

Autumn-Winter 2024/25

# Kent Countryside *Voice*



## Hilary heads for the horizon

The end of an era as our director retires

## Cover your eyes?

What the new NPPF might mean for the countryside

## Biodiversity Net Gain

... is it really winning for nature?



The countryside charity  
Kent



The striking flash of red, white and black of a black redstart has enlivened many a walk around our coastline; the species breeds in small numbers in the county (Steve Ashton)

Cover: It's time to say farewell... retiring director Hilary Newport with just some of the CPRE Kent family (Paul Buckley)



# CONTENTS

Autumn - Winter 2024/25



**4-6**

I SAY GOODBYE...



**14-15**

CAMPAIGNS



**23**

GRAVETT AWARD

**7-8**

... AND I SAY HELLO

**16-17**

BON VOYAGE!

**24-25**

LOCAL PLANS: AN OVERVIEW

**9-11**

HOUSING TARGETS

**18-20**

SIX MONTHS ON... BNG

**26-29**

AROUND THE DISTRICTS

**12**

MEET THE PRESIDENT

**21**

FOR THE LOVE OF BADGERS

**30**

LOTTERY RESULTS

**13**

CHAIRMAN'S UPDATE

**22**

CATCHING A SHOWER

**31**

GIFT OF MEMBERSHIP

*contact us*

Please join us to help protect the countryside we all love - CPRE membership starts at just £5 per month.



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

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

Director  
General Manager  
Planning team

Dr Hilary Newport [hilary.newport@cprekent.org.uk](mailto:hilary.newport@cprekent.org.uk)  
Vicky Ellis [vicky.ellis@cprekent.org.uk](mailto:vicky.ellis@cprekent.org.uk)  
Julie Davies [julie.davies@cprekent.org.uk](mailto:julie.davies@cprekent.org.uk)  
Richard Thompson [richard.thompson@cprekent.org.uk](mailto:richard.thompson@cprekent.org.uk)  
David Mairs [david.mairs@cprekent.org.uk](mailto:david.mairs@cprekent.org.uk)

Campaigns and PR Manager





# I say goodbye...

After more than two decades, **Hilary Newport** is retiring from her role as director of CPRE Kent. Here she looks back over her time “in the best job ever” before heading off on her narrowboat and Britain’s inland waterways.

Full steam ahead: ‘I plan to be vastly increasing my annual mileage on Britain’s inland waterways’

**I moved to Kent from Oxfordshire to Kent in 2002 when my husband Peter accepted a job at Pfizer’s Sandwich plant. Rather than juggling two houses and weekend commuting, and feeling a bit stale in my existing job, I took the plunge and handed in my resignation in order to move house and look for a new job in the deep south.**

After a couple of pretty bleak months of job-hunting, I recall being on my way home from an interview in a packed train on a grubby November evening, gloomily contemplating the prospect of a job that would require a regular commute into London. That was when I got a text from my husband that said “There’s a job advertised in The Guardian that you really ought to apply for”. And that was how I found out that the Kent branch of CPRE, having received the news that a large legacy was in the pipeline, was advertising for a new director.

At first I didn’t think I would be a good fit: my background first in biology and then consultancy in environmental legislation seemed a long way from what I was rapidly learning about CPRE. I knew how to help businesses

clean up, green up and save money by minimising waste and energy use, all while learning how to comply with increasingly strict environmental legislation. And although I have always loved the countryside, I certainly didn’t know any more about planning than what I had gleaned from a couple of undergraduate lectures.

Slowly, however, the realisation dawned that both jobs were fundamentally about sustainability, defined as ‘meeting the needs of the present generation without compromising the ability of future generations to meet their own needs’. Avoiding needless industrial pollution and ensuring necessary development is carried out in the least damaging way are not so different after all.

I set out for interview determined to make that point and found myself faced with an intelligent and engaging panel of interviewers: Hilary Moorby, then chair of CPRE Kent, Keith Johnson, Alan Holmes and Gary Thomas, all of whom became great friends and all now sadly deceased, plus Kate (now Baroness) Parminter, who in 2002 was CEO of national CPRE. All five of the panel were engaging, interesting and clearly passionate about what they did.





I was immediately hooked and realised this was a role that I too could be passionate about.

Almost 22 years later, I am so glad I didn't end up as a London commuter.

There have been so many highlights over the years in CPRE Kent. I had barely settled into the job when the phones began ringing off the hook after John Prescott's policy announcement of growth areas, two of which would be in Kent (Ashford and the Thames Gateway). Local and national news channels were eager to hear what CPRE Kent had to say about the proposals.

I watched and learned while Hilary Moorby deftly handled challenging press interviews and I gradually learned to get CPRE's campaign messages over to the media, too. I was there when national media descended on Ingress Park (Dartford) while Tony Blair and Prescott were helicoptered in to announce the 'kick-start' to their building boom in the South East.

So many of the issues we have faced since 2003 have been precipitated by the constant attempts to 'kick-start', ▶



To the manor born... Hilary was CPRE Kent director for almost 22 years



'reboot', 'remove the drag anchor' or, memorably in 2020, to 'rip up and start again' the planning system.

It's a great shame that so many of these proposed or actual changes have been driven by the idea that building more houses will bring the price of all new houses down - there are so many reasons that doesn't work. Delivering the affordable housing that communities in the South East really need will never be achieved by opening the floodgates to the big developers to build as many high-profit greenfield homes as they choose to. Nevertheless, it seems the pressure to build more and more, without addressing the underlying needs of real sustainability, will continue.

Alongside the unrelenting pressures of national planning policy, I will keep so many memories of other challenges focused specifically on Kent, not least the white-knuckle ride that was the legal battle to protect an AONB site at Farthingloe from intense development. This took two hearings at the High Court and a final challenge at the

Supreme Court until we were able to establish, in law, the important principle that, simply put, it's not OK for a planning committee to wilfully decide to allow development to cause significant harm to a designated landscape without having jolly good reasons to do so.

Then there was our involvement in the David-and-Goliath battle between the village of Wye and Imperial College, spearheaded by (now our very own) Ben Moorhead, which saw off the attempt to build 4,000 homes in the AONB at Wye. We waved goodbye to the prospect of an airport at Cliffe, and the risks of fracking in east Kent, and a lorry park the size of Disneyland at the foot of the Kent Downs AONB.

Many of the memories are great fun, too: a spectacular fundraising dinner addressed by Sir Donald Sinden, an open-air showing of Monty Python and the Holy Grail in the extraordinarily beautiful grounds of Leeds Castle (another fundraiser) and a garden party hosted very generously by Hever Castle to bring together CPRE branches in Kent, Sussex and Surrey to celebrate national CPRE's 90th anniversary and highlight the impacts of noise pollution from Gatwick on a unique historical asset.

Naturally, I didn't do any of this alone. I've worked alongside and learned from so many remarkable people: too many to mention but all remembered with fondness. It's been a privilege and a pleasure.

I am proud to be leaving CPRE Kent in great hands and I'm happy that it's time for something new for me: I plan to be vastly increasing my annual mileage on Britain's inland waterways, something I've loved doing since I was four years old.

I wish Andrea every success in her new role and I hope that she will enjoy working alongside colleagues, trustees, volunteers and members every bit as much as I have.

**Thank you to everyone for the past 20-odd years of the best job ever. ■**



From top: The Farthingloe saga brought CPRE Kent, and Hilary, a lot of media attention; Hilary is never happier than when on her narrowboat; by royal appointment... Hilary with CPRE Kent's Susan Pittman at a Buckingham Palace garden party





# ... and I say hello

**Andrea Griffiths** is the new director at CPRE Kent. Here she talks to **David Mairs** about her passion for wildlife, the importance of our charity's independence and the 'nimbyism thing'.

**Following the footsteps of someone who has served some 22 years in the top job at any organisation could potentially be a daunting prospect, but Andrea Griffiths shows no sign of trepidation as she assumes the role of CPRE Kent's new director in the wake of Hilary Newport's retirement.**

Already living in the county (on the edge of the Hoo peninsula) is an obvious advantage, while 20 years' experience working in countryside management means our charity's world is not wholly unfamiliar.

Andrea moved to Kent in 2000 when she and her partner decided to make the move from Cleveland in north-east England. How has she found Kent?

"I've always loved it," she says. "But I worry more and more about the levels of development."

Andrea joins us from the Medway Valley Countryside Partnership, where she was the manager. While managing

the team, her speciality has also been in understanding the impacts of and controlling non-native invasive species. She has also been involved in a myriad of habitat-creation projects, most recently for great crested newts, and has done a lot of herpetofauna surveying and monitoring.

### **What's prompted her switch to CPRE Kent?**

"I come from a habitat management background and have an understanding of ecology. I'm incredibly passionate about wildlife, but I'd be helping to create a small pond or plant a hedgerow and there'd be this massive development going on just over there - and I started to wonder if my work was making a big enough difference. While I'll miss my ponds and surveying for newts, working for CPRE Kent will be about protecting the countryside and its wildlife in a different way. It might be nice to do some more edgy stuff - I suppose those are the reasons behind the move."

