

Autumn-Winter 2023/24

# Kent Countryside *Voice*

Water: it's a dirty business

All change!

Our chairman leaves the  
hot seat after five years

Everything in the  
garden city is rosy

... or not



The countryside charity  
Kent



The beauty of the brown hare is captured in Vicky Ellis's image, created with graphite  
Cover: Footsteps in the sand of Botany Bay (Kate Lake)

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GIFT OF MEMBERSHIP

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Hilary Newport

# Director's Report

**The determination shown by National Highways to press ahead with the Lower Thames Crossing, dubbed the biggest roadbuilding scheme in the UK since the M25, is beginning to look increasingly desperate.**

There is no doubt that the congestion, air pollution and unpredictable delays at the existing crossing - particularly on the roads leading to the northbound pair of tunnels - are unacceptable and need urgent attention. The existing crossing has a design capacity of 135,000 vehicles per day but regularly handles more than 180,000 a day.

In an attempt to address the problem at Dartford, the first consultations on the location for a new LTC began in 2013, focused on the need to reduce congestion at Dartford. Industry, commerce, local authorities and the public were invited to choose between options for the location of additional road capacity to supplement the increasingly congested existing tunnels and road bridge at Dartford.

After the initial round of consultation, Option B was discarded, largely on the grounds that it would inhibit further development of the Swanscombe peninsula (a location more recently granted the status of Site of Special Scientific Interest for its mosaic of varying habitats that support an astonishing array of wildlife). At the time there were emerging plans for a theme-park resort on the site, but these have subsequently foundered in the light of the SSSI designation.

Option A was discarded shortly afterwards, described as poor value for money, although this would have been the option that involved far less land-take than the final remaining option C.

Since then, the application has progressed remorselessly, with various refinements on Option C until the current application was accepted for examination under the

Nationally Significant Infrastructure Projects scheme (see box) in November 2022.

The formal examination of the application began in June 2023 and will follow a strict six-month timetable, after which the independent examiners appointed by the Inspectorate have a further six months to prepare their recommendations to the Secretary of State for Transport, who has the power to make the final decision.

The team at CPRE Kent have consistently objected to the construction of the Lower Thames Crossing in its current proposed location. Our objections recognise the frustration of those suffering ill-health from reduced air quality and the frustration of delays at the current crossing, but we are looking at the longer-term impacts of more roadbuilding on an extraordinary scale.

Studies have shown again and again that adding additional road capacity helps improve congestion and reduce journey times in the short term but in the longer term makes it substantially worse. The concept of 'induced traffic growth' has been well known for a long time. New road capacity is free-flowing at first, but as people and businesses grow used to the new options they begin to make changes in behaviour that accelerate the speed of growth in traffic, repeatedly bringing outcomes that were worse than the conditions they were intended to alleviate.

From the Newbury bypass to the congested mega-highways of Beijing, the concept of 'one more lane ought to fix it' has consistently proved to be flawed.



# Nationally Significant Infrastructure Projects - a beginner's guide

The Lower Thames Crossing is just one of several substantial planning applications in Kent that are being progressed through the NSIP route.

This process was introduced in 2008 and was intended to streamline the decision-making process for major infrastructure projects, making it fairer and faster for communities and applicants alike.

It means that projects that fall above a certain threshold - energy, transport, water and waste - can bypass normal local planning requirements and apply directly to the National Infrastructure Planning team at the Planning Inspectorate rather than to the local planning authority relevant to their area.

In practice, participation in an NSIP examination, while open to the public, is daunting and off-putting; if anything it is a step backwards for increased local democracy in major planning decisions.

Such a process inevitably favours the case of the applicants, who can afford expensive legal representation, unlike objectors who might still have compelling arguments to oppose the development.

Under the current NSIP regime, the success rate of NSIP applications is 94 per cent.

Indeed, in the years since the current project was first suggested, the operational outcome of the Lower Thames Crossing has morphed from alleviating congestion at Dartford to one of driving faster economic growth in north Kent and south Essex. Studies have shown that, should the crossing become operational in 2031 as suggested, the current Dartford crossings will still be over capacity and congestion and air pollution will remain the 'new normal' at Dartford.

We know that a move away from reliance on internal combustion engines will help bring down greenhouse-gas emissions from traffic, but particulate pollution is made worse by the shift to electric vehicles (heavier EVs result in greater wear on brakes and tyres, while there is ample evidence of the health risks of these nanoparticles).

So how do we solve the problems of the Dartford Crossing? Well, not overnight, of course, but what must happen, and quickly, is the recognition that stoking economic growth through the provision of more and better roads cannot be a long-term solution. In this crowded corner of the country, we will never build our way out of traffic congestion. We must instead support policy that takes a broader view of how people, and goods, need to travel.

The Climate Change Committee's 2023 Progress Report to Parliament made it clear that to meet targets on greenhouse emissions, only roads that move towards net zero, and get people out of cars rather than make life better or easier for motorists, should be allowed.

The fact that this project is promoted by National Highways in and of itself speaks volumes. National Highways is the government-owned, arm's-length company delivering and contributing to the government's long-term plan for the Strategic Roads Network; as such, we would argue that the consultation started in the wrong place. It began by asking 'Where should we build this road capacity?' rather than 'Should we build this road capacity?'

Making National Highways responsible for a decision that could properly involve solutions other than new roadbuilding is rather like putting a goat in charge of your garden. The recent alarming national and global trends of evident climate change give stark evidence that we must make these policy changes sooner rather than later.

It remains absurd that Dover, the busiest port in Britain, still has no rail-freight capacity. There is underused rail capacity between Ashford and Reading that could be upgraded, at a fraction of the cost of the proposed Thames crossing, to divert much of the HGV traffic that currently backs up at Dartford. It's time to change the way we look at our transport policy. ■



Map courtesy of National Highways and OpenStreetMap contributors  
Opposite: Adding additional road capacity helps improve congestion and reduce journey times only in the short term... this is the M25 on the approach to the Dartford Crossing

# Running dry... and dirty

Rather than tackle growing water shortages and worsening pollution, the government has instead attempted to reduce environmental protection.  
By **Richard Thompson.**

**On Monday, June 12, residents in the Coxheath area near Maidstone woke up to find they had no water. That day, temperatures climbed to what was then the highest point of the year at almost 30 degrees.**

South East Water blamed the water outages on these high temperatures, saying they were leading to unusually high demand. Residents were, however, reported in the local media saying those outages were down to the number of houses being built in the area. Similar scenes were occurring across Kent and by June 28 a hosepipe ban had been imposed across much of the county.

Just a week after the imposition of the hosepipe ban, the planning inspector examining the Maidstone Local Plan decided that Coxheath should take 85 extra houses on top of those already planned for the area. This was despite objections from not just CPRE Kent and others but from Maidstone Borough Council itself.

Key among CPRE Kent's objections to Maidstone's Local Plan is that vital infrastructure, such as freshwater provision and sewage-treatment works, cannot cope already so certainly will not cope with the demand the significant increase in housebuilding envisaged will place upon them.

Unfortunately, the harsh reality is that our present planning and regulatory structure places greater importance on expanding housing than addressing critical environmental issues like water scarcity and sewage contamination risks. This becomes glaringly evident in both how the planning



What price our quality of life as housebuilding and developer profits appear to be prioritised over the environment? (Richard Brooks)

system approaches fresh-water and wastewater provision, and how the current government is approaching the current clear failings.

Firstly, a local council cannot decide to build fewer houses on the basis there will be no water to supply these houses. This is because, while councils' Local Plans decide where in their areas new houses should be located, they don't get much of a say in how many houses should be in their areas.

Rather, government policy still requires the use of a standard methodology for calculating housing unless exceptional circumstances exist, with a recent consultation confirming

Water quality at Stodmarsh National Nature Reserve has already been in decline due to excessive nutrients causing eutrophication (Steve Ashton)



that the government does not intend to change the standard methodology until mid to late 2024 at the earliest.

Perhaps surprisingly, a lack of drinking water is unlikely to constitute exceptional circumstances. This is on the basis that, as the entire south-east of England is deemed an area of serious water stress, it is not an exceptional circumstance for individual councils.

Secondly, a water company cannot refuse to provide fresh water even if it does not have sufficient available. This is because all housing developments have a legal right to connect to a supply under the Water Industry Act 1991 and related regulations.

