

Spring-Summer 2022

# Kent Countryside

# Voice

## The big question

What is the most important animal of all?



## Call to action

Hundreds join peaceful marches in protest at building onslaught

## Busting the housing myth

How government policy is destroying our green spaces... and making homes unaffordable



The countryside charity  
Kent





Two species of seal are encountered around the Kent coast. This is a common seal, also known, often appropriately in our area, as harbour seal (Steve Ashton)

Cover: The eyes have it! Only an irregular breeder in the county, the strikingly beautiful short-eared owl can spark a coastal walk to life (Steve Ashton)

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*contact us*

[www.cprekent.org.uk](http://www.cprekent.org.uk)



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](mailto:info@cprekent.org.uk) or call 01233 714540.

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Hilary Newport

## Director's report

**There were shocking news headlines last summer when the full scale of Southern Water's astonishing record of environmental pollution became clear in the press: the company had been fined £90 million and forced to pay £126m in penalties for repeated breaches of the law in its decision to discharge many tonnes of unprocessed sewage into our rivers and seas - many of them from outfalls around Kent's coastline.**

The law accepts that in exceptional circumstances, when unusually intense rainfall overwhelms the capacity of the treatment works, wastewater treatment companies are temporarily allowed to discharge excess raw sewage. The scale of the breaches that came to light told a horrifyingly different picture: these discharges were occurring even in situations where there was no rainfall to overwhelm the treatment works. The company was accused of deliberately failing to invest in upgrades to its infrastructure to save money - arguably saving far more money than was actually incurred in the fines and penalties imposed by the courts.

Disquieting though this episode was, it is part of the bigger picture of over-exploitation of our natural resources and nowhere is this more apparent, particularly here in the South East, than in our water ecosystems. Our much-missed trustee Graham Warren wrote in 2006 of the need for a comprehensive water resource strategy for Kent and the South East that recognised the housebuilding targets fuelled by the (then) growth areas of the Thames Gateway and Ashford were incapable of being met by the average annual natural rainfall available within the area. Things have not improved since then.

The CEO of the Environment Agency, Sir James Bevan, gave a speech in 2019 in which he referred to "the jaws of death" - that point in the water companies' charts of future demand and availability of water where the lines cross and the public demand for water outstrips the supply. The climate crisis is a significant driver of this pressure, making rainfall more intense and erratic, while population growth focused on the South East exacerbates the imbalance that already exists.

The solutions are laid out before us: we must use less water and use it more wisely. We must invest in ways of making our water supply more resilient. And most importantly we must bring a halt to the absurd situation in which water

companies are obliged to keep pace with the demands of housebuilding without having any influence over where those houses are to be built.

That's why we were pleased to participate in the current consultation on water availability in the region. Water Resources South East is an alliance of the six water companies that serve the region with its drinking water and, alongside the four other water supply consortia that cover England, it is consulting on its plans to deliver a sustainable future for water supply.

This cross-boundary work is a much-needed step forward. This is the first time that such cross-regional collaboration has happened and it is in fulfilment of one of the pledges of the government's 25-year environment plan, namely to leave the environment in a better state than we found it. Each water company in each of the five regions of England will need to demonstrate how it will reduce demand, cut leakage rates, develop new supplies (such as water re-use and even desalination), transfer water to where it's most needed and reduce the use of environmentally damaging drought orders.

Nevertheless, these plans can't change the fact the South East is exceptionally water-stressed. Our hard work over the past two years addressing the most damaging consequences of the proposed changes to the planning system appears to have paid off, with the government putting 'on hold' the proposed reforms that would have taken many planning decisions outside of the proper democratic routes.

While we wait to see what the government's proposals on 'levelling up' will actually look like, we can continue to hope and press for a coherent spatial planning system that allows our environmental limits to be properly respected: water is by no means the only one of those environmental limits, but it is the most important.

The abuse of Kent's rivers and seas was brought into sharp focus in July last year at Canterbury Crown Court, where the judge said Southern Water's offences had shown "a shocking and wholesale disregard for the environment, for the precious and delicate ecosystems along the north Kent and Solent coastlines, for human health and for the fisheries and other legitimate businesses that depend on the vitality of the coastal waters" (Julie Davies)



# Blinded by the lights

A vast glasshouse complex in Thanet has been identified as one of the greatest sources of light pollution in the country. **Steve Geliot** has been researching the potential impact on both people and wildlife and suggests that it really should not be too difficult to design commercial structures that are kinder to us all.

In 2001 a movie called *The Glass House* tanked at the box office and lost a lot of money. Released just days after the 9/11 attacks, you could put this down to being the wrong film at the wrong time, but critics were generally in agreement about its shortcomings. The website Rotten Tomatoes says: “Due to obvious plot twists and foreshadowing, *The Glass House* fails to thrill. By the end it degenerates into ludicrousness”.

Birchington has what some could regard as a ludicrous glasshouse story of the literal variety - one that, in terms of environmental credentials, might merit a rotten tomato or two.

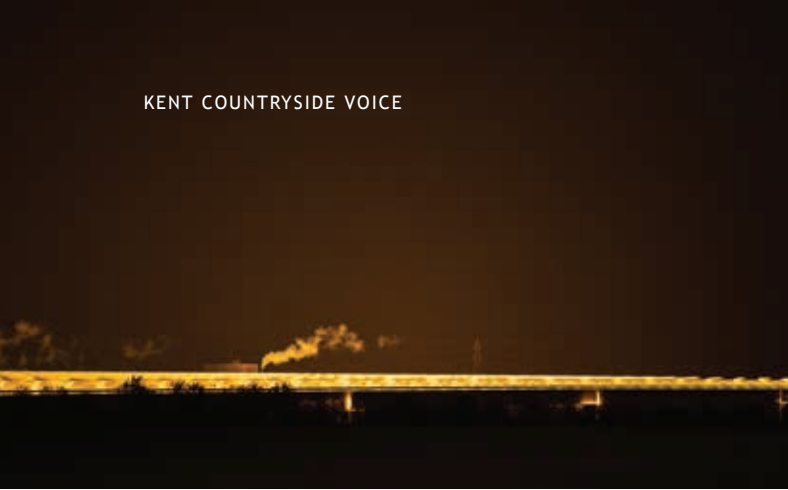
In my work as a campaigning artist, I have found myself becoming a citizen scientist using remote sensing from satellites to map and measure light pollution, thanks to

some amazing mentoring from Professor Chris Kyba in Potsdam.

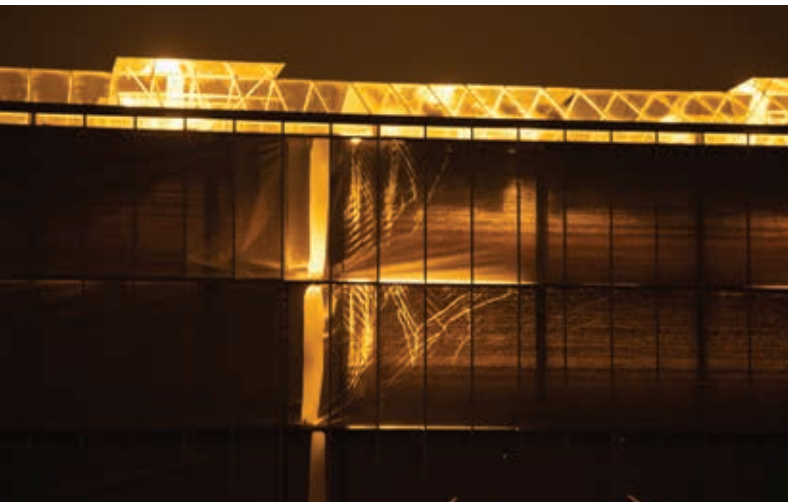
The group of glasshouses near Birchington known as Thanet Earth stands out as one of the worst sources of light pollution in the entire country.

Its green-and-blue-branded website states that the site grows tomatoes, cucumbers and peppers - vegetables that one might normally import from the sunnier parts of southern Europe. This could potentially be a good thing since it avoids emissions created by long-distance hauling of produce.

The website boasts that “Britain’s leading glasshouse complex sits proudly within the landscape of East Kent” and adds that “innovation, environmental concern and a ▶



◀ Thanet Earth is regarded as one of the worst sources of light pollution in the country (Steve Geliot)



◀ 'When I visited at night and photographed this impressive volcano of light pollution I could see no evidence of any blinds' (Steve Geliot)

focus on quality combine with cutting-edge technology, international expertise and the best growing conditions in the UK to produce unrivalled taste on a commercial scale".

If we are avoiding all the carbon emissions of shipping produce from Spain, surely these are fair claims?

Well, maybe not. I'm not an expert on hydroponics, so I don't know what sort of chemical fertilisers or pest and disease controls are used, or if any of these things find their way into the environment. However, as well as having a rough idea of electricity consumption, we can measure the light emissions without putting a foot on the site.

The units (summed radiance nW/cm<sup>2</sup>sr) can seem confusing, so let's make a quick comparison. An area of about 4 sq km in the West End of London, including Leicester Square, emits about 3,600 units and is actually decreasing in brightness by 0.5 per cent a year, owing to small improvements in street-light design. By comparison, the same area at Thanet Earth is emitting about 1,200 units, and this is increasing annually by an average of 12.5 per cent a year. That, by my reckoning, is three times as bright as central London.

Its website accepts Thanet Earth uses some 40,000 lights, each of which is 1,000 watts. Just think about it for a moment: that equates to some 40 million watts of electricity being used.

The Eye Hortilux High Pressure Sodium bulbs used are not efficient and pump out a huge amount of heat. I know because I bought one to test.

The lights at Thanet Earth come on at night but can also be used during the day to supplement daylight - so can potentially be burning for lengthy periods of time during winter.

Thanet Earth told us its uses "a system of blinds in the greenhouses" but that "for ventilation purposes we have to leave small gaps where the blinds meet. The blinds are also not 'black-out' blinds".

