



The countryside charity Kent

Highsted Park statement by CPRE Kent

15 May 2025

Good morning

My name is Julie Davies.

I'm a qualified Town Planner and Member of the RPTI.

For the majority of my career I've worked in Council planning departments in West Sussex and Kent.

I've been employed for the last seven years by CPRE Kent, where my role is to comment on emerging local plans and planning applications.

CPRE Kent made the conscious decision not be a Rule 6 party.

We thank the Inspector for allowing us the opportunity to make this verbal statement which provides a little more detail to the written representations we have made to date.

Who is CPRE?

We are well aware that CPRE is often accused by the development industry in the national press and planning blogs as being a bunch of NIMBYs. This is not true.

CPRE is NOT an anti-housing organisation.

As we approach our centenary year, the aims and objectives of what was then known as the Council for the Preservation of Rural England is as true today, as it was when the charity was founded in 1926:

"It is not intended to object to the reasonable use and development of rural areas; it is the abuse and bad development of such areas that requires restriction... It is not intended that the CPRE should be a negative force. It is part of its policy to promote suitable and harmonious development"

(‘The Aims and Objects of the Council’, 1926).

We are one of the longest established and most respected environmental groups in England

What are our objections to the proposed development?

You will already have read our original comments on both schemes (which were also attached to our additional representations in response to the call-in).

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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The proposed development at Highsted Park must be one of the most significant planning applications being considered in Kent at the moment.

We want to make sure our key points are heard and that's why we are here today.

As a charity the need for good, plan-led development is at the heart of our campaigning.

The current applications have completely side-stepped the plan-making process. This scheme doesn't take into account other options that may be available to the Council in addressing housing need. Development options of this scale should be tackled strategically, by the Council and not driven by speculative planning applications.

This scale of development should be tested through the local plan process.

Our case for today

As a campaigning charity CPRE does not object in principle to housing, it campaigns for the right housing – and in particular housing that is affordable – in the right place.

Others at this public inquiry will be speaking in detail about many of the issues set out in our original objections and written representations on the call-in.

For today's session we would like to bring the following specific issues to your attention:

- loss of best and most versatile agricultural land and food security;
- failure to provide sufficient affordable housing - you will have seen our detailed concerns about the poor provision of affordable housing and CPRE's research paper. This was attached as appendix 3 to our January 2025 written representation (Unravelling a crisis, November 2023);
- we endorse the landscape position taken by the council and the Kent Downs National Landscape unit – landscape impact sits within CPRE's wider aims of countryside protection. As the Inspector is aware, there is a new duty (s.245 of the Levelling Up and Regeneration Act 2023 amending s.85 of the Countryside and Rights of Way Act, 2000) to seek to further the purpose of conserving and enhancing the natural beauty of the area will need to be addressed in considering the merits of the proposed Highsted Park development. We are of the view that the Inspector/Secretary of State would be failing to meet this duty if this scheme is granted planning permission, particularly as it is accepted by everyone (including the applicant) that the proposal does not conserve or enhance the Kent Downs; and
- impact on tranquillity and dark skies (for nature and our own sleeping patterns/ circadian rhythms).

BMV and food security

We would like to draw to the Inspector's attention to the fact that the loss of best and most versatile (BMV) agricultural land appears to have been scheduled little discussion time.

The issue of BMV falls to be considered under part (g) of the Secretary of States call-in letter (CD51.1) with respect to the consistency of the proposed development with the development plan.

Likewise, although there is no specific reference to loss of BMV in the PIM letter (CD51.3) it does sit within the main considerations set about at points (b) and (k). That is:

(b) Whether the proposals would be consistent with the objective of building a strong, competitive economy and supporting economic growth and productivity and

(k) Whether the proposals would be consistent with the development plan.

The applicant appears to treat the loss of BMV with scant regard.

We're told in applicant's statement of case (CD33.1) at paragraph 9.21 that the loss of BMV is not unique to the proposals for Highsted Park, at paragraph 9.21 that only limited weight should be ascribed to the loss of BMV and at paragraph 9.23 that the benefits of the scheme will be shown to outweigh the loss of BMV.

