

13th January 2023
By email only: consultations@canterbury.gov.uk



Dear Madam/Sir,

RE: Regulation 18 Consultation on the Draft Canterbury District Local Plan to 2045

Kent Wildlife Trust (KWT) welcomes the opportunity to comment on the Draft Canterbury District Local Plan to 2045. We have reviewed the documents online and have provided comments and recommendations below. To allow us to complete a comprehensive response to your consultation, please accept our comments in letter format as opposed to submitted via your questionnaire.

Spatial strategy for the district

This section sets out Canterbury's key assets and challenges, and sets out "a positive vision for the future of [Canterbury] which responds to these challenges." At the end of 2022 Canterbury was recognised as one of the top 10 places that drove positive change in 2022; link [here](#). This recognition centres specifically around the introduction of Bison to West Blean and Thornden Woods as part of a pioneering project to boost biodiversity and tackle climate change. Given the immense opportunities for this project to drive biodiversity and climate benefits, tourism, education, community engagement and economic growth, KWT would be keen to work with you to embed the Wilder Blean project within the district's special strategy.

Vision for the district to 2045

KWT are supportive of the inclusion of some key aspects of the Vision, including improved ecological connectivity and the restoration and enhancement of habitats across the district. In addition, the inclusion of reference to an increased focus on using nature-based solutions to tackle the climate emergency is welcomed. There is however a key omission within the vision for the district, in that Canterbury's commitment to achieving net zero carbon emissions by 2030 is not represented.

Strategic objectives for the district

We recommend that specific reference to the inclusion of high-quality green and blue infrastructure be included within the strategic objectives for the District. An effective network of multi-functional green infrastructure is key to promoting active travel, creating accessible vibrant towns and tackling the nature and climate crisis.

A greater focus on increasing access to nature would benefit the strategic objectives. There are a multitude of health and wellbeing benefits of daily contact with nature. A recent [report](#) reveals that prescribing contact with nature for people who have low levels of mental wellbeing is excellent value for money for improving their health and wellbeing. The report, which is based on three years of research found that people participating in both sorts of outdoor nature conservation activities felt significantly better, both emotionally and physically, as a result. They needed, for example, fewer visits to GPs or felt more able to get back into work. We encourage the council to explore social prescribing of nature-based interventions. It may be of interest that social prescribing is being trailed in Derbyshire, where referrals will be made to social prescribing services. We believe that Canterbury is extremely well placed to adopt similar ambitions for their own resident's health and wellbeing.

The following objective; "*Protect and enhance our rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities*" should be amended to include direct reference to the creation of a coherent ecological network, in line with the Government's 25 Year Environment Plan and the Environment Act. Strategic planning of Local Nature Recovery Strategies will be fundamental to informing development and biodiversity net gain delivery and thus should underpin the vision and objectives for the district. By the time the Local Plan is adopted, Kent should have an established Local Nature Recovery Strategy. We urge the council to set out how it will have contributed to and intends to support the delivery of this vital network for nature.



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KWT do not feel that the final objective, which relates to climate change, is sufficiently ambitious to tackle the climate emergency. We urge the council to set an ambitious target for the entire district to achieve net zero, through ambitious carbon reduction targets, and the offsetting of residual carbon emissions through habitat creation within the district.

The intention of the map included on page 8 of the Draft Plan is not clear, although it is assumed that this has been produced in connection with the spatial strategy for the district. As detailed above emerging Local Nature Recovery Strategies, which have been mandated through the Environment Act, will form a key tool for strategic planning. Whilst it is acknowledged that these strategies are not yet complete, and further guidance from the government is being waited on, there are steps that the council can take to include reference to a Local Nature Recovery Strategy within the Draft Plan. The inclusion of Local Wildlife Sites and Biodiversity Opportunity Areas within this map, both of which will form part of the core of the network, should be included within spatial planning for the District.

The following comments have been made with reference to policies within the Draft Plan which fall within KWTs remit and expertise. We would welcome the opportunity to meet with Canterbury to discuss our comments, suggestions and concerns.

Policy SS1 – Environmental strategy for the district

Kent Wildlife Trust are in full support of Policy SS1, which includes reference to the delivery of 20% Biodiversity Net Gain (BNG) through developments across the district. Further comments on BNG are provided in response to Policy DS21.

