

Thanet District Council



Statement of Common Ground

with

Natural England

July 2019

Statement of Common Ground – TDC and Natural England (NE)

Introduction

This Statement of Common Ground relates to representations received from Natural England on the draft Thanet Local Plan to 2031 at Regulation 19. It outlines how Thanet District Council (TDC) intends to deal with the representations received and identifies any outstanding issues.

Co-operation between TDC and NE

There has been ongoing involvement with various staff members at NE through all the stages of plan preparation. This has ranged from general consultations, to more detailed work on policy wording particularly in relation to international wildlife sites, and involvement in specific areas of work such as the SAMM.

The Council has tried to accommodate most of NE's suggestions on policy wording.

NE Representations

The following tables set out in Chapter order, detail TDC's responses to NE's representations by Heather Twizzell, at Regulation 19 which are suggested for consideration by the Inspectors as modifications to the plan. These are taken as agreed unless comments are raised under the outstanding issues section.

Some changes have evolved during the first set of hearings at the examination and amendments have been detailed in matter statements and this has been reflected in the Council's response in the following tables.

Chapter 2: Town Centre Strategy and Chapter 7: Economy

Respondent	Policy/Para	Representation	Proposed Amendment
Natural England	Margate, Ramsgate and Broadstairs SP08, SP09 and SP10	<p>Cross reference should read:</p> <p>Development will only be permitted under this policy where it can be demonstrated that it will not adversely affect any designated nature conservation sites through any pathway of impact, including increased visitor pressure. Development proposals must comply with the requirements of SP25, SP26 and GI01.</p>	<p>Amend the HRA wording for each policy as requested.</p> <p>NE agrees</p>
Natural England	Thanets Beaches E10-E12	<p>It is suggested that the wording is amended slightly to say “Development proposals must <i>avoid or</i> fully mitigate against any impact upon the designated conservation sites. This would better reflect the hierarchy set out in the NPPF.</p>	<p>Amend policies as requested</p> <p>NE agrees</p>
Natural England		<p><i>Policy E07 - Serviced Tourist Accommodation</i></p> <p>Natural England supports the provision of clause 4 to this policy and the recognition that some types of tourist accommodation have the potential for similar recreational pressure impacts on Thanet’s designated nature conservation sites as new housing.</p> <p><i>Policy E08 – Self Catering Tourist Accommodation</i></p> <p>We would urge your authority to caveat this policy with the same final clause as E07 with regards to the potential need to mitigate for recreational pressure</p>	<p>Matter Statement 11 Issues 1 and 2 proposes new wording for policies E07 and E08. The relevant clause for both says:</p> <p><i>“Sufficient mitigation should be provided to prevent any material increase in recreational pressure on designated nature conservation sites”</i></p> <p>NE Notes new wording and agrees</p>

Respondent	Policy/Para	Representation	Proposed Amendment
		impacts on the designated nature conservation sites.	
Natural England	E16 Conversion of rural buildings for economic development purposes	<p><i>Conversion of rural buildings</i></p> <p>Paragraph 10.5 – we welcome the recognition that disused rural buildings may be important for protected species although this paragraph currently refers incorrectly to the ‘Wildlife and <i>Conservation Act 1981</i>’ which should be corrected to the ‘Wildlife and Countryside Act 1981 (as amended)’. You may also wish to consider referring to the Conservation of Habitats and Species Regulations 2017 instead as this is the highest tier of relevant legislation (transposing the European Habitats Directive into UK law) – all bat species are protected under the Habitats Regulations for example.</p> <p><i>Policy E16 - Conversion of rural buildings for economic development purposes</i></p> <p>We welcome the inclusion of clause 6 in relation to protected species but would suggest the following alternative wording: ‘Where the building currently contains protected species, any negative impacts should be fully addressed following the avoid, mitigate, compensate hierarchy.’</p>	<p>Amend reference in paragraph 10.5 as requested.</p> <p>It was originally proposed to amend Clause 6 as requested, however, the Matter Statement 16, Issue 3, Question 4 omits the change. This can be brought to the Inspectors’ attention on Hearing Day 15 - Wednesday 17th July</p> <p>NE agrees</p>

Respondent	Policy/Para	Representation	Proposed Amendment
Natural England	Soils Para 10.11	There does not appear to be any wider policy protection of soils more generally in the Plan and we would encourage you to address this and consider where in the Plan it would best sit.	Add to paragraph 10.11 “The National Planning Policy Framework also states that the planning system should protect and enhance valued soils and prevent the adverse effects of unacceptable levels of pollution. This is because soil is an essential finite resource that provides important ‘ecosystem services’, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. As part of the government’s ‘Safeguarding our Soils’ strategy, Defra has published a Code of practice for the sustainable use of soils on construction sites. The Council would encourage developers to have regard to this.”

