of Los Angeles. If London had to been allowed to expand at the same rate, it would now extend from Brighton to Cambridge - the Green Belt stopped that."

As his involvement with CPRE Kent

fades, RKJ can look back on times that were at times taxing but never dull - so what conclusions has he drawn?

"It has been a privilege to work with [director] Hilary and the team," he says. "CPRE Kent has the opportunity to defend things that other branches can't - it's an effective branch that achieves things and as a result we've claimed one or two scalps along the way.

"I've been working with the team for some 20 years and the amount of work that goes into preparing for an inquiry, for example, is enormous. CPRE Kent is very lucky to have people of such quality.

"Another positive element is the development of our relationship with a tremendous network of parish councils, primarily through KALC [Kent Association of Local Councils]."

As for RKJ, his new world sounds idyllic. He's close to (but not a member of!) one of the most exclusive fly-fishing clubs in the world, Test cricket is played not so very far away at Southampton and the 20-minute drive to Winchester station as he set out for our day at Lord's entailed not a single car in front of him ("how many places are there where you can say that?")... but nevertheless was it a wrench leaving Kent?

"Yes, we arrived in Beckenham when I was four and I lived in the county up until our recent switch, but I don't linger on things - I move on to the next chapter."

And does he leave the county in a better place than he found it?

"Kent has big problems with infrastructure, notably water and sewage. The water companies said they could cope with the sewage from all the development going on, but they palpably can't. The thing is, they will tell you that the government tells them they have to say that."

Never one to restrict his talents to a limited arena, RKJ is also chair of CPRE's County Branches Forum, but the recent formation of the Network Assembly is likely to induce a change in that body's role.

"Ideally, the new assembly will take on the role of the County Branches Forum, but it may take time to do that," he says. "When it's fully established, I would like to see it adopt some task-and-finish projects. There's devolution, water and sewage and of course membership - I don't think we've been tremendously successful in that area. It's also time for another couple of sessions on climate change."

Declining membership is, sadly, an issue faced by many organisations in many fields, so how should CPRE Kent reverse the trend?

"During the Covid pandemic, Sussex Wildlife Trust are reported to have more than doubled their membership, so it can be done. We need vision and strategy - the principles are the same for anyone:

- a) Who are we looking for?
- b) Where are we going to find them?
- c) What are we going to offer them?

"When I was giving talks for CPRE Kent, I would ask at the end 'Did you find that interesting?'. Of course, no one was going to say no, so I'd say 'Then please join!'."

Like tears in the rain, such RKJ moments are gone for us, but is it really goodbye?

"I'm still a Kent vice-president - I offered to go as I don't want to tread on any toes, but I'm still here and happy to help if anyone needs me. I have a great connection with CPRE Kent but don't want to overstep the mark.

"I've still got quite a lot of friends in and around the organisation, some of whose arms I twisted so tightly that they joined or became volunteers. I have been privileged to work with some excellent, dedicated and gifted volunteers

who have contributed greatly to our cause."

These are testing times for those who love the Kent countryside, to the point that some who have given so much towards its protection are close to throwing their hands in the air and giving up. What would RKJ say to them?

"I do understand it can be very depressing on occasions, but you have to fight. You never know which ones you're going to win.

"It's like a cricket match. You don't know at the outset if you will win, but providing your team is well qualified, the pitch is even, the weather good and you have credible, unbiased and knowledgeable umpires, you can win in spite of the odds.



"When we do win, we should ensure all are aware of our success as it encourages others. CPRE on the whole are not good at publicising our successes."

If CPRE Kent did fashion... RKJ sports our cream-coloured fleece jacket that doubtless seemed a good idea at the time



#### Annual General Meeting James Seymour of Natural England and James Smith from Loddington Farm are the guest speakers at this year's Annual General Meeting of CPRE Kent. It is being held on Friday, November 4, at the usual venue of Lenham Community Centre, starting at 10.30am and ending after lunch, which will be served at 12.30. Please let us know if you would like to appoint a proxy if you are unable to vote, or if you would like to join us for lunch (the charge for lunch is £12 per person, cheques payable to CPRE Kent, to be received no later than Friday, October 28). The agenda is included as an insert in this magazine and is also on our website.

# From the Frontline

Hilary Newport with the campaigns update



The frontlines might seem quiet at the moment as we are waiting for a new Development Consent Order for the Lower Thames Crossing and a potential new application for the London Resort. The reality is, of course, very different as the unsung but essential work of engaging with Local Plans continues relentlessly.

Few people understand the importance of taking part in Local Plan development. Local Plans are key to shaping how land will be used and places will change in the future.

Planning applications need to be in line with Local Plans if they are to gain permission and helping shape a Local Plan is the main opportunity to influence what will happen in your area. Once an allocation is made in a Local Plan, it is very difficult

to stop it from being approved - the important decisions over planning were probably made years before a planning application is submitted.

With 12 districts across Kent, as well as the unitary authority of Medway, the constant review and examination of these Plans is relentless, and more vital than ever.