While those of us involved with CPRE know what we're ▶





Andrea has been involved in a lot of amphibian and reptile surveying and is licensed to handle great crested newts

about, it's always illuminating to learn how other countryside organisations see us.

"I think I'm being accurate in saying CPRE is mostly about protecting the countryside from inappropriate development. Yes, we have a housing crisis, but we also have a biodiversity and climate crisis, too. Where I live, all we're seeing are four- and five-bedroom houses going up on greenfield sites and most people couldn't afford them."

It's a familiar refrain across the county and, although it's something that CPRE Kent has never been afraid to highlight, it's perhaps time to ramp up the message to those struggling to afford a home: 'We're on your side!'

It would be a perfect foil to the tiresome and inaccurate taunt of 'Nimbys!' whenever we have the audacity to raise an objection to an environmentally damaging scheme or highlight quite the levels of development to which Kent is being subjected.

And it's a charge of which Andrea is already aware. Asked how friends and colleagues had reacted to the news of her

move to CPRE Kent, she says: "Some were quite surprised - there's this nimbyism thing. But we must be prepared to say 'This shouldn't be happening - it's the wrong site'. Someone has got to stick up for our environment and demand best practice."

That's something CPRE Kent has done for many years - sometimes with great effect - but it's a crowded marketplace in the world of environmental organisations and charities. How do we stand out against the rest?

"I think the difference is CPRE's ability to campaign against the big developments and make an impact. Coming from the Countryside Management Partnership family, there wasn't the scope to do that, largely because they're hosted by local authorities that might themselves be involved in certain developments. The independence of CPRE Kent means we can campaign more actively."

It might have been a slightly unfair question to ask someone before they had even started the job, but how does Andrea see CPRE Kent evolving?

"More of the same, essentially. My current main concern is Sea Link and I'm very keen on the campaigns to have solar panels on roofs and the need to target development largely at brownfield sites. I'd also like to see more emphasis on the water quality of our wetlands and rivers."

While Kent has a wider range of habitats and landscapes than most, we also know that few other counties are under the builder's cosh to quite the same extent. What does Andrea see as the greatest threat to our countryside?

"It's development, isn't it? It's everywhere we look. There are lots of pressures mounting up and development might be the proverbial final straw. I'm passionate about wildlife, but habitats will become even more fragmented than they already are, further affecting our wildlife and resilience.

"We need to implement Lawton's 'bigger, better and more joined-up' principle and many developments are undoubtedly countering this effort. I also worry about our future food security and water availability. There's also a lack of pride in our countryside - just look at the amount of flytipping we see!"

So that's the negative, but what does Andrea like most about rural England, which of course is the essence of this charity's role?

"The countryside - that's where I'm happiest. When I'm not working, I'm tramping across the downs or through an ancient woodland. I love trees!"

#### **And when working - what will be her role at CPRE Kent?**

"I have a history of partnership working and I think a big part of my role will be to collate, network and bring people together, to help complete the jigsaw for bigger reach."

So many at CPRE Kent share Andrea's passion for our countryside, but the pressures are monumental and the job ahead is a big one. Let's go! ■



Are such developments really sympathetic to our landscape?

# HOUSING TARGETS DO NOT BUILD HOUSES

We need proper planning, not speculative sprawl, says CPRE Kent's **Richard Thompson** as the county prepares for a huge hike in building should proposed changes to the NPPF come to fruition

The newly-elected Labour government delivered swiftly on its campaign promise to reform the planning system, beginning a wide-ranging consultation on proposed changes to the National Planning Policy Framework (NPPF). And with the timing set just before the summer holidays, it's clear it is eager to get moving.

While the sheer breadth and detail of all the changes are far too extensive to cover here, at the heart of the reforms is a massive increase in housing targets being imposed on Kent, along with an increased compulsion on councils to grant planning permission if these targets are not being met. The current protection currently afforded to those areas subject to a Green Belt designation will also be greatly reduced.

Focusing on Kent, almost all our council areas would see increases in housing targets under the new system, with a countywide housing target increase of 1,438 per year. Some of these hikes will be massive, such as Sevenoaks, which sees its target increase from 704 to 1,113 houses a year, a 58.1 per cent increase. When you consider that 93 per cent of Sevenoaks is within the Green Belt, the potential impact of these proposed changes is clear.

One reason the largest increases will occur in areas like Sevenoaks is due to the proposed method, where the bigger the gap between average house prices and average earnings, the higher the housing target will be relative to the existing number of homes. Although the current calculation method has a similar approach, the new proposal significantly raises this correlational increase and removes the upper cap that previously limited the extent to which the final target could rise.

The potential impact of these higher targets becomes even more apparent when you consider that, despite new housing developments seemingly springing up overnight across the county, the current level of housebuilding in Kent falls far short of meeting these newly-proposed targets. In fact, and as shown in the chart overleaf, some 4,909 extra houses would need to be built in Kent each year to meet the new requirements. Using Sevenoaks again as an example, the district would need to increase the number of houses built each year by a whopping 323 per cent to meet the new target.

What is the rationale for increasing the targets by such a degree? In part, it seems the idea is to force councils ▶



to grant more planning permissions to allow more housebuilders to build more quickly. Linked is the idea that if more permissions are given, then more affordable houses will be delivered and market housing will become more affordable via the concept of simple supply and demand.

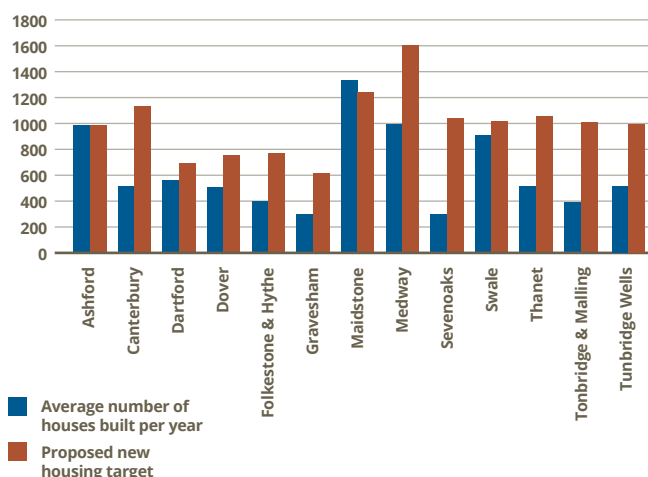
Except we know that this thinking is flawed.

Firstly, there are already numerous planning permissions and Local Plan allocations in place that could be progressed immediately. Specifically, permissions have been granted, or Local Plan allocations identified, allowing for the construction of some 55,115 houses across Kent in the next five years. In addition, there are many more housing sites identified in Local Plans that are not expected to be developed for at least five years.

There are some very genuine reasons these permissions are not being built out as quickly as intended. For example, there are thousands of planned houses within the Stour catchment area that remain blocked from being built because of the Stodmarsh National Nature Reserve nutrient-neutrality issue (see the Autumn-Winter 2023/4 edition of this magazine for more on this).

There is also now a significant issue that Registered Providers, those who usually buy and operate the affordable-housing element of large housing developments, are saying they can no longer afford the prices being asked by developers for the affordable housing. This is leading to stalled sites and attempts by developers to renegotiate the affordable-housing terms

Housing built per year compared against new housing target



as agreed under the original planning permissions.

Further, there is the inconvenient truth that private housebuilders are simply not going to build at a level that over-supplies a local housing market, forcing them to reduce prices and lower profits.

This concept, known as the absorption concept, is an issue about which I have written before and is seemingly accepted across the planning industry. It is therefore disappointing to see that not only will the method for calculating housing numbers continue to be linked to the concept that higher targets alone will eventually equate to more affordable housing but that the new calculation seemingly doubles down on this idea.



Sevenoaks district has some very special places (this is Knole Park)... how many of them will survive the ravages of the new NPPF? (Kate Lake)





'When you consider that 93 per cent of Sevenoaks is within the Green Belt, the potential impact of these proposed changes is clear'

These are problems that go beyond the planning system and need to be tackled at the national level. However, under the reforms it will be local councils that are punished if the targets are not met.

Specifically, it is proposed to reintroduce the requirement for all local authorities to always demonstrate they have five-year supply of houses, regardless of whether they have a recently adopted Local Plan or not. They will also need to find an additional 5 per cent on top of the new housing target to ensure they have a sufficient 'buffer'.

Those councils that cannot demonstrate a sufficient supply of houses or fail the Housing Delivery Test will be subject to what is known as the presumption in favour of sustainable development, which effectively is a requirement for all speculative planning applications to be assessed from the starting presumption that planning permission should be granted.

With respect to Green Belt policy, the exceptional circumstances whereby speculative development may be permitted is proposed to be expanded to include "instances where an authority cannot meet its identified need for housing, commercial or other development through other means". This is a significant shift from the existing version of the NPPF.

Within the consultation, the government recognises that introducing more demanding targets and reinstating the requirement to demonstrate a five-year housing-land supply at all times is likely to bring more local planning authorities into the scope of the presumption in favour of sustainable development. However, it deems this "necessary to ensure that we urgently address the issue of chronic undersupply of land that has underpinned the housing crisis and support our drive to deliver 1.5 million new homes over the next five years".