Chapter 3: Housing Strategy

Respondent	Policy / Para	Representation	Proposed amendment
NE	Policy SP12 - General Housing Policy	We would query whether the reference to Policy SP26 in clause 7 of this policy only serves to confuse matters. ALL net increases in residential development within Thanet District will be required to contribute to the SAMM Plan whether they are sites allocated in the Local Plan or windfalls. SP26 makes this clear but we have some concerns that reading SP12 it might seem as though this only	This was discussed at the examination, under Matter Statement 1 Issue 5 Q10. As a result it was agreed to retain clause 7 in order that HO1 (windfall sites) would cross reference to the policy requirements of SP12 including SAMM contributions. The rest of the policy it is proposed to amend as follows with new text underlined and delete reference to the 400m buffer.

Respondent	Policy / Para	Representation	Proposed amendment
		<p>applies to allocation sites.</p> <p><u>400m Buffer</u> We are also slightly concerned by the reference to a 400m buffer around development sites when assessing impacts on SPA functional land. The evidence for this distance is not immediately clear but from reading the HRA it appears it may stem from the 400m buffer which was enshrined in various levels of policy protection covering the Thames Basin Heaths SPA in Surrey.</p>	<p>Proposals for residential development on sites allocated in this plan must:</p> <ol style="list-style-type: none"> 1. Provide one electric car charging point for every 10 parking spaces provided in communal areas, or one charging point to be provided for every new dwelling with parking provision within its curtilage 2. Retain existing boundary features where possible 3. Provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider 4. Allow future access to the existing water supply infrastructure for maintenance and upsizing purposes 5. Provide for the installation of digital infrastructure 6. Provide for the installation of Fibre to the Home (FTTH) 7. Contribute towards the Strategic Access Management and Monitoring scheme to meet the requirements of <u>SP25 SP26</u> <p>Additionally, proposals for 10 or more units must:</p> <ol style="list-style-type: none"> 1. Provide an appropriate mix of dwellings (including care and supported housing) to meet the requirements of Policy SP19 2. <u>Include an element of Make every reasonable effort to accommodate any self-build properties where there is a demonstrable requirements demand from</u>

Respondent	Policy / Para	Representation	Proposed amendment
			<p><u>persons</u> included in the Councils self-build register</p> <ol style="list-style-type: none"> 3. Provide affordable housing to meet the requirements of Policy SP20 4. Provide accessible homes to meet the requirements of Policy QD05; <u>and</u> 5. Include an assessment of the sites functionality as a roosting or feeding resource for the interest features of the Thanet Coast and Sandwich Bay SPA Special Protection Area, including areas within 400m of the development site's boundary, and provide mitigation where necessary habitat for wintering and breeding birds cited in the <u>Thanet Coast and Sandwich Bay Special Protection Area</u>, and provide mitigation where necessary. All development must comply with policies relating to the Protection of International and European Designated Sites and associated Mitigation Strategy. <p><u>Applications for A Statement of Social Impacts will be required for developments of for 50 or more dwellings shall provide an assessment of the need for community facilities (other than those required for educational or medical purposes) and the amount of floorspace required to meet this need to be approved by the Council, addressing any needs for community facilities identified in the Infrastructure Delivery Plan. Where such facilities are required, they shall include Strategic Sites will also be expected to</u></p>

