

Date: 17th October 2025

By email only: consultations@canterbury.gov.uk



Kent
Wildlife Trust

Dear Canterbury City Council

RE: Draft Canterbury District Local Plan, Focused Consultation (Regulation 18), September 2025

Kent Wildlife Trust (KWT) welcomes the opportunity to comment again on the Draft Canterbury District Local Plan. KWT provided comments during the previous rounds of consultation; Regulation 18 – Part 1 (January 2023) and Regulation 18 – Part 2 (June 2024). It is understood that due to a vast response during the previous 2024 consultation and due to changes within the National Planning Policy Framework (NPPF 2024), changes have been made to the previous Draft Local Plan. We also understand that this consultation is for feedback on four key areas only, and not on the entire Draft Local Plan again. There will be an opportunity to comment on the Draft Local Plan in its entirety at the Regulation 19 stage. The four key areas include:

- New draft site allocation policies;
- Changes to existing strategic site allocations;
- Gypsy and Traveller draft policies and allocations; and
- Impact of the December 2024 NPPF changes on Canterbury District.

To allow us to complete a comprehensive and targeted response to your consultation, please accept our comments in letter format as opposed to submitted via your questionnaire.

Section 1 – Aligning the Local Plan with new NPPF requirements

KWT recognises the need for Canterbury City Council to ensure its Local Plan aligns with the updated NPPF (2024). We support the Council's intention to adapt its draft policies in response to the new national policy context. However, it is critical that these changes also strengthen the Local Plan's alignment with national environmental commitments, including those set out in the Environment Act 2021, the Nature Recovery Green Paper, and the statutory targets for halting nature's decline by 2030.

Local Plan period and housing needs

KWT notes the proposed adjustment to the plan period (2024/25 – 2042/43) and the updated Local Housing Need (LHN) figure of 1,215 homes per annum. Whilst we acknowledge the statutory requirement to plan for housing needs as identified through the Government's standard method, KWT strongly emphasises that **the delivery of housing must not come at the expense of nature recovery or ecological integrity.**

The NPPF and the Environment Act make clear that sustainable development requires the integration of environmental, social and economic objectives. Therefore, housing growth must be accompanied by a robust evidence base demonstrating:

- The proposed housing numbers and spatial distribution are compatible with environmental limits, including the capacity of local ecosystems, water resources, and designated nature sites;
- That the Habitats Regulations Assessment (HRA) and Environmental Impact Assessment (EIA) process are fully integrated into the decision making and site selection stages; and
- That all new development contributes measurably to Biodiversity Net Gain (BNG), strategic habitat connectivity, and local nature recovery priorities as set out in the Kent Local Nature Recovery Strategy (LNRS).

We urge the Council to ensure that any adjustment to housing targets or timeframes is accompanied by a clear spatial strategy that places ecological capacity and climate resilience at the centre of growth planning. We also urge that all developments, including affordable housing, must be aligned with environmental sustainability principles. We recommend that new housing and affordable housing developments are required to:

- Incorporate high-quality green infrastructure, including accessible natural green space and street tree planting;
- Integrate nature-based solutions (NbS) to reduce long-term costs for residents (e.g., sustainable drainage systems (SuDS), passive cooling, and pollinator-friendly landscaping); and
- Avoid environmentally sensitive areas, including floodplains, areas of high ecological value, and wildlife corridors identified within the LNRS or local biodiversity opportunity areas.

Social rent housing should not be delivered at the expense of environmental standards. There is a clear opportunity for Canterbury to become a leader in affordable, low-carbon, and nature-positive housing delivery.

Economic development and modern economy

KWT supports economic growth that is consistent with environmental limits and contributes to local nature recovery and climate resilience. The Council's emphasis on new forms of economic activity, including digital infrastructure, laboratories, and light industrial uses, must be balanced by strong green growth principles. We therefore recommend that:

- All new employment land allocations are subject to ecological constraints mapping and cumulative impact assessments;
- Sites for "modern economy" uses prioritise low ecological sensitivity areas – not all brownfield sites are suitable for development; and
- The Local Plan embeds a clear policy commitment to nature-positive business development, including on-site habitat enhancements and contributions to the District's Nature Recovery Network.