While the same regulations do compel the water companies to outline how they intend to manage water resources over at least the next 25 years with a five-yearly Water Resource Management Plan (WRMP), the reality is a fragmented and complex muddle of individual plans across catchment areas that have no bearing to local council administrative boundaries, against which there are no repercussions should targets or ambitions not be met.

The water companies are clear there is simply not enough fresh water in the short term and so their plans continue to rely on temporary hosepipe bans, as required, for at least the next 10 years to be able to maintain a supply. Longer term, while it is recognised that the supply would need to be increased by at least 40 per cent by 2075 to meet the forecast demand, there is little certainty about how this will be achieved.

With respect to wastewater infrastructure, the situation is probably even worse, with the issue of sewage being pumped into the UK's water system rightly becoming an increasingly pressing political topic. Again, however, it is the case that sewerage undertakers have a duty to provide a connection to a public sewer under the Water Industry Act and can not object to new development on the basis they have insufficient capacity.

In turn, and in theory, they are required to provide any necessary upgrades to ensure the sewage network can cope with new development as to do otherwise would be in breach of their statutory duties. Those making planning decisions are required to assume that this will be the case.

This approach is effectively summarised in Paragraph 188 of the National Planning Policy Framework, which states: "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively".

Where this leaves us is a planning regime that blindly assumes fresh water will always be provided and that sewage will be effectively treated. This is on the simple basis that, as the water companies are required to manage their own networks diligently and effectively under separate statutory regimes, those making planning decisions must assume this will be the case. ▶





# Chairman's Update

**John Wotton**

Despite seemingly insurmountable odds, it's still worth fighting each and every battle to protect our countryside

**It's hard, at this time of year, not to mourn the passing of summer into autumn, perhaps especially this year, when spells of consistently fine weather have been in short supply. Still, I think most of us would count our blessings that we haven't had the extreme heat experienced in southern Europe this summer, or the drought and exceptionally high temperatures of last July and August.**

As I set about the monumental task of mowing the lushest crop of meadow grass I've seen for ages (using yet another expensive new machine that, I vainly hope, will be the answer to all my problems!), I felt there could hardly be better evidence of the unpredictability and instability of our climate. Had the jet stream flowed further north this year, we too (and our precious food crops and ornamental plants) would have wilted in the heat of a Mediterranean summer.

It's natural to feel strongly motivated to do something, personally, about climate change when the evidence of its effects permeates our everyday lives and fills our senses, as it did last summer.

After the sharply cold winter and 'typically British' changeable summer that we've experienced in 2022-23, there's a temptation to hope that things aren't quite so bad, but it must be resisted. The relentless accumulation of record high local air and sea temperatures, the faster-than-expected rises in global temperatures and more devastating droughts and storms are more than sufficient to convince us of the urgency of the need for radical action to combat climate change. The experience of years like 2022 adds emotional conviction to an intellectual understanding of the existential issues we face.

When I reflect on the changes I've seen in the 40 years I've lived in the Weald of Kent,

the most obvious are the sort of things that occupy our day-to-day work in the Kent branch and its various committees, such as urban sprawl, new roads and railways, more traffic, big housing developments on the edge of rural settlements, oast and barn conversions and solar arrays in the countryside.

Hop gardens have all but disappeared from the county, but vineyards have sprung up in their place. There have been obvious ecological changes as well, including ash dieback, more deer and fewer rabbits, more badgers and fewer hedgehogs, more buzzards and fewer cuckoos, but the loss of biodiversity, which is happening at an alarming rate all around us, is less easy to spot.

Who can believe in the collapse in the population of invertebrates, many of which are vital pollinators of the crops on which our lives depend, when the late summer garden is alive and humming with insects of all types? But it is both real and alarming.

In the face of global crises like climate change and the collapse of biodiversity, the individual can feel powerless. Will it really make a difference, we ask ourselves, if I and people like me change our behaviour in small ways, like using less energy or water, or creating wild areas in our gardens, when the impact of our choices is dwarfed by the global activities of the energy and transport sectors, agriculture and manufacturing and extractive industries?

Nevertheless, we follow our consciences and make those changes because we feel it's the right thing to do and that the world will go to Hell in a handcart unless ordinary people make some sacrifices themselves and demonstrate to government and political parties that these things matter to us and will affect the way we vote.

Similarly, the demographic, economic, commercial and political pressures to develop and change the Kent countryside in ways we think harmful can seem overwhelming.

What can the individual or local action group do when faced with a determined and well-resourced developer, supported by a legal framework that tends to favour development and often supported by the local planning authority?

The odds can seem stacked against the objectors, but time and again CPRE has demonstrated that, working together with concerned local people and making determined use of the planning system and the courts, we can make a difference by getting bad developments stopped and bad planning decisions overturned.

We see this reported in each issue of Kent Countryside Voice, including this one. What's more, by working effectively as a national movement, CPRE has shown that policies to which government appears to be committed can be overturned, if enough MPs are persuaded they are vote-losers. We've seen this, for example, with CPRE's successful campaign to change the present government's proposed planning reforms. ▶



Christmas cheer... John shares the laughs with former Canterbury CPRE chairman Barrie Gore



The Weald of Kent has seen tremendous change in the 40 years John has lived there (Kate Lake)

Of course, these battles have to be fought over and over again: thwarted developers come back with amended plans or sell to some other developer who has another go; control of local authorities changes with bewildering frequency; general elections may (and next year probably will) lead to a change of government and a whole new set of planning, housing and industrial policies.

However, when I was a corporate lawyer, many years ago, I often heard the saying 'tax deferred is tax saved' and, by the same token, development deferred is countryside saved.

We can only deal as well as we can with the situation in front of us. If we succeed in getting a harmful planning application refused, or a decision to permit harmful development overturned, then it usually takes quite a long time and involves a lot of effort for the developer to have another go.

Even though the overall pressures seem relentless, it's still worth fighting each battle to protect the countryside. I think we all belong to CPRE because we believe that individuals and communities can exert influence and make a difference, however relentless our opponents may seem. In AH Clough's words:

"Say not the struggle naught availeth,  
The labour and the wounds are vain,  
The enemy faints not, nor faileth,  
And as things have been they remain.

"If hopes were dupes, fears may be liars;  
It may be, in yon smoke concealed,  
Your comrades chase e'en now the fliers,  
And, but for you, possess the field.

"For while the tired waves, vainly breaking  
Seem here no painful inch to gain,  
Far back through creeks and inlets making,  
Comes silent, flooding in, the main.

"And not by eastern windows only,  
When daylight comes, comes in the light,  
In front the sun climbs slow, how slowly,  
But westward, look, the land is bright."



## ...Chairman's Update

My five-year term as Kent branch chair will end at our AGM on November 10, so this is my last Update for KCV. My nominated successor as chair is Ben Moorhead, a retired solicitor (yes, another one!) who lives near Charing, is a committed conservationist, has long, high-level experience on boards of directors and charity trustees and also has family connections with CPRE Kent.

I'm grateful to him for agreeing to take up the mantle and am confident he will provide the trustees with sound and inspiring leadership. The time for thanks to my Kent branch colleagues will be at the AGM, but I do wish here to record my admiration for the

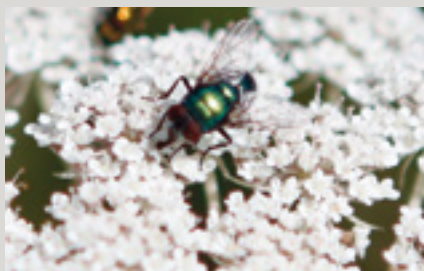
work and commitment of Hilary and the staff team at Charing and my gratitude for the support and wise counsel I've received from my fellow trustees and committee chairs.

The Kent branch is in good shape and so is the CPRE movement as a whole, with sound and experienced leadership at the national level and the network of branches working effectively together as a result of much collaborative work undertaken over the past couple of years, culminating in the establishment of CPRE's National Assembly, which is off to a good start.

Finally, I warmly recommend *The Women who Saved the English*

*Countryside*, by Matthew Kelly, which I read recently. It contains short and inspiring biographies of four women, Octavia Hill, Beatrix Potter, Pauline Dower and Sylvia Sayer, focusing on the crucial roles they played in protecting for the public large swathes of the countryside. CPRE played a role in several of the campaigns described in the book.