And therein lies the heart of the problem with the current consultation. Increasing housing targets alone will not build houses. There will need to be far more significant government interventions to get anywhere near the targets. Even the development industry is saying there will not be the bricks needed or we don't have the skilled labour necessary to achieve the level of housebuilding required to deliver these targets

Punishing councils and the communities they serve because completely unrealistic housing targets are not met by housebuilders, for reasons outside the control of local councils, is not the answer. All that reinforcing the presumption will achieve is an emboldened development industry cherry-picking the most profitable types of development and sites - these are often the least sustainable housing sites, for example low-density executive properties on greenfield areas.

While CPRE Kent fully agrees that more affordable homes are needed, they must be provided in ways and locations that benefit people, the environment and the countryside as a whole. The push to build houses at seemingly any cost presents a significant risk of placing developments in the wrong locations. We are already seeing this in Kent and fear this is only going to get worse should the reforms go through as proposed.

Instead, we need a proper Plan-led approach to make sure homes and infrastructure are delivered together. We need a national land-use plan and the reintroduction of planning beyond the local strategic level. These changes might be coming as part of future reforms, but by rushing ahead through increasing housing targets before getting these important bits of the puzzle in place is extremely shortsighted.

All this will achieve is the inevitable rush of further speculative development and the conflict that comes with it. And again it will be Kent's countryside that is paying the price. ■



Two solar-farm proposals in and around Aldington have drawn Jonathan back into his old 'utility world'

# Meet the president

**Jonathan Tennant** prepares for the challenges that will keep 'those little grey cells ticking over'

**We are pleased to announce that Jonathan Tennant has agreed to become CPRE Kent president - and here he is to introduce himself:**

"I am a retired Rural Practice Chartered Surveyor and have spent most of my working life as a land agent in Kent.

"After completing the estate management course at Cirencester, I started working with Cluttons in 1982, initially in their Bath and Wells offices but latterly in Canterbury. For more than 20 years, I was involved in all aspects of the management of privately and institutionally owned agricultural estates.

"However, soon after moving to Canterbury, one of my first jobs was for a Kent water company and from this grew my interest in the rather niche sphere of acting for utility companies on projects where they required expertise in the acquisition of land and rights over land.

"This work developed to the point where I and two other Cluttons employees decided we should take the plunge and establish our own company specialising in this area of work - deciding from the outset that we would act only for utility companies and never against them!

"As a result, the first half of my career had its roots in rural estate management, while the second half drew me into compulsory purchase, planning and a wide range of compensation work. Needless to say, promoting utility schemes across private land is seldom an easy ride and inevitably negotiations with landowners soon became part of my stock in trade!

"I have had a long association with King's Canterbury, where for a time I sat alongside CPRE Kent chairman Ben

Jonathan Tennant:  
'Delighted and honoured to be taking on the role of CPRE Kent's new president'



Moorhead as a governor. I remain a retired member of the Kent Valuers Club - a branch of The Central Association of Agricultural Valuers - which usefully keeps me in touch with the commercial goings-on in the countryside.

"I have lived all my life in the country and grew up in east Devon. Despite having now lived in Kent for 35 years, I am of course still adding to my knowledge of the countryside - particularly songbirds, butterflies and trees, in which I have a strong interest. I enjoy writing poetry (I am a member of the Betjeman Society) and watercolour landscape painting. Having now retired, I am able to enjoy these things all the more! My wife Cootchy and I have two grown-up children and a grandson.

"By force of circumstance, since retirement, I find myself being drawn back into my old 'utility world' on account of two huge solar-farm proposals in and around my home village of Aldington. Whilst challenging these schemes takes up valuable retirement time, I have to concede that it also keeps those little grey cells ticking over!

"I am both delighted and honoured to be taking on the role of CPRE Kent's new president. I very much look forward to working with and supporting the Kent team in what is quite clearly going to be a changing planning environment for our countryside - while at the same time getting those grey cells working harder still!" ■





# Chairman's Update

## Ben Moorhead

The pressure on our county has been relentless... and it's not likely to ease any time soon

**CPRE Kent has been working incredibly hard in the face of very tough challenges and against a background that in Britain has witnessed two million acres of grassland and woods lost to development over 25 years, including playing fields. This is an area the size of Suffolk and Sussex combined. Is this progress?**

At the same time there was an additional increase of more than 830,000 acres in urban development - an area the size of Cornwall. This scale is not sustainable, especially when coupled with a huge increase in flytipping, littering in woods and water pollution.

You won't be surprised to learn that the biggest increase in urban sprawl was... in Kent. We saw an increase of 33,600 acres of built land from 1990-2015, followed by Essex and West Yorkshire.

And now, after the past devastation faced by Kent, we see the harsh reality of the government's new NPPF (National Planning Policy Framework). Our own planner Richard Thompson, chairs and trustees, working with CPRE national office, have in the consultation sought to amend and push back on the text of the new policy. We wait to hear how this will turn out, but, whatever happens, there will be mandatory housing targets.

We also look for a brownfield-first policy. Most probably Green Belt and so-called grey belt will be built on, with the government wishing to change the Green Belt boundaries to enable more housebuilding.

Kent has Green Belt, while 13 per cent of England's land is Green Belt, circling 16 urban cores. To some extent, they are the lungs of our cities. Sir Keir Starmer wishes to build on the 'ugly parts' of the Green Belt or grey belt, which is of course very subjective.

Will the rest of the Green Belt remain sacrosanct? Probably not, as Labour says it will not build on 'genuine nature spots'. So not much comfort. And ministers can change the NPPF without a vote - so no need to change the law or to adopt democracy.

Commentators say that 100,000-500,000 houses could be built on grey belt, but government wants 1.5 million houses in five years. While some pressure may be taken off county targets, the demand will remain huge, not least in Kent, which is a heartland for housing and solar schemes.

My role is to help steer CPRE Kent to a strong place where it can fully and properly fulfil its role with a strong staff and to maintain our funding into the future.

CPRE national sponsored a scheme this year whereby it provided certain counties professional marketing

officers for a few days. We were allowed this at the Kent County Show. The results in terms of new members are still being evaluated.

CPRE Kent is eternally grateful for the work and steerage of our director, Hilary Newport. Her name is synonymous with CPRE Kent and vice versa. We are so lucky to have had her in our midst for over 22 years. She is kind, clever, industrious, approachable, creative, concise and we owe her everything. Thank you to her.

Thank goodness she took the job in 2002 and not the job with the Royal Institute of Chartered Surveyors. We are very grateful for her agreeing to extend her tenure a bit to cover the notice period of her extremely able successor, Andrea Griffiths, whom I hope many of you will welcome at our AGM.

I am deeply grateful for the work of all our executive team for their work over the last year, including Richard, Julie, Vicky and David, the last of whom produces all our wonderful publications. I am grateful to the local chairs and committees and to our trustees, all of whom are volunteers.

Some of our greatest challenges over the year have been at Aldington, Ash Level, Betteshanger, Canterbury, Minster Marshes, Faversham, Maidstone and Sevenoaks. There will be more time to discuss these at November's AGM. ■





# Campaigns

## How CPRE Kent fights for our rural environment across the county

### **Hoad's Wood**

The case of Hoad's Wood attracted substantial media coverage at both local and national level, with CPRE Kent heavily involved in efforts to highlight a growing problem in the Kent countryside.

Some four acres of the wood, near Bethersden, had been wrecked by the illegal dumping of landfill waste, causing campaigners to demand government approval for a £10 million budget for full clearance of the site and its replanting with native species.

In April, Rescue Hoads Wood, CPRE Kent, Kent Wildlife Trust, the RSPB, The Woodland Trust, South East Rivers Trust and CLA South East (Country Land and Business Association) wrote to Steve Barclay, then-Secretary of State for Environment, Food and Rural Affairs, asking him to sanction the release of emergency funds to begin the clean-up.

The following month, MP Robbie Moore replied on behalf of Mr Barclay to confirm that the Environment Agency had been asked how it intended to tackle the issue, which was also raised in the House of Lords by Earl Russell.

And on Thursday, May 23, a ministerial direction was published on the government's website, GOV.UK, ordering the wood be cleared of waste. Although the campaign groups had called for funds to be released from the Treasury, the order said the cost of the operation was down to the EA.

It had been hoped the EA would have begun clearance operations by Wednesday, July 31, at the latest, but lack of evidence of any such work prompted legal action from Rescue Hoads Wood, which instructed legal counsel Leigh Day to send a letter to the EA in a bid to get it to commit to a concrete timeline to clear the site.

The letter appeared to focus minds, the EA responding with the assurance that it would indeed clear Hoad's Wood. However, it also said the ministerial directive did not stipulate a timeframe for clearance and it would follow its own process.

In turn, Rescue Hoads Wood asked Leigh Day to follow up with a message to the effect that if the clearance did not start by Monday, October 28, it would consider escalating with formal legal proceedings.

Happily, it can be reported that the EA has launched a tender process to find a contractor. This went live on Monday, September 16, and it is anticipated that award of contract will have been made and clearance started on October 28.

### **Winterbourne Farm**

While CPRE Kent comments on numerous planning applications across the county, even we were taken aback by the proposal for up to 1,815 dwellings at Winterbourne Farm, Dunkirk.

