

Independent Examination of the Thanet Local Plan

Inspectors' Matters, Issues and Questions for Examination

Environment Agency Comments

Matter 15 – Green Infrastructure and Open Space (Policies SP22-SP24, SP29-SP32 and GI04-GI07)

Issue 2 – Landscaping and Green Infrastructure – Policies SP24 and GI06

Q1. What is the justification for listing types of Green Infrastructure in paragraph 4.36? Is this a policy requirement that proposals will be expected to provide? If so, should it be a specific policy requirement? Is the policy effective?

We expressed concern that when Green Infrastructure is listed, authors usually forget that rivers, streams, standing water and wetlands associated with them are GI and often omit them from the lists. This happened here and requires correction.

We would like the list to be removed but readers of the plan benefit from having a definition of GI. Perhaps reference to Natural England green infrastructure typology on page 7 of the *Green Infrastructure Guidance* at <http://publications.naturalengland.org.uk/file/94026> would be preferable?

Q2. What is the justification for requiring a landscape survey under Policy GI06 for all development proposals that require a design and access statement?

We have no comments to make about this requirement.

Q3. What is the justification for requiring developers to demonstrate that adequate arrangements have been made to ensure the continued maintenance of landscaping? Is this necessary for all development proposals, and how have the costs associated with this requirement been taken into account?

We have no comments to make about non-riverine habitats. However, where development occurs near and beside a river i.e. riparian development, long-term management of the riverside is desirable for a number of reasons.

Firstly, rivers in England are now mostly heavily modified and, in most cases, lack the natural elements to ensure that any created habitat in the riparian margin can remain in the required state. This means that the wildlife benefits that a river margin offers can only be maintained if there is long-term management.

If the riparian margin provides a recreation or leisure facility, then, as it ages, long-term management is necessary to ensure that that facility remains in good condition. In addition, as some trees can become dangerous with age, long-term management ensures that they do not threaten human health.

Management also keeps riparian margins in good condition and so can help reduce flood risk. This is another clear human health benefit of long-term management of river margins.