

Date: 14th May 2026

Ref: Canterbury's Local Plan Regulation 19 Consultation

By email only: consultations@canterbury.gov.uk



Dear Canterbury City Council

RE: Draft Canterbury District Local Plan: Regulation 19 consultation (March – May 2026)

Kent Wildlife Trust (KWT) welcomes the opportunity to comment on the Draft Canterbury District Local Plan. KWT provided comments during the previous rounds of consultation; Regulation 18 – Part 1 (January 2023), Regulation 18 – Part 2 (June 2024) and the Regulation 18 Focused Consultation (September 2025).

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

1. Spatial Strategy for the District

We recognise at paragraph 1.10 that the emerging Local Plan must respond to the updated National Planning Policy Framework (NPPF, 2024). We support the Council's intention to adapt its draft policies to reflect the revised national policy context and housing requirements. However, it is equally important that these changes strengthen the Local Plan's alignment with national environmental legislation and commitments, including the Environment Act 2021, the Nature Recovery Green Paper, and the Government's statutory target to halt the decline of species abundance by 2030. The scale of growth proposed through the Plan must therefore be accompanied by a robust and measurable commitment to nature recovery, biodiversity enhancement and environmental resilience.

Likewise, we recognise the Council's commitment to a brownfield-first approach, as set out in paragraph 1.12, and support the principle of prioritising previously developed land where appropriate. However, it is important to acknowledge that brownfield land can also provide habitats of exceptionally high biodiversity value, particularly for invertebrates, open mosaic habitats, Red List bird species such as nightingale, and early successional species. Brownfield sites should not automatically be considered of lower ecological value than greenfield land. Development proposals must therefore be informed by robust ecological assessment to ensure that the right development takes place in the right location. There are nationally significant examples which demonstrate the biodiversity importance of brownfield land, including Lodge Hill SSSI and Swanscombe Peninsula SSSI, both of which support rare and threatened species assemblages. Canterbury's Local Plan should therefore make clear that ecological value, rather than land classification alone, must guide site suitability and development decisions.

Paragraph 1.15 would also benefit from stronger wording around sustainable development objectives. In particular, the list of outcomes should explicitly refer to the delivery of sustainable and genuinely affordable housing, alongside high-quality green and blue infrastructure. Green and blue infrastructure is essential not only for biodiversity and climate resilience, but also for public health, active travel, water management and community wellbeing. Embedding this more clearly within the spatial strategy would strengthen the Plan's commitment to sustainable growth.

Vision for the District to 2042/43

Within the Vision for the District to 2042/43, the paragraph on "Improved connectivity" should place greater emphasis on active travel. The vision should specifically reference walking, cycling and other forms of active transport, and recognise the important role that high-quality green infrastructure can play in supporting these connections. Green corridors, accessible open spaces and nature-rich routes can encourage healthier lifestyles, reduce car dependency and improve ecological connectivity simultaneously.

District Wide Key Diagram

While Sites of Special Scientific Interest (SSSIs) are identified on the District Wide Key Diagram, along with International Wildlife Sites, the map should also include Local Wildlife Sites (LWS). Although locally designated, these sites perform an essential role as ecological stepping stones and contribute significantly to habitat connectivity across the district. Their inclusion would better reflect the full ecological network and support the Plan's stated objectives around biodiversity recovery and environmental enhancement.

The Key Diagram also appears to focus primarily on terrestrial habitats. The River Stour should be clearly identified, given its importance as a strategic ecological corridor and aquatic habitat within the district. Rivers and associated blue infrastructure are fundamental components of ecological networks, biodiversity recovery and climate resilience, and their omission from a strategic diagram is a notable gap. We also recommend that the River Stour and other existing blue infrastructure are included within the associated Policies Map.

Environmental Strategy for the District

We welcome the specific reference to Stodmarsh and the recognition of its ecological sensitivity. However, the Blean Woods Woodland Complex should also be explicitly referenced within this section. The Blean represents the largest continuous area of ancient woodland in south-east England and is of exceptional ecological importance at both regional and national level. Given its significance for biodiversity, landscape character, carbon storage and public access to nature, it should be recognised alongside other key environmental assets identified within the strategy.

Policy SS1 – Environmental Strategy for the District

KWT welcomes the strong emphasis within Policy SS1 on protecting and enhancing both statutory and non-statutory conservation sites across the district. However, the policy would benefit from explicit reference to the protection and restoration of Canterbury's rivers, streams and associated blue infrastructure networks. Watercourses such as the River Stour are ecologically important habitats and wildlife corridors, while also playing a vital role in flood management, climate resilience, water quality and public wellbeing. Their omission from the policy risks underrepresenting the importance of freshwater ecosystems within the district's wider environmental network. This is particularly timely following the King's Speech (13th May 2026), which referenced the commitment to a Clean Water Bill, a significant moment for the water environment and an important step toward addressing a system that has failed communities and nature for decades. The Local Plan should reflect this direction of travel by championing a long-term, catchment-based approach that tackles pollution at source, creates space for nature recovery, and supports healthier, more resilient river systems capable of adapting to climate change and increasing extreme weather events.

We strongly support the requirement for a minimum 20% Biodiversity Net Gain (BNG) for major developments. This represents a positive and ambitious approach which goes beyond the statutory minimum and demonstrates a meaningful commitment to nature recovery across the district. However, it will be important that the Council ensures BNG delivery prioritises high-quality, locally relevant habitat creation and long-term ecological management, rather than relying on fragmented or disconnected measures.

We also support the policy's support for renewable and low-carbon energy infrastructure. However, renewable energy development should not come at the expense of biodiversity, irreplaceable habitats or the wider natural environment. The policy wording should therefore be amended to make clear that renewable and low-carbon energy proposals must be appropriately located and designed to avoid adverse impacts on designated sites, priority habitats, ecological networks and landscape character. The transition to net zero must work alongside nature recovery objectives rather than competing with them.

Sustainable Design Strategy for the District

Paragraph 1.29 should be strengthened to state that "high-quality *sustainable* design" is a key priority of the Local Plan. Sustainability should be embedded throughout the design process, ensuring development contributes positively to climate resilience, biodiversity enhancement, water efficiency, sustainable transport

and long-term community wellbeing. This would better reflect the Plan's wider environmental ambitions and national policy direction.

Paragraph 1.35 should also be amended to recognise the important role of environmental non-governmental organisations (eNGOs) in supporting sustainable and nature-positive development. Early engagement with eNGOs and ecological stakeholders can help improve scheme design, identify opportunities for biodiversity enhancement and ensure developments better respond to local environmental sensitivities and ecological networks. This would also help create a more streamlined and efficient planning process. KWT's engagement with developers often occurs after the submission of planning applications during the consultation stage, at which point ecological concerns and recommendations frequently require amendments to proposals. In many cases, these concerns are subsequently supported by Kent County Council, planning officers and local councils, resulting in delays while applicants revise schemes and submit additional information. Proactive engagement with eNGOs at the pre-application stage is therefore vital not only for protecting and enhancing nature, but also for improving certainty for applicants, streamlining the planning process and reducing delays at the application stage.

Policy SS2 – Sustainable Design Strategy for the District

Criterion 1 of Policy SS2 should make explicit reference to the incorporation of renewable and low-carbon technologies within development proposals, including measures such as solar panels, air source heat pumps and other forms of on-site renewable energy generation. Embedding these measures into policy would help ensure development contributes meaningfully towards achieving net zero targets and improving long-term energy resilience.

Criterion 7 should be strengthened to prioritise the provision of high-quality, accessible green spaces within developments themselves. While encouraging access to nature is important, increased recreational pressure on existing natural spaces can result in significant impacts on biodiversity through littering, anti-social behaviour, disturbance to wildlife and dog fouling. Major developments should therefore provide sufficient on-site green infrastructure, including multifunctional open spaces and natural greenspaces, to meet the recreational needs of new communities and help reduce pressure on existing statutory and non-statutory wildlife sites.

