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**BY EMAIL ONLY**

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Dear Planning Policy Team

### **Canterbury City Council Local Plan Draft District Vision and Options Public Consultation**

Thank you for your consultation on the above dated 21<sup>st</sup> of July 2021 which was received by Natural England on the same date.

We acknowledge that this is a consultation on the early stages of the local plan, and we welcome the opportunity to provide comments at this stage before further work is carried out. Our consultation response provides advice that we think needs to be considered as part of this further work in order to deliver a sound local plan that complies with national planning policy, good practice and maximises the opportunities for environmental gains and nature recovery for Canterbury's nationally and internationally valuable natural environment and landscapes.

The most important parts of our advice can be summarised as follows:

#### **1) Ensure the chosen growth option takes a sensitive approach to the natural environment**

At this stage, we advise that further measures are required before we can support the different growth options, including the preferred option (Canterbury Focus C), to ensure the natural environment can sustain the proposed level of development. We offer advice in this letter to help Canterbury City Council (the Council) explore and refine the options so that they can achieve the most sustainable option with the greatest overall and balanced benefit for people and the environment.

To comply with national planning policy and to deliver optimal sustainable outcome, we advise that the Council need to ensure the local plan's chosen growth option will reduce its impacts on the natural environment towards neutral levels, as far as possible, by minimising the scale of impacts, mitigating and compensating beyond what has already been suggested and by delivering significant and strategic environmental gains. Please see Appendix 2 for our more detailed advice regarding each growth option.

## **2) Deliver environmental gains as an integral part of the plan**

We welcome the local plan's references to enhancing the natural environment, supporting green infrastructure, and delivering measurable biodiversity net gain. However, we advise that the plan should go further to make environmental gains a more integral part of its approach. This is essential for responding to the urgent need for action to address the climate and ecological emergency within the Local Plan's scale and timescales and it should help to overcome the expected negative impacts for multiple sustainability issues outlined in the Sustainability Appraisal (SA).

The Council should strengthen the vision, growth options and policies throughout the local plan so that they maximise the benefits of measurable biodiversity net gains through connected ecological networks that support local priorities, nature recovery and green infrastructure that simultaneously provide multiple environmental, social and economic benefits.

## **3) Adopt a Nutrient Neutral district-level approach**

As outlined in previous correspondence with the Council, it is Natural England's view that a likely significant effect on the internationally designated Stodmarsh sites (Special Areas of Conservation (SAC), Special Protected Area (SPA) and Ramsar site) cannot be ruled out due to the increases in wastewater from new developments coming forward in the River Stour catchment. Please refer to Natural England's advice sent to head and senior planners of effected Districts, dated 28<sup>th</sup> of June 2021, which has not been repeated here.

We strongly advise that the Council uses this opportunity, as they develop the local plan, to take the district-wide approach to nutrient neutrality that is required to avoid adverse impacts to the Stodmarsh designated sites. This should minimise duplication of effort at the planning application level and coordinate efforts that could achieve significant environmental gains. This may also be an influential factor for the chosen growth option. Please see Appendix 3 for more detailed guidance on this.

In addition to these key points, appendices 1 to 4 provide further advice that we think needs to be considered as part of future iterations of the local plan. Please note that we have only provided comments on areas that fall within Natural England's remit and we do not offer advice regarding all elements of the consultation that are best considered by the Council with input from other appropriate consultees.

We are committed to working with the Council to help ensure the best possible outcomes for people and the environment. For any queries relating to the specific advice in this letter only please contact Richard Cobb at [Richard.cobb@naturalengland.org.uk](mailto:Richard.cobb@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Richard Cobb  
Senior Adviser  
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Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

## **Appendix 1 – Vision and Objectives**

### **Vision**

As outlined in our overarching comments, environmental gains should be a more integral part of the local plan to manage negative impacts on key sustainability issues and to maximise the opportunities that come with strategic development at this scale.

