



Planning Policy
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 423203
Ask for: Alessandra Sartori
Email: alessandra.sartori@kent.gov.uk

BY EMAIL ONLY

28 April 2023

Dear Sir/Madam,

Re: High Halstow Neighbourhood Plan - Regulation 16 Consultation

Thank you for consulting Kent County Council (the County Council) on the High Halstow Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

Chapter 1: Introduction

Heritage Conservation: The County Council acknowledges that aspects of High Halstow's heritage are mentioned throughout the current Neighbourhood Plan. However, the full role that the history of the Neighbourhood Plan area has played in shaping the landscape, settlement and landmarks of High Halstow is not clearly demonstrated, as it is divided among the landscape, settlement and community sections. The role that the surviving heritage can play in the future of the Neighbourhood Plan area has also not been considered. The County Council would therefore recommend the inclusion of a section on the history and heritage of the Neighbourhood Plan area that explains the history of High Halstow in more detail and shows how the modern Neighbourhood Plan area is derived from this history.

Chapter 2: High Halstow 'today'

Heritage Conservation: The County Council notes that the text in this section describes the current character of High Halstow, but it does not mention that this is due to historical processes as much as landscape and geology. The marshland has been exploited by humans for thousands of years and they have left traces of this in the form of salt mounds, drainage ditches and seawalls, as well as traditional tracks and routeways and agricultural structures. These areas were exploited by people living on the upland spine of the Hoo Peninsula as reflected in the prehistoric settlement evidence seen in archaeological excavation in and around the village. The continuity of this history is undescribed in this section but is largely what enables and underpins the rich biodiversity described in detail. It is advised that the role that heritage has played in shaping the landscape and the life of the people who live in it is expressed more strongly in this section.

Demographic profile

Highways and Transportation: The County Council, as Local Highway Authority, has concerns with the impact of a major development in Medway on the Kent highway network. The introduction of development on Land East of High Halstow would double the size of the existing village. Paragraph 2.11 states “*The majority of the High Halstow population travel to work by car (76%)*”. This is considered to be high, although reflective of a rural village. It is therefore important that high quality walking, cycling and public transport links and facilities are provided in order to ensure new residents do not replicate this high car-based mode share. The proposed policies are considered to support a reduction in car-based mode share.

Chapter 3: High Halstow 'tomorrow'

Heritage Conservation: The County Council welcomes the strong commitment to protect and enhance the landscape character and heritage assets of the Neighbourhood Plan area.

Objectives

Heritage Conservation: At present, none of the objectives mention the conservation of the historic environment. The County Council therefore recommends that Objective 07: Sustainable Environment – ‘*To provide a sustainable environment for the residents and wildlife of High Halstow whilst being mindful of conserving an ecological balance*’, is replaced with the following text: ‘To provide a sustainable environment for the residents, heritage and wildlife of High Halstow whilst being mindful of conserving an ecological balance’.

Chapter 4: Community

Policy HH C2: Education

Highways and Transportation: The County Council supports this policy which ensures that the design of new schools promotes walking, cycling and minimising trips by car, including school streets. Whilst this relates to the primary school and will therefore have limited impact

on Kent's highway network, it is important that high quality links are also formed with a secondary school, to reduce the proportion of students who may be driven/drive themselves.

Heritage Conservation: The County Council notes that there are substantial pressures on the health and social care of Kent's population and it promotes the use of individual and community assets to provide a more person-centric system. As such, heritage can play an important role in the contribution of the arts to person-centred, place-based care through means such as arts-on-prescription activities, cultural venues and community programmes. The historic environment, archaeology and heritage form part of our experience of being human and can provide individual as well as collective opportunities to engage with arts and culture whilst having positive effects on our physical and mental health and wellbeing in the process.

Chapter 5: Environment

Biodiversity: It is noted that aspects of the County Council's previous advice in respect of biodiversity matters have not been incorporated into the Regulation 16 version of the Neighbourhood Plan. These comments therefore include the previous advice provided on 17th September 2021 as part of the Regulation 14 consultation and the County Council would urge the Steering Committee to have due consideration of the matters raised.