The Local Plan should explicitly reference the role of natural capital and ecosystem services in supporting long-term economic growth and resilience, particularly in a district heavily reliant on tourism, agriculture, and green space assets.

Water infrastructure and delivery

KWT strongly supports the recognition of water infrastructure as a critical issue for sustainable delivery of development within Canterbury District. The district faces significant constraints relating to water supply, wastewater capacity, and nutrient pollution, which already place severe pressure on sensitive habitats, most notably Stodmarsh SSSI/SAC/ Ramsar site.

The Stodmarsh designated site complex is internationally important for its wetland habitats and associated species, and its ecological integrity is directly dependent on maintaining appropriate water quality and hydrological conditions. It is therefore essential that the Local Plan includes robust and enforceable policies that ensure no deterioration in water quality or hydrological function as a result of development, infrastructure provision or associated cumulative impacts.

In particular:

- New or expanded wastewater treatment infrastructure must not be located where it could negatively affect the Stodmarsh catchment or other sensitive hydrological systems;
- Require that no development proceeds ahead of the demonstratable availability of adequate water and wastewater capacity, verified by water companies and the Environment Agency;
- Support partnership working with the Stour Catchment Partnership and the Kent Nature Partnership to deliver multi-benefit solutions that improve water quality, enhance biodiversity, and build climate resilience;
- Any strategic infrastructure (such as treatment works, pumping stations or discharge points) must be subject to Habitat Regulations Assessment (HRA) and demonstrate beyond reasonable scientific doubt that adverse effects on site integrity will be avoided; and
- The Local Plan should explicitly state that development proposals which cannot demonstrate nutrient neutrality or water quality safeguards will not be permitted.

In addition to protecting sensitive water environments, KWT strongly recommends that the Council's forthcoming Infrastructure Delivery Plan (IDP) explicitly recognises the role of green and blue infrastructure (GBI) as critical components of sustainable infrastructure delivery. The IDP should:

- Identify a strategic district-wide GBI network linking the River Stour, coastal habitats, woodland blocks, and urban greenspaces;
- Integrate GBI networks as equal in status to traditional "grey" infrastructure, acknowledging their multifunctional role in flood management, climate adaptation, biodiversity enhancement, recreation, and public health;
- Identify opportunities to deliver strategic GBI projects across the district, for example wetland creation, river restoration, riparian buffer zones, and sustainable drainage systems (SuDS);
- Ensure that all new development contributes proportionately to the enhancement and connectivity of the district's blue and green corridors, in line with the LNRS and the Stour Catchment Management Plan; and
- Commit to monitoring and maintaining BGI as part of long-term infrastructure management, not as an optional or aesthetic add-on.

KWT supports the Council's intention to improve integration between the planning system and the water industry. However, this must go beyond process alignment, it should embed ecological safeguarding and water efficiency standards within all stages of decision-making and infrastructure delivery. All water-related policies should prioritise NbS such as constructed wetlands, rewilded watercourses, natural flood management schemes, which provide dual benefits for biodiversity and climate resilience whilst reducing reliance on energy-intensive engineered systems.

In aligning the Local Plan with the new NPPF, Canterbury City Council has an important opportunity to ensure that all elements of growth, housing, infrastructure, and economic development, actively contribute to nature's recovery and climate resilience. KWT urges the Council to take a genuinely integrated approach, ensuring that environmental objectives are not treated as secondary to development pressures but as essential foundations of a sustainable, liveable district.

Section 2 – Why the proposals are needed

Delivering housing needs sustainably

KWT acknowledges the Government's emphasis on housing delivery and the associated housing need figure of 1,215 dwellings per annum for Canterbury District. However, housing growth must be determined within environmental limits and not at the expense of ecological integrity. The NPPF and the Environment Act 2021 make clear that Local Plans must achieve a balanced approach across the economic, social and environmental pillars of sustainable development. We therefore strongly recommend that the Council's evidence base, including its Strategic Land Availability Assessment (SLAA), Sustainability Appraisal (SA), and HRA demonstrates:

- That the cumulative scale and distribution of proposed housing growth is compatible with the environmental capacity of the district, including constraints relating to water resources, biodiversity, landscape sensitivity, and flood risk;
- That no sites are allowed where their development could result in adverse effects on the integrity of protected sites, particularly Stodmarsh SSSI/SAC/Ramsar, the Blean Woodland Complex and The Swale SPA, or other sensitive designated habitats;
- That growth is focused on locations that can be supported by existing or upgraded infrastructure, without exacerbating existing water quality or nutrient neutrality constraints; and
- That opportunities are maximised for NbS and BNG to form strategic network of ecological enhancement across the district.