I will set out my comments regarding affordable housing in due course, but it's worth noting here that seemingly not providing policy compliant affordable housing is a 'benefit'.

It is very confusing looking at the papers submitted as part of the planning application to determine exactly how much of each site comprises BMV (as hectarage) and as a percentage of the total site area. Perhaps this could be a matter that could be agreed as a Statement of Common Ground between the Council and the applicant, if it's not already been done. Is the applicant able to confirm today the extent of BMV land (in hectares) that would be lost if Highsted Park went ahead?

Starting with the local plan, we are told from highlighted Statement 3 (The importance of Swale's agricultural sector, page 77) that Swale has 37,000ha of land of which 23,000ha is farmed and approximately 15,000ha (around 70%) is classified as BMV.

From the applicant's statement of case (CD33.1) we are told at paragraph 9.20 (relying on paragraph 7.22.1 of the committee report (CD6.1) that 78.9ha of the northern site (that is 87.6%) is BMV.

For the southern site CD33.1 confirms that 88% of the site area is BMV, but no hectarage is provided.

In light of the latest version of the NPPF and the recent Government consultation on its proposed Land Use Framework, we're of the view that detailed consideration needs to be given to the loss of BMV.

The context for the consideration of BMV (and food security) lies within the following:

- NPPF paragraph 187(b) - economic and other benefits of the best and most versatile agricultural land;
- NPPF paragraph 188 (footnote 65) – poorer quality land first;
- Local Plan policy DM31 (paragraph 7.7.97); and
- CPRE publication Building on our Food Security, 2020 (this can be found at appendix 4 of our January 2025 written submissions).

It is our view that the importance of BMV considerations (and hence food security) should be considered in a more nuanced fashion, with reference to:

- Land Use Framework consultation; and a
- recent appeal decision in the Thanet district of Kent.

In its foreword to Defra's consultation on land use, it is stated that in publishing a land use framework and creating a toolkit, decision making will be supported "and inform discussion on how we can guarantee our long-term food security ... support development ... and achieve targets on nature and climate ... and support economic growth."

And that, in terms of delivering new infrastructure and housing the government set out that "we want to use strategic spatial planning to assess gains and losses against national and regional objectives, moving responsibility for managing land use trade-off away from individual projects."

This statement clearly sets the scene with regard to the emphasis being placed on the need for a land use strategy and for decisions affecting agricultural land to be weighed at the strategic level, once again underlining the need for plan-led development.

CPRE Kent has raised loss of BMV as one of our key objections to the proposed development. Swale is well served by BMV, with it accounting for approximately 70% of the borough (see reference to local plan statement 3 above). However, this wealth of land is in danger of being undervalued by virtue of there being so much of it, such that the whole – as part of the Garden of England - is seemingly being given less weight than perhaps other parts of the country which are not so well served with high quality land.

BMV is often referred to as being a constraint to development, as if the classification of agricultural land has been undertaken to thwart new housing building, rather than acknowledging that it is a valuable resource in its own right.

The same could be said for nature too. Ancient Woodlands are designated because of their innate value, protected species have protection because they are in and of themselves important. These designations aren't designed to flummox developers' options. New house building should be fitting around nature and BMV, where it currently exists. It should not be the other way around. The three pillars of sustainable development should be considered on an equal footing. Economic objectives should not be seen as being more important than social and environmental concerns.

On the subject of the natural world, we are concerned about the quality of the surveys undertaken and that mitigation measures (dormouse, badgers, skylark, curlew and great crested newts) are inadequate. With regard to great crested newts there is well documented evidence that they do appear in private gardens and in ponds on arable land.

The applicant is clearly of the view that (nature and) BMV is a nuisance. At paragraph 9.21 of his statement of case (CD33.1) he contends that the loss of BMV is not an issue unique to these two applications. It may well not be, but there is still a requirement for the applicant to address (and evidence) all parts of policy DM31. This does not appear to have been done.

It is our assertion that loss of a significant hectareage of agricultural land is significant and great weight should be applied to the policies seeking to protect it.

