



University of Kent Land Disposal Plan: Recreational Pressure on Blean Woods

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BACKGROUND

WSP has been commissioned by the University of Kent (UoK) to provide transport and environmental advice for the development of proposals at various sites in and around their Canterbury Campus.

Land to the north of the University Campus (referred to as Sites BCD) has been identified for a residential led development with local centre accommodating up to 2000 homes. Further land parcels within and adjacent to the retained main campus (Sites A, B, C, D, E and F), alongside land proposed for an access road (the 'Access Road Site') and a disused railway line (formerly the Crab and Winkle Railway Line) have been referred to within this note as the 'Proposed Disposal Sites'.

The UoK is located to the north of Canterbury city centre, Kent (approximate grid reference: TR130602). Indicative boundaries of the Proposed Disposal Sites are shown in Figure 1. They total approximately 137.20 ha, and are made up of urban residential areas, scattered trees/ornamental planting, agricultural fields and woodland, including ancient woodland.

REQUIREMENT FOR RECREATIONAL GREENSPACE CREATION

Consultation with the local authority and Natural England has identified the potential for increased recreational pressure on woodland as a likely impact of the Proposed Development should the disposal sites be proposed for allocation within the new Local Plan. The Proposed Development lies with an area supporting a wide variety of statutory sites designated for the protection of woodland, comprising: Blean Complex Special Area of Conservation (SAC); Church Woods, Blean Site of Special Scientific Interest (SSSI), Ellenden Wood SSSI, West Blean and Thorndon Woods SSSI, Blean Woods National Nature Reserve and Tyler Hill Meadow LNR. Further woodland is located outside these statutory designated sites, identified on the Ancient Woodland Inventory¹, Priority Habitat Inventory², or as non-statutory designated Local Wildlife Sites (LWS).

Increased recreational pressure on designated sites has, in the past two decades, become a concern for authorities charged with their protection. Led by protection policies surrounding Thames Basin Heaths Special Protection Area (SPA) introduced in the mid-2000s, notable sites in southern England where recreational pressure is controlled through the planning system also now also include Epping Forest SAC within Essex and Greater London, Canford Heath SPA in Dorset, designated wildlife protection sites at Dawlish Warren/Exe Estuary in Devon and protected sites along the Essex coastline.

¹ <https://naturalengland-defra.opendata.arcgis.com/datasets/ancient-woodland-england> - The ancient woodland inventory in England lists areas over two hectares in size which have been continuously wooded since at least 1600.

² <https://naturalengland-defra.opendata.arcgis.com/datasets/39403df11c8044d998772db5b54ad86c>

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WOODLAND DESIGNATED SITES

WSP completed a Preliminary Ecological Appraisal (PEA) of the Proposed Development in March 2021. The PEA was undertaken to provide baseline ecological information, provide recommendations to enable compliance with relevant nature conservation legislation and planning policy and identify the need for avoidance, mitigation, compensation or enhancement measures and/or further ecological surveys.

The PEA identified the following woodland designated sites within the area surrounding the Proposed Development, the locations and extents of which are shown on Figure 2:

- Blean Complex SAC - 278m west of where the access road has been proposed at its closest point.
- Church Woods, Blean SSSI - directly adjacent to Site F at its closest point.
- Ellenden Wood SSSI - 1.89 km northwest of Site C.
- West Blean and Thorndon Woods SSSI - directly adjacent to Site F at its closest point.
- Blean Woods NNR - 200m west of Site B at its closest point.
- Tyler Hill Meadow LNR - north across the Tyler Hill Road (6m) from the Dismantled Railway Site.
- Little Hall and Kemberland Woods and Pasture (CA18) - Adjacent to Site F.
- Blean Woods, Harbledown to Dunkirk (CA34) - 650m west of the Access Corridor.
- Clowes Wood and Marley Wood (CA16) - 700m north of Site D.

Several sites overlap with each other, or fully encompass one another. Some support ancient woodland listed on the Ancient Woodland Inventory, and all deciduous woodland is considered a Habitat of Principal Importance (HPI)³.

RECREATIONAL GREENSPACE WITHIN THE EXISTING MASTERPLAN

Development of the disposal sites would lead to creation of demand for recreational spaces by residents. The Concept Masterplan (Appendix A) for development of disposal sites B, C and D has purposefully created an environment where recreational greenspace is in abundance on the resident's doorstep, offsetting the need for them to travel to access natural spaces in the wider environment. Public footpaths crossing these disposal sites will be retained/diverted and augmented by new paths and walking routes, alongside community gardens, a new recreation ground in Disposal Site C, woodland planting and play areas.

