

# **Conserve Adisham's Rural Environment's response to the draft 2045 Canterbury Local Plan (regulation 18 consultation)**

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**[Please note: throughout this response, 'Cooting Farm Community Garden Scheme' is termed 'Adisham New Town']**

**Conserve Adisham's Rural Environment (CARE):** CARE is an action group based in the Parish of Adisham, active when there is a major threat to the countryside of our parish and to the rural character of our village. It has been relaunched to oppose Canterbury City Council's (CCC) scheme for a 3,200-house new town joining Adisham to Aylesham (which neither community wants), ending its 1,400 years of recorded history as a separate community. The 'Community Garden Scheme' would be sited against the B2046 and the boundary with Dover District Council (DDC). Adisham also stands shoulder-to-shoulder with its neighbour, Womenswold, where CCC proposes a 420-house ('minimum') estate also be sited against Aylesham Parish and the DDC boundary.

<https://www.facebook.com/groups/853486756074549/>

<https://www.adisham-countryside.com/>

## **Executive Summary**

The R1 Adisham New Town idea (*Cooting Farm Community Garden Scheme*) is fundamentally flawed and CARE urges Canterbury City Council (CCC) to strike it from the plan before the regulation 19 draft is issued. If it remains in the plan, Adisham Parish Council intend to be represented at the Examination-in-Public (EiP). In our opinion, the R1 Adisham New Town is not deliverable, not sound and not sustainable.

There are certain things about R1 Adisham New Town that can never be ameliorated: the end of Adisham's existence as a separate, independent, close rural community; the massive loss of a prominent area of classic and historic, open North Downs landscape; and the complete destruction of much prime and superbly productive farmland.

We are deeply concerned that the Adisham New Town proposal has been assessed on the huge assumption that a modern train station will be provided, to replace what is now a halt. Given that this remains entirely uncertain and with no commitment from Network Rail at a time of considerable budget cuts and uncertain economic growth, we think that it is misleading for the sustainable travel aspect of policy R1 to be based upon the assumption that an essentially new rail station will be provided, big enough and modern enough to serve a new town.

R1 Adisham New Town and R20 Womenswold are based on a now defunct housing policy. With Michael Gove's letter to local authorities (5 December 2022), the old developer-led approach to housing policy in England is giving way to a community-led approach that is based on meeting housing need rather than,

as previously, developer-led market demand. These changes are reflected in the LUR Bill going through Parliament, so it is not realistic thinking that these changes can be waved away. The need perceived by CCC, to parachute a new settlement of 3,200 new housing units onto a green field site in our parish with absolutely no infrastructure as well as 420 'minimum' units onto similar land in Adisham's neighbour Womenswold, is a relic of the old, redundant housing policy. The 3,620 housing units can now be dropped.

It is true that we do not yet know what a community-led housing policy looks like. However, we can be sure that one feature is that the nationally derived housing target, even though theoretically not mandatory but in reality imposed on CCC, becomes 'advisory' from now. As the Secretary of State states, there is also no 'Five-Year Supply Rule'. CCC can focus on identifying and meeting local housing need. CARE urges CCC to become a leader in a community-led housing policy.

Another feature will be a renewed focus on previously developed land inside settlement boundaries, with some urban extensions, is consistent with the thrust of the NPPF (National Planning Policy Framework). At paragraphs 119 and 120, the NPPF encourages the use of this specifically defined brownfield land while also recognising the benefits of rural land for both development and other functions, such as wildlife, recreation and food production. In all instances with the new approach, 'brownfield-first' approach should be taken and that only locations 'within settlement confines' should be considered sustainable for the purposes of the Canterbury Plan.

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**Note: throughout this response, what are technically 'housing units' are referred to as 'houses'.**

## **A. R1 – THREE FACTORS THAT CAN NEVER BE AMELIORATED**

**1<sup>st</sup> – Adisham’s identity** - R1 will end Adisham’s long history as a separate, independent, close, rural community (and R21 would do nothing for Adisham except urbanise it).

It is ironic that in 2023, marking the 1,400<sup>th</sup> year since Adisham entered written records in 623AD/CE, that our community is obliged to fight an existential threat. Furthermore, there is archaeological evidence going back past the Iron Age to the Bronze Age that people were living here for at least 4-5,000 years.

The idea that Adisham’s existence and identity can be maintained with an undeveloped strip between Adisham Village (200 houses and 350 inhabitants) and Adisham New Town (3,200 housing units) is laughable and cannot be taken seriously. Everyone who visits the site can see that R1 Adisham New Town will, in reality, swamp Adisham and join it to Aylesham PC (which neither community wants).

If Dover DC’s ‘South Aylesham’ extension goes ahead, as in the draft Dover Local Plan (regulation 19 version) and if both CCC’s R1 Adisham New Town (given the warm title ‘Cooting Farm Community Garden Scheme’ in the Canterbury plan) and CCC’s confusingly-named R20 ‘Aylesham South’ are in the final Canterbury Plan together, the resulting conurbation will be enormous.

**R21 - Adisham PC ‘strongly disagrees’ with R21, as it specifically relates to Adisham – the ‘Local Service Centre’ proposed near to the railway station.**

Policy R21 may be appropriate to other settlements but not to Adisham. The fact is that Adisham is already a sustainable community, where people look out for each other and where there are small-scale endeavours (like Big Breakfast, the Litter Pick etc) which keep us going. Most of us are here because we love our community. We have a much-loved village school. Ancient Holy Innocents Church has been sensitively



updated to allow it to be a secular community space (such as the Late Queen's Platinum Jubilee 'tea & cakes with karaoke') while remaining as a sacred space of worship and the venue for events which bind the community together like namings, weddings and funerals. We also have a much-used village hall (in need of replacement).

In the last 80 years, much has changed in Adisham with the loss of: two general stores, the Post Office, the Bulls Head pub (going back to Tudor times at least) and Moor's Head Inn, the Baptist Chapel, draper shop, butcher, baker, market garden, coal hauliers, coffin-maker, village undertaker, tea-room, off-licence, care home, sweet shop and bee-keeping business. Adisham has also seen the reduction in the number of farms by consolidation, the loss of the police house with the officer based there and, before that, the forge and at least two windmills.

However, most people in Adisham do not want to return to the past but neither do they want a shopping mall in the parish (as represented by R21). R21 is seen, as it clearly should be, as part of R1 Adisham New Town. Most residents stay here or move here because they value the tranquillity and beauty of the area, clean air, the friendship and the sense of community. New forms of community develop without heavy-handed 'assistance' from above, book clubs, dance & yoga sessions, the Eclectics choir, musical events and talks, public interest groups (*Sustainable Adisham*, WOA and CARE) and so on. A sense of community is now enhanced by greater numbers of people now working in the village, either in their home office or using their home as a base for visiting clients, patients or customers. Car journeys to buy provisions are reduced by increased delivery services and more innovation in the delivery of products can be expected. A new tea-room has appeared in the building occupied by one of the lost services. A village hall, perhaps two-storey with consultation rooms for the provision of health services or training or for committee meetings for example, would help to maintain Adisham's excellent community spirit into the 22<sup>nd</sup> C, in a way that the R21 Local Service Centre/shopping mall would completely fail to do. We expect both the church and the village hall to be used with even greater creativity in the future; e.g. one current idea is to open the village hall one day a week, for people to work together with their laptops, with shared heating, also partly to overcome the loss of office camaraderie. It is the venue for the occasional 'Pop Up Bar (PUB)', the Supper Club and the Games Evening. New enterprises have appeared among disused farm buildings such as a livery stable, dog training and dog grooming. A dog exercise

business now operates on the famous Z-Field where farmer Reynolds developed the swede. Our much-loved village school, which survived an attempt in the 1980s to close it, flourishes. On the whole, apart from traffic and road safety, just small tweaks from CCC are needed to maintain Adisham as it is, with appropriate and targeted growth in housing and future rural employment opportunities.

The mention of new parks and access to green spaces to justify R1 Adisham New Town caused grim amusement in the parish. Adisham is already incredibly well endowed with dramatic open spaces, tranquil ancient woodland and a well-signed network of PROWS (public rights of way). The plan can do nothing to enhance our already excellent access to 'green spaces'.

## **2<sup>nd</sup> – Landscape - R1 will cause massive loss of a huge and prominent area of classic and historic, open North Downs landscape**

The North Downs, the striking chalk range starting with the Kent Downs going through to the Surrey Hills, is important and it is rightly celebrated. Throughout its length and starting in East Kent, its natural post-Ice Age geology combined with 5,000 years of human activity has shaped North Downs so that its landscapes are both gently beautiful and magnificent, mysterious and full of meaning.

If you stand by the Adisham trig point (OS Explorer 150, 215 541) and look towards Thanet, you will see that the Parish of Adisham is where the North Downs rise.

## **National & local landscape policies which mean CCC must strike out R1**

\* CCC's own 'Landscape Character Assessment & Biodiversity Appraisal', (October 2020) pages 277-282 – shows that R1 and R20 are directly contrary to the conclusions and recommendations – 'the key sensitivities & values'; also with 'Landscape Guidelines and Key Habitat Opportunities' – 'Landscape Management & Development Management'. It is difficult to

understand the process by which the site selection for R1 and R20 took place, when CCC possessed this knowledge.

The section 'Adisham Arable Downland' in the document above emphasises the importance of the land at Cooting (and at Womenswold) as sharing similar character to the adjacent AONB (the Area of Outstanding Natural Beauty, nationally-designated on the basis that the landscape is equivalent in quality to that of a national park). R1 would also be the death-knell of hopes that the AONB boundary would (at AONB boundary review) be extended east to cover all *Adisham Arable Land* (landscape type 11) and *Bramling Downland* (type 12) to the A256 (certainly to the railway line) and south to the B2046.

\* *Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026* (Kent Downs AONB Unit) underlines the fact that the land that would be destroyed by R1 Adisham New Town is part of what is defined as 'the setting for the AONB' (see 1.2 and 3.3).

