



Date: 9th August 2021

To: planning@canterbury.gov.uk (by email only)

Dear Madam/Sir,

RE: Canterbury Local Plan - preferred options consultation.

Many thanks for consulting Kent Wildlife Trust on the above consultation. We have reviewed the consultation documents online and have provided our comments and recommendations below.

On the basis that our comments will be within our remit of nature conservation it is not deemed appropriate to provide answers to all of the questions posed by the survey. Instead, we have provided overarching comments and answers to specific questions where appropriate, predominantly within section seven - historic and natural environment.

Section one – Draft Vision and Growth Options

Draft vision for the district:

The draft vision does not include a dedicated paragraph for nature conservation and its benefits for biodiversity, climate and for resident's health and wellbeing. The Kent Nature Partnership's Kent Biodiversity Strategy opens by stating that *"Nature is remarkable and is essential to our lives. It is responsible for the air we breathe, the water we drink, the soil we live on (and off) and the food we eat. It provides us with clothes to wear, materials to build with and medicines to cure. It provides us with a place for leisure, recreation and reflection and provides great joy and interest; as such it is inextricably linked to our mental health and wellbeing."* The great importance of the environment for sustaining us is further recognised by the 25 Year Environment Plan which states that protecting nature is *"critical if the next generation is to flourish, with abundant natural resources to draw on"*. As such, it is essential that the vision of the Plan aligns with these regional and national strategies and clearly sets out Canterbury's vision for and commitment to the environment. At present we do not feel that this is being achieved. In addition to the inclusion of a dedicated paragraph for nature conservation, there are a number of key opportunities to include the benefits of biodiversity within the current paragraphs of the vision.

We make the following comments and recommendations:

- Include a dedicated paragraph on tackling the nature and climate crisis to create healthy ecosystems and support the health and wellbeing of residents. This vision should clearly set out that the Plan aims to ensure that it leaves the environment in a significantly better state than before.
- We are supportive of the inclusion of improved biodiversity for "growth centred on Canterbury", recognising the importance of biodiversity for quality of life. This includes both mental and physical health and wellbeing. There is further opportunity to highlight the importance of biodiversity for resident's health and wellbeing under "healthy communities".
- We believe that there should be a focus on incorporating biodiversity enhancements into walking and cycling routes to ensure that everyone has access to nature in their day to day lives.
- There is no mention of nature conservation within the 'improved connectivity' paragraph. Research with Wildlife Trust volunteers showed that 95% of participants with low wellbeing at the start of a volunteering programme reported an improvement in 6 weeks. This highlights the importance of connecting people with nature which is not reflected within the draft vision.

Draft strategic objectives:

We wish to make the following comments and recommendations on the draft strategic objectives:

- We would expect bullet point 2 to include a requirement for biodiversity to be considered from the outset and be integral to development planning.
- We would advise that this Plan should seek to explore and promote opportunities for the economy and tourism through emerging sustainable ecotourism opportunities. Canterbury is set to be the first district in the UK to have Bison reintroduced to its woodlands. Along with previous beaver reintroductions and Canterbury's diverse wildlife there is opportunity to promote these flagship projects and to connect residents and visitors with our precious wildlife.
- To ensure that the Plan aligns fully with national and regional policies and strategies we suggest that the second to last bullet sets an objective to leave the environment in a measurably better state than it was at the beginning of the plan period.
- We advise that the final bullet should be expanded to include the benefits of carbon sequestration and keeping carbon locked up in existing habitats, alongside the existing focus on carbon reduction measures.

Growth options - preferred option:

Whilst we do not have any immediate concerns about focusing future development around the city of Canterbury, we do wish to raise concerns regarding the associated A28 upgrades to allow traffic to bypass the city centre. The indicative car routes are likely to negatively impact upon wildlife sites of local, national and international importance. At this stage we advise that transport routes are designed to avoid adverse impacts to designated sites, including to Chequer's Wood and Old Park Site of Special Scientific Interest (SSSI), Church Woods Blean SSSI, Blean Complex Special Area of Conservation (SAC), Great Stour Local Wildlife Site (LWS) and Stodmarsh SSSI, SAC and SPA.