The four topics within the local plan's Vision should have more direct emphasis on the protection and enhancement of the natural environment, green infrastructure, nature recovery and opportunities for people to engage with the natural environment. This could be achieved by including an additional topic focussed on these aspects or by integrating them within the existing topics. For example, the 'Healthy Communities' topic should mention green infrastructure as an essential part of supporting community health and wellbeing and tackling challenges of air quality and climate change.

The Vision Objectives should also be strengthened to put the emphasis on 'delivering measurable biodiversity gains and expanding and enhancing ecological networks and green/blue infrastructure to support local priorities and drive nature recovery' instead of 'supporting wildlife and biodiversity' (objective 11).

This is supported by NPPF Paragraph 174d which states that:

'174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

...

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;'

We welcome the 12<sup>th</sup> objective's focus on adapting and reducing the impacts of climate change and the reference to making sure new development is highly efficient and encourages low carbon lifestyles. To reduce the impacts of climate change, this objective should also ensure that development (existing and new) is resilient to climate change impacts such as increased risks of flooding and overheating. In addition, the Vision Objectives should explicitly seek to conserve and enhance the landscape as significant parts of the Local Plan area fall within the Kent Downs AONB and contain several local landscape designations.

Our feedback regarding the Vision Objectives should also be considered as part of refining the more specific Town Centre Strategies by incorporating opportunities to retrofit green infrastructure and climate change adaptation measures (e.g. rainwater gardens, urban cooling, natural flood management etc) that deliver resilient and sustainable growth as well as multiple benefits to local health, wellbeing and economies.

## **Appendix 2 – Growth Options**

We recognise the efforts the Council have made to balance sustainability objectives to reach a preferred option but advise that changes are needed to minimise negative impacts relating to multiple sustainability objectives for whichever approach is taken.

The level of mitigation should be commensurate to the level of impact. For example, Canterbury Focus B and Canterbury Focus C (the Council's preferred option) contain substantially higher housing targets which would 'far exceed the Standard Method derived Local Housing Need figure identified in the Housing Needs Assessment (2021)' (SA Appendix E, Preferred Option, Objective 10). This means that they would be expected to have more significant negative impacts that require more stringent mitigation compared to other growth options that have lower development pressure.

Please also see our comments in Appendix 3 regarding policies relating to various sustainability issues that are applicable for all growth scenarios to avoid and mitigate negative impacts and maximise opportunities.

### **Canterbury Focus B and Canterbury Focus C (the Council's preferred option)**

In our view, the Council's preferred option and Canterbury Focus B have not been fully balanced against all sustainability objectives and further consideration is required to exhaust alternative options. This is because these options contain much higher development pressure (14000 to 17000 homes by 2040) compared to alternative options considered (minimum development of 9000 homes to meet Government targets) and is expected to lead to negative impacts across multiple sustainability objectives according to the Sustainability Appraisal including for landscape, biodiversity, land use and water.

These impacts are associated with issues including development that alters local character and the setting of designated landscapes, loss and fragmentation of habitats, increased water consumption in an area of water stress and indirect air and water quality impacts on nationally and internationally designated sites. We do not support these growth options as they currently stand without further significant effort to avoid and mitigate these negative environmental impacts and we provide advice to help the Council overcome these issues.

We note that the investment offered by increased housing numbers in these scenarios is expected to lead to significant and welcome economic and transport infrastructure benefits. We advise that the council should consider ways that this investment could be used to secure significant environmental benefits as well. Some ways that could be further explored are:

- Focus the planned investment for economic and transport infrastructure in a way that simultaneously secures positive environmental benefits. For example, by incorporating the creation and enhancement of habitats and connectivity between ecological networks as part of transport networks. Using nature-based solutions to create wildlife corridors alongside active travel routes could contribute to this.
- We welcome the mitigation suggested for this option in the SA which suggests that green infrastructure could reduce impacts on biodiversity and landscape and provide opportunities for flood storage (Objectives 3 and 5 and 7). The efforts described here should be strengthened to further mitigate and compensate negative impacts.
- The mitigation proposed in the SA could go further by considering habitat creation and enhancement with careful consideration regarding priority habitats/species as well as designated sites.