The provision of these recreational amenities will be attractive to residents and act to ameliorate recreational pressure on woodland areas, including Blean Complex SAC and other designated sites. Should residents choose, they will be able to access these sites through longer walks as paths will be connected to the wider area. However, the number of residents choosing to do this regularly is expected to be small.

³ HPI are listed under Section 41 of the NERC Act 2006 and are Material Consideration in the planning process.

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SUITABLE ALTERNATIVE NATURAL GREENSPACE: REQUIREMENTS AND CRITERIA

If provision of specific measures are required outside the existing Concept Masterplan to offset the effects of increased recreational pressure, they are typically mitigated through the provision of Suitable Alternative Natural Greenspace, or SANG. Provision of SANG is aimed at users such as dog walkers and families with children, who need to travel to reach suitable recreational greenspace. They use sites frequently but for short periods of time and do not go far from their method of access (i.e. a car park, bus stop etc). SANGs are designed to be more attractive than the designated sites under pressure to the target users, and do not need to achieve high levels of biodiversity value, remaining more amenity in nature, although enhancements for biodiversity are also typically favoured in SANG design. Canford Park SANG in the Borough of Poole was created to offset pressure on Camford Heath SPA, and is an example of a popular SANG that incorporates various elements to attract users⁴.

Guidance for the provision of SANGs in England generally follows that first issued by Natural England to protect the Thames Basin Heaths SPA, although this guidance has been revised since its first release and variation in implementation occurs between different local authorities⁵. The fundamental principles of SANG creation are that SANGs may be created from:

- Existing open space of SANG quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public.
- Existing open space which is already accessible, but which could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit the SPA.
- Land in other uses which could be converted into SANG.

Detailed guidance for SANG creation is split into three areas: “must haves”, “should haves” and “desirables”. The guidance clarifies that these terms are precise, specifically that, *“requirements referred to as “must” are essential in all SANGs. Those requirements listed as “should haves” should all be represented within the suite of SANGs, but do not all have to be represented in every site. All SANGs should have at least one of the features on the “desirable” list*”. SANG features under these categories are:

MUST HAVES

- For all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance (400m) of the developments linked to it.
- It should include a circular walk of 2.3-2.5km around the SANGs. On sites with car parks this should start and finish there.
- Sites of 10ha or more must have adequate car parking. These should be clearly signposted and easily accessed.
- Car parks must be easily and safely accessible by car and should be clearly sign posted.
- The accessibility of the site must include access points appropriate for the particular visitor use the SANGs is intended to cater for.

⁴ <http://www.canfordparksang.co.uk/>

⁵ See <https://www.surreyheath.gov.uk/sites/default/files/2023-05/Thames%20Basin%20Heaths%20Special%20Protection%20Area%20SPD%202019.pdf>

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- The SANGs must have a safe route of access on foot from the nearest car park and/or footpath/s.
- SANGs must be designed so that they are perceived to be safe by users; they must not have tree and scrub cover along parts of the walking routes.
- Paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming too urban in feel.
- SANGs must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.
- All SANGs larger than 12 ha must aim to provide a variety of habitats for users to experience. Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.
- SANGs must be free from unpleasant intrusions (e.g. sewage treatment works smells etc).

SHOULD HAVES

- SANGs should be clearly sign-posted or advertised in some way.
- SANGs should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.
- SANGs should link into longer walks of 5km or more through footpath or other green networks.

DESIRABLES

- It would be desirable for an owner to be able to take dogs from the car park to the SANGs safely off the lead.
- Where possible it is desirable to choose sites with a gently undulating topography for SANGs.
- It is desirable for access points to have signage outlining the layout of the SANGs and the routes available to visitors.
- It is desirable that SANGs provide a natural space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable.
- Where possible it is desirable to have a focal point such as a view point, monument etc within the SANGs.
- Larger SANGs or those grouped close together should aim to provide longer walks of 5km or more.
- Design and management of the SANGs should contribute to relevant Biodiversity Opportunity Area Priority habitat restoration/creation objectives, where appropriate.