The inclusion of a 20% tree cover policy for developments of 300 homes or more is a positive step, however we seek on how this target will interact with BNG requirements set out within the Plan. It is likely that, on some sites, woodland is not the best outcome from an ecological perspective. We are keen to ensure that the ambitious tree planting target is not at the detriment of other vital habitats, for example neutral and chalk grasslands. In these cases, we would encourage tree cover to be delivered within urban green infrastructure and street trees.

Further information on what paragraph 7 of Policy SS1 deems to be “suitable locations” for renewable power generation would be useful. Kent Wildlife Trust have seen an increasing number of renewable power schemes, proposed within sites of high ecological value, including Local Wildlife Sites. We urge the council to look at local energy schemes and the retrofitting of renewable energies to existing commercial and residential buildings. Such models would benefit both the environment and the local community. Retrofitting of renewable energy has the added benefit of reduced land take for renewables. There is potential that if local renewable energy supply took off that it could serve as an alternative to replacing larger schemes, with reduced impacts on biodiversity if solar panels are being retrofitted to buildings. Crude estimates indicate that the retrofitting of solar panels to 10% of schools nationwide would be equivalent in energy generation to a scheme the size of the Cleve Hill Solar Park. Where large scale renewable energy generation is proposed outside of existing urban areas, it must be ensured that its delivery does not impact on wildlife designations, or on priority and locally important habitats or species.

Paragraph 8 of Policy SS1 states “The council will continue to work with partners to explore the promotion of a Stour Valley Regional Park and to support the extension and improved connectivity of the Blean Woodland Complex through the Wilder Blean Initiative.”

Policy SS2 – Sustainable design strategy for the district

We are supportive of the inclusion of a requirement for development to achieve carbon neutrality, however we urge the council to consider the impact of carbon emissions during the construction phase of development, as well as during the operation phase. We suggest that paragraph 2 of Policy SS2 be updated to include: “*New development should be designed to achieve Net Zero construction and operational carbon emissions”.*

Our comments above relating to the creation of a Nature Recovery Network, as set out within The Government’s 25 Year Environment Plan, being implemented through Local Nature Recovery Strategies (LNRs), as set out within the Environment Act, should form a key part of spatial planning. Contributing to the delivery of LNRs should form a key part of sustainable design. We suggest that an addition paragraph be included within Policy SS2 which refers to the need for developments to align with emerging LNRs.

Policy SS4 – Movement and transportation strategy for the district

It is not clear how paragraph g(iii) of Policy SS4 aligns with the following extract from the Plan’s strategic objectives; “*Create a transport network with a focus on low-carbon travel to improve air quality and people’s health while ensuring excellent*

access to city and town centres on foot, cycle and by public transport including through intelligent transport systems.” The creation of additional road infrastructure will not deter residents from using their cars as their primary mode of transport, and in fact is likely to encourage it. This, in combination with the ecological harm set to be caused by the proposed link road, raises serious questions regarding the sustainability of this aspect of the Plan. Greater emphasis on active and public transport should be a priority, with the aim of reducing private vehicle usage to reduce emissions.

Policy C15 – Canterbury Golf Course

KWT wish to raise concerns regarding development on land at Canterbury Golf Course. We are a signatory to a Common Position on The Old Park and Chequers Wood SSSI, December 2022. As part of this position we ask Canterbury City Council to ensure that Old Park and Chequers Wood SSSI is effectively buffered, protected and expanded through the Local Plan process. We have called for the extension of the boundaries of the Old Park and Chequers Wood SSSI to cover the whole of Old Park and Chequers Wood, as well as the northern section of Canterbury Golf Course and the priority woodland in the north-east corner of the driving range, by reason of the habitats which these areas provide to endangered breeding birds such as nightingale and turtle dove, along with many other priority species and habitats recorded. Development on the Canterbury Golf Course driving range would threaten nationally important habitats and species both during construction and operation. Noise, lighting and visual disturbance, combined with emissions and dust deposition during construction could result in severe damage to sensitive habitats, and displace birds such as nightingale from their territories. During operation, the lack of a substantial buffer zone would result in a serious threat from increased disturbance from urban encroachment, humans and dogs accessing the site and predation by domestic cats.

Policy C16 - Canterbury Eastern Movement Corridor

In addition to our query above on how the Eastern Movement Corridor aligns with the Plan’s strategic objectives we wish to raise specific concerns regarding this policy. These comments are also supported by the Common Position on The Old Park and Chequers Wood SSSI, December 2022. Whilst we appreciate that the council have taken steps to reduce the environmental impact of this proposed road, the impacts to designated wildlife sites and priority habitats remains significant. The footprint of the road is proposed to pass through both Old Park and Chequers Wood SSSI and Great Stour, Ashford to Fordwich Local Wildlife Site. The citing of the road does not allow the inclusion of a buffer zone for either of these designated wildlife sites, and therefore is at odds with Policies DS18 and DS19. This, in addition to direct loss to ancient woodland resulting from the road, result in KWT objecting to the inclusion of Policy C16.