Criterion 8 should also be amended to encourage engagement with local eNGOs where development proposals are located within close proximity to statutory or locally designated wildlife sites. This would help ensure that ecological sensitivities are appropriately considered at an early stage and support more collaborative, environmentally informed development outcomes.

Policy SS3 – Development Strategy for the District

Criterion 3 should be amended to clarify that “previously developed land with *low biodiversity value* will be prioritised for development”. While a brownfield-first approach is supported in principle, brownfield sites can often support important and sometimes nationally significant habitats, particularly for invertebrates, breeding birds and open mosaic ecosystems. Ecological value should therefore be a key consideration in assessing site suitability, rather than land classification alone.

The policy should reinforce the principle of delivering the right development in the right location. Robust ecological assessment should inform site allocations and development decisions to ensure that environmentally valuable brownfield sites are protected where appropriate and that development avoids unacceptable harm to biodiversity and ecological networks.

Policy SS4 – Economic Strategy for the District

Policy SS4 would benefit from stronger recognition of the green economy and the role of eco-tourism within the district's future economic growth. Canterbury's internationally important landscapes, wildlife sites and natural environment are significant assets which contribute not only to biodiversity and public wellbeing, but also to sustainable tourism and local economic resilience. Greater emphasis on nature recovery, sustainable land management and green skills would strengthen the policy's alignment with wider environmental objectives.

The policy could also acknowledge opportunities for alternative, nature-led visions for strategic sites within the district. A clear example of this is the proposed Blean Biopark, which has been developed collaboratively by KWT, the Save The Blean local campaign group, the Crab and Winkle Line Trust and other partners, alongside community engagement with Canterbury residents. The proposed Blean Biopark presents a viable alternative vision to the currently proposed 2,000-home development associated with the University of Kent landholding (known as C12 in previous Draft Local Plans). This alternative vision demonstrates how the land could instead become a thriving and accessible space connecting people, nature, culture, heritage and education.

The Blean Biopark would focus on the conservation and enhancement of the natural environment through rewilding initiatives, biodiversity restoration, innovative ecological solutions and opportunities for community wellbeing, learning and engagement. Importantly, the proposals also demonstrate how environmental enhancement and economic resilience can work together, including through supporting the University's research, teaching and funding ambitions in ecology, sustainability, food and farming. Recognising innovative, nature-led approaches such as the Blean Biopark within Policy SS4 would strengthen the Local Plan's commitment to the green economy, sustainable tourism and long-term environmental resilience.

Policy SS6 – Infrastructure Strategy for the District

Policy SS6 references the proposed Broad Oak Reservoir scheme. Given the scale and potential environmental implications of this infrastructure project, the policy should ensure that any associated development is subject to robust environmental assessment and demonstrates clear protection and enhancement of biodiversity, water quality and surrounding habitats. Particular regard should be given to potential impacts on designated sites, hydrology, landscape character and ecological connectivity.

The policy should also recognise the importance of integrating nature-based solutions within infrastructure delivery wherever possible, ensuring that infrastructure projects contribute positively towards environmental resilience and biodiversity recovery alongside their primary function.

Policy SS7 – Local Plan Review

Policy SS7 should include a commitment to reviewing the Local Plan against emerging environmental legislation, policy and statutory targets. This should specifically include the Environment Act 2021, the Nature Recovery Green Paper and other relevant environmental and climate legislation introduced during the Plan period.

Given the rapidly evolving national policy landscape surrounding biodiversity, climate change and nature recovery, it is essential that the Local Plan remains responsive to new legal requirements, environmental targets and best practice guidance. Incorporating this commitment within the review policy would help ensure the Plan remains effective, up to date and aligned with national environmental ambitions throughout its lifetime.

2. Canterbury

Policy C10 – Land at Merton Park

KWT acknowledges that significant revisions have been made to the Merton Park proposals since the Regulation 18 consultation stage, including the removal of the proposed A2 slip roads and changes to the access and transport strategy. While the removal of this major road intervention may reduce direct habitat loss and landscape fragmentation, the proposed allocation still represents a substantial urban expansion comprising approximately 1,950 dwellings alongside major sports, education and commercial facilities within a sensitive landscape adjacent to Biodiversity Opportunity Areas (BOAs). As such, significant concerns remain regarding biodiversity impacts, ecological connectivity, water infrastructure and the overall soundness of the allocation.

We welcome elements of Criterion 3, particularly the references to retaining existing hedgerows and vegetation at Cooper's Pit RIGS, enhancing the existing Stuppington Lane green corridor, and improving habitat and pollinator connectivity across the site and wider landscape. The inclusion of references to the disused Elham Valley Railway corridor and priority habitats is also positive. However, despite these references, the policy lacks

sufficiently robust and binding requirements to ensure meaningful ecological connectivity, long-term habitat management and measurable biodiversity enhancement across the site.

Criterion 3 should therefore require the preparation of a comprehensive Green and Blue Infrastructure Framework Plan at the masterplanning stage, co-designed with local environmental stakeholders such as KWT, Canterbury City Council and the local community. This framework should demonstrate how the allocation will deliver measurable BNG, ecological connectivity, climate resilience and long-term habitat management across the entire site and surrounding landscape. The policy should also explicitly reference the Kent and Medway Local Nature Recovery Strategy and the Canterbury Landscape Character and Biodiversity Appraisal as key evidence bases informing the design and delivery of green infrastructure.

We note that Criterion 3(a) requires assessment of the site's potential to be functionally linked land (FLL) in relation to designated wildlife sites. Given the site's proximity to ecologically important habitats and corridors, this assessment will be critical and must be informed by robust ecological evidence collected across appropriate seasons. We agree with concerns raised by Save Wincheap Orchards and Fields that the site appears to support a complex mosaic of habitats which contribute to wider ecological connectivity within the landscape.

In particular, we note Save Wincheap Orchards and Fields' evidence regarding the orchard west of Stuppington Lane, which reportedly contains more than 16,000 fruit trees, including veteran apple trees. Whilst not formally characterised as Priority Habitat Traditional Orchard, looking at Google Earth aerial images it is clear that this orchard has been present since at least the 1940's. Criterion 3(e) states that existing orchard areas should be "incorporated and enhanced as part of the Open Space provision where possible"; however, this wording is weak and lacks certainty. Veteran trees are irreplaceable habitats protected under national planning policy. The policy should therefore include a much stronger requirement for the retention, protection and long-term enhancement of existing orchard habitat and veteran trees wherever present on site. We agree with Save Wincheap Orchards and Fields that the current indicative masterplan and land use proposals provide insufficient clarity regarding how orchard habitats, along with the veteran trees, would be retained and enhanced in practice.

We also note Save Wincheap Orchards and Fields' concerns regarding the site's importance for protected and declining species. The group has recorded evidence of Red and Amber-Listed bird species, including Spotted Flycatcher, alongside bat activity, badger setts, slow worms and other species of principal importance. The presence of veteran trees, hedgerows, orchards and scrub habitats further increases the likelihood that protected and priority species are present across the site. Comprehensive ecological survey work should therefore be undertaken, with the results fed into the design of the development to ensure ecologically important features are avoided direct impacts, protected and enhanced. Given the scale of development proposed, the Local Planning Authority must ensure that the Mitigation Hierarchy is rigorously applied in accordance with the NPPF and the Environment Act 2021.

We also share concerns raised by Save Wincheap Orchards and Fields regarding potential weakening of the district-wide requirement for 20% BNG under Policy DS21. KWT strongly supports the 20% BNG requirement. Given the ecological sensitivity of the site, the policy should clearly confirm that development must achieve the full 20% BNG requirement alongside adherence to the statutory Mitigation Hierarchy.