However, when I visited at night and photographed this impressive volcano of light pollution I could see no evidence of any blinds. There was some ragged black plastic mesh on the sides of the glasshouses, but a vast amount of light and heat was bouncing straight up into the sky without any effective measure to contain it.

If we are going to take any environmental claims seriously, we need to see some comparative figures for the emissions involved in transporting tomatoes from Spain against the emissions, including light emissions, from these glasshouses. Only then can we assess what is going on from a net-zero perspective.

Why does it matter? Well, the climate-busting use of electricity is obvious, but science is showing that artificial light at night (ALAN) is driving insect declines and impacting on bird migrations, while evidence is growing about the ways in which light pollution impacts human health.

Artificial light increases obesity rates and drives anxiety and depression, especially in teenagers. That is why the screen colour of iPhones changes in the evening. These well-researched harms to your health are known and manufacturers don't want to be sued.

Chronic exposure to artificial light at night also makes it a little more likely that pre-cancerous cells in breast tissue change and become active cancer. If someone already has breast cancer and is on a drug called Tamoxifen, then that drip-drip chronic exposure to artificial light at night can make the





The skies above Thanet Earth appear to be ablaze on some nights (Steve Geliot)

Tamoxifen less effective and reduce the chances of recovery. Artificial light at night and poor sleep are also implicated more generally in inflammatory illnesses, while there is growing evidence about its role in thyroid cancer.

We can take a more detailed look at how light pollution affects birds. I have been filming the iconic starling murmuration here in Brighton for the last eight years and as part of that have been learning about the science of how and why these dazzling birds do it.

I have also investigated the causes of the dramatic declines that have brought our Brighton murmuration from 100,000 birds in the 1960s to 10,000 last year and just 6,500 this year. The main cause is thought to be insect declines, meaning the starlings don't have as much to eat.

These insect declines are caused primarily by pesticides, but light pollution also plays a significant role in driving insect decline. Maybe there is even more to consider. Our dwindling UK starling flocks consist of birds that live here year-round that are joined in autumn by many hundreds of thousands that migrate to the UK from areas of north-east Europe with cold winters.

These migrations across the North Sea between The Netherlands and Norfolk take place at night. The Dutch and Belgian coasts are the brightest part of Europe due to the hundreds of greenhouses similar to Thanet Earth. This light pollution, mainly from the area known as Westland, close to Rotterdam, is six times as bright as that in New York.

To navigate at night, starlings, as well as many other birds, use a sense called magneto-reception, meaning they can literally see Earth's magnetic field. However, it is quite a subtle sense and seriously disrupted by light in the

yellow to red part of the spectrum, which is exactly what is emitted by these huge greenhouses.

Starling mortality appears to be occurring mainly in juveniles failing to make it past their first year. Juveniles have not yet established or learned their migration route, so their first journey is an epic challenge. Their magneto-reception is only just forming and is probably weaker and more vulnerable to this kind of sensory pollution. My theory, and it is only a theory that has yet to be researched, is that some losses might be explained by juvenile birds not successfully navigating their first migration past that huge wall of light on the Dutch coast.

Brightly-lit glasshouses in the UK will probably also be problematic for bird navigation.

If you mess with the natural day-night arrangement to the extent that is happening at Thanet Earth, and on an even larger scale in Westland, you are not really a friend to wildlife and it is questionable whether you are a friend to the wider community.

If we take a forensic look at the cost of these huge, arguably badly-designed glasshouses in terms of climate, in terms of wildlife and in terms of human health, we can only conclude that, in this instance at least, modern farming degenerates into ludicrousness.

Environmentally speaking, I believe these really are rotten tomatoes. It is frustrating because it is simply a matter of design. We have world-class glass manufacturers in the UK, so surely it would be possible to develop a world-class design for a glasshouse that allows light in but doesn't allow light out. ■

# Laying the building myth to rest



Top: Despite high levels of housebuilding in Canterbury, 'affordable housing' remains out of reach for many of its residents (John Fielding)

Above: And the build goes on... but it's not of much use to local people wanting a home

Main: The Stour Valley is a celebrated stretch of landscape downstream from Canterbury but is subject to huge pressure from urban development (Richard Brooks)

In this concerning piece, **Richard Thompson**, CPRE Kent planner, spears the ridiculous notion that simply building more houses will make them more affordable. He highlights that this concept underpins the standard methodology for calculating housing numbers, which, if left unchallenged, will lead to yet more sacrifice of greenfield land to expensive market housing without the needed delivery of truly affordable housing.

**An article published in the county's media<sup>1</sup> as winter drew to its close highlighted the absurdity of government thinking that private-sector housebuilding alone would solve the housing affordability crisis.**

The fact is, while ever-more houses are being built, the gap between house prices and earnings is still increasing, while much-needed affordable housing is simply not being built.

A stark example of this national policy failure at the local level can be found by looking in detail at the provision of affordable housing in the Canterbury district over the last 10 years.

Within Canterbury district, the average cost of a new-build dwelling has increased from £160,476 in September 2011 to £317,381 in September 2021<sup>2</sup>. That's almost a doubling of prices in 10 years.

Unsurprisingly, this market price is not affordable for most Canterbury residents. In fact, Canterbury City Council itself considers an income of more than £75,000 would be required to buy a house at this price without assistance<sup>3</sup>.

It believes this equates to only 2 per cent of the population of Canterbury. Or, put another way, 98 per cent of Canterbury residents cannot afford a new-build home on the open market in the district on their incomes alone. Assistance therefore comes via affordable home-ownership 'products' such as Help to Buy and shared-ownership schemes. These all fall within the formal planning definition of affordable housing as set out in the National Planning Policy Framework (NPPF). However, many of these affordable home-ownership products are still not actually affordable to most Canterbury residents.



Affordable Home Ownership Options Scheme	Income Required	Households Unable to Afford (all households)	Households Unable to Afford (private renters)
Help to Buy: Equity Loan (20%)	£67,018	95%	98%
Help to Buy: Shared Ownership (50%)	£60,419	93%	97%
First Homes (30% discount)	£52,567	90%	94%
Help to Buy: Shared Ownership (25%)	£50,790	90%	93%
Rent to Buy (80% of median rent)	£23,323	32%	46%

The table below assesses each of the different affordable home-ownership products against the income required to afford them and then considers what percentage of the district would not be able to afford these products<sup>4</sup>. Yes, you have read correctly - it is the council's own assessment that 98 per cent of Canterbury residents who currently rent are considered unable to afford the government's flagship Help to Buy: Equity Loan scheme. Across all the schemes, at best, only 54 per cent of current renters would be able to afford the 'cheapest' rent-to-buy route to home ownership.

For those left, the only option is to rent. However, paying open-market rents is deemed unaffordable for 45 per cent of households in Canterbury.

For this group, there are two types of rental products that fall within the formal planning definition of 'affordable housing'. The first is affordable rent, which in Canterbury is some 86-97 per cent of the cheapest market rents, *ie* not necessarily that affordable and subject to usual market price rises. The second is the social rent, which is set according to a complex formula but is typically between 50 per cent and 60 per cent of market rent. This is the cheapest route to accommodation and in Canterbury is about £435 a month.

It is unsurprising then that the council considers the most pressing affordable housing need for Canterbury is for the genuinely affordable social rent homes. It considers 231 social rent homes are now required a year. There is then a lesser need for affordable home-ownership products (156 required a year) and then affordable rent homes (77 required a year). In total that's 464 affordable homes required a year in Canterbury.

However, Canterbury City Council, like most Kent councils, does not generally build houses. Rather, the current model is that a developer is expected to use a small proportion of the financial gain it gets from a grant of planning permission to provide a certain number of affordable houses alongside the market houses it sells. In Canterbury, the target is that 30 per cent of all homes built should meet the NPPF planning definition of affordable (though until 2017 was set at 35 per cent for the Canterbury Urban Area).

So how many affordable homes have been provided in Canterbury under this model over the last 10 years? The next table sets out how many of each type of affordable house has been built over this period and quite clearly shows it to be nowhere near enough. ▶

Year	Affordable rent	Affordable home ownership	Social rent	Total
2011/12	18	33	93	144
2012/13	10	53	58	121
2013/14	10	10	50	70
2014/15	40	0	0	40
2015/16	20	30	0	50
2016/17	38	10	0	48
2017/18	9	36	0	45
2018/19	19	37	0	56
2019/20	40	55	44	139
2020/21	35	22	0	57
<b>Total</b>	<b>239</b>	<b>286</b>	<b>245</b>	<b>770</b>

That's barely a current year's requirement of social rent homes built in total over the last 10 years. Amazingly, in six out of 10 years not a single social rent home was built. With an overall total of 6,097 new homes having been built within the Canterbury district across this period, that equates to 12.6 per cent affordable homes built across all types against the target of 30-35 per cent.

So why are the required affordable houses not being built by the development industry? For many, the main reason is that current government policies allow levels of affordable housing to be reduced if a development is not deemed 'viable'.

