

## **Comments on the Canterbury City Council [Draft Biodiversity Strategy](#) from the Canterbury Society**

### **To what extent do you support the overall biodiversity vision for nature in Canterbury district by 2042/43?**

It is encouraging to see the development of the Draft Biodiversity Strategy following the declaration of a biodiversity crisis by Canterbury City Council in 2023. The Vision of the Draft Biodiversity Strategy is ambitious. It is excellent to see that the focus is on both nature recovery and resilience, as well as on better connectivity and the expansion of wilder landscapes. The inclusion of the role of residents, businesses, partners, communities and developers is vital to improving and protecting biodiversity in the district. It is promising to see that the Draft Biodiversity Strategy ambitiously secures the delivery of 20% biodiversity net gain in line with the Draft Local Plan, which is above the national statutory 10% BNG. The Canterbury Society very strongly supports the overall biodiversity vision for nature in the Canterbury District.

While the Canterbury Society supports the vision, this support is subject to the inclusion of measurable outcomes, clear delivery priorities, and a defined monitoring framework to ensure the strategy translates into tangible biodiversity improvements. In particular, the strategy would benefit from setting out a baseline, target and timeframe for key biodiversity indicators across the district, such as:

- extent and condition of priority habitats (hectares restored or created)
- ecological status of the River Stour and other watercourses
- %age tree canopy cover across urban and rural areas
- connectivity of the ecological network (such as habitat corridors and fragmentation)
- condition of designated sites (such as % of SSSIs in favourable condition, this was [KPI 8.2](#) in a previous corporate plan)

### **Do you feel that there are any areas around biodiversity which are missing or need more detail (eg. funding, delivery, community role)?**

The inclusion of a clearly communicated and visually appealing map of the habitat structure of Canterbury District on page 6 is excellent. The map highlights how the Stour River Valley forms a very significant, and rare habitat, running through the centre of Canterbury District. Therefore, something could be included on the initiative for a charter for the Stour River, which is being worked on by the Friends of the Kentish Stour, and the important role of the rights for rivers movement in protecting our precious chalk stream river. The key rights of rivers should be included: the right to flow, the right to perform essential functions, the right to be free from pollution and the right to native biodiversity. This could perhaps be included under Action point BA 8 or a separate action point under Partnership Working.

The strategy could strengthen its approach by setting out clear ecological objectives

for the River Stour, including improvements in water quality, habitat condition, and connectivity, aligned with Environment Agency data and catchment-based partnerships.

The important role of local river guardians should also be included, especially as Canterbury District already has a significant number of river wardens/guardians volunteering with the Kentish Stour Countryside Partnership who work alongside the Council. These river guardians are involved with, in the river litterpicks, and many have been trained in riverfly monitoring which they carry out on their stretch of the river. The contribution of citizen science could be formalised through a district-wide monitoring framework, linking volunteer data (such as [riverfly monitoring](#), [Bioblitz](#) records) into an annual reporting process to track biodiversity trends.

Something should also be added about the value of citizen science projects of which there are several examples in the district, just one example is the annual Bioblitz held by University of Kent.

It is most encouraging to see (in Action BA17) that the council will maximise opportunities for Biodiversity Net Gain delivery on Canterbury City Council sites with associated 30 years conservation covenants / funding. It is also encouraging to see the inclusion of training and increased awareness of biodiversity to be given to Contracts and CANENCO (in Action Point BA18) so that they can deliver biodiversity positive grounds maintenance, as this has often been a serious weakness in achieving good results for biodiversity. Good training of the Canenco ground maintenance team to effectively continue the positive biodiversity improvements made in Canterbury' parks and open spaces during the LUF project, is going to be essential going forward. Perhaps ways could also be sought to create greater communication and positive working between Contracts/Canenco and Friends Groups, to enhance these outcomes for biodiversity across our parks and open spaces. This should be supported by defined performance standards and monitoring, including measurable outcomes for habitat condition, mowing regimes, and species recovery across council-managed land.

## **Do you have any other comments about the Biodiversity Strategy?**

### **How can we better support your work in nature recovery?**

The strategy would benefit from a clearer statement of governance and accountability, including how progress will be reported publicly and how delivery will be overseen through the Council's committee structure.

Very little has been included in the actions regarding the Council's role in enforcement to ensure biodiversity in Canterbury District is protected and improved. Enforcement will be required to ensure new developments achieve 20% biodiversity net gain. At the basic level this will require checking up that new trees planted are watered and that any which die are replaced. Effective, clear signage and enforcement regarding littering/flytipping (particularly along the Stour River greenbelt) is essential. It would be encouraging to see a commitment that the

Council will work in partnership with the Environment Agency and Police to enforce an end to the targeting of wildlife by those using catapults, as well as clear signage regarding the closed seasons for fishing. In addition, the Council should set out how it will monitor and enforce Biodiversity Net Gain over the full 30-year period, including resourcing for compliance checks and long-term habitat management.

As mentioned under The Principles Underpinning this Strategy, the Council's leadership role is key to the success of the Biodiversity Strategy. At present CCC plays a very important role in assisting communities to set up Friends of Groups. It also guides and supports these groups with improving biodiversity and developing management plans for the green spaces they support - CCC does this extremely well. Continued support for Friends Groups could be strengthened through a formal partnership model, including shared objectives, small grant funding, and structured communication with council services.

Although, Canterbury Society agrees with the focus in the draft strategy on larger landscape-based nature recovery and resilience, we feel that the council has an important leadership role to encourage and support action from residents, businesses and other community groups who own gardens to also help support biodiversity. It would be a missed opportunity not to include this in a further action point. The gardens in Canterbury District make up an important, although not huge percentage of green space in the district. (Developed land according to the Draft Local Plan makes up 9.5 %, some of which will be gardens. Not nearly as big as the 90.2 % undeveloped land in the district, but still important, especially when wildlife in farmed areas is under threat.) It would be good to see the inclusion of CCCs leadership role specifically in providing clearly communicated guidelines for ways in which owners of private gardens/open spaces can work together to create improvements for biodiversity. The Council could promote what residents and businesses can do or are already doing. There should be an ambition to promote biodiversity net gain in existing gardens, just as new developments are expected to provide 20% net gain for biodiversity. These actions should include communities working together to: create hedgehog highways between properties across whole streets, installing swift boxes, house martin nests, bat boxes, insect hotels (and/or messy wilder spaces in gardens for invertebrates), growing areas of native wildflowers, seeking alternatives to use of pesticides and herbicides, planting of native hedges instead of, or in addition, to fencing, and inclusion of/protection of native trees in their gardens. Encouragement to reverse the concreting over of gardens in Canterbury could also be included. This could perhaps form a further action point under Community Working. The Council could support this through the development of a simple, accessible biodiversity toolkit for residents and businesses, setting out practical actions and linking these to wider district biodiversity objectives.

More broadly, examples from other local authorities demonstrate that biodiversity strategies can include quantified targets, annual monitoring frameworks, and clearly defined delivery mechanisms. For example, [Bath and North East Somerset Council](#) publishes annual progress reports with scored actions and ecological baselines;

[Bristol City Council](#) has set city-wide targets such as managing 30% of land for wildlife by 2030 with supporting KPI tracking; and [West Oxfordshire District Council](#) has established a KPI-led monitoring framework with annual reporting. Incorporating similar elements would strengthen Canterbury's strategy and improve its ability to deliver measurable outcomes over time.

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*On behalf of [Canterbury Society](#)*