

Appendix J: Appraisal of Historic and Natural Environment Options

Significant Positive Effect	++	Likely to have a significant positive effects
Minor Positive Effect	+	Likely to have a positive effects
Neutral	0	Neutral
Minor Negative Effect	-	Likely to have negative effects
Significant Negative Effect	--	Likely to have significant negative effects
Uncertain	?	Uncertain
No Relationship	NA	Not applicable/No relationship

NB: where more than one colour/symbol is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

Heritage and the Historic Environment

Issue NE1: How can we protect and enhance our heritage assets?

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SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE1A	0	0	+	0	++	+	NA	NA	++	+/-/?	+/?	++/-/?	NA	++
NE1B	0	0	+/?	0	++/?	+	NA	NA	++/?	+/-/?	+/?	++/-/?	NA	++/?

Commentary:

Likely significant effects

Option NE1A would keep the current Local Plan’s identified World Heritage Site, Buffer Zone and Views, Heritage Assets such as Listed Buildings, Conservation Areas, Shopfronts, Archaeology and Historic Landscapes, Parks and Gardens. Option NE1B would consider views to amend the existing approach. There is uncertainty related to what this may deliver at this stage. However, it is expected that it would help to conserve and enhance assets.

Both Options would work to protect the important natural assets of Canterbury, especially its protected natural sites which is a core objective of SAO3. Historic designations and landscapes are incredibly important sources of biodiversity. Both Options therefore ensure there is land available for Canterbury’s Biodiversity to continue to develop and grow and form natural ecological networks. Both policies would therefore have a positive effect on the attainment of SAO3.

Much of Canterbury’s land is under a Local Landscape designation or higher, with most designations being Areas of High Landscape Value (AHLV) or covered by the Kent Downs Area of Outstanding Natural Beauty. By protecting and enhancing historic assets, Option NE1A would therefore be protecting landscapes and their quality within Canterbury and significantly contribute to SA Objective 5. Option NE1B is likely to have similar effects although that is uncertain. It is common for historic assets, especially parks and gardens and landscapes, to contain important watercourses and waterbodies that are integral to the character and setting of said historical asset. Both Options would therefore have a minor positive effect on the attainment of SAO6.

As has been stated above, both Options afford protection to the heritage assets of Canterbury of which there are many. Both Options would achieve this through protecting all assets within Canterbury that have a degree of heritage significance, such that it should be considered through the planning process. Both Options would therefore have a significant positive effect on SAO9.

Both Options afford protection to Canterbury’s Listed Buildings and wish to see them brought into use again. This could see the creation of a small amount of housing but great uncertainty exists around how likely such an effect is given the difficulties of bringing Listed Buildings back into usefulness after they have suffered disrepair. Additionally, heritage protection can also limit housing growth. Option NE1A and NE1B are therefore likely to have a minor positive and negative effect on the attainment of SAO10 but with considerable uncertainty around the likelihood of this outcome.

Neither Option is concerned with the use of land or soil quality. However, both Options afford protection to historical assets, which often can be locations with high quality soil assets. This is especially true of the historic landscapes (both Options). Both Options are therefore considered to have a minor positive effect on the attainment of SAO11 as they are likely to protect important land and soil resources from inappropriate development to some degree.

Canterbury District is a popular tourist destination, thanks to its status as a cultural heritage designation and *"received an estimated 7.8m visitors generating £491m in economic value and accounting for 10,115 jobs (16% of all employment in the District.)"*¹ Tourism is therefore of considerable importance to Canterbury's economy and the protection of historical assets would ensure Canterbury's status as an important heritage designation would continue. Both Options would therefore have a significant positive effect on the attainment of SAO12. However, there may be impacts on delivery of commercial and employment units so negative effects are also identified. However, there is some uncertainty related to the negative effects.

Both Options would have a positive effect on the attainment of SAO14 by protecting Historical Assets, which included landscapes, from improper development. This ensures the population of Canterbury and the wider Kent region have access to many places to access both nature and the historical past, providing entertainment and healthy recreational activities.

Both Options bare no relationship to SAO7, SAO8 and SAO13.

Mitigation

- Local Plan policies should seek to protect and enhance both designated and non-designated heritage assets.

Assumptions

- None.

Uncertainties

- It is not clear how likely or successful either Option will be at seeing the renovation of Listed Buildings that have the potential to provide housing or how much the Options would protect important soil resources.

¹ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 33.

Issue NE2: How can we support the adaptation of the historic environment to achieve improvements in carbon emissions and energy efficiency?

Issue NE2: How can we support the adaptation of the historic environment to achieve improvements in carbon emissions and energy efficiency?														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE2A	0	0/?	NA	NA	0	NA	NA	NA	0	NA	NA	NA	NA	NA
NE2B	0	+	NA	NA	0	NA	NA	NA	+/-/?	NA	NA	NA	NA	NA

Commentary:
Likely significant effects

Option NE2A seeks to maintain the current policies that govern the design of amendments to historic buildings. Option NE2B seeks to provide more guidance on amending historic buildings, with a focus on providing guidance on retrofitting historic buildings and buildings within conservation areas to improve their energy efficiency and reduce their carbon emissions.

Option NE2A would have no real effects on the air quality as the Option is not seeking to address historical buildings contributions to local air quality or reduce historical buildings emissions and energy efficiency. It would therefore have a neutral effect on the attainment of SAO1 and SAO2. Option NE2B would have a minor positive effect on the attainment of SAO2 due to it seeking to provide clear and better guidance that has an aim on reducing the carbon emissions of historical buildings and improving their energy efficiency.

Option NE2B may have an effect on the historic environment through adaptation or retrofitting of historic buildings but this can only be known through implementation. However, it can be assumed that the policy wording would seek to ensure that negative effects are avoided.

Mitigation

- Local Plan policies should seek to protect and enhance both designated and non-designated heritage assets.

Assumptions

- None.

Uncertainties

- There is some uncertainty over the effect on the historic environment related to the implementation of the policy.

Protection and enhancement of wildlife and biodiversity

Issue NE3 - How should we protect and enhance biodiversity and green and blue infrastructure?

Issue NE3 - How should we protect and enhance biodiversity and green and blue infrastructure?														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE3A	+	+	++	0	++	+	+	NA	+	+/-	?	+/-	+/-	++
NE3B	+	+	++	0	++	++	+	NA	+	+/-/?	?	+/-/?	+/-	++
NE3C	+	+	++	0	++	++	+	NA	+	+/-/?	?	+/-/?	+/-	++

Commentary:

Likely significant effects

Option NE3A seeks to maintain the current policies of the Local Plan, requiring new developments to extend green infrastructure, where feasible, and to provide a 10% biodiversity net gain. Option NE3B has similar aims to Option NE3B but expands its scope to also seeking improvements be made to blue infrastructure (water assets). Option NE3C combines both previous Options and seeks 20% biodiversity net gain.

All the Options would see an improvement within the natural environment/biodiversity of Canterbury as new developments are required to biodiversity net gain and improve the green or blue (Options NE3B & NE3C) infrastructure. The Canterbury District Green Infrastructure Strategy 2018-2031 states the following:

“Ecosystem services are the benefits provided by the natural environment that contribute to making human life possible. They include those things which are essential to life, including providing food, timber and water, soil formation, regulation of water, air quality and pollination, alongside a range of services which contribute to quality of life, including recreation and the inspiration of the natural world. Without a healthy environment, those things which we rely on for life no longer supply us with what we need².”

It is therefore clear that the improvement of the natural environment through the implementation of any of the Options would provide considerable benefits to the attainment of many of the SA Objectives. The natural environment can aid in improving local air quality and improve the resilience of areas to the effects of climate change (primarily flooding), as green and blue infrastructure naturally aid in the management of water. Street trees (which all the Options seek to implement) also help to mitigate against air pollution.³ All Options are therefore considered to have a minor positive effect on the attainment of SAO1 and SAO2.

² CCC (2018), Canterbury District Green Infrastructure Strategy 2018-2031, page 4. Available at: https://www.canterbury.gov.uk/downloads/download/249/green_infrastructure_strategy_document

³ CCC (2018), Canterbury District Green Infrastructure Strategy 2018-2031, page 7. Available at: https://www.canterbury.gov.uk/downloads/download/249/green_infrastructure_strategy_document

All the Options have clear links to SAO3, given they all seek to improve the natural environment and biodiversity of Canterbury. All the Options would therefore have a significant positive effect on the attainment of SAO3, with Option NE3C expected to provide the greatest benefits for seeking to improve blue infrastructure and ensure a 20% biodiversity net gain.