These types of approaches can be combined with other efforts suggested throughout our consultation response as part of delivering wider environmental gains and a district-level nutrient neutrality approach by using nature-based solutions.

Our comments in Appendix 3 regarding landscape and water policies are particularly important for reducing the negative impacts of these growth options due to the negative impacts for these topics identified by the SA.

### **Canterbury Focus A**

Although we have less concern regarding this growth scenario compared with the preferred option, we advise that further effort is still needed to reduce the negative impacts on sustainability objectives and to maximise opportunities by following our advice regarding policy changes outlined in appendix 3.

Our comments in Appendix 3 regarding landscape and water policies are particularly important for reducing the negative impacts of this growth option due to the negative impacts for these topics identified by the SA.

### **Coastal focus**

Overall, we do not support this growth option in its current form due to the SA's appraisal that it is expected to result in significant negative impacts for biodiversity. However, we have questions regarding the SA's appraisal of this growth option that need to be addressed in our view. For instance, it is not clear why the coastal focus option is considered to have an equally negative score as the preferred option considering that the coastal focus contains substantially less development pressure on biodiversity. In addition, the SA suggests that there are potential risks of impacts on water quality and coastal waters associated with this option but specific mitigation measures have not been proposed regarding this and it is unclear if this has influenced the overall score for water.

We advise that these factors should be further explored and clarified as part of future iterations of the SA and local plan options to ensure a coastal focus option is being appraised in a balanced way, especially given its potential landscape benefits of focussing development away from the Kent Downs AONB compared with other growth options.

We welcome the reduced impacts expected for biodiversity (SA Objective 3 – Appendix E) from reduced greenfield land usage compared to the preferred option and reduced indirect impacts from water and air quality on designated sites compared to the Canterbury options. However, the increased recreational pressure on coastal designated sites (Thanet Coast and Sandwich SPA/Ramsar and Thames, Medway & Swale SPA/Ramsar) and the Strategic Access Management and Monitoring Strategies (SAMMs) should be reviewed and, where necessary, updated to ensure that it is sufficient for managing this increase in pressure.

### **Rural Focus**

Overall, we do not currently have a conclusive view on whether we support this approach due to the level of uncertainty regarding development location but have concerns regarding the potential for negative landscape impacts and mixed impacts regarding biodiversity.

There is concern that while there may be less large-scale development that would have significant landscape impacts, the SA suggests that there is expected to be additional growth within the Kent AONB and its setting which could cause significant negative impacts. Stringent criteria relating to any development within the AONB and its setting will be particularly important for this scenario, in line with the great weight that should be given to conserving and enhancing the AONB which has the highest status of protection (NPPF paragraph 176).

Despite these issues, this scenario is expected to lead to less negative impacts than other scenarios in terms of biodiversity which we support. While there may be less strategic opportunities to connect, extend and enhance ecological networks, this option could be more beneficial if several clusters of ecological networks are considered at strategic points throughout the District, with net-gain contributions feeding into this as part of off-site solutions.

### **New Freestanding Settlement**

Overall, we do not currently support this option due to the scale of concentrated development which is expected to have significant negative impacts for multiple sustainability objectives that would be difficult to mitigate and compensate for to an acceptable level. In particular, we strongly advise that a new freestanding settlement must not be located within the Kent Downs AONB or its setting.

The uncertainty regarding the scale and location of a freestanding development makes it difficult to have a conclusive view. However, in principle, it is normally favourable to sensitively integrate development using existing infrastructure and developed land as far as possible. This is unlikely to be feasible for this option and we advise that alternative options would need to be exhausted before a freestanding settlement of this scale could be justified, especially as the SA suggests that this option would be expected to rely on a higher proportion of development on greenfield land than other options.

