

Dover District Green Infrastructure Strategy Cabinet Report – June 2024.

Appendix 1

Consultation Statement

May 2024

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1. Summary

- 1.1. Over 70 individuals and organisations responded to the Dover District Green Infrastructure Strategy consultation, which sought views on the content of the Strategy, the vision and objectives, along with information regarding green infrastructure-related projects to inform the development of the Action Plan.
- 1.2. The approach to the Green Infrastructure Strategy was well-received, with the majority of respondents supporting the Vision and Key Outcomes of the Strategy.
- 1.3. Where there were negative comments, these primarily expressed concern over the high-level nature of the Strategy and questioned the achievability of the aims, given the current limited detail of the Action Plan.
- 1.4. Many respondents actively engaged with the Strategy's themes, highlighting numerous specific and general concerns relating to green infrastructure, including the impacts of development on green spaces and climate change aims, to the impact of traffic on people's enjoyment of and access to green spaces, and river pollution caused by agricultural run-off, sewage leaks and littering.
- 1.5. One of the core aims of the consultation was to review the identified actions and projects, and to seek additional projects for the Action Plan. A significant amount of information was provided by consultees, with many responses providing additional detail to support the development of the identified projects, providing local information on local groups working on existing projects, and expressing aspirations for projects that could contribute to improving green infrastructure at a local level.
- 1.6. The Green Infrastructure Strategy and Action Plan have been updated in response to the consultation comments, including clarification that further review of the projects in the Action Plan will be undertaken to identify project leads and partners, scope the projects, and consider the funding and resources necessary to initiate the projects. It is also reiterated that delivery of the projects will be dependent on resourcing and funding availability.

2. Background

- 2.1. The Dover District Green Infrastructure Strategy aims to deliver a high-quality multifunctional network of green and blue spaces that benefit people and nature.
- 2.2. The Green Infrastructure Strategy draws on an extensive evidence base and identifies the needs and opportunities for the protection and enhancement of green infrastructure in Dover district, focusing on six Key Outcomes:
 - *Protected and restored nature*
 - *Greater resilience to climate change*
 - *Sustainable water management*
 - *Improved health and wellbeing for all*
 - *Sustainable places*
 - *Valued healthy landscapes.*

- 2.3. Actions that will contribute to the achievement of these Key Outcomes are set out in the Action Plan that forms part of this Strategy. The Council is committed to the delivery of three Core Actions embedded within the Green Infrastructure Strategy in order to guide investment in, protection of and enhancement of green infrastructure across the district.

3. Consultation Purpose and Methodology

Consultation purpose

- 3.1. The purpose of the consultation was to gather feedback from residents, parish councils and local and national organisations, including what they thought about our vision, objectives and content of the strategy and approach.
- 3.2. The consultation also sought to gather additional information for the projects listed in the Action Plan and other GI-related projects (existing or proposed) within the district that are not already captured in the Action Plan.
- 3.3. A full draft strategy was published on the DDC website and on the consultation website.

Methodology

- 3.4. The 6-week consultation ran from the 3rd October 2023 to 14th November 2023.
- 3.5. A survey was available to complete online. As part of the consultation, we also welcomed comments made by email or letter.
- 3.6. Consultation information was sent to Town and Parish Councils, neighbouring local planning authorities, Kent County Council, local and national environmental groups and statutory agencies. This included Natural England, Environment Agency, Historic England, Southern Water, Kent Wildlife Trust and CPRE. Consultees were encouraged to pass on the consultation details to other interested parties. The consultation was also promoted through social media and a press release.

Survey

- 3.7. We received a total of 44 responses to the online consultation survey.

Emails

- 3.8. 29 responses were received via email including correspondence from local residents, parish and town councils, local community groups, Buglife, Dover and Deal Green Party, Environment Agency, Historic England, Kent County Council, Kent Wildlife Trust, Natural England, Southern Water and Woodland Trust.

General Caveats

- 3.9. The results of this consultation survey are not statistically representative of the views of all Dover district residents.
- 3.10. The level of response, information gathered, and views obtained still provide a useful indicator of wider opinion and any important issues that will need to be considered.