The County Council would also highlight that Local Nature Recovery Strategies (LNRS) are a new, England-wide system of spatial strategies that will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits. Work is being undertaken on an LNRS for Kent and is therefore encouraged to be included in any future revisions of the Neighbourhood Plan.

Natural Habitats and Biodiversity

Heritage Conservation: The County Council acknowledges that Sections 5.2-5.3 review the landscape character of the area, but they do not mention why this character came to be. Between 2009 and 2012, Historic England carried out the [Hoo Peninsula Landscape Project](#) which studied the peninsula using a range of field and desktop techniques. One of the products of this project was a detailed Historic Landscape Characterisation of the peninsula which reveals the time depth that can still be seen in the pattern of fields, tracks, boundaries and features of the landscape. The landscape that can be seen today is therefore not a natural one, but a human one. It is the Neighbourhood Plan area's largest heritage asset. In this section, the County Council would recommend that this historic character is described, and the link to the Historic England study is presented. The historic aspects of the landscape can therefore be considered alongside the natural or biodiversity aspects in decision-making.

Biodiversity: As stated in paragraph 5.11, the entirety of the parish is within the zone of influence of the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) for the Thames Estuary and Marshes Special Protection Area and Medway Estuary and Marshes Special Protection Area, and these areas are also both Wetlands of International Importance under the Ramsar Convention (Ramsar Site). Where additional housing is proposed, Medway Council is encouraged to ensure that the proposals fully adhere to the

agreed approach within the SAMMS. This is to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation before first occupation.

The County Council notes that the requirement for an Appropriate Assessment is determined by the competent authority¹ and is undertaken if a proposed plan or project is considered likely to have a significant effect on a protected habitats site. The Appropriate Assessment must consider the indirect effects on the designated features and conservation objectives, including principles contained within [Government guidance](#). A decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be considered when carrying out a screening assessment to decide whether a full Appropriate Assessment is needed under the Habitats Directive². Therefore, due to the need for an application for residential dwellings to contribute to the North Kent SAMMS, there would still be a need for an Appropriate Assessment to be carried out for this type of application. The County Council recommends that this is reflected in the Neighbourhood Plan.

However, on review of the Special Site of Scientific Interest (SSSI) Impact Risk Zones on the [Multi-Agency Geographic Information for the Countryside](#) (MAGIC) website, there are multiple SSSI Impact Risk Zones relevant to the different statutory designated sites within the Neighbourhood Plan area. Not all types of development in all of the risk zones will require either consultation with Natural England or a Habitats Regulations Assessment. The County Council therefore recommends amending paragraph 5.10 to the following:

'SSSI Impact Risk Zones³ cover the entirety of the parish is within the Impact Risk Zone of a SSSI as defined by Natural England. The SSSI Impact Risk Zone tool (available on MAGIC) will therefore need to be consulted for all proposals for development, alongside an assessment carried out by a suitably qualified ecologist⁴ where appropriate, to establish the requirement for within the parish will thus be subject to consultation with Natural England and trigger the need for a Habitats Regulation Assessment.'

The County Council also proposes changing the wording of paragraph 5.11 to the following:

'With regards to new residential development, the entirety of the parish is also within a six kilometre catchment of the Special Protection Area, zone of influence of the Thames Estuary and Marshes Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar site), as well as Medway Estuary and Marshes SPA and Ramsar site. In this area Therefore, the Interim Policy Statement adopted by Medway Council (2015) in respect of Strategic Access Management and Mitigation applies (and until such time as it is updated or replaced). This Policy Statement indicates that a financial contribution is payable to the Council for all new homes built in this area, which will be used to mitigate the recreational impacts of population increases on the SPA these designated sites. As mitigation measures cannot be taken into account when carrying out a screening

¹ [The Conservation of Habitats and Species Regulations 2017](#)

² [People Over Wind, Peter Sweetman v Coillte Teoranta \(C-323/17\)](#).

³ A GIS tool developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites.

⁴ Suitably qualified ecologists can be found using either the: [CIEEM Registered Practice Directory](#) or the [Environmental Data Services Directory](#).

assessment to decide whether a full Appropriate Assessment is needed under the Habitats Directive, there would still be a need for an appropriate assessment to be carried out for additional housing in this area.'

