

Conserve Adisham's Rural Environment



Response to Canterbury City Council
Draft Canterbury District Local Plan 2040

June 2024

adisham-countryside.com

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For an extensive local photo gallery, see adisham-countryside.com/photos

About CARE

CARE (Conserve Adisham's Rural Environment) is a local action group, established some decades ago.

We relaunched after the publication of the *first* (2045) Draft Local Plan - which included the 3,200 home *Cooting Farm Garden Community* development between Adisham and Aylesham.

We are a small committee, separate from Adisham Parish Council, whom we've kept updated. Non-party political, we proactively met each party standing in the ward before the 2023 Local Elections.

We've held community meetings for both Regulation 18 Consultations, in November 2022 and April 2024, giving information and advice and hearing views from residents, including from neighbouring villages. (For context, Over 200 attended the first meeting and roughly 70 were at the second.)

We have arranged "drop-in" sessions for those wishing to discuss things one-to-one or with difficulties completing the form.

On housing, CARE, the Parish Council and most Adisham residents we've spoken to are in agreement housing policy should be community-led.

CARE and the Parish Council are encouraging the village to form a group to write a Neighbourhood Plan, which we hope would provide greater certainty and be respected by landowners and developers alike.

The "Documents" section on our website - adisham-countryside.com - includes responses to the first consultation from us and other relevant groups, such as *Sustainable Adisham*, *Watch Over Adisham's Woods* (WOAW) and the Parish Council.

A large photo gallery is also available.

Finally, we have a private Facebook group of over 200 members: search for "Conserve Adishams Rural Environment" (no apostrophe).

Note: CARE also responded to the *first* Regulation 18 consultation in early 2023. The document you are reading stands additional to that.

About Adisham

Archaeology suggests Adisham dates from the bronze age. It has an entry (under *Edesham*) in the Domesday book.

The latest population estimate is 657 (ONS, *Population estimates for Parishes in England mid-2002 to mid-2017*).

In the Canterbury Landscape Character Assessment and Biodiversity Appraisal (LUC 2020, p279), the landscape characteristics for *Adisham Arable Downland* include:

- Small settlements linked by narrow roads, with modern buildings as well as traditional flint, brick weatherboard and thatch. [The] long linear village of Adisham follows a dry valley.
- Open views partially contained by the backdrop of woodland blocks in places.
- A strongly rural landscape that can be experienced and enjoyed by an extensive network of rights of way which connect through to the Kent Downs and the North Downs Way.

The assessment also refers (p280) to the:

“strongly rural qualities of the landscape, with its mosaic of farmland and woodland with isolated farms linked by quiet roads”

Adisham has five SSSIs woods (all registered Ancient Woodland).

Adisham, Bloodden and Cooting have conservation area status.

National Cycle Network regional route 16 runs west to east through the village.

The *Kent Downs National Landscape* (AONB) is just south of the village, within the parish area.

Through it runs the *North Downs Way National Trail*, passing Grade II listed Higham Park near Bridge, the Sedile Francigena bench sculpture, and taking in views over Barham Downs and Cooting.

We have a thriving Village Hall and Church, an “outstanding” (*Ofsted* 2017) primary school, and a newly created community garden.

Adisham is surrounded by high yield arable farmland.

Local farmers increasingly using regenerative and “min-till” methods, working closely with Natural England on Environmental Stewardship schemes including provision of field margins, wildflowers and creating a supportive environment for farmland birds.

The parish sits on an important chalk aquifer, supplying clean water to other parts of East Kent. Again, farming plays its part with the use of cover crops to reduce the risk of nitrogen leaching and methods such as "min-till" to reduce surface water runoff.

Removal of Cooting Farm Garden Community (ex-R1) - support

We are absolutely delighted Canterbury City Council listened to the "overwhelming opposition" (Consultation and Engagement topic paper, 5.1.5 p13) from the community, statutory consultees and other stakeholders to the 2045 Draft Plan.

We fully support CCC's decision to remove Cooting Farm in its entirety from the plan.

This effective "new town" had many flaws - lack of infrastructure, harm to the landscape (such as the local SSSIs, woodland and AONB), the loss of hundreds of acres of productive farmland, an unrealistic reliance on how many new residents would walk and cycle, and the loss of rural identity, not just for Adisham, but Aylesham too (R19.5).

In our response we wish to reinforce why we believe this removal is the right decision, but as *Cooting Farm Garden Community* is no longer in the new draft (R1 is now the *Rural service centres* policy), where possible we've responded under the relevant spacial strategies, district wide strategic policies and development management policies.

Crucially, large developments, especially on the scale of an effective New Town like Cooting Farm, cannot be considered in isolation. Consider:

- the big housing allocations the council has made in previous plans
- these are yet to be built, not a single house in the case of the Mountfield Park scheme (4,000 housing units on 550 acres)
- the *combined* impact of Mountfield, new proposals like Merton Park, and the 3,200 units at Cooting Farm has not been discussed
- it is easy to underestimate this impact when no construction work has begun and the latest plan's policies are presented in isolation
- we would argue the cumulative volume of development only truly becomes clear when you compare past and present Ordnance Survey maps of the district.

Removal of Aylesham South (ex-R20) - support

When combined, Cooting Farm, Aylesham South, and Dover District Council's (DDC) adjacent "South Aylesham" development would have huge impact on Adisham, Aylesham and Womenswold, in traffic, landscape and ecology, but also pressure on existing services, especially in Aylesham.

The proposed country park did little to compensate.

These developments were on the CCC / DDC boundary edge.

DDC rightly had concerns, and as we said in our last response, we don't believe CCC cooperated sufficiently with them, as legally required for plan adoption.

Removing R20 is highly sensible and will prevent irreversible harm.

Finally, as stated above, remember Cooting Farm and Aylesham South would have been *in addition to* the 4,000 house Mountfield Park scheme, and much of the daily traffic from R1 and R20 would have been heading through south Canterbury.

We note on the district housing targets, *CPRE Kent* and others believe there *is* scope for CCC to claim exceptional circumstances for the *standard method* calculation because of Canterbury's unique situation (heritage context, rural surroundings, approach road capacity and high student population).

The government has said: "Housing targets remain, but are a starting point, with new flexibilities to reflect local circumstances." (source: BBC News, 24 June 2023, quoting DHLUC)

Spatial strategy for the district (Draft Plan p7) - support

In particular we welcome:

- 1.8 the council acknowledging the importance of landscape habitats, and specific naming the Kent Downs National Landscape
- 1.12 the "brownfield-first" approach

NPPF 123 & 124 (Dec 2023) encourage use of specifically defined brownfield land while also recognising the benefits of rural land for functions besides development, such as wildlife, recreation and food production

While it can be more expensive than developing on greenfield, cost shouldn't be the deciding issue given all the other benefits

- 1.14 that the countryside has "intrinsic value" within the district, and "the contribution this makes to its rural character"
- 1.15 all listed priorities: high quality housing, infrastructure, enhancing city, town and village centres, increasing biodiversity and habitat connectivity, responding to climate change

In the "*Vision for the District*" (p8) we also support:

- the protection of new and existing open spaces
- the intention to restore and enhance habitats and landscapes
- significantly increasing biodiversity

- and the focus on high-quality public transport, walking and cycling networks, with a resulting improvement in air quality

SS1 Environmental strategy for district (Plan p11) - support

We especially welcome:

- 1.18 the acknowledgement of the range of habitats and landscapes, the “high-quality rural character of the district”, and the specific mention of the importance of the *Canterbury Landscape Character Assessment and Biodiversity Appraisal (2020)*.
- 1.19 the council acknowledging biodiversity decline, locally at Stodmarsh NNR as well as nationally
- 1.22 how conservation areas, (such as the three within Adisham, plus Highland Court nearby) listed buildings and heritages assets “make a significant contribution to the character and identity of our district”
- 1.23 that the council acknowledges the need to “ensure” these “important assets” “are protected”
- 1.24 the delivery of new open spaces and access to nature
- 1.26 the recognition that the district’s heritage assets are “highly sensitive” to change

Full SS1 policy (Plan p12-13) - support

We support every commitment in this policy.

In SS1.3 (Stodmarsh recovery), it would be wise to phrase this to incorporate recovery (and prevention of) pollution incidents across the district, given public concern in recent years at their increasing frequency.

In relation to Adisham, when the former R1 *Cooting Farm Garden Community* development was proposed, we were concerned because:

- (SS1.5) it would have been impossible to deliver without a huge on-site biodiversity net loss
- (SS1.8) the volume of house-building on higher land would have created significant runoff which would have caused flooding in the lower-lying village (see flood map Appendix E)

New public transport policy and removal of Eastern Movement Corridor, Rough Common Ring Road, and Canterbury Circulation Plan - support

The two bypass proposals - especially the *Eastern Movement Corridor* nearest Adisham - were a short-term traffic solution that would have brought immediate environmental destruction *and* long term dangers such as air pollution.

The EMC was unpopular and hugely expensive, funded in large part by developer income from Cooting Farm (ex-R1).

- the EMC's construction and use would generate a huge carbon footprint
- it would fragment wildlife habitat and harm biodiversity
- the EMC would make people drive more, not encourage a reduction in car ownership
- it would cause greater demand for city parking, slowing traffic, increasing emissions

We support the council's proposed public transport improvements, including the emphasis on Park and Ride rather than bypasses, and especially *demand-responsive transport* for rural areas, given the recent and rapid decline in bus routes across Kent.

We also support the removal of congestion zones and the "Canterbury Circulation Plan"; not because of any opposite to reducing air pollution (a concern with the bypasses and the *Cooting Farm* development) or the principle of congestion charging, but the unintended consequences from this particular scheme of people taking potentially lengthier, more polluting routes.

The zoning also seemed overly complex compared to similar measures, and the practicalities (signage, charging, customer service, enforcement etc.) would have been challenging and/or expensive.

Policy SS2 - Sustainable design strategy for district - support

SS2.1 ("New residential and commercial development in the district should be designed to achieve net zero operational carbon emissions."):

Note: we back Kent Wildlife Trust's previous recommendation that the council "consider the impact of carbon emissions during the construction phase of development, as well as during the operation phase." – specifically, they recommended SS2.1 use the phrase "net zero construction and operational carbon emissions".

Even if you do not go that far, there is scope for at least mentioning construction carbon footprint in SS2.

1.30: CARE believes the previous Cooting Farm scheme (ex-R1) would have led to a significant increase in car ownership:

- the need for most residents to regularly visit to Canterbury, Dover or Folkestone for work / shopping / appointments
- the limited destinations and frequency of the rail service
- the lack of bus routes and any connectivity with other villages

This increased car ownership would itself have led to a further reduction in safety for cyclists: Adisham lies on regional cycle route 16, which crosses the B2046 by the railway station.

It would have also increased traffic on the A260 (Canterbury Road towards Folkestone) and the A2.

1.31: The sheer volume of houses in Cooting Farm (ex-R1) would have diminished Adisham *and* Aylesham's "sense of place".