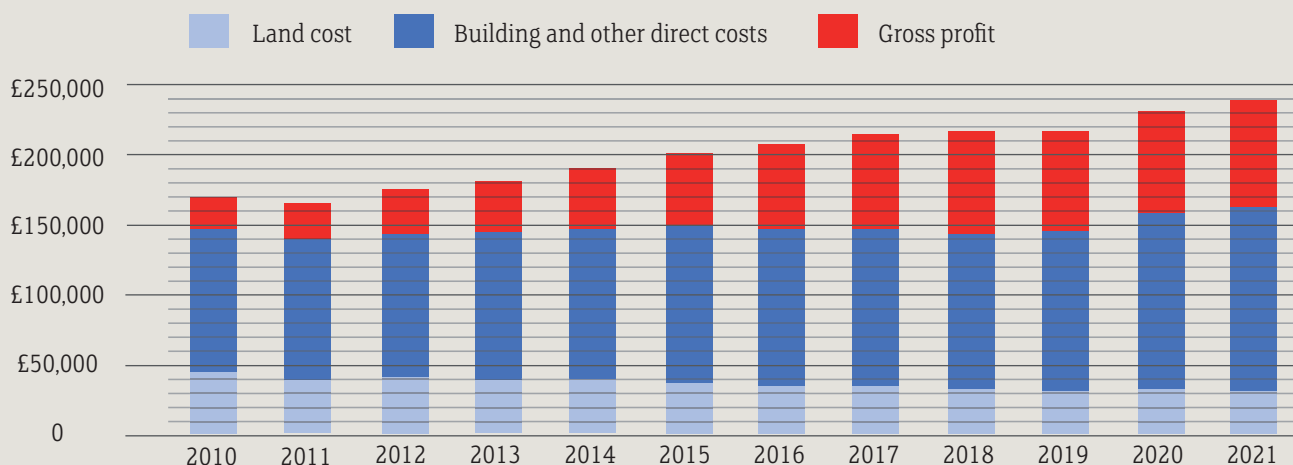
In the simplest terms, a development is not deemed viable if it can be demonstrated a developer would make a profit of less than 15-20 per cent once all set costs are accounted for. Significantly, one such set cost is an agreed premium to buy the land by the developer that is usually 20 times the existing value of the land though can be as much as 40 times!<sup>5</sup> Added to this, the greater the perceived need for housing, the lower the ability of the council to negotiate, particularly if the council is subject to the 'tilted balance' presumption in favour of granting planning permission.

Despite this, the development industry maintains the problem is simply that not enough homes are being given planning permission. The argument goes that if they were given more permissions to build more houses, then of course more affordable houses would be delivered and market housing would become more affordable.

While the above record in Canterbury suggests otherwise, this argument is flawed for other reasons.

For starters, it can be argued that there is already sufficient planning permission or land available to build on. In Canterbury, there is either an existing planning permission or an identified Local Plan land allocation for 12,334 new homes<sup>6</sup>. Specifically with respect to affordable housing, as of March 2021, there were 1,757 social/affordable rental units with permission in the pipeline. This is more than double the number of affordable homes built in Canterbury over the last 10 years. Despite this, Canterbury has just failed the government's Housing Delivery Test for not building enough houses, meaning the district is now subject to the presumption that planning permission will be given even

## Persimmon Profit and Cost per New-build House



While the intricacies of viability appraisals are a topic of concern in themselves, the fact is housebuilder profits are soaring all the while the current system is not delivering affordable homes on the ground.

In 2021, when not a single social rent home was built in Canterbury, the four biggest UK housebuilders - Persimmon, Berkeley, Taylor Wimpey and Barratt Homes - reported pre-tax profits of £784 million, £504 million, £492 million and £264 million respectively.

If we delve into this a little deeper, we can see it is developer profit margins alone that have soared over the last 10 years, with the costs of buying development land and cost associated with physically building houses broadly staying the same. This can clearly be seen in the below chart taken from housebuilder Persimmon's 2021 financial results presentation dated March 2, 2022. The chart gives a total cost breakdown of an average Persimmon new-build home showing that the gross profit element has gone from accounting for £20,763 of the cost of a new-build house in 2010 to £74,481 per house in 2021. That's more than a tripling of profit margins.

if in conflict with the adopted Local Plan. As has been pointed out by CPRE Kent, this is absurd.

There is also the small matter that housebuilders are quite simply not going to build at a level that over-supplies a local housing market, forcing them to reduce prices and lower profits.

The absorption concept was most recently highlighted by Sir Oliver Letwin in his government-commissioned independent review of buildouts. Here he found the "fundamental driver of buildout rates once detailed planning permission is granted for large sites appears to be the 'absorption rate' - the rate at which newly-constructed homes can be sold into (or are believed by the housebuilder to be able to be sold successfully into) the local market without materially disturbing the market price". Alongside this, there are practical constraints such as the current labour and materials shortages.

However, and perhaps most significantly, it is housing market demand rather than need that drives affordability. Currently



this demand is being fed as much by monetary policy and financial markets as by physical shortages. Low interest rates and readily available mortgage credit, coupled with state assistance policies such as Help to Buy equity loans, are arguably allowing those already in the position to buy a house to offer ever more. They are often bidding against others in a similar position, pushing the market prices up in the process. Meanwhile, those not already in a position to buy get left even further behind.

### So why does this matter?

At the superficial level, CPRE Kent and other similar organisations are often accused of denying local communities much-needed housing when we object to yet more greenfield land being lost to market housing. Taking the Canterbury example, however, the council itself is accepting the new-build market housing dominating the supply is simply not affordable to most existing residents in the district. For those existing residents, they are losing greenfield land important to them to satisfy a wider market demand rather than for their direct benefit.

At the far more important level, though, this matters because the government's current standard method for calculating how many houses a district needs is linked directly to housing affordability within that district. That is, the bigger the gap between new-build house prices and median earnings in a district, the higher the housing number for that district is. And the government rationale for this is that by building more houses, the cost of housing will come down...

This problem is increasingly urgent. The government affordability data are released on an annual basis, with the 2022 data due on March 23, just before we went to print. On release of these data, housing targets for each council can change overnight. With it reasonable to assume that the gap between house prices and earnings is likely to have widened over the last year for much of Kent, the consequences for the county could be dire.

The need to revisit the standard methodology for calculating housing is urgent. The need to rethink how we deliver truly affordable housing in a way that doesn't sacrifice greenfield land to bolster developer profits is arguably even more urgent. ■

## 'Affordable housing' schemes

The formal planning definition of affordable housing is set out in Annex 2 of National Planning Policy Framework (NPPF) and, at almost 500 words long, is rather complicated and hard to understand. The below non-exhaustive list, however, sets out the most popular schemes that currently fall within this formal planning definition of affordable housing:

Type or tenure	Description
Social rent	These properties are provided by local authorities and some registered providers. The rent for these properties will be set at a level dictated by the national rent regime. Social rented properties are the most affordable and what people usually understand as being meant by 'council housing'.
Affordable rent	These properties are provided by local authorities and registered providers and are subject to a control that in theory requires the level to be no more than 80% of local market rent. In practice and, as demonstrated in Canterbury, this is not always the case.
Shared ownership	Previously known as 'part buy, part rent', households buy a share of the property and the remaining share is rented. In time, future shares can be purchased and the property could be bought outright/subsequently sold at market rates (though some restrictions might apply in very limited circumstances).
Shared equity	The applicant purchases a share in the property and no rent is paid on the remaining share, but the purchaser is able to buy further shares in the property until it is owned outright. The house can subsequently be sold at market rates
Help to Buy equity loan	The government provides households with an interest-free loan of 10% or 20% of the cost of a new home for a period of five years; purchasers require a mortgage and at least a 5% deposit. The house can subsequently be sold at market rates
First Homes	First Homes is a new scheme designed to help local first-time buyers and key workers on to the property ladder by offering homes at a discount of 30% compared with the market price. It is intended that the discounts will apply to the homes forever.
Build to Rent and Rent to Buy	These properties are usually built as blocks of flats. The property is rented for a set period during which time the tenant saves enough for a deposit to purchase the property at the end of the rental term.

### References

<sup>1</sup> [www.kentonline.co.uk/kent/news/32-per-inch-who-are-pricey-kent-new-builds-for-261858/](http://www.kentonline.co.uk/kent/news/32-per-inch-who-are-pricey-kent-new-builds-for-261858/)

<sup>2</sup> UK House Price Index - HM Land Registry Open Data

<sup>3</sup> Canterbury City Council Housing Needs Assessment 2021 - [https://drive.google.com/drive/u/0/folders/1BCdWC6ME7X\\_b6szgA1E5knDlsta1ooTY](https://drive.google.com/drive/u/0/folders/1BCdWC6ME7X_b6szgA1E5knDlsta1ooTY)

<sup>4</sup> Again taken from the September 2021 Canterbury Housing Needs Assessment

<sup>5</sup> See - [https://lichfields.uk/media/6509/fine-margins\\_viability-assessments-in-planning-and-plan-making.pdf](https://lichfields.uk/media/6509/fine-margins_viability-assessments-in-planning-and-plan-making.pdf)

<sup>6</sup> Canterbury Authority Monitoring Report 2020-2021

<sup>7</sup> Final report - <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>



# Chairman's Update

**John Wotton**

## Horrorifying events that put everything else into perspective

**I am writing this update on day 11 of Russia's invasion of Ukraine and cannot know how the situation will have developed during the intervening weeks before you read this edition of Kent Countryside Voice. Suffice it to say that we are all horrified by the appalling violence unleashed upon the people of Ukraine by their overbearing neighbour and support them in their struggle to maintain their independence and democratic rights.**

Such mighty events serve to put into perspective the consequences of the Covid-19 pandemic, which is fortunately now receding to the point at which we in Kent may resume our normal activities with confidence and relief.

It was a real pleasure to see so many of you at our AGM in Lenham in November after so long a period of online meetings. Hopefully, that phase is now behind us, but we'll continue to make use of our new online conferencing facilities at Charing to ensure everyone is able to participate in our activities.

A great deal is happening to national CPRE at present. They have just moved into new London office premises in Provost Street, near Old Street Underground station, at a considerable rental saving compared with their previous premises.

Some of you might have received, as I have, an urgent appeal for funds by national CPRE, who have suffered a severe drop in income during the pandemic.

I hope you will support this appeal if you are able to, as the strength and financial stability of the national charity is essential to support the work of the branches throughout the country, including CPRE Kent. The trustees of national CPRE will be visiting Kent in May and we look forward to discussing our work with them.

CPRE Kent's finances, I am pleased to report, remain sound. We are able, chiefly through a combination of membership income and the return on our investments, to cover most of the day-to-day expenses of CPRE Kent, including the salaries of our outstanding and dedicated professional staff at the Charing office.

