Shepway Core Strategy
Examination in Public

Matter 2: Housing, Economy and Infrastructure [Core Strategy policies: SS2, SS5, CSD1, CSD2, CSD3, CSD5, CSD10]

Issue 2.6

Additional information by
Kent Wildlife Trust
Respondent ref: 25
Matter 2 – Housing, Economy and Infrastructure [Core Strategy policies: SS2, SS5, CSD1, CSD2, CSD3, CSD5, CSD10]

Issue 2: Are the Core Strategy’s proposals for the provision of new housing and economic development deliverable, clear, sufficiently justified and consistent with the local evidence base, the South East Plan and national policy in PPS 3? Does the Core Strategy provide satisfactorily for the delivery of development, with particular reference to transportation infrastructure, and enable adequate monitoring of its effectiveness?

2.6 Are the Core Strategy’s infrastructure requirements clearly expressed, adequately justified and consistent with national policy? Is it clear how these will be carried forward in policy terms?

1. Kent Wildlife Trust welcome the information contained within the Green Infrastructure Report and the commitment to enhance and connect the Biodiversity Opportunity Areas. We are particularly pleased to see the commitment within the report to a district wide Green Infrastructure Strategy within paragraph 6.6. We also welcome the commitments within CSD4 to the protection of SSSIs, ancient woodland, other wildlife designations and Biodiversity Action Plan habitats. The green Infrastructure report and CSD4 provide the baseline for Shepway District Council’s vision to provide a fully connected, multifunctional Green Infrastructure.

2. Within the Lawton Review, the England Biodiversity Strategy and the National Planning Policy Framework the protection of internationally, nationally and locally designated sites and creation of a landscape scale ecological network and site specific Green Infrastructure is promoted. The NPPF states that :-

113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.

114. Local planning authorities should:

• set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;

117. To minimise impacts on biodiversity and geodiversity, planning policies should:

• plan for biodiversity at a landscape-scale across local authority boundaries;
• 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;

• promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;

3. Biodiversity Opportunity Areas were formulated to identify the most ecologically rich areas within Kent and Medway and opportunities for re-creation of natural habitat that would protect and link the internationally, nationally and locally designated sites and valuable Biodiversity Action Plan habitats to form an interlinked, landscape scale network across Local Authority boundaries. The BOAs were not meant to be a bar to development or access; rather they were intended to provide a steer to Local Authorities and other agencies as to where habitat restoration, enhancement and re-creation could be focused to provide the greatest gains for biodiversity. It is hoped that delivery of the BOAs will be achieved through a number of different funding streams. From a development viewpoint contributions can be levied to protect, enhance and connect the SSSIs, LWSs and Biodiversity Action Plan habitats that are under threat due to increased visitor and other pressures as a result of development. This will increase site resilience, provide additional habitat to enable species spread and migration between sites and provide natural habitat for the local populace to enjoy.

4. We are concerned that despite increased emphasis on recreation within the Mid Kent Greensands and Gault, the Dover and Folkestone Cliffs and Downs and the Romney Marsh BOAs and, actively managing coastal environments for green infrastructure and sustainable recreational purposes there are few details as to how biodiversity enhancement and connection and delivery of the BOAs will achieved either within the CSD4, the site and area specific policies or the Green Infrastructure Report, or what contributions will be made to landscape scale delivery to alleviate the increased recreational pressure resulting from the increased population and easier access proposed. Within the Table on pp26-28 of the Green Infrastructure report, with the exception of Shorncliffe Garrison, much of the proposed Green Infrastructure work will improve the Public Right of Way network off site and/or provide an urban Green infrastructure within the development site. Although we have no objection to this in principle, and welcome creation of Urban Green Infrastructure within the development sites, enhancement of the PROW network will increase access onto the BOAs causing damage
to a number of important SSSIs such as Folkestone Warren, Lympne Escarpment and Gibbins Brook and many Local Wildlife Sites, if no mitigation and compensation is provided.

5. To ensure biodiversity protection, enhancement, extension and connection on a landscape scale, it is our view that Core Strategy Policy should commit ideally to the formulation of a Green Infrastructure Strategy DPD or, at least further work on a District wide Strategy to be included in further DPDs. The Strategy should detail the protection, enhancement, connection and management mechanisms that will be required to ensure no impact on the SSSIs, Local Wildlife Sites and important habitats and identify projects to achieve delivery. The DPD should be produced before any Strategic or large applications are agreed to ensure all development contributes to biodiversity enhancement and connectivity within the wider BOAs.

6. It is Kent Wildlife Trust’s view therefore that a further clause should be added to CSD4 stating that Development design must incorporate an on-site multifunctional Green Infrastructure and provide contributions to the district wide Green Infrastructure to mitigate and compensate recreational and other impacts on nationally and locally designated sites and the wider BOA network.

7. Within our representations to the proposed submission document we have recommended changes to site or area specific policies that would provide further clarity in regards to specific nationally and locally designated sites and biodiversity features that are likely to be impacted by the proposed development. It is our view that these or similar clauses should be included within these policies to highlight the presence of the designated sites and ensure appropriate mitigation and/or compensation is provided within the development control process. If the suggested clause in relation to Green Infrastructure is included in CSD4 this requirement does not need to be reiterated within the site or area specific policies.