If large-scale development associated with this type of growth scenario were to be considered further, very high standards of environmental gains would be required across multiple topics to provide high levels of mitigation and compensation, and to maximise opportunities to design coordinated environmental benefits such as green infrastructure and enhanced ecological networks.

## **Appendix 3 – Development Management policies**

### **Housing**

Given the negative impacts in a water-stressed area (as highlighted in table 5.2 of the Sustainability Appraisal for all growth options), high standards of water efficiency and water quality should be required in the policy for new housing and should be further explored as part of future iterations of the local plan and SA. Please see the 'Water Efficiency' section for more detailed guidance on this.

### **Movement and Transport**

We support the ambition to maximise active travel in the district. This could be strengthened by ensuring that sustainable transport options are multifunctional and deliver wider ecosystem services such as green infrastructure and wildlife corridors as part of nature recovery strategies. This is a good opportunity to strengthen this policy and to help deliver wider environmental gains as part of the local plan.

### **Historic and Natural Environment**

The overarching text for the natural environment that refers to SPAs, Ramsar sites and Sites of Special Scientific Interest (SSSI) should also refer to the SAC designations that are within the local plan area (Stodmarsh, the Blean Complex and Tankerton Slopes and Swalecliffe).

We support the commitment to Biodiversity Net Gain (BNG) in Issue NE3. We advise that BNG should be considered as part of delivering wider environmental net gains through the delivery of green infrastructure that is multi-functional to maximise the wider environmental functions and benefits for people, nature and places. Policies should look to increase transparency in decision-making on biodiversity net gain by allowing evaluation of losses and gains of different ecosystem services. Natural England's voluntary Environmental Benefits from Nature Tool may help with this once it is finalised (see the beta version here: [The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](https://naturalengland.org.uk)).

We support the commitment for a 'district tree strategy and a pollinator plan, as well as biodiversity net gain and local recovery strategies'. These plans and policies should complement one another and should be a recurring consideration throughout relevant local plan policies, site allocations, design and layout. Policies should also provide clear and robust links to relevant supplementary planning documents to give them an appropriate level of influence on planning decisions.

The Council will be aware of the need to comply with the updated version of the NPPF. As part of this, the Council's strategies and local plan should consider the latest guidance regarding design guides or codes in line with the principles set out in the National Design Guide and National Model Design Code and new requirements regarding trees (including that new streets should be tree-lined).

The Council will also be aware of the upcoming need for local nature recovery strategies as part of the national Nature Recovery Network (NRN) and the Environment Bill. While the detail for these strategies is still being developed, the local plan is at a stage where local nature recovery principles should be a key consideration going forward to maximise ecological benefits of local plan policies and strategies that create and enhance coherent ecological networks. For more guidance on this, please see here <https://consult.defra.gov.uk/land-use/local-nature-recovery-strategies/> and here: <https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network>

## **Biodiversity Net Gain**

Overall, we support the preferred option (NE3C) compared to other options and advise that it should be strengthened in the ways outlined below. We strongly support the preferred option's (NE3C) aspiration to deliver 20% biodiversity net gain (BNG) and praise the council's leadership in pushing beyond the minimum 10% expected to be required by the Environment Bill.

In addition to the 20% requirement, it is essential that the local plan makes it clear that BNG is required over and above meeting wider biodiversity good practice for planning and development including the following:

- Follow the mitigation hierarchy and achieve net gain in addition to this
- Ensure plans and developments are designed and delivered in line with local ecological priorities and strategies (e.g. local biodiversity action plans, priority species/habitats and nature recovery strategies)
- Exhaust all reasonable opportunities to achieve measurable and meaningful biodiversity net-gain on-site before considering off-site measures
- Ensure off-site measures are delivered in line with local priorities and strategies for green infrastructure and biodiversity that contribute towards strategic networks and nature recovery
- Ensure appropriate management and maintenance measures are in place throughout and after development
- Follow industry-good practice including the Good Practice Guide jointly produced by CIEEM CIRIA and IEMA (<https://cieem.net/i-am/current-projects/biodiversity-net-gain/>)
- Reference and comply with the latest Natural England and Defra guidance for the [Biodiversity Metric 3](#) and BNG approach, and other relevant tools that emerge including the [Environmental Benefits for Nature Tool](#) and the [Small Sites Metric](#) which is currently out for consultation. We urge the Council to give their consultation feedback on this and the upcoming BNG Government consultation expected for release this Autumn

Other requirements from the Environment Bill should also be incorporated in the policy including the need for developers to submit a BNG Plan for Council approval, and habitat sites considered as part of BNG calculations will need to be secured for at least 30 years and uploaded onto the national register once this is available.

