



Sevenoaks Core Strategy
Examination in Public

Additional information by

Kent Wildlife Trust

Representor ID 412217

Matter 1 Spatial Strategy/Distribution of Development

To be held on 5th October 10 O'clock

Amount of decisions left for future development plan documents and Supplementary Planning Documents.

1. It is the view of Kent Wildlife Trust that the issues appertaining to the Green Infrastructure should have been covered in detail within Sevenoaks District Council's Core Strategy to ensure clarity regarding developers obligations under PPS9 to "*maintain, and enhance, restore or add to biodiversity and geological conservation interests*" (*Key Principle ii*) The Key principles state that policies should be based on up to date information regarding the relevant biodiversity resources of the area (i), appropriate weight being attached to designated sites of international, national and local importance (ii), with plans and policies taking a strategic approach to the form and location of development and the contributions sites, areas and features can make to conserving these resources.(iii)
2. As stated within the Statement of Common Ground submitted on the 3rd September 2010 the minor amendments proposed by Sevenoaks District Council in relation to Policies SP9, SP10, SP11 and supporting text clarify the requirement for developers to provide Green Infrastructure through new development, contribute to landscape scale enhancement projects and conserve biodiversity in general. For this reason we now feel that the Core Strategy meets national policy.
3. However it is Kent Wildlife Trust's view that more detailed Green Infrastructure work should be undertaken within the Site Allocations Development Plan Document with the following areas being covered.
 - Mapping of habitat corridors and Green Infrastructure on a landscape scale covering the rural and urban areas within Sevenoaks District (PPS9 paragraph 12)
 - Collection and collation of up to date ecological information regarding the designated sites, priority habitats and species, ancient woodland and biodiversity present within the District. (PPS9 Key Principle ii, paragraphs 4,

5, 9, 10 and 11.and the Natural Environment and Rural Communities Act 2006 (NERC Act) ss40 and 41)

- Formulation of clear policies to ensure the protection of the designated sites, habitats and species detailed above. (PPS9 Key Principle ii paragraph 4, 9, 10 and 11.)
 - Identification of landscape scale projects for the restoration and creation of natural habitat and formulation of clear policies as to how the projects are to be delivered with identification of funding streams and project partners (PPS9 paragraph 5 (ii) PPS12 Paragraph 4.45)
 - Formulation of policy regarding biodiversity design within development and developers obligations to contribute to the establishment of a landscape scale Green Infrastructure. (PPS9 Paragraph 13 and 14)
4. We believe delivery would best be achieved by forming a Green Infrastructure Partnership, incorporating all relevant statutory and non statutory organisations involved in nature conservation and partners responsible for the other functions of the Green Infrastructure. Such partnerships have been established in North and East Kent and in Tunbridge Wells and are proving a valuable vehicle for co-ordinated delivery.

Is the Spatial Vision over generic /reliant on topics?

5. Kent Wildlife Trust feels that the Spatial Vision and the Strategic Objectives are too generic in regards to nature conservation and do not provide a clear commitment to provision of Green Infrastructure and habitat networks. Although there is a commitment to the conservation and enhancement of the natural environment PPS9 advocates the provision of Multifunctional Green Infrastructure within new development and the restoration, creation and connection of habitats to relieve fragmentation and isolation and protect and buffer designated sites and priority habitats already present. National policy envisages a net gain to biodiversity not just the halt of decline. As the spatial vision and objectives so not contain a commitment to the provision of multifunctional Green Infrastructure or the creation of landscape scale habitat

networks it is our view that the vision and objectives are not in conformity with national policy and guidance contained within PPS9 and supporting documents.

6. The vision and objectives could be strengthened to provide a firm commitment to habitat creation and restoration and Urban Green Infrastructure which would establish a resilient policy framework on which further work within the Site Allocations DPD can be based. We respectfully submit the following suggestions for changes.

- The Spatial Vision

At the end of paragraph 1 after protecting the environment we recommend insertion of and should incorporate multifunctional Green Infrastructure. A landscape scale network of natural habitat corridors will be created throughout the district modelled on the Biodiversity Opportunity Areas.

- Strategic objectives and delivery

We recommend a further objective be inserted within issues 6 To establish a network of habitat corridors throughout the district