



## **Canterbury City Council Local Plan**

### **Preferred Options Consultation**

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**Representations on behalf of Camilla Swire**

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**Our ref: CN 197182**

7<sup>th</sup> August 2021

Strutt and Parker are instructed by Camilla Swire of [REDACTED] to respond to the Preferred Options consultation published by Canterbury City Council in July 2021.

Our clients' general concerns cover the following topics:

- Support for improved biodiversity;
- Protection of greenfield sites;
- Prevention of urban sprawl;
- Priority for development on brownfield sites;
- Stricter environmental standards for new housing and requirements for existing housing stock to be adapted;
- Flexibility of design of student accommodation to provide housing for younger citizens;
- Encouragement for low carbon methods of travel (walking, cycling, public transport);
- Implementing Kent County Council's Net Zero Action Plan.

A number of these themes are developed in this representation.

### **Climate Emergency**

- 1.1. Our client strongly supports Canterbury City Council's declaration of a climate emergency.
- 1.2. To be credible in its commitments, it is essential that the new Local Plan places the need for district-wide sustainability and resilience at the heart of its policy-making.
- 1.3. The implications of the climate emergency are far-reaching. The Council as a corporate body takes many decisions every day. The decisions with the most far-reaching consequences are those which relate to the use of land and buildings, and how they are managed. The Local Plan which sets the legal basis for such decisions therefore has a crucial role to play.
- 1.4. It is important therefore that the highest environmental standards are achieved in all new development. Furthermore, the opportunity must be taken to seek to improve the environmental credentials of the existing housing stock, where the majority of residents will continue to live. That means exploring the potential for retrofitting low carbon technologies and ensuring that applications for remodelling include a policy presumption that the dwelling as a whole should be considered in relation to matters such as insulation and energy use.
- 1.5. With the increasing amount of student accommodation within the City, further consideration should be given to designing accommodation with greater flexibility for future re-use, to ensure that the built fabric does not suffer from built-in redundancy. Making efficient use of all built form is usually more efficient and sustainable than wholesale redevelopment.

- 1.6. It is well-established that planning decisions have an impact on the demand for travel, and that Local Plans can effectively guide new development to locations better able to be served by sustainable means of transportation. It is not just about securing future-proof transport infrastructure in new developments. The opportunity should not be missed to seek to improve the sustainable transport offer within the existing built environment, provided that to do so remains consistent with the need to preserve and enhance the heritage of Canterbury City district.

### Historic and Natural Environment

#### **Issue NE1: How can we protect and enhance our heritage assets?**

- 2.1. The importance of the World Heritage Site within the medieval city is recognised in the two draft strategic objectives. This is welcomed. World Heritage Site status is a valuable asset to Canterbury City, but at the same time it brings with it very important responsibilities. The City Council is custodian, and the new Local Plan is one of the tools at the Council's disposal to help it in that role. It must therefore include planning policies which are effective in protecting both the built fabric of the WHS, but also crucially its wider setting.
- 2.2. Our client has repeatedly expressed concerns about progress (or lack of it) with refreshing the World Heritage Management Plan. This was due to be complete in the year 2019/20. Our client welcomes the renewed commitment to updating the World Heritage Management Plan. The Council's intention to rely on the updated Management Plan as part of the evidence base for the Local Plan 2040 is also supported. The current WHMP is almost 20 years old. Our client encourages the Council to review the WHMP as a priority. There has been a great deal of change, both physically (in terms of new development) and structurally (in relation to the role of the City in everyday life) the last two decades. The refresh must acknowledge the threats (and opportunities) arising from those changes in producing a management Plan that is fit for purpose for the coming decades, when the challenge of perhaps greater levels of change will likely manifest.
- 2.3. The Council has also committed time and resource preparing a corporate Heritage Strategy (July 2019). Our client was a contributor through the consultation process. This Strategy (and any near future Strategies) should inform the evidence base for the new Local Plan. It is disappointing therefore to note that the Heritage Strategy is referenced just once in the Preferred Options consultation. Given that it was apparent that the Heritage Strategy was intended to inform Council decision-making across the board, it seems short-sighted and arguably wasteful not to make use of what is still a relatively up-to-date and under-utilised Strategy.