We are also concerned by the approach to open space and off-site enhancement, as stated on page 45 of the Draft Local Plan: *"To achieve high density sustainable development on the Merton Park site, the council will accept a proportion of open space to be delivered through off-site enhancements"*. While off-site habitat creation and/or enhancement may contribute to wider ecological recovery, it must not be used to justify the overdevelopment of ecologically sensitive land or the loss of existing high-value habitats on-site. Currently, there is a lack of sufficient evidence to support the suitability, availability and long-term effectiveness of any proposed off-site compensation measures. The allocation must first demonstrate how impacts will be avoided and minimised on-site before compensation is considered. This concern highlights the need for our suggested amendments to Policy SS2 – Sustainable Design Strategy for the District; where criterion 7 should be strengthened to prioritise the provision of high-quality, accessible green spaces within developments

themselves. Major developments, such as C10 Land at Merton Park, should provide sufficient on-site green infrastructure, including multifunctional open spaces and natural greenspaces, to meet the recreational needs of new communities to help reduce pressure on existing statutory and non-statutory wildlife sites. The inclusion of accepting off-site enhancements for Policy C10 within the Draft Local Plan does not follow the Mitigation Hierarchy and risks fundamentally undermining its purpose, as well as all other mentions of applying the Mitigation Hierarchy within the Draft Local Plan. By introducing off-site enhancement measures at this early stage, the policy appears to bypass the requirement to first avoid impacts, then minimise harm, and fully explore on-site opportunities before off-site compensation is considered as a genuine last resort. Off-site compensation for green space should only be considered once all opportunities to avoid and mitigate impacts on-site have been demonstrably exhausted, not embedded as an assumed solution within the allocation itself. If sufficient and appropriate on-site green infrastructure and enhancements cannot be accommodated within the allocation boundary, this raises concerns as to whether the scale of development or number of proposed houses is appropriate for the site in the first place. It suggests the proposed development may be too large or intensive to be delivered in a genuinely sustainable and nature-positive way.

Criterion 1(b)(vi) and Criterion 5(a), which relate to the provision and phasing of a new wastewater treatment works (WWTW), raise significant concerns given the ongoing water quality and nutrient neutrality issues affecting the Stodmarsh designated sites. KWT strongly cautions against the delivery of any new or expanded wastewater infrastructure within the Stour catchment unless it can be conclusively demonstrated through a full Habitats Regulations Assessment (HRA) that there would be no adverse effects on the integrity of the Stodmarsh SSSI, SAC and Ramsar site. The policy should make explicit that no development can proceed until adequate wastewater treatment infrastructure and nutrient neutrality solutions are secured and operational.

While Criterion 4 contains a number of positive measures relating to active travel, walking, cycling and public transport connectivity, the policy should also ensure that these routes are designed sensitively to avoid increased recreational pressure and disturbance impacts on existing wildlife habitats and ecological corridors. Green corridors and open spaces should prioritise biodiversity value and ecological functionality alongside recreational use.

Finally, we agree with Save Wincheap Orchards and Fields that the orchards, open landscapes and ecological networks surrounding Merton Park form an important part of Canterbury's natural and cultural heritage. Traditional orchards within Kent have experienced significant historic decline, and remaining orchard landscapes now represent highly valuable ecological, historic and community assets. The Local Plan's own vision refers to protecting valued open spaces and improving biodiversity and ecological connectivity; however, substantial further evidence, policy strengthening and ecological safeguards are required before Policy C10 can be considered environmentally sound and consistent with national planning policy and environmental legislation.

As currently drafted, KWT does not consider that the allocation sufficiently aligns with Canterbury City Council's own emerging policies and objectives set out throughout this Draft Local Plan. In particular, there appears to be a clear tension between the Council's stated ambitions around biodiversity recovery, climate resilience, the Mitigation Hierarchy, green and blue infrastructure, sustainable development and the protection of valued landscapes, and the scale and intensity of development proposed at Merton Park. While the policy contains positive references to habitat connectivity, orchard retention and green infrastructure, these commitments are not currently supported by sufficiently robust or enforceable policy wording to ensure meaningful ecological protection and enhancement can realistically be delivered. The proposed scale of development, combined with uncertainty around 20% BNG delivery, off-site enhancements, wastewater infrastructure and long-term habitat protection, risks undermining the Council's own environmental objectives and the overarching vision for a "thriving environment" set out within this Draft Local Plan.

KWT therefore considers that, in its current form, Policy C10 does not adequately demonstrate how the allocation can avoid unacceptable harm to biodiversity, maintain ecological functionality or deliver the level of environmental enhancement expected by the Council's own draft policies and strategies.

East Canterbury Strategic Development Area

Policies C15 – Land south of Littlebourne Road and C16 – Land south of Bekesbourne Lane

KWT recognises that the East Canterbury Strategic Development Area (SDA) seeks to deliver a comprehensive approach to growth, infrastructure and sustainable transport in a highly accessible location. We welcome elements of the draft policies which seek to prioritise active travel, create strategic areas of green and blue infrastructure, improve habitat connectivity and recognise the environmental sensitivities associated with the area. In particular, we support references to the Lampen Stream corridor, Trenley Park Wood LWS, Old Park and Chequer's Wood, and the requirement for development to assess the site's potential to comprise FLL associated with designated wildlife sites.

However, given the scale of development proposed across Policies C15 and C16, amounting to approximately 2,560 dwellings alongside major infrastructure, roads, schools and wastewater treatment facilities, KWT remains concerned about the cumulative and in-combination ecological impacts of the East Canterbury SDA as a whole. The scale of growth proposed has the potential to significantly affect ancient woodland, priority habitats, hydrological networks, ecological connectivity and the wider Stodmarsh SAC/SPA/Ramsar catchment unless significantly stronger environmental safeguards are embedded within the policy wording.

We welcome Policy C15 criterion 3(c) and Policy C16 criterion 3(c), which require the retention of all ancient woodland and ancient or veteran trees. However, the policies currently fail to specify the minimum buffer requirements necessary to genuinely protect these irreplaceable habitats. KWT strongly recommends that both policies require an absolute minimum of 30m semi-natural buffer around all ancient woodland and veteran trees, with the possibility for it to extend to 50m depending on scale of indirect impacts, consistent with Natural England and the Woodland Trust's standing advice. These buffers should not simply comprise landscaped amenity space but should instead consist of appropriately managed semi-natural habitat capable of protecting root systems, maintaining ecological functionality and preventing long-term indirect impacts associated with urbanisation. In addition, the policies should explicitly prohibit lighting, drainage infrastructure, noise-generating development and other urbanising effects within these buffer zones. Without clear safeguards, the long-term ecological integrity of ancient woodland and veteran trees could be compromised through edge effects, changes in hydrology, increased recreational pressure and artificial light spill. The current wording referring to woodland enhancement "where possible" is insufficiently robust for development of this scale and sensitivity.

KWT welcomes the recognition throughout Policies C15 and C16 of opportunities to improve ecological connectivity and create strategic-scale green and blue infrastructure. In particular, we strongly support the references to wetland creation associated with the Lampen Stream under Policy C15 criterion 3(g), as well as wider ambitions to enhance connectivity with Old Park and Chequer's Wood and Trenley Park Wood LWS. However, these measures should be strengthened from optional opportunities into firm requirements embedded within a comprehensive district-scale Green and Blue Infrastructure Framework for the entire SDA.

The East Canterbury SDA presents a significant opportunity to deliver meaningful nature recovery through the creation of interconnected wetland, woodland, grassland and pollinator habitats linking existing ecological assets across the wider landscape. The Local Plan should therefore require a strategic Green and Blue Infrastructure Framework Plan, informed by the Kent and Medway LNRS, the Kent Nature Partnership's Biodiversity Strategy, and the Canterbury Landscape Character and Biodiversity Appraisal. This framework should be prepared collaboratively with ecological stakeholders, including KWT, at the earliest masterplanning stage.