*'Often the setting of the Kent Downs has great value and was a principle reason for the Kent Downs AONB designation'*

*'The setting of the Kent Downs AONB is broadly speaking the land outside the designated area which is visible from the AONB and from which the AONB can be seen, but may be wider when affected by intrusive features beyond that ...'*

\* Kent Downs AONB 'Setting Position Statement' (Updated February 2022):

*'A recent Appeal decision has confirmed that where a proposal is outside of an AONB, the effect on views outside of the AONB, but gained from within the AONB would result in NPPF paragraph 176 being relevant.*

*Amendments to the NPPF in July 2021 included reference to setting now being incorporated into the NPPF for the first time: 1 Appeal Ref: APP/G1630/W/20/3256319 Land off Ashmead Drive, Gotherington 4 "...while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas".'*

\* National Government's *Planning Policy Guidance* (PPG):

Advice on how to approach development within an AONB setting is expanded on in the Planning Practice Guidance (PPG). This confirms that the Duty of Regard is relevant in considering proposals located outside of AONB boundaries, but which might have an impact on their setting or protection. The PPG also refers to guidance produced by Defra on the 'Duty of Regard'. Defra's guidance confirms that this can be relevant outside of the AONB boundary: 'Additionally, it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these area'.

The PPG goes on to state that: *'Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account'.*

The views out from the chalk scarp of the Kent Downs over its setting was a key reason for the designation of the Kent Downs AONB back in 1968. This feature has remained critical to its value and to public enjoyment ever since and today is recognised as one of its special characteristics and qualities.

\* National Planning Policy Framework (NPPF) – see 'farmland section below' below.

\* Plan policy R28 – 'Countryside': We support R28 but sections 1, 2 and 3 of R28 are failed by R1.

\* Plan policy DS18 'Habitats & landscapes of national importance': We support R28 but R1 Adisham New Town would result in the failures of S1

and S2 of DS18. We are gravely concerned by the negative impact of R1 on S4, S5 and S7 of DS18 (as far as the impact on Adisham's five SSSI woods, all of which are also registered on the Ancient Woodland Inventory).

\* Plan policy DS22 'Landscape character': We support DS22 but proceeding with R1 would mean failing every section of DS22 including S1, S2 (except S2f) and S3, which Adisham PC was glad to read, states 'Proposals for development which would cause significant harm to the landscape character of an area will be refused').

\* The Local Designation Review proposes trimming those parts of the AHLV/LLD covered by the AONB. We support this. Neither LCA nor LLD support strategic-scale development in the R1 and R20 locations. As both LCA and LLD correctly make much of the character of the land in question being open, the need to avoid large scale development and the importance of the land in comprising the setting to the AONB, and sharing similar characteristics, is further emphasised.

\* In 1995, Canterbury City Council made a Conservation Order covering, among other things, the village of Adisham and the hamlets of Bloodden and Cooting, on account of the attractive character and interest of the area. R1 would utterly negate the reasons for this protective designation.

#### Two external perspectives on Adisham's rural landscape

First, the *North Downs Way National Trail* is one of sixteen National Trails showcasing Britain's most beautiful landscapes. The trail follows an international pilgrim route dating back to the Middle Ages. Pilgrims would originally travel to Canterbury Cathedral and then onward to Winchester Cathedral. The North Downs Way is also a part of the *Via Francigena Pilgrim Route*, which starts in Rome and ends at Canterbury Cathedral. One of the great views from this international way is when, going north to Canterbury, you enter our Parish.

Looking right, you take in the dry river valley towards Wingham. R1 Adisham New Town will literally be the blot on this wonderful open landscape, wrecking one of the finest views in Kent. You then come to a specially commissioned bench:

*'Sedile Francigena is a bench that aspires to extend the perspective for those that use the bench. A bench on a walk is a place to stop and rest and to consider the beautiful setting, but potentially also more. This bench uses its form, scale and a carefully chosen quantity of surface mapping to introduce a sense of scale, an appreciation of the bigger picture'. (Christopher Daniel, Polysemic)*

Second, Sustrans popular National Cycle Network Regional Route 16 goes through our parish. R1 Adisham New Town would cause NCN 16 to fail the key Sustrans criterion, 'Be traffic-free or a quiet-way', part of the reason for the selection of Adisham roads by Sustrans (along with beautiful landscape). Putting aside the fact that Adisham's country roads would be flooded with cars as a result of R1, NCN 16 would be on the edge of Adisham New Town as it leaves the parish to the south.

**Please see photographic Appendix E – 'The beauty of the countryside at the R1 site and its setting'.**

### **3<sup>rd</sup> – Farmland - R1 would destroy much prime & superbly-productive land**

R1 Adisham New Town cannot be considered appropriate because it will result in significant loss of prime and versatile agricultural land at the very time that our country needs such land. 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 (ref CPRE). It also appears that this figure is increasing, with there being a 100-fold increase in 2022 from that built on in 2010. This loss cannot continue to be ignored. As you would expect in a parish with a notable agricultural history (for example, the 'Reynolds Turnip' now known as the 'Swede' was first grown in Adisham's Z-Field) and a strong identification with farming, it is our view that the R1 site selection is completely wrong. We have already stated our belief that the New Town concept itself should be abandoned.

While we recognise that the National Planning Policy Framework (NPPF) is being updated, R1 Adisham New Town appears to be at variance with national policy as expressed in the current version of the NPPF:

*'Planning policies and decisions should contribute to and enhance the natural and local environment...'* by *'recognising the intrinsic character and beauty of the countryside and the wider benefits from the natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land...'*.

The NPPF also contains the following definition:

*'Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification'*.

Elsewhere the NPPF states: *'At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'*.

R1 Adisham New Town simply cannot be defined as *'sustainable development'*.

## **B. INFRASTRUCTURE IN FIRST.**

### 'Fine words butter no parsnips!'

There are plenty of aspirational words in the draft plan about things that Canterbury City Council would like to happen or desirable things will happen. But the reality of local plans is very different. We know that the plan is not the draft of a legal agreement between CCC and the residents of the district. Some things will not happen because there is no budget, the policy or scheme is not CCC's to direct and, in the case of R1, the cost of purchasing just Cooting Farm (believed to be around £50 million) will leave developers with relatively little money to fund the necessary checks, assessments and tests to say nothing of the schools etc.

But there are several items of infrastructure that must, in our opinion, be in place before any housebuilding starts.

### Embedding Grampian Principles in and through-out the plan

The imposition of Grampian Principles through the planning system is increasingly seen as an appropriate way of dealing with the problems identified in pages 12-21 below. This is particularly needed both with sewage facilities and transport infrastructure. CCC should make R1 and R20 conditional upon there being in place: first, adequate sewerage treatment and disposal facilities to cater for the requirements of the final sizes of R1 and R20 and, second, the completion of the upgrading of transport infrastructure. This should be in place before a single house is built.



**Factors that the draft Canterbury Plan suggests can be mitigated or implies that CCC has the budgetary and/or policy wherewithal to ensure these factors dealt with adequately.**

- **R1 will cause a huge increase in road traffic locally**

In our summary above, we point out that a budget to upgrade Adisham railway station to service R1 Adisham New Town is not in CCC's bailiwick and, in the current national/international economic situation, we suggest that this is far-fetched.

Even if such a railway station was built, the increase in road traffic would be off-the-scale. Local roads would be flooded with traffic and the 'rat-run', for example, through Adisham, along the Downs Road would become even more perilous than it already is. Gridlock would be caused around Aylesham, Wingham, Bekesbourne, Patricxbourne, Littlebourne, the A2 junction and the approach roads into Canterbury.

In any case, the position of Adisham railway station would not work for the proposed new town. As was shown with the proposed railway station at Mountfield new town, a station built on the edge of the new settlement will not significantly reduce car traffic.

The road infrastructure is totally inadequate to the extra 3,200 houses that would be built in the new town especially when added to 420 houses ('minimum') that CCC plan in Womenswold and, in the Dover Plan, 640 at 'South Aylesham' (joining Aylesham and Snowdown). How is it that CCC thinks this scheme is sustainable when, on the other side of the B2046, Dover DC have cut their housing plans by 500 houses (the 'North Aylesham' expansion of Aylesham) partly because that authority recognises the weakness of the traffic infrastructure?

The cost of upgrading the B2046 to a suitable standard would, again, be enormous and, again, this is not a CCC budget. Upgrading of the B2046 between Wingham and the A2. This needs to start now. This should include a solution to how the B2046 connects with the A257 Sandwich-Canterbury Rd and, at the other end, how the already significant congestion at the B2046/A2 junction can be solved.

### Danger to road users on B2046

See details of the serious road accidents: <https://www.crashmap.co.uk/#crashmappro>

### The A260 - another inadequate and dangerous road that must be upgraded first

The A260 (A2 Barham junction to Folkestone) is seriously capacity-deficient and unsafe road, built for a relatively car-less age, that would be gridlocked by commuter traffic issuing from Adisham New Town (and Womenswold's 'Aylesham South').

Even before R1 (and R20) could be built, the A260 would be grid-locked by traffic from as yet unbuilt developments like Mountfield New Town, in Aylesham, and others in the Canterbury, Dover and Shepway districts. The A260 requires rebuilding along most of its length. Like the B2046, it is already the cause of fatalities and life-changing injuries. Please visit <https://www.crashmap.co.uk/#crashmappro>

R1 Adisham New Town should be taken out of the draft 2045 Canterbury Plan for road infrastructural reasons, apart from anything else. The impact of traffic issuing from Mountfield New Town when it is eventually built, (and from other new developments in the southern half of Canterbury district and the new developments in Aylesham and the northern half of the Dover District) must first be assessed against the capacity of a re-built B2046, (including re-engineered junctions at Wingham end, at the A2/A260 & B2046 junction) and a re-built A260.

### Existing traffic between the B2046, through Adisham, Downs Rd through Bekesbourne, even before R1 Adisham New Town

This is already a dangerous road, as CCC hopefully knows. As Adisham PC, we think traffic calming and safety measures should be installed on this road as it passes through Adisham now, much as Littlebourne has. These should start on the south side of the railway bridge and only stop after Adisham Court and the Old Rectory. Such measures should not be

attached to approval for R22. Many of the vehicles careering along this route appear not to be driven by residents of this parish.