Section two – Town Centre Strategies

We wish to provide overarching comments on the town centre strategies set out by this Plan which cover the Plan's strategies for Canterbury, Herne Bay and Whitstable. There is unfortunately a lack of reference to urban wildlife and tackling the nature and climate crisis. We would argue that the list of major challenges faces by urban areas includes a lack of biodiversity, a disconnect between residents and visitors and wildlife, insufficient access to natural green space and lack of suitable climate mitigation and adaptation measures. Many of these issues can be addressed through a strategic green infrastructure strategy, including the retrofitting of green infrastructure. We would expect such a vital strategy to be referenced within the town centre strategies, including within their vision and objectives. At present there is very limited reference to biodiversity within this section.

Section three – Housing and New Communities

We are supportive of the inclusion of the importance of access to wildlife sites for new residents. In addition to the benefits of connecting residents to wildlife, we also feel that this section should promote the importance of new housing, resulting in a measurable net gain for biodiversity. Biodiversity net gain (BNG) should be considered from the outset of all development projects and we urge the Council to consider BNG requirements for each of their site allocations, accounting for local and national strategies, including contributing to the delivery of a nature recovery network.

Section seven – Historic and Natural Environment

Climate Change Mitigation

Kent Wildlife Trust supports Option NE2 to achieve reduced carbon emissions and increased energy efficiency and proposes that new guidance to adapt and retrofit buildings should not be limited to the historic environment but across the entire built environment (existing homes, commercial space, essential infrastructure – hospitals, schools etc). In parallel with new guidance, incentives (free/discounted advice, discounted building materials, tax relief where appropriate) could be offered to fast-track energy efficiency improvements. To ensure support is effectively distributed, support could be phased so the least efficient buildings with the greatest carbon footprint are eligible for more support.

Climate change mitigation is mentioned sporadically throughout local plan sections. Canterbury City Council should look to develop a Climate Change Strategy and Action Plan. In assessing the carbon emissions of the district, this plan must account for decisions taken by the council, including planning decisions, and on their impact to climate change. Clear policies and principles should seek to reduce emissions and increase absorption.

Local Nature Recovery Strategy and Biodiversity Net Gain

Canterbury City Council is recognising the equal importance of blue and green infrastructure in supporting wildlife and a diversity of habitats, however there is little recognition of the need to move towards a landscape scale approach to biodiversity. In line with the upcoming Environment Bill, a Local Nature Recovery Strategy should be created and included in Canterbury's Local Plan to identify habitats which already exist and identify opportunity areas where action needs to be taken so nature can recover. This is reflected in NPPF 179;

To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

Kent Wildlife Trust is pleased to see Canterbury's proposal of a 20% net gain in biodiversity required from new development as outlined in Option NE3C. Kent Wildlife Trust is currently working as part of the Kent Nature Partnership (KNP). The KNP is developing a countywide strategic approach to Biodiversity Net Gain and Local Nature Recovery Strategies, in anticipation of the requirements of the Environment Bill. As part of these strategies, we are promoting a countywide commitment to delivering 20% measurable biodiversity net gain and commitments that any offsite biodiversity net gain is delivered strategically in order to meet the priorities and targets of existing and future landscape scale biodiversity strategies. In aligning with these principles, a BNG policy should:

1. Specify of a minimum percentage, preferably 20%, but a minimum of 10% in accordance with future legislation
2. Provide detail on how this percentage should be measured, using the most up to date version of the Defra Biodiversity Metric
3. Specify how developers should present their calculations and details of how on and offsite compensation and net gain will be delivered