Not only is the proposed site in a completely unsustainable and isolated location but it is also almost entirely enclosed within the Blean Ancient Woodland.

Thankfully, Swale Borough Council has already recognised the site's inappropriate location in rejecting it at the earliest stage

during the previously aborted Local Plan site-selection process.

In the 2019 Local Plan SHLAA (Strategic Housing Land Availability Assessment) process, the council assessed that:

"The site is physically separated from it (Dunkirk) by the A2 and in any case Dunkirk is a very small village. The site would give rise to clearly isolated homes in the countryside. Furthermore, Dunkirk has extremely limited services, facilities and employment opportunities. Although the neighbouring settlement of Boughton has a better range of everyday services, it still does not amount to a local service centre and travel would almost certainly be required into the surrounding towns, most likely by car. As such, and despite the more relative sustainability of nearby Boughton, the site is considered to be in an unsustainable location which is not suitable for residential development."

These facts remain unchanged.

This proposal is opportunistic, seeking to exploit the stalled Local Plan process within the Swale borough and the confusion in national planning policy. The site promoter appears to be taking advantage of the site's politically convenient location on the administrative boundary, away from a sizable voting population within the borough. This cannot obscure the fact that this site is an extremely poor spatial planning choice for Swale. Its location means it will be almost entirely car-dependent, with limited potential for internal trip generation. If this isn't bad enough, its location enclosed within ancient woodland will inevitably cause environmental and ecological harm.

This application should be refused immediately to prevent the site promoter from building momentum behind it as a serious contender for the upcoming Local Plan consultation. Moreover, this application must be refused to protect the countryside and maintain the integrity of Swale's spatial planning strategy. CPRE Kent made a substantial response to the application.

### **Sea Link**

The third round of consultation on National Grid's Sea Link scheme ended in August.

The fight to save Minster marshes and Pegwell Bay from the ravages of the environmentally damaging proposal has been kept in the spotlight with public meetings and an impressive social-media effort.

CPRE Kent's own Peter Lorenzo, chairman of our Thanet district committee, chairs the Save Minster Marshes group, which has set up meetings in and around Minster highlighting quite how damaging the Sea Link proposals are.

They entail the development of an underwater electricity link between Suffolk and Kent with onshore converter stations at either end - it is feared the proposals could prove disastrous for wildlife.

The project document says the link would make landfall in Kent at Pegwell Bay, part of Pegwell and Sandwich Bay National Nature Reserve, where 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 that the cumulative effects assessment is undertaken robustly.

Save Minster Marshes has engaged a barrister through the English Law Foundation on a pro bono basis and had been due to meet him to discuss the options.

### **Lower Thames Crossing**

This scheme labours on with still no decision announced.

Its fate had been due to be determined on Thursday, June 20, by the Secretary of State for Transport, but the date fell within the election campaign so the announcement was postponed. A new date of Friday, October 4, was declared, but all we got that day was a Department for Transport statement informing us that an update would be given "in due course". And three days later, the DfT and transport secretary Louise Haigh revealed the decision on the Development Consent Order would be extended further to Friday, May 23, 2025, "to allow more time for the application to be considered further, including any decisions made as part of the spending review".

Surely this time...

### **Betteshanger Country Park**

The development by Quinn Estates of a 120-bed hotel and spa, together with a leisure complex including surfing lagoon, pools, a hub building and 15 holiday pods, has been formally granted planning approval by Dover District Council.

This came as a blow to CPRE Kent, who, alongside the Friends of Betteshanger, the RSPB, Buglife and Kent Wildlife Trust, had mounted a strong campaign against the environmentally damaging development. See page 26 of this magazine for more on the decision by the local authority.

### **Highland Court**

CPRE Kent was extremely disappointed with the judgement in the High Court regarding the Chapel Down application to build a huge warehouse (or 'winery') in the Kent Downs National Landscape at Highland Court, near Canterbury.

Judge Alice Robinson acknowledged the misleading advice given by officers of Canterbury City Council to CPRE Kent, noting the stark and muddled approach that had misled us.

The judgement, announced on Friday, May 24, confirmed a breach of the council's constitution, which directly impacted CPRE Kent and Natural England, leading to us being unable to speak at the crucial planning meeting where the application was approved. However, despite recognising the clear breach

of the constitution, Judge Robinson concluded that it did not result in material prejudice.

CPRE Kent believes this permission will lead to the industrialisation of an area of countryside with specially protected status that should be conserved. There are numerous other locations where such a large-scale development could occur without causing irreparable harm to our precious countryside.

We had earlier taken legal advice and considered challenging the decision by CCC in July 2023 to grant permission for the winery but concluded it was not a challenge we could realistically take on ourselves.

We were pleased, therefore, when another party stepped forward to take the decision to judicial review. That party has since applied for permission to appeal May's High Court verdict.

### **Turnden**

We are still awaiting the issue of a new decision by the Secretary of State relating to the earlier government refusal of an application to build 165 homes in the High Weald AONB (now National Landscape) at Turnden.

The decision by the then-Secretary of State to refuse permission, taken partially on the grounds of insensitive building design in a designated landscape area, sparked much disapproval from the development industry and was subsequently quashed, necessitating a new decision.

### **Ash Level**

A decision from Dover District Council on an application by Little South Clean Energy for a 205-acre solar farm at Goshall Valley, East Street, on the Ash Level had been expected in March but has yet to be announced.

CPRE Kent had submitted a substantial objection to this proposal, which would have marked impact on the heritage, landscape and ecology of a largely unspoilt stretch of countryside should it go ahead.

### **Cleve Hill Solar Park**

Work is continuing on the country's largest solar farm at Graveney, Swale Borough Council's rejection of the scheme's battery safety plan having been overturned at appeal in July by the Planning Inspectorate.

The 20-acre, 150-megawatt battery complex will store energy produced by the eventual 800,000 solar panels that comprise the Hive Energy and Wirsol Energy scheme. Residents and councillors alike had expressed fears that an explosion or fire could endanger lives in the immediate area.

**To keep up to date with CPRE Kent's work in fighting for our county's countryside, visit our website [www.cprekent.org.uk](http://www.cprekent.org.uk)**



# Bon voyage!



Charing Church Barn was thronged as September drew to its rainy close, with many of the CPRE Kent family travelling from across the county to gather and celebrate almost 22 years of Hilary Newport's directorship of our organisation.

Hilary is retiring with the wholly laudable intention of spending more time with husband Peter and faithful hound Cooper on their narrowboat on England's canals, something she has "loved doing since I was four years old".

Music (Hilary's favourite band The The welcomed her in), food, drink and - most importantly of all - brilliant company ensured the end of an era was marked in unforgettable fashion.

A picture paints a thousand words, they say, so here is a selection of images from what was a wonderful day. Enjoy! ■









# SIX MONTHS ON... is Biodiversity Net Gain working?

Semi-improved grassland can host a stunning array of flora

**Vicky Ellis** examines whether an initiative designed to reverse the decline of nature is having the desired impact

Developers generally opt for green fields over brownfield sites or derelict buildings because it is cheaper to build on and they prefer to start from scratch rather than renovate existing buildings or face decontamination issues, either because of the VAT advantages or to maximise on the space available.

Hedgerows, veteran trees, ponds and chalk grasslands can become an inconvenience - a hurdle to overcome, along with the protected species that stand in the way of 'progress'. "Newt-counting", former Prime Minister Boris Johnson called it, as if the pesky little creatures were deliberately scheming to disrupt and delay the pouring of concrete.

The State of Nature Report 2023 found that, from the thousands of species surveyed, one in six were at considerable risk of becoming extinct in Britain and 41 per cent of species had declined since the 1970s. Habitats were no better off, with only one in seven found to be in good condition.

These frightening and concerning stats back up what we are experiencing and witnessing in our everyday lives - the sudden drop in insect abundance evidenced by fewer splats on our windscreen, fewer wasps interrupting our picnics and fewer swallows making it back this summer, with those that managed to make it finding there were not enough insects to sustain either themselves or their young.

The outlook for Britain's nature is bleak, so the instigation of Biodiversity Net Gain could not have arrived in a

timelier manner - but will it protect our nature and leave biodiversity in a measurably better state?

In 2018, Michael Gove, in his capacity as Environment Secretary at the time, announced an initiative that was going to reverse this trend of decline in our nature: Biodiversity Net Gain (BNG) was going to leave the natural environment in a measurably better state than it was beforehand.

The Environment Act was passed into law in 2021, with BNG becoming mandatory in February 2024 after a few false starts. Now most developments must produce a 10 per cent net gain in biodiversity with either equal value in habitat creation or better, referred to as the trading rules. The BNG is to be delivered either on-site, off-site or by the buying of credits.

Some local authorities went further, seeking a 20 per cent net gain in biodiversity.

Leading up to February 2024, there were various versions of the metric tool used to calculate a net gain. The Statutory Metric uses habitats as a proxy for biodiversity and calculates the biodiversity value for the purposes of BNG.

On April 2 this year, the Small Sites Metric came in to play for smaller developments (with a few exceptions) and in November 2025 the Metric for Nationally Significant Infrastructure Projects (NSIPs) will come into force (so expect a flurry of NSIPs prior to this date to avoid the mandatory BNG gains).