The Options are contingent upon the creation of new developments, therefore does not particularly protect the mineral resources of Canterbury or call for their use. A neutral effect is therefore identified for all Options against SAO4.

The Options would conserve and potentially enhance the designated and non-designated landscapes of Canterbury through improving the natural environment and quality of new developments. As any new development would be required to provide net biodiversity gain as a minimum, this would continue to enhance Canterbury's landscapes, with Options NE3B and NE3C providing further benefits. Key to SAO5, the Options enhancements to biodiversity and the natural environment would help to protect and enhance the wildlife that lives within Canterbury's landscapes. It is therefore considered that all the Options would provide significant positive effects regarding the attainment of SAO5, with Option NE3C providing the most benefits.

Option NE3A does not make mention of protecting blue infrastructure within Canterbury, whilst the other Options do. It would therefore have a minor positive effect on the attainment of SAO6, whilst Options NE3B and NE3C would have a significant positive effect through seeking to enhance the blue infrastructure of Canterbury.

All the Options would have a minor positive effect on the attainment of SAO7 as the natural enhancements/infrastructure they seek to provide would help against flooding and the management of surface water and their drainage. Options NE3B and NE3C would achieve greater positive effects than Option NE3A, due to their inclusion of the provision for improvements to blue infrastructure within Canterbury.

The Options are not directly related to conserving or enhancing the built historical assets of Canterbury, though the environmental benefits the Options would bring are likely to better compliment the character and setting of such historical assets. The Options would help to improve and conserve Historical Landscapes and future Historical Landscapes. It is therefore considered that the Options would have a minor positive effect on the attainment of SAO9.

The Options all place a requirement on developers to meet help address the effects of climate change. This does potentially mean that the net biodiversity gain of the policies, especially the higher requirements of NE3C, could hamper the delivery of new housing within Canterbury. However, a minimum of 10% net gain is due to come into effect nationally. It is noted that places connected by green infrastructure and have access to natural places are often attractive to potential buyers. The Options would therefore have a mix of minor positive and negative effects on the attainment of SAO10.

The Options are contingent upon development, meaning they might not act to stop the loss of important soil resources. However, the Options requiring green infrastructure/natural improvements to a developments surrounding could see important soil resources safeguarded. It is difficult to predict quite how much or how likely the protection of soil resources would occur from these policies or, if such effects occur, how large the benefits would be. An uncertain score is therefore identified against SAO11.

The Options would all provide important green infrastructure to Canterbury, providing ways for its population to traverse the District by foot/cycling. The Options would increase the costs of development within Canterbury (especially Option NE3C) through requiring biodiversity net gain within new developments, the development of green and blue infrastructure (Options NE3B & NE3C) and general enhancing of the environment. Such benefits and disbenefits would also apply to infrastructure developments within Canterbury. The Options would therefore provide a mixture of minor positive and minor negative effects against policy SAO12 and SAO13.

All the Options would have a significant positive effect on SAO14 as they all would see the creation of green infrastructure within Canterbury. The Options would also likely see the creation of green infrastructure within Whitstable, Herne Bay and the central areas of the City of Canterbury itself, which are all areas previously identified as needing their accessibility improved⁴. Options NE3B and NE3C would go further than Option NE3A by seeking the improvement/enhancement of blue infrastructure and would therefore have greater positive effects than Option NE3A.

⁴ CCC (2018), Canterbury District Green Infrastructure Strategy 2018-2031, page 7. Available at: https://www.canterbury.gov.uk/downloads/download/249/green_infrastructure_strategy_document

Mitigation

- None.

Assumptions

- None.

Uncertainties

- It is not clear how these Options will affect the soil resources of Canterbury, as their effects could be very effective in this area and see improvement in such resources or not have much effect.
- Uncertainty related to the potential impact on development viability, especially with more enhanced requirements.

Protecting and enhancing the character of our valued landscapes

Issue NE4 - How should we ensure the Local Landscape Designations (Areas of High Landscape Value) continue to be effective in protecting our valued landscapes?

Issue NE4 - How should we ensure the Local Landscape Designations (Areas of High Landscape Value) continue to be effective in protecting our valued landscapes?														
North Kent Marshes LLD														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE 4A	0	0	+	NA	++	+	NA	NA	+	0/?	NA	+	+	+
NE 4B	0	0	+	NA	++	+	NA	NA	+	0/?	NA	+	+	+

Commentary:**Likely significant effects**

Option NE4A would retain the current North Kent Marshes Local Landscape Designation (LLD) boundary. Option NE4B would rename the North Kent Marshes LLD to Seasalter Marshes LLD (a recommendation of the Canterbury District Local Landscape Designations Reviews and Recommendation 2021⁵). The North Kent Marshes LLD are characterised by their feeling of remoteness and marshlands which extends along the Swale and Thames Estuary⁶.

Marshes can act as a carbon trap and the natural environment does help with the management of local air quality. However, these Options are not focused upon air quality or GHG gas emissions and would therefore have a neutral effect on the attainment of SAO1 and SAO2. The North Kent Marshes LLD are also identified as a Biodiversity Opportunity Area (BOA)⁷. The Options would therefore have a minor positive effect on the attainment of SAO3. Through both options the Council is protecting the important biodiversity assets located within this LLD and allowing for their potential enhancement over time from biodiversity assets being less disturbed.

The Options are naturally related to SAO5 as they continue to provide protection to an important LLD within Canterbury, ensuring its landscapes characteristics and setting are preserved and potentially enhanced. The Options would therefore have a significant positive effect on the attainment of SA Objective 5. The Options would have a minor positive effect on SAO6 as it affords protection to the North Kent Marshes LLD which has water and coastal assets. Through protecting the LLD, the Options would provide protection to the setting of historical assets, both natural and built, that are within the LLD and would therefore have a minor positive effect on SAO9.

Tourism provides a considerable contribution to Canterbury's economy. The Canterbury District "...benefits from an appealing rural and natural environment offering attractive countryside experiences..."⁸ and could be said to "...offers a very attractive natural environment and classic English countryside comprising a number of picturesque villages"⁹. Though the LLD designation holds limited power, as already stated, it would provide protection to the landscapes, biodiversity and setting of Canterbury District, which are core to the appeal of Canterbury District to tourists. The Options would therefore have a minor positive effect on the attainment of SAO12 through protecting important tourist assets. North Kent Marshes LLD has limited recreational opportunities, but it does have the Saxon Shoreway, which is a regionally promoted route for recreation route¹⁰. Through maintaining this LLD the Options would ensure the continued use of the route and have a minor positive effect on SAO14.

Mitigation

- None identified.

Assumptions

- None identified.

Uncertainties

- None identified.

⁵ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 20.

⁶ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 20.

⁷ LUC (2020), Canterbury Landscape Character Assessment and Biodiversity Appraisal, page 27.

⁸ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 108.

⁹ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 35.

¹⁰ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 21.

Issue NE4 - How should we ensure the Local Landscape Designations (Areas of High Landscape Value) continue to be effective in protecting our valued landscapes?														
Wantsum Channel LLD														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE4C	0	0	+	NA	++	+	NA	NA	+	0/?	NA	+	+	++
NE4D	0	0	+	NA	++	+	NA	NA	+	0/?	NA	+	+	++

Commentary:

Likely Significant Effects

Option NE4C would retain the current boundary of the Wantsum Channel LLD. Option NE4D would amend the Wantsum Channel LLD boundary to align with the low water mark and exclude development within it. The Wantsum Channel LLD are characterised by marshland and low-lying flat agricultural landscape and the former Wantsum Channel¹¹. Marshes can act as a carbon trap and the natural environment, which can aid with the management of local air quality. However, these Options are not focused upon air quality or greenhouse gas emissions and would therefore have a neutral effect on the attainment of SAO1 and SAO2.