SCREENING OF DISPOSAL SITES FOR SANG SUITABILITY

Each of the disposal sites earmarked as being for habitat enhancement or creation (A, E and F) have been screened against the criteria outlined above to determine whether it could act as a SANG. Disposal sites have been considered suitable where all the Must Have and Should Have criteria are met, and where one or more Desirable criteria is met. It should be noted that the dismantled railway has not been screened as it will provide a cycling route, thus has already been assigned a function and could not double as a SANG. Remaining disposal sites are earmarked for housing and are therefore cannot function as a SANG. The results of the screening assessment are shown in Table 1.

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Table 1 – Screening of disposal sites against SANG criteria.

Disposal Site	Size (ha)	Must Haves	Should Haves	Desirables	Discussion	Suitable as SANG?
A	5.35	Size: Larger than 4ha. Parking: Could be provided off north side of University Road outside the disposal site. Unlikely to be provided within the disposal site as woodland forms the boundary between it and University Road. Accessibility: Potential for safe accessible entrance routes from University Road Circular Walk: Maximum circular walk distance ~800m around the SANG perimeter. Not possible to incorporate a 2.3-2.5km walking route. Safety: Some woodland but majority open space with existing footpaths and public access. Considered safe. Path construction: Existing unsurfaced footpaths. Further unsurfaced footpaths could be provided.	Clear signposting: Achievable Leaflets/website advertising SANG: Achievable Links to longer walks of 5km or more: Further footpaths link to site through university land but a 5km walk that does not intersect with developed areas around Canterbury or the University Campus is not possible.	Possible to let dog off lead from car park: No, dogs would likely need to be on lead from parking provided north of University Road and led into the SANG. Gently undulating topography: Yes. Signage for walking routes: Achievable. Landscape type: Mostly open grassland with scattered trees, and some woodland is present. Focal point: None. Longer walks possible: No, the site is too small to contain a 5km or longer walk. Within Biodiversity Opportunity Area: No.	Overall, this disposal site forms an existing piece of public open space with footpaths and access routes across it, rather than providing new greenspace that could offset recreational effects. It is also small and does not meet the required criteria for a 2.3-2.5km circular walk. Provision of car parking north of University Road would limit the ability of dog walkers to let their dogs off lead. The site does not meet all the Must Have and Should Have criteria and therefore is not suitable as a SANG.	No

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Disposal Site	Size (ha)	Must Haves	Should Haves	Desirables	Discussion	Suitable as SANG?
		Habitats: Woodland, open grassland. Dogs: Possible to let dogs off lead but University Road presents a hazard. Intrusions: Between developed areas of Canterbury and university campus.				
E	7.98	Parking: New car park can be provided off of St Stephens Hill, or through conversion of buildings in north-east of site to a new car park Accessibility: Site is relatively flat arable land and accessible routes from the car park around the site could be created. Circular Walk: Maximum circular walk distance ~1km around the SANG perimeter. Not possible to incorporate a 2.3-2.5km walking route. Safety: Currently no tree cover or water bodies within site. Considered safe. Path construction: Unsurfaced footpaths would be	Clear signposting: Achievable Leaflets/website advertising SANG: Achievable Links to longer walks of 5km or more: Yes, access to footpaths through Little Hall Wood via farm track to the east and to footpaths north of the university campus to the west.	Possible to let dog off lead from car park: Yes, car park would be contained within SANG and bounded by hedges, which could be altered to contain free-running dogs. Gently undulating topography: Yes Signage for walking routes: Achievable. Landscape type: Currently arable land with some scrub and buildings. However, no barriers to it being landscaped to an attractive public open space. Focal point: None.	This disposal site is not suitable as a SANG as it is too small, not being able to meet the minimum length of circular walk in the Must Have criteria. However, it passes all other Must Have and Should Have criteria, and several desirable criteria.	No