Policy C26 - Land north of University of Kent

KWT wishes to raise concerns regarding conflict between this policy and the deliverability of Policy DS23 – The Blean Woodland Complex. Please refer to comments made in response to Policy DS23 below.

Policy W5 – Land at Brooklands Farm

The area, apart from allocated open space on site, lacks recreational areas/open space as a whole and therefore there will likely result in an increase in recreational pressure on the woodlands of the Blean Woodland Complex across the A299. These woodlands are designated as Local Wildlife Sites and/or Sites of Special Scientific Interest and are unique ancient woodlands. A development of this size will likely result in an increase of recreational use of the woods, dogs frequenting the woods and traffic accessing the limited parking available at the car parks. KWT would like to see the policy include an impact assessment and mitigation strategy to ensure the integrity of the woods is maintained and impact on the environment and biodiversity is limited. Such a strategy should include substantial open space provision, taking learnings from Strategic Access Management and Monitoring Strategies (SAMMS) to divert recreational pressure from the woodland and promote daily recreation on site.

Policy R1 – Land at Cooting Farm

KWT objects to the allocation of this site as a garden community within the Local Plan on the basis that it is highly likely to have a significant negative impact on Ileden and Oxenden Woods SSSI and ancient woodland. The SSSI is located in a rural area with Adisham and Aylesham being the closest residential areas, both connected to the SSSI via public rights of way. SSSI units are currently recorded as being in either unfavourable or unfavourable recovering condition. We consider that major development adjacent to the woodland will result in increased recreational pressure on the woodland resulting in trampling, disturbance of species through visual disturbance and disturbance from dogs. The Woodland Trust’s review of [Impacts of nearby development on ancient woodland – addendum](#) states that *“Trampling along paths can change understorey vegetation considerably, with different woodland plant species being able to withstand different levels of disturbance. A three-year study by Hamberg et al. (2010) in Finland clearly showed the more frequently a path was used the greater the loss of*

vegetation. Even at low levels (less than 35 visits to a path per year) trampling resulted in a loss of up to 30% of the vegetation along a path. Higher use of paths (up to 550 visits per year) led to a loss of vegetation in excess of 75%. [...] Trampling may also cause disturbance to non-trampled vegetation through changes to micro-climate in the vicinity of the path and increased soil fertility due to disturbance of the soil along the path.” Of further concern is the likely impact of increased recreational pressure and disturbance and predation by dogs on the breeding bird community, which includes nightingale. The presence of a network of public footpaths, which would connect the proposed garden community with the SSSI, and the very small buffer zones indicated on the concept masterplan, greatly increase the likelihood of new residents accessing the woodland on a daily basis for recreation, including daily dog walks. KWT does not feel that it will be possible to reduce the significant negative impacts to Ileden and Oxenden Woods SSSI and ancient woodland to a level which will avoid the decline of SSSI condition.

Policy R1 contradicts the protection afforded to SSSIs through Policy DS18 and through the National Planning Policy Framework. Further, Policy R1 further contradicts Policy DS18(5b) which states that “Any adverse effects on the qualities for which the area has been designated which cannot be avoided (through locating on an alternative site with less harmful impacts) or adequately mitigated, are clearly outweighed by social or economic benefits and a compensatory site of at least equal value is proposed.” At this early stage of Plan preparation, the focus of applying the mitigation hierarchy to the protection of Ileden and Oxenden Woods SSSI and ancient woodland should be focused upon avoidance as it is possible to avoid impacts “through locating on an alternative site with less harmful impacts”. In line with the mitigation hierarchy, which sets out that impacts should be avoided in the first instance, we recommend that Policy R1 is not taken forward to the next stage of the Local Plan review.

Policy R18 – Land north of Popes Lane

The indicative landscape buffer to the east of the site appears to only provide a very narrow buffer zone between the development and the adjacent ancient woodland. We would advise that the buffer zone aligns with guidance issued by the Woodland Trust.