The account of Hill's tireless efforts to enable the National Trust to acquire a string of properties along the Greensand Ridge, between Oxted and Sevenoaks, linked by the Greensand Way, is fascinating and of particular local interest. ■



From bees and flies to butterflies, insects fulfil a critical role for our wider environment (all images Paul Rider)

# Why we should love insects more than we do

**Kevin Pressland** is a member of CPRE Kent and campaigner for nature and the natural environment. His understanding of the threats faced by the natural world is based on a 40-year career in horticulture, garden design and sustainable land management. Here he highlights the crisis in our insect populations and the danger this poses to human life.

## We need insects

We are facing a crisis in our insect populations. Figures show a 69 per cent reduction in insect numbers over the last 10 years in Kent and a fall in insect numbers for decades previously. The average reduction in insect populations over the last 10 years in English counties is 59 per cent.

We ignore the plight of insects at our peril. Our welfare depends on insects for pollination, to feed birds and other small animals and for soil and water health.

Almost 75 per cent of our produce is reliant in one way or another on the work of insects. Important types are bees (wild solitary bees and bumblebees, as well as domesticated honeybees), flies (including hoverflies and bee-flies), butterflies, moths, wasps and beetles.

## The food chain

In turn, these creatures feed a plethora of birds, amphibians and freshwater aquatic life. They are also intrinsic to healthy soils - whether it be carotid beetles that predate slugs, or insect associates like nematodes that also help control slugs.

There is strong evidence that the decline in insect numbers has been happening since the push towards intensive farming, including the use of cocktails of chemicals such as herbicides, pesticides and fungicides. This has been exacerbated by changes in land management, loss of hedgerows and other wildlife corridors and reduced arable stubble.

Insects are often adversely affected by the constant onslaught on our remaining semi-natural and ancient woodlands, with authorities often giving the impression these can easily be replaced by simply growing a few more trees.

## What can we do?

Wildlife corridors are vital. They are needed through towns,

through the countryside and through new developments to connect remaining fragmented habitats. When we are building many more properties, we also need to be creating green corridors through these developments that both improve people's quality of life and create those important wildlife passages.

## Farming is changing

Subsidies for farming are changing. The Basic Payment Scheme effectively gave money for how many hectares you had (nothing for those with less than five hectares), generally without any specific obligations on the use of this money unless you agreed to be in additional schemes such as Countryside Stewardship. But a transition is happening, with the BPS being phased out and due to end in 2027.

Now farmers will only get subsidies based on public-good criteria, including better soil management, creating habitats such as hedgerows and wildflower meadows, tree-planting (agroforestry) and repairing and enhancing river and wetland landscapes under Environmental Land Management. There is a large range of options that farmers can choose - but no obligations to take these on.

The Regenerative Agriculture Conference in June attracted more than 6,000 attendees, many of them farmers searching for systems that minimise inputs and create more cyclical farming systems (to learn more, see [groundswellag.com](http://groundswellag.com))

## At a local level

We can all manage our gardens in ways that support insects and other wildlife (see, for example, [www.rhs.org.uk/protectingwildlife](http://www.rhs.org.uk/protectingwildlife))

For more information on sustainable farming practices, visit [agricology.co.uk](http://agricology.co.uk) and [soilassociation.org](http://soilassociation.org)

For more on agroforestry, visit [regenerativefoodandfarming.co.uk/agroforestry](http://regenerativefoodandfarming.co.uk/agroforestry) ■

# A full and worthwhile life

David Morrish, chairman of CPRE Kent's Thanet committee, died in March at the age of 78. Here, friend and Thanet CPRE secretary **Geoff Orton** remembers a "most sociable and good-natured fellow".



**Members and supporters of CPRE Kent would have been saddened to learn of the passing of David Morrish at home overlooking Westgate's West Bay after a long, valiant struggle with a heart condition that had only developed over the last couple of years.**

On the premise that Thanet had "the best coastline in the South East and a relaxed lifestyle", he and his wife Pat arrived in Westgate in 2015 from the Midlands and threw themselves into community life.

David had matriculated from grammar school in Birmingham to Leeds University reading rugby (allegedly with some civil engineering thrown in) and proceeded from there to the infant Telford Development Corporation and thereafter as a borough and county engineer in Staffordshire; he also became a town councillor.

At the well-attended service at St Saviour's (Pat's Thanet Festival Choir doing us proud), Jonathan, David's eldest son, suggested that Telford was where his father had cut his traffic planning teeth (so might have much on his conscience in some eyes).

Be that as it may, it was Thanet's initial 12,000-house Local Plan that inspired David to become a founder member of the Westgate LP Action Group, where his professional expertise was highly valued and led to him becoming a founder Westgate town councillor, chairing the environment sub-committee and setting up the original Neighbourhood Plan (now of course in need of a substantial rethink consequent to a change in central government philosophy).

It was David's initiative that revived CPRE Kent's Thanet branch, which had been in 'suspended inanimation' for several years and which he chaired with a certain inimitable bluff earthiness.

He took a keen interest in his adopted county and was proud to have been elected as a trustee of the county organisation, contributing his expertise to our wider concerns. I should like to think that David's spirit mentored our recent concerns over the Thanet North Link Road proposal - he was an 'established correspondent' with KCC Highways!

David had been a keen Scouter up in Staffordshire for most of his working life - indeed his self-proclaimed countryside epiphany came in 1959 when despatched for a three-day Scouts expedition through the 'Blue Remembered' Shropshire Hills - and was delighted to be enrolled as a guide at Draper's Mill in Margate, taking the opportunity to instruct visitors, especially young ones, in the 'craft' that trained canal builders, who trained railway engineers.

His enthusiasm was much appreciated by the Margate Civic Society members who essentially run t'mill. He had also been involved with the Westgate Conservation Area Advisory Group, giving talks to Westgate Heritage Centre on sea defences and to The Margate School's eco conference on the George V Park underground drainage system.

And as if that activity wasn't enough, David also became a specialist on Australian bush poet and author 'Banjo' Paterson (Waltzing Matilda fame), writing for the Westgate Creative Writing Group. In his leisure he enjoyed beer and banter in Bake & Alehouse, where he will be remembered as the most sociable and good-natured of fellows taken from us far too soon and held in great affection by us Southerners.

Our condolences go to Pat, David's three sons and numerous grandchildren, who have an outstanding example of community spirit and how to lead a full and worthwhile life to follow. ■



# Campaigns

How CPRE Kent fights for our rural environment across the county

## Highland Court

On Tuesday, July 7, Canterbury City Council planning committee took the decision to permit the building of a huge winery at Highland Court Farm in the Kent Downs Area of Outstanding Nature Beauty, south of the city.

This decision was made despite significant objection, including from both Natural England and the Kent Downs AONB Unit. It was also despite the council having once already conceded to a legal challenge that a previous attempt to grant permission for the scheme was unlawful.

It is CPRE Kent's opinion that this permission will lead to devastating industrialisation of an area of countryside that has specially protected status and should be conserved at all costs. There are many other places where such a development on this scale could have taken place without causing such damage to our countryside.

For these reasons, CPRE Kent sought to challenge the decision by requesting Michael Gove, Secretary of State for Levelling Up, Housing and Communities, 'call in' the decision so he would make the decision rather than Canterbury City Council. The National Association for Areas of Outstanding Natural Beauty supported us in our request.

Regrettably, we were advised on Tuesday, September 5, that this request had been unsuccessful. We will therefore now be considering whether there are further options to challenge the decision.

## Turnden

On Thursday, April 6, Michael Gove made a nationally significant decision to refuse planning permission for an estate of 165 homes on greenfield land at Turnden, a former farmstead outside Cranbrook, in the High Weald AONB.

The decision to refuse was contrary to both the recommendation of a planning inspector and the decision by the Tunbridge Wells planning committee to grant permission and was reported widely across national media.

Importantly, the decision highlighted an increased emphasis being placed by the Secretary of State for Levelling Up, Housing and Communities on the need for design sensitive to the site's location in the High Weald AONB, criticising the proposed design for its "generic suburban nature". He has subsequently called in other applications on similar grounds.

The construction industry mounted a vigorous media campaign against Mr Gove's decision.

CPRE Kent played a full part throughout the process in opposing the development, supporting Natural England's request to the Secretary of State to call in the application, acting as a formal 'Rule 6' party at the planning inquiry and working closely with Natural England, the High Weald AONB Team and a local action group, all of whom shared our view

that this development would be contrary to planning law and policy and harmful to the protected landscape. We were therefore initially delighted with the decision.