- 2.4. That brings us on to another of our client's over-arching concerns – the need to properly protect and enhance heritage assets across Canterbury District. The starting point for the Local Plan 2040 should be an up-to-date evidence base to inform the new policies.
- 2.5. Local Planning Authorities are under a statutory duty to review their activities relating to conservation and in particular the conservation areas themselves. It is disappointing in this context that the Council's conservation area appraisals are out of date. For example, the Chartham CA Appraisal was produced in 2005 and has not been refreshed since. The Canterbury CA Appraisal was last updated in 2011, yet the City has seen much change in the last decade which should properly be reflected in an updated appraisal.
- 2.6. It is also important to take stock of the changed context deriving from the most recent round of Local Plan-led development. The impact in particular of urban extensions on the important historical approaches to the City ought to be considered *de novo*. The WHS status of the City referred to above demands an integrated approach. The setting of the WHS can be harmed in a myriad of ways by new development projects on its periphery. The recent fate of Liverpool must not be repeated here.
- 2.7. Lessons do need to be learnt from the management of previous development projects in this respect, picking out examples of best-practice and looking to avoid their worst excesses.
- 2.8. The Council are encouraged to focus in particular on the following important vistas:
- Christchurch STEM building – this development interrupts interconnecting views between the cathedral and St. Martins.
  - New House Lane – development at Wincheap has the potential to adversely impact views towards the WHS from Tonford, as does proposed development around the Canterbury hospital site.
  - The views into the City from Sturry and the relationship with the Riverside scheme at Kingsmead.
  - Public views from Thanington to the City and Cathedral spire, specifically along public footpath CB464. These is a historically important pilgrimage route in danger of being subsumed by suburban sprawl.
  - The Via Francigena from the City centre and the impact upon it of the Mountfield Park scheme.
  - Development at Canterbury University has the potential to compromise the visual interconnectivity between the rural hinterland and the Cathedral.

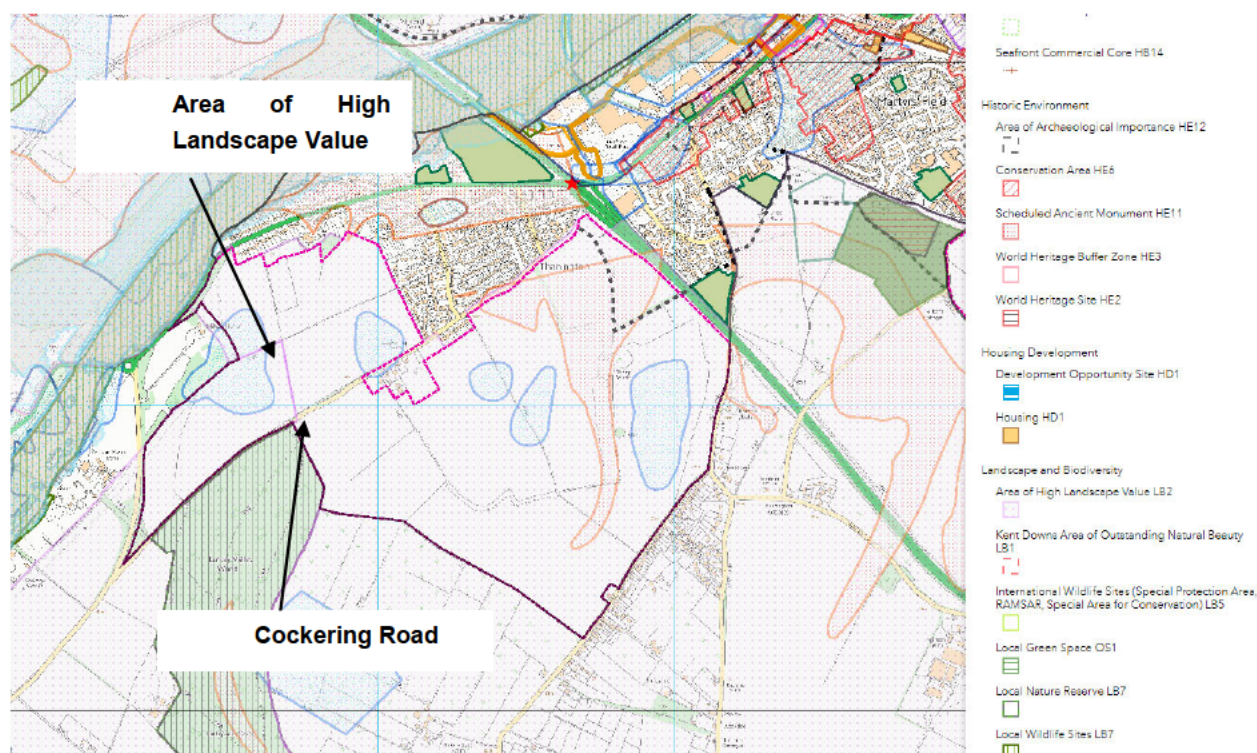
- 2.9. These are locally-valued vistas involving an important internationally significant heritage asset. The new Local Plan should be specific in identifying strategic views (including those listed above) for specific protection through development management policy. In addition, the Local Plan should go further and seek to find opportunities to reverse the loss of previously-compromised vistas, meaning that redevelopment projects should have regard to the reinstatement of lost or diminished views of the WHS as part of a means of better understanding and appreciating the significance of the City.