It would have been a major blow to the local farming community - virtually all the proposed 173ha is productive arable farmland with, to quote a local farmer's comments last year, "very high yields of wheat, barley, beans, oilseed rape and oats".

He added: "farming is what I know, live and breath" – this part of the policy refers to "communities where people feel proud to live".

For more on agriculture, see our comments on *DS12: Rural Economy*.

Adisham also has a much-loved primary school which survived threatened closure in the 1980s. An important part of the community, the Cooting Farm development would have created uncertainty about its future.

SS2 policy 4: Realistically, even with "community hubs", those in the Cooting Farm development would still have needed to regularly travel to Canterbury or other large towns for many services.

Policy SS3: Development Strategy for the district - qualified support

2. We agree both that "Canterbury Urban Area" should be the principle focus for development in the district", and Canterbury City Centre "should continue to be the primary commercial, leisure and tourism centre in the district", given existing infrastructure.

The Cooting Farm policy (R1) lacked sufficient facilities in an area with limited public transport options, which would placed strain on services in Aylesham and forced people to make environmentally costly car trips to Canterbury.

5. Naturally we would support any funding that can be found to improve Adisham Village Hall, now used very regularly as a result of an effective committee.

6. We particularly support the phrase "priority will be given to protecting the rural character of the district", given that, besides lack of infrastructure, fears from developments often include:

- loss of character
- inappropriate building design

- inappropriate location - in Adisham's case, the desire to retain its largely linear settlement (*2020 Landscape Character Assessment and Biodiversity Appraisal*)
- or simply loss of tranquility

On viticulture, we're concerned about confusion between *vineyards* and industrial wine production, especially where the latter would be better sited on brownfield (Spatial Strategy 1.12), such as with the C17 policy (Land at Canterbury Business Park) which is wholly situated with Kent Downs National Landscape/AONB.

We have written much more about C17 under that heading, but...

The AONB Unit continue to promote the benefits of vineyards but have objected, along with Natural England and Historic England, to the winery development within C17.

This planning application was approved by CCC's planning committee, despite it being in a policy area that was (and is) out for Regulation 18 consultation. It is major development, in a recognisable plain English sense, not just planning law, yet it has been approved before completion of Reg 18, 19, the Examination in Public or formal plan adoption.

This does mean we know rather more about it - and that there would be three 13 metre high warehouses, 150 parking spaces and 64 bays for HGV trailers.

Existing, very similar facilities are now available in the empty Gomez warehouses, sited literally next door. It is difficult to see how these could not, if even in part, be used for wine production and storage.

We urge the council to follow the NFFP guidance (paragraph 183) on developments within an AONB, specifically that major development should be refused, except in "exceptional circumstances" and must be "in the public interest" (i.e. not just for commercial reasons).

It is important not to allow a "slippery slope" where successive developments in protected areas are allowed, with the first being cited as justification for the others.

Policy SS4: Movement and Transportation Strategy for the district - support

2. We fully support the emphasis on public transport, including buses to connect rural communities.

There would have been insufficient public transport for the Cooting Farm development - although Adisham has a rail station which a proportion of the village uses regularly, overall, for many practical reasons (the range of destinations, the limited rail timetable, people's jobs, families etc.) the vast majority are still reliant on cars.

Clearly, a big concern is the service level provided by commercial operators. The £2 single fare bus cap is very welcome, but is meaningless if there is no longer a bus to catch.

At the time of the previous Regulation 18 consultation, Canterbury had lost seven bus routes. Additionally there have been regular shortages in school transport provision combined with an 22% price rise for Kent Travel Saver holders (£450 to £550 as reported by *Kent Online*, 16 May 2024).

The local operator Stagecoach has closed Folkestone bus depot and continue to remove routes or reduce their frequency.

Aylesham residents have confirmed the 89 bus to Canterbury is often over capacity, and Stagecoach has recently downgraded it so it no longer stops at Bridge, despite a petition signed by ~~600~~ 875 people.

There is a new demand responsive bus based in Aylesham, but it only serves villages in the Dover area (i.e. to the south-east, not the north - Bekesbourne/Littlebourne/Wingham or the south (Barham/Kingston/Bridge).

SS4.2(b) (city wide cycle network with links to coast, rural areas): It is important large developments don't increase risks for users of existing cycle routes or bridleways.

Regional route 16 passes through Adisham and crosses the B2046 into Aylesham. This is a busy road at national speed limit with frequent HGV traffic.

Traffic would have been considerably heavier with 3,200 homes at Cooting Farm.

Selective serious road traffic incidents on B0246 between Wingham, Adisham, Aylesham and the A2:

(sources: Kent Messenger and Crashmap)

Nov 2011	one death following three vehicle collision
Sep 2013	motorcyclist injured
Sep 2016	HGV driver killed after vehicle overturns
Jan 2018	"serious", two vehicles, three casualties
Nov 2018	"serious", two vehicles, one casualty
May 2020	two vehicles, one casualty
Feb 2021	two vehicles, one casualty
Apr 2021	"serious", two vehicles, one casualty
Jul 2021	"serious", one vehicle, one casualty
Apr 2022	pedestrian hit by lorry
Jul 2022	"serious", two vehicles, one casualty
Dec 2022	two car collision, two casualties
Oct 2023	lorry carry digger overturns, driver injured
Apr 2024	lorry crashes into house (Wingham)

Policy SS4 doesn't specifically mention horse riding (which is only referred to under *DS12 - Rural Economy*) - it is perhaps relevant to "easy and safe pedestrian and cycle connectivity" (SS4.6) or "walking and cycling routes connecting rural settlements" (SS4.4).

Horse riding is a popular activity on bridleways around Adisham, impacted both by the now withdrawn R1 development, but also the remaining C17 (Canterbury Business Park), which is adjacent to the North Downs Way National Trail and will increase traffic on Coldharbour Lane, crossed by the bridleway.

SS4.7 (air quality): A strong reason for withdrawing the Cooting Farm development, Rough Common bypass and Eastern Movement corridor is the expected air quality decline.

The Cooting Farm (ex-R1) development lacked carbon reduction targets.

Greenfield sites also disguise major air-quality reductions, in that baseline particulate levels are low in the countryside and therefore have potential to rise two or three times without breaching limits.

It is well established that poor air quality leads to chronic respiratory problems, placing pressure on the NHS and social care, and reducing life expectancy by, literally, years.

Policy 5.3 (p122) of the 2045 Draft Local Plan asserted Cooting Farm Garden Community neighbourhoods would "support net zero carbon emission living" - however it's hard to square this with the inevitable high level of car ownership among those living so far (approx 6.5 miles by road) from Canterbury city centre.

Policy SS5: Infrastructure Strategy for the district - support

Had ex-R1 (Cooting Farm) been built, this would be in close proximity to all the houses built in Aylesham in recent years, and the new ones planned in Dover District Council's own Local Plan.

As we said in 2023:

- there's already daily congestion at the A257/B2046 (Wingham) and B2046/A2 (Barham) interchanges.
- there was no provision for the additional traffic generated by the 3,200 housing-units in the Infrastructure Delivery Plan.
- there was no Traffic Management Plan
- and no proposals for upgrading the many single track roads linking rural settlements

Draft Infrastructure Delivery Plan 9.18:

Not that long ago, many councillors supported the idea of a shuttle bus service between Canterbury East and West stations, to make connections with High Speed services easier without the huge expense of a “parkway station”. Such a bus could improve passenger numbers at Adisham station and prevent car journeys between Adisham and Canterbury West, by reducing time or expense needed to make a connection.

A station shuttle bus could be demand responsive at quieter times and ticketing could be incorporated into the rail fare structure.

Draft Infrastructure Delivery Plan 9.3:

We strongly support “improved rural connectivity” in the bus strategy.

CARE is concerned about the loss or service reduction in many local bus routes and especially the unreliability of the school bus (89B to Canterbury): the village’s current, single timetabled service (and one that is over-subscribed).

Adisham is a village with bus stops, but no buses.

Draft Infrastructure Delivery Plan 9.29:

The *Stagecoach Connect* service (a demand responsive bus serving Aylesham and villages towards Dover, funded by developer money from Aylesham) extends as far as Adisham rail station thanks to the efforts of a local councillor, however it does stop in the village itself, and more crucially, does not go any further north towards Wingham or Littlebourne, so usage from Adisham is extremely limited.

Any public transport connectivity between Adisham, Littlebourne, Wingham and Bridge would be beneficial both to residents and the rural economy. Current transport provision sees Canterbury as a central “hub” with “spokes” leading out, but with few services connecting those individual spokes (see SS4.4).

Draft Infrastructure Delivery Plan 9.33:

re: Adisham, and in support of removal of the ex-policy R1:

The text in the previous draft plan suggested that Adisham station could be upgraded by adding direct access on the London platform side.

However CARE believes there is no funding available for major upgrades to Adisham from Network Rail - the commitments (Draft District Transport Strategy) are for both city centre stations (principally new entrances) and Bekesbourne (seating, cycling, step free access).

Therefore we believe CCC would be unable to guarantee improvements to either:

- the service frequency on the Canterbury East to Dover Priory line (post-pandemic, the hourly fast service that occasionally served Aylesham has been discontinued)
- facilities at Adisham (an entirely unstaffed station without rail wheelchair ramps, lifts, an enclosed waiting area or toilets)

Ultimately the quality of the train service itself is the biggest influence on passenger use at Adisham (and everywhere else).

Many people need to get to destinations beyond the Faversham - Dover line for work; connecting bus options are increasingly limited. A high speed journey to London requires changing at Canterbury or Dover (see shuttle bus comments, SS5).

During major disruption, the Faversham to Ramsgate service sometimes takes priority over Canterbury East to Dover, which reduces its appeal.

Site C17 “Canterbury Business Park” - object

We are strongly opposed to the further expansion of Canterbury Business Park, primarily due to it's position wholly within the Kent Downs AONB.

Unusually, and despite the local plan only being at consultation stage, an application for “winery” facilities - specifically large warehouses used as a factory and for storage, with hard standing and parking for approx. 150 cars and 64 HGV trailers - has already been approved by the council's planning committee. (CA/22/02055)

This prior application is still highly relevant to the local plan, because it amounts to a substantive portion of C17 site, despite the fact that the plan has not been adopted, nor even is the regulation 18 process complete.

Three statutory consultees, Natural England, Historic England and the Kent Downs Natural Landscape (AONB) Unit, along with countryside charity CPRE Kent, have raised repeated objections to the warehouse facilities for the “winery”.

They, nor we, are “opposed” to winemaking – for example, the AONB unit have run tests and trials to help Defra design it's new Environmental Land Management Scheme.

However they, nor we, believe CA/22/02055 and therefore C17 pass the “exceptional circumstances” and “public interest” tests for major development within an AONB. (*NPPF 183, Dec 2023*)

NPPF 182 also says “great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”.

During the original Strategic Land Availability Assessment, SLAA155 was determined as not suitable.

Because of all that, and because C17.1(b) is broadly drawn:

“... supporting uses, such as commercial and business, related to the delivery of the viticulture hub”

... we are sceptical development planned for the remaining land will be appropriate.