Subsequently, the developer Berkeley Group applied to the High Court for a judicial review of the decision. It is since understood that a Consent Order has been submitted to the court for sealing to quash the Secretary of State's decision on very limited grounds and the matter will now go back to the Planning Inspectorate.

While at the time of writing we are awaiting further details confirming next steps, this David and Goliath battle is far from over.

## Sea Link

There are growing concerns that National Grid's proposals for its Sea Link scheme - the development of an underwater electricity link between Suffolk and Kent with onshore converter stations at either end - could prove a disaster for wildlife.

The Sea Link project document says the link would make landfall (where it transitions from offshore to onshore) in Kent at Pegwell Bay, part of Pegwell and Sandwich Bay National Nature Reserve, where important saltmarsh habitat has still - after some five years - not recovered satisfactorily from the placing of Nemo Link cabling through the site.

The NNR is one of the county's most valuable sites for wildlife and, among a range of other things, CPRE Kent wants to see evidence that NG has properly ruled out less environmentally damaging options, including the use of suitable brownfield sites, and is intending to carry out a Cumulative Impact Assessment of the project.

NG's "emerging preference" for the Kent converter station is in the Richborough area, close to Pegwell and abutting the Sandwich Bay to Hacklinge Marshes SSSI, which would almost certainly be adversely affected.

A first-stage public consultation on the project ended in December last year, but many people missed it, saying it was poorly publicised.

A widespread criticism of the scheme is that it is light on detail. It can only be hoped that is rectified during the statutory consultation due to be held from Tuesday, October 24, before NG's intended lodging of an application for a Development Consent Order with the Planning Inspectorate, possibly next year.

CPRE Kent plans to make substantial representation to the statutory consultation.

- A Facebook page highlighting the threat posed by National Grid's Sea Link plans has been set up. To learn more, go to Facebook and search 'Save Minster Marshes'.



- Find the Sea Link consultation and project information at [nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/sealink](https://nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/sealink)

### **Betteshanger Country Park**

Dover District Council planning committee on Thursday, July 13, agreed to refuse planning permission for Quinn Estates to build a 120-bed hotel and spa on the protected open space and community asset of the country park.

CPRE Kent had worked closely with Friends of Betteshanger, the RSPB, Buglife and Kent Wildlife Trust to protect this rewilded colliery site that is a fine example of how nature can recover from the impacts of industry.

After the planning committee had met, and before DDC issued its decision notice (to refuse planning permission), Quinn Estates withdrew its planning application.

And, as many had predicted, almost two months later the developer submitted a revised application with changes that it says would benefit wildlife - these include relocation of the proposed spa to allow for the retention of two ponds; dropping the plan for an outdoor pool; and provision of an additional nine acres of managed land for turtle doves.

There are also plans from the same applicant to build a surf lagoon on the site.

CPRE Kent and its partner groups have been preparing to use all legal means necessary to defend the country park and its wildlife, launching a CrowdJustice appeal to fund expert advice and possibly legal representation depending on how events unfold.

If you can donate, please visit [www.crowdjustice.com/case/save-betteshanger-wildlife](https://www.crowdjustice.com/case/save-betteshanger-wildlife) or the CPRE Kent website, [cprekent.org.uk](https://cprekent.org.uk)

### **Swanscombe peninsula**

Conservation charities have written to Michael Gove calling on him to step in and remove a controversial planning direction that threatens the future of this nationally important wildlife site in north Kent.

The Swanscombe peninsula has been subject to a direction to be declared a Nationally Significant Infrastructure Project (NSIP) since 2014, but campaigners have called on the Secretary of State for Levelling Up, Housing and Communities to use his powers to help secure its future by revoking the direction.

The Swanscombe peninsula is home to more than 2,000 species of invertebrate, including the critically endangered distinguished jumping spider, and 82 species

of breeding birds, including nightingale. It is also home to man orchids, water voles and otters.

However, it has been under threat from an NSIP application for the London Resort Theme Park - a planning route normally earmarked for major projects like roads and power stations. The conservation charities say this status is hindering attempts to save it and win support to enact a vision for the site that was developed together with the local community.

Since the direction to be considered an NSIP was made, the site's wildlife value has come to the fore, culminating in its designation as a Site of Special Scientific Interest (SSSI) in 2021 by Natural England, the government's adviser for the natural environment in England.

This contributed to the withdrawal of a theme-park application in 2022 and growing support for a vision that would see the retained Swanscombe peninsula at the heart of a thriving community wildlife haven.

However, with the NSIP direction still in place, the groundswell of support cannot translate to action and commitment by decision-makers. The charities' letter to Mr Gove calls on him to use the powers afforded him under the Planning Act to revoke the controversial status and enable plans for the community- and wildlife-led vision for the Swanscombe peninsula to come to fruition.

In July, Adam Holloway, MP for Gravesham, visited the peninsula with representatives from conservation groups and expressed his support for the vision.

To learn more about the vision and how you might be able to help, visit [www.saveswanscombepeninsula.org.uk](https://www.saveswanscombepeninsula.org.uk) or the CPRE Kent website, [cprekent.org.uk](https://cprekent.org.uk)

### **Lower Thames Crossing**

The examination hearings for the Lower Thames Crossing are now well under way, with CPRE Kent taking an active role at the issue-specific hearings, along with responding to the various written questions. The examination hearings are scheduled to run until Wednesday, December 20.

It is CPRE Kent's overarching view that the adverse environmental and financial impacts of the proposed project outweigh any of its purported benefits. Originally promoted as a solution to the congestion and air pollution at the Dartford Crossing, it is now clear that the LTC's principal function is to 'open up' north Kent and south Essex for even greater levels of development.

The construction of the UK's biggest road project since the M25 was completed is contrary to the government's stated climate pledges, while its £9 billion (and rising) costs do not sit comfortably with the rest of the commitments facing the government's budget. We can't keep building roads to ease congestion.



# More than just brownfield

There are more visually striking landscapes, but the Swanscombe peninsula hosts a fantastic array of wildlife (Donna Zimmer)

## **Vicky Ellis reveals the surprisingly rich natural wealth of previously developed land**

**It's no secret that CPRE, the countryside charity, pushes the Brownfield (BF)-first agenda, and so it should.**

There are 27,342 hectares (67,563 acres) of BF in the UK on the register, and probably a lot more than that not registered. Developing on BF could save the equivalent area in greenfield or farmland from being destroyed - that would be a significant amount of countryside saved.

However, not all BF is suitable for development; it might be that it lies in a flood zone or is heavily contaminated, or it might be that certain BF is classed as priority habitat - open mosaic habitat on previously developed land, to be precise.

It is these unexpected, wondrous and rewilded areas of BF that we need to be aware of so we can preserve them and keep them special.

At first, one could be forgiven for thinking 'What's so special about a concreted or pre-industrial area with a few weeds scattered about akin to the film set of a Mad Max movie?'. But look closer and all will be revealed...

What defines open mosaic habitat (OPH)? The criteria for OMH are set out in the UK Biodiversity Action Plan Priority Habitat Descriptions as follows:

1. The area of open mosaic habitat is at least 0.25ha (0.62 acres) in size.
2. Known history of disturbance at the site or evidence that soil has been removed or severely modified by previous use(s) of the site. Extraneous materials/substrates such as industrial spoil may have been added.
3. The site contains some vegetation. This will comprise early successional communities consisting mainly of stress-tolerant species (*eg* indicative of low nutrient status or drought). Early successional communities are composed of (a) annuals, or (b) mosses/liverworts, or (c) lichens, or (d) ruderals, or (e) inundation species, or (f) open grassland, or (g) flower-rich grassland, or (h) heathland.
4. The site contains unvegetated, loose bare substrate and pools may be present.
5. The site shows spatial variation, forming a mosaic of one or more of the early successional communities (a)-(h) above (criterion 3) plus bare substrate, within 0.25ha.