Policy DS6 – Sustainable design

KWT support the inclusion of a policy requirement for new development to achieve net zero operational carbon emissions. As set out above, we urge Canterbury to include construction carbon emissions within this policy requirement in order to encourage low carbon construction methods and the offsetting of residual carbon emissions that cannot be reduced through construction. Whilst Policy DS6(1b) sets out that major development will be required to assess both construction and operational impacts there is no definition of what constitutes major development in this context. We would recommend that this policy requirement be applied to all development brought forward within the Plan period.

Policy DS6 makes reference to a number of Design Standards to promote good design within development proposals. We wish to further refer you to the Building with Nature Standards, the UK’s first green infrastructure benchmark. These standards provide a shared framework of principles for delivering high quality green infrastructure and provides opportunity for the accreditation of developments through the scheme. The Standards can be adopted by local authorities as a benchmark for assessing and accrediting the quality of development. Accreditation of a development by Building with Nature can greatly reduce planning uncertainty, help to engage local communities and greatly increase the quality of developments. In addition, Building with Nature is also being used by planning authorities to develop and test new planning policies. Both strategic planning and development management teams can benefit from using the Building with Nature Standards and Accreditation system, and KWT would be happy to work with you in investigating how this can help to support the delivery of the policies set out through this Plan.

Policy DS13 – Movement hierarchy

As highlighted above, KWT is not clear how other Policies within the Draft Plan align with Policy DS13, particularly Policy C16 - Canterbury Eastern Movement Corridor. Please refer to our previous comments on this issue.

Policy DS18 – Habitats and landscapes of national importance

KWT is fully supportive of the clear statement within Policy DS18(4) that proposals which would materially harm nationally protected wildlife sites will not normally be permitted. On this basis, we wish to refer you to our serious concerns regarding Policy R1 – Land at Cooting Farm. We recommend that further clarity be given within this Policy that proposals must follow the mitigation hierarchy, as set out in paragraph 180a of the National Planning Policy Framework. We recommend that, similar wording be included for nationally protected sites, as is included for protected species, ancient woodland and priority

species. We recommend the following edits (underlined): *“Proposals for development which would materially harm the scientific or nature conservation interest, either directly, indirectly or cumulatively, of sites designated as a Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR) and Marine Conservation Zones (MCZ) for their nature conservation, geological, or geomorphological value will not normally be permitted. All development proposals must follow the mitigation hierarchy (avoidance, mitigation and then compensation as a last resort). Details of how a proposal has been designed to avoid impacts to nationally protected sites should be provided in the first instance.”*

We recommend that Policy DS18(6) be amended to align with paragraph 180a of the National Planning Policy Framework (suggested amendments underlined): *“Proposals which may affect protected and priority species, including great crested newts and ancient woodland, or priority habitats must follow Natural England and other partners advice and guidance and follow the mitigation hierarchy of avoidance in the first instance, then mitigation ~~or~~ and then compensation only as a last resort. If mitigation or compensation are agreed, these will be secured as part of the planning permission using planning conditions or planning obligations.”*

Policy DS19 – Habitats, landscapes and sites of local importance

We wish to raise serious concerns regarding the policy wording included for Policy DS19(1) which states that *“Proposals for development likely to have an adverse effect [on local sites] will only be permitted where the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site. Where development is permitted on such sites, careful site design should be used to avoid any negative impact.”* Further clarity is required as to what constitutes a development proposal which would outweigh harm to a locally designated site. We are seeing an increasing number of applications for renewable energy generation schemes proposed within Local Wildlife Sites and/or on protected and priority habitats. It should be made clear that the nature and climate crisis should be tackled jointly, with renewable energy generation not being at the detriment of local biodiversity.

KWT query how “any” negative impact can be avoid where development is permitted within a Local Wildlife Site. It seems a sensible assumption that allowing development within a locally designated site for wildlife will result in direct loss of habitat. Further, we would be seriously concerned that at a time where the UK Government has committed to protecting 30% of land and water by 2030 if arguments are being made for the destruction of designated wildlife sites under the banner of economic or social benefits. The intrinsic environmental, economic and social value of Local Wildlife Sites should be considered throughout.

Another key concern relating to Local Wildlife Sites is the systematic “site trashing” of these sites in order to facilitate development. A mechanism for preventing this degradation is provided through the Environment Act, relating to BNG. The Act states that *“In relation to any development for which planning permission is granted, the pre-development biodiversity value of the on-site habitat is the biodiversity value of the on-site habitat on the relevant date.”* Where activities have been carried out on the land on or after 30th January 2020 which have reduced its biodiversity value then the biodiversity value of the site should be taken as 30th January 2020. Where habitat data is not available for this date we would advise that the most recent Local Wildlife Site Survey data be used. We suggest that suitable policy wording is added to this policy to prevent the systematic destruction of Local Wildlife Sites to facilitate development.