The developers had already revised the winery application, removing development of the lower left field abutting the North Downs Way and Coldharbour Lane, yet this area still appears on the masterplan.

Existing Highland Court buildings generate significant light pollution (specifically spillage, colour temperature and operational hours) e.g. the north east corner of the site, as visible from PROWs such as CB188, CB342 and CB344.

The lighting significantly impacts wildlife at different stages of the food chain (see ILP “Bats and Artificial Lighting at Night” guidance).

Whilst a condition will likely be attached to any further planning approval, this isn't much use when current lighting is non-compliant.

C17 - Summary of selected consultee responses:

(Note: because of the timeline, some of the comments mentioned are on the 2045 Draft, not the latter 2040 version, however the site masterplans are identical, and the revisions to policy text are primarily in the size of land allocated, reflecting the approved winery application.)

The warehouses are 13m tall; the *Kent Downs AONB Unit* said (letter Katie Miller, AONB Unit planning manager, to CCC, 16 Dec 2022) said:

their “large scale.. utilitarian form ... emphasizes their industrial use and would be entirely out of keeping with the existing with the existing rural character of the site and Kent Downs and more appropriate on an urban Industrial Estate.

While landscaping might reduce impacts from locations outside of the site, given the scale of the buildings this would take some considerable time and would not mitigate impacts from within the site itself. It is intended that the Winery building would be coloured to minimise its impact, but whatever decorative scheme is chosen, the changing colours of the vegetation in the surrounding

landscape during the year and scale of building would make it very difficult to camouflage to any great extent.

Furthermore, it is not sufficient to restrict building heights so that the development cannot be seen from outside the site, the site itself is part of the AONB landscape. The heights and design of buildings on site must take account of the need to conserve and enhance the character and qualities of the landscape.

and:

While noting that the site is proposed adjacent to an existing Business Park, this is an anomaly in the landscape, established historically as an extension to the agricultural activity at Highland Court Farm. Although relatively contained from the wider landscape in views, the development has a significant detrimental impact in close up views. The expansion of the Business Park as proposed would significantly exacerbate the effects on the character and appearance of this part of the AONB. It would be entirely inappropriate and to justify further harm to the AONB due to the presence of this existing detracting feature in the landscape.

Historic England (letter from Alice Brockway to CCC Planning Officer, 20 March 2023) argue the winery warehouses *already* proposed will block views of Grade II listed Higham Park (within Highland Court Conservation Area) from existing PROWs, and describe the farmland as “productive landscape” which “makes a positive contribution to the significance of the conservation area.”

They consider the development – again, this refers to just the initial winery application, not the rest of C17 yet to come – could be visible in longer views.

Historic England also raised concerns about lighting, vehicle noise and traffic, and specifically addressed the wider 2045 Draft Local Plan:

“...in our view, the draft Local Plan fails to meet the strategic objective of NPPF Paragraph 7 to achieve sustainable development because of the risk of significant harm to the historic environment arising from a number of policies related to the allocation of sites, including a proposed allocation for Highland Court Farm.”

Natural England (letter, Heather Twizell to CCC planning officer, 20 March 2023) also commented both on the winery and 2045 Draft Plan:

The proposal will still result in a fundamental change in landscape character within the AONB, thereby having a significant impact on its purposes of designation.

In terms of visual impact it is the largest and tallest buildings ... that are being retained.

We remain concerned as to whether all possible options for meeting the need outside the AONB have been explored.

We have now objected to Policy C21 [previously C17] in your authority's draft Local Plan which makes provision for a ~20ha extension to Canterbury Business Park (of which the application site would form a part).

The *KCC Transportation* lead said she:

“[did] not consider that the framework travel plan [would] encourage any employee to adopt sustainable transport.”

Finally, *CPRE Kent* (May 2024) believe “this permission will lead to the devastating 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.”

C17 - Existing facilities: Since the original Draft Plan was published, over 240,000 sq ft of warehouse/logistics space within C17 (outside the red-line, but with allocated land to C17 on three sides), previously occupied by *A Gomez* (a fruit packaging company) has become vacant.

This is literally right next door to the proposed winery site and has full HGV access - i.e. it retains the location and connectivity benefits the group developing the winery have cited for choosing Canterbury Business Park.

The size of the available warehouses suggests a substantial part of the winery, if not all, could be housed here. Likewise so could some or all of C17's proposed “viticulture hub” - a much preferable alternative to further commercial and business development on greenfield AONB land.

We feel the onus is now on the wine companies to treat the Gomez site as they would the others in an alternative site search, demonstrating – at a reasonable level of technical detail – why they still need to expand the business park when these four warehouses sit unused.

C17 - Ecology: at the moment, the only data available is the Baseline Ecological Appraisal (BEA) from the winery application (*Aspect Ecology, Sep 2022*). Again, the extension of C17 beyond the existing planning application makes this relevant.

There are limits to the BEA. The report, especially the fieldwork (Sep/Oct 2021) is starting to age, but also, the survey area:

- didn't include the *Priority Habitat* woodland on the western boundary (between the proposed site and the North Downs Way National Trail) - this would be useful especially for bats, to determine if the ones in the area are roosting in the trees that would be next to the warehouse buildings.
- didn't include land immediately around Higham Park - for example the report has no fieldwork of it's own on Great Crested Newts (GCN), although there are two ponds identified in the grounds of the house (the Italian water garden actually has a 230m canal, the longest in any garden in England apparently). The report cites limited fieldwork from 2015 – which *did* find GCN evidence, but without a full population survey. Therefore the BEA is left speculating on data from the 1980s/90s. (5.8.2 -

5.8.8). There are more modern, cost-effective techniques available now, including eDNA analysis.

- didn't include the remaining land in C17 (SLAA155) to the north-east (by the camp site), or a surrounding Zone of Influence (ZOI) for that.

Finally, it's highly plausible bats could be roosting at Higham Park *itself* - there are plenty of bat roosts at other stately homes and they may be drawn to the water features for foraging and hydration. It feels worth deploying a static detector and/or conducting an emergence survey.

We'd argue all the areas above are close enough to be justify inclusion in the survey ZOI, if not already on or inside the red-line boundary.

A broader concern is the sequencing of fieldwork and construction: if for example, wildlife has *already* been disturbed by heavy plant, temporary lighting etc. for the winery before EIA surveys commence in nearby areas.

We note the BEA assigns *district* level importance to bats (i.e. significant), and *local* to dormouse and GCN.

C17 - Flora: we have very recently observed a *White Helleborine Orchid* site (GB red-listed) less than 500m-1km away from Highland Court with more than 400 individual flowers. Also, in May 2024, a *Lady Orchid* was found less than 500m from Highland Court land. These records have been submitted to the Botanical Society of Britain and Ireland and Kent and Medway Biological Records Centre.

Site R7: The Hill, Littlebourne - neutral

Bekesbourne Lane (purple arrow on the map, but not specifically mentioned in the text) is very narrow in places and lacking footpaths, so much that Howletts recommend visitors to take a taxi for safety.

We're concerned it will be unable to cope with its share of traffic from a 300 house development, and also about the impact on traffic further south, e.g. at the junctions either side of Bekesbourne station.

The north/south corridor between Bridge, Patixbourne, Bekesbourne and Littlebourne, perhaps extending east to Adisham too, would seem a good candidate for a demand responsive bus service.

Visitors to Howletts alone (which previously ran a shuttle from the station) would generate a steady level of usage. Such a bus could also provide a link between Bridge and Littlebourne GP surgeries - patients must sometimes attend both.

Wildlife: The landscape buffer, plus lighting to latest ILP standards, is important to minimise disturbance to animals at Howletts. Sensitivity is needed during the construction phase.

Site R12: Land west of Cooting Lane and south of Station Road - neutral

We agree R12 is a "modest" development; as a group we've remained neutral whilst sharing basic information and providing opportunities for residents to discuss it.

We believe some people will conditionally back R12 (e.g. with funding for improvements to road safety or parking on Station Road) but you'll need to read individual responses to gauge opposition and support.

Inevitably traffic calming is a village-wide concern, but especially on this narrow section of road, with fast-moving through traffic between the Adisham Downs Road and B2046.

Cars routinely park on the pavement directly opposite the site.

Reaction to a formal planning application will also depend on careful access point location.

There was some enthusiasm for affordable/social housing and starter homes, but uncertainty over how DS1 will be applied and if the site meets the threshold (we've subsequently estimated it to be at least 0.7ha, so believe it qualifies on area, if not necessarily housing units.)

There are drainage issues on lower land 125m NW, where Station Road merges with The Street.

We support the addition of 1(f) - "Protect and enhance the existing trees on the frontage to Station Road."

For a current wildlife summary, including the R12 area, see Appendix B.

Policy R19: Countryside - qualified support

- R19.1 we support that development will only be permitted "where it protects the rural character and appearance of the countryside".
- R19.2 makes a direct reference to viticulture. We urge the council to note the vastly different impacts between the *vineyard* stage of winemaking and its later *production* involving factories, storage warehouses and road distribution, potentially at industrial scale.
- R19.5 we particularly welcome both the protection of "valued open spaces" - just as important in rural areas as in towns and cities - and the pledge to "resist development ... which would erode the separation between, or the character or setting of, individual settlements."

The visual effectiveness of any "green gap" will change seasonally, and impacts are not *purely* visual - major development will often affect levels of noise, air and light pollution which can easily spread beyond the gap, again according to weather, time of year etc.

Policy DM5: Parking design - support with comments

Technical note: it would help, purely so readers can better navigate the plan documents, if either 7.8 or DM5 specifically referenced Appendix 3 ("Parking Standards") given the level of relevant detail in it.

DM5(b, d and f): We would add the use of *energy saving* lighting, and lighting which, while providing sufficient safety and security, minimises unnecessary spill and is compliant with ILP (Institute of Lighting Professionals) guidance - including recent guidance note 8: "Bats and artificial lighting at night".

DM5(i) (parking control): Where this involves sale of permits or tickets, this should be designed such that it still supports those unable to use smartphone apps.

Also, the council should take steps to avoid incidents elsewhere where fake QR codes have been stuck over car park signage for "phishing" purposes.

Policy DM15: Sustainable drainage - support

The policy doesn't specifically mention mention agriculture.

We hope the council recognises the value added by local arable farmers using, for example, "min-till" methods to reduce surface water runoff.

Adisham already has unresolved problems with flooding. (See flood map, Appendix E). After even brief periods of intense rain there is standing water at the eastern end of Station Road near the railway bridge and the western end by Pond Green. Further to the south, there is flooding along Cooting Lane north of the farm buildings.

This is before the 3,200 new houses in the Cooting Farm (ex-R1) development, which would change the landscape and flow of water in unpredictable ways, including during the construction phase with heavy machinery compacting the surface.

The northern end of the development would have included at least one large arable field south of Station Road and the railway station (footpath CB529) - covering this with houses would inevitably cause runoff worsening the Station Road drainage.

The increased footfall on public rights of way from the new homes on the former R1 site would make them much muddier in poor weather, which is also an issue for farmers as walkers avoid mud by stepping onto crops or environmental field margins (see our comments under DS21 on Kent Wildlife Trust/Woodland Trust evidence).