### **Issue NE3: How should protect and enhance biodiversity and green and blue infrastructure?**

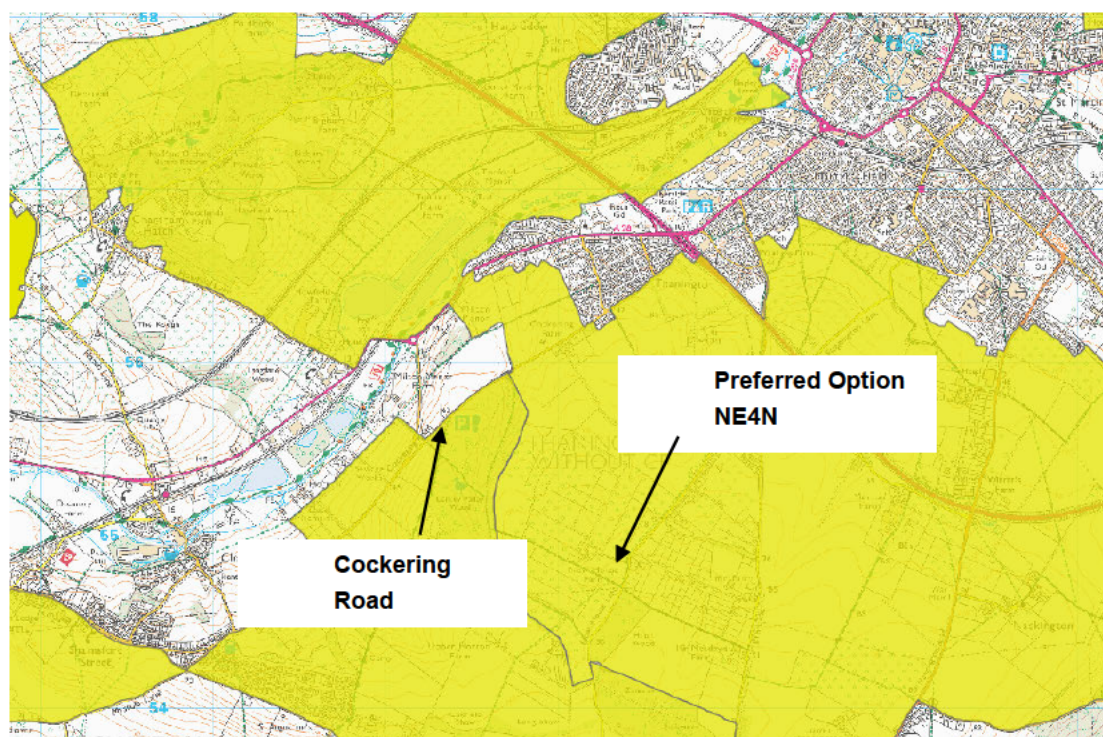
- 3.1. Our client is encouraged to see that the Council is preparing a district Tree Strategy. The Tree Charter developed by the Woodland Trust has helped to demonstrate the important role of trees, woodland and new tree planting, not only as landscape features but also as natural elements that contribute towards individual and community wellbeing. Their role in helping to combat climate change is also significant. The more local initiatives that are developed and embraced by the Council, the better the outcome for future generations of district residents.
- 3.2. However, the role played by hedgerows is underplayed. Hedgerows not only form strong architectural elements within the countryside, creating intimacy and continuity between open landscapes. They are nature's highways, providing movement corridors for wildlife, insects, birds and bats. Much of the City's tree cover is woven together by networks of hedgerows.
- 3.3. Specific policy protection should be afforded to allow natural hedgerows, meaning that hedgerow protection should be enforced side-by-side not only with requirements to strengthen existing hedgerows where under threat, but with the replanting of lost hedgerow as part of biodiversity net gain (BNG) initiatives.
- 3.4. In the response above to NE1, it is suggested that the Council make better use of the recently-prepared Heritage Strategy. Similarly, the Council has invested in preparing a Green Infrastructure Strategy (2018). The Strategy identified a number of key themes, issues and opportunities and includes a 5-year action plan running to 2023. The intention was that the Action Plan be renewed annually and updated if required. Many of the issues identified in the Green Infrastructure Strategy remain valid, and updating the Action Plan as part of the work on the Local Plan 2040 would make the best use of this resource.