We further suggest that cumulative impacts to the local site network should be considered through this Plan.

KWT are supportive of wording included in DS19(3), particularly relating to the protection afforded to the Blean Woods Local Landscape Designation. Further clarity on how this designated area compares to that identified as the Blean Complex in Policy DS23 would be useful. To ensure that the biodiversity value of each of these designated landscapes is supported and enhanced we suggest the following addition to Policy DS19(3): *“[...] only be permitted where they conserve and, where appropriate, enhance the special qualities and biodiversity of the landscape.”* Similarly, we suggest the following for Policy DS19(3a) *“[...] or protect, the local landscape character, biodiversity and its special qualities”.*

Policy DS20 – Flood risk and sustainable drainage

KWT would like to highlight that the Government has confirmed the mandatory inclusion of Sustainable Drainage Systems (SuDS) in all new developments. Therefore, Policy DS20, and all other references to SuDS within the Plan, will need to be amended to comply with the new Government policy and ensure that SuDS are incorporated within all new developments to reduce the risk of flooding and water pollution.

Policy DS21 – Supporting biodiversity recovery

As per our comments above regarding the 20% tree cover requirements, which the Trust supports in full, we suggest that DS21(1a) be amended to ensure that the planting of trees and/or creation of woodland is not at the detriment of other important habitats. The following amendment is suggested: *“All new developments should incorporate woodlands, trees and / or street trees in keeping with the habitat network (as detailed within the Local Nature Recovery Strategy for Kent) and the landscape character of the area;”*.

Whilst it is acknowledged that this Local Plan Draft has been produced ahead of the implementation of the Local Nature Recovery Strategy for Kent, we would suggest that the Council consider amending DS21(h) ahead of submission, to reference emerging Strategies, to reflect progress made on the Local Nature Recovery Strategy during the preparation of the Plan.

KWT commends Canterbury on the inclusion of a strong policy for securing 20% Biodiversity Net gain (BNG) on all developments across the District. In order to assist your officers in assessing information submitted in support of BNG we would recommend that DS21(3a) includes a requirement for the BNG metric to be accompanied by suitable maps, for both pre and post development, of habitats reported through the metric. Whilst we feel that overall Canterbury has produced a well thought out BNG policy we do wish to highlight one concern regarding wording within DS21(3d). The inclusion of this text indicates that BNG delivery may be affected or amended in order to satisfy Policy DS24 which related to the delivery of open space. The Council should seek to make it clear through this Plan that BNG and open space delivery should not be seen as competing factors, but should instead be delivered alongside each other, contributing to a network of multifunctional green infrastructure across the District. If it is identified that proposed development sites are unable to accommodate the delivery of 20% BNG, 20% tree cover and additional open space requirements, alongside projected housing numbers, then the sustainability and delivery of these sites should be reassessed. We would suggest the following amendment to DS21(3d) to address this issue: *“Ensuring the provision of biodiversity net gain is designed to support and compliment the ~~does not~~ ~~impede the~~ delivery of open space in accordance with the accessibility, quality and quantity standards set out in Policy DS24”*.