The County Council notes that paragraph 5.12 focuses on "the SPA". However, there are multiple designated sites (as already laid out in the Neighbourhood Plan text) within the Neighbourhood Plan area. There is also a pocket of ancient woodland and several other priority habitat designations outside of any statutory nature conservation designations. The County Council also recommends that reference is made to species of conservation importance and that reference to commitments in relation to biodiversity net gain is strengthened. This could be achieved by increasing the scope and altering the content of this paragraph, by splitting it into several paragraphs. The County Council would therefore advise amending paragraph 5.12 to the following:

'To preserve the quality of the natural environment, any proposals impacting on the SPA will be required to demonstrate that any potential impacts have been assessed and identify any mitigation measures required to offset these, with the potential to impact upon any statutory or non-statutory designated sites of nature conservation value⁵, priority habitats⁶, and protected⁷ or priority species⁸ (as assessed by a suitably qualified ecologist) will be required to demonstrate that these potential impacts have been addressed through an Ecological Impact Assessment (EclA) carried out in accordance with the [mitigation hierarchy](#).

All development should result in a net minimum of 10% biodiversity net gain, biodiversity gain and improvement to the quality of habitats. A minimum 10% biodiversity net gain should be aimed for, based on the use of the most up-to-date version of the [Natural England Biodiversity Metric](#) (version 3.1 at time of writing) and be fully in line with the biodiversity metric rules and principles as laid out in the relevant Biodiversity Metric User Guide. Off site provision is not preferred but where it On-site biodiversity net gain is preferred over off-site biodiversity net gain. However, where off-site provision is the only practical solution, it must remain as close as possible to the development site.

The Biodiversity Metric is a habitat-based approach. Species-based features are not included within the metric. However, species-based features such as reptile and amphibian hibernacula, insect hotels/log piles, bird and bat boxes and hedgehog highways will be encouraged within developments, as supported by the [National Model Design Code](#).'

Policy HH E1: Natural Environment

Biodiversity: The County Council is supportive of this policy, but would recommend the following alternative wording to strengthen it and adhere with the latest government terminology:

⁵ Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Wetlands of International Importance under the Ramsar Convention (Ramsar sites), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), and Ancient Woodland

⁶ As defined under Section 41 of the Natural Environment and Rural Communities Act 2006.

⁷ Legally protected species under the Wildlife and Countryside Act 1981 (as amended), The Conservation of Habitats and Species Regulations 2017 (as amended) and The Protection of Badgers Act 1992.

⁸ As defined under Section 41 of the Natural Environment and Rural Communities Act 2006.

~~1. All new residential development in the Parish will be subject to payment of an Appropriate Assessment and developer contributions as contained in indicated by the Medway Strategic Access Management and Mitigation Strategy, Guide to Developer Contributions and Obligations and underpinned by the Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. All proposals will be subject to consultation with Natural England and will need to demonstrate that the proposals, either alone or in combination with other plans or projects, will not adversely affect the integrity of a designated European or RAMSAR site.~~

~~2. Development will be expected to retain and enhance well established natural habitats, including mature trees, hedgerows and water features. All development will be required to result in a minimum net biodiversity gain of 10%, calculated based on use of the Natural England Biodiversity Metric v3.1 (or any subsequent updates to this) and submission of a biodiversity net gain plan submitted as part of the planning application. This applies to all developments, including smaller sites, which should make use of the Small Sites Toolkit published by Natural England as part of the biodiversity metric. The management plan should show how it is proposed to managed biodiversity net gains in perpetuity.~~

~~2. The SSSI Impact Risk Zone tool (available on MAGIC) will be consulted for all proposals for development, alongside an assessment carried out by a suitably qualified ecologist where appropriate, to establish the requirement for consultation with Natural England and the need for a Habitats Regulations Assessment. Where a Habitats Regulations Assessment is required, it will need to demonstrate that the proposals, either alone, or in combination with other plans or projects, will not adversely affect the integrity of an SAC, SPA or Ramsar site.~~