- 3.11. Percentages used in this report have been rounded and may not add up to exactly 100%. Respondents were not required to answer all questions.
- 3.12. Responses have been summarised for the purpose of this consultation report. A full list of all comments made is available on the consultation website ([Dover District Council - Dover District Green Infrastructure Strategy \(objective.co.uk\)](https://www.dover.gov.uk/consultation/consultation-2022-23/consultation-2022-23-objective)).

4. Profile of respondents (sector)

- 4.1. 73 responses to the consultation were received including 37 from local residents, 9 from community groups, 11 from parish or town councils, 3 from wildlife non-governmental organisations, 4 from local authorities and 3 from government bodies.

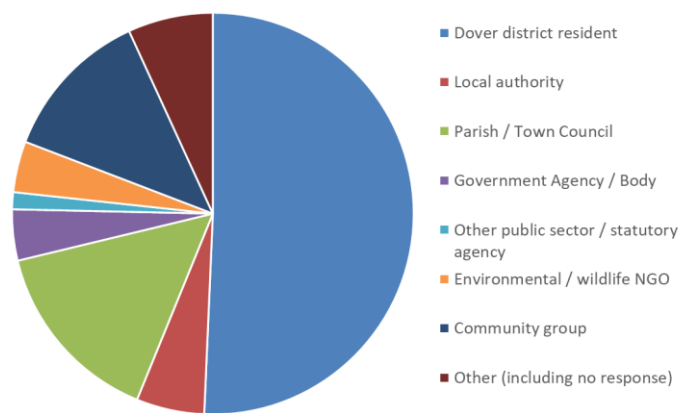


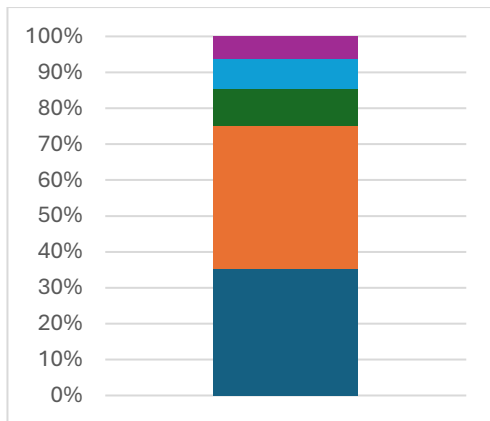
Chart 1. Profile of respondents

5. Key Consultation Findings

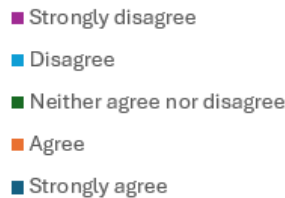
5A. Vision

- 5.1. The vision of the GI Strategy consultation draft is that:

Dover District in 2040 is a destination of choice in which to live, work, visit, learn and invest. Residents, workers, and visitors can engage with the high quality multifunctional green infrastructure that delivers a wide range of benefits to people and nature by improving health and wellbeing, contributing to climate change resilience and mitigation, supporting nature recovery and improvements in air quality, and attracting inward investment.



75% of respondents agreed with the Vision.



Commentary

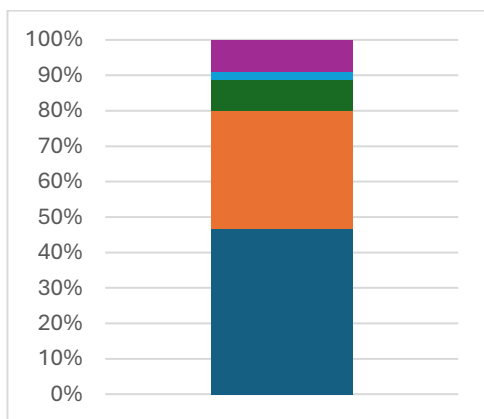
5.2. Respondents were asked to explain why they disagree with the vision. Several comments referred more broadly to the need for the strategy to be proactive and ensure that planning decisions reflect the aims of the strategy. The use of ‘management speak’ was criticised. Most respondents agreed with the vision, but also provided constructive suggestions to strengthen the language, and to increase the prominence of biodiversity within the vision.

