

SECTION 3 - REPONSE TO THE ENVIRONMENTAL STATEMENT

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RESPONSE TO THE ENVIRONMENTAL STATEMENT

Introduction

The Environmental Statement (ES) is very long and detailed, but the accumulation of detail obscures the overall environmental impact of the proposed development. The ES is misleading in the following general respects:

(a) It focuses primarily on the individual components of the area – individual species, specific viewpoints, etc. Although it pays lip-service to the cumulative impact of these (chapter 14), at no point is there any real assessment of the overall change to the environmental character of the area.

(b) It makes frequent use of the word ‘mitigation’ as a technical term which is potentially misleading. The word is defined at ES 1.38 as ‘measures to avoid, reduce, remedy or compensate for adverse impacts’. In everyday language ‘mitigation’ suggests a lessening of the destructive effect on the environment. In this report, however, ‘mitigation’ measures are largely confined to ‘compensation’, such as planting new trees, or moving protected species elsewhere. This again obscures the loss of the overall environment.

These general flaws undermine the conclusions of the ES at four levels: (a) particular species of flora and fauna; (b) the environmental area as a whole; (c) environmental amenity space; (d) the wider setting.

(a) Particular species of flora and fauna

The main emphasis here is on protected species, especially bats, dormice, and great crested newts. Dormice are mentioned because ‘Kent is a known stronghold for this species’ (*Non-Technical Summary* 94), but none have been found on the site. No bat roosts have been found but bats forage in the woodland on the site (NTS 92), so it is proposed that new foraging areas will be created for them by the planting of new trees and grassland and a new pond (6.204-6). Great crested newts will be captured and relocated to a newly created habitat (NTS 99).

These ‘compensation measures’ are implausibly optimistic. It is not at all clear that bats will continue to find a suitable habitat in the radically changed and densely populated environment, whatever the new planting which takes place. And the proposals for great crested newts gloss over serious questions about this kind of mitigation. Their existing habitat has evolved over time as a result of a very specific combination of factors and there is no certainty that an equally sensitive habitat can be successfully created elsewhere.

There is very little in the ES about flora and fauna which are not protected species. Birds, for instance, are discussed in a general way (6.126-131), but the conclusion reached is that because the negative impact ‘would not be detrimental to the local conservation status of any species, this impact would be expected to be of a relatively low magnitude’ (6.180).

This entirely glosses over the fact that the existing bird life is one of the things that makes it an attractive environmental area. Granted the species here (owls – not mentioned -, woodpeckers, jays, blackbirds, thrushes etc.) are not rare or protected species, and there will still be owls, woodpeckers and the like elsewhere. But their presence *here* contributes importantly to a rich natural environment which is enjoyed by local people and the university population alike, and an area dominated by nine large buildings, a large car park, and 800 students would have nothing like that rich diversity of wildlife. In short, the species may survive, but this habitat, these birds and animals in this location, will not.

(b) The environmental area as a whole

As already mentioned, the primary focus on particular species obscures the negative impact on the area as a whole. It is described as 'currently an area of amenity land, meadow and woodland bounded and crossed by hedgerows' (1.29). It will entirely cease to have that character, but the language used throughout the ES is persistently evasive and disingenuous on this point:

- 'The preferred concept ('the scheme') has... the hub and townhouse accommodation wrapped around a central village green' (NTS 36)
- 'The resultant scheme is a simple 'fluid' landscape...' (NTS 51)
- 'The landscape has been designed to gently wrap around the built form' (NTS 51)
- 'The scheme uses a pared down palette of grass, meadow, bulbs, shrubs and trees to provide the backdrop to the architecture.' (NTS 52)

This is pure PR-speak! The frequent use of the terminology of 'landscape' glosses over the fact that the landscape will disappear. The landscaping of large buildings is not a 'landscape'. There is much reference to the retention of 'high quality trees' and the planting of new trees (NTS 54), but trees interspersed among large buildings are not 'woodland'. Grassed areas between buildings are not a 'meadow' or even a 'village green'! The development will change the character of the area entirely, and this is never honestly acknowledged.

The language of 'mitigation' is again used:

A design aim of the scheme is to mitigate for the loss of ecological value of the site where semi-natural habitats are to be replaced by areas of building and hard standing.... It will not be possible to replace habitats on an area for area basis within the site footprint. Therefore, areas of habitat in the wider landscape around the site will be provided to enhance their value for wildlife. (NTS 56)

This gives the misleading impression that there will be no loss of habitat overall. It entirely glosses over the extent of the environmental loss. Three fields will be fundamentally affected. The southernmost field will be dominated by seven of the proposed buildings, and though it may retain some trees and grassed areas it will no longer be a meadow but a built area. The field to the north-east (the old orchard) will contain two of the large accommodation blocks. Half of this field will therefore be built over, including the wildflower meadow managed since 2009 by the student

Conservation Society and extensively publicised by the University as part of its "Creative Campus" project. The character of the rest of the field will also be destroyed, dominated as it will be by the built area. And the field to the north will contain a car park for 120 cars, so that the surviving grassland above it will similarly lose its attractive character.

The Planning Statement consistently downplays the environmental value of these fields, in sentences such as the following:

2.14 - 2.15 The northern part of the site comprises of a block of relatively young woodland...of moderate condition and has low botanical and ecological value.

2.19 The rest of the site is comprised of semi-improved grassland of moderate to low ecological value.

The woodland and grassland are presumably judged to be of 'low ecological value' in the artificially narrow sense that they harbour no protected species, but in any other sense they constitute a natural environment of great value which is recognized as such by local people, by visitors and by the University itself in its publicity.