Existing traffic through The Street (i.e. the road through our village) and Woodlands Road (between Adisham and the Bridge/A2 junction)

The speed of traffic along Adisham's The Street is intimidating to pedestrians. Also, Woodlands Road has seen a marked increase in the quantity and speed of cars, vans and lorries, which is a pity as it is a route favoured by walkers, horse-riders and cyclists. Special measures should be put in place now regardless of the fate of R1.

\* The whole length of The Street should be covered with a **20mph limit**. This will increase safety in The Street (particularly as many children attending Adisham Primary School walk to school along The Street).

\* Designate the whole length of Woodlands Road as a '**Quiet Lane**'. Under the Transport Act 2000, local authorities are able to designate roads for which they are responsible as '*Quiet Lanes*'.

\* The through-road (Station Rd - Downs Rd) needs **traffic calming measures**.

Woodlands Road and The Street are an integral part of life here but the increased volume and speed of traffic can make them uninviting and intimidating. A **20mph speed limit**, '**Quiet Lanes**' designation and **traffic-calming road engineering** would provide a chance for people to walk, cycle and ride in a safer environment, thus widening transport choice (a commendable aim of the draft Canterbury Plan).

**Please see Appendix A: Adisham New Town - Further vehicular, rail and public transport considerations (pages 25 - 26)**

- **R1 will cause drainage & flooding problems both in the village of Adisham and within the areas that will be built on above the village (Appendix C, Adisham Flood Map, page 45). It will cause sewage pollution elsewhere in East Kent unless enhanced or new sewage treatment and disposal facilities are built beforehand.**

In the context of the 3,620+ new housing units in the Adisham New Town scheme and the huge estate proposed for Womenswold, the preparation in the draft 2045 Canterbury Plan for sewage treatment & disposal is inadequate.

Sewage pollution of the Kent coast is a national scandal, as is the eutrophication downstream of our wetlands, such as famous Stodmarsh. New infrastructure is needed now to cope with approved but as yet unbuilt developments such as Mountfield New Town. In these circumstances, it would clearly be reckless to keep R1 and R20 in the draft plan.

Adisham already experiences pools of raw sewage emerging onto the surface in certain conditions.

See attached map (see illustrations): we are concerned that the prominent position of R1 Adisham New Town, at the top of the slope, would exacerbate existing flooding in the village and sewage emerging up through drains in The Street.

Plan Policy DS20 (Flood Risk & Sustainable Drainage), which CARE supports in general, would almost certainly be failed by R1 unless the surface and groundwater systems were built, following the appropriate site-specific assessments tests, before R1 housebuilding started. Failure to follow the principle of 'infrastructure first' would also lead to plan policies DM14 (Flood risk) and DM15 (sustainable drainage), both of which CARE supports in general, being failed as well.

CARE generally supports plan policy DM15, with sections (h) and (i) being particularly important. However, R1 would sit on an important aquifer. See below for more on groundwater contamination.

Plan policy DM16 (Water pollution): CARE supports DM16 but risk assessments of the impact of R1 on surface and groundwater systems are needed now (before the regulation 19 draft), not after R1 has entered the plan.

A detailed drainage strategy needs to be in place now, before any new town is considered and a definite funding commitment secured from the utility company. Building the proposed 3,620 housing units of R1 and R20 will add massively to this problem unless an effective drainage strategy is in place. The implementation of the drainage strategy must be funded and realistically phased before Adisham New Town can be part of a future Canterbury Plan. Realistically, just for the lack of an adequate drainage strategy, it seems to CARE that policy R1 should not be part of the 2045 Plan.

We are far from being reassured by CCC's document '*Potential onsite wastewater treatment works*'. We are astonished that CCC considers as acceptable, the carrying-away by multiple tankers daily, of the sewage output from new developments, for years to come until new sewage facilities are built, if they ever are. Clearly, this would be unacceptable if the Adisham New Town stayed in the plan.

- **R1 risks a water resources disaster in East Kent**

East Kent is already a water-stressed area. We understand that CCC have no scientific evidence to show that local water resources can bear the extra burden of 3,200 houses in R1 Adisham New Town.

When draft plan mentions '*rainwater harvesting*' and '*measures to separate storm water and waste water*', we understand that water butts are being referenced. Whilst we fully support the notion of widespread implementation of water butts as a means of reducing rainwater run off

among other benefits, it is frankly an extremely minor reduction to the impact that these new housing developments will cause.

A new reservoir is again proposed at Broad Oak (R26). We are sceptical that this can solve East Kent's water shortage and that it can reasonably allay fears that R1 would stretch local water resources to breaking point. In terms of it providing water economically and sustainably, the new reservoir proposal looks no different to the version that was turned down at the 1979 public inquiry. However, we note that the reservoir scheme is now being marketed to the public as a 'wonderful' leisure resource, a tactic which suggests much about the reservoir's actual feasibility. (Marketing the proposed reservoir in this way would, if the reservoir was ever built, lead to an increase in out-of-district car traffic.)

One of the key reasons for the Inspector's decision back then to refuse the reservoir application was that the River Stour would be turned into a ditch for much of the year (because its water would be required to top up the reservoir). Nothing appears to have changed in this respect. Clearly, this would be a disaster for the area's tourist and visitor industry, the Stour's river valley environment and for angling, to say nothing of the City's residents. There would also be a huge loss of farmland. Again, it is not CCC's budget and neither can CCC assume that the reservoir will be approved.

**Potential aquifer poisoning:** An important bore-hole is situated in the Parish of Adisham. We understand that this supplies Thanet and elsewhere. The aquifer, tapped by the bore-hole, includes the chalk under the R1 Adisham New Town. 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/sub-soil and water company staff were active around the release area for a long time. If the contaminant had filtered down to the aquifer, we understand that Thanet and elsewhere would be on bottled water until a new, uncontaminated water source could be tapped and new pipes laid.

If Adisham New Town was to go ahead, the risk of a major aquifer contamination must surely be high with the housing and whatever commercial/industrial enterprises that CCC imagines will set up at R1 on top of the aquifer.

- **R1 would largely sterilise the archaeological evidence**

The area under consideration for the R1 Adisham New Town scheme shows the extensive influence of people occupying the surrounding landscape for at least the last 4,500 years. As evidenced by the known remains of agriculture (field boundaries, enclosures etc.), habitation (settlement, farmsteads etc.) and funerary sites (graves, cemeteries, and tumuli etc.) as can be seen through traditional aerial photographs and more recently by Laser Imaging, Detection and Ranging (LIDAR). These techniques show a complex sequence of occupational land use differing from the focused settlements of villages and hamlets of the last two millennia. Largely ploughed level by later farming activities, their remains still survive as negative (below ground) cut features extending below the level of modern farming practices, and positive (earthworks, existing field boundaries), surviving and incorporated in the surrounding landscape. Varying in size and depths from post/stake holes through to extensive linear ditched enclosures, this historic landscape will also possess the remains of these early residents. Indeed, it is already known that during the expansion of Aylesham in recent years, archaeological remains of local/national importance were encountered, many of these being undetectable through the detection methods mentioned above and thus were only encountered through archaeological prospecting in advance of any construction, or discovery during constructional groundworks, their encountering causing costly delays. As such, we believe the R1 Adisham New Town would fail plan policy S8 of DS26 (Historic environment & archaeology).

Please see the map with historical information (see illustrations) including the locations of the mysterious 'dene holes' (those that are known, so far).

- **R1 Adisham New Town – mine workings, geological anomalies and sink holes**

As part of its homework on R1 Adisham New Town scheme, did CCC obtain a mining report from the Coal Authority? All known mining information, including the area's subsidence insurance claims history and underwriters' risk assessment of the R1 area, must be published now.

In the late 1970s/early 1980s, some houses in Adisham's The Street were visited by representatives of the National Coal Board to check for subsidence caused by the coal mines. The coal seams extend beneath Adisham, as evidenced by initial borehole in the late nineteenth century near Adisham Court, and the surrounding landscape to the north, south and east.

Sealing the underlying coal seams is an extensive deposit of soft, white, porous, sedimentary rock, known to all as 'Chalk'! Consisting of a subordinate carbonate mineral calcite limestone, it identifies the immediate geology of East Kent, and the North Downs. Formed by the compression of microscopic plankton settling on a sea floor of a warm tropical sea, its erosion since the last glaciation of the Ice Age (c.7,000 – 10,000 BPE) through natural processes defines the landscape and topography of the surrounding area. This forms vertical cracks and fissures to enlarge, subsequently infilled with later periglacial deposits, forming roughly circular funnel shapes of sizes ranging between 1 – 2m and up to 20m in diameter, but known to extend through the entire depth of the chalk. These create erratic anomalies to form in their depressed head openings, such as natural ponds, their unstable infilling deposits have been known to form sinkholes, many of which have caused constructional problems across Kent in the past. Several of these have been identified across the surrounding countryside.

- **R1 – impact on air quality**

We are fully aware that a major reason why development companies prefer green-field sites is that air pollution from a new settlement in open countryside can rise two or three times and still not breach the maximum pollution level permitted. This is because the existing or starting pollution levels on open countryside sites such as R1 on *Adisham Arable Downland* are low. In other words, building on a green-field site disguises the fact that pollution levels have doubled or tripled.

We are particularly concerned about fine particulate pollution, considered to be the air pollutant of greatest harm to human health, from electric cars and other vehicles. Obviously, particulate matter (PM) is able to travel deeply into the respiratory tract, the lungs and the rest of the body causing and exacerbating all sort of conditions.



How can you assure the residents of the Parish of Adisham, using science and logical argument rather than assertion, that if R1 goes ahead, you absolutely guarantee that particulate matter (PM) will both meet current air quality standards and that PM pollution will be below the legal limit set for 2040 (i.e. within the life of this draft plan) by the Environment Act 2021?

We are gravely concerned that a significant deterioration in air quality is inevitable, if the new town is built. The pollutants will come from traffic from the new town's 3,200 new houses moving by car within the new town, driving via 'rat runs' through Adisham and, understandably, using the B2046. There are Adisham residents whose families moved here for clean air for better health.