Respondent	Policy / Para	Representation	Proposed amendment
			<p>provide complementary uses such as community business space, for the purposes identified in para 3.21 above.</p> <p>A Heritage Impact Assessment will be required at the <u>masterplanning stage</u> for the strategic sites to assess any cumulative impacts of the site allocations and highways infrastructure on heritage assets and archaeological resources.</p>
NE	SP18	<p>Natural England would query why this is the only Strategic Housing Site policy (SP13-SP18) to include a specific clause (4) requiring an assessment of the site's potential to support breeding or wintering birds. Is there particular evidence held around this site that requires policy protection over and above that given in clause 5, part 2 of SP12? Even if evidence is provided that clause 4 is justified we believe it will still require some rewording. Should survey work demonstrate that the site is of value for breeding or wintering birds what is required is more likely to be mitigation than enhancement.</p>	<p>This was discussed at the Examination on Hearing Day 5 under Matter 5, Issue 7, Q12 and it was agreed that the requirement for ecological surveys should be deleted from this policy.</p>

Chapter 4: Environment Strategy

Respondent	Policy / Para	Representation	Proposed amendment
NE	SP22	Include a reference to green wedges being a form of GI	<p>Add reference to GI in paragraph 4.6:</p> <p>4.6 The Green Wedges are significant in shaping the character of Thanet which has historically been a 'horseshoe' of built development wrapping around the coast. The Green Wedges provide a clear visual break when passing between the towns, giving a recognised structure and identity to Thanet's settlements. The Green Wedges are distinct from other types of open space as they provide a link between the open countryside and land which penetrates into the urban areas. The Green Wedges also make a valuable contribution to green infrastructure for the District.</p> <p>This is set out in Matter Statement 15 Issue 1 Q3</p>
NE	Para 4.36	<p>Add “ An Appropriate mix”</p> <p>Add text to supporting paragraphs along the lines of ...</p> <p>good GI can provide other benefits including healthy water and nutrient cycles, improved air quality, managing flood risk and water pollution and minimising the effects of climate change. More direct benefits to local communities such as general enjoyment of the natural environment and improved health and wellbeing.</p>	<p>Add wording to the following paragraphs:</p> <p>4.36 There are various Green Infrastructure projects being progressed by the Council and other organisations, and also a number of community projects. These include Dane Valley Woods, Westbrook Undercliffe Nature Park, Friends of Mocketts Wood, Montefiore Woodland and the Windmill Community Allotments. All large development sites will be expected to contribute to Thanet's Green nrastructure by providing any of the following: in line with Policy SP24 which should include an appropriate mix, compatible with the surrounding landscape</p>

Respondent	Policy / Para	Representation	Proposed amendment
			<p>and habitats. The Government has recently published its 25 Year Environment Plan (2018) which seeks to connect people with the environment to improve health and wellbeing through the creation of new green infrastructure. At the local level further guidance on the provision of green infrastructure including provision of new rights of way and cyclepaths can be found in Kent Design.</p> <p>Amend wording to Paragraph 4.37 as follows and Delete bulleted list as now in new paragraph 4.37a</p> <p>4.37. The Council seeks to continue increasing and enhancing Thanet's Green Infrastructure network, and will encourage new community Green Infrastructure projects by working with relevant organisations. The Council will produce a Green Infrastructure Strategy in consultation with relevant groups and organisations following adoption of the Plan. The Plan sets out the strategic approach to Green Infrastructure in policy SP24 which aims to deliver the strategic objectives by protecting, maintaining and enhancing biodiversity and the natural environment and creating a coherent network of Green Infrastructure. More detail will be added in the forthcoming Green Infrastructure Strategy. <u>Provision of new green infrastructure in new developments, can provide additional opportunities for informal recreation and dog walking which provide benefits that complement the necessary SAMM measures at the coast, and</u></p>

Respondent	Policy / Para	Representation	Proposed amendment
			<p><u>potentially help to reduce the impact of visitor pressure.</u>, although this is in addition to any mitigation that may be required through the SAMM It can also aid restoration of the landscape, improve biodiversity and improve connectivity between habitats or habitat features such as hedgerows. Good Green Infrastructure can have additional benefits to the wider ecosystem services including healthy water and nutrient cycles, improved air quality, managing flood risk and water pollution and minimising the effects of climate change. There are more direct benefits to local communities including the enjoyment of the natural environment and improved health and wellbeing.</p> <p><i>Insert new paragraph after 4.37</i></p> <p>4.37a Development proposals should, wherever possible and feasible:</p> <ul style="list-style-type: none"> • create new wildlife and biodiversity habitats; • integrate Sustainable Drainage Systems (SuDs); • plant hedgerows and trees; • provide green roofs; • create ponds; • create urban green corridors; • create roadside verges; • provide and manage new accessible open space including linear routes, for informal recreation/walking and dog walking and provide linkages between areas of open