KWT also welcomes the requirement under Policies C15 and C16 to assess the sites' potential to comprise FLL in accordance with Policy DS20, as was similarly referenced under Policy C10. However, given the internationally important nature conservation designations associated with the Stodmarsh SAC/SPA/Ramsar complex, these assessments must be supported by robust and up-to-date ecological evidence, including current Natural England guidance, seasonal bird surveys and local ecological datasets. The scale of

development proposed across the East Canterbury SDA creates significant potential for impacts on habitats that may support designated bird species and other wildlife associated with the wider Stodmarsh ecological network. We also seek further clarity from the Council regarding the implications should ecological surveys confirm that parts of Policies C15 and C16, or indeed other allocated sites such as C10, comprise FLL associated with designated sites. The Draft Local Plan currently requires assessment of FLL potential, but it is unclear how the findings of those assessments would influence the principle, scale or layout of development allocations. If surveys identify land as functionally linked to internationally designated sites, the Council must clearly explain how this would be addressed through the Mitigation Hierarchy and whether allocations would be reconsidered, reduced or removed where adverse effects cannot be ruled out. Without this clarity, there is a significant risk that the Local Plan allocates development on environmentally sensitive land without sufficient certainty that impacts on internationally protected wildlife sites can be avoided.

The proposed wastewater treatment works within Policies C15 and C16 raise further significant concerns. Paragraph 2.20 acknowledges that wastewater infrastructure associated with the SDA may discharge into the Lampen Stream, which feeds into the Stodmarsh catchment, and that “*additional mitigation measures may be required.*” KWT does not consider this wording sufficiently precautionary given the ongoing nutrient neutrality and water quality concerns affecting Stodmarsh. The Local Plan should instead make clear that no development shall proceed until it can be conclusively demonstrated, through a robust HRA and scientific evidence-base, that there will be no adverse effect on the integrity of the Stodmarsh SAC/SPA/Ramsar site, either alone or in combination with other plans and projects. In addition, nature-based solutions (NbS), including constructed wetlands and integrated sustainable drainage systems, should be prioritised as part of water management and wastewater mitigation strategies across the SDA. Such measures could deliver multiple benefits including biodiversity enhancement, flood attenuation, water quality improvements, climate resilience and public access to nature. Long-term management and monitoring arrangements for these features should also be secured through legally binding agreements.

Whilst KWT supports the emphasis on active travel infrastructure throughout Policies C15 and C16, including upgrades to Spring Lane, improvements to public rights of way and enhanced cycling and pedestrian connectivity, we remain concerned about the wider cumulative impacts associated with the proposed road infrastructure and strategic growth across East Canterbury. In particular, the combined impacts of Policies C15, C16, C17 and wider South Canterbury allocations could place substantial pressure on surrounding habitats through increased recreational disturbance, fragmentation, air pollution, lighting, hydrological changes and urbanisation effects. KWT therefore strongly recommends that Canterbury City Council prepares a comprehensive strategic-level Ecological Impact Assessment (EcIA) and HRA for the East Canterbury SDA as a whole prior to the finalisation of site allocations. Assessing sites individually risks underestimating the cumulative ecological impacts arising from multiple interconnected developments across this sensitive landscape. A coordinated strategic assessment is essential to ensure the Local Plan remains consistent with national planning policy, the Environment Act 2021 and the Council’s own ambitions relating to biodiversity recovery, ecological resilience and sustainable development.

Removal of Land north of University of Kent (previously known as Policy C12)

KWT strongly welcomes Canterbury City Council’s decision to remove the allocation for Land north of the University of Kent (previously Policy C12) from the Draft Local Plan. We understand that the site was removed due to concerns relating to suitable access arrangements, ecological impacts and the potential loss and deterioration of ancient woodland. This represents a positive and encouraging recognition of the environmental constraints associated with the site and demonstrates a more appropriate alignment between the Local Plan and the Council’s climate and biodiversity emergency declarations. The removal of this allocation also demonstrates that Canterbury City Council has listened to the substantial concerns raised by environmental organisations, local communities and other stakeholders regarding the ecological sensitivity of this landscape and the incompatibility of large-scale development in this location with the Council’s own environmental objectives and draft planning policies.

KWT particularly welcomes the fact that this decision safeguards opportunities for long-term landscape-scale nature recovery within the Blean. The land north of the University campus forms a strategically important area

for strengthening habitat connectivity between existing woodland blocks and supporting the wider objectives of the Wilder Blean Initiative, which KWT leads in partnership with the RSPB and the Woodland Trust. The removal of this allocation therefore represents a significant positive step toward delivering a more resilient and connected ecological network across one of Kent's most important woodland landscapes and aligns with Policy DS27 – The Blean Woodland Complex.

We also welcome the opportunities this creates to further progress alternative nature-positive visions for the area, including the emerging Blean Biopark proposal developed collaboratively by KWT, Save The Blean, the Crab & Winkle Line Trust and other partners. The Blean Biopark presents an innovative alternative vision focused on rewilding, biodiversity restoration, sustainable land management, education, heritage, research and community wellbeing. Importantly, it demonstrates that environmental protection and economic opportunity are not mutually exclusive. The proposal has significant potential to support eco-tourism, green jobs, academic research, sustainable investment and public engagement with nature, while also contributing to Canterbury's wider ambitions around climate resilience, health and sustainable economic growth.

KWT encourages Canterbury City Council to continue supporting landscape-scale environmental recovery across the Blean Woodland Complex and its surrounding buffer areas. Protecting this landscape from inappropriate development will help ensure the Local Plan is not only compliant with the Habitats Regulations and national planning policy, but also genuinely reflective of Canterbury's leadership role in addressing the biodiversity and climate crises.

3. Whitstable

Policy W2 – Whitstable Harbour

KWT welcomes the recognition within Policy W2 and supporting paragraphs 3.5 – 3.7 that Whitstable Harbour is both an important working harbour and an environmentally sensitive coastal location requiring careful and coordinated regeneration. We particularly support the requirement for a comprehensive Supplementary Planning Document (SPD) informed by the Whitstable Harbour Strategic Plan, as well as the acknowledgement of the nearby internationally and nationally designated ecological sites and the importance of the harbour for roosting birds, particularly turnstone.

The inclusion of paragraph 3.7 is strongly welcomed, specifically the recognition of The Swale SPA, The Swale Ramsar Site, The Swale SSSI and the Swale Estuary Marine Conservation Zone, alongside the identified turnstone roost within Whitstable Harbour. However, whilst these important ecological designations and species sensitivities are acknowledged within the supporting text, the policy wording itself does not specifically reference these statutory sites or the turnstone roost and hotspot area. Given the ecological importance and sensitivity of the harbour and surrounding coastline, KWT recommends that Policy W2 itself is amended to explicitly recognise and protect these designated sites and important bird roosting areas to ensure ecological safeguards are embedded as a clear strategic requirement rather than deferred primarily to the SPD stage. Given the ecological sensitivity of the harbour and surrounding coastline, the policy itself should explicitly state that development proposals must avoid adverse effects on the integrity of internationally designated sites, protect important supporting habitats and FLL, and minimise disturbance impacts on roosting and overwintering bird species.

South Whitstable – Strategic Development Area

KWT recognises that the South Whitstable SDA is intended to deliver significant new housing and community infrastructure in a sustainable location, alongside improvements to active travel connectivity, education provision and green infrastructure. In particular, KWT welcomes the recognition within paragraphs 3.17 and 3.18 of the importance of ecological connectivity, green wedges and the protection of undeveloped land associated with the A299 corridor. The references to enhancing links to Benacre Wood and Convict's Wood, protecting separation between settlements, and safeguarding the ecological function of green infrastructure spaces are all positive components of the strategy. The retention of green wedges between Whitstable, Chestfield and South Street is particularly important in maintaining both ecological connectivity and landscape character, whilst helping to avoid coalescence between settlements. These areas should remain genuinely

multifunctional green infrastructure delivering biodiversity, landscape, climate resilience and public access benefits, rather than fragmented or overly formalised open space.