Our resources are tiny in comparison with those available to developers, as participating in a recent planning inquiry brought home to me. They allow for only limited expenditure on campaigning, without drawing on our reserves, so we try to raise funds for each campaign we run. I hope you will feel able to donate generously to CPRE Kent from time to time, to help us make a bigger impact. I hope you will also encourage your friends and acquaintances to join CPRE Kent and become involved in our work. We are starting to advertise for new volunteers on a platform developed by national CPRE.

For some time, national CPRE and the branches have been discussing ways of making the CPRE network more effective. This work goes under the title Building the Movement and two reports by consultants The Connectives have been produced and are under active consideration. We have always participated fully in the CPRE network and value the opportunity

to share ideas and experience with the other branches and national CPRE. No significant changes can be made without the agreement of the branches, and the trustees of CPRE Kent will seek to ensure that the interests of the Kent branch are protected in this exercise. I expect to have more to report to you on this subject in the next edition of Kent Countryside Voice.

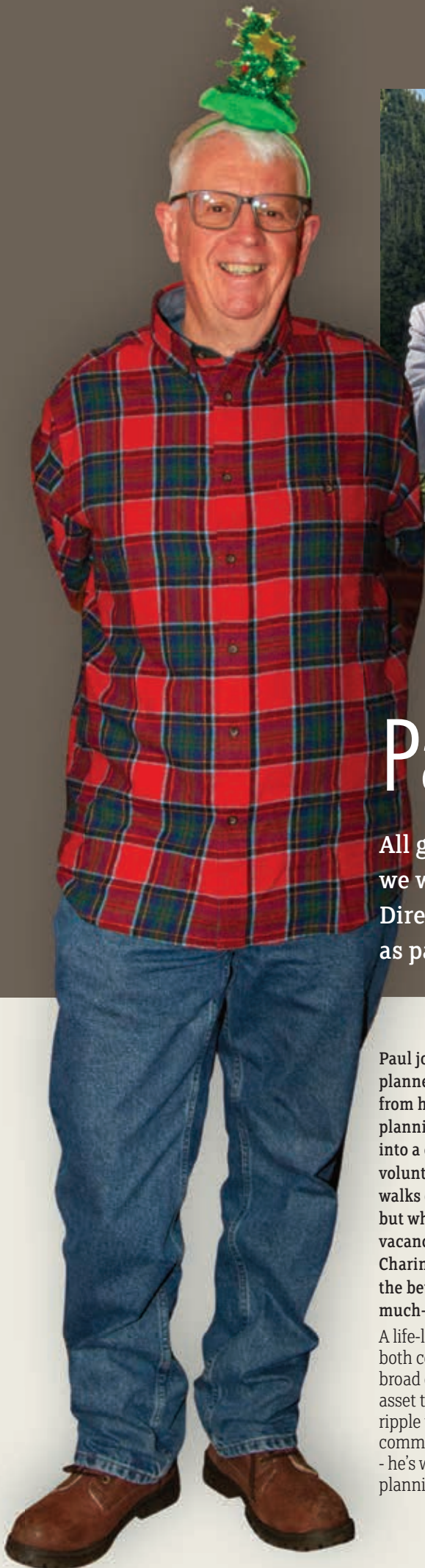
Our work to protect the Kent countryside continues at the usual high level of intensity, as described in the district reports in this edition, with excellent collaboration between staff and the district committees on Local Plans, major developments and planning appeals.

The refusal of Quinn's appeal over Broke Hill, described in the Sevenoaks report, is a very welcome outcome. Nigel Britten and the Sevenoaks committee are to be congratulated for their work on this case. A similar decision concerning Hawkhurst Golf Club is equally welcome. It remains to be seen whether these are straws in the wind or a sign that inspectors are giving more robust protection to the Green Belt and AONBs.

Sadly, at the end of March, we said goodbye to Paul Buckley, who for several years has brought to our work the knowledge and wisdom he acquired in the course of a long and distinguished career in planning for local authorities in Kent. We shall miss him and wish him well in his retirement.

Thank you all for your support for the past six months. We have achieved a lot, but the pressure on our precious countryside is as great as ever and we have much to do to protect it.





Paul's remarkable photographs have enlivened our magazines and website over the years



A love of good planning brought Paul to CPRE Kent in 2015 and he became a valued team member

# Paul's leaving us!

All good things must come to an end and this spring we waved goodbye to senior planner Paul Buckley. Director **Hilary Newport** looks back on Paul's time as part of the CPRE Kent team.

Paul joined CPRE Kent as our senior planner in 2015. He had already retired from his full-time post at Dartford's planning department in 2012, settling into a challenging round of gardening and volunteering (including leading health walks on behalf of the local council), but when we advertised for a part-time vacancy to join the team at the office in Charing his love of good planning got the better of him and he soon became a much-valued member of the team.

A life-long planner, Paul has worked in both county and district planning and his broad experience has been an invaluable asset to CPRE Kent, settling in without a ripple to work alongside staff and district committees to deliver a prodigious output - he's worked on minerals and waste planning and on matters such as London

Resort theme park and the Lower Thames Crossing, as well as on countless Local Plan consultations and examinations.

He has also advised CPRE Kent members and others on how they can best respond to planning applications and challenges that are causing them concern.

Paul's other interests include photography, and we are indebted to him for some remarkable photos that have illustrated our magazines and website. He is also an avid walker and has trekked to Everest Base Camp not once but twice.

We will miss Paul greatly and I hope you will join me in wishing him and his family a very happy retirement as they catch up on the travels that have been so thoroughly curtailed over two years of Covid-19. Here's to the future, Paul!





# Let's walk. Let's talk.

It's been described as the "new active alternative to indoor business networking" - and CPRE Kent wanted some of the netwalking action, as **Julie Davies** relates.

As we reflect on getting back to 'normal' life, I'm sure one of your memories of lockdown will be how grateful we all were to be able to get outdoors and enjoy the countryside.

I don't need to extol the virtues of the countryside to you and the documented benefits of being outdoors - whether it's being in your own garden, local park or the wider countryside; and whether it's for the purposes of gardening, admiring the view, walking or running.

As the countryside charity, CPRE Kent is keen to be at the forefront of championing such benefits - and we sought the help of members (and others).

We began trailing the idea of 'netwalking' events in the run-up to Christmas last year, starting in the home of our Pink Wellies: Will Walk blog, which featured a diary of lockdown walks from Faversham, and are looking to develop them in the year ahead.

Our walks take place on the last Friday of the month - moving each month to a different area of the county - and if you'd like to suggest a 3.5-mile walk in your area, please do get in touch by emailing us at [info@cprekent.org.uk](mailto:info@cprekent.org.uk)

## Weald of Kent Ploughing Match

**Saturday 17th September 2022**  
New Barn Farm, New Barn Road, Hawkenbury, Tonbridge, TN12 0ED

**Attractions throughout the day:**

- 9 Modern & Vintage Ploughing Classes
- Horse Ploughing
- Gymkhana
- Fun Dog Show
- Trade Show
- Terrier Racing
- Steam Ploughing
- Dog Agility Competition
- Hound Parades
- Birds of Prey Flying Display
- Tossing-the-sheaf Competition
- Farmers' Market
- Clay Pigeon Shooting

[www.wkpm.co.uk](http://www.wkpm.co.uk)

Sponsored by: **KRESTON REEVES**

## AgriSouth

**30 JUNE 2022**  
at Faversham Showground, Kent ME13 9SY

[www.agri-south.co.uk](http://www.agri-south.co.uk)

Join farmers, agronomists and other industry professionals for the South East agricultural sector's leading technical arable event.



# Why?

## join CPRE Kent

CPRE Kent is the only charity that fights for the wider countryside in our county. We don't just battle to protect trees, birds, wildlife or open spaces - we seek to protect the countryside itself.

Without the wider rural environment that we hold so dear, not only do we lose our nature but also what makes Kent special.

No one has fought harder for the countryside with its people, villages and wildlife than CPRE Kent. We are now into our 10th decade - we could of course not have lasted that long without our supporters, but similarly we have proved our right to be here through the passion, care and professional expertise of our staff and volunteers.

No one knows the crazy levels of pressure from urban sprawl weighing upon Kent as much as the people who live here - and suffice to say all who represent or work for this organisation live within its borders.

We want to bring people together in connecting with the nature in our downs, woods, marshes, farms and coastline with which we are blessed... we still have much to celebrate.

Nationally, CPRE, the countryside charity, has been engaged at the highest level in consultations on

proposed changes to the planning system that could have been disastrous for our rural environment.

And over the past 18 months or so, there has been some softening of those proposals. Stark 'top-down' housing targets that would have concentrated housebuilding in our region have been altered in favour of a greater emphasis on urban regeneration.

CPRE was not alone in challenging the initial proposals, but we played a full and important part - as ever, our charity's combination of local and national knowledge proved its strength.

While CPRE Kent is far from opposed to all development or to all change, there are cases where we believe we have a duty to challenge what is profoundly wrong.

Sometimes that duty drives us to seek protection for the countryside through court; it is an expensive option and one taken only as a last resort, but if we don't do it, who else will?

CPRE Kent leads the fight for our beautiful county in a way no one else can, holding developers and the people that represent you to account. Please join us - as together we are stronger.

Write to us at: CPRE Kent, Queen's Head House,  
Ashford Road, Charing, Ashford, Kent TN27 0AD

email [info@cprekent.org.uk](mailto:info@cprekent.org.uk)  
or phone us on 01233 714540





# Action stations!







**They came from Cliffe, they came from Eccles, they came from Tunbridge Wells, they came from Folkestone, they came from Thanet... north, south, east and west, they came from across the county to join Kent's Day of Action.**

More than 1,000 people gathered on Sunday, November 28, for the Save Kent's Green Spaces protest organised by Dave Lovell. All were expressing their anger and upset over the loss of so much countryside to development.

The turnout of more than 30 groups on a biting cold day was an extraordinary result, especially given the short notice of the event.