Bluntly, looking at new settlements of this scale elsewhere in England, concluding that there will be no adverse respiratory impact on people living in Adisham by air pollution from the new town is unrealistic. The health of some people in Adisham will suffer unless policy R1 is dropped from the plan. If R1 is still in the plan at the Reg 19 consultation, research should be provided on the likely impact on health by air pollution arising from Adisham New Town.

In conclusion, we are sceptical that plan policy DS16 (Air Quality), which CARE supports, can be met. An Emissions Mitigation Assessment needs to be conducted now to prove that R1 Adisham New Town will be 'air quality neutral' and will not lead to a net increase in emissions. Section 4 of DS16 states: *'Development which has an unacceptable impact on air quality, including sensitive receptors, will be refused'*. Adisham will hold CCC to this commitment in its DS16 policy.

- **R1 – impact on tranquillity/noise pollution**

Amazingly, despite the busy-ness of East Kent, an area of tranquillity (ref CPRE Tranquillity Maps) still encompasses the Parish of Adisham. That sense of tranquillity is an important reason why so many of us in Adisham have either moved to the parish or stayed here. It cannot be disputed that, at best, that stress-reducing sense of peace and calm will be diminished or lost if R1 Adisham New Town is built.

We support policy DM17 (Noise pollution & tranquillity), but sections 3 & 4 are hollow commitments in the context of the new town scheme. S5 of DM 17 is relevant: 'Where any significant noise pollution cannot be adequately mitigated, a proposal will be refused'.

- **R1 – impact on 'Dark Skies'/light pollution**

One of the great things about living in Adisham is that, on a dark and clear night, you can see the Milky Way while walking down The Street. CPRE's '*Night Blight – Reclaiming Our Dark Skies*' maps show that, despite everything, we in Adisham live in a place generally of dark skies at night. Based on the light emission from neighbouring Aylesham, to say nothing of the egregious light emission of Highland Court, R1 would spoil Adisham's dark skies at night, eroding our quality of life.

\*DM18 (Light pollution & dark skies), which CARE supports, again rings hollow. R1 Adisham New Town and S1 of DM18 are incompatible. How can S2(d), (f) & (g) possibly be met?

\*S3 of DM18 reads '*proposals for external lighting within areas of dark skies will only be permitted in exceptional circumstances*'. So, on yet another ground, R1 must fall.

- **R1 Adisham New Town – impact on habitat and wildlife**

Please see Appendix B, a substantive document with two parts, each prepared by an expert ecologist and official biological recorder. See also the Annex to Appendix B.

A biodiversity net gain of 20% can never compensate for the three huge losses described in pages 4-10 above. However, the garden ponds along the length of Cooting Lane (and indeed those in Aylesham and along The Street Adisham) will possess most, if not all, of the invertebrate population (which are mobile) that a water feature in R1 might contain. Unless completely artificial devices like introducing fish into a water feature, or planting tree species not found wild in the North Downs, is envisaged, it is likely that R1 will fail plan policy DS21. Expert evidence will be given on this point at the EIP.

In addition, vertebrate species abound of the edges of the land that would be destroyed by the new town, as well as on the site itself. These include badgers, foxes, bat species, slow-worms, grass snakes, frogs, newts and the Common Lizard. Toads are found around Pond Green. A White Stork from the White Stork Project visited Cooting Farm recently. In 2022, at least one raven has been observed on several occasions flying over the R1-targetted land. Lapwings used to over-winter on the 'R1-targetted land', between Bloodden/ Cooting Lane and the B2046, until the 1980s. As the national programme to rebuild lapwing populations gathers momentum, we hope that this beautiful species will once again over-winter in these fields.

## **R20 – the so-called Aylesham South estate proposed in the draft 2045 Canterbury Local Plan for the parish of Womenswold**

### **CARE 'strongly disagrees' with R20 'Aylesham South' (Womenswold)**

Even if R1 (Adisham New Town) had not been proposed, CARE would have opposed the R20 policy. It suffers many of the negatives that go with the new town. In sheer landscape terms, the scale of the proposed estate can be understood from the B2046 (in the direction of Wingham), looking to the right of Aylesham Wood and to the left of Well, Willow and Ackholt Woods.

It will cause problems for Adisham and all our neighbours, including significant road congestion and result in much environmental damage of one sort or another. We will leave our neighbours in Womenswold (and Aylesham) to elaborate on these but, like the proposed new town, it appears to be driven by the old housing targets policy.

If the numbers game is still important within CCC, we ask you to review the number of extant planning permissions granted in the district that have not yet been taken up. We understand that you have calculated and built in (to this draft of the plan) extant planning permissions that may be acted upon in the Canterbury district in the next five years. However, it seems that CCC have granted permissions for hundreds of units where CCC envisaged delivery after five years. If our understanding is correct, we suggest that these permissions (i.e. those with more than five years anticipated delivery) would more than wipe out the need for policy R20.

## **R22 - CARE 'disagrees' with R22 (@Station Road)**

Clearly, policy R20 is a very small issue for Adisham compared with policies R1 and R20. We also applaud CCC for recognising that Adisham has largely escaped housing back-fill. Nevertheless, R22 would increase road risk at an already dangerous point. The Downs Road through Adisham (between B2046 and Bekesbourne) urgently requires safety and traffic calming measures, whether or not R22 - or the SLAA Bossington Road proposal (SLAA142) for which there was support in Adisham - is favoured.

It would help us if you could explain why CCC did not support Adisham's solution of an extension, as far as Pond Green, of the existing housing association properties on Bossington Road. These would seem to better meet an existing and future housing need than R22, fit in better and would appear to cause less risk to road-users.

So, in conclusion on R1, three points:

**1<sup>st</sup>, Adisham New Town (R1) - not sound**

In proposing the so-called '*Cooting Farm Community Garden Scheme*', CCC disregarded the results of public consultation. Opinion in the Parish of Adisham is, and has always been, strongly and uniformly against the development of this land. It is strongly opposed by our neighbours including Aylesham, Wingham, Bekesbourne, Littlebourne and Womenswold.

Many people in the parish were not aware of the earlier consultation. The questions in Chapter 5 of the current regulation 18 consultation do not encourage public involvement. For example, asking people what change they would like to make to R1 is challenging; the question does not make it easy to say 'rub R1 out entirely'! The follow-up questions asking for 'evidence' are inappropriate; what 'evidence' can the lay-person submit when CCC's proposal poses an existential threat to that person's beloved village and community?

Obviously, like most other people including elected members of CCC, we only learned of this proposal in late October. However, our community will study the consultations, past and present (the latter which many people found difficult to access), and the conclusions drawn from them. We will submit these to the Examination in Public (EiP). However, our preliminary thoughts:

The results of the initial options consultation

No option had a majority support. CCC, at the stage of this consultation, felt it had to plan for at least the minimum number of new homes set by the government (perhaps an understandable option although, even then, accepting the national figures was not mandatory on local authorities). Obviously, that fundamental assumption (about the perceived need to accept the housing target handed down from central government) has changed with the letter dated 05/12/2022 from the Secretary of State to local authorities. The consequential amendments to the LUR bill going through Parliament, as well as the revisions being made to the NPPF, marks a sea-change in housing policy which CCC should embrace wholeheartedly.

Summary of initial consultation options:

Canterbury Focus A (9,000 homes) is favoured more than the other options, followed by Coastal Focus and New Freestanding Settlement:

- Canterbury Focus A: 27.5% agree and 32.9% disagree
- Preferred option: 10.3% agree and 66.8% disagree
- Canterbury Focus B: 8.6% agree and 65.8% disagree
- Coastal focus: 21.8% agree and 29.4% disagree
- Rural focus: 12.9% agree and 48.0% disagree
- New freestanding settlement: 19.4% agree and 34.2% disagree

**\*The above cannot reasonably be interpreted as supporting a new rural settlement in Adisham.**

**\*Furthermore, the initial options paper did not mention Adisham.**

**\*The apparent subterfuge in hiding C21 in chapter 2 (focusing on the City itself) rather than and placing it being open in chapter five (rural areas) led to many people not spotting this policy and missing the chance to comment on it.**

**Legal duty to co-operate – CARE believes this has been failed by CCC**

CCC's failure to collaborate with Dover DC, on the damaging impact that both R1 and R20 would have on the Dover district, will also feature at the EIP.

**2<sup>nd</sup>, Adisham New Town (R1) – not deliverable**

As CCC now knows, the Hawarden family have told developer representatives, the Council, the Parish Council and the media that they (including the next generation, all aged in their twenties) will continue to farm the Hawarden trust land (as they have done for several generations) and are keen to continue to farm the land that they are tenants of. A member of the family has used the phrase, 'over my dead body' to describe their family's abhorrence of R1.

CCC's earlier survey (2015) concluded that Cooting Farm as a standalone was not suitable for development.

Another reason for R1 not being deliverable is, as mentioned above, that it relies both on key non-CCC projects taking place and on budgets which are not under CCC's control.

In addition, much reliance is placed on developers to deliver infrastructure and services such as schools. Sadly, experience reveals the inability of local authorities to hold developers even to 'affordable housing provision' (although 'affordable housing' is, of course, increasingly being questioned as to whether it is a useful concept). The fact that the developers might have to spend in the region of £100million just to buy the land (if all the required farmland was available for purchase) means that the developers will have relatively little to spend on infrastructure and things like schools would be delivered barely meeting quality requirements, if at all.

At current household formation levels, over 10,000 people would live in R1 and R20. There are many unanswered questions about where these people will come from (i.e. this allocation will not be meeting a community need identified in the Canterbury District or in Kent). As we have seen with other major developments, the people will come from all over the UK. Where will the adults work? And so on!

### **3<sup>rd</sup>, Adisham New Town (R1) – not sustainable**

In the response above, we (Adisham PC) have described several sustainability problems that could or would occur if the new town was ever built. Policy R1 is simply unsustainable. Furthermore, R1 (and R20) are now redundant in their prime purpose; they were conceived under the old, redundant housing policy.