4. Require that on and offsite net gain should be delivered at location that meets strategic landscape scale priorities, including specific reference to future Local Nature Recovery Strategies
5. Specify that BNG provision should follow the mitigation hierarchy, providing offsite compensation where avoidance, mitigation and onsite compensation are not feasible or ecologically meaningful
6. Specify that offsite BNG should be provided if it cannot be meaningfully provided onsite in a way that contributes to meeting local landscape scale biodiversity priorities
7. A commitment to produce a Supplementary Planning Document that will provide further details on how developers should deliver biodiversity net gain in future
8. Commit to providing net gains for biodiversity in perpetuity

The inclusion of a policy requiring 20% net gain would be consistent with the approach being taken by other Local Authorities currently undertaking Local Plan reviews in Kent. We would be happy to enter into further discussions with Canterbury City Council to ensure that biodiversity net gain policy and supplementary planning document aligns with emerging Kent Nature Partnership Strategy.

Kent Wildlife Trust is not entirely opposed to Option NE5B however any areas suited to community development should be prioritised through a Local Nature Recovery Strategy; in addition to meeting the minimum 20% biodiversity net gain requirement. Kent Wildlife Trust strongly urges Canterbury City Council to include community participation and stewardship at the centre of all community focused, open space development. Daily contact with nature is linked to better health, reduced levels of chronic stress, reductions in obesity and improved concentration. The provision of high quality green infrastructure, access to nature and ownership of local green spaces should be at the heart of creating vibrant communities. A [recent report](#) revealed that prescribing contact with nature for people who have low levels of mental wellbeing is excellent value for money for improving their health and wellbeing. The report, which is based on three years of research found that people participating in both sorts of outdoor nature conservation activities felt significantly better, both emotionally and physically, as a result. They needed, for example, fewer visits to GPs or felt more able to get back into work. On this basis, conservation of and promotion of access to nature should be included as cross cutting issues throughout the Local Plan. We also encourage the council to explore social prescribing of nature-based interventions.

Protecting and enhancing Green Gaps and Open Spaces

Kent Wildlife opposes NE5T and would think Canterbury City Council should actively pursue Option NE5S, continuously identifying new green gaps to maintain and safeguard the 'green' landscape corridors. Green gaps and open green spaces could be utilised for offsite BNG and NN projects, enhancing habits and becoming the foundation for a district-scale local nature recovery network, recognising their importance as steppingstones connecting the extensive designated sites present across the district.

Kent Wildlife Trust encourages Canterbury City Council to continue protecting existing open space whilst establishing new multifunctional green spaces which benefit both people and wildlife. Where appropriate, combining recreational areas with wildlife conservation will allow people to connect with nature on a day to day basis. The benefits of this are outlined in our response to Option NE5B.

Dark Skies

Kent Wildlife Trust supports Option NE6B, taking a more proactive approach to protect dark skies. In addition to the landscape character and tranquility reasons given; dark skies are essential to the proper functioning of natural ecosystems. Light pollution can detrimentally affect hunting, feeding,

breeding and navigation (particularly during migration) of many organisms including terrestrial and aquatic species, birds, insects and flora (IUCN Dark Skies Advisory Group, 2021)

Coastal Protection and Overtopping

Kent Wildlife Trust oppose NE10 due to the increased disturbance and pressures (from construction, operation, recreation) within hazards zones are very likely to impact biodiversity as well as the geological structure. Typically, hazard zones are relatively undisturbed and are likely to allow locally present flora and fauna to flourish. Nature's recovery is not limited to terrestrial ecosystems, aquatic and marine systems are equally as important. Coastal protection and overtopping hazard zones could be included within Canterbury's Local Nature Recovery Network providing the stepping stone between terrestrial and marine ecosystems.

We hope that the comments made within this letter prove useful in the updating of the Canterbury's Local Plan. We would be more than happy to hold further discussions with you on any of the issues raised.

Yours faithfully,

Megan Angus

Wilder Towns Officer

Kent Wildlife Trust