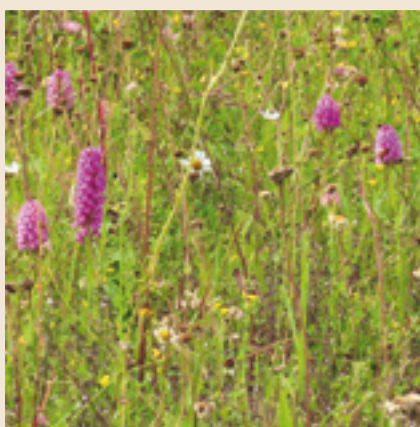
Areas of open countryside would, if left, eventually undergo succession and develop from primary succession



Betteshanger Country Park has been targeted for the development of a surfing lagoon and luxury hotel and spa (David Mairs)



Orchids are a Swanscombe speciality - from left, bee orchid, pyramidal orchids and man orchid (Donna Zimmer)



into secondary succession and then finally the climax community (woodland). Brownfield suppresses these successions, only offering sustenance and root growth for ruderals, mosses and liverworts, lichens, certain grasses and other short-lived herbaceous perennial wildflowers, interspersed with bare earth, concrete or other spoil.

Due to the varying nature of BF sites, the variety of species that can colonise these areas can be extremely diverse in nature and thus gives us this rich tapestry of open mosaic habitat.

Due to the general low vegetation height and often sparse nature of rewilded BF sites, they offer excellent foraging opportunities for species that would ordinarily be pushed out from areas where succession has progressed further.

Many invertebrates, birds and small mammals come to rely on rewilded BF sites and all they have to offer. Some BF sites are so exceptional that they have been afforded SSSI (Site of Special Scientific Interest) status.

In Kent, one BF site alongside the Thames estuary on the Swanscombe peninsula has been declared an SSSI, while another place being considered for SSSI status is Betteshanger Country Park in the east of the county.

Both are unique in their own way, one having been used for the dumping of fly ash from the area's former cement industry and targeted for landfill, the other a former spoil tip of the now-closed Betteshanger Colliery, and both offering diverse and different habitat types and thus attracting their own eclectic and rare species.

The Swanscombe peninsula has become home to the critically endangered distinguished jumping spider and supports an enviable and significant bird assemblage. Betteshanger Country Park, meanwhile, hosts the second-largest colony of lizard orchids in the UK and is home to the threatened turtle dove and fiery clearwing moth.

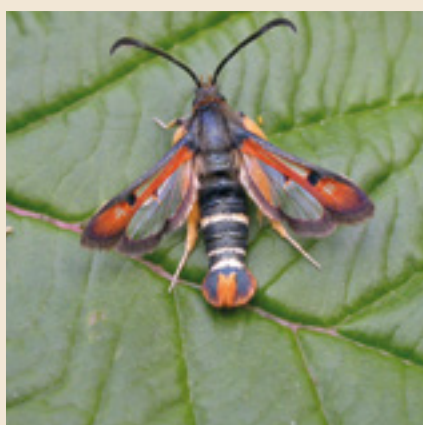
Here are two very different BF sites offering two very different open mosaic habitats but equally as special and significant ecologically.

### Early successional habitat

Early successional habitat is made up of any species that first settles on disturbed land. Because nature is dynamic, early successional plants and fungi are often temporary. ▶



Sussex emerald and fiery clearwing, below, are two of the scarce moths found at Betteshanger Country Park (Francis Solly)



Betteshanger Country Park hosts the second-largest colony of lizard orchids in England (Colin Skinner)

As small plants get robbed of sun and are unable to photosynthesise effectively, they eventually give way, along with any species of fauna that rely on them, to taller, faster-growing plants.

This is what makes open mosaic habitats on previously developed land so important. They let in nature but only to a certain degree. However, they still need managing because eventually flora succession will occur, be it extremely slowly, for example much more slowly than on open greenfield.

Open greenfield might begin to have scrub encroachment and seedling trees recolonise in as little as a year, depending on surrounding vegetation, whereas BF can take 15 years or more before showing any signs of scrub or tree growth.

It's as if time has slowed right down on these sites and the clock has all but stopped, nature being held in a type of suspended animation. Delicate wildflowers are given centre stage and afforded a longer opportunity in which to thrive and colonise.

At each stage of succession, plant communities alter the substrate and transform the microclimate, creating habitat for the next phase of succession and group of plant species. The early successional plants enjoyed the nutrient-poor habitat offered by BF, but once these plants die off they begin to build a layer of organic matter and so very slowly, over many years, this organic matter builds up, worms and other invertebrates move in and the substrate is altered, giving way to faster-growing flora that require a more fertile and deeper substratum in which to grow.

### Fauna that can thrive on brownfield

Some of the species that can be found on rewilded BF sites include brown-banded and shrill carder bees; slow worm, common lizard, adder and grass snake, which bask on the warm hardcore; butterflies such as dingy skipper and grayling; beetles such as saltmarsh shortspur and streaked bombardier; spiders including the horrid ground weaver spider; and wasps such as black-headed mason and four-banded weevil wasps.

Then there are the bats and other small mammals, amphibians, birds, moths, flies and a plethora of other rare and fascinating fauna often not found in the same numbers elsewhere.

BF is but one vital factor in our fight to save our countryside, but as our countryside recedes and gives way to more and more intense development and human disturbance, so BF's significance in offering a safe haven to wildlife grows. Indeed, some BFs become vital green spaces and green lungs in an otherwise urban environment for the local community to enjoy.

Hence we must be careful and measured when assessing which BF sites we regenerate and which of those need to be protected.

Next time you come across a BF area, stop for a moment and take a closer look, as long as you're not trespassing, and see which lichens, mosses, fungi or wildflowers have begun to colonise. Note the invertebrates and pollinators taking advantage of these most delicate of plants - you might be surprised.

It could be the edge of a pavement, a stone wall or perhaps where a shed used to stand many years ago, but the message is the same: as humans move out, nature moves back in. ■

# HENNY SHOTTER: a volunteer's story

**'Superb colleague  
and an inspiration'  
handed CPRE awards  
for her efforts**



**Henny Shotter, for so long one of CPRE Kent's most active and devoted members, was in May recognised for her sterling efforts in helping protect our rural heritage.**

Every year, county branches nominate some of those who have been putting in the hard yards for CPRE Countryside Volunteers Awards - and this time round Kent decided it was Henny's time in the sun. She was joined at Cherry Downs near her beloved Lenham by John Wotton, CPRE Kent chairman, who handed her a certificate for special contribution and demonstrating and embodying CPRE values (see images above).

Described by colleagues at CPRE Kent as "a superb colleague and an inspiration", Henny had also been involved with CPRE while living in Lincolnshire. The CPRE Kent nomination read: "Being an active volunteer during a period of Local Plan-making in Maidstone borough involved an enormous amount of work, especially in relation to controversial proposals for garden settlements in the borough.

"As a committed and knowledgeable environmentalist, Henny has been active in our environment group, anticipating many of the issues that now loom largest in our work, including water scarcity.

"A conscientious and always constructive member of the board of trustees, Henny displays sound judgement of issues and people. She is a superb colleague, valued and appreciated by fellow volunteers and staff of the Kent branch."

Far better, though, to let Henny do the talking, so here is her story...

"It was a development on the North Downs near my home that spurred me on to become an active member of CPRE 35 years ago.

"Except for the years when we lived abroad, I was actively involved in some sort of role with CPRE in Kent (district representative, Maidstone East), Lincolnshire (South Kesteven district group, branch vice-chair) and again Kent (Maidstone group and trustee).

"My interest in the relationship between the built environment and people, the natural world and resource management, such as water or agriculture, had, however, begun earlier at

university in my home city of Stuttgart, in interdisciplinary seminars with planners and architects.

"Most important was the report of the Club of Rome about the Limits to Growth in 1972. It made me aware how precious the natural world was and that we must be innovative in safeguarding it. Some years later, the running joke in my family was 'Mum gets all excited when she sees solar panels on roofs'.

"We still build houses without solar panels or rainwater recycling. We still build houses in places with excellent soil - even Grade 1! - which we ought to protect for the production of food, especially in times of climate change.

"Now we even build houses in areas that are on floodplains, as happened at Bearsted, near Maidstone. We now build houses near the sensitive area of river headwaters, as is happening at Lenham and Otterpool.

"We live with loopholes in planning laws, which undermines the protection of the AONBs and the most important water store in the county, the North Downs.

"Since the introduction of the National Planning Policy Framework in 2011, urbanisation has immeasurably damaged our most important natural resource: the countryside.

"We have, though, made some progress. In the early days of my involvement with CPRE Kent, in the late 80s, I wrote an article for its magazine Kent Voice about the virtues of recycling and residual waste incineration.

"I am happy that today nothing that I take to my recycling centre in Ashford ends up in landfill. One piece of countryside spared. Some battles were lost and some were won. Was the effort worthwhile? Of course it was. Even the battles lost helped raise the profile of the countryside.