~~3. Any proposal involving the removal of natural environmental features must be justified and will be required to clearly demonstrate how the benefits from development will outweigh the negative impacts to the natural environment~~

~~3. Unless adequately justified, all proposals for development will be supported by an Ecological Impact Assessment (EclA) carried out in accordance with the latest Chartered Institute of Ecology and Environmental Management (CIEEM) best practice guidelines. Proposals for development will be expected to apply the mitigation hierarchy including firstly demonstrably attempting to avoid impacts to habitats of ecological value. This will include particular regard to the safeguarding of protected and priority species and the retention and enhancement of protected and priority habitats, as well other well-established natural habitats, including mature trees, and water features.~~

~~4. All development will be required to result in a minimum biodiversity net gain of 10%, calculated based on use of the latest Natural England Biodiversity Metric and evidenced within a biodiversity gain plan submitted as part of the planning application. This applies to all developments, including smaller sites⁹, which may instead be able to make use of the Small Sites Metric published by Natural England. To ensure the delivery of the biodiversity net gain, a biodiversity management and monitoring plan will also be required as part of development, covering a period of at least 30 years and capable of being rolled forward in perpetuity.~~

⁹ Some exemptions for very small sites will apply. These will be in line with outcomes of the biodiversity net gain consultation (unless or until changes come into force through further legislation/guidance). The list of exempted sites are available [here](#).

45. Any proposal involving the removal of natural environmental features must be justified and will be required to clearly demonstrate how the benefits from development will outweigh the negative impacts to the natural environment. If there is significant loss of ~~trees and shrubs~~ habitats of ecological value as part of development, then new provision will be expected elsewhere on the site or, if not possible on site, then elsewhere within the parish, providing equivalent coverage and an acceptable contribution towards the natural environment and local character.

56. Development on the edges of the settlement must avoid abrupt edges that lack vegetation or landscaping. In sensitive environmental locations, provision of comprehensive landscape buffering is encouraged. Native trees and shrubs must be used that reinforce the rural character of the area.

7. All development will include (where possible) new species-based conservation features focussed on protected and priority species (for example: reptile and amphibian hibernacula, insect hotels/log piles, durable (woodcrete/integrated) bird and bat boxes and labelled hedgehog highways).'

Policy HH E2: Countryside and Rural Landscape

Heritage Conservation: The County Council is pleased to see the archaeological interest in the landscape mentioned throughout this policy.

Policy HH E7: Flood risk

Heritage Conservation: The County Council notes that Sustainable Urban Drainage Systems (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets, for example, if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets, such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains in particular are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.

When SuDS are planned, it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record¹⁰ (HER) and by taking relevant expert advice. The County Council has produced advice for SuDS and the historic environment (Appendix A), which provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.

¹⁰ heritageconservation@kent.gov.uk

Towards Zero Carbon Development

Heritage Conservation: The historic environment has a significant role to play in the conservation of resources required for development and energy efficiency. Old buildings can sometimes be more energy efficient than newer ones and it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced a range of [guidance](#) on the role that heritage can play in mitigating climate change and historic building adaptation, and the County Council would advise that this is incorporated into the Neighbourhood Plan. The guidance demonstrates that historic structures, settlements and landscapes can be more resilient in the face of climate change and more energy efficient than more modern structures and settlements. This has also been updated in the Historic England report '[There's no Place Like Old Homes : re-use and Recycle to Reduce Carbon](#)'. The County Council would recommend that this is highlighted in the text, which currently suggests that only new buildings can be energy efficient.

Chapter 6: Movement

Highways and Transportation: The County Council, as Local Highway Authority, supports the overall vision of the Neighbourhood Plan.

The implementation of sustainable infrastructure is welcomed as a first step; however, it is the collective impact of prioritising sustainable modes of transport, place making, citing of local facilities and landscaping that is key to creating a place where people choose to walk, cycle and use public transport. The Neighbourhood Plan policies are generally supportive of this ethos.

Policy HH M1: Green Routes

Highways and Transportation: The County Council supports this policy but would recommend that reference is made to the need for cycle routes to be designed in line with [Local Transport Note 1/20](#), or any version that supersedes it.