## **C21 'Land at Canterbury Business Park' – CARE 'strongly disagrees'**

Page 3 of the Plan states that Chapter 2 'sets out the strategic policy framework for development in the urban area of Canterbury'. But plan scheme C21 (pages 70-72) is clearly intended for open countryside, on the edge of the Parish of Adisham. There can no justification for this apparent sleight of hand. C21 is clearly located in the open countryside, unlinked to any village and miles from the built-up area of the city. It is rural, not urban! What appears to be an attempt to 'make smoke', obscuring the true intentions of the draft plan's architects, is another failure of the process of consultation, which in CARE's view, makes the draft Canterbury Local Plan 'legally unsound'.

What appears to be a democratic deficit within CCC's plan-making is emphasised by the exhaustive public debate of the pros and the cons of the recent application to expand the Highland Court site massively. After that thorough public scrutiny of the expansion proposed then by the developer/applicant, CCC's own planning committee overwhelmingly voted to reject the scheme. It is unfortunate that the impression is given that the draft plan's architects have decided to try to slip through a modified version of scheme, showing a disregard to the expressed views of the public and making a mockery of public involvement in the planning process and the hard work done by local communities resisting the-then scheme.

Even though the 'holiday village' and the sports grounds do not appear to feature in C21, C21 takes development outside the Designated Employment Area. CARE strongly objects to the siting of C21 on grounds of landscape, tranquillity, transport, light pollution, permanent loss of prime farmland and leisure & amenity:

- (i) C21 would represent a major development in the nationally designated Kent Downs AONB and on one side of our very rural parish. The proposal would essentially transform the views, the feel, tranquillity and amenity and leisure experience on the very edge of the Parish of Adisham and it will hurt the AONB itself, from beautiful countryside to a large industrial development.

- (ii) The existing site is already an egregious emitter of light pollution and CARE disbelieves assurances that C21 will not add to light pollution. The plan should, instead, make a priority of reducing light pollution from the existing site.
- (iii) As was demonstrated when the last attempt was made to expand this site, the local roads cannot accommodate such an expansion. At a packed public meeting in Adisham Village Hall, the applicant-developer of the unsuccessful scheme was unable to explain why his scheme would not flood the local roads. There is no easy access to public transport. Nothing has changed: Adisham, Bekesbourne, Patribourne and Bramling would suffer from a huge increase in through traffic. Coldharbour Lane, Woodlands Road (i.e. for cyclists, Sustrans National Cycle Network regional route 16), The Street Adisham, Bramling Road, Shepherds Close Road and Adisham Downs Road would all be congested. There is nothing that can stop this, except to strike C21 out of the plan. Further pressure would also be placed on the B2046 and A257. It is a delusion to think that all traffic to and from C21 would use the A2.

Government policy on AONBs has been strengthened, with re-iterated direction to local authorities (NPPF para 176) for AONBs to be enhanced, as well as conserved, under the Countryside and Rights of Way Act 2000). A new sentence has also been introduced into the NPPF which requires that the scale and extent of development within AONBs must be limited, which clearly demonstrates central Government's commitment to avoiding any sizable development within AONBs and the 'setting of AONBs'.

## **Next steps**

**C21** - 'Land at Canterbury Business Park' – **remove from the plan entirely.**

**R1** – Adisham New Town - **remove from the plan entirely.**

**R20** – Womenswold Estate - **remove from the plan entirely.**

**R21** – Local Services Centre – **remove the proposed Adisham Local Services Centre from the plan entirely.**

**(R22 – Consider substituting** the 10 houses proposed along the Station Road [one-house deep, in line with Adisham's existing historic pattern of development] for more housing association units on Bossington Rd, continuing the line already there, as far as Pond Green.

**R28** – 'Countryside' – **include** Adisham under this policy within the plan.

**Embed** the Grampian Principle throughout the plan.

**CCC Trees/Woodland Strategy** – **implement** (see Appendix D)

## **Further provisions:**

- Safety measures and traffic calming measures on the road between the B2046 and Bekesbourne, particularly through the village;
- Impose a 20mph speed limit for the whole length of The Street;
- Designate the whole length of Woodlands Road as a 'Quiet Lane', from where Woodland Road leaves The Street to the A2 underpass/Bridge junction.

- When Adisham has carried out a Neighbourhood Plan (this will start when the existential threat posed to our community by the new town idea has been removed), we ask CCC to support our proposals for appropriate and targeted new development to take Adisham through to its 1,500<sup>th</sup> anniversary (2123CE).

10/02/2023

## **Appendix A: Adisham New Town - further vehicular, rail and public transport considerations**

### **(i) VEHICULAR CONSIDERATIONS**

The City Council's Local Plan (Draft Infrastructure Delivery Plan) is light on vehicular issues and is based on 2019 transport studies. Volumes of traffic stated do not take account of the 1,000+ homes built in Aylesham between then and now. Nor is the impact that this has had on local traffic volumes accessing the A257 at Wingham from the B2046 or the A2 at the Barham interchange, both of these interchanges experience traffic queues each day Monday to Friday, been studied since the new development.

No provision has been stated within the new Infrastructure Delivery Plan as to how an additional 3,000 plus cars are going to access; 1) the B2046 and 2) the junctions at Wingham and the A2 at peak times without excessive queuing times at each of these junctions.

**Within the Local Plan and Infrastructure Delivery Plan, no Traffic Management Plan has been produced to deal with such an increase in traffic volumes trying to access existing A-roads nor additional safety measures along the B2046, which has already experienced fatalities within existing traffic volumes.**

No mention is made within the Infrastructure Delivery Plan as to how the existing single Lane system of roads linking local villages would be enhanced to deal with the substantial increase in traffic from the proposed developments.

**This is an over-sight within the Local Plan and the Infrastructure Delivery Plan**

The Infrastructure Delivery Plan also states that there will be no benefit in reduced emissions due to residents cycling rather than driving, nor from the use of Public Transport, which is currently non-existent within the area of the proposed Cooting Farm development.

**If there is to be no benefit in reducing carbon emissions from this proposed development, why is it being proposed in this position which will see the destruction of many acres of quality farming land?**

### **(ii) RAIL CONSIDERATIONS**

The Draft Infrastructure Delivery Plan at 10.20 states that the City Council will work with Network Rail and Southeastern to develop proposals for upgrading Adisham Station including a southern access to the station, step free access between platforms and a cycle hub. Other recent upgrades to Southeastern Stations (Swanley, Sevenoaks and Maidstone) have been jointly funded between the Railway Company, Kent County Council and the relevant Local Authority. In this proposal, no mention is made within the Plan of how improvements to Adisham Station would be funded.

**Within the Draft Infrastructure Delivery Plan, no funding source is mentioned at table 8.1 for the development of Adisham Station**

When asked South-Eastern stated that any long term plans for increased services would be based on changes to passenger numbers and travelling patterns on the Dover to Victoria route.

**(iii) PUBLIC TRANSPORT CONSIDERATIONS**

Within the Draft Infrastructure Delivery Plan (2022) no mention is made of public transport provision to and from the proposed new development. Currently there is no bus service to and from Adisham Village provided, other than a daily school bus to and from Canterbury, which is over subscribed.

This lack of consideration for bus services to the proposed new town in Adisham ('Cooting Farm Community Garden Scheme) and the current village is shown by the lack of carbon reduction mentioned by the building of this development.

It is assumed that no bus service would be forthcoming unless there was a demand.

This week the Levelling-up Secretary stated (Centre for Policy Studies Conference):

***"... that planning reforms would see the creation of beautiful homes, accompanied by infrastructure and environmental enhancement, with environmental concerns being taken seriously, and democratic decision making taking in the wishes of local communities."***

## **Appendix B** (two parts):

### Part one: Impact of the proposed R1 development on the Kent Chalk Downland landscape

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

## Part two: Impact of the proposed R1 development on the Ileden and Oxenden Woods SSSI and adjacent land

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

**Annex to Appendix B: Kent Ornithological Society records for south Adisham (i.e. for the land that would be destroyed by R1 Adisham New Town and neighbouring land that would be detrimentally impacted by increased disturbance of all sorts and by increased footfall in the most sensitive habitats.**

<b>Species</b>	<b>Site</b>	<b>Date(s)</b>	<b>Count</b>
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
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 600)
Swallow	Barham Downs (TR2151)	07.08.2014	6
House Martin	Adisham (near Aylesham) (TR2253)	22.09.1992	100 (SW 100)
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
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
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
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