If we don't have our say on the sustainable allocations of land in each district, you can be sure that the landowners and major developers who are looking to maximise their profits will have their say, and they must not go unchallenged.

Often CPRE is the sole voice speaking up for the countryside when such decisions are made - it's more vital then ever that we continue to be able to do that.



#### Let June Bloom got off to a positive start this year, writes Vicky Ellis.

The campaign, launched by CPRE Kent, asked people to give wildlife the best possible chance by not cutting back the flowers on which so much of it depends.

It follows on from Plantlife's No Mow May, so fantastic for helping protect spring flora but worthy of being taken a little further.

With our insect population in freefall, Let June Bloom can help give our insects a chance to thrive and in turn help our larger fauna.

Many wildflowers and insects come alive during June. Plants such as cowslip, evening primrose and wild foxglove all bloom in

this month, while insects that hatch in June include large white, small white and small blue butterflies.

June also sees the hatching of caterpillars such as copper underwing, garden tiger and gypsy moth, along with insect larvae including sawflies and beetles. Bees including red-tailed bumblebee and wool carder bee are all very active during this special month.

Allowing June to bloom means wildflowers can carry on providing pollen for many insect species, allowing eggs of moths, butterflies and beetles to hatch and feed and so help our insect population thrive.

• If you would like to take part in next year's Let June Bloom, please contact the office for more information.

In the last edition of Kent
Countryside Voice, **CPRE Kent's Ashford** committee looked at
the issue of 'doing archaeology
better' and making greater use
of technological advancements
in searches related to planning
applications. In this second article
we address the wider role of
archaeology in the planning system.

Any number of elements feeds into our wider planning system, but one that is perhaps rarely considered is archaeology, so it is instructive to examine the role it can play in the decision-making process.

Kent County Council has a substantial heritage team covering our prehistoric and historical environment; within it is a county archaeologist who oversees two main teams:

The **records team** have a heritage manager or Historic Environment Record (HER) manager. The HER is a large database containing the county's known heritage assets; the most pertinent source of archaeological information when planning applications are scrutinised, it is constantly updated.

# Past glories... and how they shine on what we do today

It includes buried and visible archaeology (from early prehistoric artefacts to prehistoric, Roman and early Medieval settlements, burials and industrial remains to 20th-century Cold War bunkers and hospitals) along with standing buildings and associated archaeological landscapes. Some are designated heritage assets scheduled or listed on the National Heritage List for England, while others are non-designated heritage assets, according to National Planning Policy Framework terminology. Including the Heritage Local Lists completed by some of the county's districts, the HER is accessible to everyone - you can find it by searching 'Exploring Kent's Past' online.

Anyone can ask for an HER check - if connected to a commercial

**Christmas Cards** Help to raise funds by buying CPRE Kent's charity Christmas cards. We have four designs: barn owl, robin, long-tailed tit and blue tit. They cost just £3.50 for a pack of 10... which is excellent value for money. They are available by calling the office on 01233 714540. And why not give the gift of the countryside and buy a gift membership for a loved one this year? Also available online or from the office. If you tell us it's for a gift we will even throw in a few goodies to make it extra special



planning development, there will be a charge, although a member of the public may get a targeted search free of charge.

The system used by the county's records team is on the GIS database and gives access to Portable Antiquities Scheme data, which include information from metal detectorists. It includes geological, landscape and biodiversity data.

The team are keen that the HER reflects archaeological landscape features as opposed to historic landscape features. Historic landscape features reflect natural habitats with a historic value rather than archaeological features, which are man-made.

They include planted hedgerows; shaws, which are remnants of clearance; banks; ditches and veteran trees - designed landscapes where trees were planted for a specific reason or used as waymarkers.

The sometimes-hidden value of archaeological features can be demonstrated by something as unimpressive as a scrappy hedgerow that is not species-rich but on the alignment of a Roman road and relating directly to a nearby buried ditch.

There is an important difference between historic and archaeological landscapes. The historic landscape features of a wetland, for example, would cover the species present, but its archaeological landscape could explain the reason for its existence - perhaps it had been the site of a quarry.

An environmental statement will usually include a Landscape and Visual Impact Assessment (LVIA) - this relates to the natural environment but doesn't look at archaeological landscapes and assess whether, for example, a hedgerow or lane was used in prehistoric times, perhaps linking a river to a Bronze Age settlement.

The **development control team**, meanwhile, are about fivestrong and consulted by district and borough councils on selected planning applications. Some 600 applications a year arrive from Ashford, although others that might be of interest to the team are not always submitted.

Sadly, heritage is not high on the political agenda and, unless something is of significant designation, planning applications are only rarely objected to on archaeological grounds. More usually, it is a case of working with a developer to allow recording to take place.

Two paragraphs in the NPPF are used most in the team's work:

Paragraph 189 requires local authorities to ensure developers understand the significance of any archaeology on-site. Developers must assess what remains are present and their significance - the council then weighs up any

archaeological harm against the need for development.