However, despite these positive elements, KWT remains concerned about the scale and cumulative ecological impacts associated with the South Whitstable SDA, particularly given its proximity to ancient woodland, LWS, priority habitats and land which may function as important ecological corridors or FLL associated with designated sites along the North Kent Coast. Whilst the draft Plan includes references to ecological enhancement and green infrastructure, stronger safeguards and clearer policy requirements are needed to ensure these allocations can be delivered without unacceptable harm to biodiversity and landscape character. KWT welcomes the requirement across the SDA allocations to assess the sites' potential to comprise FLL in accordance with Policy DS20. However, as raised in relation to Policies C10, C15 and C16, the Draft Local Plan does not explain how the Council would respond if ecological surveys confirm that parts of these sites function as FLL supporting qualifying bird species associated with internationally designated sites. This creates significant uncertainty. If surveys identify functionally linked habitat, it is unclear whether development areas would be reduced, layouts amended, or whether mitigation alone would be considered acceptable. The Local Plan should provide greater clarity regarding how findings of FLL would influence the developable area, site capacity and overall allocation strategy in order to demonstrate compliance with the Habitats Regulations and the precautionary principle.

KWT also remains concerned regarding the cumulative recreational pressure likely to arise from the significant increase in population proposed across the SDA. Increased footfall, dog walking and disturbance could place additional pressure on nearby ancient woodland, LWS and priority habitats unless robust strategic mitigation and long-term monitoring measures are secured. The Local Plan should therefore require a coordinated recreational mitigation and visitor management strategy across the wider South Whitstable SDA, rather than relying solely on individual site-level mitigation measures. In addition, the draft Plan should place greater emphasis on delivering high-quality habitat creation and ecological restoration through the wider green infrastructure network. This should include species-rich grassland, wetland features, native hedgerow enhancement, woodland connectivity and long-term ecological management secured through legally enforceable management plans. BNG delivery should prioritise meaningful on-site habitat creation which strengthens ecological connectivity across the wider landscape.

Policy W4 – Brookland Farm

KWT welcomes several elements within Policy W4 itself, including the requirement to retain ancient woodland and veteran trees, avoid new access routes through ancient woodland, assess the site's potential to comprise FLL, and provide significant areas of open space and landscape buffering around Convict's Wood LWS and along the southern edge of the site. The commitment under criterion 4(b) to utilise existing walking and cycling routes through ancient woodland whilst explicitly prohibiting new connections through ancient woodland is particularly supported and appropriately reflects the sensitivity of these irreplaceable habitats. However, whilst the policy requires the retention of ancient woodland and veteran trees, it does not specify minimum buffer distances or appropriate buffer composition. The current active planning application for Brookland Farm proposes 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. 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. Ancient woodland is an irreplaceable habitat, and impacts arising from urbanisation can extend well beyond the woodland boundary through edge effects, changes in hydrology, trampling, invasive species introduction and increased disturbance.

KWT is also concerned that the policy's reliance on existing routes through ancient woodland may still result in significantly increased recreational pressure on sensitive habitats due to the scale of development proposed. Whilst no new routes are proposed, the substantial increase in residents is likely to intensify use of these woodland corridors unless appropriate visitor management, access controls, interpretation, monitoring and alternative greenspace provision are secured through the development.

The requirements under criterion 3(e) and 3(g) for significant areas of open space and landscape buffering are welcomed, particularly in relation to Convict's Wood LWS and the southern edge of the site. However, the policy should provide stronger wording to ensure these areas prioritise ecological functionality and habitat connectivity rather than predominantly amenity-led landscaping. Habitat creation within these corridors should include species-rich grassland, native scrub, wetland features and structurally diverse native planting to maximise biodiversity value and climate resilience.

KWT also notes that the associated Brooklands Farm active planning application has already identified several ecological concerns which remain highly relevant to the proposed allocation. In our previous representations on that application, KWT raised concerns regarding the absence of specific beaver surveys despite suitable nearby watercourses and the species' protected status, the lack of comprehensive reptile survey work across suitable habitats, and the acknowledged permanent loss of skylark breeding habitat without adequate mitigation or compensation proposals. In particular, the Environmental Statement's acceptance of a residual adverse effect on skylark at the local level is concerning given skylark's status as a Priority Species under the NERC Act. The Local Plan should therefore require robust species mitigation, compensation and long-term monitoring strategies where impacts on protected and priority species cannot be avoided.

In addition, the current planning application for W4 fails to assess the cumulative pressures of this and other nearby development on the Blean Woodland Complex. The Blean Woodland Complex 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.

Policy W5 – Land South of Thanet Way

KWT acknowledges that Policy W5 seeks to deliver housing, a new Park and Bus facility, local community infrastructure and improved sustainable transport connections in a location adjoining the existing urban area. The policy's references to landscape enhancement, habitat connectivity and the need to assess the site's potential to comprise FLL are welcomed, alongside the proposed enhancement of woodland associated with Benacre Wood and the provision of green infrastructure along the southern boundary of the site. However, KWT remains concerned regarding the ecological impacts associated with development at this site, particularly given its proximity to Duncan Down LWS, Benacre Wood, priority habitats and wider ecological networks associated with the surrounding countryside. Whilst the policy includes some positive requirements, further strengthening and clarification is required to ensure that biodiversity impacts are fully avoided, mitigated and compensated in accordance with national planning policy and environmental legislation.

KWT particularly welcomes criterion 3(c), which seeks to provide natural and semi-natural open space and woodland planting adjacent to Benacre Wood. However, the policy should provide greater certainty regarding the extent, quality and long-term management of these buffers. Any buffer to existing woodland and priority habitat should comprise species-rich semi-natural habitat and be protected from lighting, drainage changes, recreational impacts and other urbanising influences. The policy should also explicitly require long-term ecological management and monitoring arrangements secured through a Landscape and Ecological Management Plan (LEMP).

KWT remains concerned regarding the relationship between the proposed Park and Bus facility and Duncan Down LWS. In our previous representations on the live planning application for this site, KWT objected to the inadequate ecological buffer proposed between the LWS and the car park infrastructure. We recommended a minimum 20m semi-natural buffer comprising scrub, hedgerow and tree planting, together with protective measures during construction to avoid accidental encroachment and damage to both the LWS and adjacent priority hedgerows. The Local Plan policy should therefore include stronger wording requiring substantial semi-natural habitat buffers to Duncan Down LWS and any retained priority habitats.

KWT also continues to have concerns regarding protected species impacts identified through the planning application process. Our previous consultation response raised significant concerns regarding the lack of

detail surrounding reptile mitigation and receptor areas, including uncertainty regarding the size, location, enhancement and long-term management of the proposed receptor habitat. We strongly advised that an appropriately sized reptile receptor area connected to the wider landscape should be identified and enhanced prior to any translocation works taking place. Similarly, KWT raised concerns regarding impacts on breeding birds and brown hare associated with the proposed development. Our previous representations highlighted uncertainty regarding the presence of breeding skylark on-site and recommended either further surveys or appropriate compensation habitat where impacts could not be avoided. We also identified likely impacts on brown hare habitat and recommended species-specific surveys, habitat retention and off-site compensatory habitat provision to support the local population. These concerns remain relevant to the draft allocation and demonstrate the ecological sensitivity of the site and surrounding farmland landscape.

KWT also remains concerned regarding the cumulative impacts arising from this allocation in combination with the wider South Whitstable SDA allocations, including Brooklands Farm, Golden Hill and Bodkin Farm. The cumulative scale of development has the potential to result in significant in-combination effects on ecological connectivity, recreational pressure, protected species, landscape character and habitat function.

Policy W7 – Bodkin Farm

KWT recognises the strategic need for new education infrastructure within the district, including the provision of a new secondary school. However, as set out in our response to planning application CA/24/00224, significant ecological concerns remain regarding the proposed allocation at Bodkin Farm, particularly in relation to impacts on ancient woodland, habitat fragmentation and the loss of habitat used by Species of Principal Importance.

The policy's requirement for landscape buffers adjacent to ancient woodland is welcomed, alongside the recognition within Policy W7 that development should provide natural and semi-natural open space adjacent to ancient woodland and along the site boundaries. However, the policy currently lacks sufficient detail regarding the size, composition and long-term management of these buffers. As highlighted in our previous consultation response, the site lies immediately adjacent to Purchas Wood ancient woodland, which is already heavily constrained by surrounding development and infrastructure. The proposed allocation therefore risks further isolating and fragmenting this important habitat unless substantial semi-natural buffer zones and continuous ecological corridors are secured through the policy wording.

