

Medway Local Plan Examination

Natural England's comments - Matter 6: Natural Environment

Issues

Whether the Plan and its relevant policies are clear, positively prepared, justified, effective and consistent with national planning policy particularly relating to the mitigation of, and adaptation to, climate change.

Whether the Plan and its relevant policies adequately and effectively protect and enhance biodiversity interests and valued landscapes.

Whether development is being directed away from areas at the highest risk of flooding. Whether the Plan and its relevant policies adequately and effectively deal with pollution-control related matters.

Questions

Policy S2: Conservation and Enhancement of the Natural Environment

- 6.7 Would the policy be effective with its length, the number of biodiversity and landscape matters that it covers and as a number of subsequent strategic policies in this chapter return to the same matter?

In its current form Natural England, we do not consider Policy S2 will be effective in conserving and enhancing the natural environment. We suggested a number of changes to Policy S2 in Sections 2.5-2.16 of our response to the Regulation 19 Consultation (our reference 517270, dated 11 August 2025) and with these, we consider the policy will be effective and accords with national policy and other relevant legislation.

- 6.9 Where the policy refers to where development will only be permitted where it demonstrates that it will protect and enhance the natural environment, biodiversity and landscape interests, is this consistent with national policy?

Please see our answer to question 6.7 above.

Policy S3: North Kent Estuary and Marishes Designated Sites

- 6.13 Is the policy reflective of the Submission Habitat Regulations Assessment (HRA) (A4.1 to 4.3), as the HRA was published around the same time as the Plan was submitted for examination?

Whilst this question appears primarily for the Council, Natural England has worked collaboratively with the Council on their Habitats Regulations Assessment and have provided our detailed advice on the final HRA in the additional consultation earlier this summer. Subject to our advice and suggested amendments to Policy S3 in our Regulation 19 consultation response, we consider that the policy will be effective.

6.15 How has the 16 metres distance under the policy (fourth paragraph of the policy) for requiring greater mitigation measures been derived?

Natural England understood that this was in relation to coastal flooding rather than recreational disturbance and we recommend that this was moved to a separate section but will defer to the Council to confirm.

6.16 How does seeking mitigation and avoidance measures outside of the 6 kilometre (km) Zone of Influence (fifth paragraph of the policy) from the Strategic Access Management and Monitoring Strategy (SAMMS) accord with development within the 6 Km Zone of Influence these designated sites having to make a tariff contribution (second paragraph of the policy)?

The evidence underpinning the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy (SAMMS) detailed that the majority of visitors to the coastal sites came from within a 6 kilometre zone of influence. That said, given the draw of the coast, large developments within the 6-10km zone were considered likely to result in some increase in recreational impacts. In this 6-10km zone, consideration of the impacts will need to be on a case-by-case basis for the specific development, considering the underpinning survey evidence and any site-specific surveys. The mitigation is likely to include a financial contribution financial contribution to the SAMMS based upon the proportion of residents who may recreate within the designated sites (as determined by the surveys).

6.20 Would the policy be effective in terms of what it is seeking to achieve, in reading the various paragraphs together?

With the amendments suggested to Policy S3 in our Regulation 19 Consultation (our reference 517270, dated 11 August 2025), Natural England considers that the Policy will be effective.

Policy S6: Kent Downs National Landscape

6.31 Is Policy S6 consistent with national policy in respect of the level of protection which it applies to the national landscape for considering development proposals?

6.32 Are the criteria which are set out in Policy S6 consistent with the objectives of the Kent National Downs Landscape?

6.33 Does all development within the national landscape under Policy S6 need to be accompanied by a landscape assessment/landscape visual impact assessment, or only development which is of a defined scale?

Natural England provided suggested additional wording in Section 2.21 of our Regulation 19 response and subject to this being included, we consider that Policy S6 is consistent with the requirement of national policy.

Policy DM4: Noise and Light Pollution

6.54 Is dark skies a light pollution consideration for this policy, or elsewhere in the Plan?

Natural England considers this is an important consideration for both the Kent Downs National Landscape and designated conservation sites and wider biodiversity and considers that the Plan addresses these matters in the relevant policies.