My best estimate is that about 570ha of prime agricultural land would be lost (being 78.9ha (northern site) + 85% of 577ha (southern site), although there is a discrepancy between the 73% set out at paragraph 1.16 of the committee report (CD12.1) and the table at paragraph 7.24.2 which says that 288ha of the site is BMV (85% of the site).

While CPRE has undertaken national research in terms of the growing loss of agricultural land (see appendix 4 of our January 2025 written submissions), for the Inspector's benefit I think it would be helpful to having an understanding of the scale of cumulative loss of agricultural land across the borough, and compare this to the significant loss that would result in the event that planning permission were to be granted for Highsted Park.

I have chosen the following sites because they been flagged by the applicant (although in relation to other issues). Their selection is intended to provide no more than a snapshot of a particular set of circumstances.

The applicant has in his opening statement (CD99.1.1) made reference to six recent appeal decisions (see under heading two - Swale has stopped planning) with respect to the Council's lack of a five-year housing land supply.

I make reference to all the sites for completeness, rather than missing out the sites that have no bearing on the loss of agricultural land through the planning application process.

I have summarised details of the appeals below, and set out in the key figures in tabulated form to enable a quicker comparison.

Barton Hill Drive (see footnote 11 to the applicant's opening statement)

This is a scheme for 700 dwellings at Barton Hill Drive on the Isle of Sheppey. It was allowed on appeal in March 2020.

A large part of the site was already allocated in the local plan (policy A12 allocated land for 620 dwellings). The principle of the loss of BMV was considered as part of the Local Plan process.

In terms of quantifying the loss of agricultural land the Extra-Ordinary Planning Committee report (23 July 2019) states (at paragraphs 6.03, 6.04 and 6.05) that the loss of 29ha was previously "accepted through the formal Local Plan process".

The additional land take amounts to a further 6.7ha, which is Grade3b and therefore not BMV.

Wises Lane

Permission was granted by the Secretary of State in April 2021 for 675 dwellings at Wises Lane, Sittingbourne (CD30.4)

The application site comprised 47.5ha (being the allocated land of 33.5ha (policy MU3) and an additional 13.8ha of BMV).

Paragraph 21 of the Secretary of State's letter states:

For the reasons given at IR11.34-11.37 the Secretary of State agreed with the Inspector that the development would result in the loss of best and most versatile agricultural land outside the allocated site (IR11.35). However, the Secretary of State (IR11.155) agreed that as the proposal would not adversely affect the viability of the remaining holding or result in the accumulated loss of Best and Most Versatile agricultural land, the proposal would not conflict with Policy DM 31. The Secretary of State agreed with the Inspector that this was neutral in the planning balance (IR11.155).

Swanstree Avenue

Planning permission was granted on appeal for 135 dwellings at Swanstree Avenue, Sittingbourne in May 2023 (CD30.3).

Paragraph 30 confirms that 4.3ha of BMV will be lost.

Reference to paragraphs 30-33 set out that there were alternative options for development.

The Inspector concluded at paragraph 34 that the evidence suggests there were alternative sites (1,700 units), within the built-up area, that would be suitable and sustainable, and which would be of a lower grade agricultural land than the appeal site. And that this would result in a material loss of BMV, and this is in itself harmful, even though this would result in the loss of only a very small percentage of the overall BMV land in Swale

And have a moderate adverse effect on agricultural land and conflict with policy DM31 (paragraph 35).

Church Road

Planning permission was granted on appeal at Church Road, Tonge for a mixed-use development comprising 380 dwellings in November 2023 (CD 30.2).

This 17.25ha (part urban/part BMV) site was allocated under policy MU2.

Ufton Court Farm

Planning permission was granted on appeal in July 2024 for 290 dwellings on land at Ufton Court Farm, Tunstall (CD30.1).

The site includes almost 9ha of BMV.

On the matter of BMV the Inspector's report concluded at paragraph 83 that there would be a conflict with policy DM31, but given the very small proportion of land affected (0.17% of 16,000ha) that only limited weight would be ascribed to the harm arising from the loss of BMV.

Reference was made to the issue of alternative sites as discussed at the Swanstree Avenue appeal.

London Road, Newington (footnote 16)

Planning permission was granted on appeal for 135 dwellings on land at London Road, Newington in August 2023.

