

## Canterbury Draft Local Plan 2040

### Response by Christopher Rootes

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It's good to see increased emphasis on biodiversity, environmental protection and a commitment to action to combat climate change but there is little in the Plan that gives much confidence that these warm words will be matched with commensurate action. Overall, the Plan is a dreadful disappointment. It is likely to contribute to a continuation of the low-quality urbanisation that is covering more and more of the district's green fields in unimaginative and poorly planned housing developments that do not address the housing requirements of Canterbury residents, while at the same time degrading the natural environment, reducing biodiversity, and impairing the health and well-being of communities and individuals.

### Housing

I understand that CCC is attempting to meet nationally-imposed housing targets. But it is doing so by proposing housing developments on ever more unsuitable sites. This is a clear demonstration of the arbitrary and environmentally insensitive nature of those targets. Canterbury is, by many measures, an exceptional and environmentally sensitive city: its complex historical heritage and ecology mean that further urbanisation of the periphery of the city can only be at the expense of the integrity and environmental and ecological context of a city that has at its core a World Heritage Site. This entails an irreversible loss of the city's heritage as well as the degradation of quality of life of residents of the district and the well-being of communities.

These should not be accepted as merely regrettable collateral damage. What CCC should be doing is making a vigorous case for Canterbury to be treated as an exception that, on grounds of its unique combination of special characteristics, needs, for the well-being of its inhabitants and the preservation of its heritage, to be treated with special care, which would justify a much lower housing target commensurate with the actual housing requirements of the district.

The problem is not only with the numbers of housing units, but also with the kinds of housing that are envisaged. High density developments of individual houses with small gardens and restricted parking on peripheral greenfield sites are unlikely to produce well-functioning or properly-serviced communities. Canterbury conspicuously lacks a supply of high quality, spacious apartments of the kind that might lure older 'empty-nesters' out of their 3- and 4-bedroom houses. Such apartment developments would need to be freehold and well connected to services and suitable and accessible public transport; they cannot be left to the existing 'retirement home' developers.

The other housing issue not addressed in the Plan is the consequence of the relentless expansion of the universities. This has encouraged landlords to convert many hundreds of what were formerly family houses into HMOs. The density of HMOs in many streets has passed the tipping point at which private householders find themselves living in characterless streets of minimally managed gardens and no sense of community, with the result that they move out, sometimes to peripheral parts of the district, sometimes further.

The **Vision for 2040** promises that 'Our important habitats and landscapes will be restored and enhanced, supporting the recovery of nature, improving environmental resilience and providing significant increases in biodiversity.' Likewise, the **Corporate Plan** emphasises 'protecting and enhancing the environment across the district', 'Protecting our district for future generations' and 'Growing our district sustainably'.

Yet second among the twelve **Strategic objectives for the district** is 'Support the growth and development of our universities and colleges...' ranking above 'Protect and enhance our rich environment and valued landscapes, creating a network of green spaces, protecting and enhancing green gaps between settlements, supporting nature's recovery and biodiversity and improving the health and wellbeing of our communities' and 'Reduce the causes of climate change and adapt to ensure all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.' In a city which already has perhaps the highest ratio of students to permanent residents of any European city, and which has already suffered the consequences of unconstrained growth in student numbers, continued growth of the universities would jeopardise these other objectives.

The Draft Plan proposes to require 20% biodiversity net gain and a minimum 20% tree cover in new developments of over 300 houses, but this will do little or nothing to compensate for the ecological deserts of existing high-density housing and recently built / approved housing that provides little or no tree cover and no possible biodiversity net gain. It is unclear how a 20% biodiversity net gain or the present biodiversity value of development sites might be measured.

The **Sustainability Appraisal 2024** concludes (6.1.4) that the housing strategy proposed in the Draft Local Plan would lead to negative impacts on air quality, geology, water quality, flood risk, waste, health and sustainable communities with *significant negative impacts on heritage*. Surely, in a city of Canterbury's national and international historical significance, such impacts on heritage alone are grounds for Canterbury to be treated as an exception to national guidelines.

The most egregious example of CCC's proposed sites for new housing is the 'new rural settlement' proposed to be built on lands to the north of the University of Kent (**Policy C12**).