Housing growth targets must be realistically deliverable without compromising the Council's legal obligations under the Habitats Regulations and the Environment Act 2021.

The role of an up-to-date Local Plan

KWT agrees that an up-to-date Local Plan is vital to provide certainty, shape sustainable growth, and safeguard areas of high ecological and landscape value from speculative or inappropriate development. However, the protection of greenspaces and habitats must not be treated as secondary to the delivery of housing targets. The Local Plan should clearly set out:

- A spatial growth hierarchy that directs development away from areas of ecological sensitivity;

- Strong policy protection for the district’s designated sites, priority habitats, ancient woodlands and ecological networks; and
- A commitment to implement the LNRS, ensuring that all development contributes positively to nature’s recovery and climate resilience.

Site allocations and spatial distribution

KWT welcomes the removal of certain sites, specifically C12 - Land north of the University of Kent. It is understood this site was removed due to concerns regarding provision of suitable access, impact on ecology, including the loss of ancient woodland. This demonstrates an encouraging recognition of environmental limits and ecological sensitivity, and a positive step toward aligning the Local Plan with the Council’s climate and biodiversity emergency declarations, including its stated commitment to protecting and restoring the Blean Woodland Complex. The removal of this allocation demonstrates that Canterbury City Council has listened to stakeholder concerns and recognised the significant ecological constraints associated with this site.

As set out in our previous consultation responses, development north of the University Campus would have posed substantial and irreversible risks to the Blean Complex SAC, surrounding SSSIs, and LWS, including through increased recreational pressure, habitat fragmentation, disturbance, and potential loss or degradation of ancient woodland. It also would have conflicted with several policies within the Draft Plan itself (including DS17, DS18, DS19, and DS23) as well as the Council’s wider vision for enhancing landscape connectivity across the Blean.

By removing Policy C12, the Council has helped to safeguard one of Kent’s most ecologically valuable landscapes and supported ongoing partnership work through the Wilder Blean Initiative, which KWT leads in collaboration with the RSPB and the Woodland Trust. This initiative aims to restore and reconnect ancient woodland habitats across the Blean Complex, creating a more resilient and nature-rich landscape for both wildlife and people. We encourage the Council to retain this position in future iterations of the Local Plan and to ensure that the Blean Complex and its surrounding buffer areas continue to be protected from inappropriate development that could compromise their ecological function. This will help ensure that the Local Plan is not only compliant with the Habitats Regulations but also truly reflective of Canterbury’s leadership role in addressing the biodiversity and climate crises.

Section 3 – Draft Local Plan policies for consultation

KWT acknowledges the Council’s attempt to refine strategic site allocations and infrastructure proposals, and we are pleased with some of these changes. However, we remain concerned that the scale and location of the proposed growth pose significant risks to biodiversity as well as the ecological integrity of local, national and international designated conservation sites. Whilst the draft plan references the need for landscape and biodiversity enhancement and GBI, these are often treated as secondary or compensatory elements rather than fundamental, spatially structures components of development design. The policies should be strengthened to make nature recovery, climate resilience, and habitat protection integral to the layout, phasing and delivery of all SDAs. KWT recommends that all SDA policies be revised to:

- Explicitly require measurable BNG of at least 20%, with on-site delivery wherever feasible, linked to the emerging LNRS;

- Integrate strategic GBI as primary structuring elements within masterplans, providing multi-functional benefits for wildlife, flood mitigation, active travel, and human wellbeing;
- Include specific policy safeguards to protect functionally linked land (FLL) supporting designated sites such as Thanet Coast and Sandwich Bay SPA/Ramsar;
- Ensure that nutrient neutrality and hydrological safeguards are achieved prior to any commencement of development; and
- Require HRAs at project level for each SDA and related infrastructure, with clear avoidance and mitigation measures established before allocation confirmation.