Respondent	Policy / Para	Representation	Proposed amendment
			<p>space;</p> <ul style="list-style-type: none"> • provide private gardens and play space; • conserve and enhance the character of historic green spaces; • provision of off-site enhancements; • contribute to the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges including the introduction of linear features such as native hedgerows and water bodies where appropriate; • reinforce and/or restore landscape character in line with the relevant landscape character assessment guidelines. • Planning new Green Infrastructure assets to maximise their provision of ecosystem services including, but not limited to, improved air quality, natural flood management and climate change adaptation where appropriate; • Other suitable planting schemes to provide biodiversity opportunities. <p>This is set out in Matter Statement 15, Issue 2 Q1.</p>
NE	SP24	<p>Suggest rewording policy <i>All development proposals should respect protect and where possible, enhance Thanet's Green Infrastructure network by integrating multi-functional Green Infrastructure provision in the design of developments. Opportunities to improve Thanet's Green Infrastructure network by protecting and enhancing</i></p>	<p>Some of this is now covered by new paragraph 4.37a – see above.</p> <p>Amend policy 24- Green Infrastructure</p> <p>All development proposals should, respect and where possible, safeguard Thanet's Green Infrastructure network and enhance it by</p>

Respondent	Policy / Para	Representation	Proposed amendment
		<p>existing Green Infrastructure assets and the connections between them and creating new ones should be included early in the design process for major developments along with consideration of how they will be managed and maintained in the long term.</p> <p>Development should make a positive contribution to Thanet's Green Infrastructure network by:</p> <ul style="list-style-type: none"> • Creating new wildlife and biodiversity habitats • Providing and managing new accessible open space, including linear routes, for informal recreation/walking and dog walking • Mitigating against the loss of any farmland bird habitats (This would sit better under SP27) • Providing private gardens and play space; • Contributing towards the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges (including the introduction of linear features such as native hedgerows where appropriate) • Reinforcing and/or restoring landscape character in line with the relevant landscape character assessment guidelines <p>Planning new GI assets to maximise their provision of ecosystem services including (but not limited to) improved air quality, natural flood management and climate change adaptation.</p> <p>Investment and developer contributions should be directed to improve and expand Green Infrastructure and provide connecting links where opportunities exist.</p>	<p>integrating new multifunctional Green Infrastructure provision in the design of developments. Opportunities to improve Thanet's Green Infrastructure network by protecting and enhancing existing Green Infrastructure assets and the connections between them and providing new Green Infrastructure assets should be identified early in the design process for major developments, together with consideration of how they will be managed and maintained in the long term.</p> <p>Development should make a positive contribution to Thanet's Green Infrastructure network by wherever possible and appropriate, by the incorporation, provision or fulfilment of those matters and objectives set out in para. 4.37 above.</p> <p>This is set out in Matter Statement 15, Issue 2 Q1.</p> <p>NE Notes changes and agrees</p>

Respondent	Policy / Para	Representation	Proposed amendment
NE	SP25	Policy GI02 - Locally Designated Wildlife Sites We support the final clause of this policy requiring new development to enhance and improve connectivity to local wildlife sites and would like to see something similar appended to Policies SP25 and GI01.	Not sure this is relevant to SP25 as this is a protection policy. It is included in other policies such as SP27 and the plan needs to be read as a whole
NE	SP25	The policy should correctly refer to The Conservation of Habitats and Species Regulations 2017.	Sites of International Nature Conservation Importance will receive the highest level of protection. Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in-combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2017 2010 (as amended) . This is set out in Matter Statement 17, Issue 1 Q1. NE agrees
NE	Para 4.45	We suggest that you may wish to rephrase it along the following lines: <i>The zone of influence around a European designated site is the geographical area within</i>	Amend paragraph 4.45 as follows: 4.45 The zone of influence around a European designated site , is the geographical area within

