

**From:** [REDACTED]  
**Sent:** 29 February 2016 10:33  
**To:** policy, planning  
**Cc:** [REDACTED]  
**Subject:** 175388 - Medway Local Plan Issues and Options – Jan 2016  
**Attachments:** NE Feedback Form 2015.pdf; ATT00001.txt

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Planning Team

Thank you for consulting Natural England on your Issues and Options document. My comments are as follows:

- We note (in para 1.2) that "*The document does not set out detailed policies or identify specific sites for development. Rather, it presents key contextual matters that will be the drivers for the new Local Plan*". We look forward to early informal dialogue about policies and allocations that are likely to have a significant effect on designated habitats and landscapes.
- Question 1 - The vision should pick up on the commitment to "protecting the natural environment" (Para 5.3, Bullet 3), informed by the government's ambition for sustainable development which includes (inter alia):
  - *To address the connections between people and places and the integration of new development into the natural, built and historic environment - Para 61*
  - *To conserve and enhance biodiversity - protecting irreplaceable habitats – Para 118*
  - *To plan for biodiversity at a landscape-scale in the context of local ecological networks, and across local authority boundaries and with Nature Improvement Areas – Para 117*
  - *To minimise impacts on biodiversity and provide net gains in biodiversity where possible, to halt the overall decline in biodiversity, by establishing coherent, resilient ecological networks - Para 109*
  - *To maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, ... and improve public access to and enjoyment of the coast - Para 114*
  - *To recognise the intrinsic character and beauty of the countryside - Para 17*
  - *To define Green Infrastructure, a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities – NPPF Annex*
  - *To conserve landscape and scenic beauty in Areas of Outstanding Natural Beauty and their wildlife and cultural heritage - Paras 115 & 116*
  - *To protect and enhance valued landscapes, geological conservation interests and soils - Para 109*
- We welcome your commitments in para 6.7, particularly that "*The council recognises the importance of working at a landscape scale when planning for the natural environment. It works with the Kent and Thames Gateway Nature Partnerships. This collaborative working established a Nature Improvement Area that included investments in habitats on the Hoo Peninsula, and seeks to deliver the targets of the Kent Biodiversity Strategy through cross boundary biodiversity opportunity areas in the marshes and downs. The North Kent Environmental Planning Group has developed a strategic access mitigation and management strategy to address the potential of recreational disturbance to the special features of the Thames, Medway and Swale Special Protection Areas and Ramsar sites. The Thames Estuary 2100 Plan provides a framework for tidal flood risk management in Medway, and the proposals will be built into the Local Plan to ensure safeguarding of land and policy development. The council also works for the conservation and enhancement of the Kent Downs Area of Outstanding Natural Beauty through its management plan and role in the Joint Advisory Board.*

- Question 2 & 3 (Strategic Issues). Most of the issues relating to the natural environment have been flagged in your document or will become clear through the work on the plan.
- Questions 4 to 14 are mainly around housing matters and Questions 15 to 21 relate to employment. These generally lie beyond our remit and we have no comments, except to note that, in seeking allocations, consideration should be given to:
  - potential impact (direct, indirect and cumulative) on the nationally important designated landscapes (Kent Downs AONB) and habitats (SSSIs & NNRs) and on internationally important designated habitats (SPAs, SACs and Ramsar sites)
  - our Impact Risk Zones (IRZs) which are available on [magic.gov.uk](http://magic.gov.uk) or can be downloaded
  - impact on local nature sites, BAP habitats, habitat networks (including components such as hedgerows, water courses natural ponds etc), areas known or expected to support protected species, species of principal importance and the quality of agricultural land.
- Questions 22 to 24 (Tourism) and 25 to 29 (Retail) generally lie beyond our remit so we have no comments.
- Para 11.2 mentions MCZ – further information is available in various documents available on [www.gov.uk/government/publications](http://www.gov.uk/government/publications) and searching on marine conservation zone.
- Para 11.3 – Has the value of the setting of the Kent Downs AONB been broadly defined and recognised?
- Para 11.4 & 5 – the recognition of the area’s distinct sense of place and the wide range of landscape types (beyond the AONB) is welcomed, along with the commitment to use of LCA (and presumably of LVIA) to test development proposals where appropriate.
- Para 11.7 - we welcome reference to the coastal path. Work is currently starting on the Medway section of the path and greater detail may be available for inclusion in the Plan, as it progresses. I understand that a dialogue on the project is in hand between your colleagues and mine.
- Para 11.8 - Consideration of ecosystem services will assist an understanding of the value of key habitats and features, and inform decisions about allocations, development briefs and the GI strategy.
- Para 11.9 – We are pleased to hear that *“the council has commissioned a Green Infrastructure Planning Project to analyse the principle components of Medway’s environmental networks. This will help inform the planning process in determining the most sustainable locations for future growth, and securing multi-functional and high quality green infrastructure in new development”*.
- Para 11.10 – We note that *“There are some ‘gaps’ in the public rights of way network. In particular, greater access to the river would not only take advantage of Medway’s central feature”*. Natural England’s work on the coastal path, will involve partnership with the Council and others, and will help to address some aspects of the deficit.
- Para 11.12, second sentence – indicates that *“Planning policy and legislation provide strong protection against inappropriate development of the most important designated sites”*. The words “either directly or indirectly having a significant effect on” should replace the word “of”.
- Question 30 (means to secure and strengthen Medway’s environment). This would be best achieved through development that responds positively to the natural environment, including landscape character, habitats and associated networks, and the species they support.
- Question 31 (connectivity for wildlife and people). The mapping implicit in the response to Q30 above (including the mapping required by NPPF) and the other work needed to prepare a GI Strategy should provide a sound basis for delivering “connectivity”.
- Question 32 – (the role of landscape). NPPF Para 17 indicates the need to recognise the intrinsic character and beauty of the countryside. This may be identified in existing Landscape Character Assessment and may be informed by Natural England’s NCAs (<http://publications.naturalengland.org.uk/category/587130>). This provides a basis for understanding where development may be accommodated, and what nature and scale of development is possible. These conclusions can be tested through the use of tools such as LVIA.
- Questions 33 to 37 relate to the built environment and generally lie beyond our remit. Our only comments relate to the opportunity to improve urban areas through the inclusion of accessible natural green space and GI to ensure