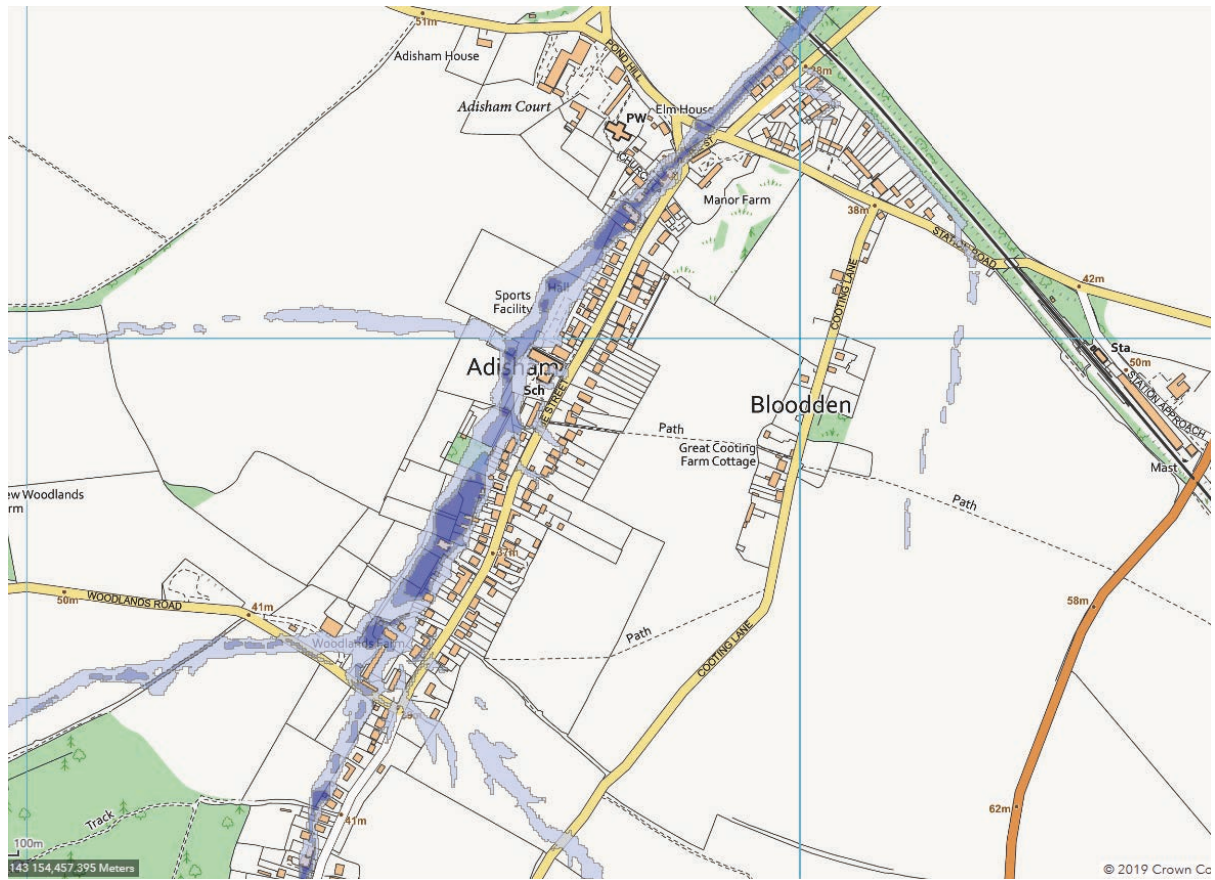
Goldfinch	Adisham (near Aylesham) (TR2253)	17.06.2018	4
Goldfinch	Adisham (near Aylesham) (TR2253)	20.06.2018	2
Siskin	Woodlands Wood (Ileden) (TR2153)	24.11.2010	2
Linnet	Adisham (near Aylesham) (TR2253)	22.09.1992	220
Linnet	Adisham (near Aylesham) (TR2253)	31.12.2008	1
Linnet	Adisham (near Aylesham) (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 (TR2053)	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
Corn Bunting	Adisham (near Aylesham) (TR2253)	19.06.2018	2

[End of KOS data]

## Appendix C - Illustration: Flood Map for Adisham village and Bloodden hamlet



<https://webapps.kent.gov.uk/GIS/public/Floodmaps/>

## Appendix D – CCC's Trees/Woodland Strategy consultation

CARE supports the strategy as outlined in the policy document and endorses the response of WOAW (*Watch Over Adisham's Woods*) as follows:

### **2. The draft strategy sets out some key principles. To what extent do you agree or disagree these are the right principles?**

Protecting existing trees and woodlands

Expanding trees and woodlands in both rural and urban areas

Enabling nature recovery

Involving everyone in our vision for trees and woodlands

Why? Are there any other principles you think should be included?

There are some important additions and amendments that I feel need to be made to the 'protecting existing trees and woodlands' principle. There is mention throughout the draft strategy of ancient woodland being an 'irreplaceable habitat' and rightly so, due to the complex networks of fungi that develop in undisturbed soil through centuries of decaying plant matter. If CCC wants to be truly forward-thinking and ambitious in their woodland strategy, they should commit not only to no loss of ancient woodland whatsoever but a principle that no development will be approved in, adjacent to or near to ancient woodland. A study commissioned by the Woodland Trust in 2008 (see attachments to my response) highlights a wide range of damaging impacts that development at close proximity to ancient woodland can cause to these special habitats. Yet recent developments such as that in Cockerling Farm, Thanington, and proposed ones such as R1 in the CCC Draft Local Plan, are worrying given their scale in relation to the woodlands and their proximity to these ecosystems.

Furthermore, recognising how long biodiverse woodland habitats take to establish, CCC should move away from the language of 'net loss'. Planting more trees to replace an existing woodland should never be a justification for allowing development, as new trees/woodlands will never adequately replace an existing complex ecosystem.

I would recommend including 'integrated woodland management' into these principles. Part 2 of this draft strategy highlights the importance of good management and Part 3 the dangers of woodland lotting, which is leading to a rise in ownership of small parcels of larger woodlands without any overarching management strategy. I suggest one possible tactic later in my comments re: facilitating forums for local wood stakeholders.

I would also recommend including 'active monitoring' within these principles. In particular, surely CCC could play a role in ensuring that legally responsible bodies (such as Natural England for SSSIs) undertake inspections/operations within an appropriate timeframe. For example, Natural England are supposed to inspect SSSIs every 6 years, yet recent evidence across the UK suggests this is only achieved in half of SSSIs (some parts of Adisham's SSSI haven't be

inspected since 2008). As I suggest later in my comments, including representatives from these organisations in local forums with owners, community groups/ reps and policymakers could help here.

Lastly, under the 'involving everyone' principle, it would be good to see commitment to working alongside KCC to maintain safe and responsible PROW access and monitoring misuse of these PROWs; maintaining access while preventing damage to habitats.

## **Part 2: About Canterbury's Trees and Woodlands**

This section of the draft strategy gives details of:

- current tree canopy cover across the district
- ancient, veteran and noble trees
- the amount and location of woodland across the district
- access to woodland
- hedgerow areas

**3. Do you have any comments on this section of the draft strategy? Do you think any changes should be made and if so, what and why? Please write in below**

It would be helpful to see evidence here that CCC understands recent trends in woodland ownership, including the rise of woodland lotting companies buying large areas of woodland, splitting them up into small parcels and selling them on at much higher prices per acre. This growth in woodland lotting is fragmenting the management of woodlands that in many cases have been traditionally managed as a whole, which has consequences for management practices such as coppicing regimes and PROW maintenance. The concerning impacts of this trend in Kent were outlined in a 2007 report created with support and funding from the European Regional Development Fund, Kent Downs AONB, Forestry Commission, KCC and Natural England (find this report in the attachments to my comments).

As well as the proposal of planting trees to integrate currently fragmented woodlands, which is a sound strategy, CCC should consider what possibilities there are for restoring formerly wooded areas. As I mention later in my comments, areas such as Woolage Green saw large and extensive areas of woodland ravaged in previous decades/centuries by agriculturalists. In some cases, like Woolage Green, these areas are now low-grade farmland whose soil would likely still retain some important characteristics for successful woodland restoration.

I otherwise concur with everything set out in this section, which accurately describes the situation across the district with respect to woodland and trees.

## **Part 3: Trees and Woodlands for the Future**

This section of the draft strategy sets out:

- our ambitions for the future
- how we plan to protect existing trees and woodlands
- why we need to expand tree cover
- how trees can mitigate the effects of climate change
- how and where tree cover can be extended

**4. Do you have any comments on this section of the draft strategy? Do you think any changes should be made and if so, what and why? Please write in below**

In the 'Protecting Existing Trees' section, there is no mention of Article 4 Directions and their potential as a tool for protecting woodland, particularly from development. Given the rising trend in small woodland ownership, particularly for leisure purposes, Article 4 Directions are able to prevent damaging operations that would otherwise fall within the scope of 'permitted development'. There are examples around the country where these mechanisms have successfully protected woodland. I would urge CCC to strongly consider greater use of these powers in woodland contexts in the future, to prevent incidents such as the extensive construction of buildings and roadways seen recently in the ancient woodland in Adisham.

The mention of felling licences under Delivering Principle 1 should specifically highlight that no more than 5 cubic metres of timber should be felled per calendar quarter without a felling licence. It could also be mentioned that Defra and the Forestry Commission now have the power to impose unlimited fines on landowners who fell trees without a licence.

For Delivering Principle 2 on expanding woodland cover, the strategy could include a commitment to research previously wooded areas using historical material. The soil in many historically wooded areas will retain the qualities needed for healthy woodland establishment and will often link fragmented remnants of these former woods.

For Delivering Principle 4, I believe CCC can do more than simply providing information on species, natural regeneration and so on. There is an opportunity for CCC to take a leading role in bringing together responsible bodies (Natural England officers, Forestry Commission, Woodland Trust etc.), woodland owners, community groups and individuals such as Tree Wardens through hosting regular local woodland summits. These would allow sharing of up-to-date information between stakeholders (rather than general guidance), collective future planning, opportunities for integrated woodland management, greater oversight over operations by responsible bodies and greater community involvement in contributing to the future of local woods.

Overall, there are lots of positive ambitions and ideas here, however CCC should aim for more direct and specific strategies than just providing information.

**Part 4: Action Plan**

The action plan sets out what needs to be done to deliver the draft strategy, who will lead on each action and when we aim to deliver each action.

**5. Do you have any comments on the action plan? Are there any other actions you think should be included?**

Re: funding sources, CCC must ensure that these are responsible, so that the

council's actions are not justifying ecological damage elsewhere (within or outside the district). Mention of s106 and Biodiversity Net Gain is worrying, as these concepts have previously been used to support developments that are highly destructive to important established habitats. For example, these principles featured in the planning application for the proposed development at Betteshanger Country Park in Dover district, which contains exceptional and nationally-rare biodiversity. Protecting these existing important habitats needs to be the priority and CCC must ensure it does not conspire in events that would damage these. It should therefore assess funding sources responsibly, keeping the fallibility and abstracted nature of concepts like 'biodiversity net gain' in mind.

For similar reasons to the above, I believe that CCC should avoid the language and paradigm of 'net loss' when making strategic decisions in relation to woodland, given the significance of established woodland habitats for ecosystem health and biodiversity in comparison to newly-planted trees.

