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Kent Wildlife Trust

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The Planning Policy Team
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Dear Sir/Madam

Community Infrastructure Levy Dartford's Draft Charging Schedule Consultation

Thank you for consulting Kent Wildlife Trust on the Community Infrastructure Levy Draft Charging Schedule.

Draft Charging Schedule

It is our view that the amounts specified within the Draft Charging Schedule appear to be fair in most instances, however this is a new process and Kent Wildlife Trust can only compare this schedule with Sevenoaks. As stated in previous comments to Tania Smith, due to the differing levels of development between the two authorities, there is likely to be a much higher pressure on the natural environment within Dartford than Sevenoaks, and alternative natural open space is likely to be required to deflect the new residents from using the European SPA network running throughout the adjoining districts of Swale Gravesham and Medway.

We are concerned regarding the low levels of funding being required from new hotels within the area. Such facilities will increase visitors to Dartford. It is highly likely that at least a proportion of these visitors will wish to visit the marshes and estuaries, within the adjoining districts, either to view the wildlife or to undertake other recreational activities.

The National Planning Policy Framework sets out the protection that should be afforded to Natura 2000 and Ramsar sites within paragraph 113

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.

For this reason, it is our opinion, that to ensure hotel visitors are deflected away from the SPA and Ramsar networks, funding should be secured to provide landscape scale enhancement projects within the boundaries of Dartford. We therefore **object** to the amount of £25 allocated for hotels, as we do not believe this will provide adequate funding to enable alternative natural open space to be provided, and is therefore not in conformity with national policy.



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Protecting Wildlife for the Future

Infrastructure Delivery Plan

We have concerns regarding the lack of projects identified for creation of natural habitat creation, enhancement, and extension, within the Infrastructure Delivery Plan. We understand that the work being undertaken by the North Kent Environment Planning Group is not at a stage where costs of mitigation to protect the European network can be ascertained. We understand that the Infrastructure Delivery Plan is a living document and these costs can be added when known.

However, irrespective of the mitigation required for the protection of international sites, under the NPPF Local Authorities are required to provide landscape scale enhancement as part of Local Planning. Paragraph 114 which states that:-

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;

Within the Core Strategy Policies CS11 and CS12 Kent Wildlife Trust was impressed by the scope of ecological projects to be implemented. Due to the level of natural habitat creation, enhancement and extension that was to be delivered, we were reassured that significant gains would be made for biodiversity within the plan period. Projects identified included

CS11

- *Enhancement of rural reaches of the Darenth Valley*
- *Darenth Heath- Restoration of heathland*
- *Darenth Woods natural habitat enhancements*
- *Former Mabledon Hospital –enhancement of areas of ecological value*

CS12

- *Dartford Marshes –delivery of Managing the Marshes Project*
- *Creation of a nature reserve east of Stone Lodge*
- *Significant biodiversity improvements at the development sites including Ebbsfleet Valley, Swanscombe Peninsular and Northern Gateway.*

In addition to the above projects Policy CS12 also commits to *Protecting and enhancing existing open spaces, including those shown in Diagram 8 and those identified and designated as locally important, the diverse landscape character areas of nature conservation value, Sites of Special Scientific Interest, National Nature Reserves and Local Wildlife Sites, community and ancient woodlands as well as priority habitats and species both in the urban and rural area. Biodiversity enhancements will be focused on the Biodiversity Opportunity Areas. Protection and enhancement of biodiversity on brownfield development sites will be based on survey data.*

The Infrastructure Delivery Plan identifies the green infrastructure that is to be provided through s106 and CIL. Green infrastructure within the strategic development sites is identified to an extent, however this largely comprises urban parks and parkland, which is likely to be formal and will do little to protect and enhance biodiversity. The only natural habitat identified within the plan appears to be the projects relating to Dartford Marshes and Stone Lodge, which have yet to gain full funding. Contributions to the above projects are not being required from CIL, with partners expected to obtain funding from other sources.

We are extremely concerned that the ambitious plans within the Core Strategy will not be delivered and would wish to see a number of landscape scale projects, at least partly funded by development, to ensure alternative natural habitat is delivered. We therefore **object** to the Infrastructure Delivery Plan as we do not feel it is in conformity with national or international policy.

We understand the difficulties prioritising projects for CIL and will endeavour to provide any help we can in the delivery of the above projects. We do not feel that the grey infrastructure projects should be given precedence at the expense of creation of the green infrastructure.

I hope we can work constructively both individually and within the North Kent Environment Planning Group to try to resolve these issues.

Yours sincerely

Debbie Salmon
(Conservation Officer, Policy and Planning)