Policy HH M2: Active Travel

Highways and Transportation: The County Council is supportive of this policy, but would advise that reference is made to cycle parking for adapted bikes. For example, for cargo bikes or for those with mobility issues who may require a larger cycle.

Project / Aspiration HH Mb: New Walking and Cycle Routes

Highways and Transportation: This policy states that "*The Parish Council is keen to work with partner organisations to explore the feasibility of delivering new and or improved walking and cycling routes in the Parish, including: Routes between the existing settlement area, development on land to the east of High Halstow and the proposed new railway station...*". The County Council understands that the delivery of the station may have been paused and the Parish Council should engage with Medway Council accordingly to ensure alternative reasonable sustainable transport opportunities are provided where possible.

Street Design and Safety

Highways and Transportation: The County Council supports the inclusion of a design code, as this will help to deliver the vision of the Neighbourhood Plan.

Policy HH M5: Street Design

Highways and Transportation: This policy states “... development east of High Halstow will seek to provide off line, segregated cycle and pedestrian routes adjacent to Britannia Road and Christmas Lane where possible. The character of Britannia Road and Christmas Lane, reflected in its width and presence of vegetation along it, shall be retained, but with a segregated pedestrian and cycle route running parallel to though set back from the road alignment”. Paragraph 6.33 states “Urbanising features shall be avoided wherever possible, except where that road section already incorporates such features (e.g.: footways) or where required for road safety purposes”. The County Council supports the requirement for segregated walking and cycling routes and the aim of retaining the rural characteristics of the village, but is concerned that the routes suggested would not be overlooked and therefore be unattractive, particularly in the evenings. The County Council would therefore request that appropriate, safe, attractive and overlooked routes are provided to key destinations.

New Technology and Transport Solutions

Highways and Transportation: The County Council welcomes the inclusion of new technologies such as Mobility as a Service (MaaS); parcel collection points; mobility hubs which are spaces that bring together different modes of sustainable transportation and improve the public realm; and electric charging points in paragraph 6.39, which would all assist in reducing the impact on the local highway network. Consideration could also be given to car clubs, which help to replace private car ownership (particularly second cars) and reduce the number of short trips made by private car.

Chapter 7: Place Quality

Highways and Transportation: The County Council supports Objective 6 – Traffic, although would recommend that public transport is included.

Heritage Assets

Heritage Conservation: The County Council considers that the current text in paragraph 7.9 underplays High Halstow’s heritage. The Neighbourhood Plan area contains a wealth of heritage assets spanning thousands of years of life in the parish. The Kent HER contains more than 160 records from prehistory to the Cold War and includes landscape features, listed and/or historic buildings, archaeological discoveries and monuments, and stray finds. Few of these are designated - only one scheduled monument and seven listed buildings - but a number of the non-designated monuments are of commensurate importance. These include Roman and Medieval salt-working sites that are visible in the marshes today, a probable bronze age barrow close to the village, and perhaps most significant among the

non-designated assets, numerous remains of the Second World War General Headquarters (GHQ) Stop Line that passed across the south of the parish. This was intended to be a crucial line of defence and includes numerous pillboxes, defensive earthworks and sentry posts. Many of these remain today and although the only designated military site in the parish dates from the First World War, together they represent a monument of national importance and a major landscape feature. The 'Whose Hoo' project that is in development intends to make the GHQ Stop Line the focus of extensive community activities and there is an opportunity for the High Halstow community to play a role here. It is therefore recommended that the Stop Line is mentioned in the text, as only military sites in neighbouring parishes are currently mentioned.

Policy HH PQ2: Non-designated Heritage and Archaeological Assets

Heritage Conservation: The County Council welcomes this policy, but would note that Shade House is not the only non-designated heritage asset in the Neighbourhood Plan area. The Second World War Stop Line should also be included, as might some of the salt-working sites, the probable prehistoric barrow, many of the military sites, wharves/hards along the Thames and other sites too. It is recommended that the text clearly states that other sites and structures might be identified as non-designated heritage assets in the future. This could provide the opportunity for a community project and the County Council would welcome further discussion on this matter.