Mr Lovell, who had been so involved with the Save Capel group, said: "At least 30 groups came out, some of them joining up together. Most sent us photos and many of these have placed in a digital photo album."

Highlighting the staggering onslaught facing Kent in the coming years, Mr Lovell said: "We estimated 18,000 acres in the county are under threat of development - that's an area larger than Manhattan Island - before we stopped counting as we couldn't keep track. However, we know that's nowhere near the true figure and that is scary. It's the tip of the iceberg

"The figures don't cover just housing - they include solar farms, for example. And there's the concern that those solar farms are the thin end of the wedge, paving the way for housing that will theoretically get its power from them. They can be a trigger for further development, which is

happening around Capel [near Tunbridge Wells]."

Many will concur wholeheartedly with Mr Lovell's view that "there is a huge scale of destruction coming like nothing we've seen before".

"This counting of the destruction of countryside is not being done by councils - no one is actually counting how much is being lost," he added.

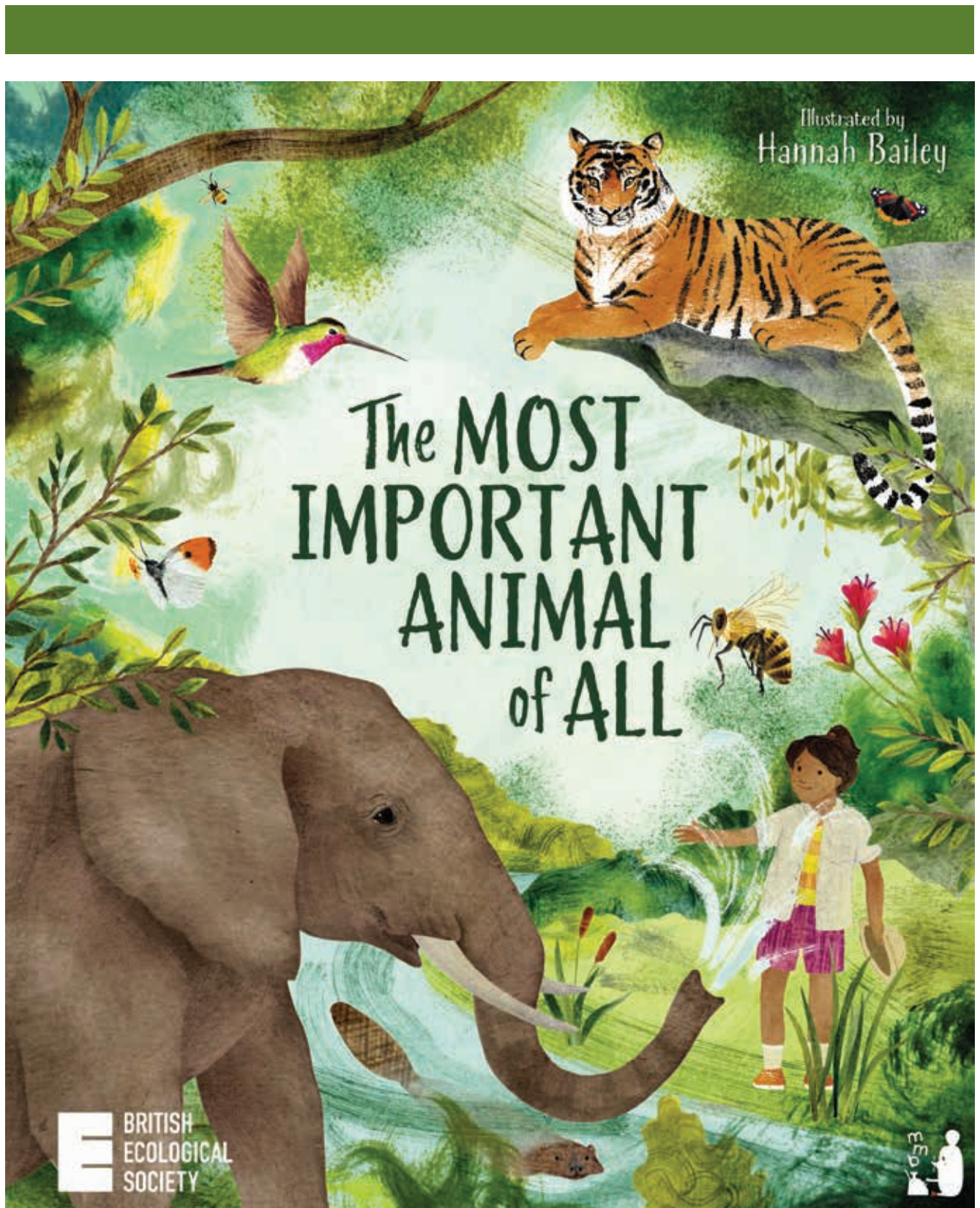
He was understandably delighted that so many people came out: "It was a fantastic response. Anyone can put 'likes' or emojis on social media - it's much harder to get feet on the ground.

"When we started this, we had no idea what the response would be. But on the day itself we were sitting in the pub after our walk and the phones were going ballistic as the pictures came in. Then we had an idea of what we had achieved."

Since the day of action, there have been further peaceful marches in Faversham, Canterbury and Tenterden, while a letter asking for a reworking of policy and "an immediate halt to Local Plans that focus on greenfield loss" has been presented to Michael Gove, Secretary of State for Housing, Communities and Local Government.

Written under the umbrella of Save Kent's Green Spaces and signed by a range of groups, including CPRE Kent, it focused on the Day of Action and the response of MPs in the county, eight of whom have expressed their support of the concerns raised. ■





Kent author **Penny Worms** has put together a delightful book that offers children and adults alike an insight into the ecological connectivity of the world around us - it's also designed to get us thinking

# The most important question of all?



Its title seems to brook no argument, but Penny Worms's book **The Most Important Animal of All** poses what is in effect a question that is entirely, and deliberately, open to debate.

It is one of author Penny's "star titles" and comes after 30 years of working as an editor and writer. With much of her writing work being commissioned and the role of editor being "almost like a producer putting the team together", Penny - originally from Maidstone but now living in Tunbridge Wells - felt it was time to focus more on her own ideas.

And so, among others, *The Most Important Animal of All* was born. It tells how on the first day of term seven children are asked by a teacher to champion their chosen animal for the No 1 spot. At the end of term, the class is to decide which is, well, the most important of them all...

Early inspiration had come from the Earthwatch 'Irreplaceable' debate at the Royal Geographical Society in which five scientists competed for audience votes on which was the most invaluable species (bees won).

Of course, Penny's commissioning experience came in useful and artist Hannah Bailey was brought in to provide the illustrations; the pair "worked together very closely after that".

Despite being "massively interested" and wanting to "go and sit in a hide to learn about birds", Penny is not an ecologist so pulled in Alex Morss, who is and who went through the transcript before it was sent to the British Ecological Society, where a team scrutinised it yet further.

"Luckily, the BES loved it and endorsed it," said Penny, who in *The Most Important Animal of All* has written a children's book that also offers plenty for folk of an older vintage to consume.

"There's loads for adults to learn - that was one of the reasons I chose the animals I did. Each animal has its own ecological insight - bats, for example, are often demonised as a source of disease, but they perform an invaluable service for the wider environment.

"The selection also gave Hannah a range of diverse landscapes to work with. The book is definitely cross-generational. That's why children's books are brilliant - I love what some publishers are putting out there, taking us back to basics."

So what, in the longer term, was Penny hoping to achieve with the book?

"There's so much climate anxiety in children, I wanted to do something positive and explain why keystone species are so important for the environment," she said.

"It's about caring and growing up with the belief that all species are important and being aware of the need to do something to help. It's an informative book that is both insightful and inspirational. It had children thinking critically.

"It's gone down so well in schools. There's a project in Yorkshire where eight schools are coming together to study the book and debate which is the most important animal - there will be about 300 youngsters joining the debate.

"I suppose this is my vision coming to life." ■

• **The Most Important Animal of All** is available from bookshops and online retailers, but if you would like to buy a copy (or several!), use the code CPRE on Penny's website [www.mamamakesbooks.com](http://www.mamamakesbooks.com) and £1 per copy will be donated to CPRE Kent.



# Doing archaeology better

Unearthing and recording our hidden past can be one of the many aspects to be addressed in considering planning applications, but are technological developments not being taken advantage of or even understood? **CPRE Kent's Ashford committee** has been investigating.



Archaeological digs caused substantial delays at this development site in Appledore

Our past, it could be argued, is of as much importance as our present and our future. For those of us involved in the conservation of the county's historical, cultural and natural heritage, it is perhaps ironic that much of the knowledge of our medieval and prehistory is unearthed during development schemes.

While rural campaigners might despair at the loss of yet more countryside, such projects can excite archaeologists, whereas developers often engage with search processes with only limited enthusiasm as they face potential time delays and high survey costs.

Developers' desk research can be useful but miss areas of archaeological potential - the 'white space' on the all-important Kent Historic Environment Record (HER) might simply be the result of a lack of looking.

Taken in its entirety, it's not a satisfactory situation and CPRE Kent's Ashford committee has been focusing on the subject, exploring whether contemporary scanning technology could enhance archaeological search without the need for excessive digging.

The committee found that scanning technology is little used by developers' archaeological consultants - utility companies, on the other hand, have embraced the process more enthusiastically. It's a surprising conclusion given the amount of time and of course money that could be saved through use of the 'smarter' geophysical technology. Indeed, so time-consuming and expensive can the archaeological process be that a development might be shelved altogether.

Even when a scheme is built out, the time lost can be striking. At Appledore, for example, a planning application



Large, vehicle-mounted systems can cover wide areas quickly (Drilline)



for four houses was registered in June 2017 and granted permission in May 2019, when an archaeological dig caused a delay of almost 12 months. The land was then sold to another developer, which submitted a further planning application and secured permission for five houses and a revised layout. This was registered in July 2020 and granted permission in December the same year, resulting in another archaeological dig causing more delay - the development is expected to be completed by the middle of this year, while the report and findings of the archaeological consultant have yet to be seen.