**6. Do you have any comments on any of the proposed areas for tree expansion as shown on the map on page 23 of the Tree Strategy?**

I believe a further strategic area for tree expansion could be identified in Woolage Green, in the far south-east of the district. If you look at historical maps from the late 19th and mid-20<sup>th</sup> centuries, you'll see a very large area of woodland ('Woolwich Wood') lying to the west of the settlement, which was formerly central to the identity of that parish and an important part of Woolage Green's character as a place. This all changed in the 1960s when it was felled to make way for agricultural land. The farmland currently there in its place is now classified as Grade 3. Given its proximity to existing woodland and the context of the land being woodland in the not-too-distant past, this may even be an appropriate site for natural regeneration. However, this will need to be assessed further and the local community consulted in advance.

**7. Do you have any other comments on the draft Tree and Woodland Strategy? If so, please write in below or alternatively you can upload up to three supporting documents if you would prefer**

CCC should not underestimate the impact that new developments would have on woodland health. It is an admirable goal to intend to build ecological connectivity and access to nature/open spaces into policies for future development. But particularly for large residential and commercial developments, the combination of big increases in local population/traffic through areas, significantly greater artificial light and noise and the spread of non-native species (via garden plants and pets) will regardless always pose arguably the most significant threat to the health of local woodland (see again the attached 2008 study by the Woodland Trust). This threat should be acknowledged.

Overall, I would urge CCC to ensure it takes a holistic approach to woodland that always incorporates the wider range of species that depend on trees and not just trees themselves, given these species' crucial importance for biodiversity, ecosystem sustainability and pollinator health. CCC must ensure it does not

abstract the other important components of these ecosystems out of the equation by focusing too much on measures such as carbon sequestration, canopy cover, biodiversity net gain and so on.

I would urge CCC to continue its positive and productive communication with local woodland and nature-focused community groups such as Watch Over Adisham's Woods. It is encouraging to see lots of mention of community groups, tree wardens and other volunteers throughout this draft strategy. I hope CCC will maintain and enhance these important lines of communication into the future. It is often community members who know their local woodlands best and their knowledge should be valued and incorporated into future strategies.

WOAW/JAL

-ENDS-

**Appendix E - The beauty of the countryside at the R1 site and its setting – a photographic record**



*Fig 1. View south to Cooting Downs, Aylesham Wood/Corner, from bridleway CB188 off Adisham Downs Road*



*Fig 2. Looking south towards Cooting Farm, from bridleway CB188 off Adisham Downs Road*



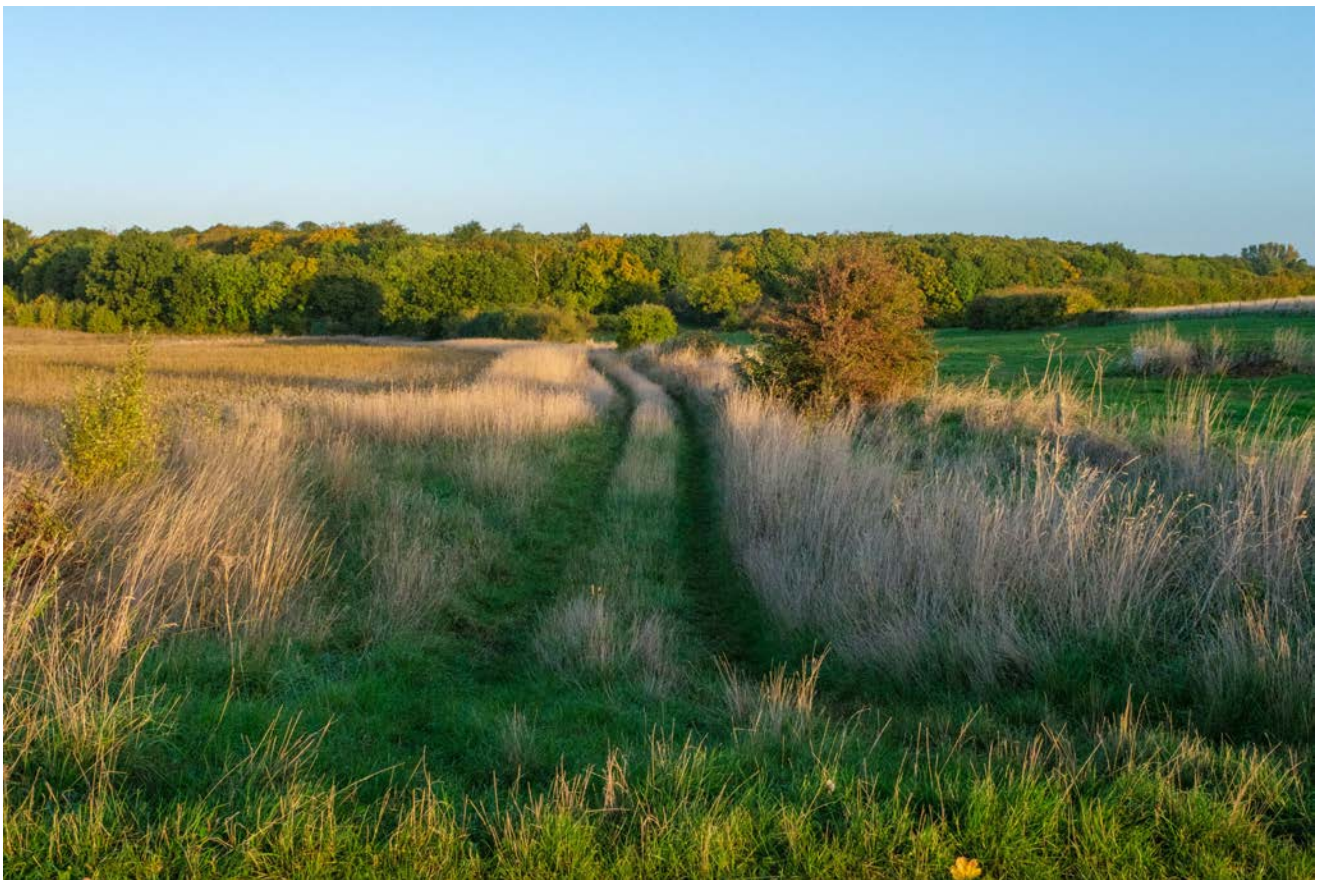


*Fig 3. Southerly view across Cooting Farm land to R1 boundary from bridleway CB194*



*Fig 4. View north across the fields between The Street, Adisham (left) and Cooting Farm (right)*





*Fig 5. view north-west towards Pitt Wood, where PROWs CB199A, CB200 and CB526 meet*

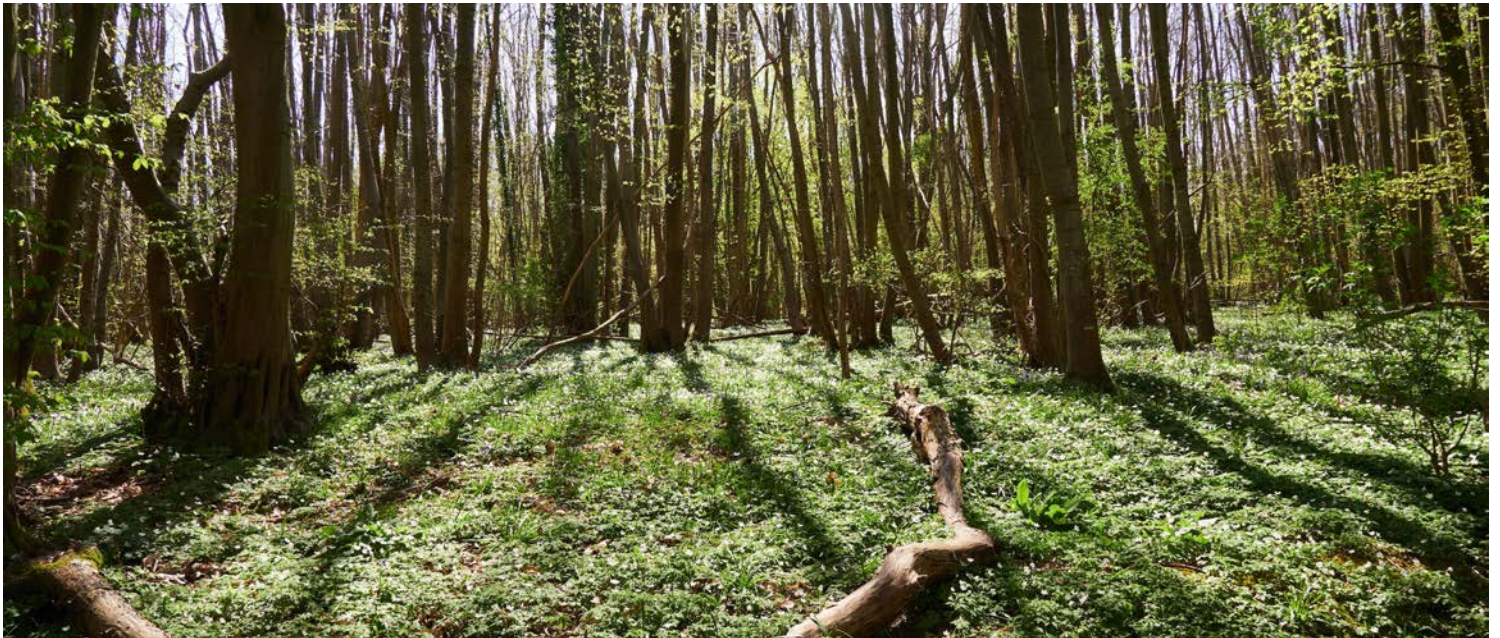


*Fig 6. Bridleways near Woodlands Wood - looking south along CB200 at the point CB199 begins  
Hedge on left horizon marks byway CB202 and the R1 southern site boundary*





*Fig 7. Fields at the southern edge of R1, Ileden / Well Wood in distance*



*Fig 8. The woods*





*Fig 9. Cooting Farm land at southern edge of site R1, Aylesham Corner to left, Ileden Wood to right*



*Fig 10. Looking south-east towards Cooting Farm fields with B2046 and Aylesham Wood in distance*





*Fig 11. View east over Cooting Farm farmland with B2046 and Aylesham beyond, (top of houses in The Street, Adisham visible in foreground)*