"As a volunteer for CPRE, I have had the privilege of working together with highly motivated and highly qualified volunteers and professionals. It has been interesting and challenging. A privilege indeed - and one I wholeheartedly commend to others." ■

# OTTERPOOL PARK

## garden city or garden suburb?

**Graham Horner**, chairman of our Shepway committee, looks at the vast new community being targeted for the south of the county and compares it with urban planner Ebenezer Howard's original concept of such settlements

### **The vision of Ebenezer Howard**

The term 'garden cities' has been around since the 19th century. Ebenezer Howard crystallised the concept in 1902 in his seminal *Garden Cities of Tomorrow*. The idea of well-planned, new, self-sufficient settlements as an alternative to metropolitan sprawl aligns closely with CPRE's objectives, although the motivations in the late 19th century were different to today's.

In Howard's big idea, the new cities would attract people from dense, unhealthy slums in London to places where they could live, work and play without having to leave the confines of their 1,000-acre (405ha) town. The town would be supplied from the surrounding 5,000 acres (2,025ha) of farmland, which would forever separate it from the next garden city. His diagrammatic city plan was a circle 1.4 miles in diameter - everything was within walking distance for the 30,000 inhabitants of the urban area.

Most of Howard's treatise was devoted to the financial aspects. The scheme relied on obtaining farmland at little more than farmland prices. Then the rents charged on farmers, businesses and residents of the 5,500 houses were, he argued, enough to provide for the municipal infrastructure such as roads, tramways, parks, schools and shopping arcades. Investors putting up the initial capital would be paid back from the income of the estate.

How would you stop landowners insisting on inflated prices? Howard envisaged a certain altruism combined with the threat of compulsory purchase. In principle, he argued, the landowning class would benefit from the gentrification of the former slums in London - a 'win-win'.

### **What happened?**

The first garden cities - Letchworth and Welwyn - adhered to Howard's concepts but didn't achieve self-sufficiency. The idea that manufacturing would migrate to the new towns, with blue-collar workers being enticed out of the slums, didn't materialise. By the 1950s the motor car had, in the minds of planners and the public generally, removed the need for short distances to work, shops or entertainment. This enabled residents to commute outside the town and it also removed the original reason for them to be compact. While Letchworth and Welwyn remain at least 'bikeable' in size, Milton Keynes covers four or five times their area and was designed for the motor car.

Today we are approaching full circle. There is much talk of 15-minute neighbourhoods - parts of cities in which amenities can be reached within walking or biking distance for all residents. The concept is also being extended to the countryside - groups of villages close to each other are being (re)planned as units. Non-motorised transport links between

Going under bricks and mortar... this huge wheatfield west of the former Lympe airport is set to become part of Otterpool Park



them are being improved so they can share facilities that each could not support on their own. This reflects the change in attitude towards motor vehicles from that prevailing in the last century. This is something CPRE supports wholeheartedly.

Howard's garden cities had generous green space within them. This has survived in garden towns (and in 'garden suburbs', which Howard hated). Some 40-50 per cent green and blue (water) space seems the norm now for developers to attach the name 'garden' to their proposals, even if none ▶

of the other elements of the garden city apply. But are we maybe providing too much green space between the houses, thus increasing the overall land-take of these developments? Market towns are rarely so endowed with green space but are still attractive places in which to live.

The garden city concept is still as valid as ever. The difference now is job mobility has increased and with often several breadwinners per household it's more difficult for all to find jobs nearby. Non-motorised transport has become something to be encouraged (by design) rather than a 19th-century necessity. Also, Howard did not have to include measures for biodiversity and climate change in his calculations.

### **Otterpool Park - a real garden city?**

First the good things. The master developer, Otterpool Park LLP (OPLLP), is wholly owned by Folkestone & Hythe District Council, hence 'not for profit'. A lot of the land has been bought relatively cheaply, although the final price for land that is under options to buy is not known. FHDC did manage to satisfy the planning inspectors for the Local Plan that it was financially viable. Then there's the '50 per cent green space' pledge. And there is a commitment to 'walkable neighbourhoods' and emphasis on non-motorised transport within the town itself at least. A range of housing types is on offer, although 22 per cent 'affordable' is too little. Biodiversity net gain is promised, and a 'best efforts' attitude to carbon neutrality - good but not good enough.

Otterpool Park will never be a stand-alone, self-sufficient community. The main employment areas proposed will not even be developed until later phases. The sales pitch emphasises Westenhangar station so, yes, there will be convenient 'sustainable' transport to Folkestone, Dover and Ashford but none to Canterbury and the ambition to get high-

speed trains to stop there gives the game away - this will be a dormitory town for London, not a garden city but a garden suburb. Will it ever have a distinct sense of community? Today, the finances look precarious. The money needed to progress until receipts start to come in from house sales has almost doubled since the Local Plan examination. A consequence is that the council thinks it essential to first develop the land it has already bought rather than land it has options to buy. That means there will be two centres of development, one at each end of the site, with a building site in between for many years hence.

### **What needs to happen**

The time for opposing this development in its entirety is long gone, and if it were cancelled now what would be the alternative? FHDC needs to progress it rapidly to ward off speculative housing proposals in less suitable locations. This needs managers with experience in delivery of £2 billion projects as well as governance of the result. OPLLP currently appears stronger in the latter than the former and at risk of groupthink with former colleagues in the council and its board - also appointed by the council. Some harder noses would give better protection for the public purse.

It is laudable that FHDC has a vision, but I say it should stop thinking of Otterpool Park as a 10,000-home town to be developed in stages and think more about a 2,000-home town that will in time be extended - preferably from the centre outwards so the impact on the setting of the Kent Downs AONB and on neighbouring communities is delayed as much as possible.

It must 'work' from the very beginning. That way it stands the best chance of fulfilling FHDC's vision even if not Ebenezer's. ■



Architecture students adapt to changing times as contest returns after break

**In a change to the standard convention, this year's prestigious Gravett Architectural Drawing Award was split three ways.**

The award, sponsored by CPRE Kent's Historic Buildings Committee, is given for the best observational drawings of buildings or structures produced over the past year by an undergraduate at Kent School of Architecture and Planning, part of the University of Kent at Canterbury.

The most recent contest had been in 2019, the Covid-19 pandemic having enforced a break in proceedings. And on its return, after 19 students had been shortlisted, Julia Bambane, William Bates and Dania Ayaz shared the honours (and £300!).

The event was hosted by Ptolemy Dean, one of the country's finest architects and a former Kent College pupil; he also chaired the three-judge panel.

Clive Bowley, one of the judges, praised the quality of Julia's work while also noting the excellent impression made by William's images and general approach to the concept of drawing buildings.

As for Dania, he said her "fresh, modern approach, with images drawn on an iPad, made us realise that the times they are a-changin' and that drawing today isn't always done in an old battered drawing sketchbook".

Above: From left, Manolo Guerci (KSA), Nick Blake (judge), Gerry Adler (KSA), Graham Horner (CPRE Kent Historic Buildings Committee), Dania Ayaz (joint prize-winner), Ptolemy Dean (judge), Nyrah Derrick (student) and William Bates (joint prize-winner). Below: The Poetry of Chaos Within The Soanean Style, presented by Dania Ayaz.



# 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**

- A revised timetable for a review of the adopted Local Plan was published in March 2023. The first round of public consultation is programmed for spring 2024.

## **Canterbury**

- Following the local elections in May, proposals for traffic zoning in Canterbury have been scrapped (these formed part of the Regulation 18 Local Plan consultation last summer). A timetable for future Local Plan consultation is awaited.

## **Dartford**

- The Local Plan examination closed in May. Consultation is now taking place on main modifications, pending formal adoption of the Plan.

## **Dover**

- Examination of the Local Plan starts on November 14.

## **Folkestone & Hythe (formerly Shepway)**

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

## **Gravesham**

- The next round of consultation is awaiting resolution of issues surrounding traffic modelling in connection with the proposed Lower Thames Crossing. Examination is programmed for July 2024, with adoption at the end of that year.

## **Maidstone**

- Examination hearings closed in June. The inspector's final report is awaited, after which there will be consultation on proposed main modifications.

## **Medway**

- The next round of consultation was programmed for this autumn. However, with the setback over government funding for infrastructure on the Hoo peninsula, it's not clear whether this will take place as planned.