The above additions should be clear in the policies with clear links to relevant guidelines to the upcoming relevant Supplementary Planning Documents (SPDs) for biodiversity to ensure that it will have an appropriate level of influence on planning decisions.

We encourage and welcome Canterbury's efforts to work in partnership with other local authorities and partners, via the Kent Nature Partnership, to work on a joint approach to net gain especially for strategic offsite net gain opportunities.

We appreciate that more specific policies and guidance will be developed as part of future local plan/SPD development and have offered this advice to help the Council incorporate our latest guidance as part of this work.

## **Green and Blue Infrastructure**

We support the preferred option's (NE3C) reference to enhancing and creating green and blue infrastructure as part of development. In addition, we think this should be strengthened to incorporate more specific policies regarding green and blue infrastructure including a requirement that all developments create green spaces as part of green space networks.

Where this is not possible, developments should at least contribute to these networks in some way. For example, through linear habitat creation that can promote connectivity between green space networks where it is not possible to create significant amounts of new green spaces on site.

The preferred option wording is slightly unclear and should be changed to make the expectations clearer. It is our interpretation of the wording that it should say that new developments need to conserve and enhance or create blue and green infrastructure in addition to a 20% BNG.

### **Protecting and enhancing landscapes**

We welcome the recognition of the Kent Downs Area of Outstanding Natural Beauty (AONB) national importance and the protection given to this exceptional landscape, especially given the significant extent of the local plan area that is within the AONB. We support the principle of the preferred option's (NE6B) proactive approach to ensure that dark skies are conserved, enhanced and extended where possible, and advise that robust and clear criteria should be explored as part of defining this policy in more detail during the next stages of the local plan process. The chosen growth option will also need to consider this policy in detail to ensure that site allocations will be in keeping with this policy.

While we support this option in principle, this is only one component that needs to be considered as part of protecting this nationally important landscape. We advise that clear and robust policies must also be provided that ensure the AONB is conserved and enhanced, as a whole, through the local plan process with due regard to the AONB Management Plan. This view is supported by the Sustainability Appraisal's suggested mitigation measures (e.g. Appendix E, SA Objective 5 for the preferred option). This overarching protection should be given prominent emphasis as part of the policies within this section.

### **Green gaps**

We support the principle of green gaps as they can help to preserve areas of green infrastructure and prevent fragmentation of wider ecological networks. We therefore think further careful consideration needs to be made regarding the changes proposed in policy NE5B which suggests that some development will be permitted in these spaces. If this policy change is adopted, it is our view that the strict criteria regarding aspects like design and layout should not only manage negative environmental impacts but look to enhance green gaps and deliver overall environmental net gains as they may provide valuable strategic opportunities. Likewise, we support option NE7B over NE7A but advise that the strict criteria regarding loss of space is carefully considered to ensure that overall loss of green space is avoided and that where possible, the quality and quantity are increased to ensure that communities retain the same or greater level of access and enjoyment of local green spaces. The green infrastructure and biodiversity value should also be an influential consideration for changes to open spaces.

Given the uncertainty of site allocations, we advise that option NE5S's regard for identifying new green gaps should be taken to consider this as more detailed development locations become available.

### **Water environment**

We support option NE10B's suggestion that further investigation and discussion is needed to make sure the safety and sustainability for any option is secured. This is an important consideration for the long-term and we support the view that other plans such as the Shoreline Management Plan need to be considered as part of this.