*Fig 12. Cooting Downs*





*Fig 13. Cattle close to Cooting Farm and bridleway CB194, view south-east towards Aylesham*



*Fig 14. Yellowhammer on Cooting Lane hedgerow (species red listed)*





*Fig 15. View from Aylesham looking east across Cooting Downs towards Woodlands and Pitt Wood*



*Fig 16. View north from southern R1 boundary, across Cooting Downs, Cooting Farm on right. The Street Adisham centre left, Adisham Court farm centre middle, Frith Wood and Bramling in far distance*





*Fig 17. South-east from bridleway CB200 near Cooting Farm, to Aylesham Wood & R1 south boundary*

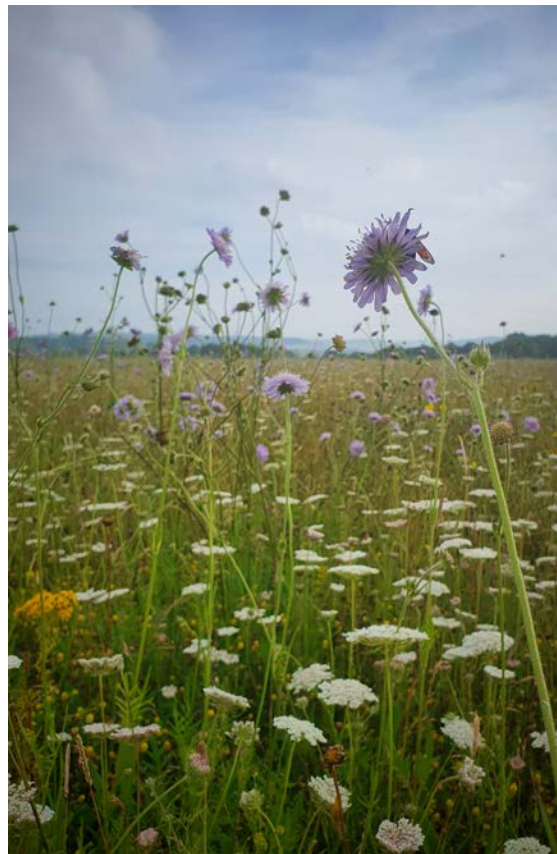


*Fig 18. View north from byway CB202 (R1 southern boundary)*





*Fig 19. View east from Aylesham to Cooting Farm/Little Cooting Farm (Pitt and Oxenden Woods on horizon)*



*Figs 20 & 21. Wildflowers on Cooting Farm land*





*Fig 22. South-east view from bridleway CB200 towards Aylesham Wood*



*Fig 23. View from SLAA262, at rear of houses on The Street, south in direction of Cooting Farm*





*Fig 24. Cooting Farm buildings as seen looking southeast from bridleway CB194*



*Fig 25. View of Bossington (north of Adisham) from footpath CB190 by railway line*





*Fig 26. Lapwing (red listed) feeding on farmland by southern R1 boundary*

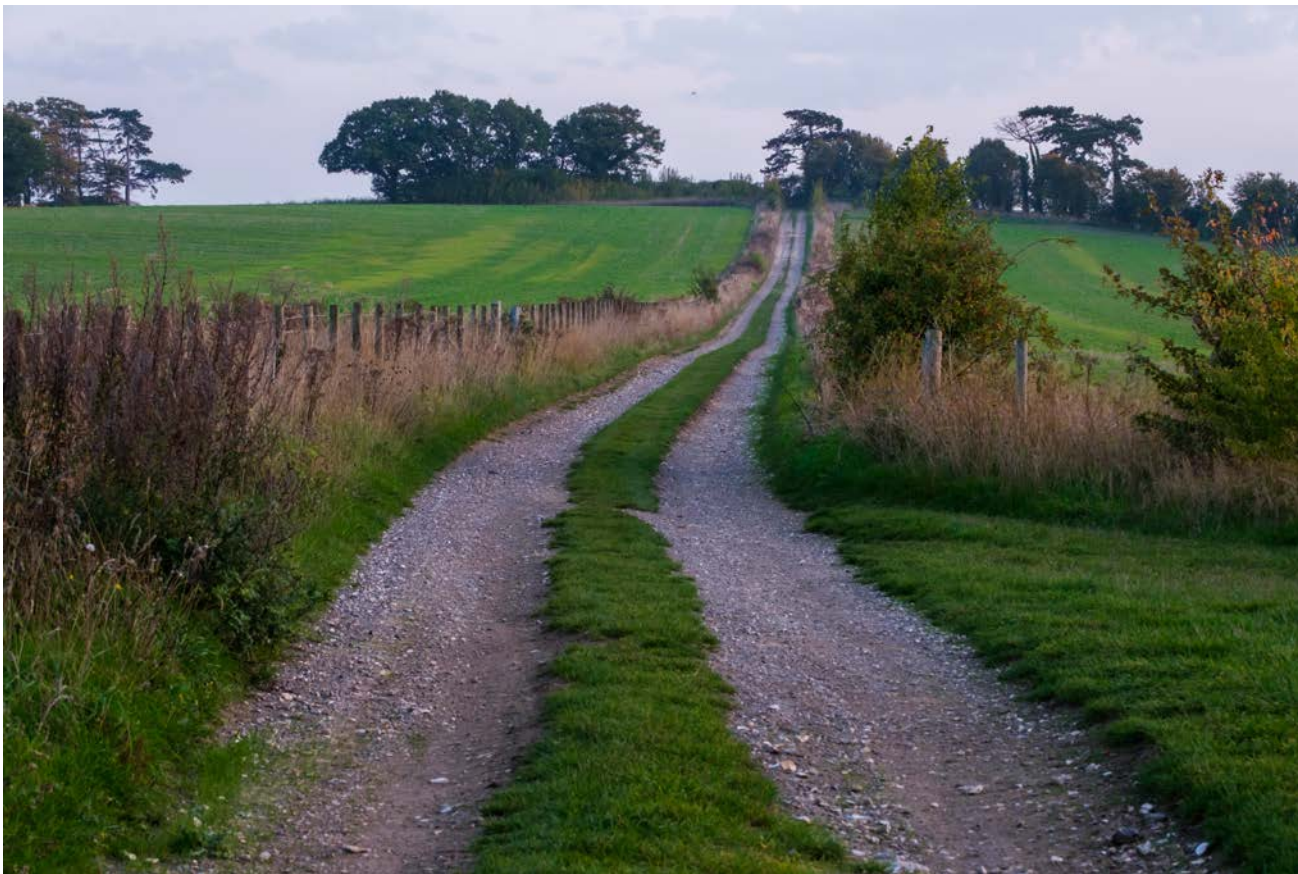


*Fig 27. Woods*





*Fig 28. View WNW from southern R1 site boundary towards Ileden / Well Woods (Bekesbourne in distance)*



*Fig 29. Byway CB202 on southern boundary of R1, looking SSE towards Aylesham Corner*





*Fig 30. Riding on bridleway CB194, eastwards towards Cooting Lane,  
(Woodlands Road and Twelve Acre Shaw on horizon)*



*Fig 31. Looking east across Cooting Farm land towards B2046 and Aylesham Wood*



*Fig 32. Looking east from Woodlands Road, Adisham, showing houses at southern end of The Street (Aylesham and B0246 on horizon)*





*Fig 33. Southwest view from bridleway CB194 towards houses at southern end of The Street, Adisham*



*Fig 34. Houses in Blooden (Cooting Lane) as seen from footpath CB192, crossing field within SLAA262*





*Fig 35. View south from Adisham railway station (footpath CB529) towards Cooting Farm*



*Fig 36. View east showing hedgerow by bridleway CB194 leading towards B2046/Aylesham*





*Fig 37. East from New Woodlands Farm, Adisham towards Cooting Farm buildings (B2046/Aylesham on horizon)*



*Fig 38. Looking south from house at upper end of Station Road, Adisham, across large field on SLAA262*





*Fig 39. Looking east towards Aylesham from houses in Blooden*



*Fig 40. View of disused barn (adjacent to site R22), SLAA262 beyond (the railway line and Adisham railway station is behind the trees upper left)*





*Fig 41. View north from Aylesham corner, southern R1 boundary, highest point of site Cooting Downs and railway line in distance, North Kent coast on horizon*



*Fig 42. View south across Cooting Downs to Aylesham Wood*



*Fig 43. Looking west across Cooting Farm land (horizon: Woodlands Road and farm left, Adisham Downs Road right)*



**Wildlife at Cooting Farm and surrounding area**



*Fig 44. Six-spot burnet moth*





*Fig 45. Long-eared owl*



*Fig 46. Greater Spotted Woodpecker*



*Fig 47. Red kite*



*Fig 48. Woodcock (red listed)*





*Fig 49. Long-tailed Tit*



*Fig 50. Pied Wagtail*





*Fig 51. Green woodpecker*



*Fig 52. Little Owl*



*(left) Fig 53. Green Veined White butterfly*

*(above) Fig 54. Comma butterfly*





*(left) Fig 55. Buzzard, (middle) Fig 56. Elephant Tiger Moth, (right) Fig 57. Grey Heron, (below) Fig 58. Pheasant*







*(left) Fig 59. Red-legged partridges - a breeding pair also observed with chicks*

*(lower left) Fig 60. Tawny Owl chicks*

*(lower right) Fig 61. Marbled white butterfly*





**Garden wildlife in The Street, Adisham**



*Fig 62. Hedgehog (2020 British Mammal red list)*



*Fig 63. Dunnock (juvenile)*





*Fig 64. Blue Tit*



*Fig 65. Great Tit*



*Fig 66. Blackbird (adult)*



*Fig 67. Blackbird (juvenile)*



*Fig 68. Collared doves*





*Fig 69. Robin (juvenile)*



*Fig 70. Starling (juvenile, red listed)*



*Fig 71. Chaffinch (female)*



*Fig 72. Chaffinch (male)*



*Fig 73. House sparrow*



***Photo credits***

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For more images see [adisham-countryside.com](http://adisham-countryside.com)



*Sunset at OS trig point, February 2023*