The development control team provide the specialist information required and can apply conditions, which, if applied, require the developer to employ an archaeological contractor to carry out the work. The senior archaeologist's role is to ensure the work is done to a satisfactory standard; it must continue right the way through to processing, analysing and interpreting the data before they are published and made publicly accessible.

**Paragraph 199** requires the local authority to ensure that anything destroyed by development is suitably recorded and made publicly accessible.

Other guiding documents include paragraph 8 of the NPPF, which refers to the historic environment, Local Plans, Neighbourhood Plans and guidance from Historic England.

Historic buildings are dealt with by a district conservation officer - sometimes councils need to share resources as turnover of conservation officers is high.

The adopted Ashford Heritage Strategy helps inform the Local Plan. It is also included in Neighbourhood Plans, which are important but too often there is not enough resource for the heritage team to deal with them as they would wish.

Ideally, the heritage team would establish community schemes where interested members of the public could be trained to identify archaeological landscape features to be featured in Neighbourhood Plans.

Capacity to engage in community work is, however, limited so funding from outside sources is sometimes necessary. At the massive Chilmington Green development, for example, a Section 106 agreement funded the running of a community archaeology project, although it was tied to occupation criteria, with the post on hold until the requisite number of houses was occupied.

Nearby areas are keen to get involved - for example Kingsnorth is keen to map its pill boxes - and the team are learning there needs to be more flexibility regarding the areas with which they could be involved.

Despite widespread interest in heritage, archaeology suffers serious underfunding and lack of resources, but there is the possibility of bringing funding streams together. For instance, it is hoped the wording of the S106 agreement at Kingsnorth would enable funds to be used more widely.

Archaeologists cover anything human-made, whether within the worlds of industry, farming, horticulture, health or religion... in essence, anything of cultural importance. They are interested in how something was built, how it was used and what it says about a community. Conservation officers, on the other hand, look at the quality, appearance and value of a building.

Heritage has an inherent value and an importance for our mental well-being because of our need of a sense of time and place. The economic value of heritage gives quality to the environment in which we live, giving a sense of identity in where we come from and whether we like or dislike an area.

People are interested in past generations and many like to take this further. Developments can be more popular if they take account of people's keenness for an identity and desire to belong somewhere.

That human connection between the ages is something developers, when asked to help fund searches related to their schemes, would do well to remember. ■

• For further information, contact the county council's senior archaeological officer Wendy Roberts at Wendy.Rogers@kent.gov.uk

#### Local Plans: an overview

Our list gives the latest situation on Local Plans throughout Kent. In addition, many local authorities have an old-style Local Plan that has 'saved' policies still relevant when considering planning applications. These will gradually be replaced as new Plans are adopted. Details of currently 'saved' policies are provided on local authority websites.



#### Ashford

• The timetable for a new Local Plan is awaited. In response to the nutrient-neutrality issue (poor water quality) at Stodmarsh NNR, the council is working on a Stodmarsh Mitigation Strategy.

#### Canterbury

Regulation 18 consultation (preferred option) took place last summer. Regulation 19
consultation was expected take place at the end of this year but is likely to be delayed
because of the nutrient-neutrality issue at Stodmarsh.

#### Dartford

• Stage 1 examination hearings (legal compliance) have been completed. The examination can proceed to Stage 2 (soundness). A further set of Matters, Issues and Questions is awaited.

#### Dover

 A revised Local Development Scheme was published in November 2021 setting out that Regulation 19 consultation would take place in February 2022 for eight weeks - issues relating to transport modelling and Stodmarsh mean this has now been delayed. The LDS is to be updated.

#### Folkestone & Hythe

• Places and Polices Local Plan was adopted on September 16, 2020. The Core Strategy Review was adopted on March 30, 2022.

#### Gravesham

 Regulation 19 consultation did not take place as planned last autumn; it has been pending resolution of issues surrounding traffic modelling in connection with the Lower Thames Crossing.

#### **Maidstone**

• Examination hearings were due to start on September 6, with adoption expected in January 2023.

#### Medway

 It was intended that Regulation 19 consultation would take place in October 2021; however, it has since become apparent the council might have to 'start again' with its Local Plan after councillors failed to agree plans for a controversial development of 4,000 dwellings at Chatham Docks.

#### Sevenoaks

 A new Local Development Scheme has been published (July 2022). Regulation 18 consultation will take place in autumn 2022 and autumn 2023. Regulation 19 consultation is scheduled for spring 2024, with examination at the end of that year.

#### **Swale**

 A revised Local Development Scheme has been published (July 2022). Further Regulation 19 consultation is due to take place October-December 2022, with examination hearings in June 2023 and adoption early 2024.

#### **Thanet**

A revised Local Development Scheme has been published (June 2022). Regulation 18
consultation is now scheduled for September 2023, Regulation 19 consultation in September
2024, examination in 2025 and adoption 2026.

#### Tonbridge and Malling

• A new Local Development Scheme was published in March. Regulation 18 consultation is expected to take place this year. The Plan is expected to be adopted by summer 2024.