The site includes 7.8ha BMV.

With regard to the effect of the proposed development on BMV the Inspector made reference to the issue of alternative sites as discussed at the Swanstree Avenue appeal. On this issue the Inspector concluded at paragraph 68 that development would conflict with policy DM31, with moderate weight attached to that conflict.

Scocles Road (footnote 17)

For completes this scheme is referred to here, but relates to 31.06ha of Grade 3b and is therefore not BMV.

It might be easier to set out this information in a table. I haven't appended any of the appeals as some are already available as core documents and the remainder, I assume, have been provided by the applicant.

	Loss of BMV (local plan allocation)	Additional loss of BMV	Appeal reference	
Barton Hill Drive, Minster (18/503135)	29ha		APP/V2255/W/19/3238171	
Wises Lane, Sittingbourne (17/505711)	33.7ha	13.8ha	APP/V2255/W/19/3233606	CD30.4
Swanstree Avenue, Sittingbourne (21/505498)		4.3ha	APP/V2255/W/22/3311224	CD30.3
Church Road, Sittingbourne (22/502834)	17.25ha		APP/V2255/W/23/3318509	CD30.2
Ufton Court Farm, Sittingbourne (22/505646)		9ha	APP/V2255/W/23/3333811	CD30.1
London Road, Newington (22/500275)		7.8ha	APP/V2255/W/23/3318448	
Scocles Road, Minster			APP/V2255/W/24/3356342	

(22/502086)				
		34.9ha		

The commentary above does not go into the detail of the cumulative impacts of the loss of BMV. Others have already addressed the issue of loss of BMV in the locality including land at the proposed solar farm at Pitstock Farm, Rodermersham; development at Froggnall Farm and the countryside/green gap at the Stones Farm development which is included within the application site boundaries.

However, as can be seen in the table overleaf, the loss of BMV land across this very limited number of sites amounts to 34.9ha. In each case the Inspector gave neutral/limited/moderate weight to the loss of BMV, which in the planning balance resulted in the granting of planning permission.

Whatever conclusions you draw about these sites, it is clear that the individual loss of BMV is considerably less than that being proposed with the Highsted Park development. This figure could be up to 570ha (and will need to be confirmed), but in any event will result in the loss of hundreds of hectares of BMV.

It remains our opinion that decisions around a development of the scale proposed – resulting in a significant loss of agricultural land – should be considered strategically, by the Council as part of the local plan process.

Having understood the extent of this snapshot of BMV loss, it would be helpful to set the consideration of the BMV issues with regard to the specific wording of Local Plan policy DM31.

Policy DM 31 Agricultural land

Development on agricultural land will only be permitted when there is an overriding need that cannot be met on land within the built-up area boundaries. Development on best and most versatile agricultural land (specifically Grades 1, 2 and 3a) will not be permitted unless:

- 1. The site is allocated for development by the Local Plan; or**
- 2. There is no alternative site on land of a lower grade than 3a or that use of land of a lower grade would significantly and demonstrably work against the achievement of sustainable development; and**
- 3. The development will not result in the remainder of the agricultural holding becoming not viable or lead to likely accumulated and significant losses of high quality agricultural land.**

For context, we know from Statement 3 in the Local Plan (Section 5: core planning policies, page 77) that Swale has 37,000ha of land of which 23,000ha is farmed and approximately 15,000ha (70%) is classified as BMV.

Policy DM31 stipulates that development will only be permitted in specific circumstances.

Those circumstances include where there is no alternative site on land of lower agricultural grade or that use of land of a lower grade would significantly and demonstrably work against the achievement of sustainable development.

My understanding is that the applicant is relying on the Inspector's conclusions with regard to BMV at Ufton Court Farm, which in turn refers to the Swanstree Avenue decision.

The Ufton Court Farm scheme relates to 9ha of BMV and the Swanstree Avenue scheme to 4.3ha. These are comparatively small parcels of land compared to the loss of what appears to be 570ha across one development comprising a total of 675ha: a large-scale, strategic development.

In accordance with local plan policy DM31, it would be helpful if the applicant could clearly set out how he can demonstrate that housing need cannot be met on land within built-up area boundaries.