Through protecting the Wantsum Channel LLD, the Council is protecting the important biodiversity assets located within this LLD and allowing for their potential enhancement over time from biodiversity assets being less disturbed. There is potential for the continued management of this LLD to allow for the restoration of coastal marshland in the northern part of it and creating a new landscape and ecological resource¹². The Options would therefore have a minor positive effect on the attainment of SAO3. The Options are naturally related to SAO5 as they continue to provide protection to an important LLD within Canterbury and Option NE4D (Preferred Option) could see the creation of a new important landscape and biodiversity area in the future through inclusion of the low water mark. The Options would therefore have a significant positive effect on the attainment of SAO5. The Options would have a minor positive effect on SAO6 as it affords protection to the Wantsum Channel LLD which has water and coastal assets.

Through protecting the Wantsum Channel LLD, the Options would provide protection to the setting of historic assets, both natural and built, that are within the LLD and would therefore have a minor positive effect on SAO9. The continued protection of the Wantsum Channel LLD would provide further protection to the Roman fort at Reculver and a 12th century church's setting¹³.

¹¹ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 25.

¹² LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 26.

¹³ LUC (2020), Canterbury Landscape Character Assessment and Biodiversity Appraisal, page 55.

Tourism provides a considerable contribution to Canterbury's economy. The Canterbury District "...benefits from an appealing rural and natural environment offering attractive countryside experiences..."¹⁴ and could be said to "...offers a very attractive natural environment and classic English countryside comprising a number of picturesque villages"¹⁵. Though the LLD designation holds limited power, as already stated, it would provide protection to the landscapes, biodiversity and setting of Canterbury District, which are core to the appeal of Canterbury District to tourists. The Options would therefore have a minor positive effect on the attainment of SAO12 through protecting important tourist assets.

The Options would have a significant positive effect on SAO14 through the continued safeguarding of an LLD that has a considerable number of Public Rights of Way running through it, the Saxon Shore Way and Reculver Country Park¹⁶.

Mitigation

- None identified.

Assumptions

- None identified.

Uncertainties

- None identified.

Issue NE4 - How should we ensure the Local Landscape Designations (Areas of High Landscape Value) continue to be effective in protecting our valued landscapes?

North Downs LLD

SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE 4E	0	0	+	NA	++	0	NA	NA	+	NA	NA	+	+	++
NE 4F	0	0	+	NA	++	0	NA	NA	+	NA	NA	+	+	++

¹⁴ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 108.

¹⁵ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 35.

¹⁶ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 27.

Commentary:**Likely significant effects**

Option NE4E would seek to keep the North Downs LLD as is currently shown within the Local Plan. Option NE4F modifies the North Downs LLD to remove any of the boundary covered by the Kent Downs AONB as the AONB has a greater designation than an LLD, whilst also removing a small area allocated for development and increasing the area slightly to take it to the edge of the Great Stour.

The North Downs LLD are characterised by the Kent Downs AONB¹⁷ and though there are pockets of land outside of this AONB. These pockets of land are characterised as:

"The western parcel is contained by the Great Stour Valley to the north-west, the Canterbury AHLV boundary to the north-east (defined by woodland edges), and the AONB to the south. The eastern parcel is contained by the A257 to the north, the district boundary to the east, the Nailbourne and Little Stour Valley to the west and the AONB to the south"¹⁸.

The natural environment does help with the management of local air quality and emissions. However, these Options are not focused upon air quality or greenhouse gas emissions and would therefore have a neutral effect on the attainment of SAO1 and SAO2. Though diminished in size, this LLD would still afford protection to the biodiversity assets within it. The LLD's new boundaries under Option NE4F are fragmented and work needs to be done to sustain these boundaries, especially where they border the Kent Downs AONB. The Options would therefore still have a minor positive effect on the attainment of SAO3.

The Options are naturally related to SAO5 as they continue to provide protection to an important LLD within Canterbury, ensuring its landscapes characteristics and setting are preserved and potentially enhanced. The Options would therefore have a significant positive effect on the attainment of SAO5. There will be water assets within the North Downs LLD that are protected by these Options. However, the scale of these water assets is not known and therefore a neutral effect is anticipated against SAO6.

Through protecting the North Downs LLD, the Options would provide protection to the setting of historical assets, both natural and built, that are within the LLD and would therefore have a minor positive effect on SAO9. The continued protection of the North Downs LLD would provide further protection to the Grade I Adisham Church Listed Building, a WWII pillbox and houses within the settlement of Adisham¹⁹.

Tourism provides a considerable contribution to Canterbury's economy. The Canterbury District *"...benefits from an appealing rural and natural environment offering attractive countryside experiences..."*²⁰ and could be said to *"...offers a very attractive natural environment and classic English countryside comprising a number of picturesque villages"*²¹. Though the LLD designation holds limited power, as already stated, it would provide protection to the landscapes, biodiversity and setting of Canterbury District, which are core to the appeal of Canterbury District to tourists. The Options would therefore have a minor positive effect on the attainment of SAO12 through protecting important tourist assets.

The Options would have a significant positive effect on SAO14 through the continued safeguarding of an LLD that has a considerable number of Public Rights of Way running through it, which connect with and run alongside the Kent Downs Way and North Downs Way²².

There is no relationship between these Options and SAO4, SAO7, SAO8, SAO10, SAO11 and SAO13.

¹⁷ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 36.

¹⁸ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 36.

¹⁹ LUC (2020), Canterbury Landscape Character Assessment and Biodiversity Appraisal, page 38.

²⁰ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 108.

²¹ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 35.

²² LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 38.

Mitigation

- None identified.

Assumptions

- None identified.

Uncertainties

- None identified.

Issue NE4 - How should we ensure the Local Landscape Designations (Areas of High Landscape Value) continue to be effective in protecting our valued landscapes?**Blean Woods LLD**

SA Objective	SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA010	SA011	SA012	SA013	SA014
Option	SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA010	SA011	SA012	SA013	SA014
NE4G	0	0	+	NA	++	0	NA	NA	++	0	+	+	+	++
NE4H	0	0	+	NA	++	0	NA	NA	++	0	+	+	+	++
NE4I	0	0	+	NA	++	0	NA	NA	++	0	+	+	+	++
NE4J	0	0	+	NA	++	0	NA	NA	++	0	+	+	+	++
NE4K	0	0	+	NA	++	0	NA	NA	++	0	+	+	+	++

Commentary:**Likely significant effects**

Option NE4G would retain the current Blean Woods LLD boundary. Options NE4H to NE4K (Preferred Option) would amend the boundary to align it with the landscape (valley floor), remove a solar farm and include the woods of Buckwell Wood, Kemberland Wood and Little Hall Wood, with each of these Options have minor differences in where the boundary would be drawn. The Options altering the boundary are bringing in land predominantly comprised of farmland, which is a departure from the Blean Woods LLDs original nature. Option NE4K includes a provision that new development within close proximity to the re-drawn Blean Woods LLD boundary would need to have regard for the special characteristics and sensitivities of the area.

The Blean Woods is an area of woodland within Canterbury that is predominantly surrounded by farmland. Blean Woods rests on the clay hills between the City of Canterbury to the south and the coast to the north²³. The Blean Woods has been identified for its high level of tranquillity and the Blean Woods LLD works to maintain this tranquillity²⁴. Many of Canterbury's settlements and remote dwellings have access to the Blean Woods thanks to PRoW and long views to these woods has been identified as a valuable and sensitive benefit within Canterbury²⁵.

The natural environment does help with the management of local air quality and emissions. However, these Options are not focused upon air quality or greenhouse gas emissions and would therefore have a neutral effect on the attainment of SAO1 and SAO2.

The continuation of the Blean Woods LLD would continue to afford some protection to the biodiversity assets. Woodlands are often places that house a considerable amount of biodiversity assets and woodlands act as natural biodiversity corridors. An expansion to the Blean Woods LLD would ensure more land (predominantly farmland) has its biodiversity protected and the Local Plan places great importance on the protection of the Blean Woods LLD. The Options would therefore have a minor positive effect on the attainment of SAO3.

The Options are naturally related to SAO5 as they continue to provide protection to an important LLD within Canterbury and Option NE4D could see the creation of a new important landscape and biodiversity area in the future. The Options would therefore have a significant positive effect on the attainment of SAO5. There will be water assets within the Blean Woods LLD that are protected by these Options. However, the scale of these water assets is not known and therefore a neutral effect is anticipated against SAO6.