#### **Tunbridge Wells**

• Examination hearings closed on July 14. The inspector's report is awaited.

| District               | Plan   | Oct-Dec<br>2022 | Jan-Mar<br>2023 | Apr-Jun<br>2023 | Jul-Sep<br>2023 | Oct-Dec<br>2023 | Jan-Mar<br>2024 | Notes                    |
|------------------------|--|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|--------------------------|
| Ashford                | Local Plan 2040                                |                 | Consultation    |                 |                 |                 |                 | Adopted<br>February 2019 |
| Canterbury             | Local Plan 2040                                |                 | Consultation    |                 |                 | Examination     |                 | Adopted<br>13.7.17       |
| Dartford               | Local Plan 2036                                | Examination     | Adoption        |                 |                 |                 |                 |                          |
| Dover                  | Local Plan 2020-<br>2040                       |                 | Consultation    |                 |                 |                 |                 |                          |
| Folkestone &<br>Hythe  | Places and<br>Policies Local<br>Plan           |                 |                 |                 |                 |                 |                 | Adopted<br>16.9.20       |
|                        | Core Strategy<br>Review 2020                   |                 |                 |                 |                 |                 |                 | Adopted<br>30.03.22      |
| Gravesham              | Core Strategy<br>Review and<br>Allocations DPD |                 | Consultation    |                 |                 |                 |                 |                          |
| Maidstone              | Local Plan 2022-<br>2037                       | Examination     | Adoption        |                 |                 |                 |                 | Adopted<br>25.10.17      |
| Medway                 | Local Plan 2019-<br>2037                       |                 | Consultation    |                 |                 |                 |                 |                          |
| Sevenoaks              | Local Plan 2015-<br>2035                       | Consultation    |                 |                 |                 | Consultation    | Consultation    |                          |
| Swale                  | Local Plan 2022-<br>2038                       | Consultation    |                 | Examination     |                 |                 | Adoption        | Adopted<br>26.7.17       |
| Thanet                 | Local Plan 2020-<br>2031                       |                 |                 |                 | Consultation    |                 |                 | Adopted<br>9.7.20        |
| Tonbridge &<br>Malling | Local Plan 2031                                | Consultation    |                 |                 | Consultation    |                 |                 |                          |
| Tunbridge<br>Wells     | Local Plan 2033                                | Adoption        |                 |                 |                 |                 |                 |                          |

Regulation 18 consultation: early stage consultation often with open questions and a wider remit for consultation input.

Regulation 19 consultation: views sought on whether the Local Plan is legally compliant and meets the tests of soundness set out in the National Planning Policy Framework (NPPF).

Examination in Public (EIP): hearing held by a planning inspector to assess whether the Local Plan has been prepared in line with relevant legal requirements and meets the tests of soundness.





#### Ashford - Christine Drury

- Developments in Ashford are on hold because of nutrient-neutrality advice from Natural England (see articles elsewhere in this issue). Developers are working out on-site mitigation such as package sewage-treatment systems or purchasing nutrients credits. Nothing is yet signed off as it must fit an overall strategy to be approved by NE. Ashford's problems are in the Stour catchment, although the particular situation is in the Canterbury section of the river: the Ramsar site of Stodmarsh National Nature Reserve. Inevitably, developers are looking at other parts of the borough and Wates won permission at appeal in Tenterden, in the Rother catchment. This this based was on Ashford now not having a five-year housing-land supply a direct consequence of the Stodmarsh issue, so the borough is back in that vulnerable time again.
- Daily planning work is also more difficult with new Arcus Planning software just launched by Ashford Borough Council those convenient weekly lists have gone and navigating the system is slow and clunky; we hope it will be smoother and quicker to use soon.
- There are some big solar-park challenges: EDF has submitted an application to ABC for a large solar farm across Smeeth and Aldington parishes near the converter station at Sellindge, with an even larger one proposed adjacent as a Nationally Significant Infrastructure Project (NSIP). As there is already one on part of the farm holdings, the cumulative impacts would be devastating to landscape and communities. Having walked the footpaths across the area (with difficulty), this is unquestionably productive arable land claimed Grade 3B, of course. The solar farm at Hothfield has settled in well; the connection is unobstrusive and the panels are set back and the screening trees effective. The final proposals were 'shrunk back' to some 60 per cent of the first plan. This is what should happen at Aldington.
  Another solar farm at Chilham by the North Downs Way is being opposed by many and we hope it will stay stuck at the EIA scoping stage.
- The Ashford Environment and Land Mapping Commission will report in December and might be background evidence for the next Local Plan.

#### Canterbury - Sian Pettman

- The timetable for the publication of Canterbury City Council's draft Local Plan is:
- October 19: CCC cabinet expected to approve consultation on the draft Local Plan 2040, along with the Open Spaces Strategy, Tree Strategy and Local Cycling and Walking Implementation Plan
- October 24-January 16: likely dates for consultation on the draft Local Plan
- January-May 2023: analysis of feedback on the draft Local Plan by CCC
- · Post-election 2023: cabinet recommendation to full council for submission of the Local Plan to the Planning Inspectorate
- Publication of the draft Local Plan is expected to raise a series of controversial issues, potentially including the construction of an eastern relief road through the SSSI of Old Park and Chequers Wood in Canterbury and the construction of 5,000-8,000 houses on top of government requirements to help fund the road.