Policy DM16: Water Pollution - qualified support

We support the measures here, *provided* developers' assessments can be backed up by robust independent expert assessment.

Sewer capacity and blockages are also a problem. There are already repeat incidents downstream of Adisham (on farmland in the Bossington area) where the sewer pipe is

blocked and raw sewage literally bubbles to the surface, requiring attendance of the water company.

We would emphasise how pollution incidents can have devastating effect far beyond the site area. The previously proposed Cooting Farm development sits on high ground (almost 100m) on a chalk aquifer.

An important bore-hole is situated in the parish area: we understand from conversations with water company staff on the ground that this supplies Thanet and elsewhere. The aquifer, tapped by the bore-hole, includes the chalk under what would have been the Cooting Farm development.

A few years ago, a tank above the aquifer was punctured and released a potentially water-contaminating substance. The water company had to remove large quantities of contaminated soil/subsoil and had staff active around the release area for a long time.

We're led to believe such a situation was serious enough that if the contaminant had filtered down to the aquifer, areas like Thanet could have had to use bottled water until a new, uncontaminated water source could be tapped and new pipes laid.

Increasingly intense rainfall caused by the changing climate has also led, not only to standing surface water and localised flooding in parts of the village (see flood map Appendix E), but to unexpected supply problems: in early 2024 parts of Adisham and several surrounding villages were off supply and reliant on bottled water for a day or two because filters at Wingham Pumping Station needed to be replaced.

Given these levels of risk and how we all take clean water for granted, we believe **risk assessments should happen before policies are adopted.**

We are also concerned about the planning and capacity of sewage and water treatment for large developments.

Those living near or in major developments would rightly expect funding commitments from water companies for safe, sufficient, carefully planned facilities.

It is unacceptable for daily tanker collections from new developments for months or years, because water treatment facilities are yet to be built - critical sewage infrastructure must be in place from the start.

By way of comparison, the council's Sustainable Design policy (DS6.11) says major developments "must deliver fibre to the premises (FTTP) infrastructure prior to first occupation" – if broadband is now classed as a critical utility, we shouldn't allow an end-to-end sewerage system to be taken for granted or deprioritised.

We hope the council recognises the value added by local arable farmers who work with Southern Water to plant cover crops that reduce the risk of nitrogen leaching, and who are using "min-till" methods to reduce surface water runoff.

Policy DM18 - Light pollution and dark skies - qualified support

In particular we support:

- DM18.1 the overall desire to minimise light pollution
- DM18.3(a) the specific reference to latest ILP guidance
- DM18.3(c) the range of unwanted effects mentioned, and the road safety points
- DM18.3(d) the recognition of the value of "immediate" and "wider" landscape settings and dark landscapes, including an appropriate colour temperature
- DM18.3(f) the specific reference to long distance views
- DM18.3(g) the specific reference to wildlife disturbance
- DM18.3(h) the additional acknowledgement of protected species, which have their own ILP guidelines
- DM18.4 the specific mention, in addition elsewhere to long distance views and immediate and wider settings, of areas classed as having Dark Skies

In our response to C17 we mention localised light pollution at Highland Court. Light from Aylesham industrial estate also affects Adisham and the surrounding PROW network.

We would frankly back *any* measures available to or suggested by the council for enforcing or encouraging *reduction* of light pollution in *existing* developments, rather than steps that will only prevent it getting worse.

Policy DS1 - support

DS1.1 We support reducing the threshold for the 30% housing mix from 11 dwellings to 10, which brings it in line with the "major development" definition in the NPPF. Aligning the thresholds this way makes far more sense.

Policy DS7: Infrastructure delivery - support

In particular we support:

- 6.18, the agreement of a delivery programme with infrastructure providers
- 6.19 that the council will not accept further viability evidence from developers beyond the policies in the plan, other than in "extremely limited circumstances"
- DS7.1 that developers provide or contribute towards needed new or improved infrastructure

- DS7.2 that developments which can't demonstrated the needed infrastructure will be provided on time will be refused (we support the "Grampian" principle)
- DS7.4 that developments should make provision for all the land needed for additional infrastructure
- DS7.7 planning conditions and agreements to release land for development in phases so infrastructure is not overwhelmed (we welcome the specific mention of sewage here, see comments on DM15 and DM16)

Policy DS8: Business and employment areas - comments

Given this policy defines where the business areas are, we would like to see some mention of appropriate/inappropriate development relating to landscape and protected area status - e.g. NPPF 183 states that major developments within an AONB should be refused except in "exceptional circumstances", and must be "in the public interest" (see comments on C17).

DS8.3 says proposals *adjoining* business and employment will be supported *if* they align with other policies in the plan, *and* they're proportionate in scale, *and* there's demonstrable need.

However DS8.2, which specifically refers to "intensification", doesn't appear to have any of these safeguards, especially the first one about alignment with other policies.

Policy DS12: Rural economy - qualified support

DS12.3 (protecting agricultural land) We are pleased the council explicitly states it will "seek to protect the best and most versatile agricultural land for the longer term."

It has rightly backed this up by withdrawing the *Cooting Farm Garden Community* policy in full and saving 173ha of it.

However we are concerned that this has received insufficient priority in past plans and administrations.

We are worried (also saddened) by the scale of farmland already lost: 550 acres of grade one land alone at Mountfield Park in south Canterbury, for example.

Construction of the first homes there is still to begin, so there is no visual indication yet of what is to come, nor are the effects being felt in the supply chain.

Regarding ALC (Agricultural Land Classification) grades, sometimes people dismiss the value of farmland below grade one.

Yet not everyone seems aware that:

- there are six gradings overall (including 3a and 3b)
- grades 1,2 and 3a all count as BMV land ("best and most versatile")

- all are capable of providing moderate to high yields or arable crops
- and the land “quality” ranges from “good” to “very good” or “excellent”.

Please see *Appendix A: Farm Yields*, where we have provided figures for wheat, oil seed rape and barley from one farm on ex-R1 land.

To quote an experienced local farmer, who is in a partnership farming this land:

“Although some of the land in question is not of the highest quality, according to official designation, I know it produces very high yields of wheat, barley, beans, oilseed rape and oats. It is relatively easy working meaning it doesn't need huge amounts of horsepower and fossil fuels to grow those high yields. It's just the sort of land we should be protecting and keeping as food producing areas as the ever growing world, and UK, population increases. Once it's concreted over it's impossible to bring it back into food production and the food it once produced so efficiently on our doorstep will have to be grown and transported in from elsewhere (probably from land that is currently under South American rainforest as that is the only place where new farmland is 'made' today.) ”

Britain is the world's third largest net importer of food and drink (UN Food and Agriculture Organisation) so we are at risk of price increases and shipping delays caused by global demand, weather and crop yields.

Increased carbon footprint from imports undermines the efforts being made on sustainability and BNG policies.

In the past 12 years England has lost over 14,000 hectares of Grade 1 and 2 agricultural land to development, the equivalent to the productive loss of around 250,000 tonnes of vegetables (CPRE, July 2022). CPRE also found a 100-fold increase in best farmland lost to development between 2010 and 2022, which suggests it's getting worse.

Often BMV land also has higher risk of flooding.

We would welcome wording in DS12.3 of the policy to give greater force to the value of the agricultural land when weighed against housing, business etc.

Arguably the wording of DS12.3 implies farming is somehow separate from “business”. when it is a business - an economic entire sector - in its own right.

Agriculture also makes year-round *community* contributions through increased biodiversity (including Environmental Stewardship) and an enjoyable PROW network, enabling access to nature.

If productive fields continue to be lost, the aspiration in DS12.1 to grow and diversify the rural economy will be compromised.

Policy DS18 - Habitats and landscapes of national importance - support

This policy is particularly important locally in light of both C17 (the ongoing Canterbury Business Park development) and the withdrawn R1 site (Cooting Farm Garden Community).

DS18.1: Kent Downs AONB Unit, Natural England, Historical England and CPRE Kent have all said the viticulture warehouse development (already granted planning permission) in the centre of site C17 will harm the AONB, so it is fair to assume the harm would increase if the site expand even further. (The AONB did not think the shielding in the landscape buffer area to the south west was adequate, for example.)

“Tranquility” was a key aspect of our opposition to the Cooting Farm site, and is discussed in the 2020 Landscape Assessment and Biodiversity Appraisal (map fig 3.9).

DS18.4: we appreciate the wording that material scientific or nature conservation harm within SSSIs, NNRs and MCZs can be “direct”, “indirect” or “cumulative”.

DS18.6, the protection of irreplaceable habitat such as ancient woodland (adjacent to the ex-R1 site) is also directly relevant to us (see also the Kent Wildlife Trust remarks on recovering SSSIs in our comments on DS19).

Finally we are also concerned about cumulative expansion of sites over long periods of time across multiple Local Plans, and of the risk of planning decisions considered in insolation - e.g. where previous concerns of initial encroachment onto greenfield sites have been long forgotten when considered in subsequent plans - leading to “extinction debt”.

Policy DS19: Habitats, landscapes and sites of local importance - support

In particular we support:

- DS19.1 references to “intrinsic nature conservation and/or scientific value”
- DS19.1 the forceful statement about the mitigation hierarchy
- DS19.3 restriction to developments that conserve/enhance the landscape (including heritage, archaeology and nature conservation)
- DS19.5 the sensible limitations on sports and recreations uses within the green gap, including consideration of lighting
- DS19.6 the reference to the LNRS (Local Nature Recovery Strategy)

Policy DS21: Supporting biodiversity recovery - support

We support the detailed BNG (biodiversity net gain) mitigation hierarchy and note the addition of references to green bridges and tunnels and the LNRS.

Specifically on nature recovery, for the former Cooting Farm site (ex-R1), the PROW network would have been harmed not only by the construction, and the loss of natural views and tranquility, but also increased footfall from dog owners in the new properties.

As *Kent Wildlife Trust* said in their 2045 Draft Plan response:

“The SSSIs are currently recorded as being in either unfavourable or unfavourable recovering condition. We consider that major development adjacent to the woodland will result in increased recreational pressure on the woodland resulting in trampling, disturbance of species through visual disturbance and disturbance from dogs.”

They cited *Woodland Trust* research on trampling of paths causing very losses of vegetation as high as 75%, as well as dog predation of breeding birds.

Policy DS22: Landscape character - support with comments

A “new town” at Cooting Farm would have destroyed much of Adisham’s landscape character, with a construction period of many years, and post-construction the additional traffic (at least some of which would inevitably reach the site via existing village roads), noise and light pollution, which would easily spill beyond any “green gap” and the red-line boundary.