The Blean Woods is an extremely important natural asset. Over half of it is designated SSSI and one third as a SAC (East Blean Wood, Ellenden Wood and Blean Woods NNR)²⁶. The Options would therefore continue to protect an important natural historical asset and its characteristics and setting (especially Option NE4K). The Options are considered to therefore have a significant positive effect on the attainment of SAO9.

Tourism provides a considerable contribution to Canterbury's economy. The Canterbury District "...benefits from an appealing rural and natural environment offering attractive countryside experiences..."²⁷ and could be said to "...offers a very attractive natural environment and classic English countryside comprising a number of picturesque villages"²⁸. Though the LLD designation holds limited power, as already stated, it would provide protection to the landscapes, biodiversity and setting of Canterbury District, which are core to the appeal of Canterbury District to tourists. The Options would therefore have a minor positive effect on the attainment of SAO12 through protecting important tourist assets.

The Blean Woods have considerable recreational value. PRoWs and natural and built access tracks/routes connect Blean Woods to its surroundings, offering considerable opportunities for many outdoor recreational activities. The Wildlife Trust, Forestry England and RSPB all provide car parking and other facilities in order to make the Blean Woods more accessible. The Options would therefore have a significant positive effect on SAO14 through continuing to protect an important recreation resource.

Mitigation

- None identified.

Assumptions

- None identified.

Uncertainties

²³ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 30.

²⁴ LUC (2020), Canterbury Landscape Character Assessment and Biodiversity Appraisal, page 35.

²⁵ LUC (2020), Canterbury Landscape Character Assessment and Biodiversity Appraisal, page various.

²⁶ LUC (2021), Canterbury District Local Landscape Designations Reviews and Recommendations, page 32.

²⁷ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 108.

²⁸ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 35.

- None identified.

Issue NE4 - How should we ensure the Local Landscape Designations (Areas of High Landscape Value) continue to be effective in protecting our valued landscapes?

Stour Valley landscape

SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE4L	0	0	+/?	NA	++/?	+/?	0	NA	NA	0	+	+/?	+	+/?
NE4M	0	0	+	NA	++	+	0	NA	NA	0	+	+	+	+

Commentary:

Likely significant effects

Option NE4L would seek to create an LLD at Stour Valley Floodplain (East) or a descriptive policy protecting this area. Option NE4M (Preferred Option) would retain the current policy coverage of the Local Plan and would not create a new LLD or descriptive policy due to the Stour Valley Floodplain benefitting from considerable protection through Special Protection Area (SPA), Special Areas of Conservation (SAC) and SSSI designations. The Stour Valley Floodplain is also primarily comprised of land identified as being within Flood Risk Zone 2 and 3 and are therefore protected by national flood risk policies that requires developments to avoid areas at high risk of flooding.

The Stour Valley Floodplain (East) already benefits from considerable national and international protection. Therefore, it is difficult to know how much of an additional benefit that designation as an LLD (Option NE4L) would bring. Option NE4L would designate the area as an LLD and could potentially provide some further, minor protections to the area’s biodiversity, landscapes, heritage and recreational use. However, the Preferred Option (NE4M) would still see the Stour Valley Floodplain (East) area protected through relying upon more important designations than a LLD designation can provide (e.g. Stodmarsh SPA, SAC and SSSI).

It is considered that both Options would have a minor positive effect on SAO3 and SAO6 as both would protect important biodiversity assets and the important water resources of the area, of which there are many. The Options would also have a minor positive effect in terms of SAO12 and SAO14 through safeguarding an area that is located close to key settlements within Canterbury, contributing to the attractiveness of Canterbury as a place to visit and enjoy for recreation. Both Options would have a significant positive effect on SAO5 through protecting the Stour Valley Floodplain (East)s setting and character, protection local landscapes. These scores also have an element of uncertainty regarding NE4L as it could have unforeseen positive effects (such as the designating of the area as an LLD adding to local pride/appreciation of the area).

Mitigation

- None.
- Assumptions**
- None identified.
- Uncertainties**
- Option NE4L could provide important benefits that cannot be anticipated or quantified.

Issue NE4 - How should we ensure the Local Landscape Designations (Areas of High Landscape Value) continue to be effective in protecting our valued landscapes?

Landscape currently protected under Canterbury AHLV

SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE4N	0	0	+	NA	++	0	NA	NA	+/?	?	NA	++/?	+	+
NE4O	0	0	+	NA	++/?	0	NA	NA	++/?	?	NA	++/?	+	+

Commentary:

Likely Significant Effect

Option NE4N retains the boundary of the Canterbury AHLV but not as heritage or landscape designation but would work to emphasise the importance of both aspects within Canterbury City. Option NE4O seeks to delete the boundary and LLD but put in place a criteria based policy to protect Canterbury City and its surroundings from inappropriate development. The rationale behind Option NE4O is that the landscapes of Canterbury City and its immediate surroundings are not of sufficient quality to justify a landscape designation and a criteria based policy protecting these areas would work better and protect them from inappropriate development.

Landscapes contain vital biodiversity assets that are also important for the setting and character of the landscapes they reside within. The protections afforded by these Options would therefore have a minor positive effect on SAO3. Both options would have a significant positive effect on the attainment of SAO5 due to their focus on protecting local landscapes around Canterbury.

Option NE4N wishes to re-cast the Canterbury AHLV to also focus on the historic environment. Similarly, Option NE4O also makes mention of a need to protect the historic setting of Canterbury City. The historic environment is incredibly important to the setting and character of an area. These policies are seeking to protect the historic environment to ensure Canterbury City's landscapes are maintained (rather than protect historic assets because of their historic importance). Both Options would therefore have a positive effect on the attainment of SAO9, though for Option NE4O this cover potentially be significant.

Tourism provides a considerable contribution to Canterbury's economy. The Canterbury District "...benefits from an appealing rural and natural environment offering attractive countryside experiences..."²⁹ and could be said to "...offers a very attractive natural environment and classic English countryside comprising a number of picturesque villages"³⁰. Both Options would work to protect the landscapes of Canterbury City and its surroundings (in the case of Option NE4O). Canterbury City is an incredibly important tourist attraction not just for Canterbury District but for Kent and the UK as it is a UNESCO World Heritage Site, featuring a castle, five museums and the Canterbury Tales attraction alongside many other historical assets and tourist attractions³¹. Therefore, these Options would both have a significant positive effect by providing further protection to Canterbury City' historical, landscape and natural assets that all form elements that make it a place for tourists to visit. However, the designation or strict criteria may impact on broader economic growth or employment land delivery. This is uncertain, especially for Option NE4O.

Access to high quality recreational areas can often encourage people to take up healthier lifestyles. Both Options would work to protect areas of high recreational value for walking/cycling through protecting Canterbury City's landscape. Canterbury City benefits from many PRoW and local walks in and around it. Both Options would therefore have a positive effect on SAO14.

There is potential for effects on housing delivery but this is uncertain.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The exact criteria based approach that would be outlined.
- The effect on housing delivery is uncertain.

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?														
Approach to the types of development(s) acceptable within the Green Gaps														
SA Objective	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13	SAO 14

²⁹ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 108.

³⁰ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 35.

³¹ CCC (2020), Canterbury Economic Development and Tourism Study Final Report, page 34.

Option														
NE5A	0	0	+	NA	+/-	NA	0	NA	+/-	-	+/-/?	+/-	NA	++
NE5B	0	0	+/?	NA	+/-	NA	0	NA	+/-	-	+/-/?	+/-	NA	++

Commentary:

Likely significant effects

These Options are concerned with maintaining the existence of Green Gaps, which are a local designation that seek to ensure built up areas to not merge with other built up areas to maintain their uniqueness and character (preventing these areas from coalescing together to form one big built up area)³². Both Options are overarching in their goals rather than governing a specific Green Gap. Option NE5A would continue the current approach of the Local Plan in terms of how Green Gaps are managed. Only development that has a strong recreational/sports use would be acceptable, with potential for educational developments at the Green Gap between Herne Bay and Whitstable. Option NE5B seeks to expand the types of development allowed within Green Gaps to include other community infrastructure and health infrastructure. Such development would be subject to strict criteria in terms of their design and layout to protect the distinctive character of Green Gaps.