#### Dartford and Gravesham - Hilary Newport

- There was a healthy turnout from CPRE Kent for the July walk organised by the Woodland Trust at Shorne Woods Country Park and Ashenbank Wood, which helped demonstrate how the proposed Lower Thames Crossing would effectively destroy what has been described as the last green space between Medway and London.
  - It is suspected that this year's Local Refinement Consultation on the planned road will prove to be the final consultation before National Highways resubmits its LTC plans.

 We await the resubmission of a Development Consent Order application by London Resort Company Holdings for a theme park on the Swanscombe peninsula. In March the developer withdrew its original application, citing the government's designation of Tilbury as a freeport together with notification of the enlarged Swanscombe Peninsula SSSI (LRCH says the freeport designation means it will need to move its planned ferry terminal from Tilbury to Grays).

#### Dover - Derek Wanstall

- There are great concerns about overdevelopment in the Sholden and Walmer areas, with high-grade agricultural land cultivated for many years being approved for development. Sadly, Kent Highways does not object to access points. The approval of 152 new houses along the busy A258, where two accesses and exits will bisect the historic Miner's Way and compromise the safety of a cycle path, is just unbelievable. With another 155 properties under consideration through an approved access for 110 properties, the total of 265 properties means the associated vehicles will be waiting quite a time to access the A258. As to car-parking in Deal, the general view is "You'll be lucky!".
- · Dover port seems to be operating better, with the Guston checkpoint seeming to have a different objective.
- As to Dover District Council's Local Plan, there are still no outside agencies being involved, no doubt meaning that the examination inspector will have a greater job on his hands. Hopefully, housing numbers can be shared more equally throughout the district.

#### Folkestone & Hythe - Graham Horner

- Some lucky members enjoyed a talk from Nikki Gammans at our AGM. Nikki is the Bumblebee Conservation Trust's project manager for
  the short-haired bumblebee reintroduction on Dungeness and Romney Marsh and told us things most of us never knew about bees and
  what we can do to help them. As members had complained previously about an AGM venue that was difficult to reach by public transport,
  we chose a venue in Hythe, but it was a pity more members didn't come.
- We continue to watch the inexorable progress of two controversial projects: Princes Parade and Otterpool Park. Those district councillors who oppose Princes Parade are in a narrow minority on the planning committee, so we can expect all applications to pass. We remain deeply concerned about the project's financial viability and have voiced our concerns to district councillors, outside the planning process. You might ask why we are not firmly opposed to Otterpool Park and fighting it every step of the way. We don't like it or want it, but given the housing targets imposed by Westminster we see some development around the racecourse as inevitable and the 'least worst' of the options available to meet those targets. The targets themselves are being challenged by CPRE at national level, for example in our response to the Planning White Paper, with some success. Even if those targets are reduced, it's unlikely to be by much. We are therefore concentrating on getting the best outcome for Otterpool Park. We are especially concerned about the phasing, which may impact on Lympne and Sellindge unnecessarily early in the plan. Stanford and Lympne parish councils are members of CPRE so are receiving our full support in their discussions with Otterpool Park LLP.

#### Maidstone - Henny Shotter

- In September we attended the first hearings of the Local Plan review with our planning officer Richard Thompson in the 'hot seat'. CPRE Maidstone objects strongly to the inclusion of two garden settlements in the Local Plan. One in East Lenham is named 'Heathlands' (residents were never asked whether they would like to live in 'Heathlands' for now they live in Lenham Heath). The other is on greenfield land next to Lidsing. Maidstone Borough Council chose two locations right at the border of the district as if they would like to offload the burden of their plans with the neighbouring districts of Ashford and Medway.
  - The argument that the country 'needs more houses' is just not good enough when these developments are on greenfield sites, some in the Kent Downs AONB, some in its immediate foreground and spoiling the view to and from the downs, which is the reason for designation. There are no concrete plans how vital infrastructure can be provided (even sewage works!). All the planned development sites are on best and most versatile farmland, some of it Grade 1. Food crisis? It seems that MBC has never heard of such a thing and its Plan seems stuck in 2014, when it was prepared.

The Plan is, in our opinion, ill prepared and not based on information but predetermined by unrealistic wishful thinking. Many questions are still unanswered at this late stage and MBC has reportedly spent a fortune employing consultancy companies, some of them simply stating they 'would be in the position' to advise. CPRE Kent and others had complained that MBC dished out more and more additional information shortly before the hearings started, with little time to work through them. The inspector, though, was tolerant and started the first hearing. However, by the end of week one, MBC had provided yet more 'new' evidence. This time the inspector concluded it would be unfair to other participants if they were not given time to work through it. The hearings were adjourned until November. Time and money wasted… a familiar story.