KWT also remains concerned regarding fragmentation of onsite Habitats of Principal Importance, including hedgerows, linear woodland and ponds, together with the absence of continuous habitat corridors across the site. Our previous review of the planning application identified that the proposed layout relied heavily on isolated habitat pockets rather than coherent ecological networks capable of supporting species movement. The policy should therefore more clearly require the delivery of connected green infrastructure corridors across the site, linking Purchas Wood and surrounding habitats in accordance with Policy DS21 and the wider Nature Recovery Network.

In addition, the policy does not currently address impacts on farmland birds and Species of Principal Importance, despite ecological surveys for the planning application identifying breeding and wintering skylark within the site. KWT remains concerned that the loss of open arable habitat could result in significant adverse effects for skylark and other farmland bird species unless robust mitigation and compensation measures are secured. The policy should therefore require a detailed mitigation and management strategy for Species of Principal Importance, including long-term habitat provision and management.

Whilst KWT welcomes elements of the green infrastructure strategy within Policy W7, including the retention of open space buffers and opportunities for landscape enhancement, stronger policy safeguards are required to ensure development avoids unacceptable impacts on ancient woodland, priority habitats, species and ecological connectivity. Without these amendments, KWT does not consider the allocation fully aligns with national planning policy, the Mitigation Hierarchy, or Canterbury City Council's own draft policies relating to biodiversity recovery and habitat protection.

4. Rural Areas

Policy R24 Broad Oak Reservoir and Country Park

KWT recognises the strategic importance of securing long-term water infrastructure for the district and wider region and acknowledges the potential for Broad Oak Reservoir and Country Park to deliver significant recreational, educational and biodiversity benefits if planned and managed appropriately. We therefore welcome the inclusion of stronger references within Policy R24 to habitat creation, wildlife enhancement and ecological connectivity, particularly compared to earlier iterations of the Local Plan. However, given the scale and sensitivity of the proposal, it is essential that biodiversity and nature recovery are treated as fundamental components of the scheme rather than secondary benefits alongside recreation and infrastructure delivery. The site lies adjacent to highly important ecological assets including West Blean & Thornden Woods SSSI, ancient woodland, and LWS, within a landscape that forms part of the wider Blean Complex and contributes to strategic ecological connectivity across north Kent. As such, the scheme presents both significant risks and substantial opportunities for nature recovery.

KWT strongly supports the inclusion of criteria under Part 3 of the policy requiring the retention and enhancement of ancient woodland, protection of the West Blean & Thornden Woods SSSI, and the provision of substantial landscape buffers. We also welcome the reference to Turtle Dove and Nightingale habitat enhancement, consistent with RSPB guidance. However, the current wording of criterion 3(h), which states that proposals should “consider the enhancement and restoration” of Turtle Dove and Nightingale habitat, is insufficiently robust and ambiguous. Given the significant declines of these species nationally, and the ecological importance of the surrounding landscape, the policy should contain much stronger and more definitive wording requiring habitat enhancement and restoration measures to be delivered as part of the scheme, rather than merely considered. Strengthening this wording would provide greater certainty that the development will contribute meaningfully toward species recovery and wider nature recovery objectives. These additions are positive steps which better reflect the ecological sensitivity of the site and the potential for the scheme to contribute toward Local Nature Recovery Strategy objectives and wider landscape-scale recovery ambitions.

Policy R24 should go further in embedding a clear commitment to substantial habitat creation and ecological restoration across the site. Whilst the policy references birdwatching infrastructure and recreational facilities, it does not sufficiently emphasise the importance of delivering large-scale habitat creation, ecological resilience and low-disturbance areas dedicated primarily to wildlife. KWT therefore recommends that the policy wording is strengthened to explicitly require:

- The creation of extensive priority habitats which contribute toward the recovery and expansion of the Blean ecological network;
- A zoned approach to the country park, including areas with limited or no public access to minimise recreational disturbance to sensitive species;
- Habitat creation and management informed by NbS principles and climate resilience objectives; and
- Long-term ecological management and monitoring secured through a Landscape and Ecology Management Plan.

Likewise, due to the scale and nature of the development, it is also essential that the policy fully recognises that impacts on habitats and species will extend well beyond the main reservoir site itself. Construction activities, new infrastructure, increased recreational pressure, hydrological changes, lighting, noise and changes in land use have the potential to generate cumulative and in-combination impacts across the wider Blean landscape and associated ecological networks. This includes impacts arising from the proposed pipeline routes, pumping stations, highway improvements and increased visitor pressure on surrounding designated and undesignated sites. The policy should therefore make explicit reference to the need for comprehensive cumulative impact assessment, informed by up-to-date ecological evidence, and require mitigation measures that address both on-site and wider landscape-scale impacts.

As highlighted in our Regulation 18 Part 2 consultation (3rd June 2024), we are concerned regarding the proposed realignment of the Sarre Penn and the potential implications for compliance with the Water

Framework Directive. Full consultation with the Environment Agency will therefore be essential. The policy should require that any river realignment or associated infrastructure demonstrably avoids deterioration of waterbody status and seeks opportunities for wider river restoration and enhancement across the Sarre and Nethergong Penn catchment. Public access routes adjacent to watercourses must also be sensitively designed to minimise disturbance to riparian habitats and species. We continue to strongly recommend the provision of minimum 20m river corridor buffers to support ecological connectivity, reduce human-wildlife conflict and protect riparian habitats, particularly given the presence of beavers within the wider catchment.

KWT welcomes the opportunity presented by Broad Oak Reservoir to become an exemplar of multifunctional green-blue infrastructure that integrates water security, climate resilience, public access and landscape-scale nature recovery. If designed appropriately, the scheme could help reduce recreational pressure on nearby designated wildlife sites whilst simultaneously creating significant new habitat and opportunities for environmental education and engagement with nature. However, this will only be achievable where ecological considerations are embedded at the heart of the masterplanning process and supported by robust policy wording that prioritises long-term biodiversity outcomes alongside recreational and operational objectives.

5. District-wide Strategic Policies

Policy DS13 – Sustainable Design

KWT broadly welcomes the ambitious and comprehensive approach set out within Policy DS13 and strongly supports the Council's recognition that sustainable design must be embedded from the outset of the development process. The emphasis on high-quality placemaking, community engagement, climate resilience, green infrastructure integration, active travel, and long-term stewardship is particularly positive and reflects many of the principles required to deliver genuinely sustainable development. We strongly support the policy requirement for development proposals to respond to local character, landscape, heritage, ecological context, and existing communities, alongside the requirement for design codes and comprehensive masterplanning on larger sites. The inclusion of provisions relating to green and blue infrastructure, tree-lined streets, biodiversity features, multifunctional open space, and sustainable movement networks is welcomed and demonstrates a positive shift toward more holistic and nature-inclusive design.

KWT particularly welcomes criterion 3(m) requiring the integration of green and blue infrastructure into site layouts for multifunctional benefits including biodiversity enhancement and flood mitigation, alongside criterion 3(n) requiring tree-lined streets and wider tree planting opportunities. Similarly, criterion 3(o) encouraging biodiversity features such as swift bricks, bat boxes and hedgehog highways is supported in principle. However, stronger wording should be considered to ensure these measures are delivered consistently and meaningfully across developments, rather than remaining optional design aspirations.

The policy's mention of efficient land use and higher densities in sustainable locations is acknowledged. However, this must not come at the expense of ecological protection, green infrastructure provision, urban tree canopy, or accessible natural greenspace. Higher density development should only be supported where it can clearly demonstrate high-quality design outcomes, appropriate green infrastructure integration, and no adverse impacts on biodiversity, landscape character, or residential amenity.

KWT also welcomes the requirement for major developments to be informed by masterplans, design review, and community engagement. This is particularly important for Strategic Development Areas, where coordinated landscape-scale planning is essential to ensure ecological connectivity, sustainable transport integration, and long-term stewardship are embedded from the earliest stages of site design.