## **Sevenoaks**

- Regulation 18 consultation took place at the end of last year. A further round of Regulation 18 consultation is expected this autumn.

## **Swale**

- The council has resolved to postpone further consultation until the Levelling Up and Regeneration Bill has gained Royal Assent and guidance is published giving greater certainty in relation to the Local Plan system.

## **Thanet**

- A revised Local Development Scheme was published June 2022. Regulation 18 consultation is scheduled for this autumn.

## Tonbridge and Malling

- A new Local Development Scheme was published in June 2023. Regulation 18 is scheduled to take place in spring 2024.

## Tunbridge Wells

- After examination hearings, the inspector's initial findings were published in November 2022. The inspector is awaiting further clarification from the council on how it proposes to address issues including release of Green Belt for a new garden settlement at Tudeley.

District	Plan	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Jul-Sept 2024	Oct-Dec 2024	Jan-Mar 2025	Apr-Jun 2025	Notes
Ashford	Local Plan 2040			Consultation					Adopted February 2019
Canterbury	Local Plan 2040		Consultation						Adopted 13.7.17
Dartford	Local Plan 2036		Adoption						
Dover	Local Plan 2020-2040	Examination			Adoption				
Folkestone & Hythe	Places and Policies Local Plan								Adopted 16.9.20
	Core Strategy Review 2020								Adopted 30.03.22
Gravesham	Core Strategy Review and Allocations DPD 2036	Consultation			EIP	Adoption			
Maidstone	Local Plan 2022-2037			Adoption					Adopted 25.10.17
Medway	Local Plan 2019-2037		Consultation						
Sevenoaks	Local Plan 2015- 2035	Consultation		Consultation		Examination			
Swale	Local Plan 2022-2038				Consultation				Adopted 26.7.17
Thanet	Local Plan 2020-2031				Consultation				Adopted 9.7.20
Tonbridge & Malling	Local Plan 2031	Consultation			Consultation				
Tunbridge 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):** hearings 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.

- For guidance on Local Plans, see FAQs at [www.cprekent.org.uk](http://www.cprekent.org.uk)

### KEY

Regulation 18

Regulation 19

EIP

Adoption

# 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.**

## Ashford - Christine Drury

- After the May elections, Ashford Borough Council has a new leader, Noel Ovenden, and a new cabinet. While much of Ashford's upcoming Local Plan review is likely to follow a similar strategy, the new Plan might reflect a stronger voice for local communities.
- The greatest uncertainty as this piece is written is how Natural England's calculation instructions on nutrient neutrality will evolve. The government had announced amendments to the Levelling-up and Regeneration Bill that if voted through would have been likely to stop the current investments in wetland reedbeds and custom sewage treatment plants. These are being specified and built by developers now to prevent harm to the downstream Stour catchment at Stodmarsh National Nature Reserve. While the proposed amendment was defeated by the House of Lords, this ever-changing position is serving only to create yet further uncertainty.
- Quite separately, Ashford, like all districts across Kent, will be considering the likely effects from November of a new era of mandatory requirements on developers to ensure biodiversity net gain of 10 per cent on sites that are developed. This could be good news for the countryside and landowners as developers deliver space for nature on- or off-site, following new calculation formulae - also specified by Natural England.
- Clarity on both issues will be a high priority for Ashford in the 2040 Local Plan. The borough is in a good starting position, having done a lot to get a new wildlife site started on the High Field east of Sevington's Inland Border Facility.
- Planning threats to the countryside include an NSIP application for a giant solar industrial installation around Aldington, arguably easily delivered because of proximity to the converter station as a grid connection but with huge impacts on the rural setting of Aldington as a historic ridge-top Saxon Shore village.
- All of Ashford looks with alarm at Maidstone's plans for a Heathlands mega-development to the west and Folkestone and Hythe's already-established plans for the Otterpool mega-development to the east. This presents an important challenge to give a voice to the countryside buffer zones to the west and east.

## Canterbury - Nick Blake

- We are still waiting to see if the newly-elected Labour/LibDem city council will have the will to go its own way, especially regarding the Local Plan update. As yet it has had no consultations with the public.
- It is known that the expected cost of the ill-designed Sturry relief road, including the proposed bridge over the River Stour, has escalated phenomenally. No developer is yet apparent to assist with its financing from an approved housing site with a new 22,000-vehicles-per-day road through its centre. Many of us pointed out the problem of this about eight years ago but to no avail.
- So called 'affordable shared ownership' housing provided on city council land by Hyde Housing Association is now available, but its full price appears to be about £100,000 above current market values. Added to which are a £990 annual service charge, leasehold title, difficulty of reselling and a second bedroom out of three that is too small for a double. How does this shared-ownership format persist?
- We had our moment of infamy recently. Private Eye alleged that two city councillors who stood down in May failed to declare an interest in a planning application where they stood to make a substantial amount of money. There has to date been no local press coverage of this or council comment.

## Dartford and Gravesend - Alex Hills

- I have been giving everyone a bit of a break as we have a major fight coming with the Local Plan Regulation 19 consultation due this month.
- Jackie Luckhurst and I have since November been fighting a social-housing application by Gravesham Borough Council to Gravesham Borough Council. During the planning process at no time has GBC followed best practice or exercised any due diligence - instead it has chosen to dance on the pinhead of legality to push this application through. This is despite 540 objections that were all made on valid planning grounds. The application has now been delegated to planning officers. I am waiting for a reply I wrote to the head of planning pointing out a number of measurement errors and possible legal breaches relating to the application.
- GBC is reportedly in financial difficulty, apparently affecting how it operates.

## Dover - Derek Wanstall

- With the new Dover District Council planning committee now in place, will it listen to the local electors who voted for change? Well, firstly this new committee turned down an application for a hotel at Betteshanger Country Park, which has been approved as a community asset within Sholden parish. However, before the decision notice was made out and signed, the application was withdrawn - we await any further information. I would like to thank Vicky Ellis of the Charing office for speaking at the planning meeting.
- In the Walmer and Sholden area there are approved applications for another 700-odd properties, while there is also a gradual increase at the large Whitfield housing site.
- There are now continual hold-ups in the Deal area at peak times due to the amount of development and work being out of the area. Town parking is also a problem, although the council says there is ample parking. Not so! The town supermarkets are often full and, with the amount of development to come, eventually there could at times be another 800 cars on local roads. The problem is exacerbated by many roads now being one-way systems due to on-road parking.

## Maidstone - vacant

- CPRE Kent was extremely disappointed with the decision of the Maidstone Local Plan inspector to allow the Plan to proceed to the main modifications stage. One of the key reasons for our disappointment was the inspector's choice to reintroduce an additional 85 houses north of Heath Road in Coxheath. These houses had previously been removed from the Local Plan due to public objections. CPRE Kent strongly believes this decision goes against the interests of the local community and will have a detrimental impact on the area's character. The removal of these houses by Maidstone Borough Council after public objection was a clear indication of the community's concerns. To see them reintroduced, disregarding local sentiment, was disheartening. CPRE Kent remains committed to fighting against this unsustainable Plan and made its views known once again during September's consultation on the main modifications.

## Medway - vacant

- No doubt many of Medway's councillors are disappointed at the withdrawal of their promised £170 million of government money from the Housing Infrastructure Fund (HIF). This money was intended to pay for the development of infrastructure to support up to 12,000 homes on the Hoo peninsula. CPRE Kent has been critical of these proposals from the start. The peninsula is a rural area including important nature sites and ancient woodland. HIF money should be spent on unlocking derelict and previously-used sites for housing, not for unlocking growth on high-quality agricultural land that is an oasis of dark skies and tranquillity in a deeply urban area. We urge Medway Council to rethink its plans, protect its environment and focus on regenerating its brownfield sites.

## Sevenoaks - Nigel Britten

- Given the acute housing need in the district, there were concerns that an appeal against refusal of permission for 70 houses at Brittain's Lane, on a site tucked in among housing on the north-west side of Sevenoaks, might not go our way. But it is Green Belt and adjacent to the AONB to the west and the inspector gave more weight to policy protecting them than to housing need. However, she raised worries for the future, saying it was highly likely Sevenoaks District Council would have to identify Green Belt sites in the new Local Plan to meet its housing target. The next consultation on the Plan is due in the autumn and we shall find out.
- The parish of Fawkham, a CPRE member, invited comments on its draft Neighbourhood Plan. Generally speaking, neighbourhood planning is a tool to manage development at the most local level. Fawkham is taking a different but also positive approach. Having established that there is no local housing need to be met, the Plan focuses instead on the valued assets that need to be conserved. It includes 'positive enhancement' projects, while some mention collaboration with CPRE.
- We already have enough trouble with ingenious dodges to get round Green Belt protection policy. For example, we reported on the loophole that allowed two twisted metal wrecks of former barns, with no proper access, to be made into an aparthotel. Now the government is consulting on possible extensions to permitted development rights for just such unwanted structures. Is this planning? What price countryside?