#### Sevenoaks - Nigel Britten

- It seems the next Local Plan will not be in place until early 2025. Sevenoaks District Council is not waiting for the government to make its mind up about changes to the planning system. There will be two consultations on the draft, the first this autumn, the second a year on. The first will include development in the urban areas, while the second will also propose sites in the Green Belt where justified. We do have a 'Skeleton Draft of Local Plan', but the very broad statements leave the big questions for later. For example, it says "Community infrastructure should be provided to meet the needs arising from planned growth, particularly in relation to health and education". Well, yes, but who will provide it and when?
  - There is also uncertainty about the amount of development the council will have to plan for. In early June the then Secretary of State Michael Gove said in the House: "It is absurd that in Sevenoaks, which is 93 per cent Green Belt, the current proposal is to build 12,000 houses on 10 square miles. That is insanity." He was right, but so far nothing has changed.
- The Sevenoaks Town Neighbourhood Plan is out for final consultation. The particular issue for us is redevelopment of the Tarmac quarry, north of the town, involving encroachment into the Green Belt. We have commented separately on the draft outline planning application.

• Our committee is still looking for a secretary to relieve our present and very long-serving secretary, Dr Susan Pittman, now 30 years in the job. New committee members are needed more than ever. If you want to help, please email ncbritten@outlook.com

#### Swale - Peter Blandon

- Over the last few months there has been a reorganisation in the structure of Swale Borough Council. A newly-constituted planning and transportation policy working group oversees Local Plan development but has only met a few times. Also, suddenly, the council lost its chief planning officer and the Local Plan is being guided by an interim head of planning services. At the last meeting of the working group, in July, the timetable for the Local Plan review was discussed. The next public consultation will be under Regulation 19 and is planned for the end of the year. Public examination is scheduled for June 2023.
- SBC is unable to demonstrate a five-year land supply and so will find it difficult to oppose some planning applications. Not surprisingly, applications in areas that do not appear as housing allocations in the newly-evolving Plan have been submitted. Local media reported on an application for 2,500 homes, the so-called Bobbing Garden Village, which runs from the A249 north of the A2 almost down to Newington. It is one of the locations considered in the very first iteration of the Local Plan review. However, the current administration is against the garden village idea and also wishes to move development away from Sittingbourne towards the Faversham end of the borough. Although the article says an application has gone in, there is no reference to it yet on the planning website.
- Two large applications for a total of 9,250 dwellings are also in the pipeline. These are Quinn Estates ideas, combining housing and a road running from a new junction with the M2, over the A2 and ending at the northern relief road. The development runs through Highsted valley from the M2, through Bapchild and down to the railway north of the A2. Our committee thought it likely that, after the scoping opinion had been delivered, applications would have followed quickly, with the possibility of an appeal due to lack of determination. However, so far, no planning applications have appeared. The location is an area identified as a possible housing allocation in the current Local Plan but has been identified as being unsuitable for housing in the Plan currently being put together.
- Newington is under a lot of pressure, with a number of planning applications awaiting decision. Two infill sites for 20 dwellings are in the High Street. Gladman's Pond Farm application, on the western edge of Newington, has reappeared with a slightly reduced housing number. It was rejected on appeal in a previous incarnation. All of these will feed into Newington's Air Quality Management Area.

#### Thanet - David Morrish

- · In February we made the following submission to Thanet District Council:
  - Thanet branch of CPRE Kent supports the recent call for the whole future draft Local Plan process to be put on hold in order to enable the council as a whole to get to grips with a number of external issues to ensure that there is a local resolution before any further attention or costs are devoted to the details of Local Plan preparation especially the following matters while we are all awaiting some degree of resolution, which should be up and beyond any simple party politics:
  - Decisions on the likely Manston airport issues [now finally published, in August 2022 see below]
  - New housing forecasts nationally and rational advice on local issues, especially a revised strategy to recognise this as an issue in both ensuring it is local housing need rather than developer housing demand that is being planned for and that there are sufficient Local Plan policy interventions to prioritise local housing need over tourist and second-home demand
  - A proper appraisal of brownfield sites, including new sites such as Saga at Ramsgate, all of which seem to be in the planners' pending tray rather than at the forefront of sensible places for housing, ie related to good public transport
  - A proper appraisal of a transport strategy rather than an 'infrastructure-first approach' to planning, which means, firstly, putting the needs of new residents while not causing any detriment to existing residents at the forefront of all spatial strategy considerations and, secondly, ensuring any additional infrastructure necessary to meet these needs is in place ahead of occupation by new residents.
  - A proper appraisal of the constraints of water supply and drainage. Thanet has been identified as an area of serious water stress by the Environment Agency. There is significant uncertainty as to how this issue is to be resolved, with CPRE Kent and others feeding into the Water Resource South East regional plan.

To date we have not had any response - surprise, surprise!