In the usual course of events prior to allocating land for development, the Council would have undertaken a call for sites as part of its local plan preparation, so that a suite of sites could be assessed and then allocated according to need.

It is well known that site promoters rarely submit urban sites in these circumstances as they know that the principle of development is acceptable. It is the green field sites where the time and money is spent.

This underlines CPRE's point regarding the need for plan-led development which would bring with it a properly evidenced spatial strategy informed by a targeted call for sites to include brownfield land.

This sort of targeted call for sites is now being done locally by a growing number of local authorities around the county (including Canterbury City Council, Folkestone & Hythe District Council, Sevenoaks District Council and Tonbridge & Malling Borough Council).

We recognise that Swale is well served by BMV, but as previously stated the value of this resource should not be undermined because it is plentiful. The Garden of England plays a national role in the country's food security. The loss of BMV on this scale must be considered in the first instance through the proper plan-making channels and not through the piecemeal consideration of planning applications comprising, in this case, of 8,400 dwellings at a time.

Submitting a speculative planning application is just wrong for what is a significant, large-scale strategic level development.

Where are the checks and balances with regard to fitting a development of this scale into the Council's vision for the borough's spatial strategy? Where is the evidence that there's insufficient land within the built-up area?

As an unallocated site, criteria 2 and 3 of policy DM31 must be addressed. That is, are there alternative sites (for 8,400 dwellings) on land lower in grade than 3a? If as we know, there is 23,000ha of farmed land in the borough of which approximately 15,000ha is BMV, it must surely be deduced that approximately 8,000ha of lower quality land must exist within the borough (see Statement 3 in the Local Plan, referred to above).

Again, where is the applicant's evidence that within the 8,000ha of lower quality agricultural land across the borough there isn't a suitable site(s) for 8,400 dwellings?

It appears to be the applicant's case that Highsted Park constitutes a very small proportion of the overall BMV within the borough, and that limited weight should be attributed to the environmental and economic harm arising from loss of highest quality agricultural land.

However, we mustn't forget that 570ha of BMV will be lost, without (in the words of the Land Use Framework consultation) there being an assessment of the gains and losses at a strategic level.

We appreciate that there are a wide-ranging number of issues that will need to be reconciled in considering the merits of these planning applications, including the lack of a five-year housing land supply.

We will leave the issue of housing numbers for the Council to address in its evidence. However, we would like to draw to the Inspector's attention to an appeal which was dismissed in Thanet in February this year – which represents a more up to date position on BMV issues than the appeal decisions referred to in applicant's submissions to date.

An appeal was dismissed for 115 dwellings on land off Foxborough Lane, Minster on 10 February this year, despite there being a lack of a 5-year housing land supply. The decision is attached at appendix 1 (APP/Z2260/W/24/3351846).

The main issues included the impact of the development upon the resource of best and most versatile agricultural land. Paragraphs 20-26 relate to BMV.

- 80% of the site comprised BMV (paragraph 20).
- The appellant failed to undertake a sequential assessment approach advocated by the relevant local plan policy. In particular, it is noted that "the Inquiry was told this was because the LP states that approximately 91% of all land within Thanet is classified as BMV land and, as a result, the Council would have to seek

housing development on BMV in order to achieve the housing targets by default” (paragraph 23).

- The Inspector stated in response that this was “a generalisation and does not substitute for investigating site-specific circumstances to guide development ... there is a clear and accepted failure to justify the loss of BMV by not undertaking the sequential search required of policy” (paragraph 24).
- The Inspector concluded “that the proposed development would result in an adverse and unsubstantiated impact on the resource of BMV” (paragraph DM31).

At paragraph 74 the inspector concluded that “the harms of the proposed development would significantly and demonstrably outweigh the benefits” and that the proposal conflicted with paragraph 187 of the NPPF by failing to assess the economic (and other) benefits of the BMV (paragraph 73).

Affordable housing

CPRE campaigns for the right homes in the right place. This includes the provision of affordable homes. We continue to lobby the government and opposition parties with regard to amending the definition of affordable housing, so that it’s related to local incomes.