In respect of Clause 2, the County Council notes that military crash sites can only be excavated when licenced by the Ministry of Defence. To excavate without a licence would contravene the Protection of Military Remains Act (1986).

Land to the East of High Halstow

Highways and Transportation: In respect of paragraph 7.14, the County Council agrees that the supporting transport infrastructure would be required to support large scale development at High Halstow, otherwise the development would likely generate high levels of private car trips which would impact on the Kent highway network. Development that is to come forward on the Hoo Peninsula/as part of the Medway Local Plan will be subject to the appropriate processes and consultation with the County Council.

Policy HH PQ4: Land to the east of High Halstow

Biodiversity: The County Council previously suggested in the Regulation 14 consultation that the policy provisions for the allocation of this area should include specific protections for Fisher's Wood ancient woodland in accordance with Natural England Standing Advice¹¹, in line with paragraph 180 of the National Planning Policy Framework.

It is noted that protections for Fisher's Wood are still not specifically mentioned within this policy and the County Council would advise that such protections should be incorporated unless there is sufficient justification for not doing so.

¹¹ [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK](#)

General Comments:

Highways and Transportation: The County Council, as Local Highway Authority, notes that any applications for sites that are predicted to have an impact on the Kent highway network would need to be assessed by the County Council to determine whether they would result in a severe impact on the local road network. The County Council would welcome notification by Medway Council of any major application submissions which may impact on the Kent highway network.

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, recognises that there may be economically viable sand and gravel deposits (Taplow Formation) present in the Neighbourhood Plan area. These deposits should be subject to the presumption to be safeguarded, as the National Planning Policy Framework seeks to prevent needless sterilisation of finite mineral deposits that may have economic characteristics. The Neighbourhood Plan is not seeking to allocate development in areas that may harm these deposits; however, it should be highlighted that land-won mineral safeguarding is a national planning policy consideration.

Supporting Documents

Design Code

Policy NO5: Biodiversity

Biodiversity: The County Council recommends that this policy specifically references key habitats and species for protection, and includes species-based conservation features focused on protected and priority species, as supported by the National Model Design Code. It is also recognised that the Biodiversity Metric is out of date, and the policy is therefore recommended to be revised to the following:

'Schemes must achieve a minimum 10% increase in biodiversity net gain as measured by using the latest Natural England Biodiversity Metric 3.0. Green corridors will be used to extend and enhance existing ecosystems, with protected and priority habitats and species safeguarded and enhanced in line with the mitigation hierarchy. Biodiversity net gain will not solely be measured through the latest Biodiversity Metric but shall include species-based conservation features such as woodcrete/integrated bird and bat boxes, hedgehog highways and bee bricks. Measures will also include Schemes must be designed to enhance biodiversity, including the retention of existing trees, hedges and habitats, the reduction of light pollution and the creation of new habitats, green roofs and ecological networks. in accordance with relevant guidance in relation to biodiversity such as the latest Institute of Lighting Professionals Bats and Artificial Lighting guidance.'

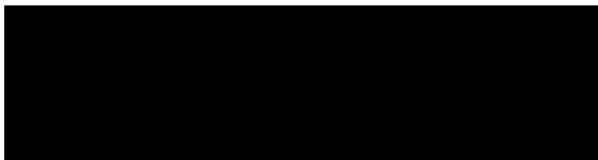
Basic Conditions Statement

Biodiversity: The County Council has reviewed the ecology matters in the document and recognises that a Habitat Regulations Appropriate Assessment has not been carried out.

In respect of sections 4 and 5, it is not clear to the County Council from the information provided within the Basic Conditions Statement that sufficient information is available to screen out likely significant effects upon nearby national site network sites. Where mitigation measures are needed to avoid likely significant effects, the competent authority would carry out an Appropriate Assessment. The County Council also considers that sufficient clarity is not currently available from Natural England that the approach taken within the Basic Conditions Statement is sufficient.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,



Stephanie Holt-Castle
Director for Growth and Communities

Encs:

Appendix A: KCC Guidance on the Historic Environment and Sustainable Drainage