

Date: 08 June 2012
Our ref: 55650
Your ref: n/a



BY EMAIL ONLY

The Inspector
Medway Core Strategy Examination
Medway Council
Chatham
ME4 4TR

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
CREWE
CW1 6GJ

T: 0300 060 3900

Dear Ms Graham

Medway Council Core Strategy Development Plan Document (DPD) Examination in Public

Natural England's position re Matter 1 – Legal Process and Matter 5 - Lodge Hill Strategic Allocation

Further to my discussions with the Programme Officer, Alison Rock, I set out in the following sections Natural England's position in respect of matters 1 and 5 of the examination of Medway Council's Core Strategy:

Matter 1 – Legal Process and Requirements

In our response to the draft publication Core Strategy (14 October 2011) Natural England raised a number of concerns due to the absence of a Habitats Regulations Assessment (HRA) that is required under Regulation 102 of the Habitats and Species Regulations 2010 (as amended 2011).

Since then we have worked with Medway Council on the development of the HRA. This takes account of our concerns, in particular it references the work of the North Kent Environmental Planning Group (of which Medway Council is a member) that is investigating the possible link between bird declines in the three North Kent Special Protection Areas (SPAs) and recreational disturbance. We support the recommended amendments in HRA and provided that these are incorporated into the Core Strategy Natural England have no further issues in respect of matter 1.

Matter 5 – Lodge Hill Strategic Allocation

Natural England has been in discussion with Medway Council in respect of the Lodge Hill allocation for some years. While the site is close to Chattenden Woods Site of Special Scientific Interest (SSSI) it has been Natural England's view that it would be possible for potential urbanising impacts on the SSSI to be accommodated by an appropriate mitigation package i.e. site layout, appropriate buffers, access management, creation of new habitat. Confidence that the Core Strategy can deliver a mitigation package is given in the cross cutting policies, in particular policy CS6 which states "*Any negative impact on recognised wildlife habitats or other biodiversity features should be avoided or minimised through the appropriate siting and/or design of development. Where the negative impact cannot be avoided, but the importance of the development is considered to outweigh the impact, then environmental compensation will be*

Natural England
Foundry House
3 Millsands
Riverside Exchange
Sheffield S3 8NH

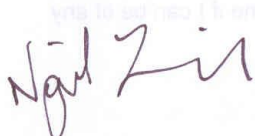
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provided by the creation by the developer of new habitats or features on other suitable sites and their long term management will need to be secured. Compensation will normally be provided on more than a like-for-like basis, in order to secure both the maintenance and enhancement of biodiversity.” Natural England has not therefore opposed this allocation.

Earlier this year an outline planning application was submitted for Lodge Hill to which Natural England objected due to a lack of information on the impacts to Chattenden Woods SSSI, recreational disturbance on the North Kent SPAs, protected species and other biodiversity. Since then further information has been submitted that has enabled us to resolve the species issues but currently we are maintaining the objection in relation to potential cat predation impacts on the breeding bird assemblage within the SSSI and clarification on recreational disturbance issues on the SPAs. We continue to engage with Medway Council and the applicants to reach a solution.

We are unable to attend the Examination on the 14 June when Matter 5 is being discussed but will be happy to provide further comments on any matters that are raised.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Nigel Jennings', is written over a light blue rectangular stamp. The stamp contains some faint, illegible text.

Nigel Jennings

Lead Adviser

Direct Dial: 0300 060 4787

Fax: 0300 060 4798

E-Mail: Nigel.jennings@naturalengland.org.uk