**Policy C12** contradicts a host of other policies, most obviously **Policy DS21** - Supporting biodiversity recovery; **Policy DS22** - Landscape character (particularly 2c. PRoWs, 2d. natural, seminatural, historic and cultural features, 2e. harm to/ failure to enhance landscape, 2f. impacts on landscape context of the historic city, and 2g. impact on rural tranquillity); **Policy DS23** - protecting and re-connecting the Blean Woods Complex; and

**Policy DS26** - Historic environment and archaeology; and **Policy DM18** – light pollution and dark skies.

The **Strategic Land Availability Assessment** (2024) identifies 'Significant negative effects ... for biodiversity (SA Objective 3). The location includes Ancient Woodland and is within 400m of Blean Complex Special Area of Conservation (SAC), West Blean and Thornden Woods Site of Special Scientific Interest (SSSI), Church Woods SSSI and Blean Woods National Nature Reserve (NNR). Blean Pastures Local Wildlife (LWS) is also located within the site.' (5.6.35). Significant negative effects were also assessed for landscape (5.6.36) and the historic environment (5.6.37).

The **Landscape Character and Biodiversity Appraisal 2020** identified The Blean Woodland Complex as a "Biodiversity Opportunity Area (BOA)." It recommended action "To maintain, restore, enhance and create woodland and grassland habitat, as part of the woodland and grassland habitat network of the Blean BOA."; "Maintain the existing narrow single line of development associated with Blean and Tyler Hill villages avoiding backland encroaching towards the woods and maintaining views through gaps in development to the woodland edge." The Appraisal made many recommendations for protection and conservation of the Sarre Penn Valley, including: "Conserve the open landscape and avoid the further introduction of large scale or incongruous elements, particularly where they are visible over ridgelines and from the Stour valley to the south; "Maintain the limited vehicular access to retain rural character and resist proposals for upgrading of tracks and lanes within the area"; and "Maintain the essentially undeveloped character of the area limited to occasional farm buildings."

The **Draft Canterbury Tree and Woodland Strategy Consultation 2022** set out a Vision for 2045:

"The wider Blean complex will be a showcase for Southeast England for innovative rewilding and restoration of ecological functioning woodland. Partners, planners and landowners will be working together to maximise the landscape and biodiversity benefits of woodland at this unique scale."

"The woodlands of The Blean could be expanded to form an even larger continuous block of woodland. There are numerous small and fragmented woodlands in this area, including some isolated and small remaining ancient woodlands."

In the **Canterbury Draft Local Plan 2040**, these recommendations are reflected in Policies DS21, DS22 and DS23. They are wholly incompatible with Policy C12.

Dr Rufus Howard's **Independent Review: Canterbury District Local Plan 2040 – Sustainability Appraisal and Strategic Environmental Assessment** (Greenfriars, May 2024) concludes:

"The Sustainability Appraisal and environmental assessment results clearly identify that the [new settlement on] Land north of the University of Kent will result in significant negative effects, and significant adverse impacts, on biodiversity, geology, landscape, water, heritage, land use and transport. This report finds sufficient supporting evidence to conclude that a new settlement on Land north of the University (C12) is contrary to the principles of sustainable development and the avoidance of significant adverse effects and harm set out in the National Planning Policy Framework (NPPF)."

In short, **Policy C12** would destroy an area of national heritage, biodiversity importance and very high local amenity value. It would, if implemented, result in significant loss of existing biodiversity, productive agricultural land, and the context of a singularly important site of historical, archaeological and ecological significance. It would profoundly change the landscape and the aspect from the various public rights of way (PRoWs) and permissive paths that run through and across the site.

Most prominent and probably most important of these is the PRoW variously referred to as the Crab and Winkle Way, National Cycle Route 1 and the Old Salt Way. This is a very important PRoW, particularly because it is the only all-weather path / cycle way from Rough Common and Harbledown into and through open countryside which is sufficiently removed from traffic noise that it preserves rural tranquillity as well as the satisfaction of connection with ancient woodland and a historic environment. It is much used and valued by pedestrians and runners as well as cyclists.

The start of this PRoW at Whitstable Road provides a safe and visually attractive route to and from Blean School and the University campus. Yet it is precisely this most used part of the PRoW that would be most directly impacted by the proposed 'primary access' to the site. The Blean and Hothe Court Conservation Areas and the Oasis Community Garden would also be severely compromised by this 'primary access'.