**Issue NE4: How should we make sure that the local landscape designations (Areas of High Landscape Value) continue to protect our valued landscapes?**

- 4.1. Existing Local Plan Policy LB2 aims to preserve and enhance the distinctive landscape identified in the Canterbury District Landscape and Biodiversity Appraisal and the Kent Landscape Assessment. The rationale for doing so is based on the important archaeological, historical, and ecological associations that stem from these landscapes.
- 4.2. The existing Local Plan Proposals Map defines five Areas of High Landscape Value.
- 4.3. The Canterbury AHLV includes land between Chartham and Thanington (see Figure 1).



**Figure 1: Extract from the Canterbury City Local Plan Proposals Map 2017. Policy LB2 (Area of High Landscape Value) shown dotted purple. Our annotations.**



**Figure 2: Extract from the Preferred Options Map. This figure demonstrates Option NE4N for the landscape currently protected under Canterbury AHLV.**

- 4.4. The existing AHLV in the Cocking Road area is part of the Nackington Farmlands Landscape Character Area as identified in the **Canterbury Landscape Character and Biodiversity Appraisal prepared in 2012** as a “*gently rolling landscape with broad valleys reaching towards the City.*” The Nackington Farmlands area embraced not only the AHLV but also land within a Conservation Area as well as Local Wildlife Sites. The 2012 Appraisal also recognised the views towards the City from the Nackington Farmlands.
- 4.5. The Landscape Character Assessment and Biodiversity Appraisal (October 2020) defines various Landscape Character Areas. The Nackington Farmlands area (H4) was taken forward into this appraisal.
- 4.6. The Canterbury City AHLV Review for Local Landscape Designation Report (January 2021) describes the Nackington Farmlands as “*an interesting landscape with many points of natural and historic interest.*” The review goes on to note “*dramatic and surprising views from more elevated area and along valleys and the North Downs Way to Canterbury and the Cathedral in its Stour Valley setting. Key views identified include: Thanington footpath near Cocking Road*”

*on the rising side of the Stour Valley with the cathedral as a focal point.*” The Landscape Character Assessment and Biodiversity Appraisal seeks to protect these views.