The finer details on how BNG for NSIPs will work are yet to be finalised.

After decades of development with little to no consideration afforded to habitats and the species they sustain, BNG should offset the environmental destruction caused by development by ensuring that biodiversity is adequately compensated for and that there is a measurable 10 per cent net gain. Whether this happens will only be answerable over time, but we can look at whether BNG appears promising or not so far.

Trying to shoehorn something as diverse, unique and dynamic as nature into an algorithm is proving to be anything but a walk in the park; it was never going to be easy and this is evident from the number of versions of the metric released thus far, together with the continuous updates. With any significant project we expect teething issues, especially with a project as ambitious as this one, but is the metric really fit for purpose? Will BNG reverse the downward trend of biodiversity?

### How does the metric tool work?

Visit the GOV.UK website to read around BNG and you will find a clinical description of habitat types - grassland, hedgerows, lakes, woodland and watercourses such as rivers, ditches and streams.

BNG is measured in units by calculating the value of each habitat and allocating the biodiversity units accordingly. Simply put, it measures the units before the development, referred to as the baseline, then calculates how many units are needed to replace the lost habitat and then how many units are required to reach the mandatory net gain.

At the same time, the algorithm or formula takes into consideration the size, condition, strategic significance and type alongside the difficulty of creation or enhancement of

certain habitats, the time it would take certain habitats to reach their target condition and the distance from the habitat loss. All this information is put into an Excel spreadsheet.

There is a simpler version of the metric for small sites depending on the criteria that only needs to be filled in by a 'competent person' such as a gardener. However, if priority species are found or known to be present on-site then the developer has to revert to using the main metric, which then must be filled in by an ecologist or someone equally as competent and qualified.

To input this information, the ecologist will need to understand the habitat types present on-site and planned, the size of each habitat type parcel in either hectares or metres squared or kilometres or metres for linear habitats such as rivers, hedgerows or a line of trees. All the habitats within the red-line boundary should be mapped regardless of whether they are to be retained, lost or enhanced.

Any area to be used for BNG must be managed via a management plan for at least 30 years. The BNG management plan for significant on-site and off-site habitat is covered by a conservation covenant. A regular annual progress report must then be submitted and the site added to a national register specifically for net gain delivery sites.

### What problems have been encountered?

One of the main issues for verifiers, planners and ecologists who work for either the local planning authority (LPA), conservation charities or community groups is that, astonishingly, the developer is not required to submit a full metric analysis with its planning application. It only needs to submit the baseline calculation, not how it intends to deliver the 10 per cent net gain within the metric.

This makes it extremely difficult, if not impossible, to ensure that a 10 per cent net gain will be reached, especially if the developer claims it will deliver all the BNG on site within the red-line boundary. There is an element of self-policing and it is unclear what the contingency would be (other than the existing planning enforcement) if the 10 per cent net gain cannot be delivered on-site as the S106 and conservation covenant are written and agreed prior to planning consent.

Other issues encountered by colleagues so far include the following, some of which are verbatim.

- *"Should the canopy of overhanging trees and roots be included in the calculation if they breach the red-line boundary?"* No one seemed to have a definitive answer.
- *"How do you deal with the off-site provider/habitat bank the developer will use? Dealing with a small site where there will be an element of on-site provision with the remainder via an off-site provider/habitat bank - how do we include this in the metric as we don't know the off-site habitat baseline?"* Answers for this question varied from 'Put in the baseline what you know and add the rest later' to 'Make it up but make a note in the comment box'. ▶



The common blue is familiar to most of us, but this summer showed the sensitivity of butterfly populations



- *“How long is a fallow arable field left fallow before it is classified as something other than arable crop? Field has been untouched since last crop a number of years ago so is now ragwort, tall grasses etc.”* Answers to this question included ‘The guidance says two years left for cropland’. It was decided to log as ‘other neutral grassland’ with UKHab codes used for anything else suitable such as Neglected or Abandoned.

Another confusing question included a species-rich hedgerow and a large oak, with both being retained. The hedgerow was to be incorporated into the garden. The ecologist wanted to know if the hedgerow should be classed as ‘lost’ being incorporated into the garden as gardens are classed as ‘vegetated garden’ so of little value within the metric. No one really had a definitive answer and a few ecologists disagreed with one another - no one could find any guidance. Covenants were suggested, keeping the hedgerow as part of the landscaping scheme, while others said if it was part of a garden, any management plan could not be enforced. The ecologist went off to have a think...

The questions come thick and fast, as to be expected when trying to square something that has no straight lines. Try to find a straight line in nature - you won’t.

What is worrying is that some habitats such as trees and ponds score quite highly in the metric, whereas others such as calcareous grassland don’t or are extremely difficult to replicate or replace and are not yet classed as irreplaceable habitats such as chalk streams, and those are the habitats most at risk of being lost as developers scramble to cram in as much as possible into an area. Furthermore, the lines between compensatory habitat and net gain are becoming blurred in some instances. Compensatory habitat should be in addition to the 10 per cent net gain and kept separate.

The metric is not a like-for-like in terms of habitat types - trading rules are that any BNG must be worth the same in units or better. Furthermore, in some areas of the UK, property is worth much more than in others. This is problematic as the developer is more likely to opt for credits or off-site BNG, despite the increased cost, rather than lose space for a dwelling. Therefore, areas such as London and the Home Counties are at risk of becoming biodiversity deserts and losing altogether what little nature they have. Some habitat banks openly encourage off-site BNG, suggesting this would leave more room for amenity open spaces.

There have been incidents of developers destroying or degrading biodiversity on a site prior to putting in for planning permission. To prevent this damaging practice, ecologists are instructed to default to January 2020 using Google Maps to work out the baseline to discourage developers from attempting to dodge their environmental responsibilities.

However, since 2020, the flora and fauna might have increased significantly prior to being bulldozed, so either way there could be a net loss and defaulting to a past date goes no way to protecting or compensating any priority



Home to a dormouse... Kent is a stronghold for this species

species and their habitats that were wiped out in the process, nor does it take into consideration soil types.

There are individuals who are always first in line to spot an opportunity to cash in - and BNG is no different. A whole industry has sprung up around BNG either offering land to developers for off-site units, referred to as habitat banking, which organisations such as the Environment Bank offers, and others offering ways to map the baseline habitat without ever having to leave the comfort of one’s desk by doing it online using mapping tools and aerial imaging. This latter development is both alarming and worrying in equal measure as it is near-impossible to truly understand habitats and habitat parcels without a site visit, meaning key habitats are in danger of being missed altogether.

It has been a bumpy ride for the roll-out of BNG, which continues to throw up more questions than answers and baffle even the most seasoned ecologist, but, as others have said, it is better than nothing and all we have to work with. It is always worth remembering that any data output is only as good as the person who inputs the initial data, and the metric tool is no exception to this rule.

It has been a huge learning curve and a large commitment of time and expense to get staff up to speed for LPAs, consultancies, freelancers and NGOs. As the UK is one of the most nature-depleted countries in the world, we must act now or risk losing our flora and fauna. As nature diminishes, the process of decline accelerates - it might already be too late for some species to recover, especially as we continue to swallow up more and more land for ourselves.

Currently, though, BNG is all we have available to help protect our habitats - fellow ecology colleagues can be heard saying ‘Well, it’s better than what we had before, which was nothing’. ■



# For the love of badgers

Badgers live in often-complex social groups called clans

As the countryside charity, CPRE Kent is acutely aware of the importance of working with other organisations looking to protect our rural environment. Here **Alex Hills**, chairman of CPRE Kent's Dartford and Gravesend committee, talks about the work of the West Kent Badger Group, of which by happy chance he is a committee member.

**Badgers were in this country many thousands of years before humans and play a vital role in keeping nature in balance. They will eat whatever is in surplus from their main diet of worms, slugs and snails to other invertebrates (including wasp nests, which they love), baby moles, rats and rabbits to any fruit or vegetation, including roots.**

These beautiful animals live in often-complex social groups called clans - behaviour between clans can vary a lot. Yet all too often badgers are unfairly persecuted when we should instead be protecting and celebrating them.

England is the only country in the world that kills badgers to combat bovine tuberculosis (bTB), but badgers are not to blame for the spread of bTB. They have also been blamed for the fall in hedgehog numbers when this is also not true. As with so many other animals, man is the hedgehog's biggest threat.

West Kent Badger Group is dedicated to the protection

of badgers in west Kent. It has a team of volunteers who go out to rescue sick and injured animals, give advice to anyone who asks for it and make presentations tailored to the host group and take display stands to events.

WKBG responds to planning applications when they threaten badgers. The group works with many different bodies and charities and is always keen to increase and strengthen these links as together we are stronger.

CPRE is not an animal charity and WKBG is not a planning charity, but often ecology is a major issue in planning applications. Sadly, many ecology studies carried out for planning applications do not reflect what is there. I have looked at sites where it was claimed there was no badger activity only to find a large sett and a massive amount of badger activity. Hence it makes sense for CPRE and WKBG to work together, sharing knowledge and expertise.