However, because what is proposed is a 'linear development', the visual amenity and tranquillity of the Crab and Winkle Way would be degraded for the whole of its length up to the Blean-Tyler Hill road. The context of the heritage sites, scheduled ancient monuments and other only partly explored archaeological sites around the Church of Saint Damien and Saint Cosmus in the Blean would also be severely compromised. There is no way that the impact of a development such as the one now proposed might satisfactorily be mitigated.

### **Blean Woodland Complex (BWC)**

Although the Plan mentions protection for the Long Thin Wood, no mention is made of the equally important West Triangle Wood with its magnificent oak trees that are among the oldest in the district. Sitting directly adjacent to the Crab and Winkle Way, it is inconceivable that it would not be negatively impacted by the development; it would simply not be possible to 'minimise loss of or damage to ancient woodland ... through the provision of the primary access' (Policy C12.3f). It is not at all reassuring that it is proposed merely to 'retain substantial areas of the existing tree cover' (Policy C12.3d); retention of *all* the existing tree cover is essential if the existing biodiversity is to be maintained let alone enhanced.

Most fundamentally, Policy C12 rests upon a limited and fundamentally flawed understanding of the ecology of the **Blean Woodland Complex (BWC)**, which is of national significance.

It is particularly dismaying that CCC, as part of the Regulation 18 consultation and after 'meetings with stakeholders' (but, not, apparently with people with expert knowledge of ecology or the site in question), has adopted a much more restricted definition of the Blean

Woods Complex than the one that previously informed policy and the experience and aspirations of local experts and the Kent Wildlife Trust. This appears to be the result of lobbying by the University of Kent and its agents and in order to suit the convenience of the university rather than the well-being of the environment or the wider community.

There really is no excuse for this because the University's own School of Continuing Education fostered the scholarly multi-disciplinary work of the Blean Wood Research Group which resulted in the book by The Blean Wood Group (edited by William Holmes and Alexander Wheaten) *The Blean: the Woodlands of a Cathedral City*, White Horse Press, Chestfield, 2002. That work makes it clear that the Blean Wood Complex, extending as it does to include Brotherhood Wood on the University campus, should be construed much more broadly than CCC now suggests.

In Kent, with its long history of human exploitation of its woodlands, including to meet the needs of the Cathedral and the city, there may not be many 'ancient trees' (over 400 years old). But as the study makes clear, the dominance of such trees is not necessarily a good indicator of the ancientness or biodiversity relevance of the site or its remaining woodland. In Brotherhood Wood, the 'sheer number of plant species ... greater than many other parts of the Blean' includes not only wood anemone and bluebells but rarer species such as yellow archangel, wood spurge and wood rush (p.137).

In the last 50 years, Hospital and Brotherhood Woods have been reduced and Parkwood has been largely destroyed, all to make way for University buildings. While recent 'compensatory planting' may eventually go some way to replacing lost tree cover, nothing can compensate for the loss of the species-rich soils of these ancient woodlands, or the hedgerows removed for no apparent reason.

The whole site embraced by Policy C12 is historically part of the Blean Woods Complex. The adoption of a much more narrowly circumscribed definition of the BWC runs directly counter to the growing scientific recognition that the ecology of valued and protected sites extends widely, including border lands that have diverse characteristics and habitats that support rare and or protected species. It simply is not enough to specify a 400-metre buffer around woodland for it is the mosaic of woodland, hedgerows, grassland and open fields that is essential to the preservation of biodiversity, particularly for ground-nesting birds such as skylarks.

**If the aspiration to increase the connectivity of the BWC (Policy DS23) means anything, Policy C12 must be removed from the Plan.**

### Postscript

This very day comes a reminder that the University 'is now expecting all modules to include an element of sustainability. **All conveners should consider how they might incorporate adjust some readings, lectures, or assessments to incorporate this discourse.** ... Sustainability is not only a civic and collegial interest; it is also very important to our students. **Over 90% of 2020 NSS respondents agreed that their place of study should actively incorporate sustainability** (up from 88% in 2014). More than 80% of respondents

indicated that they would like to see sustainability actively incorporated and promoted across all courses (up from 71% in 2014). As students prepare for global careers in an era of climate emergency, their environmental literacy is all the more imperative.

Consequently, **the University of Kent has committed to a [curriculum reform](#) in line with [United Nations guidelines](#).**'

'... the University has also committed to a "[Right to Food](#)" initiative'.

**Policy C12** is not only unviable and undeliverable, it is also a serious embarrassment to the University of Kent. It must be abandoned.