### **Nutrient Neutrality**

As we have detailed in previous correspondence, our general advice regarding new development within the Stour Catchment is that it needs to be ensured that impacts to the Stodmarsh sites can be ruled out, such as through nutrient neutrality or demonstrating that effluent is discharged outside of the established Stodmarsh catchment presented in Natural England's nutrient neutral methodology<sup>1</sup> (NNM). While there are some references to managing impacts on water quality at this point in the local plan, we expect that policies will be adopted that take account of this and the findings from the upcoming Local Plan HRA.

We strongly advise that calculation of a district-wide nutrient budget factoring in allocations, a suitably precautionary windfall value as well as any mitigation or inherent land use change which could facilitate delivery of development. With respect to mitigation, we also strongly advise working closely with other affected local planning authorities, the Environment Agency and Southern Water. Finally we advise that capturing the specific catchment of, or at least all relevant plan allocations connecting to, the May Street (Herne Bay) Wastewater Treatment Works in such a way that the proportion of sewage they create will be discharged via the Hogwell Sewer outfall thereby avoiding nutrient impacts on the Stodmarsh designated sites.

Using nature-based solutions such as interceptor wetlands that are being adopted by other local authorities (e.g. Ashford), also provide opportunities to deliver multiple benefits at the same time as nutrient neutrality, such as green infrastructure, biodiversity, carbon sequestration and flood resilience. We encourage the exploration of these types of approaches to maximise the benefits of people and the natural environment and as part of achieving the local plan's vision and objectives.

### **Water efficiency**

Given the water pressure throughout the district, as identified by the SA (point 3.16.10), we advise that higher standards of water conservation policies should also be adopted. We welcome Option HNC81's reference to higher standards than 110 litres per person per day for large and/or strategic sites but advise that the Council should further consider more stringent policies that apply to all new dwellings with a specific target of 100 litres per person per day. Policies should also be considered that promote greywater recycling or rainwater where this is not possible on greenfield sites to further reduce the negative water impacts from the growth forecasted by the local plan and to consider retrofitting SuDS in redevelopment areas to further mitigate for negative water impacts and to reduce the impacts of climate change on water quality and flooding. These measures should also help with securing a nutrient neutral approach.

### **Sustainable Drainage Systems (SuDS)**

We support the preferred option's (NE11B) encouragement for all development to use SuDS and to explore benefits and advise that this should be strengthened to make this a firmer requirement. Any SuDS solutions should also be in line with industry good practice (e.g. CIRIA The SuDS Manual - C753F)

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<sup>1</sup> Natural England (November 2020). Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites. Available at:

<https://www.ashford.gov.uk/media/l3dgnfyu/stodmarsh-nutrient-neutral-methodology-november-2020.pdf>

## Appendix 4 - Sustainability appraisal

### Overarching comments

We recognise that the Sustainability Appraisal (SA) is an iterative process and will be refined as the local plan detail is developed. As the SA currently stands, it is our view that further effort needs to be made to ensure that negative impacts from the growth options are avoided as far as possible, either by further exhausting reasonable alternatives and/or by adopting more robust mitigation measures, and by securing overall environmental net gains (see Appendix 1 and comments throughout our response for suggestions on this).

NPPF Paragraph 8 states (*italics added for clarity*) that ‘Achieving sustainable development means that the planning system has three overarching objectives [*economic, social and environmental*], which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).’

Paragraph 32 also states that (*emphasis added*):

‘Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements<sup>19</sup>. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). **Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.** Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)

<sup>19</sup> The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects.’