Both Options would see the creation of some small scale development, with Option NE5B seeing the potential creation of development not as focused on recreation/sporting activities that could generate larger air quality effects and greenhouse gases. Despite this, the air quality impacts of these Options and the greenhouse gas emissions produced from any buildings or traffic traveling to them would be incredibly small. The Options could even see the creation of parks/gardens that help local air quality and the management of greenhouse gases, though on a very small scale. It is therefore considered that both Options would have a neutral effect on the attainment of SAO1 and SAO2.

Both Options would see the creation of new very specific developments within Green Gaps. Green Gaps are important for forming biodiversity corridors, ensuring local biodiversity does not have to travel through built up areas or become fragmented. The creation of new development within this area would therefore potentially compromise this element of Green Gaps, with Option NE5B allowing for a wider range of development. However, and any developments created by either Option would be small scale. Both Options are, at their core, seeking to protect the distinctiveness of Green Gaps and therefore the biodiversity of these Green Gaps. Similarly, both Options would work to protect local landscapes and their character and setting, ensuring any developments they grant are suitable and complimentary, though any building might detract slightly from local landscapes despite good design. These Options would also work to protect the character and setting of local historical natural assets (primarily landscapes) and built historical assets. The buildings created by the Options would contribute a small number of jobs to the Canterbury District, though the blocking of any residential development could hamper the economic potential of Canterbury. It is therefore considered that the Options would have a minor positive and minor negative effect on SAO5, SAO9 and SAO12.

Both Options do not allow the creation of residential development within Green Gaps, only allowing for very specific developments to be created. The Options would therefore have a minor negative effect on the attainment of SAO10. For land use (SA Objective 11), the Preferred Option may encourage the loss of further land to development, although the overarching principles would remain. A mixture of minor positive and negative effects are assessed both options.

Both Options would have a significant positive effect on SAO14 as they will both potentially create new sporting/recreational facilities, with Option NE5B also potentially allowing for the creation of new health services that would aid the health and community cohesion of Canterbury’s population. These benefits may be further enhanced under the Preferred Option.

³² CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 3.

<p>Mitigation</p> <ul style="list-style-type: none"> None. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> None.
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Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?														
Green Gap between Sturry and Westbere														
SA Objective	SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA010	SA011	SA012	SA013	SA014
Option	SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA010	SA011	SA012	SA013	SA014
NE5C	NA	NA	+	NA	+	NA	NA	NA	0	0	+	NA	NA	+
NE5D	NA	NA	+	NA	+	NA	NA	NA	0	0	+	NA	NA	+

Commentary:

Likely significant effects

Option NE5C would retain the current boundary of the Sturry and Westbere Green Gap. Option NE5D would make a minor amendment to the Sturry and Westbere Green Gap to remove an existing building from it. The difference between the two Options is therefore negligible. The Sturry and Westbere Green Gap is approximately 15.3ha of primarily green space with a residential building to the east, which would be removed following the implementation of Option NE5D³³.

The Sturry and Westbere Green Gap, being primarily comprised of green space, acts as an important space for local biodiversity. The space has become a key part of the landscape and the setting of nearby historical assets. The minor amendment to the Green Gaps boundary proposed by NE5D would not compromise the Green Gaps benefits to the local area. The Green Gap also acts as an important area for recreational activity and accessing nature. It is therefore considered that both Options would have a minor positive effect on SA03, SA05, SA0 11 and SA014.

Mitigation

- None.

Assumptions

- None.

³³ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 11.

Uncertainties														
None.														
Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?														
Green Gap between Sturry and Hersden														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE5E	NA	NA	+	NA	+	+	NA	NA	0	0	+	NA	NA	+
NE5F	NA	NA	+	NA	+	+	NA	NA	0	0	+	NA	NA	+
Commentary:														
Likely Significant Effects														
<p>Option NE5E would see the boundary of the Sturry and Hersden Green Gap remains the same as in the current Local Plan. Option NE5F would see the boundary changed to exclude a garage that is currently covered by the Sturry and Hersden Green Gap boundary. It is considered that there are no significant differences between the two Options. The Sturry and Hersden Green Gap contains two ponds and is primarily comprised of 11.2ha of green space with trees³⁴.</p> <p>The Sturry and Hersden Green Gap, being primarily comprised of green space with intermittent groups of trees acts as an important space for local biodiversity. The space has become a key part of the landscape and the setting of nearby historical assets. The minor amendment to the Green Gaps boundary proposed by NE5F would not compromise the Green Gaps benefits to the local area. The ponds within the Green Gap act as an important source of water for local biodiversity and allows for a greater diversity of the biodiversity within it. The Green Gap also acts as an important area for recreational activity and accessing nature. It is therefore considered that both Options would have a minor positive effect on SAO3, SAO5, SAO6, SAO11 and SAO14.</p>														
Mitigation														
<ul style="list-style-type: none"> None. 														
Assumptions														
<ul style="list-style-type: none"> None. 														
Uncertainties														
<ul style="list-style-type: none"> None. 														

³⁴ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 11.

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?														
Green Gap between Herne Bay and Whitstable														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE5G	NA	+	++	NA	++	+	NA	NA	+	-/?	++	-/?	NA	++
NE5H	NA	+	++	NA	++	+	NA	NA	+	-/?	++	-/?	NA	++

Commentary:

Likely significant effects

Option NE5G would amend the boundary of the Herne Bay and Whitstable Green Gap so that it does not include portions of land that are not identified as open countryside. Option NE5H would keep the boundary of the Herne Bay and Whitstable Green Gap the same. The differences between the Options are very minor. The Herne Bay and Whitstable Green Gap is characterised as being approximately 263.8ha in size with a mixture of open fields, green spaces and playing fields³⁵. A large variety of built environment elements also exist within the Green Gap, which range from a solar farm to waste treatment works and dispersed residential dwellings (to name but a few of the built environment elements within this Green Gap)³⁶.

The Herne Bay and Whitstable Green Gap, being primarily comprised of green space, acts as an important space for local biodiversity. The space has become a key part of the landscape and the setting of nearby historical assets. The minor amendment to the Green Gaps boundary proposed by NE5G would not compromise the Green Gaps benefits to the local area. The ponds and coastline within the Green Gap act as an important source of water for local biodiversity and allows for a greater diversity of biodiversity within it. The Green Gap also acts as an important area for recreational activity and accessing nature. It is therefore considered that both Options would have a positive effect on SAO6 and SAO9 with significant positive effect on SAO3, SAO5, SAO11 and SAO14 due to all the benefits mentioned and due to the sheer size of the Green Gap magnifying these benefits.

Minor negative effects are assessed for housing (SA 10) and the economy (SA Objective 12) due to the retention of the Green Gap under each option and the potential impact on the ability to develop housing or employment within the area. However, this is uncertain to some extent dependent on whether the area would be suitable in other respects to accommodate any new development, and therefore the extent to which the designation affected the achievement of these objectives. This will need to be considered during the plan preparation process when determining potential land allocations.

Mitigation

- None.

³⁵ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 10.

³⁶ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 10.

<p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The extent to which designation may affect the ability to deliver housing and commercial development to meet local needs.

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?														
Green Gap between Sturry and Broad Oak														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE5I	NA	NA	+	NA	+	NA	NA	NA	+	0	+	0	NA	+
NE5J	NA	NA	+	NA	+	NA	NA	NA	+	0	+	0	NA	+

Commentary:

Likely significant effects

Option NE5I would see an amendment to the Sturry and Broad Oak Green Gap boundary such that it no longer includes several developments that are proposed as part of the Broad Oak strategic site. Option NE5J would retain the current boundary. It is considered that the differences between these Options are minor. The Sturry and Broad Oak Green Gap is characterised as being approximately 2.9ha of primarily open field and green space with some trees³⁷. With the strategic site at Broad Oak, this Green Gap is even more important to ensure two built environments do not coalesce.

The Sturry and Broad Oak Green Gap, being primarily comprised of green space, acts as an important space for local biodiversity. The space has become a key part of the landscape and the setting of nearby historical assets. The Sturry and Broad Oak Green Gap’s benefits to local landscape is expected to become even more important as the strategic site at Broad Oak is developed to ensure two built environments do not coalesce and result in a fundamental change in the landscape. The minor amendment to the Green Gaps boundary proposed by NE5I would not compromise the Green Gap’s benefit to the local area. The Green Gap also acts as an important area for recreational activity and accessing nature. It is therefore considered that both Options would have a minor positive effect on SAO3, SAO5, SAO9, SAO11 and SAO14.