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Disposal Site	Size (ha)	Must Haves	Should Haves	Desirables	Discussion	Suitable as SANG?
		created. There are currently no footpaths on the site. Habitats: Currently arable land with some scrub and buildings. However, no barriers to it being landscaped to an attractive public open space. Dogs: Dogs can be let off lead. Site is surrounded by hedgerows which could enhanced to contain free running dogs. Intrusions: None, semi-rural environment on the edge of Canterbury.		Longer walks possible: No, the site is too small to contain a 5km or longer walk. Within Biodiversity Opportunity Area: No.		
F	18.16	Parking: New car park can be provided off farm track (which may require upgrading and potentially sealing) to the north-west of the disposal site. Accessibility: Site is relatively flat grassland and accessible routes from the car park around the site could be created. Existing public footpaths are present that could be upgraded.	Clear signposting: Achievable Leaflets/website advertising SANG: Achievable Links to longer walks of 5km or more: Yes, access to footpaths through Little Hall Wood, Barton Wood and Brickhouse Wood via public footpaths already present.	Possible to let dog off lead from car park: Yes, car park would be contained within SANG and bounded by hedges, which could be altered to contain free-running dogs. Gently undulating topography: Yes. Signage for walking routes: Achievable. Landscape type: Currently open pastoral grassland with	This disposal site meets the Must Have and Should Have criteria for a SANG, and several of the desirable criteria. It is therefore suitable as a SANG. However, it should be noted that creation of a car park within Site F would require access via a farm track that connects to St Stephens Hill. In addition, landscaping and upgrading of boundary	Yes

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Disposal Site	Size (ha)	Must Haves	Should Haves	Desirables	Discussion	Suitable as SANG?
		Circular Walk: Circular walk of 2.3km can be accommodated within the disposal site. Safety: Currently no tree cover or water bodies within site. Considered safe. Path construction: Unsurfaced footpaths would be created to augment existing footpaths on site. Habitats: Currently open pastoral grassland with some individual trees. However, no barriers to it being landscaped to a more interesting public open space. Dogs: Dogs can be let off lead. Site is surrounded by hedgerows which could enhanced to contain free running dogs. Intrusions: None, semi-rural environment on the edge of Canterbury.		some individual trees. However, no barriers to it being landscaped to a more interesting public open space. Focal point: No. Longer walks possible: No, the site is too small to contain a 5km or longer walk. Within Biodiversity Opportunity Area: No.	hedgerows to contain free running dogs should be undertaken to develop it.	

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DISCUSSION

The concept masterplan for Disposal Sites B, C and D (Appendix A) offers ample, local greenspace with links to walks through the wider area that would function to provide recreational greenspace. The masterplan proposals enhance the existing arable farmland landscape with habitat creation and provide new public footpaths for recreational users. However, in a scenario that the local planning authority, as advised by Natural England, requires creation of a SANG specifically in addition to greenspace within the masterplan, options exist within the disposal sites for this.

Proposed Disposal Site F is the only disposal site earmarked for habitat enhancement or creation that is suitable as a SANG, assuming a car park and access could be created from St Stephens Hill allowing the public to reach it. Site E meets all the Must Have and Should Have criteria required for a SANG apart from that it is too small, not being able to contain the minimum size of circular walk. Site A does not meet several of the Must Have criteria and is overall not suitable, it being an already publicly accessible piece of open space.

