



**LANDSCAPE AND ECOLOGY IMPACT
FTC TOPIC PAPER NO.8**



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Introduction

1. This topic paper deals with the landscape surrounding around and setting of Fordwich and also ecology. The landscape includes ancient woodland, TPO woodland and a Conservation Area (the “Fordwich Landscape”), the status of all of which has been fundamentally ignored and/or misunderstood by CCC.
2. There has been no assessment, let alone *proper* assessment of the impact on the Fordwich Landscape of the currently preferred route of the Eastern Bypass (referred to in the Draft Local Plan as an “Eastern Movement Corridor”). Indeed, we pause to observe that in regard to Landscape, Stantec's report at para. 6.1.4 acknowledges:

“In addition to an assessment of the SSSI, a preliminary ecological walkover should be undertaken for the scheme as a whole to identify any significant wildlife and/or features that maybe present along either route so that appropriate measures can be put in place as part of schemes future design stages. The eastern option passes through a woodland at Sandpit Wood subject to a tree preservation order and an area of ancient and semi natural woodland at Moat Rough, south of Stodmarsh Road.” [Underlining added]

3. This topic paper work is not a substitute for the work which CCC should but has not carried out. It does however demonstrate the substantial harm to the Fordwich landscape and ecology which would result should the currently preferred route be pursued. It also demonstrates that of the three routes explored by Stantec, the currently preferred route causes the *most* harm to the Fordwich landscape and possibly also to ecology (something yet to be assessed).

Protected Species and Habitats

4. First (as noted as well by the Friends of Old Park & Chequers Wood) the Eastern Bypass Route would sever ecological connectivity between the SSSI and the Stodmarsh National Nature Reserve (which both form part of the Lower Stour Wetlands Biodiversity Opportunity Area as set out in the Canterbury Landscape Character Assessment and Biodiversity Appraisal (“the Landscape and Biodiversity Assessment”)).
5. The currently preferred Eastern Bypass Route would go through character area F6 as defined in the Landscape and Biodiversity Assessment, which notes that “the river corridor within this LCA is the most downstream part of the LWS and an important aquatic and wetland habitat link into the SSSI which abuts the eastern boundary of the LCA and the Stodmarsh NNR which lies further upstream to the east.”¹ The same page of the Landscape and Biodiversity Assessment notes that there are riverine UK species such as otter and water vole present in this part of the Stour, as well as a good variety of aquatic plants and invertebrates. The Landscape and Biodiversity Assessment concludes that a key aim is “To restore and create species-rich grassland and wetland habitat, as part of the wider network of the Lower Stour Wetlands BOA.”²
6. The currently preferred Eastern Bypass Route would also go through character area G1 (Old Park), which also lies within the Lower Stour Wetlands BOA, and the aim for this area is likewise to protect and enhance acid grassland and woodland habitat as part of the wider network of habitat within the Lower Stour Wetlands BOA.³ Finally, the Eastern Route would also go through character area H6 (Littlebourne Fruit Belt), for which the main aim is also to ‘protect and

¹ Page 201.

² Page 203.

³ Page 222.

enhance woodland habitat and to create wetland habitat, as part of the wider network of wetland and coastal habitat within the Lower Stour Wetlands BOA.⁴

7. The Eastern Bypass Route would therefore go directly through areas that are crucial to the Lower Stour Wetlands, and this severance of ecological connectivity is directly contrary to Policy SS1 and the recommendations of the Landscape Assessment and Biodiversity Assessment, which was commissioned to form part of the Draft Local Plan's evidence base. Despite this, the impact of the Eastern Bypass on the connections between these sites has not been considered, let alone assessed. The Eastern Bypass Route would go against the objectives of Policies SS1 and DS21, in destroying green infrastructure, harming the Stodmarsh NNR and imperilling the ability of development to deliver 20% biodiversity net gain (BNG).
8. Second, the first field north of Stodmarsh Road that the Eastern Bypass would cross is home to Great Crested Newts, which resulted in the Council refusing to grant planning permission for eco-homes on the site.
9. Third, the Eastern Bypass as proposed would not, in fact, avoid going through the SSSI in any event, as the Eastern Bypass Route still goes through the northeast corner of the SSSI. Even if the only material consideration were the SSSI (which it is not), the Eastern Bypass Route would not avoid adverse effects on the SSSI.
10. Fourth, paragraph 2.14 in the supporting text to Policy C11 on the East Canterbury strategic development area explains 'The SDA provides important opportunities to create large new areas of open spaces, with improved ecological connectivity to key natural assets such as Trenley Park Woods.' There is no explanation of how the proposed construction of the Eastern Bypass can be compatible with this aim when the proposal is to place the busiest road in

⁴ Page 268.