## Swale - Peter Blandon

- The process of producing a new Local Plan is, presumably, progressing. However, the last time that the committee charged with its preparation met was in February and since then all scheduled meetings have been cancelled. The next 'consultation' is a Regulation 19 one. The previous abortive Regulation 19 consultation consisted of a Plan by Swale Borough Council that bore virtually no relationship to the consultations that had gone before. As a result, it was successfully challenged by both developers and organisations such as CPRE Kent and the Regulation 19 Plan was withdrawn and replaced with a proper consultation. However, there is little indication of what the new Regulation 19 Plan will look like.
- It seems likely that those considering the Local Plan remain in favour of moving the balance of development from the Sittingbourne end of the borough to Faversham. However, given that Swale is unable to demonstrate a five-year land supply, it has become very difficult to argue successfully against applications.
- A depressing recent event was the success of Gladman's appeal against SBC's refusal to grant permission to build 135 dwellings at the Pond Farm site on the western edge of Newington on the A2. Several years ago, a similar application was refused and the ensuing appeal by Gladman was unsuccessful, due in the main to representations by CPRE Kent concerning air quality. In both the previous and recent applications, SBC did not contest the application on air-quality grounds. This is despite the fact that Newington, Rainham and Sittingbourne all have Air Quality Management Areas that the development will directly affect.

The appeal document stated: "The appellant provided further information relating to air quality and there was agreement on a package of air quality mitigation measures". Furthermore, the inspector argued that air quality, in general, was improving in the area and that predicted decreases in vehicle emissions would mean air quality would improve with or without the Pond Farm development.

- The four large-scale 'garden village' applications remain. These are:
  - Bobbing (2,500 dwellings) - outline application received.
  - Highsted Valley (up to 9,250 dwellings) - two sites, EIA scoping opinions sought.
  - Dunkirk (1,900 dwellings) - EIA scoping opinion has been delivered, so an application is awaited. Comments from the Woodland Trust and RSPB state that the two organisations are almost certain to object strongly should an application emerge. The site was assessed at being "unsuitable" in the Strategic Housing Land Availability Assessment conducted for the current Plan revision.
  - Faversham application by Duchy of Lancaster - consultations have been held. One of our committee queried the need for such a development and the reply from the Duchy noted (with the politeness one would expect from the organisation) that the charity "Shelter has reported that one in every 166 people in the area lacks a permanent home - the second highest rate in Kent. Currently, there are 1,318 people on the housing needs list, and Swale Borough Council spends 10 per cent of its annual budget on temporary accommodation. To compound the issue, Swale also has the highest level of temporary accommodation in Kent". We await a formal application.



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## Thanet - Peter Lorenzo

- This is my first report as chair of the Thanet district, having taken over since the sad death of David Morrish (see page 13). We all knew he was ill but hoped and prayed he would recover. That was not to be. He will be missed - him and his diatribes about planning and engineering.
- Having learnt about Sevenoaks district reaching out to its members, Thanet decided to follow suit through the Charing office. Although we have yet to receive the final results, our database has enlarged considerably from the secretary contacting just 12 people to my recent meeting where I was able to email an invitation to an additional 13 people. Since then, a few more have trickled in and will be added to the list. Of course, they did not all attend the meeting on July 18, but attendance was far better than previously and discussion far livelier.
- Among those present was Thanet councillor Ann-Marie Nixey. The district council had appointed her to our committee (at her request) and I think she will be a real asset to what we do. She was enthusiastic and sympathetic to the concerns expressed by members. She offered a venue in Ramsgate (for free) and has had a conversation with another councillor who is willing to offer Pierremont Hall in Broadstairs.
- With Richard Thompson and David Mairs from the Charing office I attended a meeting called by the Westgate and Garlinge Action Group as they wanted help in fighting a huge housing proposal of up to 2,000 homes and range of other buildings. Although the site in question is in the Local Plan, the land proposed for development by Millwood Designer Homes does not correspond to the area identified in the adopted Thanet Local Plan to 2031. The action group have managed to secure a meeting with the new leader of the council.
- I have asked members of the committee to study the county council's Emerging Local Transport Plan and send comments directly to me or CPRE Kent. It is a lengthy document, so I might be asking a lot of them. We shall see.
- I plan to reach out to parish and town councils in Thanet in the hope of greater working and cooperation.

## Tunbridge Wells - Peter Tavner

- Over the past months the committee, in conjunction with the county branch, has been active in opposing a significant development by Berkeley Homes of 165 dwellings on greenfield land at Turnden in the High Weald AONB. We were initially delighted when in April Michael Gove, Secretary of State for Levelling Up, Housing and Communities, refused the application, against the recommendation of the inspector, finding that Berkeley's proposals did not constitute exceptional circumstances justifying this major development in the AONB. However, our relief was short-lived when it was reported that Mr Gove had agreed to reconsider his decision in response to a threat of legal proceedings by Berkeley. A court order quashing the decision has now been made, by consent, thus returning the matter to the Planning Inspectorate. The procedure the Inspectorate will follow is not yet known, though we will continue our campaigning in opposing the development.
- The borough council continues work on the draft Local Plan and assessing the concerns raised by the inspector after the Examination in Public. We expect that the council will shortly be publishing a revised Plan with potential modifications, and again the committee will be active in reviewing any updates.
- The committee continues to review individual planning applications of concern and in particular is awaiting the outcome of a proposal for a solar farm in Capel. As stated in our last update, the committee remains stretched given the volume of applications and the scrutiny needed for the ongoing Local Plan. If any local members would like to volunteer and participate, their services would be warmly welcomed.

## Historic Buildings - John Wotton

- The committee met in April and July. Several issues were brought to the attention of the committee or discussed by members between meetings during the year. We have continued to review threats to heritage assets around the county, commenting ourselves or providing advice and assistance to district committees. The committee wrote to Tonbridge and Malling Borough Council about apparently unauthorised works at Grade II\*-listed Wrotham Place and received a helpful response. Members of the committee have assisted the county branch in responding to consultations on draft Local Plans around the county.
- The Gravett Architectural Drawing Award was made in June jointly to three students at the Kent School of Architecture and Planning. The judging panel was again chaired by Ptolemy Dean and I'm grateful to those committee members who took part in the judging, to Graham Horner for presenting the award at the school's end-of-year show and to Vicky Ellis for back-office support.
- Through the good offices of committee member Shelley Morris, we were able to visit Maison Dieu in Dover. This is the oldest of the town hall buildings and was founded by Herbert de Burgh, the Constable of Dover Castle in 1203. It was built to provide short-term accommodation to pilgrims travelling to the shrine of Thomas à Becket at Canterbury and for the care of wounded and destitute soldiers.
- We have welcomed a new committee member for Tonbridge and Malling, Chris Mills, but remain in need of new members, especially to cover Ashford, Dartford, Gravesham, Maidstone and Medway.

# 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.



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To find out more, contact  
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To learn more about leaving CPRE Kent a gift or to download our free will planner, visit:  
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## Lottery results



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

### April 23

Mr N Pearson £50  
Ms G Heywood £30  
Mr A Walker £20

### May 23

Mr L Wallace £50  
Mrs J Leffew £30  
Lady E Akenhead £20

### June 23

Mrs L Dowding £150  
Mr A Walker £50  
Mr L Wallace £20

### July 23

Mrs A Hone £50  
Mr M Loveday £30  
Mr R Stickland £20

### August 23

Mr C Catt £50  
Mr J Barrott £30  
Mr P Stevens £20

### September 23

Ms E Bura £50  
Mr P Stevens £30  
Mr R Stickland £20

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Kent

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

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TN27 0AD;

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

# Christmas cards

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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.

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The countryside you cherish is disappearing fast as greenfield land is swallowed up

Noise and light pollution are destroying the tranquillity of our countryside. We are fighting for a beautiful and thriving countryside that all of us can enjoy for generations to come.



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