**For more information on WKBG, visit [wkbkg.org.uk](http://wkbkg.org.uk)**



# Catching a shower

**Kevin Pressland**, CPRE Kent member and environmental campaigner, argues the case for mandatory rainwater-catchment systems

Whoa! How much rainwater do we lose to lack of a capture system?

**Sewage spills into England's rivers and seas by water companies more than doubled last year - according to the Environment Agency there were 3.6 million hours of spills compared with 1.75 million hours in 2022.**

Rolling matters back a few years, the Great Stink of London in 1858 eventually pushed politicians to act only when it affected Parliament. Politicians commissioned the civil engineer Joseph Bazalgette to create a sophisticated sewage system that took nine years digging up the capital to create six 'interceptor' sewers, which were some 100 miles long in total. Another 450 miles of sewer fed into them. We need a much more proactive approach throughout the UK now.

Water is a resource for all species and intrinsic for life - it should not be a money tree for companies and their shareholders. Nationalisation and massive investment with strong oversight must be implemented now. This is a serious matter and should not be kicked down the road; saying 'this will be addressed by 2030' is not good enough.

Water companies claim they want to address this issue and keep saying more water is coming into the system because of flash floods.

Why then do we not have mandatory rainwater-catchment systems on all new-builds? It has been proven that such systems would reduce more than 50 per cent of a household's water requirement. Further, larger-volume catchment systems should be mandatory on all commercial enterprises, with bigger-capacity tanks installed.

On other, larger, light-industrial sites these could include ponds, wetlands, SuDS (Sustainable Drainage Systems) and swales depending on topography; these would both reduce run-off and create diverse habitats while improving the quality of the work environment. Also, implosion systems could work to engender vitality and life-giving energy in the water while improving crop productivity.

While SuDS and some other soft-engineering projects have been implemented in places, they are far short of what is necessary. Imagine the amount of water run-off that could be avoided with a more positive approach across the country.

This needs government action to force water companies to pay for these rainwater-catchment systems on all new-builds, whether houses, commercial enterprises or extensions, so the cost is not incurred by the developer or the buyer. It would also reduce long-term costs for property buyers.

The cost of constructing rainwater-tank systems should be paid by water company taxes accrued by the Treasury or additional fees placed by government on those companies.

I think the government is missing a trick if it does not do this now and I believe that politically it would be advantageous. Think of the boost to the economy in new jobs, including in developing and installing rainwater-catchment systems.

There would be a multiplicity of other benefits to the consumer, for business in lower water bills and also the environment in helping to safeguard river life, the sea and indeed the wider environment.

This is in all our interests to do so, surely! The returns to shareholders and private companies should not trump the interests of the public.

Water companies would kick against this approach as rainwater-catchment systems would eventually affect their profits, but are these profits more important than the environment and reducing customers' water bills?

Turkey and Tamil Nadu in India have implemented mandatory regulations for rainwater-catchment systems on all new-builds. Germany is the largest market for rainwater-catchment systems in Europe and neighbours such as France are catching up slowly. The trend is clearly rising as many EU countries are increasingly impacted by rainwater issues... and we in Kent know all about those! ■



# GRAVETT AWARD:

## the net widens

Changed format means more students at the Kent School of Architecture, Planning and Design can enter the prestigious competition



This year's Gravett Architectural Drawing Award had a broader scope than previously, with the submission opened to all relevant modules, meaning that, in addition to the Renaissance to Neoclassicism module entries, there were also entries from the Folio module.

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 the school, part of the University of Kent at Canterbury.

And three students - Eraj Fatima, Ella Hay and Hamza Jan - were selected as winners by a three-judge panel chaired by Ptolemy Dean.

John Wotton, HBC chairman, was at June's prize-giving ceremony to present Eraj and Hamza with their certificates and £100 cheques.

The award is named after Kent historic buildings enthusiast Kenneth Gravett, who died in 1999. It both rewards excellence among students and encourages the recording of existing buildings through hand-drawing. ■



Above: John Wotton with winners Eraj Fatima, top, and Hamza Jan. The judges were taken with the work of Eraj, left, and Hamza, below.



John Wotton with Dr Manolo Guerci of KSA





# 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:**

- Responses to the council's Call for Sites have been published. The council hosted roadshow events as part of its Regulation 18 consultations over the summer. A further Regulation 18 consultation event is planned for spring 2025.

## **Canterbury:**

- Regulation 18 consultation took place this spring and summer. A new settlement at Cooting Farm, Adisham, has been deleted. A new settlement at Blean is now proposed.

## **Dartford:**

- Local Plan adopted April 22, 2024.

## **Dover:**

- Following receipt of the inspector's report after the Local Plan hearing sessions, consultation on proposed modifications took place this spring and summer. Adoption is expected shortly.

## **Folkestone & Hythe:**

- Places and Polices Local Plan was adopted in September 2020. The Core Strategy Review was adopted in March 2022.

## **Gravesham:**

- The next round of consultation is awaiting resolution of issues surrounding traffic modelling in connection with the proposed Lower Thames Crossing.

## **Maidstone:**

- Local Plan adopted March 20, 2024.

## **Medway:**

- A second round of Regulation 18 consultation took place over the summer. Regulation 19 consultation is expected to take place early next year.

## **Sevenoaks:**

- Regulation 18 consultation took place at the end of last year. Although a further round of Regulation 19 consultation had been expected before the end of the year, this is now expected early 2025 while the council takes stock of the implications of the revised NPPF.

## **Swale:**

- A revised Local Development Scheme was published July 2024. Regulation 18 consultation is programmed to take place before the end of the year.



**Thanet:**

- A revised Local Development Scheme was published June 2022. Regulation 18 consultation is expected to take place before the end of the year.

**Tonbridge and Malling:**

- The council made the decision in July to pause work on its Local Plan until the revised NPPF was published. A revised Local Development Scheme is awaited.

**Tunbridge Wells:**

- Hearing sessions resumed this summer. The inspector’s final report is awaited.

District	Plan	Oct-Dec 2024	Jan-Mar 2025	Apr-Jun 2025	Jul-Sep 2025	Oct-Dec 2025	Jan-Mar 2026	Apr-Jun 2026	Notes
Ashford	Local Plan 2042			Consultation			Consultation		Adopted February 2019
Canterbury	Local Plan 2040					Consultation			Adopted 13.7.17
Dartford	Local Plan 2037								Adopted 22.4.24
Dover	Local Plan 2020-2040	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		Examination		Adoption			
Maidstone	Local Plan 2022-2037								Adopted 20.3.24
Medway	Local Plan 2041		Consultation		Examination		Adoption		
Sevenoaks	Local Plan 2025- 2038		Consultation			Examination		Adoption	
Swale	Local Plan 2022-2038	Consultation	Consultation			Examination		Adoption	Adopted 26.7.17
Thanet	Local Plan 2020-2040	Consultation		Consultation		Examination			Adopted 9.7.20
Tonbridge & Malling	Local Plan 2031		Consultation		Consultation		Examination		
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**

<span style="background-color: #d9ead3; border: 1px solid #ccc; display: inline-block; width: 15px; height: 10px;"></span> Regulation 18
<span style="background-color: #f4cccc; border: 1px solid #ccc; display: inline-block; width: 15px; height: 10px;"></span> Regulation 19
<span style="background-color: #cfe2f3; border: 1px solid #ccc; display: inline-block; width: 15px; height: 10px;"></span> Examination
<span style="background-color: #f4cccc; border: 1px solid #ccc; display: inline-block; width: 15px; height: 10px;"></span> Adoption





# Around the districts

**A quick catch-up with our committees. 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

- The next Ashford Local Plan is gathering momentum. It will be the Ashford Local Plan 2042 when it is adopted in April 2027. The Ashford cabinet led by Ashford Independents and Greens have stuck to their commitment to be community-focused by holding drop-in events across the borough during the summer on the full unscreened array of 350 site submissions across the borough. These have caused quite a lot of alarm but also encouraged residents to get involved, which may help by giving people agency as the Plan emerges. Community involvement is what CPRE calls for and this is what it means in practice. With the new 2042 timetable in place, the first formal draft of the Plan is now expected in April 2025.
- The existing Local Plan to 2030 is now out of date and Ashford has less than five years' housing-land supply due in part to market-constrained non-delivery by developers, plus the ongoing hold-ups due to nutrient-neutrality issues on the River Stour. Ashford and Canterbury councils have now set up a joint operation that will enable developers to purchase nutrient-neutrality credits. We are also seeing controversial catchment diversion: a sewage-treatment plant approved on appeal will, if granted a permit by the Environment Agency, discharge treated effluent into the Beult, a river basin already under improvement and with a downstream Site of Special Scientific Interest (SSSI). These are the real conflicts and tensions to which we must find solutions now - and that CPRE Kent's Graham Warren foresaw some 20 years ago when he penned A Water Resource Strategy for Kent.
- The solar saga continues for Aldington and Mersham: EDF's 49MW East Stour application refused by Ashford Borough Council will get an appeal hearing, although there is no start date from the Planning Inspectorate, while the Stonestreet Green proposal is now following the NSIP (Nationally Significant Infrastructure Project) process. Both schemes rely on the proximity of the Sellindge connection. The landscape impacts, the topography of northward-facing slopes and impractical access across the Aldington flood-defence works are constraints to be properly considered.