DS22.2(c) (impact on long distance views from vantage points, PROW and national trails):

Adisham’s valley location and the extensive PROW network surrounding it mean the 3,200 houses and commercial hubs in the Cooting Farm (ex-R1) development would be clearly visible from:

- bridleway CB188/5 (to the west of Adisham Court Farm)
- the trig point (72m altitude) west of Adisham on the same bridleway, close to Twelve Acre Shaw (TR 21462 54140)
- looking east from footpath CB198/1 by New Woodlands Farm
- the eastern section of Woodlands Road and bridleway CB203 leading south from Woodlands Road into Oxenden and Pitt Woods.
- from houses on the other side of the B2046 in Aylesham, which currently have a view of the SSSI woodlands (Woodlands Wood, Pitt Wood etc.)
- the North Downs Way (albeit from farther away, but the proposed 173ha would be hard to miss)

- and of course all the PROWs within or bordering the red-line itself, such as CB192, CB193, CB194, CB195, CB195A, CB526, CB199A, CB200 and CB202.

Many of these views are shown in the photo section of CARE's previous 2023 Regulation 18 consultation response and at adisham-countryside.com/photos

The tranquility map (2020 Landscape Character Assessment / Biodiversity Appraisal, fig 3.9) has much of the southern R1 site in green (indicating the most tranquility).

Appendix A

Farm Yields

Yield from just six “farm two” fields that would be destroyed by an Adisham New Town (*Cooting Farm Community Garden*, ex-policy R1)

Field number	Yield (ha)
1	20.00
2	19.45
3	34.68
4	3.00
5	30.00
6	9.26
Total	116.39

The average wheat yield from this part of Farm Two is 10.5 tonnes/ha.

On average 1 tonne of **wheat** can make 700 loaves of bread.

At 10.5t/ha on 116.39ha, the farmers of Farm Two produce 1,222 tonnes or 855,466 loaves in one year on the land previously allocated for R1. This is only one of the two farms that would be swallowed up by the new town.

“Farm Two” farmers grow wheat in a one in 3-4 year rotation over 25 years: seven wheat growing years, or six million loaves of bread over 25 years.

When this land is not used for wheat, it produces **oil seed rape** (OSR) to make rape seed oil, **barley** for beer, and **beans** for human and animal consumption.

Cooking oil: On Farm Two, the average OSR yield is four tons per hectare. One tonne produces 450 litres of oil used for cooking. So, Farm Two provides, on average, 209,502 litres of oil per year from 116.39ha of highly productive land.

Beer: To produce 1 litre of beer, 200g of barley (plus water and yeast) are required. Farm two's average barley yield is 8.5 tonne/ha, or 8,500,000g/ha.

That produces 42,500 litres of beer/ha, so Farm Two produces five million litres of beer each year over its 116.39ha area. An average annual production of 8,704,755 pints!

Conclusion

Adisham is a community with an identity based on farming (and sustainable timber production from 12 ancient woods).

It has a proud history of agricultural innovation. Adisham's John Reynolds (1703-1779), an early farming pioneer, developed methods which came to the attention of the Royal Society of Arts, which presented him with a silver cup for his efforts to modernise agriculture.

The family farmers of Farm Two are imbued with that spirit of agricultural innovation in which they successfully marry high production of food with enhancement of the countryside.

Appendix B

Recent Wildlife Summary

Notes:

This is a non-technical overview of contemporary wildlife observations - i.e. mostly since the publication of the 2045 Draft Plan in late 2022.

It includes relative locations/distances to sites R12, C17 and old-R1.

Latin names are largely avoided.

Detailed, raw data has been uploaded/sent to iRecord, BirdTrack (BTO) or Kent Bat Group as appropriate and is available on request from us.

Archived Kent Ornithological Society records are in Appendix D.
(Appendices C, D and E are reproduced from CARE's 2023 submission.)

Additional data available from KMBRC, NBN Atlas etc.

Badgers:

There is an active badger sett (latest sighting 9 Dec 2023) by footpath CB529 leading to Adisham railway station, on the northern edge of former site R1 (Cooting Farm) and 300m ESE of the R12 boundary.

A badger was also observed near Oxenden/Pitt Woods (bridleway CB203) on 15 Feb 2024 (approx 600m W of old R1 boundary). There may be a sett by Woodlands Road.

Occasional sightings on farmland north of the village.

Bats:

Five bat species present in Adisham (all observations since late 2023):

- Common pipistrelle (*Pipistrellus pipistrellus*)
- Soprano pipistrelle (*P. pygmaeus*)
- Brown long-eared bat (*Plecotus auritus*)
- Daubenton's bat (*Myotis daubentonii*)
- Natterer's bat (*Myotis natterii*)

Fieldwork: manual night-time bat walkover surveys of roads, PROWs, adjacent arable land, woods, and village features such as churchyard, recreation ground, railway station etc. Using a combination of:

- visual observations
- heterodyne detector (audible, interpreted in real time by observer)
- full spectrum recordings (manual sonogram analysis of full spectrum files was used, with reference to *Bat Calls of Britain and Europe (Russ)*. Some calls uploaded to the *BTO Acoustic pipeline* (a machine learning system for bird and bat audio analysis) or shared online for peer-review.

As normal for region, pipistrelle species most frequently observed.

Subspecies of *Myotis* genus are harder to positively identify.

The Daubenton's bat was recorded for two consecutive nights close to the village hall/recreation ground. One of these was a *plausible* Bechstein's bat, but this is a very rare species in Kent and we have insufficient data.

A Brown long-eared was recorded twice in the churchyard over winter.

Natterer's bat observed at northern edge of Oxenden Wood (south of Woodlands Road).

Proximity of bats to development sites: many passes at the boundaries of or very near R12 (though you should note many more observations have been made within the village than in SSSI woods etc.)

All observed species have "core sustenance zones" (how far they will typically travel for food) of at least two 2km (3km for soprano pipistrelle and brown long-eared, 4km for Natterer's), so, whilst it depends on their roost location, they're *all* generally within reach of R12 and C17 as well as the former R1 site.

(See section 3.7 (p37) of *BCT Good Practice guidelines, 4th edition*)

Kent Bat Group is in process of organising dusk surveys of the churchyard (designated *Local Wildlife Site*) for Serotine bats, an *indicator species* in Kent Nature Partnership (KNP) biodiversity strategy.

Birds - Farmland / hedgerow / grassland / parks / chalk downs

To be read in conjunction with older Kent Ornithological Society records in Appendix D. Birds identified by combination of manual visual and audio ID, sometimes assisted by audio analysis (Merlin app etc).

Blackbird, blue tit, buzzard, carrion crow, chaffinch, chiffchaff, corn bunting, collared dove, dunnock, great tit, greenfinch, grey heron*, goldfinch, green woodpecker, great spotted woodpecker, gulls, house sparrow, jackdaw, kestrel, kite, long-tailed tit, magpie, marsh harrier, red-legged partridge, robin, rook, song thrush, skylark, sparrowhawk, starling, swallow, turtle dove*, wood pigeon, wren, wagtail

starred entries:

- Grey heron: photographed close to Cooting Farm buildings in previous years. Observed 10 March 2024 taking off from same area, flying north (possibly to Stodmarsh NNR).

- Turtle doves: in past years a Station Road resident has observed doves (a KNP *priority species*) in her garden (close proximity to ex-R1 and R12)

Birds - owls:

Tawny owls heard at multiple sites including Bossington, Adisham churchyard / recreation ground, on farmland across the proposed Cooting Farm site and within the various SSSI woods. (Tawny owls often nest in exactly the same place throughout their lives.)

Visual owl sightings (including barn owl) in 2024 at Bossington (north of railway, from footpath CB190A) and Woodlands Wood (from CB204).

Fox:

Occasional random sightings, often daylight, including SSSI woods and village itself (e.g. northern edge of site R1 and 150m from R12, May 2024).

Hedgehogs:

Indicator species in KNP biodiversity strategy. Frequent in village gardens for many years (every night in some). The most relevant plan policy site is R12: hedgehogs were observed in 2023 close to the junction of Station Road and Cooting Lane, crossing the road at that point and foraging in the verge to south of Station Road.

Based on observations from houses at the upper end of The Street (south of footpath CB190) it seems likely they use the field as a wildlife corridor. This is the northern boundary of Cooting Farm (ex-R1) land.

Insects:

A mix of butterflies, moths, dragonflies and bees.

Mammals (general):

Badger, Bat, Fox and Hedgehog (see above), grey squirrel, hare, rabbit (see below), shrew, stoat, vole, wood mouse

Rabbits:

Common locations include railway station footpath (CB529) and fields near Twelve Acre Shaw area (CB188).

Reptiles:

Frog, grass snake, newt, slow worm, toad

Appendix C(i)

Impact of former R1 development on the Kent Chalk Downland landscape

(reproduced from 2045 Local Plan Response)

Lying within the hinterland of dipslope country of the East Kent Downs, the proposed development would have an impact on a range of species and habitats characteristic of this landscape. The undulating farmed countryside is notable for its well-drained chalk soils which support important arable plant communities. Arable fields immediately adjacent to Well Wood and Ileden Wood and within 500 metres of the site have been surveyed by Plantlife (International Conservation charity for wild plants) in 2016 and have been found to support nationally rare and threatened species such as fine leaved fumitory, stinking chamomile and dwarf spurge. The survey's findings concluded that these "arable fields are of great importance for arable flora and the continuation of cultivation is required to sustain their populations" (Arable Plant survey Ileden Farm, Plantlife 2016). The proximity, same soil type and cultivation patterns in the arable fields of the proposed development area mean that it's highly likely that a similar arable plant community lies within the footprint of the site. Ceasing arable cultivation within this area will therefore have a detrimental impact on these important plant communities. The arable landscape of the Cooting Downs and general area also supports notable farmland bird breeding populations, notably red listed (birds of conservation concern) species such as grey partridge, corn bunting, barn owl, skylark, yellowhammer and linnet. These species rely on the undisturbed, open arable landscapes of the area and being birds of 'open country' will be adversely affected by the proposed development area.

Within 1km of the proposed site lies an important expanse of 100ha of native wildflower grassland. These undisturbed grasslands support a diverse array of plant and insect life, including a large colony of small blue butterfly (UK BAP Section 41 priority species), dingy skipper, wall brown, small heath (also all Section 41 species), six belted clearwing (nationally scarce), and 16 species of bee including both brown banded carder bee and ruderal bumble bee (nationally scarce, Section 41 species). These grasslands also support breeding yellowhammer, corn bunting, linnet, skylark, barn owl and grey partridge. The development is highly likely to result in increased footfall and public recreation pressure on these grasslands which would have an adverse disturbance effect on the insect and birdlife of these grasslands.

18/12/2022

Appendix C(ii)

Impact of former R1 development on the Ileden and Oxenden Woods SSSI and adjacent land

2024 update: this section was originally written in late 2022, but please note the author's recent orchid discoveries (White Helleborine and Lady Orchid) in sites close to Highland Court Farm, mentioned in comments on site C17 (Canterbury Business Park). These records have been submitted to the Botanical Society of Britain and Ireland and Kent and Medway Biological Records Centre.

The proposed development of a 'garden community' at Site R1 in the Draft Local Plan represents an existential threat to the flora and fauna of the Ileden and Oxenden Woods SSSI and adjacent meadows, scrub and agricultural land. The SSSI is designated for its nationally rare woodland stand and the rich ground flora and breeding bird community that these woods support. It is a unique site that wholly deserves the national protection its SSSI status affords and whose special interest must be conserved and enhanced.