If we are to speed things up, one of the most promising forms of new technology is Ground Penetration Radar (GPR) and the Ashford committee learnt about it during a presentation by Matthew Bunting, managing director of Drilline Solutions, the first company in the UK to sell GPR gear commercially. He belongs to the Chartered Institution of Civil Surveying Engineers, which is promoting the use of GPR and trenchless technology.

GPR does not eliminate the need for digging (or 'trenching') but reduces how much is necessary and speeds up the development process. Cost ranges from £10,000 to £150,000, but the equipment suitable for archaeological purposes should not exceed £20,000 in price - an outlay that could pay for itself relatively quickly and be useable for at least a decade.

Although the potential for archaeological use is clear, GPR has been used largely for utility mapping, for example at Gatwick airport. In road engineering, it can determine asphalt thickness or degradation, while on the railways it

has been used to detect moisture and clay in ballast and whether there is potentially dangerous movement from the washing away of clay.

Various systems are used:

- Entry-level: used on most sites, with a dual-frequency radar that has a low and a high frequency, this can go two or three metres deep. Pushed by hand, it can be connected to GPS and plot where everything is in real time.
- Stream-C: a larger system and single-frequency at 600 MHz. Useful for archaeological digs as it has 32 antennae, giving excellent resolution.
- For small objects in shallow ground: a hand-held device that operates at 2GHz and can pinpoint individual layering of ground. Generally used for concrete but can help analyse the first 80cm of ground.
- Large, vehicle-mounted system: can cover a large area quickly and is dual-frequency, running at 200 MHz and 600 MHz. Recently deployed in the building of a bypass in Staffordshire, where it is being used to locate utilities and archaeological remains. Surveys can be done quickly at speeds up to 50mph

GPR can identify soil disturbance, so if soil is replaced after a hole has been dug that can be detected. Resulting images are called B-scans ('brightness scans').

Another advantage of GPR is that it can be used to show where digging should be focused: the 'test windows'. Although this is rarely done in the UK due to the expense and the fact equipment is often outdated, in truth an outlay of say ▶



£15,000 is not overly substantial when the cost of building a housing estate is considered - further, as well as finding archaeological remains, it can help avoid utilities and voids. A lot of money is spent repairing utilities after holes have been dug in the wrong place, while there is also the cost of resultant fines.

If not in the UK, the merits of such geophysical methods are appreciated in Norway, where any development - even a house extension - requires a GPR survey.

Other companies, including for example, GSSI and MALA, sell GPR equipment. GSSI is the preferred option for archaeologists as it goes down to a low frequency, while MALA is a low-cost solution used commonly on construction sites but infrequently in an archaeological or planning context.

Indeed, the archaeological world has been slow to embrace the use of GPR, perhaps because it doesn't allow any remains found to be dated or have their significance verified. Dating is naturally a critical aspect for archaeologists, so a combination of trenching and geophysical technology is probably the way forward.

It is an issue close to the heart of Wendy Rogers, a senior archaeologist with the county council's heritage team who acknowledges both the opportunity that development presents and the need to move with the times.

In a separate address to the Ashford committee, Ms Rogers said that, given context, she was keen to see GPR used. In planning, so much is dictated by time and resources, but if there is time on larger sites geophysical surveying can be requested, especially as the process is now becoming markedly cheaper.

There are two approaches when talking to a developer or contractor: one is when there is already an idea of what might be found, while the other is going in 'blind' to see what might be discovered.

Roman building material might be evident on a site, so a team will study aerial photographs to see if there are signs of a Roman building. There could be a recommendation for a geophysical survey, while there might possibly also be metal-detecting finds.

Other resources include old Ordnance Survey maps and knowledge of geology and land use. An analysis of what is known about the site both in terms of archaeology and the type of proposed development will help guide what work, if any, is necessary if it is believed something of interest is present.

The National Planning Policy Framework stresses the word 'potential' in relation to archaeological remains, so that can be enough to trigger a search.

GPR is useful, said Ms Rogers, but it is unable to date finds or verify significance. It might highlight an anomaly, but it cannot tell if it is Roman or recent.

If the process were free and without time restraints, her team would ask for GPR on all relevant greenfield sites, but as this is not the case the easiest method to find anything of archaeological significance on a greenfield or industrial site is trenching.

Trenches measure 20 x 1.5 metres and are dug over 5 per cent of a development site, giving enough evidence of

remains of significance. If a geophysical survey is carried out, trenches will be targeted on any anomalies. Trenching will always be necessary to clarify date, function and significance, which is what is wanted in the NPPF, said Ms Rogers. GPR is rarely able to determine the significance of archaeological discoveries.

Developers tend to be highly restrictive with archaeological costs that are not part of their scheme and are obviously keen to ensure profit margins make it viable. With the need for other work such as ecological surveys, they are not inclined to fund archaeological work before planning consent has been granted, so the minimum spend, in the form of trenching, will be assigned. Once consent has been granted, however, developers are often happier to allow the necessary time and funds.

While some might lament a perceived reluctance to adopt new technology, there is nevertheless regular updating of techniques among archaeological contractors.

Drones are increasingly used to take aerial shots for excavations and Light Detection and Ranging (LiDAR). The Environment Agency's LiDAR is accessible on its website but not of high enough resolution for archaeological assessment of landscape issues - it is, though, sometimes used for larger Heritage Lottery Fund projects.

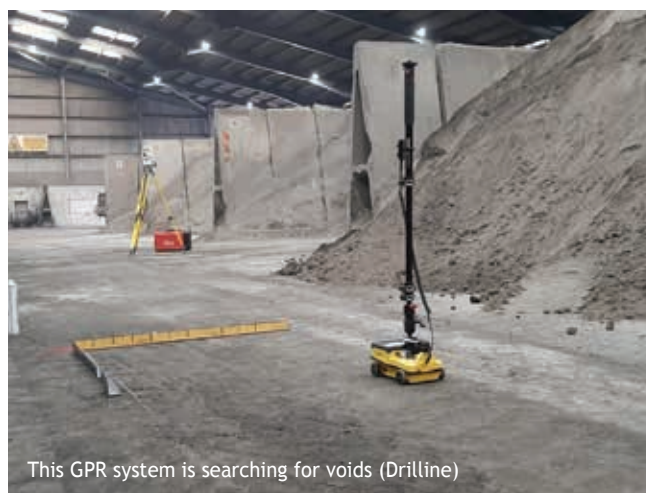
Happily, some techniques are becoming substantially cheaper, while their variety is increasing: aside from GPR, we have the magnetometer, resistivity (which can detect stone walls) and magnetic susceptibility, which can highlight clusters of activity.

In short, an open mind and willingness to adopt an attitude of trial and error have never offered so much potential.

While it is clearly right and proper to know what has happened in the past, some in the Ashford committee question whether present archaeological practices are out of balance and slightly indulgent or indeed if the cost and delays are affordable and justified.

Like it or not, we have to accept change and in a sense perhaps the best way we can do that is to look back. Archaeology helps us in that regard - we just need to do it better. ■

**In the next edition of Kent Countryside Voice, we will examine the wider role of archaeology in the planning system.**



This GPR system is searching for voids (Drilline)



**One of the perks of CPRE membership is reduced admission to some of England's finest gardens, historic houses and attractions.**

# Franciscan Gardens Canterbury



**Escape the bustle of Canterbury city centre and relax in the recently replanted Franciscan Gardens.**

Inspired by the site's original use as a Franciscan friary, here is a hidden gem of symbolic planting, peaceful paths and the beautiful Greyfriars Chapel. Walk in the footsteps of the first Franciscans in England and enjoy this place of contemplation and tranquility beside the Great Stour River.

#### **Discover medieval horticulture**

Take a reflective journey through the garden, which reinterprets the former monastic way of life and successive horticultural legacies. You can take a seat and relax for a moment in the picturesque wildflower meadow, dotted with heritage fruit trees.

First planted in 2000, the garden is growing and maturing, with new features being added and planting continuing.

**CPRE members are entitled to two-for-one admission (not available online).**

The Franciscan Gardens are open six days a week (closed Tuesdays) from 10am-4.30pm. More details at [www.franciscangardens.org.uk](http://www.franciscangardens.org.uk) or email [enquiries@franciscangardens.org.uk](mailto:enquiries@franciscangardens.org.uk)



Save the  
date!

You can join us on a CPRE Kent trip to the Franciscan Gardens on Saturday, June 11. Meeting at 10am, we will have a tour of the gardens and then enjoy lunch at The Weavers.

Numbers are limited to 25, so booking is essential. Email [info@cprekent.org.uk](mailto:info@cprekent.org.uk) or fill in the flyer with this magazine.



# 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 current Local Development Scheme (May 2021) sets out that Regulation 19 consultation on a new Local Plan was supposed to have taken place at the end of last year. This timetable is to be updated.

## **Canterbury**

- Regulation 18 consultation (preferred option) took place last summer. Regulation 19 consultation is expected to take place at the end of 2022. It is anticipated the examination hearings will take place in summer 2023, with adoption by the end of that year.

## **Dartford**

- Regulation 19 consultation took place on a second pre-submission version of the Local Plan last autumn - the Plan was republished to take account of Natural England's notification of the Swanscombe peninsula as an SSSI. The plan was submitted for examination on December 13, 2021

## **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 NNR (water quality) mean this has been delayed. The LDS is to be updated.

## **Folkestone & Hythe**

- Following the examination hearings, there has been a period of consultation on proposed main modifications to the Core Strategy Review. The inspectors' final report is awaited, with adoption to follow shortly afterwards.

## **Gravesham**

- Regulation 19 consultation did not take place, as planned, last autumn - the council is awaiting National Highways/KCC with regard to highways modelling.

## **Maidstone**

- Regulation 19 consultation took place at the end of last year. Examination hearings are expected to take place this summer, with adoption in January 2023.