## Canterbury - Nick Blake

- We have become increasingly concerned about how so-called affordable housing is provided. One of our committee had continually informed us of the lack of housing-association buyers for the affordable housing at Broad Oak, near Sturry. Eventually Canterbury City Council bought most of the units and proudly announced an increase in council-house numbers - another example of double-counting. What it appears to show is that housing associations don't have the ambition or the finances to provide enough affordable houses. Granting of planning consents including affordable units in no way assures they will be financed.
- As a corollary of the council's purchase of these homes, it said it was going to dispose of some of its older, less suitable, housing. Surely, we feel, it is better to provide older housing rather than have people being homeless. Many people who own their homes happily live in older, sometimes energy-inefficient, structures. At the same time, we have seen allegedly affordable, fairly small, shared-ownership homes in Canterbury for sale based on a full price of just under £500,000. In our city this is about £180,000 above what is available on the local market. Shared ownership is widely known to be a very poor deal, existing only because buyers with just a small deposit are desperate. As members of CPRE, we should be concerned about the lack of really affordable housing, both for its own sake and because if it's not provided more and more planning consents for housing will be granted.

## Dover - Derek Wanstall

- The district council has formally granted planning permission for Quinn Estates to develop a leisure complex at Betteshanger Country Park. The plans include a surfing lagoon, pools, a hub building and 15 holiday pods, and received approval from Dover's planning committee on Thursday, March 7. In a separate application, which has now also been approved, the committee gave the go-ahead for a 120-bed hotel and spa. However, following a challenge by the Friends of Betteshanger, the district council was required to carry out a revised Environmental Impact Assessment screening opinion. This revised screening opinion was issued on Wednesday, September 4. It concluded that the hotel and the surf lagoon should be assessed separately for their environmental impact as they were not considered interdependent. This decision paved the way for the planning permissions to be granted. The



formal approval has come as a blow to the Friends of Betteshanger, who, alongside the RSPB, Buglife, Kent Wildlife Trust and CPRE Kent, had mounted a strong campaign against the environmentally damaging development.

- Other planning applications seem to have slowed in the Deal area, although a substantial number of approvals has already been granted. This is causing a knock-on effect on traffic hold-ups, parking in the town and doctors' and dentists' appointments.
- Bank closures are a big issue - where and when will we see the hubs?
- The district council has received the inspector's final report on the Local Plan, confirming that it is sound. At the time of writing, the council intended to adopt the Plan at a full meeting on Wednesday, October 16, after consideration by cabinet on Monday, October 7.

## Gravesham and Dartford - Alex Hills

- The focus has been on setting up a residents' association for Istead Rise, which is proving a tough task. This is to prepare people for the Gravesham Regulation 19 Local Plan consultation, which I now know will see major building in the Green Belt.
- Mainly as a Thames Crossing Action Group committee member, I have been doing a lot of work fighting the Lower Thames Crossing. The government's announcement that it is looking at private funding for the project smacks of desperation as this was the original plan for the project but was dropped after no investors could be found. Since then, we have had Covid, financial crashes and China in recession, while the cost of the LTC has risen massively. What everyone needs to keep in mind is that there are a lot of civil-service jobs dependent on the LTC. The best way to counter this is through political pressure, so if you have any influence on your local Labour party, please use it to get the government to see sense and drop the LTC project.
- On a personal note, I would like to thank everyone for their messages of support as I fight my stomach tumour - I started aggressive chemotherapy in August. My sister now calls me Fighting Brock, or FB for short!

## Maidstone - vacant

- Sadly, there is no district committee in place in the Maidstone area, so we are without our eyes and ears on the ground. If you have a few hours to spare - and are interested in becoming more involved in looking at planning applications in the rural area around Maidstone - we'd love to hear from you.

# Free will planner

By leaving a gift to CPRE Kent in your will, you'll help us continue to promote, enhance and protect the countryside you know and love for years to come.

## It's easy to make a will

You can download and fill in our will planner and/or call Vicky on 01233 714540 in confidence for a chat.

If making a will independently and you would like to leave CPRE Kent a gift, then please include the following information:

CPRE Kent or The Kent Branch of The Campaign to Protect Rural England  
Charity number: 1092012

To learn more about leaving CPRE Kent a gift or to download our free will planner, visit:

[www.cprekent.org.uk/get-involved/leave-a-gift-in-your-will](http://www.cprekent.org.uk/get-involved/leave-a-gift-in-your-will)



CALL NOW:  
08081-968-031

WEBSITE  
[www.justhire.com](http://www.justhire.com)

# Skip Hire Made Simple

For reliable, affordable & eco-friendly skip hire.

**Skip the hassle, JustHire.**

## Our Service:



### BOOK ONLINE

Book your skip hire in under 60 seconds



### RANGE OF SIZES

We have a full range of skip sizes. 2 Yard to 16 Yard



### 5 STAR SERVICE

Our service is rated 5 stars on Trustpilot

BOOK NOW



Hire a Skip



- Following adoption of the Maidstone Local Plan (March 2024), two local campaign groups have sought judicial reviews - legal challenges in the High Court. The Save our Heathlands group instructed counsel to serve Maidstone Borough Council with a pre-action protocol letter in advance of formal proceedings, citing that the council had not correctly addressed delivery of thousands of new homes and infrastructure at Heathlands (outside Lenham) prior to adopting the Local Plan. The group has since decided not to proceed. The Local Plan also included proposals for a new garden settlement of 2,000 homes at Lidsing. Bredhurst Parish Council, supported by the Against Lidsing Garden Development group, took its challenge all the way to the High Court. However, on Tuesday, September 17, the judge dismissed the parish council's claim, so the adopted Local Plan still stands.

## Medway - vacant

- As with Maidstone, see above, we have no district committee in Medway, so again if you would like to be more involved in looking at planning applications and commenting on the council's emerging Local Plan we'd love to hear from you.
- On behalf of Medway residents, our planning staff at Charing submitted comments on the recent Medway Local Plan consultation, which closed on Sunday, September 8. These comments spelt out that the Hoo peninsula should not be allocated for housing development as it is a rural area with important nature sites and ancient woodland.
- Instead of looking to build in this part of the district, HIF (Housing Infrastructure Fund) money should be spent on unlocking derelict and previously-used sites for housing, not unlocking growth on high-quality agricultural land that is an oasis of dark skies and tranquillity in an otherwise deeply urban area. We continue to urge Medway Council to rethink its plans, protect its precious environment and focus on regenerating brownfield sites.

## Sevenoaks - Nigel Britten

- The big news is the government's proposed changes to the National Planning Policy Framework that could lead to significant amounts of development in the Green Belt. The changes could mean a huge 58 per cent increase in the numbers of houses Sevenoaks District Council had been proposing as the target for the next 15 years under the next Local Plan. It would be about five times the number currently built each year. If sites cannot be found on brownfield land (or the so-called 'grey belt' - in the Green Belt) then land in the Green Belt would be released. SDC is deciding how to go forward with the Local Plan. Reports say it intends to search for brownfield sites that have not so far been submitted, a welcome move that CPRE Kent has been urging the council to take.
- Back in 2008, we strongly opposed applications for the siting of advertising on roundabouts, and we won. The same company is back with the same applications. SDC has again refused permission and we shall be urging the planning inspector to do the same now it is going once again to appeal.

## Shepway - Graham Horner

- Otterpool Park progress is still glacial. We understand that negotiations are still going on with Homes England with a view to securing the finance needed. If that isn't achieved by Christmas, the LLP will be seeking private investors with which to partner. Council leader Jim Martin is sticking to his Green principles regarding energy efficiency and biodiversity, but who knows what a new partner will insist on?
- Speculative proposals are gaining traction. Sadly, the scheme for 132 homes at High Knocke Farm, Dymchurch, was allowed on appeal, while the 105 extra homes in Sellindge have not yet been rejected.
- Chris Reynolds, a long-standing member of our committee, is moving out of the district. His advice will be sorely missed. There's always room on the committee for new faces - it's not onerous and can be fun! If you are interested, please get in touch through the office.

## Swale - Peter Blandon

- An application for a solar-panel 'farm' to run along the side of the M2 has been refused permission despite the officer's report recommending permission be granted. Apart from loss of BMV (best and most versatile) land (even with the proviso that the loss would be "temporary"), the main reason stated was that "the proposal would result in the industrialisation of the site and the magnitude of change would result in moderate adverse effects (at best) on landscape and visual character, both on site and the surrounding quintessential rural agricultural character and within the setting of the Kent Downs Area of Outstanding Natural Beauty. The proposed mitigation measures in the form of screening through planting contribute to the harm by reducing the openness of the landscape and therefore do not overcome the harmful landscape and visual effects and would not further the purpose of conserving and enhancing the natural beauty of the AONB".
- Another application for solar panels near Rodmersham is pending, with no officer's report published yet. The local parish councils have objected, partly on the grounds of loss of BMV land.
- A 290-house development on the edge of Sittingbourne was refused permission by Swale Borough Council and one of the grounds for refusal was, again, the loss of agricultural land. The officer's report in this case had recommended refusal. It went to appeal and the refusal was overturned. An important consideration from the inspector's point of view was the shortage of housing in the borough, but his conclusion regarding agricultural land loss was: "Given the very small proportion of the overall BMV resource within the borough that would be affected, I ascribe only limited weight to the environmental and economic harm arising from the loss of highest-quality agricultural land". This is a worrying judgement as almost all likely development plots will represent "a very small proportion" of the agricultural land in the area.