With regard to the current planning applications, we consider that planning permission should be refused because of the inadequacy in the proposed provision of affordable housing.

To this end we support the position taken by the council as set out in the report to planning committee in terms of the 10%/40% split between Sittingbourne and its urban extensions and the rural area.

However, it is the firm view of CPRE that if a local plan-scale development is to be considered outside the local plan process as a speculative planning application, that the applicant should make sure that the scheme is exemplary in terms of its benefits.

As set out above, in terms of the weight to be given to the benefit of affordable housing to justify the loss of what might be up to 570ha of BMV, so should that affordable housing be policy compliant.

We understand there is a housing crisis and particularly a crisis in affordability. But to allow a development that would unlock ‘some’ affordable housing would be unforgiveable, in terms of the land which will never be farmed again.

In seeking to boost the supply of housing and to see 1.5m homes built by the end of the current parliament the government has launched a number of initiatives – in relation to

schemes of comparable size to the Highsted Park development proposals – but, subject to a number of expectations.

There is the New Towns Taskforce. This is described as being an independent advisory panel (established September 2024) tasked with identifying and recommending locations for new towns to support the government to deliver the next generation of new settlements of 10,000 homes and more.

The government has stated that it has an expectation that these new settlements will provide a ‘gold standard’ of 40% affordable homes, with the government further stating that it wants exemplary development to be the norm and not the exception, so that communities feel the benefits of new development and welcome it (Ministerial Statement 13 February 2025 https://questions-statements.parliament.uk/written-statements/detail/2025-02-13/hcws452#:~:text=The%20government%20has%20been%20clear,and%20sustainable%20buildings%20and%20places.)).

On this issue the government’s direction of travel is clear. We concur with the view that the delivery of large-scale housing developments should be exemplary and that includes affordable housing at 40% across the board.

CPRE understands the need to boost the delivery of new homes, but this should not be at the expense of the under-provision of affordable housing or the lack of a properly evidenced justification regarding the loss of BMV.

If up to 570ha of BMV is to be set aside for development (in preference to sites within the built up area, or land of lower agricultural quality) then this should only be where the provision of affordable housing is prioritised.

It is strange that the applicant is unable to provide the full affordable housing requirement on this greenfield site. Or is the purpose of the scheme under consideration for housing to provide road linkages (at all costs)?

If the applicant is not able to provide basic development needs within the site area, then perhaps he’s in the wrong business. On the other hand, perhaps we should welcome the transparency afforded us by this admission, in the sense that usually site promoters will promise the earth to get planning permission. And then once the actual developer gets involved, the previous overambitious pledges are quickly swept away as Section 106 Agreements are renegotiated.

We’ve previously drawn attention to headlines in the local press demonstrating this exact point.

Rather than a 10%/40% split across the sites we would like to see 40% affordable housing provision across the board, referencing the New Towns Taskforce gold standard.

If swathes of the countryside are to be developed (in preference to brownfield first), this should only be under circumstances where the provision of affordable housing is prioritised.

This is clearly a vision also shared by government. The Levelling Up Act has seen the hope value element of compulsory purchase orders removed. The New Towns Taskforce and the New Homes Accelerator programmes have been published, the concept of grey belt has been introduced with its gold standard of 50% affordable homes. Each of these new powers demonstrates that this is the way that the boost in housing delivery will be powered. The old way of making speculative planning applications has become outdated, particularly in relation to viability ruling out the provision of affordable housing. Exemplary provision of affordable housing should now prevail.

The paucity of affordable housing being proposed at Highsted Park should be weighed heavily against the funding a road scheme, that at one point KCC said wasn't needed.

In closing our comments on affordable housing, I would respectfully draw to the Inspector's attention reference to a blog post on our website (as mentioned in our January representation) under the heading of 'Just who are we sacrificing Kent's countryside for?'

As set out in an article of the same name in the summer 2023 edition of CPRE Kent's magazine, Kent Countryside Voice, it is clear that developers are slowing down their build out rates because they don't want to be in a position of building at a level that over-supplies the local housing market, which would force them to reduce prices and profits. Instead, the trend is to build large family homes. What they are not building are the affordable homes needed for our existing communities. See article from pages 8-10 [Kent-Voice-Spring-Summer-2023.pdf](#).