## **Medway**

- Regulation 19 consultation was intended to take place in October 2021 but did not take place. The plan has since been scrutinised by counsel and the Planning Advisory Service (PAS). Consultation dates are awaited.

## **Sevenoaks**

- Regulation 18 consultation is due to take place in April-May this year, with Regulation 19 consultation at the end of the year and examination in summer 2023.

## **Swale**

- Regulation 19 consultation took place last spring, with an additional Regulation 18 consultation last autumn. Further consultation is due to take place this spring, with examination hearings in the summer. Adoption is expected by February 2023.



**Thanet**

- Regulation 18 consultation took place at the beginning of this year. Consultation on a draft Local Plan will take place at the end of this year, with adoption in 2024.

**Tonbridge and Malling: Regulation**

- 18 consultation is expected to take place this spring-summer, with Regulation 19 consultation at the end of the year. The Plan is expected to be adopted by autumn 2024.

**Tunbridge Wells**

- The council’s Local Plan was submitted on November 1, 2021. Examination hearings will take place from February-May this year.

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

**KEY**

- Regulation 18
- Regulation 19
- EIP
- 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.

# Around the districts

**A quick catch-up with our committees - more extensive reports from our chairmen are on the website. Don't forget, if you would like to become more involved with CPRE Kent in your local area please contact us in the office and we will put you in touch with your district chairman.**

## Dartford and Gravesham - Alex Hills

- We celebrated the designation of the enlarged Swanscombe Peninsula Site of Special Scientific Interest. However, the application to build the London Resort theme park on the peninsula has not been withdrawn, so the fight goes on. It is disappointing that the developer is still trying to defend the indefensible - it is important that the peninsula is protected for future generations as it is an oasis in a concrete jungle. CPRE Kent has been campaigning with Save Swanscombe Peninsula, Buglife, Kent Wildlife Trust and the RSPB against development of the theme park and we were delighted at the decision by BBC Studios and ITV Studios to withdraw their support for the scheme. We have been calling on Paramount Entertainment to similarly publicly sever ties. After delays and uncertainty caused by developer LRCH asking for more time to address both transport issues and the peninsula's SSSI designation - together with its failure to produce necessary documents and concerns that it had not consulted enough parties in preparing submissions - we now have a date for the preliminary hearing in the examination of the Development Consent Order application. A letter from Rynd Smith, lead panel member for the Planning Inspectorate's examining authority, announced in February that the meeting would be held virtually on March 29-30, with reserve dates of April 5-6, should they be required. Natural England's expansion of the SSSI has resulted in some 450 houses now not being built in Ebbsfleet Valley. However, there are some 1,500 new houses planned for areas currently serving as car parks. It is important that developments near SSSIs are not allowed to damage them through light pollution. This is why we helped promote the CPRE Star Count as it provides the evidence we need to campaign effectively. Many people do not understand how important darkness is to the environment, human health and human safety. Floodlighting everything at night really does not make us, or our property, any safer, which is a tough message to get across. Sadly, our planned Dark Skies Event at Swanscombe had to be cancelled because of poor weather.
- In February and March, National Highways held Lower Thames Crossing drop-in events, at which we continued to oppose the scheme, as all it would do is increase congestion, increase air pollution, destroy our countryside and bring misery to many. The government is looking to spend £8.6 billion on a scheme that will not resolve congestion at the Dartford Crossing. We believe government could spend the same money solving the problems at the crossing in a more environmentally friendly way.

## Dover - Derek Wanstall

- It has been fairly quiet in the district, with the council's new head of planning still not in post.
- There are ongoing problems with the large Persimmon site in Deal, plus details on another site are awaiting clarification after an approval with incorrect information on the planning notice.
- Work has started at Guston on the Customs lorry-holding and checking facility.
- Roads such as the A256 are getting busier, with frequent hold-ups, some of them due to new cycle regulations.
- Gales have brought trees down on to power lines - perhaps there should be regulations helping to avert this problem, such as regular checks to ensure owners crown their trees close to power lines.

## Maidstone - Henny Shotter

- A planning system not fit for purpose:
  - i Free-range-chicken farm with three hen houses, each being able to house 64,000 chickens at a time. The site is a field containing ponds and borders the River Beult, an SSSI and ancient woodland (20/505751/EIFUL).
  - ii A housing development of 1,725 dwellings at Binbury Park, Detling, in the Area of Outstanding Natural Beauty (18/504836/EIOUT).
  - iii Six tourist lodges metres from the M20, adjoining a site of high nature conservation value, with effluent going (after a cleaning process) directly into the River Len (20/503651/FULL).
 You might wonder what these planning proposals have in common besides being in Maidstone district. They are all proposals for development in the



wrong places in which conditions are used to make the application more 'sustainable'.

We believe there are certain areas that should be sacrosanct and planning applications that don't respect this should be refused very swiftly. The AONB is one such area, as are SSSIs and rivers, which are at risk of eutrophication.

Chicken farm: In January 2021 we, together with many other individuals and organisations, objected to the application for a chicken farm on this very sensitive site. One year on, the application is still going strong after the applicant agreed to create a buffer zone of 25 metres towards the Beult and plant 36,000 trees. Now the Environment Agency does not object anymore! The footpath officer is under pressure to give up his objection to the diversion of a footpath that would increase the route from 1,010 metres to 2,140 metres. The application comprises 662 documents and the story isn't finished yet.

Housing development of 1,725 dwellings in the AONB: This application was validated on September 9, 2018. Three and a half years on, the application is still alive, now comprising 445 documents! Although the site was not considered in the Local Plan review, Maidstone Borough Council has not drawn a line under the application process, taking up precious time and resources.

Tourist lodges near the River Len: A previous application had been turned down by an inspector. CPRE objected to this development in August 2020 because we were concerned about ammonia and nitrates reaching the Len in effluent from the development. A new application was made in April 2021 and approved by MBC after placing conditions on the scheme. Now, one year on, the developer has launched an appeal against the planning conditions! The planning system leaves many residents angry and disenchanting with local and national government. It is counterproductive to the principle of democracy, which needs engaged citizens. This system is also very costly in monetary terms for developers and councils. However, these costs are eventually paid by the new homeowner, the taxpayer or the customer. Nobody is served well.

- Almost three years after plans for the Heathlands development at Lenham parish were first raised, and after Regulation 19 consultation, MBC held a public engagement event. MBC considered it a security risk to bring the event to Lenham and it was to take place in the Great Danes Hotel at Hollingbourne. Finally, two consultation events were held at the Great Danes (for which people had to register), one on Zoom and one in Lenham. There was very short notice given of the event and many residents might have missed it altogether - is this democracy at work? The action group Save Our Heath Lands (SOHL) has called for the resignation of the council's leadership over this mishandling of the consultation process.

## Sevenoaks - Nigel Britten

- We all know that more houses - of the right kind and price - are needed in the district, but the actual number, determined by a government formula, is vastly higher than anything achieved in the past. It's clear this will put great pressure on the Green Belt, which covers all the Sevenoaks countryside. It was therefore great news that the appeal against the council's refusal of the 800-house development on the former Broke Hill golf course was dismissed, particularly because the inspector said protection of the Green Belt took precedence over other considerations.
- In the autumn we reported that the Chevening Estate had failed to get permission for works including the creation of mounds up to 12 metres high as a protective screen, though the M25 is not visible from the house itself. That would require some 150,000 highly polluting lorry movements over more than five years - in our view simply unjustifiable in the context of the climate emergency. We have just heard that an appeal has been lodged, so we shall be taking our objections to a public inquiry in due course.
- The next Local Plan could still be up to two years away. The district council is updating the evidence to support the Plan's policies and it has completed two 'calls for sites' for landowners to put forward sites for development. Ominously, the second stage of that process concerned exclusively Green Belt sites. Unlike Broke Hill, which was in open countryside, sites bordering the district's larger settlements are likely to be the focus.
- Coming to an open field near you? A little-known permitted development right has just allowed the conversion of two steel wrecks of former barns near Knockholt into an aparthotel in a field without an established access.
- Our committee is still looking for a meetings and minutes secretary to relieve our present and very long-serving secretary, Dr Susan Pittman, after almost 30 years in the job. Needless to say, new committee members would also be extremely welcome.

## Thanet - David Morrish

- Thanks to hard work by CPRE Kent planner Richard Thompson, we have prepared a joint (Kent and Thanet) submission to Thanet District Council planners about the forthcoming Local Plan work. Our primary concerns are
  - i Overblown population forecasts
  - ii Obsession with a 1930s-style private-car network and absence of consideration of public transport
  - iii Neglect of brownfield sites from consideration and the absence of a brownfield register as justification for building on greenfield sites
  - iv Lack of future-proofed housing standards
  - v Absence of formal engagement strategies with voluntary bodies such as CPRE Kent and civic societies
  - vi No decision on Manston airfield
 This time, compared with 2014, we have ensured all bases are covered so as the draft Local Plan develops we can point to all our arguments and cross-reference them to these original commentaries.
- We submitted a statement of support for Thanet District Council to the inspector leading the inquiry into an appeal by land agent Gladman against refusal of its plan for 450 properties at Shottendane Road, Margate, on the grounds of insufficient affordable housing. Councillors had resolved to put aside officers' recommendation to allow a cut in the 30 per cent 'affordables' figure set out in the Local Plan. The hearing was held in camera over four days and it was apparent that affordable or social housing was not favoured by Gladman's anticipated customer base. The council hired an independent planning

consultant well versed in the needs of Thanet social housing and who did a sterling job in presenting the case that council officers should have produced in the first place.