Respondent	Policy / Para	Representation	Proposed amendment
		<p><i>which people will travel to visit it. To keep it to a manageable extent a zone of influence is usually set so as to capture the majority of visits or visitors, rather than every single one. The whole of Thanet District falls within a 6km radius of the SPA boundary and evidence has shown the zone of influence for the site to extend further than this. Therefore residents from all new housing in Thanet have the potential to increase recreational pressure on the SPA and the mitigation approach set out in the SAMM strategy applies to the entire District.</i></p>	<p>which people will travel to visit it. To keep it to a manageable extent a zone of influence is usually set so as to capture the majority of visits or visitors, rather than every single one. Within this zone, an impact on European sites interest can be identified and where any potential impacts need to be avoided or mitigation provided. The whole of the District falls within a 6km radius of the SPA boundary and evidence has shown the zone of influence for the site to extend further than this. , therefore it is reasonable to include the whole of the District within a zone of influence and therefore to apply the mitigation approach set out in the SAMM strategy. Therefore residents from all new housing in Thanet have the potential to increase recreational pressure on the SPA and the mitigation approach set out in the SAMM strategy applies to the entire District.</p>
NE	4.48	Insert Coast so read Thanet Coast Project	<p>Paragraph 4.48 Insert Coast</p> <p>4.48 The Thanet Coast Project has been very successful with the following activities and projects set up to deliver these objectives:-</p>
NE	SP26	<p><i>A financial contribution based on the current tariff in table 8 and any subsequent amendments, is required in perpetuity towards an in perpetuity access management scheme.</i></p>	<p>Policy SP26 reword as follows:</p> <p>All proposals for new residential development will be required to comply with the Strategic Access Management and Monitoring Strategy (SAMM) in order to mitigate against the in-combination effects of new development, through the pathway of recreational pressure on the Thanet Coast SPA and Ramsar site. A financial contribution based on the current tariff in table 8 and any subsequent</p>

Respondent	Policy / Para	Representation	Proposed amendment
			<p>amendments, is required in-perpetuity towards an in perpetuity Access Management Scheme. This will be collected via a S106 payment.</p> <p>This is set out in Matter Statement 17, Issue 1 Q1.</p>
NE	4.50	Paragraph 4.50 – should refer to Natural England’s Standing Advice for protected species only – not sites	<p>Amend paragraph 4.50</p> <p>4.50 Species protected under the Wildlife and Countryside Act, the Protection of Badgers Act, the Habitats Directive or listed in the Natural Environment and Rural Communities Act (Section 41) may be present on sites and would be a material consideration in the assessment of development proposals. Natural England have produced Standing Advice for protected sites and species in relation to planning applications which provide details of the potential existence of protected species, advice on whether survey reports are required, guidance on the survey requirements for protected species and advice on mitigation proposals. Developers should have regard to this advice as appropriate.</p>
KWT NE	SP27	Reference to net gain suggested it in connection with GI01 but think it would be more appropriate in SP27	<p>Add a paragraph after 4.50</p> <p>The government has recently consulted on proposals for the mandatory implementation of net gain for biodiversity via development proposals. The principle of net gain would apply to all new developments that result in a loss of degradation of habitats including buildings. The draft guidance suggests that net gain for biodiversity could be delivered in a variety of ways ranging from avoiding the loss of high quality habitats to on- or off-site habitat</p>

Respondent	Policy / Para	Representation	Proposed amendment
			<p>creation or enhancement of a tariff system to invest in strategically important habitats. Once the consultation has concluded and the Government has issued final guidance it may be necessary to amend the plan to address any new requirements.</p>
NE	SP27	<p>We would advise that SP27 is a key policy to achieving the creation of coherent ecological networks across Thanet District.</p> <p>For future development in Thanet District to deliver for the wider natural environment the designated sites should be acting as reservoirs of species, with Policy SP27 making provision for buffering these, linking them and helping habitats and species to move and expand through the wider environment. High quality designated areas are central to resilient landscape and ecosystems but they are only part of the puzzle. They are a key component in establishing the large core areas and networks that are the building blocks for resilience - providing refugia and stepping stones supporting adaptation to climate change, and for delivering wider ecosystem benefits. Policy SP27 needs to make provision for the key principles for wildlife sites from the Lawton Review (Making Space for Nature, 2010) – bigger, better, more and joined up.</p> <p>We would recommend adding a fifth point to this policy, ‘<i>Mitigating against the loss of any farmland bird habitats</i>’ as we believe this sits better here than under SP24.</p>	<p>Policy SP27 Biodiversity and Geodiversity Assets: add 5th criterion</p> <p>Development proposals will, where appropriate possible, be required to make a positive contribution to the conservation, enhancement and management of biodiversity and geodiversity assets through the following measures:</p> <ul style="list-style-type: none"> i) the restoration / enhancement of existing habitats, ii) the creation of wildlife habitats where appropriate, by including opportunities for increasing biodiversity in the design of new development iii) the creation of linkages between sites to create local and regional ecological networks, iv) the enhancement of significant features of nature conservation value on development sites. v) Mitigating against the loss of any farmland bird habitats