Whilst the policy is generally strong, there are areas where wording could be strengthened to provide greater certainty and consistency in decision-making. For example, stronger reference should be made to measurable ecological outcomes, including the retention and enhancement of existing habitats, avoidance of habitat fragmentation, provision of meaningful ecological buffers, and integration of NbS as standard rather than optional features.

Policy DS20 – Habitats of international importance

KWT strongly welcomes the comprehensive approach taken within Policy DS20 and broadly supports the Council's recognition of the exceptional importance and sensitivity of internationally designated wildlife sites across the district, including SACs, SPAs and Ramsar sites. The policy provides an important framework for ensuring that development complies with the Habitats Regulations and appropriately addresses recreational, hydrological, water quality, air quality, and ecological impacts arising from new development.

We particularly welcome the recognition within supporting text paragraphs 6.94 – 6.98 of the importance of FLL associated with internationally designated sites. The acknowledgement that land outside designated boundaries can play a critical role in supporting qualifying species is essential and reflects current Natural England guidance and case law. However, it is essential that the policy is applied robustly and precautionarily, particularly given the significant uncertainties that can remain until detailed ecological surveys are undertaken over appropriate seasons. The policy should make clear that where ecological evidence identifies land as functionally linked to internationally designated sites, avoidance should remain the primary objective in accordance with the Mitigation Hierarchy. In such cases, development proposals should be expected to demonstrate beyond reasonable scientific doubt that adverse effects on site integrity can be avoided.

KWT strongly supports the continuation and strengthening of the Strategic Access Management and Monitoring Strategies (SAMMs), including North Kent Bird Wise and East Kent Bird Wise, and welcomes the recognition that large-scale development may require additional bespoke mitigation beyond standard tariff contributions. This is particularly important given increasing recreational pressure on coastal designated sites and the cumulative impacts arising from planned growth across Canterbury District and neighbouring authorities.

KWT supports the Council's commitment to strategic wetland creation and catchment-scale mitigation measures as part of the wider Canterbury District Nutrient Mitigation Strategy. However, given the ecological sensitivity of the Stour catchment and ongoing uncertainty regarding cumulative nutrient impacts, KWT considers it essential that the policy continues to apply a precautionary approach. Strong policy wording is particularly important in this regard, as the full ecological impacts of development proposals often cannot be fully understood until detailed hydrological, ecological, and water quality evidence has been produced. Clear, unambiguous policy requirements provide certainty for applicants, decision-makers, and statutory consultees, whilst helping ensure that internationally important wildlife sites are properly protected.

KWT also welcomes the inclusion of safeguards for strategic wetlands under Part 9 of the policy. These wetlands are likely to play a critical role in delivering long-term nutrient mitigation, wider biodiversity benefits, flood attenuation, and climate resilience across the district. Their protection from prejudicial development is therefore strongly supported.

Whilst KWT strongly supports the overall direction of Policy DS20, there are areas where wording could be strengthened to provide greater certainty and consistency in decision-making. In particular, several parts of the policy rely on less definitive wording such as “may need to”, “should examine opportunities”, or “where appropriate”, which could weaken implementation where internationally important habitats are affected.

Policy DS21 – Habitats and landscapes of national importance

KWT supports the intent of Policy DS21 and welcomes the strong recognition afforded to nationally important landscapes, designated sites and irreplaceable habitats. In particular, the policy recognises the importance of nationally designated ecological sites including SSSIs, NNRs and MCZs, alongside the requirement to follow the Mitigation Hierarchy. The inclusion of specific protections for irreplaceable habitats such as ancient woodland and ancient or veteran trees is particularly important given increasing development pressures across the district. However, whilst the supporting text at paragraph 6.111 references the need for “appropriate buffers” to irreplaceable habitats, the policy itself does not define what constitutes an appropriate buffer. KWT strongly recommends that the policy wording is strengthened to include a clear minimum buffer requirement for ancient woodland and veteran trees. At present, the absence of a defined buffer leaves the policy open to interpretation and risks inconsistent application through the development management process. Clear and unambiguous wording is essential to ensure effective protection of irreplaceable habitats from indirect impacts

including lighting, noise, recreational pressure, hydrological change, air pollution and edge effects. KWT strongly recommends that the policy requires an absolute minimum 30m buffer between development and ancient woodland, with larger buffers of 50m depending on the scale, nature or potential impacts of the development, consistent with Natural England and Woodland Trust's standing advice.

Similarly, whilst Policy DS21 appropriately requires proposals affecting designated sites and protected species to follow the Mitigation Hierarchy, stronger wording should be used in places to ensure that avoidance is clearly prioritised over mitigation and compensation. In practice, compensation can rarely replace the ecological functionality, complexity and maturity of irreplaceable habitats or nationally important ecological networks.

KWT also welcomes the explicit recognition of cumulative impacts within Part 4 of the policy. This is particularly important given the scale of growth proposed across Canterbury district and the increasing pressure on designated landscapes and ecological sites arising not only from individual developments, but from the combined effects of multiple allocations, infrastructure schemes, recreational pressure and climate change. However, KWT has concerns regarding the wording that development which would materially harm nationally designated sites "will not normally be permitted." This wording introduces unnecessary ambiguity and weakens the level of protection afforded to nationally important sites. KWT strongly asserts that development which would result in material harm to the scientific or nature conservation interest, integrity or functionality of nationally designated sites, either alone or in combination with other plans or projects, should not be permitted. KWT therefore recommends stronger and more definitive wording within Part 4 of the policy to state that developments which materially harm nationally designated sites will not be permitted entirely.

Policy DS22 – Habitats, landscapes and sites of local importance

KWT welcomes the recognition afforded to habitats, landscapes and sites of local importance across the district. Collectively, LWS, Local Nature Reserves (LNR), locally designated landscapes, Green Gaps and Green Infrastructure Spaces form a critically important ecological network which supports biodiversity, landscape character, ecological connectivity, climate resilience and community wellbeing. These locally important sites and landscapes frequently provide important buffers, stepping stones and corridors between nationally and internationally designated habitats and should therefore not be viewed as being of lesser ecological importance simply because they lack statutory designation.

KWT welcomes the inclusion of protections for land secured for BNG. Securing long-term protection and management of BNG habitats will be essential if the district is to genuinely deliver measurable biodiversity improvements rather than short-term habitat creation with uncertain future management. However, KWT has concerns regarding the wording within Part 1 of the policy relating to LWS, LNR and Regionally Important Geological / Geomorphological Sites. The current wording states that development "*will only be permitted where the justification for the proposals clearly outweighs any harm*". KWT considers this wording to be overly permissive and insufficiently precautionary given the significant ecological value these sites often provide, particularly in areas where habitat fragmentation and development pressures are already severe. KWT recommends that the policy wording is strengthened to make clear that development resulting in the loss, deterioration or fragmentation LWS or LNR, either directly or indirectly, should not be permitted.

KWT also recommends that the policy explicitly references cumulative impacts in relation to locally designated ecological sites and green infrastructure assets. Whilst individual developments may appear to result in limited harm in isolation, the cumulative loss, fragmentation and degradation of locally important habitats across the district can have significant long-term consequences for ecological resilience, species movement and nature recovery ambitions.

Policy DS25 – Supporting biodiversity recovery

KWT welcomes the strong emphasis throughout Policy DS25 on integrating green and blue infrastructure, enhancing ecological connectivity and delivering measurable BNG. The policy appropriately recognises the role that green infrastructure can play not only in supporting biodiversity recovery, but also in delivering wider climate resilience, flood mitigation, health and wellbeing, and landscape benefits. In particular, KWT supports the requirement for major developments to prepare a Green and Blue Infrastructure Strategy informed by

relevant local strategies and guidance, alongside the requirement for long-term management and monitoring arrangements.

KWT also strongly supports the ambition to require 20% BNG on major developments, exceeding the national minimum requirement. This represents a positive and ambitious approach to supporting nature recovery across the district. However, given the scale of biodiversity loss nationally and locally, it will be important that this uplift delivers genuinely meaningful ecological enhancements rather than relying heavily on multifunctional infrastructure or habitats already required for other policy purposes. Whilst KWT recognises the practical benefits of allowing SuDS, tree cover and semi-natural open space provision to contribute toward the additional 10% local BNG requirement, this flexibility should not undermine the delivery of distinct and measurable biodiversity outcomes. The policy should therefore make clear that multifunctional features can only contribute where they are specifically designed, managed and evidenced to deliver substantive biodiversity value.

