

Date: 19 May 2022
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Dear Planning Policy Team

Regulation 16 Consultation on the draft Cliffe and Cliffe Woods Neighbourhood Plan

Thank you for your email of the 25 March 2022 consulting Natural England on the Regulation 16 Consultation for the draft Cliffe and Cliffe Woods Neighbourhood Plan and the accompanying Design Guide.

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.

Natural England welcomes and is broadly supportive of the draft Neighbourhood Plan objectives and policies but have a number of comments which are provided below. We feel these would help strengthen the Plan and ensure impacts to the natural environment are avoided or fully mitigated whilst maximising the environmental opportunities and outcomes for people and nature.

Draft Cliffe and Cliffe Woods Neighbourhood Plan

Policy SUSDEV5: Infrastructure Sufficiency Statements omits green infrastructure from the list that developments will be expected to secure. We would recommend that the Policy be strengthened by including reference to the emerging Medway wide Green and Blue Infrastructure Strategy and the national Green Infrastructure Standards¹. Including green infrastructure within Policy SUSDEV5 will help ensure that the Neighbourhood Plan realises the benefits for people and nature that development can deliver, in accordance with the National Planning Policy Framework and the Environment Act.

Whilst it is noted that the Neighbourhood Plan does not include any specific housing allocations, deferring consideration of these to emerging Medway Local Plan, a number of policies are proposed to shape and guide any housing developments which come forward. Policy H2: Housing Infill details that 'Within the Neighbourhood Plan area proposals for new housing development on Previously Developed Land, within the existing village boundaries (Map 2) will be supported in the form of small-scale infill development within or immediately adjoining the boundaries of its two main villages'.

Cliffe Woods lies immediately adjacent to part of the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI) which is notified for its ancient and semi-natural woodland and grassland habitats and supports the largest population of breeding nightingales in the country. Similarly, Cliffe village lies within close proximity to the South Thames Estuary and Marshes SSSI and the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site. Housing developments,

¹ Available from <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

including small scale infill developments, within close proximity to the sites have the potential to result in significant impacts to the designated sites. As such, Natural England would recommend that additional wording is included within Policy H2 to avoid such impacts along the following lines ‘...its two main villages *providing they will not result in impacts to designated nature conservation sites*’.

Policy CF2: New and Improved provision [of community facilities] could be strengthened by including reference to the emerging Medway wide Green and Blue Infrastructure Strategy and the national Green Infrastructure Standards². Including reference to green and blue infrastructure within Policy CF2 will help ensure that the Neighbourhood Plan realises the benefits for people and nature that development can deliver, in accordance with the National Planning Policy Framework and the Environment Act

Policy E&H2: Biodiversity requires all development to ‘protect and enhance biodiversity in line with the NPPF and Medway Local Plan requirements’ which is supported by Natural England. Biodiversity Net Gain is contained within the Environment Act and the policy wording could be strengthened to include reference to the Local Nature Recovery Strategy and the Medway Green and Blue Infrastructure Strategy. A strengthened wording could include ‘Development must *deliver demonstrate* a net gain in biodiversity... Such measures should contribute to the Medway Green and Blue Infrastructure Strategy and the Local Nature Recovery Strategy’. These amendments will help ensure that developments maximise the environmental outcomes for people and nature

Given the rich natural and cultural heritage within the Neighbourhood Plan area, Natural England considers that the wording within Policy ECON&EMP2: Recreation and Tourism could be strengthened to ensure that impacts are avoided or fully mitigated. A possible amendment to the wording is ‘Their siting and scale *and ensure that impacts have strong regard to* on the character and the historic, natural environment and disruption of wildlife assets of the Neighbourhood Plan area *are avoided or fully mitigated*’

Natural England is supportive of opportunities for people to recreate and engage with the natural environment where this does not result in impacts to wildlife. We note that Policy Infra 6: Public Transport – Cycling in the Neighbourhood Area and the accompanying Plan proposes cycle access along the coast. The coastline within the Neighbourhood Plan area falls within the South Thames Estuary and Marshes SSSI and the Thames Estuary and Marshes SPA and Ramsar site. Any proposals to provide cycle routes through these sites will need to ensure that impacts are avoided or fully mitigated and we would recommend that this is reflected within the Policy.

Cliffe and Cliffe Woods Design Guidelines

As with the Neighbourhood Plan, Natural England is broadly supportive of the accompanying Design Guidelines. There are significant opportunities for the Design Guidelines to promote the delivery of Green and Blue Infrastructure, nature based solutions for climate change adaptation and mitigation and the Local Nature Recovery Strategy to maximise the benefits for people and nature. Natural England would recommend, and support, a stronger integration of the natural environment within the Design Guidelines.

I hope these comments are helpful and we would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact [redacted] or by email [redacted]. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

[redacted]
[redacted]

² Available from <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

Sussex and Kent Team