

Your ref: issues and options 160216
My ref: issuesandoptions160216

16th February 2016

For the attention of
Catherine Smith
Planning Policy Manager
Planning Policy Regeneration
by email



Kent Wildlife Trust

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Dear Catherine

**Medway Council Local Plan
Issues and Options 2012- 2035
Consultation document January/February 2016**

Thank you for inviting us to comment upon your proposed Issues and Options. Kent Wildlife Trust understands that this is early stages of consultation and welcomes the opportunity to contribute to the process. As the document does not at this stage include any detailed policy or site allocations, we would like to make some more general recommendations regarding biodiversity content. These are given below:

- Kent Wildlife Trust understands that a key driver to this plan is the projected significant increase in population of 21.8% in Medway during the timeframe for this plan, alongside economic growth. It is essential that in planning for this projected increase in population, the natural environment is not compromised, in accordance with the NPPF Core Planning Principles.¹
- The consideration of Chattenden Woods and **Lodge Hill Site of Scientific Interest as a development site** is of extreme concern to Kent Wildlife Trust. Whilst we appreciate that the Council cannot pre-judge the outcome of the Public Inquiry into the Lodge Hill application, however, we feel it is important to state that we oppose this proposed development opportunity in the context of the Local Plan, considering its impact upon a nationally important designated site (SSSI).
- Kent Wildlife Trust welcomes the reference made to the North Kent Environmental Planning Group in the Strategic Issues section, paragraph 6.7. We would recommend that this continues to be supported at the next stage of plan preparation. At preferred options stage, this policy should clearly refer to the support for **North Kent Marshes Strategic Access Management and Monitoring Strategy and its associated funding mechanism**, which aims to reduce the negative impact of development upon the areas of international importance for nature conservation.
- Kent Wildlife Trust welcomes the overview of environmental significance and value provided in paragraph 11.2. This new plan should **protect and enhance spaces of**



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international and national importance. We would recommend that Medway’s Local Plan should have a specific policy in relation to this. The NPPF does emphasise that the planning system should, “minimise impacts on biodiversity and provide *net gains* in biodiversity where possible.”ⁱⁱ

- We would also recommend that Medway should have a specific, separate policy in relation to the protection and enhancement of **sites of county importance, such as Local Wildlife Sites and Roadside Nature Reserves**. This would better support development management decision-making, where local sites in Kent are increasingly under threat, from both direct and indirect impacts of development, including increased recreational pressure. The importance of these are not emphasised in the current consultation document, although reference is made to the local importance of non-designated sites in paragraph 11.12.
- Kent Wildlife Trust commends Medway Council for the reference made in paragraph 11.8 to the importance of securing a wider green infrastructure network. National policy supports making local policy provision for wider green infrastructure and this should serve the function of maintaining connectivity and providing ecological resilience between protected spaces and the broader countryside at a landscape scaleⁱⁱⁱ. We encourage the Council to proactively plan for a Green Infrastructure network, and the next stage of preparation of the Local Plan should include a policy **clearly stating that Green Infrastructure will be provided**. It should also follow through on early work described in paragraph 11.9, by referring to a supporting Green Infrastructure Plan. Medway Council should ensure that an appropriate **financial mechanism** is provided, supported by measures such as section 106 legal agreements and Community Infrastructure Levy.
- The plan should also make policy provision for the protection and enhancement of biodiversity **within its allocated sites**. This should include clear “development principles” on sites of higher biodiversity value or adjacent to more sensitive sites for nature conservation. Reference should be made to county **Biodiversity Opportunity Areas** and Kent Wildlife Trust would recommend referring to these in the policy detail. Ashford’s Local Development Framework and its Area Action Plans are a good example of where biodiversity objectives have been included within site-specific “development principles”.

Thank you for involving us in the development of this Local Plan. We would be more than happy to contribute to any further detailed discussion or future stages that may follow as part of your Local Plan process.

Yours sincerely

Vanessa Evans
Planning and Policy Officer

ⁱ NPPF reference, paragraph 17, Core Planning Principles “*Planning should contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework*”.

ⁱⁱ NPPF, paragraph 109, page 25.

ⁱⁱⁱ The NPPF states in paragraph 117, that “*planning policies should plan for biodiversity at a landscape-scale across local authority boundaries*” and “*identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation*”.