Respondent	Policy / Para	Representation	Proposed amendment
			<p>Sites should be assessed for the potential presence of biodiversity assets and protected species. On sites where important biodiversity assets, including protected species and habitats including SPA functional land, or other notable species, may be present, an ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats. Planning permission will not be granted for development if it results in significant harm to biodiversity and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority.</p> <p>This is set out in Matter 17 Issue 1, however, there is an error in the first sentence as the original text has been left in. it should say where appropriate. It is the Council's intention to correct this at the hearing 17/07/19.</p> <p>Ne notes</p>
NE	4.69	Suggests deleting but perhaps amend to say in addition to SAMM contribution.	<p>Amend paragraph 4.69</p> <p>4.69 The provision of Alternative natural and semi-natural open space on new developments contributes to sustainable development and to the general health and wellbeing of local residents. In addition it can also help to relieve some of the recreational pressure on the coast although this is in addition to any mitigation that may be required through the SAMM. particularly that associated with the impact on protected species as highlighted in the Strategic</p>

Respondent	Policy / Para	Representation	Proposed amendment
NE	SP35	<p>expanded slightly along the following lines:</p> <p><i>“New development must take account of.....opportunities to reduce the impact of climate change on biodiversity and the natural environment by providing space for habitats and species to move through the landscape and for the operation of natural processes, particularly at the coast.”</i></p>	<p>Access Management and Monitoring Plan (SAMM)</p> <p>Amend policy SP35 - Climate Change:</p> <p>New development must take account of:</p> <ol style="list-style-type: none"> 1) respond adapting to climate change by minimising vulnerability and providing resilience to the impacts of climate change through the use of up to date technologies, efficient design and appropriate siting and positioning of buildings; 2) mitigate Mitigating against climate change by reducing emissions and energy demands through the use of up to date technologies; 3) Improving building resilience to climate change through the use of best available technology 3) 4) realise and make best use of available opportunities to reduce the impact of climate change on biodiversity and the natural environment by providing space for habitats and species to move through the landscape and for the operation of natural processes, particularly at the coast. <p>This is set out in Matter Statement 18 Issue 1 Q1.</p>

Chapter 11 – Housing

Respondent	Policy / Para	Representation	Proposed amendment
NE Twizzell	HO8	As stated in our response to the 2015 Preferred Options consultations we would query why this is the only site allocation policy in the Local Plan to require the development to ' <i>address the need to retain and enhance trees and hedgerows for their biodiversity interest</i> ' as we believe it could probably be applied more generally.	This was discussed at the Examination on Hearing Day 6, Matter 6, Issue 5, Q6 and it was agreed that this requirement is quite specific to this particular site as the trees and hedgerows are a strong feature of the full boundary of the site. NE Notes

Chapter 12 - NE and GI

Respondent	Policy / Para	Representation	Proposed amendment
NE Twizzell	Diagram 1 hierarchy of NC designations	Add Thanet coast SSSI and MCZ Correct Ramsar. Hidden in format of triangle	Add Thanet Coast SSSI and MCZ. Correct Ramsar spelling. This is set out in Matter Statement 17 Issue 1 Q7.
NE Twizzell	GI01	Add last clause from GI02 re: connectivity to GI01	Add to the end of policy GI01 The proposed development will, wherever possible and appropriate, include measures to enhance and improve connectivity to designated sites. This is set out in Matter Statement 17 Issue 1 Q9
NE Twizzell	GI03	Add clause re: need outweighing importance	Reword GI03 as follows: At RIGS sites, development which would result in the loss or obstruction of geological features of importance will not only be permitted where a strategic need for the proposed development is identified which outweighs the importance of the locally designated sites and cannot be located elsewhere. This is set out in Matter Statement 17, Issue 1 Q10