South West Canterbury Strategic Development Area – Site N1, Merton Park

KWT notes that significant revisions to the Merton Park proposals, including the removal of the A2 slip roads and changes to access and transport strategy. Whilst the deletion of this major road intervention may reduce direct habitat loss, the scale of the development (approximately 1,930 dwellings plus major sports, school and commercial facilities) still represents a substantial urban expansion in a sensitive landscape adjacent to Biodiversity Opportunity Areas (BOA). Key concerns include:

GBI and Biodiversity Integration

- The policy acknowledges a green infrastructure strategy but lacks clear, binding requirements for ecological connectivity across the site and with the wider landscape, particularly towards the Elham Valley Railway corridor and Cooper’s Pit RIGS.
- The plan should require a comprehensive GBI Framework Plan at the masterplanning stage, co-designed with local environmental stakeholders (including KWT), to ensure net biodiversity gain, habitat connectivity, and carbon sequestration.
- The policy should reference the Kent LNRS and the Canterbury Landscape Character and Biodiversity Appraisal as key evidence bases for GBI design.

Water Quality and Infrastructure

- The policy proposes a new wastewater treatment works (WWTW) “*at an appropriate location within the site, or in combination with Site 10 (Policy CF1).*”
- KWT strongly cautions against siting any new or expanded WWTW within the Stour catchment unless it can be demonstrated, through a full HRA, that there will be no adverse effects on the integrity of Stodmarsh SSSI/SAC/Ramsar.
- The Local Plan must make clear that no development shall proceed until adequate wastewater treatment capacity that ensures nutrient neutrality is in place.

East Canterbury Strategic Development Area – Sites N4 – N7

The East Canterbury SDA represents one of the largest proposed expansions within the district, with approximately 2,380 new dwellings across Sites N4 and N5, plus significant supporting infrastructure. KWT acknowledges the improved focus on active travel and landscape buffers however remains concerned about potential cumulative impacts on ancient woodland, Priority Habitats, Tenley Park Wood Local Wildlife Site (LWS) and hydrological connections to the Lampen Stream and Stodmarsh Complex. Our key concerns include:

Ancient Woodland and Priority Habitats

- Policy N4 (Land south of Littlebourne Road) rightly requires retention of ancient woodland and veteran trees, but there is no mention of size of buffers, nor their composition (e.g., semi-natural habitat). The policy should explicitly include a minimum distance, such as 30m, to protect root zones, microclimate, and ecological functions of the ancient woodland and veteran trees.
- The policy should explicitly prohibit lighting, noise or drainage changes within these buffer zones.

FLL and Ecological Connectivity

- The Plan's reference to assessing FLL is welcomed. However, this must be underpinned by updated evidence from Natural England and local ecological datasets.
- The SDA should deliver strategic-scale habitat creation, for example, wetland and woodland linkages between Old Park and Chequer's Wood, Trenley Park Wood LWS and the wider Stour Valley.

Water Infrastructure and Stodmarsh Safeguarding

- Both N4 and N5 propose new WWTW. As with Merton Park, no new or expanded works should discharge into watercourses hydrologically connected to Stodmarsh.
- NbS (e.g., constructed wetlands) should be prioritised for water management, with long-term management secured via legal agreements.

GBI Integration

- KWT strongly supports the policy recognition of wetland creation opportunities along the Lampen Stream. This should be expanded into a requirement, not an optional consideration.
- The SDA should demonstrate a district-scale GBI network linking Trenley Park Wood LWS, the Lampen Stream, and Old Park and Chequer's Wood in alignment with the Kent Nature Partnership's Biodiversity Strategy and LNRS.

Cumulative and In-Combination Effects

- The combined development at N4, N5 and related sites (N6, N7) presents major potential for in-combination impacts on air quality, hydrology, and recreational pressure on nearby designated sites.
- KWT recommends a strategic HRA and Ecological Impact Assessment (EclA) for the whole SDA cluster before any site allocations are finalised.