Canterbury alongside Trenley Park Wood and cut it off from wild spaces in the rest of the development area. Plainly, it is entirely inconsistent with this aim

11. Surveys for protected species should have been carried out but have not been before a preferred route was selected. There are records of the presence of great crested newts in the Sturry Road area near Broad Oak Nature Reserve (protected under the Habitats Regulations). Great crested newts are fully protected under UK and European legislation: Bern Convention 1979: Appendix II Strictly Protected Fauna Species, Wildlife & Countryside Act (as Amended) 1981, The Conservation of Habitats and Species Regulations 2017 (Regs) (The Conservation of Habitats and Species Regulations 2017 transposed into UK law the EU Habitats Directive Council Directive 92/43/EEC). In view of the range of habitats affected, surveys for a range of protected species including bats and dormouse are also likely to be required and may have a bearing on the design. Sandpit Woods which will be substantially destroyed by the current Eastern Bypass route was recognised in the TPO (see below, and FTC Landscape and Ecology Topic paper No.8) as being “of local importance for nature conservation, particularly as a site for breeding birds”. But this too this has not been assessed or taken into account.
12. There is no evidence that such an ecological walkover has been undertaken in relation to any of the three possible routes, certainly, no proper environmental or habitats assessment has been carried out.

Adverse Impact upon Landscape Character

13. The plans for the Eastern Bypass are inconsistent with national policy, policy SS2 and policy DS26 of the Draft Local Plan. The currently preferred route for the Eastern Bypass would cut through the Fordwich Landscape impacting upon :
 - a. the Fordwich Conservation Area;
 - b. Ancient Woodland, including wildlife;
 - c. TPO Woodland;
 - d. historic Rural Lanes;

- e. local footpaths, and
- f. tranquillity

The Fordwich Conservation Area

14. The entire town of Fordwich is a Conservation Area, an area that the Council has recognised as being of special architectural and historical interest.⁵ This also forms part of the landscape character of the area.
15. The original size of the Fordwich Conservation Area was extended in 1993 expressly to recognise the wider character of Fordwich and the importance of the land included within the extended area to preserve the historic character of Fordwich. As discussed in the FTC Heritage Topic Paper No.2, the Eastern Bypass as currently proposed would cut through much of the Fordwich Conservation Area, and the Conservation Area as a coherent entity would cease to exist. The setting of the listed buildings in Fordwich (see especially Fordwich House) would be irremediably harmed by placing a busy bypass directly to the west and south of them.

Ancient Woodland and Wildlife

16. The currently proposed route would devastate an ancient woodland – Trenley Park Wood:

“The southeast of England has approximately 40% of the country’s Ancient Woodland, 4,394 hectares are within Canterbury District. Areas of Ancient Woodland are found right across the district, of historic significance in their own right and also for the heritage assets preserved within.” A revision of the *Ancient Woodland Inventory for Canterbury district, Kent Report and Inventory Maps* August 2012. [Underling added]

⁵ Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

17. They are also incredibly important for biodiversity:

“Ancient woods are irreplaceable habitats and essential biodiversity reservoirs that provide important ecosystem services. Ancient woodland covers a tiny fraction of the UK’s land mass and soils are a vital component, as the time (centuries or millennia) these soils have taken to form and their relative lack of disturbance means they are hugely complex and diverse.”
[Underling added] (See Annex A *Woodland Trust: Wood Wise* • *Woodland Conservation News* • Spring 2016).

18. This is echoed in advice given jointly by Natural England and the Forestry Commission:

“Ancient woodland

Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for:

- wildlife (which includes rare and threatened species) - there is also [standing advice for protected species](#)
- soils
- carbon capture and storage
- contributing to the seed bank and genetic diversity
- recreation, health and wellbeing
- cultural, historical and landscape value.” [Underlining added]

19. Ancient woodland represents a high quality, high-value irreplaceable habitat which benefits from a higher degree of protection than SSSI. Whilst according to NPPF paragraph 180, development resulting in the loss or deterioration of ancient woodland should only be permitted if there are “wholly exceptional” reasons, the protection afforded to SSSIs is far lower; development affecting SSSIs should “not normally be permitted.”