Chapter 15 – Climate change

Respondent	Policy / Para	Representation	Proposed amendment
KCC NE	CC02	ADD <i>“where possible, provide multi-functional benefits.”</i> <i>Including benefits for people and wildlife wherever possible”</i>	<p>Policy CC02 add wording:</p> <p>New development is required will be expected to manage surface water resulting from the development using sustainable drainage systems (SUDS) wherever possible. SUDS design, together with a robust long term maintenance plan should be included considered as an integral part of the master master planning and design process for new development and should, wherever possible, incorporate multi-functional benefits for people and wildlife. Developers should demonstrate how the seek and refer to guidance produced by the Lead Local Flood Authority (LLFA) has been taken into account and applied when submitting a planning application for any major development. Approval of for the design and measures to be implemented for the long term maintenance of SUDS will be required prior to development being permitted.</p> <p>This is set out in Matter 18 Issue 2 Q2.</p>
NE	CC03	CONSIDER adding 3) Has considered the potential for impacts on natural habitats through the process of coastal squeeze or otherwise restricting the capacity of the coastline to adjust to sea-level rise and climate change.	<p>Policy CC03 – Coastal Development</p> <p>Proposals for new development within 40 metres of the coastline or clifftop must demonstrate to the satisfaction of the Council that it will not:</p> <ol style="list-style-type: none"> 1) expose people and property to the risks of coastal erosion and flooding for the life of the

Respondent	Policy / Para	Representation	Proposed amendment
			<p>development; or</p> <p>2) accelerate coastal erosion due to increased surface water run off; before planning permission can be granted</p> <p>3) impact on natural habitats through the process of coastal squeeze or otherwise restrict the capacity of the coastline to adjust to sea-level rise and climate change.</p> <p>This is set out in Matter Statement 18 Issue 2 Q4</p>
NE	CC06	<p>ADD:</p> <p><i>Solar parks will need to assess their impact on the Thanet Coast SPA and Ramsar site through the loss of functionally linked land and provide mitigation if required.</i></p>	<p>Policy CC06 – Solar Parks</p> <p>Applications for solar parks will only be permitted if there is no significantly detrimental impact on any of the following:</p> <ol style="list-style-type: none"> 1) Thanet's historic landscapes 2) Visual and local amenity, including cumulative effects 3) Heritage assets and views important to their setting <p>Proposals on agricultural land must demonstrate that the proposal will comply with all of the following:</p> <ol style="list-style-type: none"> 5) Cause minimal disturbance to the agricultural land and 6) Be temporary, capable of removal and reversible, and allow for continued use as such on the remaining undeveloped area of the site. 7) Provide biodiversity enhancements. <p>The need for renewable energy does not automatically override environmental considerations.</p> <p>Solar parks will need to assess their impact on the Thanet Coast SPA and Ramsar site through the loss of functionally linked land and provide</p>

Respondent	Policy / Para	Representation	Proposed amendment
			<p>mitigation if required.</p> <p>This is set out in Matter Statement 18 Issue 3 Q4.</p>

Outstanding Issues:

TDC Notes

Whilst TDC appreciates NE's concern, SP26 is quite explicit that the SAMM is a requirement of all proposals for residential development in order to mitigate against the in-combination effects of new development of recreational pressure on the Thanet Coast SPA and Ramsar site. The provision of new on site green infrastructure has the potential to reduce the number of trips to the coast particularly by dog walkers, particularly as the new strategic developments are inland and access to the coast would involve a car journey. The Council believes this is an added benefit of the provision of suitable onsite green infrastructure to meet the needs of new developments and that the plan is sufficiently clear that this is in addition to the SAMM contribution requirement.

Signed.....A Verrall...

Name ...Adrian Verrall.....

Position...Strategic Planning Manager.....

Date...4 July 2019.....

NE Notes

Paragraph 4.37 In the absence of supporting evidence that this is the case we can agree to disagree. NE is concerned that this confuses the clear requirement of SAMM and the policy pertaining to this and would wish to prevent any confusion to this through the planning process

Signed.....Rebecca E Pearson.....

NameRebecca Pearson.....

Position.....Lead Adviser.....

Date.....04 Jul 2019.....