- 4.7. It is very difficult to understand therefore why (despite the 2012 and 2021 reports identifying the Nackington Farmlands as an important landscape component), the Preferred Option (NE4O) concerning the Canterbury Area of High Landscape Value, proposes that the AHLV designation be removed.
- 4.8. The proposal instead is to introduce a softened “*criteria based approach setting out considerations like views.*” This is inadequate. The other option contemplated (NE4N) is to downgrade the AHLV as “*a new and different type of landscape designation*”. Under this option, there would be no landscape or heritage recognition, rather it would be an “*area valued for the role that the landscape plays in views and the setting of the city*”. The area so regarded would extend over the lands coloured yellow in Figure 2 above.
- 4.9. A new LCA known as F7: Stour Valley West has been defined, merging the two flat river valley areas at Chartham and Wincheap/Thanington. The F7 LCA runs along the river valley. The appraisal includes a number of positive comments in relation to glimpsed views to the Cathedral, as well as a sense of enclosure in a small scale landscape.
- 4.10. The Landscape Character Assessment and Biodiversity Appraisal (October 2020) makes development management recommendations, including that new building proposals within adjacent urban and suburban areas should “*ensure that an attractive and integrated edge is formed with this rural and open recreational landscape. This is important for existing edges as well as the new strategic allocations at Cockering Farm. Design of this development on the adjacent slopes should consider views from the valley and views to and from the city. Physical access into the Larkey Valley Woods SSSI (within I3) should be minimised to avoid an increase in visitor numbers*”. These guidelines are welcomed.
- 4.11. The concern remains however at both the Preferred Option (NE4O) proposing the deletion of the Canterbury AHLV, and Option NE4N, proposing a downgrading. The Preferred Option is not supported. Option NE4N is preferred, although no change (thus retaining the Canterbury AHLVA as a LDD) would still be the better outcome.
- 4.12. The rolling-back of a local landscape designation of this kind seems completely out-of-kilter with the direction of travel nationally. Our population is engaging now more than ever with the landscape on their doorsteps. To downgrade the level of protection afforded to such areas is to reverse a long-established trend in planning towards the protection of locally-valued landscapes.
- 4.13. This proposal sets an altogether unwelcome precedent. There are parallels with the early experience of English Heritage with the unsympathetic conversion of listed buildings. A number of such buildings were de-listed after conversion. However, if development projects are carried out sensitively and with due regard to the quality of the landscape, then there is no reason why

it should not continue to be locally-valued for its landscape characteristics. To de-designate areas developed within AHLVs gives precisely the wrong message – that the valued landscape must inevitably be subsumed and ultimately lost.

### Summary

- 5.1. The City Council has rightly declared a climate emergency. The new Local Plan is one of its more important tools in looking to manage the situation. To be effective, policies must embrace energy efficiency in all new development, and the transport consequences of planning decisions must be considered.
- 5.2. The World Heritage Site status of the City is a cause for pride, but is also a shared responsibility. The Council produced a Heritage Strategy as recently as 2019, but this is scarcely referenced.
- 5.3. Canterbury District has a strong and unique heritage and one that should be protected by meaningful policy. The evidence base for heritage and the historic landscape remains inadequate however. It should be refreshed to take on board the consequences of the most recent developments in the district, and set out clear actions and policies to protect key heritage assets in Canterbury district, such as the World Heritage Site (including views).
- 5.4. The Local Plan should identify key strategic view points for policy protection. Furthermore, it should look to re-establish vistas compromised or lost through earlier developments.
- 5.5. Our client also raises concern in relation to the Local Authority's intention to remove the current protection from the Canterbury AHLV, or at least to downgrade it. This is inconsistent with the evidence base and is a retrograde step. A firm objection is raised.
- 5.6. The recent focus on the importance and role of trees in the district is welcomed. However, the Local Plan 2040 should recognise the importance of hedgerows in tying together and providing the context for our trees and woodlands. Policy should require the re-instatement of lost hedgerows as part of biodiversity net gain projects. The Council's Green Infrastructure Strategy Action Plan should be updated to support the Plan.
- 5.7. We trust that the Council will take these comments in to account when preparing the submission version of the Local Plan 2040.