The Council appears to be prioritising social and economic considerations over environmental ones as the preferred option has higher negative impacts for environmental factors compared to some alternative growth options despite alternatives having some positive scores for economic and social objectives. For example, Canterbury Focus A has more positive/less negative impacts on biodiversity and landscape while retaining some positive scores for housing, economy and transport. In comparison, the preferred option’s higher housing targets mean that there will be greater investment in local transport and economic opportunities (section 5.4.4 and 5.4.5) but it is expected to have negative impacts (with some mixed positive impacts) on multiple sustainability issues including biodiversity, landscape, land use and water (table 5.2). Furthermore, it would not be unreasonable to assume that these impacts would be higher than alternative scenarios with less development pressure given the greater loss of greenfield sites required (SA section 5.4.10) and the greater environmental impacts associated with an increased population such as from increased road traffic and water consumption.

We also question the equal overall score given to lower and higher housing scenarios for Water (negative impacts), given the increased pressures on water quantity and quality that is associated with significantly higher volume of housing.

We question the SA’s assumption that new development will achieve greenfield runoff rates for all growth scenarios (Appendix E). Although we would welcome this high standard of runoff rates and local plan policies that support this, it is our view that this is unrealistic as the current policy proposals do not require this and the mitigation suggested in the SA

(Appendix E) suggests that local plan policies should seek greenfield rates 'as far as possible'. The SA methodology should therefore be updated to ensure a realistic appraisal of runoff rates are being considered.

We support mitigation measures identified for different growth options including for green infrastructure networks as part of mitigating biodiversity and landscape impacts, and the priority for using previously developed land where possible. However, given the above concerns, it is our view that further consideration needs to be given regarding alternative options, increased levels of mitigation and the potential for environmental net gains to ensure a well-balanced option is taken in line with national planning policy.

## **Objectives**

We broadly support the key sustainability objectives used to underpin the SA (Table NTS 1). We advise that the following amendments would help strengthen these further to ensure a well-balanced approach to appraising different growth options:

- Objective 2 should be framed around the aim for achieving a zero carbon future, especially given the timeframe of the local plan within the broader context of Government's net-zero carbon targets and the Council's own net-zero pledges. Currently, the sub-objectives refer to high levels of energy efficiency and supporting renewables which are welcome but efforts regarding this need to be more ambitious given the Council's wider aspirations and the urgency of the climate emergency.
- Sub-objective 3.1 – the support for achieving biodiversity net gain is welcome. As advised elsewhere in our response, BNG should be in addition to following the mitigation hierarchy and good practice (see Appendix 2) and this should be reflected in this sub-objective.
- Sub-objective 3.6 - consider moving 'Carbon Sequestration' to objective 2 which is concerned with climate change, whereas objective 3 is focused on biodiversity
- Objective 7 should reference managing surface water flooding impacts

## **Monitoring (Appendix K)**

We recognise that the monitoring metrics will be refined as the local plan develops. We offer the following advice to help shape these metrics so that they can monitor the effects of the local plan options with an appropriate level of detail:

- Point 3.1 should specifically consider the BNG percentage changes (including for area and linear habitat) that developments commit to and what they achieve in practice
- Sub-objective 3 could be more specific regarding 'changes to green infrastructure' by considering changes in extent and quality of green infrastructure. Please refer to the upcoming updated version of ANGSt (Accessible Natural Green Space Standards) and Natural England's Green Infrastructure Standards for guidance on this.
- Sub-objective 3's reference to 'Number of planning applications which incorporate habitat creation/restoration' could be expanded to consider enhancement and connectivity (e.g. linear habitats and wildlife corridors as part of wider ecological networks)
- The metric suggested for sub-objective 5.1 should be more specific by considering the extent and impact of development within designated landscapes and their settings (e.g. quantity of housing, features at risk of impact), achievement of specific landscape targets (e.g. AONB management plan objectives)
- Sub objective 6.1 should reference specific pollutant metrics in line with HRA and Stodmarsh nutrient neutrality methodology
- Sub objective 6.3 could consider the volume and peak run-off rates targeted and achieved on sites (in line with the CIRIA SUDs manual) in addition to the number of

applications with SUDs. Metrics in relation to water efficiency standards in relation to policies relating to this may also be appropriate (Litres per person per day)

- Objective 7 – consult with the Environment Agency and Lead Flood Authority to ensure appropriate metrics are being used.