- The massive Quinn Estates project from the M2 to the A2 was supposed to come before the Swale planning committee recently but postponed. However, it seems it might finally be considered soon.

## Thanet - Peter Lorenzo

- I continue chairing the Save Minster Marshes group. The group is very organised, having set up public meetings in and around Minster to notify people of the damaging Sea Link proposals. Even now, there are people who have no idea of what might be coming to the area. The group has emailed the two Thanet MPs - Sir Roger Gale and Polly Billington - and we might meet them soon; whether singly or together has yet to be decided. We have also contacted the Secretary of State for Energy Security and Net Zero, the Secretary of State for Environment, Farming and Rural Affairs and the Deputy Prime Minister but had no response from any of them. We have engaged a barrister through the English Law Foundation on a pro bono basis (so far) and had been due to meet him to discuss the issues.

## Tonbridge & Malling - vacant

- We have no district committee in place in the Tonbridge & Malling borough. If you have some time to spare - and are interested in looking at planning applications and commenting on the council's emerging Local Plan - please do let us know.

## Tunbridge Wells - John Wotton

- The Examination in Public of the new Local Plan for Tunbridge Wells Borough Council continued with a series of hearings before the inspector in June and July. As previously reported, we welcomed the withdrawal of the allocation at Tudeley village while acknowledging this would necessitate an earlier review of the Local Plan. We also welcomed the housing allocations at Paddock Wood and east Capel being amended to address issues around flood risk. However, we raised concerns that the council had not considered higher density levels as at least a partial means of addressing the reduced housing numbers and to mitigate the further loss of Green Belt land.
- We raised concerns about the adequacy of public-transport provision in the rural areas and sought a review of allocations in the High Weald National Landscape in view of the strengthened duties now placed on local planning authorities with regard to protected landscapes. Members of the district committee and the planning team at Charing attended many of the hearing sessions.
- We have continued to make representations on the called-in application by Berkeley Homes for a significant housing development at Turnden in Cranbrook, which remains with the Secretary of State for decision. One of the hearing sessions on the Local Plan was dedicated to the proposed allocation of this site for residential development and we reinforced our objections at the hearing.
- We have objected to several proposed developments in recent months. These have included:
  - Renewed applications for two large solar arrays on greenfield sites in the High Weald National Landscape in Hawkhurst and Benenden parishes; our objections are based on potential harm to the National Landscape and include a detailed critique of the environmental evidence provided by the applicant
  - An application for equestrian development at Windmill House, Matfield, on farmland in the High Weald National Landscape
  - An application for change of use of redundant egg-production sheds to commercial or industrial use near Frittenden
- We were pleased to note that an application for a residential development at Manor Court Farm in the High Weald National Landscape, to which we had objected, had been withdrawn.
- We have supported the council in taking enforcement action in respect of unauthorised development at a site near Pembury.
- In cases in the High Weald National Landscape, we have continued to pray in aid the strengthened duty on LPAs contained in section 85(1A) of the Countryside and Rights of Way Act 2000 to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape.

## Historic Buildings - John Wotton

- Kent County Council's consultation on a change to its recently-adopted Heritage Conservation Strategy, to permit the disposal of the eight listed windmills it has owned and cared for over several decades, six of which are listed Grade I or Grade II\*, received a very large response, overwhelmingly against the proposal. Despite this, the relevant cabinet committee endorsed the proposal and our committee, having responded to the consultation, will follow future developments closely.
- The Gravett Architectural Drawing Award was this year open to all BA architecture students at the Kent School of Architecture, Planning and Design. Judging, chaired by architect Ptolemy Dean, took place at the school in June and the award was shared between three students, to whom the committee chair presented their certificates and cheques at the school's end-of-year show.
- Other threats to heritage assets around the county have been reported to the committee or discussed by email between meetings. The committee objected to, inter alia, proposals for emergency lighting at Wrotham Place, the change of use of a former barber's shop in Teynham and unauthorised works at The Bull Hotel in Wrotham.
- The committee has followed the early stages of a campaign to have Richborough Roman Fort designated a World Heritage Site.
- The committee has continued to support committee member Bob Baxter in a review of the Cellar Hill and Greenstreet Conservation Area.
- Through the good offices of committee member Susan Pittman, a most successful tour of historic buildings in Otford took place in April.

# 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.



Design by Oak Creative  
T: 01303 812848  
[www.oakcreative.co.uk](http://www.oakcreative.co.uk)

If you are thinking of having a will written, or have an existing will, please think about leaving a gift, no matter how small, to CPRE Kent, quoting charity No. 1092012.

To find out more, contact  
Vicky Ellis 01233 714540  
[vicky.ellis@cprekent.org.uk](mailto:vicky.ellis@cprekent.org.uk)

## Make a date!



Martin Degenkolb from Hawkhurst was the lucky winner of a hedgehog house in the CPRE Kent raffle at the Weald of Kent Ploughing Match held in September.

The raffle at the event in Pluckley raised £72 for our charity. CPRE Kent gets around the county as much as possible to let people know what we do, while it also gives us the opportunity to engage with our members.

### There are just three more events for 2024:

AGM, Lenham Community Centre  
Friday, November 22

Christmas lunch, The George, Molash  
Friday, December 6

To join us, either fill in the flyer with this magazine or email [vicky.ellis@cprekent.org.uk](mailto:vicky.ellis@cprekent.org.uk)

Green Christmas Fair, Faversham  
Saturday, December 7

## Lottery results



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

### April 24

Mrs G Scales £50  
Mr A Harden £30  
Mrs L Dowling £20

### May 24

Mr L Wallace £50  
Mr T Mansfield £30  
Miss B Myatt £20

### June 24

Mr Harden £50  
Mr & Mrs Harvey £30  
Mr S Winn £20

### July 24

Mr S Winn £50  
Mrs S Dunn £30  
Mr B Blacklock £20

### August 24

Mr M Loveday £50  
Mrs M Price £30  
Mr L Wallace £20

### September 24

Mr M White £50  
Mr M Loveday £30  
Lady E Akenhead £20

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

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

T: 01233 714540 E: [info@cprekent.org.uk](mailto:info@cprekent.org.uk)



# Gift of membership

Please join us to help protect the countryside we all love. CPRE membership starts at just £5 per month.



The countryside charity  
Kent

## Have you considered the gift of CPRE Kent membership?

**CPRE Kent's membership is in serious decline.**

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

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

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

You can write to us at:

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

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

# Christmas cards

Help to raise funds by buying CPRE Kent's Christmas cards. We have five designs: blackbird, barn owl, robin, long-tailed tit and blue tit.

They cost just £3.50 for a pack of 10... which is excellent value for money.

They are available by calling the office on 01233 714540.

And why not give the gift of the countryside and buy a gift membership for a loved one this year? Also available online or from the office.

If you tell us it's for a gift we will even throw in a few goodies to make it extra special.



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.



Please join us to help protect the countryside we all love. CPRE membership starts at just £5 per month.



Title	Full name		
Address			
			Postcode
Telephone	Email		

We would like to update you on our campaigns and fundraising from time to time. Please tick here if you are happy for us to contact you by:

Phone

Email

Post

If you would like your partner and/or family to also enjoy CPRE membership, please add their details:

Title	Full name		

Direct debit is the easiest way to pay and helps us plan our work.

I wish to give the monthly amount of £5  £10  I'd rather pay £  per month/year (delete as appropriate)

If a UK taxpayer, please complete the Gift Aid form below.

Boost your donation by 25p for every £1 you donate. Simply tick the box below and complete the declaration below. Thank you!



Please treat as Gift Aid all donations and subscriptions I make from the date of this declaration until I notify you otherwise. I am a UK taxpayer and understand that if I pay less Income Tax and/or Capital Gains Tax than the amount of Gift Aid claimed on all my donations in that tax year it is my responsibility to pay any difference.

If your circumstances change, or you want to cancel your declaration, please contact us on 01233 714540

Full name	
Signature	
Date	

### Instruction to your bank or building society to pay by Direct Debit

Name of your bank or building society

To: The Manager	Bank/building society name

Name(s) of account holder(s)

--	--	--	--	--	--	--	--	--	--

Bank/building society account number

--	--	--	--	--	--	--	--	--	--

Branch sort code

--	--	--	--	--	--

Service user number

7	2	4	2	4	5
---	---	---	---	---	---

Reference (for office use only)

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Instruction to your bank or building society

Please pay CPRE Direct Debits from the account detailed in this Instruction subject to the safeguards assured by the Direct Debit Guarantee. I understand that this Instruction may remain with CPRE and, if so, details will be passed electronically to my bank/building society.

Signature(s)	
Date	

Banks and building societies may not accept Direct Debit Instructions for some types of account.