Changes made in response to comments

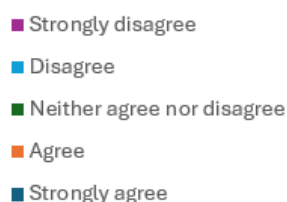
5.3. Amendments made to Vision to include additional reference to wildlife habitats. Paragraph changed to future tense.

5B. Themes and Outcomes

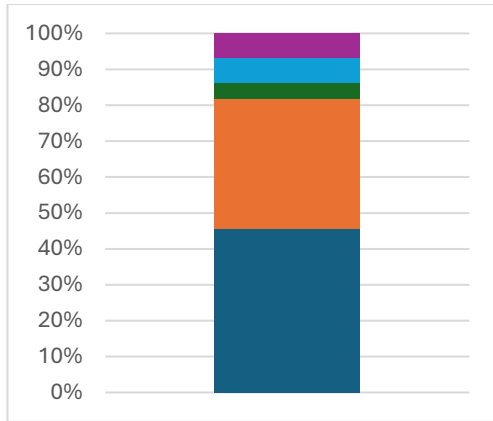
5.4. **Question: Do you support Key Outcome A: Protected and restored nature? Green infrastructure that delivers 'bigger, better, more and connected' habitat for nature.**



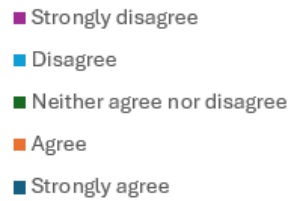
80% of respondents supported Key Outcome A.



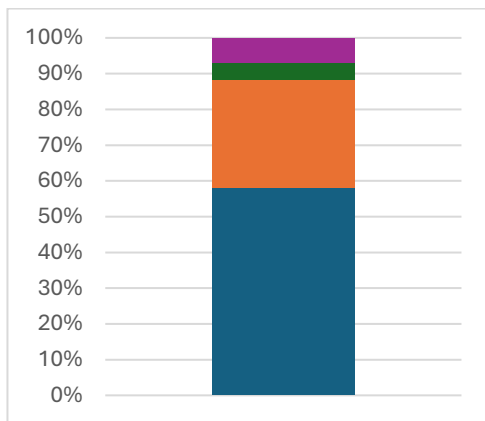
5.5. **Question: Do you support Key Outcome B: Greater resilience to changing climate? Green infrastructure that supports adaptation and resilience to the changing climate.**



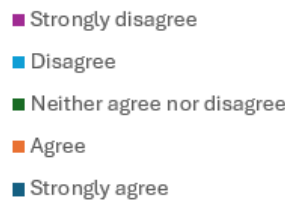
82% of respondents supported Key Outcome B.



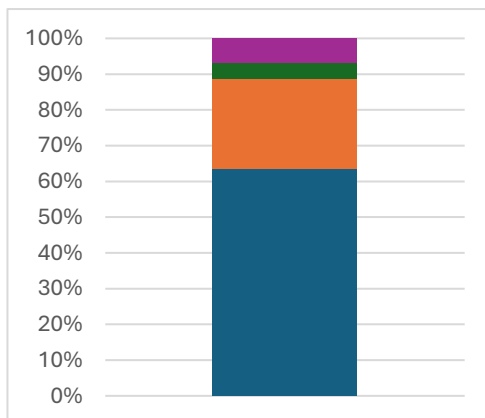
5.6. **Question: Do you support Key Outcome C: Sustainable water management?** *Green infrastructure that responds to and supports the management of flood and drought risks, improves water quality, restores river habitats, and connects wetland habitats.*



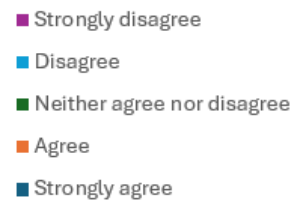
88% of respondents supported Key Outcome C.