Mitigation

- None.

³⁷ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 11.

<p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> None.

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?

Green Gap between Canterbury and Tyler Hill

SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE5K	NA	NA	+	NA	+	NA	NA	NA	+	0	NA	0	NA	+
NE5L	NA	NA	+	NA	+	NA	NA	NA	+	0	NA	0	NA	+

Commentary:

Likely significant effects

Option NE5K proposes to potentially expand the boundary of the Canterbury and Tyler Hill to encompass some small portions of land that might aid the Green Gap in preventing two built environments from coalescing. Option NE5L proposes to not change the boundary. Whilst there is merit in expanding the border to potentially prevent two built environments from coalescing, the two Options are considered to have extremely similar effects as the Green Gap in either state would continue to prevent coalescence. The Canterbury and Tyler Hill Green Gap comprises approximately 5.5ha of woodland, fields and a pond³⁸. The Green Gaps that keep Canterbury City from absorbing its surrounding villages are important to ensuring said villages retain this independent feel.

The Canterbury and Tyler Hill Green Gap, being primarily comprised of green space, acts as an important space for local biodiversity. The space has become a key part of the landscape and the setting of nearby historical assets. The Canterbury and Tyler Hill Green Gap’s benefits to local landscape is important as since it is a Green Gap associated with Canterbury City, it works to prevent the City from expanding and incorporating outlying villages and dwellings. The minor amendment to the Green Gaps boundary proposed by NE5K would not compromise the Green Gap’s benefit to the local area and could see the Green Gap better able to keep Canterbury City separate from surrounding villages and dwellings. The Green Gap also acts as an important area for recreational activity and accessing nature. It is therefore considered that both Options would have a minor positive effect on SAO3, SAO5, SAO9 and SAO14.

Mitigation

- None.

³⁸ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 12.

<p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> None.

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?

Green Gap between Canterbury and Bridge

SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE5M	NA	+	++	NA	++	+	NA	NA	++	-/?	++	-/?	NA	++
NE5N	NA	+	++	NA	++	+	NA	NA	++	-/?	++	-/?	NA	++

Commentary:

Likely significant effects

Option NE5M considered the potential for adjusting the Canterbury and Bridge Green Gap boundary, reducing it to not incorporate some areas identified as not being open countryside. Option NE5N would retain the current boundaries. The difference between these Options is considered to be minor. The Canterbury and Bridge Green Gap is characterised by being approximately 282.7ha of open field, green spaces and woodland with various built environment elements such as dwellings, farm buildings and allotments³⁹. This Green Gap therefore works as a large and important break between Canterbury City and some of its surrounding settlements.

The Canterbury and Bridge Green Gap, being primarily comprised of open/green space, acts as an important space for local biodiversity. This Green Gap, thanks to its considerable size, works to support a wide range of ecological assets, with its woodlands/trees providing important safe spaces for creatures. The space has become a key part of the landscape and the setting of nearby historical assets, especially given its size. The minor amendment to the Green Gaps boundary proposed by NE5M would not compromise the Green Gaps benefits to the local area. The Green Gap also acts as an important area for recreational activity and accessing nature. It is therefore considered that both Options would have a significant positive effect on SAO3, SAO5, SAO9, SAO11 and SAO14 due to all the benefits mentioned and due to the sheer size of the Green Gap magnifying these benefits.

Minor negative effects are assessed for housing (SA 10) and the economy (SA Objective 12) due to the retention of the Green Gap under each option and the potential impact on the ability to develop housing or employment within the area. However, this is uncertain to some extent dependent on whether the area would be suitable in other respects to accommodate any new development, and therefore the extent to which the designation affects the achievement of these objectives.

³⁹ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 12.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The exact changes that could be proposed to the Green Gap.

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?

Green Gap between Canterbury and Sturry

SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE5O	NA	+	++	NA	++	+	+/?	NA	++	0/?	+	0	+	++
NE5P	NA	+	++	NA	++	+	+	NA	++	0	+	0	+	++

Commentary:

Likely significant effects

Option NE5O considers reducing the Canterbury and Sturry Green Gap so that it does not cover some areas that are not considered open countryside. Option NE5P would retain the current boundary. The two Options are considered to have similar effects. The Canterbury and Sturry Green Gap is characterised as being approximately 25.7ha of open fields and green spaces with some playing fields. The River Stour also exists within the Green Gap. There are some built environment elements within the Green Gap, primarily comprising dwellings, a wastewater treatment works, railway line and some commercial/employment space, which has been granted by recent planning applications across the Green Gap⁴⁰. Reaffirming the importance of the Green Gap through these Options is required to ensure more if it is not lost to development without considerable justification.

The Canterbury and Sturry Green Gap, being primarily comprised of open/green space, acts as an important space for local biodiversity. This Green Gap, thanks to its considerable size, works to support a wide range of ecological assets, with the River Stour acting as an important waterway and key natural asset to many species. The space has become a key part of the landscape and the setting of nearby historic assets, especially given its size. The minor amendment to the Green Gaps boundary proposed by NE5O would not compromise the Green Gaps benefits to the local area. The Green Gap also acts as an important area for recreational activity and accessing nature. It is noted that parts of the Green Gap have been compromised by development in recent years and there is a need to ensure that this Green Gap is not slowly eroded over time.

⁴⁰ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 10.

It is therefore considered that both Options would have a significant positive effect on SAO3, SAO5, SAO9 and SAO14 due to all the benefits mentioned and due to the sheer size of the Green Gap magnifying these benefits.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The exact changes that could be proposed to the Green Gap.

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?

Green Gap between Blean and Rough Common

SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE5Q	NA	NA	+	NA	+	NA	NA	NA	+	0/?	+	NA	NA	+
NE5R	NA	NA	+	NA	+	NA	NA	NA	+	0	+	NA	NA	+

Commentary:

Likely significant effects

Option NE5Q considers reducing the Blean and Rough Common Green Gap so that it no longer covers some areas no longer considered to be open countryside. Option NE5R (Preferred Option) would retain the current boundary. It is considered that there are minor differences between the Options. The Blean and Rough Common Green Gap is characterised as being approximately 7.3ha that is used for many uses, primarily playing fields and the Kent Community Oasis gardens⁴¹. The Green Gap is therefore less wild in appearance as it is comprised of curated gardens and grasses (the playing fields).

The Blean and Rough Common Green Gap provides an important place for recreational activity by providing places for sporting activities and leisure walking/cycling. The curated gardens of the Kent Community Oasis gardens are important to the character and setting of local landscapes and historic assets. The area is well connected being a Green Gap designed to incorporate sporting

⁴¹ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 11.

and community gardens. The Green Gap does comprise areas of open countryside, ensuring it is an important area for biodiversity as are the curated gardens of the Kent Community Oasis gardens. It is therefore considered that both Options would have a minor positive effect on SAO3, SAO5, SAO9 and SAO14.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The exact changes that could be proposed to the Green Gap.

Issue NE5 - How should we ensure our approach to Green Gaps continues to remain effective?

New Green Gaps

SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
	Option													
NE5S	+	+	++/?	+	++/?	+	+	NA	++/?	--/?	++	--/?	+	++
NE5T	+	+	++	+	++	+	+	NA	++	-/?	++	-/?	+	++

Commentary:

Likely significant effects

Despite the Green Gaps and Local Green Spaces Review (2021) not recommending any new green gaps, Option NE5S would allow for the potential for new Green Gaps to be created but does not specify where they would be. Option NE5T (Preferred Option) would not consider the creation of new Green Gaps necessary and will continue the current Local Plan's approach.

There is a considerable element of uncertainty regarding any of the scores associated with Option NE5S as it is not clear where Green Gaps would be created within the Canterbury District given the current coverage of Green Gaps. The creation of new Green Gaps, depending on their size, could provide enhanced significant positive effects on SAO3, SAO5, SAO9 through protecting important open/green space from development. This would conserve local biodiversity, landscapes and the setting and character of nearby historic assets. However, the creation of new Green Gaps would remove land from potentially being developed, possibly hampering residential development and the growth of the Canterbury District economy and therefore the Option could have a significant negative effect on SA10 and SAO12 (dependent on size and location).