### Collection boxes

We would like to thank the following businesses for making CPRE Kent collection boxes available to their customers:

- The Charing Stores 4 High Street, Charing TN27 OHII
- Perry Court Farm Canterbury Road, Wye TN25 4ES
  - Premier Stores 14B Godfrey Gardens Chartham CT4 7TT
- Chilham Farm Shop Canterbury Road Chilham CT4 8DX

If you would like to have a collection box on your premises, or know of someone who might, please let us know at <code>info@cprekent.org.uk</code> Otherwise, do please feel free to patronise the above businesses... and you can drop in a few pennies while you're there.





• It was announced on August 18 that RiverOak Strategic Partners, which is behind the plans for a freight hub at Manston airport, has had its Development Consent Order confirmed by Grant Shapps, Secretary of State for Transport, who was "satisfied that there is a clear justification for authorising the development".

The decision followed a redetermination of RSP's application for the DCO after its previous approval had been quashed by the High Court following a judicial review launched by Ramsgate Coastal Community Team.

Although there is still the potential for another judicial review (and a CrowdJustice appeal was opened almost immediately), there is widespread perception that the proposed development will now proceed, at least to some degree.

Thanet CPRE committee has always refused to take a stance on Manston as it is such a divisive issue in the area, but it is interesting to see the Secretary of State return to his true love and raison d'être of aviation by announcing that the reopening of Manston as a freight hub could proceed.

What it means for Thanet is that the seemingly limitless supply of land wanted by council planners for 17,000 new houses cannot now include the Manston site.

#### Tonbridge and Malling - Mike Taylor

• Since Tonbridge and Malling Borough Council's 2018 Local Plan was thrown out a couple of years ago by planning inspectors for failing in the duty to cooperate, we have lived in planning limbo, at the mercy of developers because of the lack of a Plan and five-year housing supply. In that interim period, almost the entire planning department have gone, from the cabinet member and director down to the foot soldiers. This has put a huge strain on those left, but TMBC appointed a new director and she has been assembling a new team - and after much soul-searching TMBC launched a new Local Plan process; the Call for Sites has just finished.

In the last Plan, the Regulation 18 consultation was virtually a complete Draft Plan, cut and dried, take it or leave it.

But TMBC seems to have learned from it past errors and this time the Regulation 18 is actually expecting the consultation to inform the whole process. The consultation questions will elicit the path the Local Plan takes.

This has meant an incredibly complex set of documents, totalling 1,300 pages, so we will have our work cut out in bullying the public and parishes to respond fully, otherwise the process will be hijacked by developers' wishes.

All the big issues such as climate change, Green Belt, active travel and biodiversity are up for consultation, and will all be drafted from the results. The only unchangeable factor is the government's housing figures. For once I support what TMBC is trying to do, provided we can get the public to engage.

- As planning authorities struggle with resources, it has become almost impossible to refuse an application at committee because of the
  financial cost of appeal. But we have found an interesting cross-party method of getting some of what we want. We do not refuse an
  application we defer it for the applicant to review their submission, perhaps for solar panels, better parking, charging points or active
  travel. That puts the developer on the spot they have to improve the deal but aren't sure how far they need to go to get approval so they
  tend to add a little more to ensure they don't get 'deferred' again and risk the financial penalty of another six-week delay.
- This is my last report from Tonbridge and Malling. The chair is being passed to my friend Wendy Palmer, fellow TMBC member and chair
  of Platt Parish Council.

#### Tunbridge Wells - Margaret Borland

- New Local Plan (2020-2038): Examination finished in mid-July. It is not clear when the Inspector's Report will be published or the Plan adopted the examination end date was two and a half months later than envisaged when the Plan was submitted in November 2021. CPRE representatives attended almost all sessions, continuing to put the case for limiting allocations in both AONB and Green Belt and highlighting concerns regarding ineffective use of land in both rural and urban site allocations. There is an issue with the 'standard methodology' for calculating housing need, demonstrated by 2021 Census figures published by the Office for National Statistics in July: total population growth in Tunbridge Wells from 2011-2021 was only 300, but the Local Plan targets delivery of at least 12,204 dwellings over 15 years.
- Planning applications: The Secretary of State's decision on the Turnden appeal, expected in early July, has been delayed. No new decision
  date has been published.

Promoters of sites allocated in the Submitted Local Plan are now submitting planning applications not always fully aligned to allocation policy requirements. Promoters of sites not allocated do not consider the SLP a constraint on their development proposals.

Neither a Five-Year Housing Land Supply Statement nor Five-Year Gypsy and Traveller Pitch Supply Statement as at April 1, 2022, are available. The council considers it can demonstrate supply of only 4.66 years' housing land and 4.4 years of Gypsy and Traveller pitches. Solar-farm proposals are an increasing issue. Sites within the borough at various stages of the application process are demanding more than 100 hectares of greenfield agricultural land, some in or adjacent to AONB and Green Belt, while there are further sites in adjoining Maidstone borough.