Firstly, to establish the importance of the SSSI site in question, we should review the species currently present at the site.

These woods themselves hold one of the country's largest populations of Lady Orchid, a nationally-rare species classed as Vulnerable on the GB Red List for Vascular Plants, almost completely confined to Kent's chalk landscapes (and hence its recent designation as one of only three Kent Biodiversity Strategy plants). Alongside the Lady Orchid, the SSSI's citation highlights the presence of the Narrow-Lipped Helleborine, another nationally-rare plant.

Botanical records show that the woods are also home to several other nationally and locally rare plant species. Lesser Butterfly-Orchid and White Helleborine are both on the GB Red List for Vascular Plants, while Birds-Nest Orchid, Trailing Tormentil and Wild Strawberry all occur throughout the SSSI and are listed on the Kent Rare Plant Register. Adjacent to the woods and within the vicinity of the proposed development are wildflower meadows containing several other plants listed on the Kent Rare Plant Register, including Field Scabious, Sainfoin, Stinking Chamomile, Fine-Leaved Fumitory and Dwarf Spurge. Cornflower and Wild Clary – also Kent RPR species – can be found in connecting meadows that lie within 1km of the proposed site.

In terms of fauna, a recent survey of part of the SSSI (Woodlands Wood: Ecology of an Ancient Woodland, 2003) identified 16 red list bird species and a further 26 amber list species present. This is an exceptionally high number of rare breeding bird species to be recorded in a single site, exemplifying why the SSSI has been designated for its rich fauna as well as flora. Alongside birds, other protected species present in the SSSI include dormice, badgers, bats and shrews (protected under Schedules 5 and 6 of the Wildlife and Countryside Act 1981).

In the SSSI designation documents, there are 28 listed 'operations likely to damage the special interest'. The proposed development at Site R1 would likely introduce 6 of these identified damaging operations to the area:

9) The release into the site of any wild, feral or domestic animal, plant or seed: the proximity of so many new households to the SSSI would inevitably introduce a large number of household pets and non-native and/or invasive garden plants into the local ecosystem that are not currently there.

10) The killing or removal of any wild animal, including pest control: the proximity of households in the proposed development represents a threat to local populations of wasps, bees and rodents, through habitat loss as a result of construction and through pest removal when these species encroach on new households.

14) The changing of water levels and tables and water utilisation: 3,200 new homes will unavoidably have an impact on local water levels, which has not been adequately accounted for in the proposals.

The SSSI citation highlights how the soil's drainage capacity is central to the woods' ability to support biodiversity.

21) Construction removal or destruction of roads, tracks, walls, fences, hardstands, banks, ditches or other earthworks, or the laying, maintenance or removal of pipelines and cables, above or below ground: the area marked for development at Site R1 directly abuts the boundaries of the SSSI woodland. Construction activity within this zone would cause significant disturbance to species within the SSSI through noise and light pollution, and to species moving between the woodland and adjacent fields. A particular risk in this regard is to pollinator activity. For example, the Fly Orchid, a rare plant previously recorded in the SSSI, relies on a specific species of digger wasp for pollination, which is highly vulnerable to local soil disturbance.

26) Use of vehicles or craft likely to damage or disturb features of interest: through construction traffic and increased recreational traffic on the byway running through the SSSI and neighbouring roads. Even now, the SSSI woods are experiencing problems with motor vehicle users leaving approved PROWs and causing damage to smaller woodland paths and their associated flora. This damaging activity would almost certainly increase with 3,200 extra households close by.

27) Recreational or other activities likely to damage or disturb features of interest: such a large increase in the local population will result in an unprecedented swell of recreational users of the public rights of way through the SSSI. This risks significant harm to fauna and flora through the disturbance of shy mammal, bird and invertebrate species and the destruction of plants through trampling.

Alongside these 6 identified operations, a further damaging impact of the proposed development would be light and noise pollution, resulting from several years of continuous construction activity, followed by residential activity. Both light and noise pollution threaten the breeding and feeding activities of nocturnal animals, as artificial light has been shown to disrupt the circadian rhythms of mammals such as bats. These are sites that have never been introduced to artificial light at any point in history. The rare habitats that have grown accustomed to these conditions would change irrevocably.

In summary, the land within and surrounding the Ileden and Oxenden Woods SSSI represents an ancient woodland, scrub and meadow habitat of the highest tier of ecological importance. This site is rightly designated by the highest level of national protection, yet the proposed development at Site R1 would be the most significant threat the SSSI ever encountered in its history, with the landscape supporting this rare habitat changing beyond recognition. Contrary to the claims in the Draft Local Plan, the development would not improve ecological connectivity to the ancient woodland at this site. This connectivity is already provided by a network of wildflower meadows, environmental management verges and woodland management operations maintained by local landowners and extensively monitored by ecologists.

Instead, the proposed development would involve undertaking 6 operations that have been identified by Natural England as likely to damage the special interest of the SSSI. It would introduce unprecedented pressures on public rights of way usage and water resources, with implications for plant and soil damage. Light and noise pollution, alongside the construction of large residential areas, would cause significant disturbance to pollinator activity and introduce non-native species that are not compatible with a thriving, biodiverse SSSI habitat.

JAL
31/12/2022

Appendix D

Kent Ornithological Society records for South Adisham

(First included in 2023 submission. Please read with Appendix B - Recent Wildlife Summary)

Species	Site	Date(s)	Count
Grey Heron	Adisham (near Aylesham) (TR2253)	18.09.1997	4 (NW 4)
Grey Heron	Adisham (near Aylesham) (TR2253)	26.12.2012	1
Mandarin Duck	Adisham (near Aylesham) (TR2253)	21.02.2008 to 02.03.2008	1
Red Kite	Woodlands Wood (Ileden) (TR2153)	24.04.2003	1
Red Kite	Adisham (near Aylesham) (TR2253)	21.07.2008	1
Hen Harrier	Woodlands Wood (Ileden) (TR2153)	22.11.2002 to 08.04.2003	1
Hen Harrier	Woodlands Wood (Ileden) (TR2153)	21.02.2003 to 20.03.2003	1
Hen Harrier	Adisham (near Aylesham) (TR2253)	27.01.2012	1
Hen Harrier	Adisham (near Aylesham) (TR2253)	09.12.2015	1
Hen Harrier	Adisham (near Aylesham) (TR2253)	20.01.2016	0
Hen Harrier	Woodlands Wood (Ileden) (TR2153)	21.02.2019	1
Hen Harrier	Woodlands Wood (Ileden) (TR2153)	21.02.2019	1
Hen Harrier	Woodlands Wood (Ileden) (TR2153)	21.02.2019	1
Hen Harrier	Adisham (near Aylesham) (TR2253)	21.02.2019	0
Montagu's Harrier	Barham Downs (TR2151)	28.05.1998	1 (N 1)
Montagu's Harrier	Barham Downs (TR2151)	07.08.2014	3
Sparrowhawk	Adisham (near Aylesham) (TR2253)	08.11.1993	1
Sparrowhawk	Woodlands Wood (Ileden) (TR2153)	21.02.2003	6
Sparrowhawk	Woodlands Wood (Ileden) (TR2153)	24.11.2010	1
Common Buzzard	Aylesham (TR2151)	16.10.2001	2
Common Buzzard	Woodlands Wood (Ileden) (TR2153)	22.12.2002 to 14.06.2003	4
Common Buzzard	Woodlands Wood (Ileden) (TR2153)	01.06.2004	2
Common Buzzard	Adisham (near Aylesham) (TR2253)	04.07.2008	1
Common Buzzard	Adisham (near Aylesham) (TR2253)	19.07.2008	1
Common Buzzard	Woodlands Wood (Ileden) (TR2153)	24.11.2010	3
Common Buzzard	Adisham (near Aylesham) (TR2253)	17.01.2011	1
Common Buzzard	Adisham (near Aylesham) (TR2253)	05.01.2012	1
Common Buzzard	Adisham (near Aylesham) (TR2253)	26.12.2012	2
Common Buzzard	Barham Downs (TR2151)	30.03.2016	1
Common Buzzard	Barham Downs (TR2151)	26.01.2017	3

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Common Buzzard	Barham Downs (TR2151)	26.01.2017	3
Kestrel	Woodlands Wood (Ileden) (TR2153)	01.06.2003	4
Kestrel	Woodlands Wood (Ileden) (TR2153)	31.12.2008	1
Kestrel	Adisham (near Aylesham) (TR2253)	31.12.2008	1
Kestrel	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Kestrel	Barham Downs (TR2151)	07.08.2014	2
Kestrel	Barham Downs (TR2151)	26.01.2017	1
Merlin	Woodlands Wood (Ileden) (TR2153)	24.11.2010	1
Hobby	Adisham (near Aylesham) (TR2253)	11.05.1998	2
Hobby	Woodlands Wood (Ileden) (TR2153)	15.06.2003	1
Peregrine	Woodlands Wood (Ileden) (TR2153)	06.01.2003	1
Peregrine	Woodlands Wood (Ileden) (TR2153)	31.03.2003	1
Peregrine	Adisham (near Aylesham) (TR2253)	26.12.2012	1
Red-legged Partridge	Adisham (near Aylesham) (TR2253)	31.12.2008	7
Red-legged Partridge	Woodlands Wood (Ileden) (TR2153)	24.11.2010	18
Red-legged Partridge	Adisham (near Aylesham) (TR2253)	31.05.2011	1
Red-legged Partridge	Adisham (near Aylesham) (TR2253)	19.04.2018	2
Grey Partridge	Woodlands Wood (Ileden) (TR2153)	01.06.2003	2
Grey Partridge	Adisham (near Aylesham) (TR2253)	10.02.2008	3
Grey Partridge	Adisham (near Aylesham) (TR2253)	17.01.2010	2
Grey Partridge	Adisham (near Aylesham) (TR2253)	09.01.2011	3
Grey Partridge	Adisham (near Aylesham) (TR2253)	10.03.2013	1
Pheasant	Woodlands Wood (Ileden) (TR2153)	24.11.2010	8
Pheasant	Adisham (near Aylesham) (TR2253)	26.12.2012	3
Pheasant	Barham Downs (TR2151)	26.01.2017	4
Pheasant	Adisham (near Aylesham) (TR2253)	17.06.2018	2
Great Bustard	Barham Downs (TR2151)	01.01.1909	1
Golden Plover	Adisham (near Aylesham) (TR2253)	31.12.2008	2
Lapwing	Adisham (near Aylesham) (TR2253)	22.09.1992	350
Lapwing	Barham Downs (TR2151)	22.09.1992	240
Lapwing	Woodlands Wood (Ileden) (TR2153)	20.07.2003	510
Lapwing	Adisham (near Aylesham) (TR2253)	02.12.2008	150
Lapwing	Barham Downs (TR2151)	26.01.2017	1
Snipe	Woodlands Wood (Ileden) (TR2153)	31.03.2003	1
Woodcock	Woodlands Wood (Ileden) (TR2153)	22.11.2002 to 06.02.2003	20
Woodcock	Adisham (near Aylesham) (TR2253)	31.12.2008	2