The Planning Statement also entirely glosses over the proposal for the complete removal of the historic double hedgerow running NW-SE between the fields. This proposal is relegated to a separate application CA//11/00531, and in the main application it is alluded to only in passing:

5.59 It is acknowledged that the proposal will result in the partial loss of hedgerows on the site which do have historical value and interest. However, it is considered that this loss is off-set by the wider benefits of the development and can be mitigated through preservation by record, research and publication which, in itself, offers the opportunity for an increased understanding of the feature.

The language of 'mitigation' has here reached the point of absurdity. 'Preservation by record' is not environmental conservation. It is a euphemism for environmental destruction.

The three fields which would be built on are at present almost the only unspoilt natural environment on the University's southern slopes. Virtually all that will remain of the southern slopes will be the area of woodland below Keynes College, and the slopes below Eliot College and Rutherford College – attractive parkland but not really describable as 'natural environment', and frequently marred by student leisure activities and the accompanying litter. In short, the famed 'southern slopes' which give the University its distinctive character will to all intents and purposes cease to exist.

(c) Environmental amenity space

These fields are not just a habitat for wildlife. They are an environmental amenity which is greatly appreciated and enjoyed by the people who use it. Virtually nothing

is said about this in the ES section on 'Landscape and Visual Amenity', which concentrates almost entirely on particular viewpoints. Even the impact on these is minimised. It is said that the 'significant long term impacts will be localised' (NTS 111). 'Mitigation' is again envisaged:

The buildings and landscape have been designed to integrate the development into the existing landform. New tree planting will mature and help screen the development from Viewpoint 1 and soften the appearance of buildings from Viewpoint 2. (NTS 112)

The view across the fields to the city and Cathedral from the University Road south of the entrance to Keynes College (Viewpoint 1) is at present one of the glories of the campus and of the district. It is true that the city and Cathedral will still be visible from that point, but it will be a view not over the fields but over the tops of nine large buildings, and no amount of 'screening' will disguise the fact. Likewise the view up the hill from Viewpoint 2 (the footpath along the southern side of the site, and the adjacent houses) will not be 'softened'. It will be blocked. (See Appendix 2.)

But in any case the existing 'landscape and visual amenity' is much more than viewpoints. No mention is made of its value as an environmental amenity enjoyed extensively by local people and by university staff and students as an area for exercise and recreation. It is an area where children play, where people from far afield come to walk their dogs, and where the people of Canterbury can walk in the fresh air and enjoy the wild life. Because the new development will be spread over all three fields, it will effectively eliminate that amenity. The development may be 'landscaped' with ponds and tree-lined pathways, but a walk through student residential accommodation and past a hotel and conference centre is not a walk across the fields, and no amount of 'mitigation' can compensate for this.

(d) The wider setting

The site is in a wider landscape area known as the Stour Valley Slopes and recognised in the Canterbury District Local Plan as an Area of High Landscape Value under Policy R7 (one of the Saved Policies). The sensitivity of this wider setting was acknowledged in the Local Plan's Supplementary Planning Guidance for the University of Kent Business Innovation Park, which would be located between the new Innovation Centre and Keynes College. The relevant guidance was as follows:

3.18 Although landscape sensitivity and views from the city are constraints upon development it is considered that there are also significant opportunities to site and design a new business innovation park complex which respects the landscape character, whilst also achieving some of the following appropriate actions for the Stour Valley Slopes, as set out in the Canterbury Landscape Appraisal Plan. These are:

- Strengthen the boundary on the edges of Hales
- Locate estate in a manner that reflects the historic connections
- Strengthen and recreate the traditional field pattern
- Conserve and restore open grass slopes overlooking the city
- Resist further fragmentation

- Strengthen the structure of the field pattern on the slopes beneath the University, resisting the further introduction of scattered ornamental planting
- Resist the introduction of dominant features on the visually sensitive skyline.

It is incontestable that the Chaucer Fields development would contravene several of these policies. It would destroy, not conserve, the open grass slopes overlooking the city, and would eliminate rather than strengthen the structure of the field pattern on the slopes. The implication is clear. If the University were to go ahead with the Chaucer Fields development, it would violate the conditions laid down for the Business Innovation Park in the Local Plan.

This also suggests one possible solution to the problem of where to locate the proposed development. There has been much stress on the close synergies between it and the Innovation Centre. If that is so, then an appropriate place for it would be as part of the Business Innovation Park, the plans for which are not very far advanced. This would be a much less sensitive location, with a much lower environmental impact. If the whole of the intended development could be located there, well and good. If there is insufficient space for all of it, then at any rate the conference centre and associated accommodation could be included in the Business Innovation Park and space could undoubtedly be found for more student residences in the Parkwood complex or elsewhere on the main campus. (See Section 4 of this submission on alternative sites)

Conclusion

The ES deals at length with detailed environmental impacts and suggests ‘mitigation measures’, but entirely fails to acknowledge the overall loss of a large area of the natural environment which is also a major amenity for the local population and for the University itself. The attractive southern slopes of the University will disappear. Even if the new development is as effectively ‘landscaped’ as is claimed, the environment will be totally transformed. This is vividly illustrated by the following pair of images, of the southern slopes as they are now and as they would look (Appendix 1). The first photograph shows the view across the southernmost field from the edge of the woodland towards the Cathedral. The second image is an artist’s impression of the new development taken from the University’s own presentation (<http://uok-consultation.co.uk/>), and shows what would become of that same view if the application were to be approved.

The proposed development should be firmly rejected on environmental grounds.

APPENDIX 1

View from north towards the Cathedral – as it is now...



...and as it would be



APPENDIX 2

View from the south, as it is now...



...and as it would be