Sadly, the inspector upheld the Gladman appeal. His reasoning was: "16. The Council's statement of case noted that its appointed viability consultants, the Dixon Searle Partnership (DSP), found the submitted approach to assessing viability to be appropriate, including values, costs and the outputs which resulted from the assumptions provided. However, in the light of the evidence from Mr Hestor for the Council on buildings costs, I consider that the 15 year sample used for the Kent based building costs, involving a range of 257 schemes, is likely to provide a more robust and reliable figure than a five year sample consisting of only 15 schemes. The Kent based costs would still provide for evidence of reasonable local market conditions. The use of the Thanet rate would also result in the likelihood of a situation where, despite building cost inflation, the costs would be assessed at a lower rate than previously was the case during the determination of the application. I therefore find the use of the Kent based building costs to be reasonable. 17. The developer's profit of 17.5% used in the appellant's assessment falls midway between the 15% to 20% range in the Planning Practice Guidance (PPG). The Thanet Local Plan and CIL Viability Assessment assumed a 20% developer's profit margin with further testing provided at 17.5%, but not any lower. The profit level is lower than the 20% developer's profit used and agreed for the Salmestone Development."

What an absurd, ungodly country we live in where developers' profit margins of 17.5 per cent are sacrosanct and a lost generation inherits homelessness in Thanet. Let's hope the new Local Plan can succeed in concentrating first and foremost on where affordable housing can be built.

## Tunbridge Wells - Margaret Borland

- The Tunbridge Wells Local Plan Examination in Public started on March 1, with two days of Stage 1 hearings looking at legal compliance. Since the Issues and Options Consultation in 2017 we have consistently objected to key parts of the council's strategy. When almost 70 per cent of the borough is Area of Outstanding Natural Beauty and 22 per cent is Green Belt, we do not believe it is realistic to meet in full the government's Objectively Assessed Need, nor that this approach will provide the truly affordable housing needed across the borough. Additionally, housing densities on many allocated sites are low, failing to protect greenfield sites from unnecessary development. The Stage 2 hearing sessions were scheduled to start in the final week of March.
- The 'day job' of commenting on planning applications continues. Unsurprisingly, a number of developers, whose proposals for developments were not included in the Submission Local Plan, have taken the opportunity to submit planning applications, highlighting the lack of a five-year housing supply. We are also seeing a regular flow of appeals against the council's refusals of planning permission, again citing the presumption of sustainable development.
- Our good news is that an application for almost 400 homes, a care home and relief road at Hawkhurst Golf Club, within the High Weald AONB, was dismissed at appeal at the start of February. Further details of this can be found on the CPRE Kent website (search 'Hawkhurst').

## Historic Buildings - John Wotton

- The committee met in October and January (for our AGM). In March, Dr Susan Pittman arranged another fascinating visit for members of the committee, this time to Wood's Steam Traction Engine Foundry in Crockenhill. We found an Aladdin's Cave of 19th-century machinery, which operated commercially until 1990 and remains in Wood family ownership. It must be hoped that a means will be found of preserving for posterity this unique example of the industrial archaeology of Kent. Our next visit was scheduled for April, to Frognaal House.
- It has not yet proved possible to proceed with judging the work submitted by undergraduates at the Kent School of Architecture and Planning for the delayed Gravett Architectural Drawing Award 2020.
- 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. I am grateful to Stuart Page, a member of the committee, who appeared on behalf of CPRE Kent as an expert witness on heritage in the hearing of the called-in application to build a housing estate at Turnden, near Cranbrook. The Secretary of State's decision is awaited at the time of writing.
- We remain in need of new members, especially to cover Ashford, Gravesham, Maidstone and Tonbridge and Malling.



# 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  
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- **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 [info@cprekent.org.uk](mailto:info@cprekent.org.uk) Otherwise, do please feel free to patronise the above businesses... and you can drop in a few pennies while you're there.



Don't forget to keep up with our campaigns news on our website and via Facebook and Twitter @cprekent



## OUR VISION FOR PLANNING

JANUARY 2021

### 'A powerful and memorable campaign': CPRE wins award for response to planning proposal

Our organisation's combined national and local approach bore fruit as the failings of the Planning White Paper were exposed.

CPRE, the countryside charity, broke new ground when it won an award for a campaign responding to the government's proposed reform of the country's planning system.

Our organisation's first award for campaigning and policy work in living memory was announced in November last year and represented a striking triumph for the combined national and local approach of CPRE.

The annual PRCA Public Affairs Awards recognise the finest organisations and individuals operating in public affairs. Clarifying why CPRE beat other big names such as Transport for London in our category, the judges said: "This was a powerful and memorable campaign, which received solid support and strong messaging and ultimately exposed the failings of the Planning White Paper - and certainly did get the government to think again."

CPRE had asked that the government rethink substantial elements of its contentious planning proposals and work with stakeholders to deliver a planning system that put people, climate and nature at its heart.

The call from CPRE was made as part of a broad coalition of 18 environmental, housing, planning, transport, heritage and public-health organisations that worked together to forge their own alternative 'Vision for Planning' in response to the government's Planning White Paper, published in August last year.

As ever, the efforts of people at every level of CPRE have been highlighted. We can't do it without our supporters - if you're one of them, thank you!

## Events 2022

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

Farm Expo, Detling  
Wednesday, March 2

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, Pluckley  
September, date TBC

EKPM, Little Mongeham  
Wednesday, September 28

Whitstable car park  
TBC

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](mailto:vicky.ellis@cprekent.org.uk)



# From the Frontline

Hilary Newport with the campaigns update



## Garden cities

**The future of the planning system - reported here in many, many earlier editions - remains unclear. We believe we have helped turn the groundswell of policy away from building ever-more-expensive houses in ever-more-unaffordable parts of the country towards a more nuanced 'levelling up' approach that distinguishes between genuine housing need (which is finite and can be measured) and artificial housing demand (which is limitless, while there are still people with deep pockets looking for something in which to invest).**

Nevertheless, until we see the contents of the expected Levelling Up Bill later this year, we continue to operate with a planning system that requires local planning authorities to set unachievable housebuilding targets and then penalises them when the market fails to deliver those houses.

This appears to be why so many of our district planning authorities in Kent are still pressing ahead with their plans for so-called 'garden towns', which in the main are sited on greenfield sites in rural areas without adequate opportunities for active travel or public transport.

Otterpool is likely to remain the frontrunner within Kent, as it might soon become part of the adopted Local Plan for the district, but Maidstone Borough Council appears to remain intent on its plans for a Lenham 'garden community' in a hugely inappropriate and damaging location.

We hope that pressure to deliver these unsustainable development hubs will soon become a thing of the past.

## Biodiversity Net Gain

**Biodiversity Net Gain (BNG) is a new approach that intends to leave sites in a better condition after development than before: this means increasing appropriate natural habitats so that the decline in native species can be halted and ecological networks restored.**

It is a product of the 2021 Environment Act and makes developers responsible for delivering a 10 per cent improvement to the biodiversity value of any application site.

In principle, this is to be applauded. With only 53 per cent of its biodiversity still intact, the UK is in the bottom 10 per cent of countries globally.

In practice, as ever, the devil is in the detail. The ways in which biodiversity is to be measured before and after are the subject

of much debate, and the fear is that BNG might become seen as an excuse to destroy habitats on the edge of built areas on the basis that the lost habitats - and the biodiversity they are home to - can simply be replaced elsewhere.

CPRE Kent, led by Vicky Ellis, is making a major contribution to the national CPRE response to Defra's consultation. A lot depends on getting this right; developers are obliged to maintain areas of new biodiversity for a minimum of 30 years, but while local authorities struggle to enforce their current planning enforcement duties, who will be able to hold these promises to account?

## JNCC 7th Quinquennial Review

**CPRE Kent is joining 30 other conservation groups (including Froglife, RSPCA, RSPB, People's Trust for Endangered Species, The Wildlife Trusts, Zoological Society of London and the Amphibian and Reptile Groups of UK) in signing an open letter opposing a review of the Wildlife and Countryside Act 1981 that could undermine decades of work to restore and protect threatened species.**

Every five years, species listed in Schedules 5 and 8 of the Act are reviewed through a process called the Quinquennial Review (QQR), coordinated by the UK Joint Nature Conservation Committee (JNCC).

Many species are listed because conservation experts have recommended their inclusion due to either persecution, population decline or other threats.

This year, in a change to the normal process, the Review Group (JNCC, Natural England, Natural Resources Wales, NatureScot and representatives of the non-governmental sector) has changed the eligibility criteria of species currently (and in future times) listed and afforded protection by the Act.

This change means that an animal or plant species will only be protected when it is in imminent danger of extinction as defined by the highest categories in the IUCN Red Listing process, or those identified as European Protected Species. This decision has been made without due consultation and, to date, has not considered concerns raised by conservation groups.

A range of species will now no longer be protected against killing and sale by law, including previously persecuted species such as mountain hares and adders.

Now, the consortium of 30 conservation NGOs has written an open letter to the Review Group in opposition to this proposed change, as many endangered species, from red squirrels to water voles, could be at serious risk if the proposed changes are granted.





# 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](mailto:info@cprekent.org.uk);

or phone us on 01233 714540.



**Buy from us**  
Insect hotels, bird boxes and  
welly-boot planters!

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](mailto: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:

### October 21

Rev & Mrs Morris £50  
Mr L Wallace £30  
Mr P Stevens £20  
Mrs G Scales £10

### November 21

Mr D Le Breton £50  
Mr T Mansfield £30  
Mr A Joyce £20  
Mr & Mrs Harvey £10

### December 21

Mr J Gandon £150  
Mrs P Pollock £100  
Mr S Winn £50  
Mrs A Hone £50

### January 22

Mr & Mrs Harvey £50  
Lady Akenhead £30  
Mrs C Sales £20  
Mr D Gardner £10

### February 22

Mrs M Loveday £50  
Mrs M McFarlane £30  
Mr J Davey £20  
Mr R Love £10

### March 22

Mrs A Ellett £50  
Mrs L Dowding £30  
Mr L Wallace £20  
Mr C Catt £10

CPRE Kent (the Kent Branch of the Campaign to Protect Rural England) is a company limited by guarantee registered in England, number 4335730, registered charity number 1092012.

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