Black-headed Gull	Woodlands Wood (Ileden) (TR2153)	24.11.2010	165
Black-headed Gull	Adisham (near Aylesham) (TR2253)	26.12.2012	12
Common Gull	Woodlands Wood (Ileden) (TR2153)	24.11.2010	74
Common Gull	Adisham (near Aylesham) (TR2253)	26.12.2012	25
Common Gull	Barham Downs (TR2151)	26.01.2017	2
Herring Gull	Woodlands Wood (Ileden) (TR2153)	24.11.2010	9
Herring Gull	Adisham (near Aylesham) (TR2253)	26.12.2012	86
Herring Gull	Barham Downs (TR2151)	07.08.2014	3
Herring Gull	Barham Downs (TR2151)	07.08.2014	10
Herring Gull	Barham Downs (TR2151)	26.01.2017	2
Stock Dove	Woodlands Wood (Ileden) (TR2153)	24.11.2010	7
Stock Dove	Adisham (near Aylesham) (TR2253)	26.12.2012	69
Wood Pigeon	Woodlands Wood (Ileden) (TR2153)	08.12.2002	1100
Wood Pigeon	Woodlands Wood (Ileden) (TR2153)	22.12.2002	1600
Wood Pigeon	Woodlands Wood (Ileden) (TR2153)	27.12.2002	1800
Wood Pigeon	Woodlands Wood (Ileden) (TR2153)	31.01.2003	1600
Wood Pigeon	Woodlands Wood (Ileden) (TR2153)	21.02.2003	2050
Wood Pigeon	Woodlands Wood (Ileden) (TR2153)	24.04.2003	1200
Wood Pigeon	Woodlands Wood (Ileden) (TR2153)	01.06.2003	10
Wood Pigeon	Adisham (near Aylesham) (TR2253)	29.06.2008	2
Wood Pigeon	Woodlands Wood (Ileden) (TR2153)	24.11.2010	265
Wood Pigeon	Adisham (near Aylesham) (TR2253)	26.12.2012	52
Wood Pigeon	Barham Downs (TR2151)	07.08.2014	12
Wood Pigeon	Barham Downs (TR2151)	07.08.2014	12
Wood Pigeon	Barham Downs (TR2151)	26.01.2017	0
Wood Pigeon	Adisham (near Aylesham) (TR2253)	17.06.2018	5
Wood Pigeon	Adisham (near Aylesham) (TR2253)	20.06.2018	4
Collared Dove	Adisham (near Aylesham) (TR2253)	29.06.2008	4
Collared Dove	Woodlands Wood (Ileden) (TR2153)	24.11.2010	4
Collared Dove	Adisham (near Aylesham) (TR2253)	26.12.2012	8
Collared Dove	Barham Downs (TR2151)	07.08.2014	2
Collared Dove	Adisham (near Aylesham) (TR2253)	17.06.2018	2
Collared Dove	Adisham (near Aylesham) (TR2253)	20.06.2018	8
Turtle Dove	Woodlands Wood (Ileden) (TR2153)	01.06.2003	4
Cuckoo	Woodlands Wood (Ileden) (TR2153)	01.06.2003	2
Barn Owl	Adisham (near Aylesham) (TR2253)	08.04.2011	1
Little Owl	Woodlands Wood (Ileden) (TR2153)	01.06.2003	2
Little Owl	Woodlands Wood (Ileden) (TR2153)	24.11.2010	1

Little Owl	Adisham (near Aylesham) (TR2253)	20.06.2018	2
Tawny Owl	Woodlands Wood (Ileden) (TR2153)	27.02.2003 to 14.05.2003	6
Tawny Owl	Adisham (near Aylesham) (TR2253)	01.01.2012	2
Tawny Owl	Adisham (near Aylesham) (TR2253)	01.01.2013	1
Long-eared Owl	Adisham (near Aylesham) (TR2253)	01.01.2013	1
Swift	Woodlands Wood (Ileden) (TR2153)	04.05.2003	15
Swift	Adisham (near Aylesham) (TR2253)	22.07.2019	14
Hoopoe	Adisham (near Aylesham) (TR2253)	15.06.2015	1
Hoopoe	Adisham (near Aylesham) (TR2253)	15.06.2015	1
Wryneck	Adisham (near Aylesham) (TR2253)	02.05.1986	1
Green Woodpecker	Woodlands Wood (Ileden) (TR2153)	01.06.2003	2
Green Woodpecker	Adisham (near Aylesham) (TR2253)	31.12.2008	1
Green Woodpecker	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Green Woodpecker	Adisham (near Aylesham) (TR2253)	26.12.2012	1
Green Woodpecker	Barham Downs (TR2151)	07.08.2014	2
Green Woodpecker	Woodlands Wood (Ileden) (TR2153)	21.02.2019	2
Great Spotted Woodpecker	Woodlands Wood (Ileden) (TR2153)	01.06.2003	6
Great Spotted Woodpecker	Adisham (near Aylesham) (TR2253)	31.12.2008	3
Great Spotted Woodpecker	Woodlands Wood (Ileden) (TR2153)	24.11.2010	3
Great Spotted Woodpecker	Adisham (near Aylesham) (TR2253)	26.12.2012	1
Great Spotted Woodpecker	Barham Downs (TR2151)	26.01.2017	1
Great Spotted Woodpecker	Adisham (near Aylesham) (TR2253)	17.06.2018	1
Great Spotted Woodpecker	Woodlands Wood (Ileden) (TR2153)	21.02.2019	4
Lesser Spotted Woodpecker	Woodlands Wood (Ileden) (TR2153)	01.06.2003	4
Skylark	Woodlands Wood (Ileden) (TR2153)	01.06.2003	3
Skylark	Adisham (near Aylesham) (TR2253)	31.12.2008	2
Skylark	Woodlands Wood (Ileden) (TR2153)	24.11.2010	8
Skylark	Adisham (near Aylesham) (TR2253)	26.12.2012	17
Skylark	Barham Downs (TR2151)	07.08.2014	2
Skylark	Barham Downs (TR2151)	26.01.2017	6
Skylark	Barham Downs (TR2151)	26.01.2017	6
Swallow	Adisham (near Aylesham) (TR2253)	22.09.1992	600 (SW)
Swallow	Barham Downs (TR2151)	07.08.2014	6
House Martin	Adisham (near Aylesham) (TR2253)	22.09.1992	100 (SW)
Meadow Pipit	Barham Downs (TR2151)	22.09.1992	100
Meadow Pipit	Adisham (near Aylesham) (TR2253)	31.12.2008	7
Meadow Pipit	Woodlands Wood (Ileden) (TR2153)	24.11.2010	3
Meadow Pipit	Adisham (near Aylesham) (TR2253)	26.12.2012	7

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Yellow Wagtail	Barham Downs (TR2151)	07.08.2014	4
Grey Wagtail	Woodlands Wood (Ileden) (TR2153)	24.11.2010	1
Pied Wagtail	Adisham (near Aylesham) (TR2253)	31.12.2008	2
Pied Wagtail	Woodlands Wood (Ileden) (TR2153)	24.11.2010	3
Wren	Woodlands Wood (Ileden) (TR2153)	01.06.2003	16
Wren	Woodlands Wood (Ileden) (TR2153)	24.11.2010	10
Wren	Adisham (near Aylesham) (TR2253)	26.12.2012	5
Wren	Barham Downs (TR2151)	26.01.2017	0
Dunnock	Woodlands Wood (Ileden) (TR2153)	01.06.2003	6
Dunnock	Adisham (near Aylesham) (TR2253)	31.12.2008	0
Dunnock	Woodlands Wood (Ileden) (TR2153)	24.11.2010	14
Dunnock	Adisham (near Aylesham) (TR2253)	26.12.2012	15
Dunnock	Barham Downs (TR2151)	26.01.2017	5
Dunnock	Barham Downs (TR2151)	26.01.2017	5
Robin	Woodlands Wood (Ileden) (TR2153)	01.06.2003	18
Robin	Adisham (near Aylesham) (TR2253)	31.12.2008	0
Robin	Woodlands Wood (Ileden) (TR2153)	24.11.2010	6
Robin	Adisham (near Aylesham) (TR2253)	26.12.2012	8
Robin	Barham Downs (TR2151)	07.08.2014	2
Robin	Barham Downs (TR2151)	26.01.2017	0
Robin	Adisham (near Aylesham) (TR2253)	17.06.2018	2
Redstart	Barham Downs (TR2151)	22.09.1992	2
Whinchat	Adisham (near Aylesham) (TR2253)	05.09.1993	2
Wheatear	Barham Downs (TR2151)	22.09.1992	2
Blackbird	Woodlands Wood (Ileden) (TR2153)	01.06.2003	8
Blackbird	Woodlands Wood (Ileden) (TR2153)	24.11.2010	18
Blackbird	Adisham (near Aylesham) (TR2253)	26.12.2012	24
Blackbird	Barham Downs (TR2151)	07.08.2014	1
Blackbird	Barham Downs (TR2151)	26.01.2017	20
Blackbird	Adisham (near Aylesham) (TR2253)	17.06.2018	1
Blackbird	Woodlands Wood (Ileden) (TR2153)	21.02.2019	5
Fieldfare	Woodlands Wood (Ileden) (TR2153)	27.12.2002	300
Fieldfare	Woodlands Wood (Ileden) (TR2153)	26.02.2003	569
Fieldfare	Woodlands Wood (Ileden) (TR2153)	24.11.2010	6
Fieldfare	Adisham (near Aylesham) (TR2253)	26.12.2012	23
Song Thrush	Woodlands Wood (Ileden) (TR2153)	01.06.2003	6
Song Thrush	Adisham (near Aylesham) (TR2253)	31.12.2008	0
Song Thrush	Woodlands Wood (Ileden) (TR2153)	24.11.2010	3