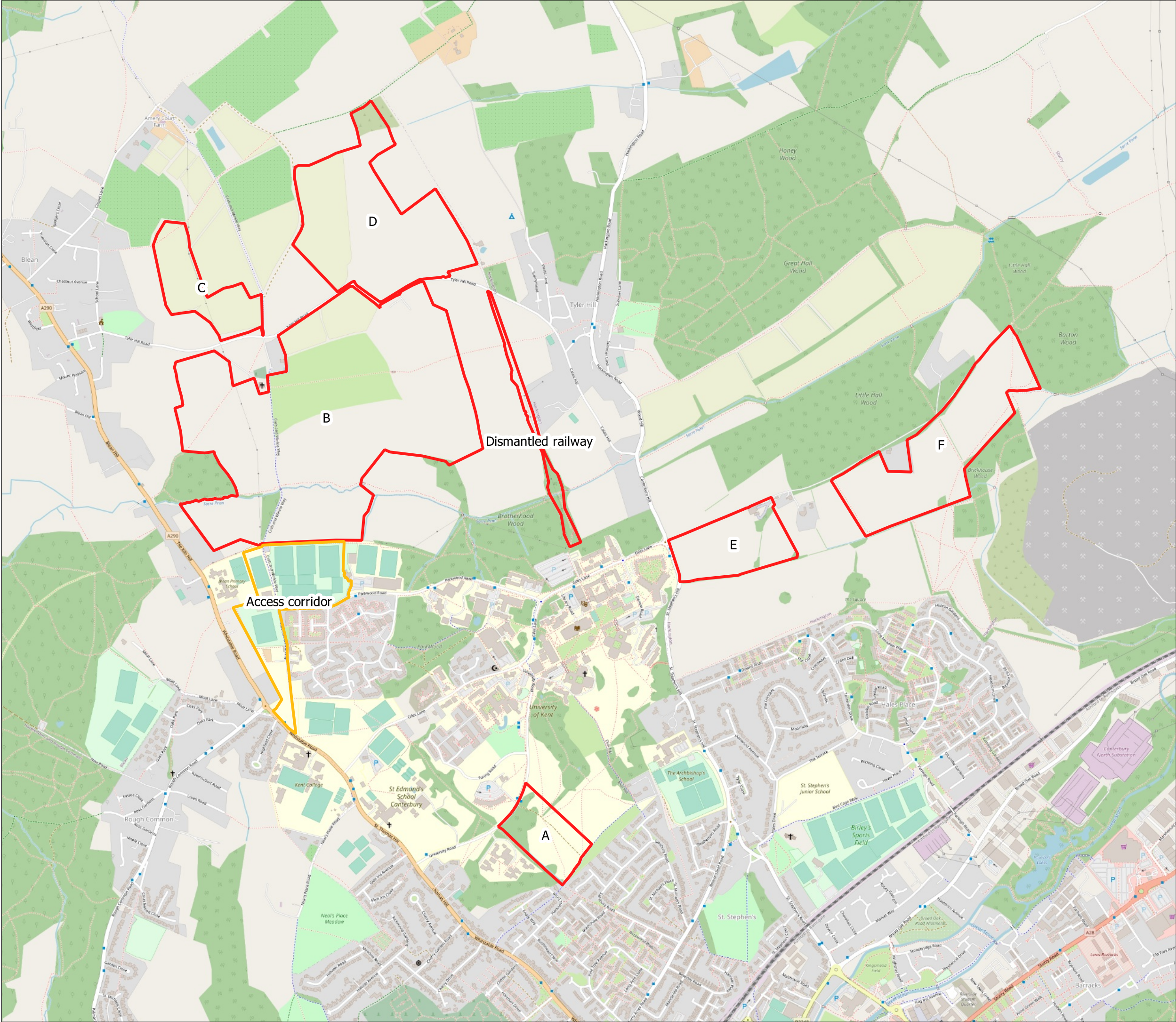
Guidance allows for SANG provision amongst multiple sites and it may be desirable to create a SANG encompassing Sites E and F together, with Site E housing the car park and linked, via the farm track (noting it is a public right of way) along the southern boundary of Little Hall Wood, to Site F. In this way, access to Site F would be provided via Site E and several lengths of circular walk provided between both sites. It is not clear at this stage if this solution is possible given the requirement of the track to provide access for adjacent properties but should be explored.

Sites A, E and F may be considered as areas to provide habitat creation and enhancement to satisfy Biodiversity Net Gain (BNG) requirements under the Environment Act 2021 associated with disposal of Sites B, C and D and the Access Road Site. Natural England recently clarified that SANGs can only be considered as contributing to BNG where habitats provided are over and above that required to deliver the SANG itself⁵. Therefore, landscaping of agricultural land into an attractive open space for recreation (as would be required for Sites E and F) would not contribute towards BNG, but addition of important habitats over and above this could contribute to BNG. Provision of a conglomerate SANG between Sites E and F would allow enough space to provide a recreational area and also biodiversity enhancements away from this (and therefore disturbance by users of the SANG) that could contribute to BNG. This may be more difficult to achieve by developing the two sites separately, one for BNG and one as a SANG.

Overall it is considered that the proposed allocation sites B,C,D have an appropriate strategy for the mitigation of any recreational impacts arising. Discussion with Natural England will form part of the development of the masterplan in due course and this strategy can be discussed at an appropriate time.

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Figure 1 – Disposal Site Locations



LEGEND:

Disposal Sites

Access corridor

STATUS:

FOR INFORMATION ONLY



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CLIENT:

University of Kent

PROJECT:

Disposal Sites

TITLE:

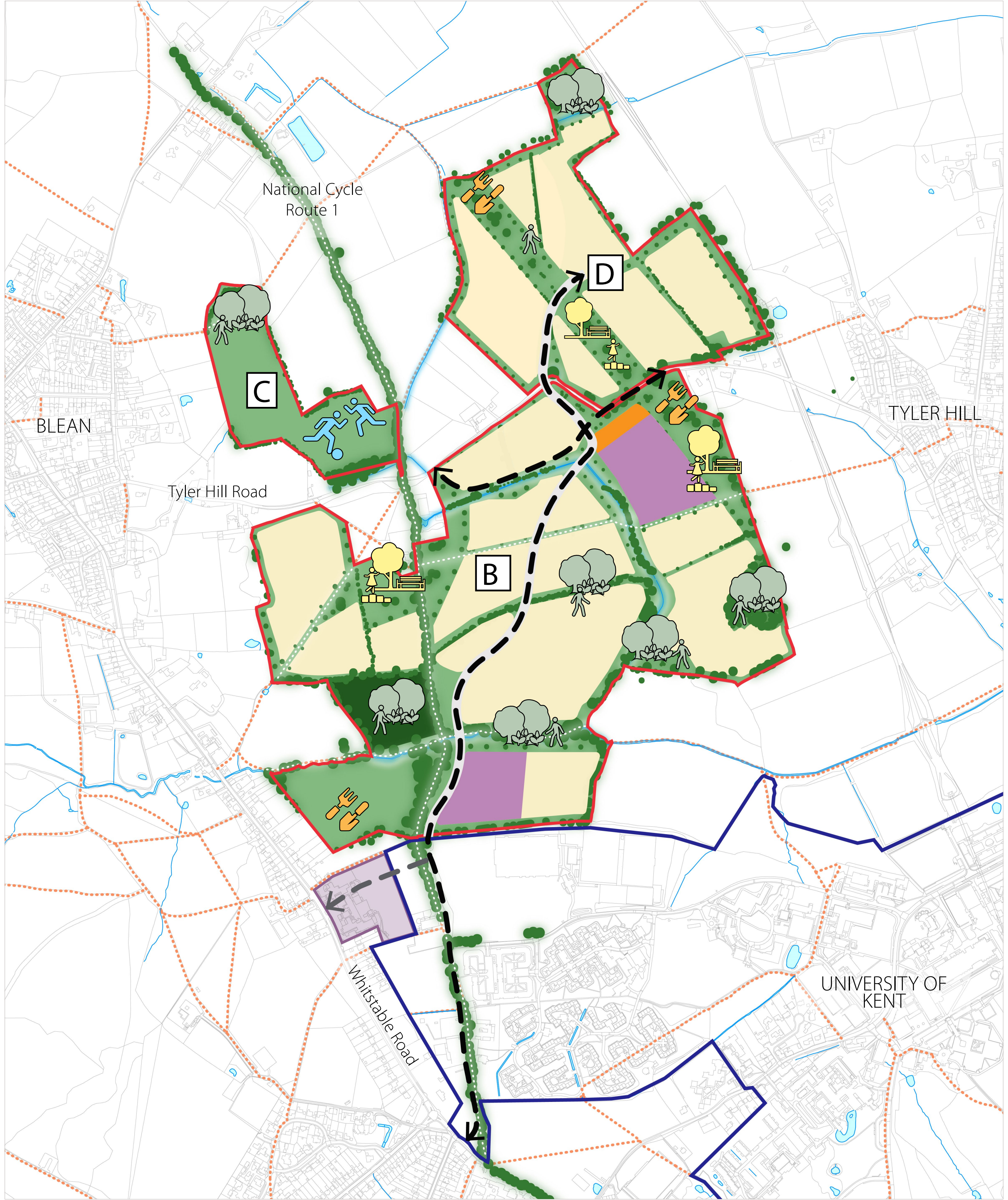
Location of Diposal Sites

SCALE @A3:	DRAWN:	APPROVED:
1:20,000	PJ	MM
VERSION:	DATE:	DATE:
1	14/11/23	14/11/23
PROJECT No:	DRAWING No:	
70080896	Figure 1	



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Appendix A – Concept Masterplan



Key

- Site boundary

Site ownership boundary

Public Rights of Way

Primary Access Route

Illustrative Secondary Access

Developable land parcels
- Trees and hedgerows

Existing tree planting and mitigation area

Green, open space providing amenity space, natural and semi natural open space, green corridors, parks, play and allotments

Outdoor sport facilities

Amenity parks and play facilities
- Natural and Semi natural open space

Allotments

Potential new Primary School location
NOTE: Size of site for relocated school is TBC (and will be dependent on the size of the school(s) ultimately delivered). At this stage, noting KCC's requirements, we envisage a school site of up to 3 Ha being delivered within the masterplan – the shape/design of which will be subject to discussions with KCC moving forward.
- Potential new Local Centre location

Existing school location