Option NE5T is proposing to take no action and rely on the already identified Green Gaps. This is considered to positively support a number of objectives and with greater certainty as the effects. With regards to the effects of NE5T, there is uncertainty about the potential for effects on housing and economy, dependent on the delivery of development outside of the Green Gaps.

<p>Mitigation</p> <ul style="list-style-type: none"> • None. <p>Assumptions</p> <ul style="list-style-type: none"> • None. <p>Uncertainties</p> <ul style="list-style-type: none"> • The exact location and extent of any potential new Green Gaps. • The potential impact on housing and commercial development.
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Issue NE6 - How should we manage outdoor lighting to support tranquility?

Issue NE6 - How should we manage outdoor lighting to support tranquility?														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE6A	~	+	+	NA	++	NA	NA	NA	+	0	NA	0	NA	NA
NE6B	~	+	++/?	NA	++/?	NA	NA	NA	+	0/?	NA	0/?	NA	NA

Commentary:

Likely significant effects

Option NE6A would retain the current Local Plan’s approach to light pollution from outdoor lighting through its current criteria for outdoor lighting. Option NE6B (Preferred Option) would see the inclusion of a clear requirement within the Local Plan’s policy for development proposals to conserve or enhance the tranquillity provided by dark skies, attempting to curtail the effects of light pollution.

Light pollution can have considerable negative effects on local landscapes and species. Humans and animals have relied upon natural clocks (the rising and setting of the sun) for millennia, which light pollution can compromise. As an example, it has been identified that birds prefer to nest away from artificial light and artificial light has confused migratory birds, which is affecting their

sleeping habits⁴². Light pollution can drastically reduce the calm and tranquillity of their surroundings, negatively effecting local landscapes, historical assets and biodiversity⁴³. National Geographic reported in 2019 that 83% of the world’s population is living in light-polluted skies, demonstrating how widespread light pollution is and how rare true dark skies are⁴⁴. Outdoor lighting can also be considerably energy inefficient, as it drains energy resources produced by greenhouse gas generating energy producers for little benefit and the light often goes to waste.

The Options are therefore both important given how problematic light pollution is and the Canterbury District benefits from areas of true dark skies, with high tranquillity that must be protected⁴⁵. The Options would have a positive effect on biodiversity, landscape and the historic environment (SA Objective 3, 5 and 9) by reducing the negative effects of outdoor lighting on the District with effects on SA Objective 5 considered significant for both options. Option NE6B could lead to significant positive effects on biodiversity although there is some uncertainty related to the effects of the Preferred Option dependent on the exact requirements. There is also some uncertainty over the effects on housing and employment development for NE6B (Preferred Option) due to the potential for additional requirements which may affect viability but, overall, these effects are likely to be neutral.

The Options would have a minor positive effect on SAO2 through seeking to reduce new energy uses within the district that would require to be powered, likely by greenhouse gas generating energy generators.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The exact requirements that would be included in new policy wording.
- The potential effects on viability from new design requirements.

Provision of open space, recreation and leisure facilities

Issue NE7 - How should we protect existing Open Space within the Local Plan?

Issue NE7 - How should we protect existing Open Space within the Local Plan?														
SA Objective	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13	SAO 14

⁴² M Eens, R Pinxten, T Raap (2015), Light pollution disrupts sleep in free-living animals. Scientific Reports, Available at: <https://www.nature.com/articles/srep13557>

⁴³ Internationa Dark-Sky Association (2020), IDA General Brochure 2020. Available at: <https://www.darksky.org/our-work/grassroots-advocacy/resources/public-outreach-materials/>

⁴⁴ National Geographic (2019), Our nights are getting brighter, and Earth is paying the price. Available at: <https://www.nationalgeographic.com/science/article/nights-are-getting-brighter-earth-paying-the-price-light-pollution-dark-skies>

⁴⁵ LUC (2020), Canterbury Landscape Character Assessment and Biodiversity Appraisal, page various.

Option														
NE7A	+	+	+	NA	+	NA	NA	NA	+	NA	NA	NA	+	++
NE7B	+	+	+	NA	+	NA	NA	NA	+	NA	NA	NA	+	++

Commentary:

Likely significant effects

Option NE7A would continue with the existing approach contained within the Local Plan for the management of open spaces, which does not cover play areas and semi-natural spaces for example. Option NE7B would go further through continuing to assess the Canterbury District for open spaces and then protecting them and requiring new developments that would result in the loss of open space to prove that the open space was not needed and to compensate for its loss through the provision of new open space.

Both Options would see the protection of open spaces which would likely see biodiversity assets within the Canterbury District preserved as a result. Option NE7B would protect more open spaces and would see the loss of any open spaces replaced, creating new areas for biodiversity to take root. Both Options are considered to have a minor positive effect on biodiversity (SA Objective 3), though Option NE7B would have greater positive effects.

Open spaces are important to local landscapes and their setting. Both Options would therefore protect important landscape elements, though NE7B (Preferred Option) would be considerably more proactive in looking for important open spaces within landscapes and protecting them. Similarly, historical assets (both natural and built) can have their character and setting compromised from the loss of open spaces. Therefore, these Options would also work to conserve the historic environment of the District. Both Options would have a minor positive effect on SA Objective 5 and 9 though Option NE7B would have a greater positive effect.

Open spaces are incredibly important to allow for the resident of Canterbury District to access and enjoy the natural environment. Both Options would allow for the protection of open spaces but Option NE7B would go further, seeing lost open spaces replaced and open spaces closely mapped and monitored to ensure they are not compromised. This would result in better quality open spaces for the Districts population to enjoy. The Options would also afford protection to playing fields, which are used for important physical recreational activities. Both Options would have a significant positive effect on SA Objective 14, though Option NE7B has potential for greater positive effects.

There is no relationship between these Options and SAO1, SAO2, SAO4, SAO6, SAO7, SAO8, SAO10, SAO11, SAO12 and SAO13.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The outcomes of the new Open Space Strategy.

Issue NE8 - How can we support the provision of accessible outdoor sports and recreation facilities across the district?

Issue NE8 - How can we support the provision of accessible outdoor sports and recreation facilities across the district?														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE8A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0	+	++
NE8B	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	+	+	++

Commentary:

Likely significant effects

Option NE8A would continue the current approach of the Local Plan, which is seeking a balanced contribution of open space in line with the open space standards, requiring proportionate amounts of each type of open space. Option NE8B (Preferred Option) would be similar but would, crucially, differ by looking to prioritise sporting facilities/developments where there is an identified deficiency of such facilities in an area first.

The Options are very similar. However, Option NE8B is clearly looking to address a recurring lack of sporting facilities in certain areas, rather than seeking to just provide a selection of all types of open spaces, which is what Option NE8A would provide. This targeted approach would likely address these deficiencies in sporting facilities, ensuring such facilities are more sustainable by being in a location that has demand and satisfying that demand. This ensures such facilities can provide jobs and economic growth, though any developments created by either Option would be on a small scale. The Options are considered to have a significant positive effect on health and community (SA Objective 14) as the provision of any open space would work to make recreational activities more accessible and encourage a healthier lifestyle in the District. Option NE8B could have a minor positive effect on SAO12 through encouraging recreation development (sporting facilities) that could provide some form of employment and is clearer in its direction for this over Option NE8A, which would have a neutral effect. Both options would have minor positive effects on sustainable transport (SA Objective 13).

The effect on remaining SA Objectives are considered to be negligible.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The outcomes of the new Open Space Strategy.

Issue NE9 - How should we ensure our approach to Local Green Spaces continues to remain effective?

Issue NE9 - How should we ensure our approach to Local Green Spaces continues to remain effective?														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE9A	NA	NA	-/?	NA	NA	NA	NA	NA	NA	NA	?	NA	NA	-/?
NE9B	NA	NA	+	NA	NA	NA	NA	NA	NA	NA	+	NA	NA	+

Commentary:

Likely significant effects

Option NE9A would see consideration of removing the designations at Prospect Field and Columbia Avenue, both in Whitstable, should there be any evidence to demonstrate that the sites no longer meet the strict criteria set out in national planning policies. The Prospect Field and Columbia Avenue green spaces are still considered to meet the criteria for open spaces located in paragraph 100 of the NPPF⁴⁶. Option NE9B would retain the current green spaces identified within the existing Local Plan.