#### Historic Buildings - John Wotton

- The committee met in April and July. Our planned visit to Frognal House, near Faversham, had to be postponed.
- We hope it will be possible to work again with the Kent School of Architecture and Planning on the Gravett Architectural Drawing Award in the current academic year, after a break caused by the pandemic.
- We have continued to review threats to heritage assets around the county, commenting ourselves or providing advice and assistance to district committees on applications for listed building consent, planning applications affecting heritage assets and Local Plan policies on heritage.
- Members of the committee hope to participate in a virtual round table in September, organised by three government departments, on adapting historic homes for energy efficiency.
- · We remain in need of new members, especially to cover Ashford, Gravesham, Maidstone and Tonbridge and Malling.



# Out and about

CPRE Kent will have been at 11 events across the county during 2022 by the time it draws to a close, writes Vicky Ellis.

At AgriSouth, the work that had gone into preparing the crops and wildflowers for the show, at Faversham Showground, was simply amazing, especially the wildflowers, which drew out all the photographers from the crowds.

The sight was truly spectacular - vibrant and buzzing with bees, with poppies, sunflowers and cornflowers among the wonderful

flowers on display. It was so lovely to see and a huge hit.

We were also at the Kent County Show. We had a plants quiz, where visitors had to match the seed to the grown plant, although it was sad that many children, including teenagers, did not know what a dandelion was.

We also made wildflower seed bombs using peat-free organic compost, flour, British native wildflower seed mix and water. The seed bombs were then placed into a handmade newspaper pot for the children to take away.

We would like to say thank you to all our dedicated volunteers who give up their time to help – we really could not do these events without you.

A special thank-you must go out to Alastair Holt, who regularly sacrifices precious time as a busy farmer to travel up and down Kent lugging our tent, and much more, from venue to venue.

If you would like to join us and help at events, please call me, Vicky, on 01233 714540 — we would love to welcome you on board.

 You can see more pictures from AgriSouth at www.cprekent.org.uk – search 'AgriSouth'

## Events 2022

Where we've been... and where we're going to be

Farm Expo, Detling Wednesday, March 2

Living Land, Detling Friday, May 6

Kent Garden Show, Detling Friday-Sunday, May 27-29

AgriSouth, Faversham Showground Thursday, June 30

Kent County Show, Detling Friday-Sunday, July 8-10

Whitstable car park Sunday, July 17

WKPM, New Barn Farm, Hawkenbury Saturday, September 17

EKPM, Little Mongeham Wednesday, September 28

Whitstable car park Sunday, September 11

Green Christmas Fair, Faversham TBC

# Help protect the future of Kent's countryside with a legacy gift

By remembering CPRE Kent when considering your will, you can help ensure we will be here protecting the Kent countryside well into the future.

If you are thinking of having a will written, or have an existing will, please think about leaving a gift, no matter how small, to CPRE Kent.

To find out more, contact Vicky Ellis 01233 714540 vicky.ellis@cprekent.org.uk

# Gift of Membership



Have you considered the gift of CPRE Kent membership?

CPRE Kent's membership is in serious decline.

Without our members we would not be able to protect the countryside from inappropriate planning decisions or campaign on litter issues and biodiversity at a time when there is unprecedented pressure on green spaces and protected areas. Nature is under serious threat.

Please consider giving a CPRE Kent membership when making a gift to a friend or family member.

Let us know it is a gift and we will send a card and small present to make it special.

You can write to us at:

CPRE Kent, Queen's Head House, Ashford Road, Charing, Ashford, Kent TN27 0AD; email info@cprekent.org.uk; or phone us on 01233 714540.



Bring the countryside into your garden and help raise funds for CPRE Kent by buying some of our nature-friendly merchandise.

Each item is priced at just £10. All are available by emailing info@cprekent.org.uk or by calling Vicky on 01233 714540.

# Lottery results

Here are the Lottery winners since the last edition of Kent Countryside Voice:

#### April 22 Mr A Terry £50 Mrs M Palmer £30

Mr S Winn £20 Dr F Simpson £10

#### July 22

Mrs M Palmer £50 Mr & Mrs Harvey £30 Mr & Mrs Williams £20 Mr A Terry £10

#### May 22

Mr M Edwards £50 Mrs P Manger £30 Mr A White £20 Mrs B Heffer £10

#### August 22

Miss A Taylor £50 Mr M White £30 Mr T Croft £20 Mrs M Fox £10

#### June 22

Mr S Winn £150 Mr L Wallace £50 Mrs S O'Neil £30 Mr P Stevens £20

#### September 22

Mr R Stickland £50 Mrs M McFarlane £30 Miss J Lushington £20 Mr S Winn £10

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#### CPRE Kent,

Queen's Head House, Ashford Road, Charing, Ashford, Kent TN27 0AD.

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| Name(s) of account holder(s)          |                            | Instruction to your bank or building society Please pay CPRE Direct Debits from the account deta safeguards assured by the Direct Debit Guarantee. I unde | rstand that this Instruction may remain  |  |
| Bank/building society account number  |                            | with CPRE and, if so, details will be passed electronically   | to my bank/building society.             |  |
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