In conclusion on this issue, we would implore the applicant to do the right thing in terms of a gold standard provision of affordable housing and if he can't get his books to balance, then perhaps he should leave it to the council to decide where new development should take place to meet its housing need through the tried and tested method of local plan preparation.

Tranquillity and dark skies

We have already set out in detail our concerns about the impact of the proposed development on dark skies and tranquillity, making reference to paragraph 198 of the NPPF and local plan policy DM24.

Without repeating the representations we have previously made we would like to highlight that tranquillity should be considered a natural resource. It should be recognised as an essential quality of the countryside – enabling us all to appreciate the

beauty and harmony of the natural world, including being able to take a peaceful walk or cycle ride in the countryside.

It is well documented that exposure to nature and better still, immersion in it, is good for our health and wellbeing. It reduces stress, improves our mood. Areas of tranquillity give us the chance to get away from the pressures of modern-day life and recharge our batteries. They should be thought of as part of our natural health service.

In placing weight on the relatively tranquillity of an area it should not be forgotten that our dark skies (and the extent to which they are affected by artificial light at night) also impacts on our health and wellbeing (particularly in relation to our sleeping patterns). Lighter skies at night have a disruptive effect on the natural world in terms of pollinating insects, bats and other nocturnal creatures, with predators making use of heightened light levels to hunt their prey.

We believe great weight should be placed on the health and wellbeing of local residents and the natural environment and that the relative tranquillity and dark skies of this part of the countryside should not be further harmed.

The applicant refers in his Tranquillity Overview (CD18.8 at paragraph 2.5) to CPRE's definition of tranquillity as the "quality of calm experienced in places with mainly natural features and activities, free from disturbance from manmade ones." And again, cites CPRE at paragraph 3.2 (CD18.8) with reference to the Jackson report of 2008 which was commissioned by the charity. Each time you read CD18.8 and mention is made of Jackson, it is the voice of CPRE that should be heard in terms of the concept of tranquillity (being the interrelationship between people, landscape and noise).

To conclude

We ask that the Inspector sets aside any preconceived notions that CPRE represents a bunch of NIMBYs and that it's an annoying little charity that always turns up to object to planning applications.

We are a well-respected environmental organisation which has published extensive research on affordable housing and is an organisation that clearly has such esteem that the applicant has referred to it on matters of tranquillity.

As you prepare to report on the merits of the proposed Highsted Park development we would ask the following:

- that you seek confirmation of the exact extent of loss of BMV;
- that you conclude that this loss represents more than the light/moderate weight attached to the issue of BMV loss than in relation to the appeals at Ufton Court Farm and Swanstree Avenue:

- that the applicant's lack of evidence of a sequential search for built up area sites and sites of lower agricultural quality be given great weight; and
- that provision of affordable housing, at less than the stipulated policy requirement, does not constitute a benefit outweighing the harm of BMV loss and in any event should meet government expectations of being exemplary.

CPRE's vision is of a beautiful and thriving countryside that enriches all our lives and is valued by everyone.

It is our position that planning decisions should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum (by adopting a brownfield land first approach) and that plan-led development is sustainable in accordance with national planning policy.

We believe that the planning system is a toolbox for achieving better – for people, nature and the economy – while supporting the delivery of badly-needed homes to end the housing crisis.

Accordingly, we say yes to development on brownfield land.

We say yes to the principle of affordable housing that is provided within an exemplary scheme at 40% across the board.

We say yes to the principle of development that has properly considered the natural world – with accurate survey work and responsible mitigation.

However, we say no to speculative development that is not plan-led, which evidences no benefit in terms of affordable housing provision, loss of BMV and the impact on the natural world and tranquillity and dark skies.

CPRE was formed in 1926 to seek to better the way the countryside is able to absorb development, whilst protecting it from urban sprawl, looking after our rural landscapes and seeking a sustainable future for our countryside and the rural environment.

For these reasons we ask the Inspector to recommend that planning permission for Highsted Park be refused.

Julie Davies
Planner
CPRE Kent