Prospect Field, Whitstable is a small section (2.5ha) of green space, comprising considerable tree resources and allotments. It is noted that there is considerable community interest/investment into this green space, showcasing its importance to surrounding communities⁴⁷. Columbia Avenue Recreation Ground, Whitstable is a small section (1.6ha) of public recreational land located in the middle of a large, modern residential development. This green space is characterised by being flat and open grassed playing field with a large playground within it. This green space has its boundary marked by a fence and sparse treeline. This green space is important to the surrounding large residential development, especially to children and families who use the generously sized playground⁴⁸. Both sites will offer some reprieve to local species, especially the Proposed Fields site due to its abundance of trees.

Option NE9A is considered to potentially have a minor negative effect on SA Objective 3 and 14 as it would see the removal of some protections from two open spaces that are important to local communities and species, who use it for recreational activities/places to live. However, there is no certainty that this would be the case. Option NE9B (Preferred Option) would maintain the current protections in place for Local Green Spaces within the Canterbury District protecting the two identified Local Green Spaces and ensuring their important recreational benefits are not potentially lost. This Options negative effects could be greater if more green/open spaces are lost throughout the lifetime of the plan because of it. Option NE9B would have a positive effect on SAO14 and a minor positive effect on SAO3.

Mitigation

- Potential identification or protection of other local green/open spaces in the Whitstable area.

Assumptions

- None.

Uncertainties

⁴⁶ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 9.

⁴⁷ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 17.

⁴⁸ CCC (2021), Draft Green Gaps and Local Green Spaces Review, page 23.

- Whether, following consideration and options consultation, the designations would be removed.

The water environment, and how it connects with our communities

Issue NE10 - How do we approach development within the coastal protections of Overtopping Hazard Zone and Coastal Protection Zone?

Issue HNC10 - How should we approach providing accessible and disability-friendly homes														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE10A	NA	++	NA	NA	NA	++	++	NA	NA	NA	NA	NA	NA	NA
NE10B	NA	++	NA	NA	NA	++	++	NA	NA	+/?	NA	NA	NA	NA

Commentary:

Likely significant effects

Option NE10A would continue the current Local Plan's approach, which is to prevent all development within Overtopping Hazard Zones and Coastal Protection Zones. Option NE10B would allow for coastal defence developments for individual properties within the Overtopping Hazard Zones and Coastal Protection Zones. The erosion along the Canterbury District's cosats are managed by many different coastal protection measures, though it is noted that due to climate change, the pressure on coastal protections is increasing⁴⁹.

The Overtopping Hazard Zones and Coastal Protection Zones exist to ensure development does not compromise the flood resilience of Canterbury's coasts or their ability to resist the effects of climate change. Option NE10A's stance of no development within these Zones is therefore understandable as the effects of climate change steadily become more evident and threatening to the existing built environment. However, the developments allowed by Option NE10B (Preferred Option) are limited to only coastal defence developments for individual properties at risk. This means such developments would be small and localised and the Option is clear that such developments should not impede future, more strategic coastal protection developments.

Any flood defences brought forward under Option NE10B (Preferred Option) would be localised to the immediate area around the residence in question, only increasing flood resilience in a small area. Both Options would work to ensure that new development at risk of coastal flooding is not created. Both Options are therefore considered to have a significant positive effect on climate, water and flood risk (SA Objective 2, 6 and 7) through protecting coastal waters from development, ensuring new development does not take place within areas at high risk of coastal

⁴⁹ LUC (2020), Canterbury Landscape Character Assessment and Biodiversity Appraisal, page 18.

flooding and/or also allowing for the creation of coastal flood prevention developments. NE10B would also have a minor positive effect on housing by ensuring properties are at a lower risk of flooding but this is likely to be very minor and uncertain.

The rest of the SAO are considered to bare no relation to these Options.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The extent to which housing would be supported by the Preferred Option.

Issue NE11 - How can we maximise the benefits of Sustainable Drainage Systems (SuDS)?

Issue NE11 - How can we maximise the benefits of Sustainable Drainage Systems (SuDS)?														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE 11A	NA	+	+	NA	NA	++	++	NA	NA	0/?	NA	-/?	NA	NA
NE 11B	NA	+	+	NA	NA	++	++	NA	NA	-/?	NA	-/?	NA	NA

Commentary:
Likely significant effects
 Option NE11A would continue the current Local Plans approach to SuDS, which is to require them within major developments and for such SuDS to provide additional benefits. Option NE11B (Preferred Option) expands the requirement for SuDS to all types of development where SuDS might be required (not restricting them to just major developments) and that SuDS must provide additional benefits. Both Options require development proposals to consider their drainage requirements.

Both Options would provide significant benefits in terms of SA Objective 7 through ensuring developments within Canterbury consider their drainage requirements and implement SuDS where necessary for major developments (both Options). Option NE11B (Preferred Option) would go further by ensuring all developments within the District consider if SuDS should be utilised to further reduce its risk from flooding and increase the resilience of an area. Both Options require SuDS to provide additional benefits to an area, maximising the benefits of these types of developments. The efficient and sustainable management of water can aid in managing and protecting local water assets and resources, ensuring both Options would have a significant positive effect regarding SA Objective 6. The Options would also have a positive effect regarding climate change (SA Objective 2), due to both Options increasing the flood resilience of the District, and biodiversity (SA Objective).

The requirements of both Options could act as a barrier to development through increasing development cost. This is especially true of Option NE11B with all development proposals potentially having to consider if they require or should implement SuDS or not and the increased cost of implementing SuDS in non-major developments. Both Options are therefore considered to have a minor negative effect in terms of the economy (SA Objective 12). With regards to housing the existing requirements (NE 11A) are considered to have a neutral effect whereas NE 11B has potential for minor negative effects.

Mitigation

- None.

Assumptions

- None.

Uncertainties

- The potential to affect viability of development (particularly employment development).

Issue NE12 - How should we consider groundwater protections?

Issue NE12 - How should we consider groundwater protections?														
SA Objective	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
Option	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14
NE12A	NA	NA	+	NA	NA	++	NA	NA	NA	NA	+	NA	NA	NA
NE12B	NA	NA	+	NA	NA	++	NA	NA	NA	?	+	?	NA	NA

Commentary:

Likely significant effects
 Option NE12A would continue the current Local Plan approach to Groundwater Protection Zones, which relies upon existing legislation. Option NE12B would establish clear requirements for development proposals within Groundwater Protection Zones, Nitrate Vulnerable Zones (NVZ) and Drinking Water Safeguard Zones.

Both Options would protect areas within Groundwater Protection Zones, with Option NE12B (Preferred Option) going further to protect NVZ and Drinking Water Safeguard Zones and therefore has a clear relationship with SA Objective 6. It is critical to ensure important sources of water do not become compromised, which can have considerable negative effects on surrounding biodiversity and compromise drinking water sources. Canterbury District is an area of the UK that does suffer from high water stress, meaning the compromising of any potential drinking water source would be particularly damaging to the District. Option NE12B is a more complete Option than Option NE12A, not just covering Groundwater Protection Zones. Whilst legislation does currently afford considerable protection to these important areas, a clear policy in the Local Plan (Option NE12B) would ensure proper water management is contained within Canterbury Council's planning policy going forward. Both Options, especially NE12B, would result in the better protection of soil resources within the District.

The requirements of these Options could create barriers to development. Both Options are reflecting mandatory statutory requirements for the management of ground water, meaning said requirements should be considered part of good practice when designing and creating new developments. However, Option NE12B would potentially require more evidence. Uncertain effects are therefore identified for housing and economy (SA Objective 10 and 12).

A minor positive effect would occur in terms of SAO3 and SAO11 through protecting ground water sources and important soil resources for both Options, though Option NE12B would provide better protection and therefore greater positive effects. Both Options would have a significant positive effect in terms of SAO6 through ensuring the better management of water resources, with Option NE12B likely providing greater benefits.

Mitigation

- None identified.

Assumptions

- None.

Uncertainties

- The extent of any additional requirements and the potential for impact on viability of development.