20. Consistent with this assessment of the importance of ancient woodland, the Canterbury Landscape Character Assessment and Biodiversity Appraisal calls for “proposals to increase access or develop within the woodland, ensuring that the sense of remoteness and tranquillity is retained from along PRoW” to be resisted. (Page 229 – Area G2). The current route of the Eastern Bypass is in direct conflict with this CCC guidance.

21. No assessment has been made of the impact on the ancient woodland although as stated above the impact would be devastating to the woodland.

Severance of Historic Footpaths

22. The Eastern Bypass seeks to cut this community in two, leaving access between the two parts to pedestrians and bicycles along historic trade and religious routes linking Fordwich with Canterbury. This is addressed in more detail in FTC Footpath/Cycleway Severance Topic Paper No. 2.

TPO Woodland

23. TPO Woodland at Sandpit Wood would be substantially destroyed by the currently proposed route of the Eastern Bypass . The reasons why CCC made the order was because:

In the opinion of the Local Planning Authority, the woodlands are of high landscape value being prominent on the upper slope of the south side of the Stour Valley. The woodlands form an important skyline feature, visually continuous with the Trenley Park Wood complex in views from Sturry, Westbere, Hersden and the Stour Valley bottom. They are covered by Policy CC5 of the Kent Structure Plan which seeks to conserve woodlands which contribute significantly to wildlife and the landscape and Policy CC6 which seeks to retain landscape features representative of the Kent Countryside.

The woodlands are of local importance for nature conservation, particularly as a site for breeding birds and are covered by Policy CCI0 of the Kent Structure Plan which have importance for nature conservation.”

[Underlining added]

24. No account, still less a proper assessment has been made by CCC on the impact of these protected features and this area of high landscape value, prominent in the landscape and forming an important part of the skyline. The visually continuous link with Trenley Park Wood (whatever is left after the construction of the Eastern Bypass) will be broken by the currently preferred Eastern Bypass route.

Historic Rural Lanes

25. The proposed route for the Eastern Bypass would slash the historic parish of Fordwich in half by cutting across both Well Lane and Moat Lane. Well Lane and Moat Lane are both bordered by steep banks characteristic of Rural Lanes – crossing these would require significant cuts to get down to the road level and thus the effects on the TPO's Woodland would be very significant. The effects on these Rural Lanes would also be devastating.

Loss of Tranquillity

26. The area south of Stodmarsh Road is more rural than that to the north – it also has more sense of place derived from the Sweet Chestnut Coppice which is a very Kent characteristic. This area is also more tranquil (see below) and more remote, so there would be an adverse change in landscape complexity here too by the Eastern Bypass .
27. The Canterbury Landscape Character assessment and biodiversity appraisal mentions the tranquillity and remoteness of this landscape several times, in particular in relation to Area F6 (p. 204), Area G1 (p 223), G2 (p 229) and H6(p 263).
28. Noise and Lighting both from cars and from any streetlights proposed will have an effect on this aspect of character. Lighting will also have an effect in the dark skies which will be greater here than around Fordwich / Sturry.

Conclusion

29. Overall, due to failure to make any proper assessment, there is a massive lack of detail which is really unhelpful. It's impossible to effectively judge effects as we have no knowledge of the amount of cut and fill which could drastically affect the amount of land taken and therefore effects on things like TPO woodlands and Ancient Woodland. This is also likely to add massively to the costs and viability (see FTC Topic Paper Costing and Viability Topic Paper No.5).
30. Also, effects visually would depend on the cut and fill amongst other things. A line on a plan provides scant little information in this respect, for example there no assessment on things like lighting.
31. The same criticism can be made of the lack of assessment of the adverse impact of the currently preferred Eastern Bypass route on ecology including on legally protected species and their habitats.

32. This lack of detail means it is extremely difficult to draw the full final conclusions on the adverse effect of the Eastern Bypass on the Fordwich Landscape, other than the points above, all detrimental.

33. Moreover more widely, the simple fact that the currently preferred Eastern Bypass route is so much longer means that its effects on the overall landscape and visual resource are likely to be greater than the other routes.