development is sustainable in terms of provision for health and wellbeing, and provide landscape and habitat corridors for people and wildlife.

- Questions 38 to 48 relate to the services and infrastructure, and the issues generally lie beyond our remit. The comments above on greening, have relevance to Q43 to 46
- Para 16.1 should make reference to the value of green corridors for sustainable travel, exercise and opportunities for the movement of wildlife, inter alia.
- No comments on Questions 49 to 53. The overall level of provision is a matter for the LPA, albeit that the need and opportunities for GI should inform detailed design and may present opportunities for higher levels of provision.
- Questions 54 and 55 deal with Sports facilities. No comment.
- Question 57 – this matter is beyond our remit. However, section 19 mainly deals with Air Quality (AQ) in respect of urban areas and impact on those communities. It is important to review the conclusions of previous work on the HRA (around 2011) and consider indirect impact on N2K sites that are sensitive to AQ changes, and the loads that may occur from road within 200m of them, that will carry additional traffic arising from development. See the Air Pollution Information System (APIS) website for data. Any proposals for facilities such as power stations need to be closely considered in view of their potential impacts on air quality across a wider area and associated communities and habitats.
- Questions 58 to 60 – relate to M&W. We have no comments at this stage and assume that the selection of any sites will be subject to proper consideration through the HRA and the SEA processes, will involve the consideration of alternatives and that we will be consulted.
- Para 22.8 – some of the statements in NPPF that define sustainable development in respect of the natural environment are included above. See Question 1.
- Questions 61 to 65 generally fall beyond our remit. Clearly sustainable development should be delivered through consideration of the guidance provided by NPPF. In respect of questions 63 and 64, it would be helpful to outline expectations of the nature and scale of changes associated with climate change on settlements and the natural environment
- Para 23.5 (Flood Risk). We welcome your involvement in the South East Coastal Group, and the two Shoreline Management Plans relevant to the Medway Council and the reflection of the results in the Issues and Options document.
- Questions 68 and 69 relate to sustainable energy. The designation of any sites or zones should come from an assessment of potential and opportunities. The results should be tested against a range of criteria relating to the landscape, habitats and wildlife, inter alia.
- The issues raise in Question 70 are beyond our remit.
- Questions 71 to 75 relate to transport and are beyond our remit.
- Any changes to the scale of activity at Rochester and Stoke Airports will need careful consideration in respect of a broad range of factors, including issues for the natural environment, such as the tranquillity of the Kent Downs AONB and disturbance to birds, inter alia.
- Para 26.11 – the issue of costs and viability are clearly important. However failure to fund elements of proposals may mean development is not sustainable in terms of NPPF.
- Questions 76 to 79 (deliverability) generally fall beyond our remit.
- Given the pressures on the natural environment (urbanisation and development, economic and recreational pressures, climate change etc), consideration should be given the “protect and enhance” in para 27.3 rather than just “protect”. As a result, some reference to GI would also be helpful.
- Lodge Hill (para 27.5 to 27.7). We welcome the approach outlined. It is important that the site options are evaluated objectively using consistent criteria and methods.
- Para 27.9 to 27.34 (patterns of residential development). The “alternatives” set out in this section may prove to be the complementary components, all of which may be needed to deliver sustainable development. In most cases,

successful development will need a good design framework to ensure high quality of built design and inclusion of appropriate landscape, open space and habitats.

- It would be helpful to have some clarity in the plan regarding the brief for Garden villages.
- Questions 80 to 87 (Development Strategy). These matters generally lie beyond our remit. Apart from the points raised above, we have no further comments.

There is currently significant pressure from consultations on land-use proposals and appeals, the completion of local plans, the review of existing plans, and work on neighbourhood plans (there are over 500 parishes in Kent and Sussex). This makes it difficult to devote the time that consultations deserve. Nevertheless, I hope you find these comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England, please use the appended form.

Yours sincerely

John Lister

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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.

Please send all new consultations to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) .

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