

Dear Adrian,

Canterbury District Local Plan - Draft Infrastructure Delivery Plan (Canterbury CC) Canterbury District Local Plan

Thank you for sending Natural England the above consultation we have the following comments which I hope will be useful, our comments focus on the section regarding the Habitat Regulations mitigation measures.

As you are aware the requirement to comply with the Habitat Regulations is a priority, therefore in order to ensure the delivery of Canterbury's housing numbers it is important that an appropriate delivery mechanism is in place.

Natural England's advice is that we have agreed the appropriate strategic mitigation measures that will avoid a significant impact on the SPAs and the way in which the funds are collected is a planning matter and how this is best achieved we leave that decision to individual LAs. However, there is a need for certainty regarding the ability to collect sufficient funds to deliver the mitigation and ensure that development can proceed and that the LAs comply with the Habitat Regulations. Measures need to be in-perpetuity you should ensure that this is worded appropriately into any core policy so that whatever mechanism comes forward to collect the funds there is a policy hook for this.

Finally we have a detail comment on the wording for the text in the table page 13, for the North Kent Strategy, it currently reads, 'North Kent: proposals for long term monitoring/wardening';

Our detailed comment is: The measures need to be in-perpetuity rather than long term and this is also the case for the Thanet Coast Strategy too. Also the North Kent Strategy is suggesting improvements in green space and potential provision of GI as mitigation so this should be covered in the wording.

Similarly although new green infrastructure is not part of the Thanet Coast Strategy depending on the effectiveness of the current measures, new measures such as GI might be required.

We highlight these issues to ensure that there is flexibility in the proposals and that in-perpetuity measures are picked up.

I hope this advice is helpful and look forward to advising you further should the need arise.

Kind regards
Angela