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Song Thrush	Adisham (near Aylesham) (TR2253)	26.12.2012	1
Song Thrush	Woodlands Wood (Ileden) (TR2153)	28.04.2013	0
Song Thrush	Barham Downs (TR2151)	26.01.2017	5
Song Thrush	Barham Downs (TR2151)	26.01.2017	5
Redwing	Woodlands Wood (Ileden) (TR2153)	24.11.2010	3
Redwing	Adisham (near Aylesham) (TR2253)	26.12.2012	2
Redwing	Barham Downs (TR2151)	26.01.2017	1
Redwing	Barham Downs (TR2151)	26.01.2017	1
Mistle Thrush	Woodlands Wood (Ileden) (TR2153)	11.05.2003	5
Mistle Thrush	Adisham (near Aylesham) (TR2253)	31.12.2008	3
Mistle Thrush	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Mistle Thrush	Adisham (near Aylesham) (TR2253)	28.04.2012	2
Mistle Thrush	Adisham (near Aylesham) (TR2253)	26.12.2012	2
Mistle Thrush	Woodlands Wood (Ileden) (TR2153)	28.04.2013	0
Mistle Thrush	Barham Downs (TR2151)	26.01.2017	3
Mistle Thrush	Barham Downs (TR2151)	26.01.2017	3
Whitethroat	Barham Downs (TR2151)	07.08.2014	2
Whitethroat	Adisham (near Aylesham) (TR2253)	17.06.2018	2
Whitethroat	Adisham (near Aylesham) (TR2253)	20.06.2018	1
Garden Warbler	Woodlands Wood (Ileden) (TR2153)	01.06.2003	2
Blackcap	Woodlands Wood (Ileden) (TR2153)	01.06.2003	6
Chiffchaff	Adisham (near Aylesham) (TR2253)	22.09.1992	2
Chiffchaff	Woodlands Wood (Ileden) (TR2153)	01.06.2003	6
Willow Warbler	Woodlands Wood (Ileden) (TR2153)	01.06.2003	7
Goldcrest	Woodlands Wood (Ileden) (TR2153)	01.06.2003	4
Goldcrest	Adisham (near Aylesham) (TR2253)	31.12.2008	2
Goldcrest	Adisham (near Aylesham) (TR2253)	26.12.2012	5
Goldcrest	Woodlands Wood (Ileden) (TR2153)	28.04.2013	0
Goldcrest	Barham Downs (TR2151)	26.01.2017	2
Goldcrest	Barham Downs (TR2151)	26.01.2017	2
Spotted Flycatcher	Adisham (near Aylesham) (TR2253)	22.09.1992	1
Spotted Flycatcher	Woodlands Wood (Ileden) (TR2153)	14.06.2003	1
Spotted Flycatcher	Adisham (near Aylesham) (TR2253)	01.06.2008	2
Spotted Flycatcher	Adisham (near Aylesham) (TR2253)	29.06.2008	2
Long-tailed Tit	Woodlands Wood (Ileden) (TR2153)	01.06.2003	6
Long-tailed Tit	Adisham (near Aylesham) (TR2253)	31.12.2008	7

Long-tailed Tit	Woodlands Wood (Ileden) (TR2153)	24.11.2010	5
Long-tailed Tit	Adisham (near Aylesham) (TR2253)	26.12.2012	6
Long-tailed Tit	Barham Downs (TR2151)	26.01.2017	7
Long-tailed Tit	Barham Downs (TR2151)	26.01.2017	7
Long-tailed Tit	Adisham (near Aylesham) (TR2253)	20.06.2018	5
Marsh Tit	Woodlands Wood (Ileden) (TR2153)	01.06.2003	4
Marsh Tit	Walk Wood (TR208521)	23.07.2015	2
Coal Tit	Woodlands Wood (Ileden) (TR2153)	01.06.2003	6
Coal Tit	Adisham (near Aylesham) (TR2253)	31.12.2008	2
Coal Tit	Woodlands Wood (Ileden) (TR2153)	24.11.2010	4
Coal Tit	Woodlands Wood (Ileden) (TR2153)	28.04.2013	0
Coal Tit	Barham Downs (TR2151)	26.01.2017	3
Coal Tit	Barham Downs (TR2151)	26.01.2017	3
Coal Tit	Woodlands Wood (Ileden) (TR2153)	21.02.2019	3
Blue Tit	Woodlands Wood (Ileden) (TR2153)	01.06.2003	20
Blue Tit	Woodlands Wood (Ileden) (TR2153)	24.11.2010	13
Blue Tit	Adisham (near Aylesham) (TR2253)	26.12.2012	12
Blue Tit	Barham Downs (TR2151)	26.01.2017	0
Blue Tit	Adisham (near Aylesham) (TR2253)	17.06.2018	8
Blue Tit	Adisham (near Aylesham) (TR2253)	20.06.2018	4
Blue Tit	Woodlands Wood (Ileden) (TR2153)	21.02.2019	6
Great Tit	Woodlands Wood (Ileden) (TR2153)	01.06.2003	10
Great Tit	Woodlands Wood (Ileden) (TR2153)	24.11.2010	14
Great Tit	Adisham (near Aylesham) (TR2253)	26.12.2012	10
Great Tit	Barham Downs (TR2151)	26.01.2017	0
Great Tit	Adisham (near Aylesham) (TR2253)	17.06.2018	4
Great Tit	Adisham (near Aylesham) (TR2253)	20.06.2018	4
Great Tit	Woodlands Wood (Ileden) (TR2153)	21.02.2019	9
Treecreeper	Woodlands Wood (Ileden) (TR2153)	01.06.2003	12
Treecreeper	Woodlands Wood (Ileden) (TR2153)	24.11.2010	1
Treecreeper	Adisham (near Aylesham) (TR2253)	26.12.2012	2
Treecreeper	Walk Wood (TR208521)	23.07.2015	2
Treecreeper	Woodlands Wood (Ileden) (TR2153)	21.02.2019	3
Golden Oriole	Adisham (near Aylesham) (TR2253)	26.05.1986	1
Jay	Adisham (near Aylesham) (TR2253)	31.12.2008	0
Jay	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Jay	Adisham (near Aylesham) (TR2253)	26.12.2012	1
Jay	Barham Downs (TR2151)	26.01.2017	1

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Jay	Adisham (near Aylesham) (TR2253)	20.06.2018	4
Magpie	Woodlands Wood (Ileden) (TR2153)	24.11.2010	9
Magpie	Adisham (near Aylesham) (TR2253)	26.12.2012	11
Magpie	Barham Downs (TR2151)	26.01.2017	0
Magpie	Adisham (near Aylesham) (TR2253)	17.06.2018	2
Jackdaw	Woodlands Wood (Ileden) (TR2153)	27.12.2002	116
Jackdaw	Adisham (near Aylesham) (TR2253)	31.12.2008	0
Jackdaw	Woodlands Wood (Ileden) (TR2153)	24.11.2010	24
Jackdaw	Adisham (near Aylesham) (TR2253)	26.12.2012	22
Jackdaw	Woodlands Wood (Ileden) (TR2153)	28.04.2013	0
Jackdaw	Barham Downs (TR2151)	07.08.2014	18
Rook	Woodlands Wood (Ileden) (TR2153)	24.11.2010	11
Rook	Adisham (near Aylesham) (TR2253)	26.12.2012	55
Carrion Crow	Woodlands Wood (Ileden) (TR2153)	24.11.2010	21
Carrion Crow	Adisham (near Aylesham) (TR2253)	26.12.2012	14
Carrion Crow	Barham Downs (TR2151)	07.08.2014	4
Carrion Crow	Barham Downs (TR2151)	07.08.2014	3
Carrion Crow	Barham Downs (TR2151)	26.01.2017	4
Raven	Adisham (near Aylesham) (TR2253)	04.02.2017	2
Starling	Adisham (near Aylesham) (TR2253)	29.06.2008	5
Starling	Woodlands Wood (Ileden) (TR2153)	24.11.2010	1
Starling	Adisham (near Aylesham) (TR2253)	26.12.2012	21
House Sparrow	Adisham (near Aylesham) (TR2253)	05.09.1993	200
House Sparrow	Adisham (near Aylesham) (TR2253)	29.06.2008	1
House Sparrow	Woodlands Wood (Ileden) (TR2153)	24.11.2010	13
House Sparrow	Adisham (near Aylesham) (TR2253)	26.12.2012	26
House Sparrow	Adisham (near Aylesham) (TR2253)	17.06.2018	20
House Sparrow	Adisham (near Aylesham) (TR2253)	20.06.2018	10
Chaffinch	Woodlands Wood (Ileden) (TR2153)	01.06.2003	10
Chaffinch	Adisham (near Aylesham) (TR2253)	29.06.2008	2
Chaffinch	Adisham (near Aylesham) (TR2253)	31.12.2008	0
Chaffinch	Woodlands Wood (Ileden) (TR2153)	24.11.2010	13
Chaffinch	Adisham (near Aylesham) (TR2253)	26.12.2012	28
Chaffinch	Barham Downs (TR2151)	07.08.2014	7
Chaffinch	Barham Downs (TR2151)	26.01.2017	0
Chaffinch	Adisham (near Aylesham) (TR2253)	17.06.2018	4
Chaffinch	Adisham (near Aylesham) (TR2253)	20.06.2018	4
Greenfinch	Adisham (near Aylesham) (TR2253)	31.12.2008	0

Greenfinch	Woodlands Wood (Ileden) (TR2153)	24.11.2010	4
Greenfinch	Adisham (near Aylesham) (TR2253)	26.12.2012	2
Greenfinch	Adisham (near Aylesham) (TR2253)	17.06.2018	2
Goldfinch	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Goldfinch	Adisham (near Aylesham) (TR2253)	26.12.2012	3
Goldfinch	Adisham (near Aylesham) (TR2253)	17.06.2018	4
Goldfinch	Adisham (near Aylesham) (TR2253)	20.06.2018	2
Siskin	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Linnet	Adisham (near Aylesham) (TR2253)	22.09.1992	220
Linnet	Adisham (near Aylesham) (TR2253)	31.12.2008	1
Linnet	Adisham (near Aylesham) (TR2253)	26.12.2012	33
Linnet	Barham Downs (TR2151)	07.08.2014	2
Linnet	Barham Downs (TR2151)	07.08.2014	1
Linnet	Adisham (near Aylesham) (TR2253)	17.06.2018	2
Lesser Redpoll	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Lesser Redpoll	Adisham (near Aylesham) (TR2253)	26.12.2012	1
Common Crossbill	Cold Harbour Farm nr Bridge	20.06.2011	38
Bullfinch	Adisham (near Aylesham) (TR2253)	31.12.2008	2
Bullfinch	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Bullfinch	Barham Downs (TR2151)	26.01.2017	2
Bullfinch	Barham Downs (TR2151)	26.01.2017	2
Bullfinch	Woodlands Wood (Ileden) (TR2153)	21.02.2019	4
Hawfinch	Woodlands Wood (Ileden) (TR2153)	01.06.2002	2
Hawfinch	Woodlands Wood (Ileden) (TR217524)	26.06.2002	5
Hawfinch	Woodlands Wood (Ileden) (TR2153)	24.03.2003 to 23.05.2003	3
Yellowhammer	Woodlands Wood (Ileden) (TR2153)	24.11.2010	5
Yellowhammer	Adisham (near Aylesham) (TR2253)	26.12.2012	13
Yellowhammer	Barham Downs (TR2151)	07.08.2014	2
Yellowhammer	Adisham (near Aylesham) (TR2253)	20.06.2018	5
Reed Bunting	Woodlands Wood (Ileden) (TR2153)	24.11.2010	1
Reed Bunting	Adisham (near Aylesham) (TR2253)	26.12.2012	6
Reed Bunting	Barham Downs (TR2151)	26.01.2017	3
Reed Bunting	Barham Downs (TR2151)	26.01.2017	3
Corn Bunting	Adisham (near Aylesham) (TR2253)	26.12.2012	14
Corn Bunting	Barham Downs (TR2151)	07.08.2014	4
Corn Bunting	Adisham (near Aylesham) (TR2253)	17.06.2018	4

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Corn Bunting	Adisham (near Aylesham) (TR2253)	19.06.2018	2
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Appendix E

Flood map for Adisham and Bloodden

Source: KCC