KWT welcomes the inclusion of requirements to retain and enhance existing ecological features, habitats of value, hedgerows and trees, alongside measures to reduce habitat fragmentation and improve ecological connectivity. These principles are critical given the fragmented nature of many habitats across the district and the increasing pressures arising from development and climate change. However, references to developments “considering opportunities” for enhancement should be strengthened to require developments to maximise opportunities for habitat enhancement, restoration and connectivity wherever feasible.

The policy’s recognition of long-term stewardship and management is particularly welcomed. KWT strongly supports the requirement for comprehensive management and maintenance plans alongside monitoring arrangements for BNG delivery. However, further clarity would be beneficial regarding enforcement and long-term accountability mechanisms to ensure habitats are successfully established, managed and retained over the required timeframe. Consideration should also be given to requiring adaptive management approaches where monitoring demonstrates that biodiversity objectives are not being achieved.

KWT also welcomes the policy requirement for developments over 300 homes to provide a minimum of 20% tree canopy cover after 30 years. This is an important commitment which will contribute toward climate resilience, urban cooling, carbon sequestration and biodiversity enhancement. However, the policy should make clear that tree planting must prioritise appropriate native and climate-resilient species and should avoid inappropriate planting in ecologically sensitive habitats such as species-rich grasslands or open habitats where tree planting is not suitable.

Whilst the policy contains a strong framework for biodiversity enhancement, KWT considers stronger safeguards are needed in relation to habitat loss. Part 5 currently states that development resulting in the loss of important trees, hedgerows or woodland “will only be granted where the need for, and benefits of, the development clearly outweigh the loss”. KWT considers this wording insufficiently protective given the importance of mature trees, woodland and hedgerows for biodiversity, connectivity and climate resilience. Stronger wording should instead make clear that loss or deterioration should be avoided and that development resulting in harm to these features should not be permitted unless it can be clearly demonstrated that impacts cannot reasonably be avoided and that no harm to the ecological function, connectivity or long-term resilience of these features would occur.

Policy DS27 – The Blean Woodland Complex

KWT strongly welcomes the inclusion of a dedicated policy for the Blean Woodland Complex and supports the recognition of the Blean as a landscape of exceptional ecological importance within Canterbury district. The policy appropriately acknowledges the significance of the wider woodland network beyond the internationally designated Blean Complex SAC and recognises the importance of restoration, connectivity and landscape-scale nature recovery. This aligns strongly with KWT’s ambitions of the Wilder Blean initiative and wider LNRS objectives to create a more resilient, connected and ecologically functional woodland landscape.

KWT particularly welcomes Part 1 of the policy which supports projects that restore, enhance, expand and connect woodland habitats, including through rewilding, natural regeneration and wider landscape restoration.

This is a positive and forward-looking approach which reflects the urgent need to address habitat fragmentation and improve ecological resilience in the face of climate change and ongoing biodiversity decline. The recognition of opportunities for natural regeneration and large-scale habitat connectivity is especially important given the fragmented nature of many woodland blocks within the Blean Complex.

However, KWT remains concerned that Part 3 of the policy refers specifically to “the Blean Complex SAC” rather than the wider “Blean Woodland Complex”. This wording creates ambiguity and risks limiting policy protection primarily to the SAC designation rather than the full network of ancient woodland, priority habitats, SSSI, NNR and LWS that collectively form the wider Blean Woodland Complex. KWT strongly recommends that this wording is amended to ensure protection applies to the entirety of the Blean Woodland Complex and is also incorporated on the Policies Map. This is essential if the policy is to effectively support nature recovery and avoid further fragmentation or deterioration of habitats outside the SAC boundary, but which remain functionally and ecologically important.

KWT also welcomes Part 5 of the policy requiring development on surrounding land, including Broad Oak Reservoir, to avoid adverse impacts on the landscape, ecology and setting of the Blean Woodland Complex. Given the scale of proposed development pressures in the surrounding area, this provision is particularly important. However, KWT considers the wording could be strengthened further to ensure developments are required not only to avoid harm, but to actively contribute toward habitat connectivity, buffering, restoration and long-term ecological resilience of the Blean Woodland Complex.

Policy DS27 would also benefit from more explicit reference to the importance of buffering and connecting fragmented woodland blocks, including through the retention and enhancement of hedgerows, species-rich grasslands, wetland habitats and river corridors which support ecological connectivity across the wider landscape. Protecting and restoring land surrounding the core woodland areas will be critical to reducing edge effects, improving species movement and supporting climate adaptation over the lifetime of the Local Plan.

KWT strongly supports the policy’s alignment with the Kent and Medway Local Nature Recovery Strategy. The Blean Woodland Complex represents one of the most significant opportunities for landscape-scale nature recovery in Kent and the policy provides an important framework for ensuring future development contributes positively toward these ambitions rather than undermining them through incremental habitat loss, recreational pressure or fragmentation.

Overall, KWT welcomes the opportunity to comment on Canterbury City Council’s Draft Local Plan Regulation 19 consultation. We recognise the considerable work undertaken by the Council to revise the Plan, respond to earlier consultation feedback, strengthen elements of the evidence base, and improve recognition of biodiversity, green infrastructure and ecological connectivity throughout a number of draft policies. In particular, KWT welcomes the removal of certain environmentally constrained allocations, including the former Policy C12 – Land north of the University of Kent, alongside the increased acknowledgement throughout the Plan of the importance of landscape-scale nature recovery and the protection of internationally and nationally designated wildlife sites.

That said, whilst there are many positive changes within the draft Plan, KWT remains concerned that several allocations and policies still rely too heavily on future assessment, mitigation and masterplanning processes without sufficient certainty that significant ecological harm can be avoided. At this stage, the absence of detailed ecological survey data, updated species evidence, hydrological assessments and cumulative impact analysis means that the full scale of environmental impacts associated with a number of allocations cannot yet be fully understood. This is particularly important in relation to internationally designated sites, ancient woodland, FLL, priority habitats and species, and wider ecological connectivity networks across the district.

KWT therefore emphasises the importance of ensuring that the Local Plan itself contains strong, precise and unambiguous policy wording. Clear requirements, such as defined minimum ancient woodland buffers, explicit protections for FLL, long-term ecological management requirements, restrictions on lighting and hydrological impacts, and mandatory strategic green and blue infrastructure delivery, are essential to ensure that ecological safeguards are consistently applied and enforceable throughout the lifetime of the Plan.

It should also be noted that, whilst KWT has provided comments on a number of key draft policies and site allocations, the absence of comments on every policy should not be interpreted as full endorsement or agreement with those policies. Equally, where KWT has expressed support in principle for aspects of site allocations or policy approaches, this does not indicate automatic support for future development proposals. Should planning applications and accompanying ecological evidence demonstrate unacceptable harm to biodiversity, designated sites, ancient woodland, protected species, ecological connectivity or the wider natural environment, KWT would continue to raise objections as appropriate in line with national policy, environmental legislation and our organisational objectives.

Looking ahead, we encourage Canterbury City Council to continue working collaboratively with conservation organisations, statutory consultees, local communities and other stakeholders to ensure that the final Local Plan delivers genuinely nature-positive development and long-term environmental resilience. By embedding robust ecological safeguards and prioritising landscape-scale nature recovery throughout the Plan, the Council has an important opportunity to demonstrate leadership in addressing the biodiversity and climate crises whilst supporting sustainable communities and a resilient local economy. KWT remains committed to supporting the Council through this process and welcomes continued engagement to help ensure that the final Local Plan reflects both national planning requirements and the ecological importance of Canterbury district's unique landscapes, habitats and species.

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

Emma Waller

Senior Planning and Policy Officer
Kent Wildlife Trust



Kent
Wildlife Trust