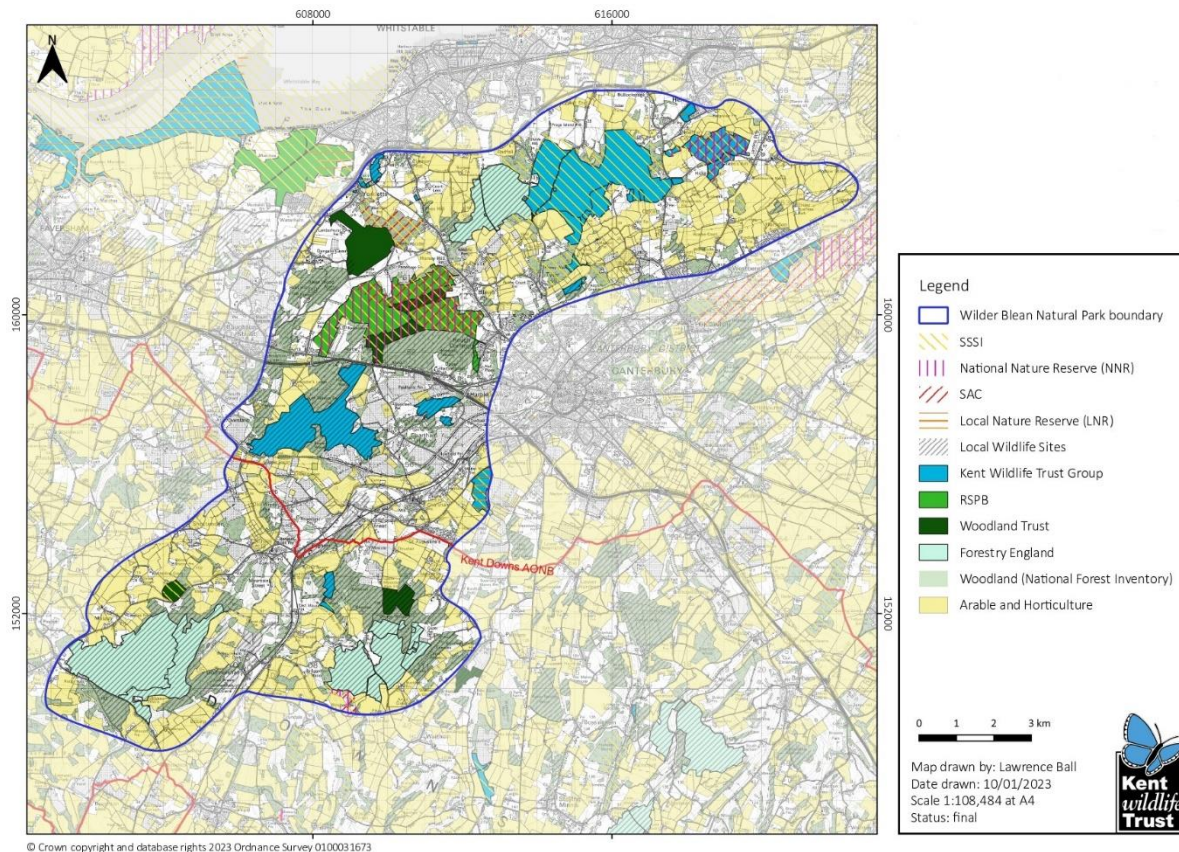
Policy DS23 – The Blean Woodland Complex

KWT are really pleased to see the inclusion of a specific policy for the restoration and expansion of the Blean Woodland Complex. This directly aligns with the ambitions of the Wilder Blean Initiative, a partnership between KWT, the RSPB and Woodland Trust, which a biologically rich, extensive, connected, and resilient ancient woodland, managed through natural processes, where wildlife and people live harmoniously and provide hope for the future of protected areas across the UK. It is not clear from Policy DS23 what area the Plan identifies as the Blean Woodland Complex, and if this aligns with the Blean Landscape Designation as set out in Policy DS19 and the Interactive Map. Below we have included a map (Map 1), which sets out the Blean Complex as considered by the Wilder Blean Initiative, and we encourage you to align Policy DS23 to apply to this geographical area within the Canterbury district.

For clarity, we recommend that Policy DS23(1) would benefit from being split into two points, the first focusing on projects to restore, enhance, expand and connect the woodland and the second which focuses on traditional woodland practices which support the local economy.

As advised elsewhere within this letter, we recommend that future iterations of this plan refer to progress made to develop a Local Nature Recovery Strategy for Kent, which is likely to integrate with or replace Biodiversity Opportunity Areas.

Policy DS23(4) raises a number of concerns for KWT, and this is likely to threaten the deliverability achieving restoration, extension and connection of the Blean Woodland Complex. The land submissions referred to in this Policy were not included in the allocated sites and include potentially important connectivity links from existing woodland to the east and west of the A290. Without expansion south of Clowes Wood there will continue to be a bottleneck which restricts the movement of wildlife. We have this area included in the Blean Complex area, see Map 1. We would be keen to continue to expand our work with the Council, through the Wilder Blean Advisory Group, to align Policy DS23 with the Wilder Blean Initiative.



Map 1: The Blean complex

Policy DS25 – Renewable energy and carbon sequestration

Please refer to previous comments made in response to SS1 relating to renewable energy schemes and Wilder Carbon Comments.

We hope that the comments made within this letter prove useful in the updating of the Canterbury Local Plan. We would be more than happy to hold further discussion with you on any of these issues raised.

Yours sincerely,

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 Kent Wildlife Trust

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