Whitstable and Herne Bay – Site W4, Land at Brooklands Farm

KWT has made previous comments regarding policy W4, including a consultation response to the active planning application (CA/25/00779). Our main concerns are around the potential ecological impacts that the proposed development may have on both the site itself and the wider landscape, particularly the onsite and adjacent ancient woodlands, statutory designated sites, LWS and important habitats for a range of protected and priority species. Convict's Wood LWS, an important connective stepping stone for the wider Blean Complex Special Area of Conservation (SAC), sits within the application site. The LWS is designated for its ancient woodland inventory, including 19 ancient woodland indicator species. It's also an important site

for woodland birds and passerines and comprises a good bryophyte flora. KWT's principal concern is the risk of adverse effects from both direct and indirect impacts associated with the proposed development. These include:

- Increased artificial lighting affecting nocturnal species and woodland edge habitats;
- Noise, water and dust pollution during the construction phase;
- Ongoing light, noise and water pollution and heightened recreational pressure during the operational phase, including disturbance from people and dogs and predation from domestic cats.

The current plans propose a 15m buffer between the built development and ancient woodland. However, given the scale and intensity of the proposed development, we consider this buffer insufficient to safeguard the ecological integrity of Convict's Wood. National best practice and Natural England standing advice recommend a minimum buffer of 15 metres, but this should be extended up to 30 metres or more where development scale or sensitivity warrants it, as is clearly the case here. This highlights the need for the Local Plan to include strong, unambiguous policy wording requiring appropriate buffer zones for all ancient woodland, LWS, and Priority Habitats, proportionate to the sensitivity of the site and the nature of the proposed development.

In addition, the current planning application for W4 fails to assess the cumulative pressures of this and other nearby development on the Blean Complex SAC. The Blean Complex SAC comprises a network of ancient woodlands and designated sites that collectively form a key ecological stronghold in North Kent. A growing number of large-scale housing developments in this area are adding to the pressure on these habitats through increased recreation, disturbance from nearby human activity, and gradual erosion of their ecological buffers and connectivity. These cumulative impacts result in the incremental reduction in a conservation site's ability to maintain its ecological integrity and to act as a functional network. The Blean Complex SAC is recognised under both national and local policies as a priority for conservation. SACs are internationally important areas characterised by NPPF as "*areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites*". SACs are protected under the European Union's Habitat Directive, which is transported into UK law by the Habitats and Species Regulations 2017. The purpose of SACs are to help conserve the habitat and species identified in Annex I and II of the Directive. They are the habitats and species that are most in need of conservation at the European level (excluding birds). The Blean Complex SAC is designated for its sub-Atlantic and medio-European oak or oak-hornbeam forests, with its conservation objectives to "*ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features [sub-Atlantic and medio-European oak or oak-hornbeam forests]*". It is therefore vital that the Local Plan ensures all proposed allocated sites, including W4 at Brooklands Farm:

- Avoid direct or indirect harm to the Blean Complex SAC and associated connective stepping stone habitats, such as ancient woodlands and LWS to the SAC;
- Require comprehensive ecological assessments, including cumulative impact assessments (CIAs) as part of any allocation or masterplanning process;
- Incorporate substantial natural buffers (minimum 30m) to protect ancient woodlands from edge effects such as light, noise and nutrient enrichment;

- Secure long-term management and monitoring of woodland buffers and green corridors through planning obligations or management agreements; and
- Deliver strategic GBI enhancements that contribute positively to the wider Blean woodland network and the objectives of Kent's LNRS.

The Local Plan should clearly state that development proposals resulting in the harm to the integrity of the Blean Woodland Complex SAC will be considered contrary to policy and therefore will not be supported.

Overall, KWT welcomes the opportunity to comment on Canterbury City Council's Draft Local Plan, Focused Consultation (Regulation 18) September 2025. We recognise and commend the Council's efforts to update the Plan in line with the 2024 NPPF, to respond to community feedback, and to strengthen the evidence base across key policy areas. Looking ahead to the Regulation 19 stage, we encourage Canterbury City Council to continue working closely with conservation partners, statutory agencies, and local stakeholders to ensure that the final Local Plan delivers genuinely nature-positive development. By placing nature recovery and ecological connectivity at the heart of the Plan, the Council can demonstrate local leadership in tackling the twin crises of biodiversity loss and climate change, whilst shaping a sustainable and resilient future for the district. KWT remains committed to supporting the Council in this process and welcomes ongoing collaboration to ensure that the final Local Plan reflects both national policy requirements and the local ecological priorities that make Canterbury District unique.

We hope that our comments and suggestions are useful. If you have any questions, please do not hesitate to contact me.

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