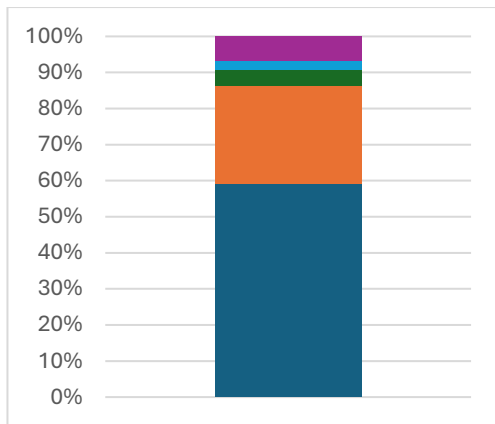
5.7. **Question: Do you support Key Outcome D: Improved health and wellbeing for all?** *Green infrastructure that improves the availability and accessibility of green places which boost the health and wellbeing of everyone.*



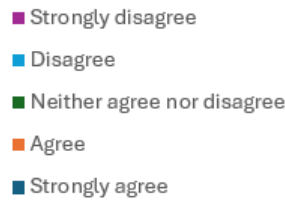
89% of respondents supported Key Outcome D.



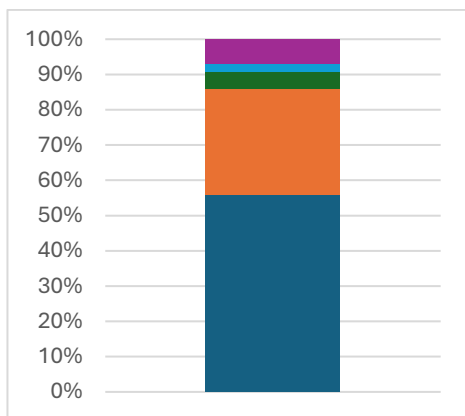
5.8. **Question: Do you support Key Outcome E: Sustainable places?** *Green infrastructure in new and existing communities that provides multiple benefits, so people and nature thrive.*



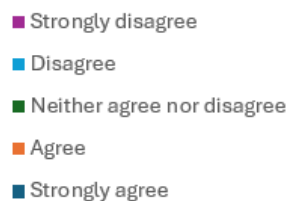
86% of respondents supported Key Outcome E.



5.9. Question: Do you support Key Outcome F: Valued healthy landscapes? Green infrastructure that conserves and enhances our landscapes, heritage, and sense of place.



86% of respondents supported Key Outcome F.



Commentary

5.10. Respondents were asked to explain why they disagreed with the Outcomes. The responses covered a wide range of specific and general concerns, highlighting existing issues and also providing suggestions for how the outcomes could be achieved. No responses provided any reasons for any Outcomes to be excluded from the GI Strategy.

5.11. Respondents made comments including the following:

<i>Key Outcome A: Protected and restored nature.</i>
Most important to look after what we have. Habitat connections and corridors should be a priority. Protection and enforcement are needed. Further detail needed in strategy, including a delivery plan.
<i>Key Outcome B: Greater resilience to changing climate</i>
Need to address traffic management, air pollution, carbon capture, water supply, tree planting. Development is in opposition to climate change resilience aims.
<i>Key Outcome C: Sustainable water management</i>
Impact on water management of agriculture, river pollution, development, sewage leaks. Area-specific comments relating to surface water flooding and aquifer pollution. Potential opportunities identified – rainwater harvesting, grass verges and green spaces to soak up rainfall. Value of trees in reducing runoff, intercepting rainfall, increasing infiltration of water and providing shade.

Key Outcome D: Improved health and wellbeing for all

Development has a negative impact on access to and availability of green spaces.

Limited number of actions relate to this outcome.

Project opportunities – traffic management, safe access to green spaces, maintenance of pathways.

Key Outcome E: Sustainable places

Existing limited access to green spaces.

Impact of litter and pollution on local green spaces.

Greater integration of GI in development needed.

Need to strengthen requirements for GI in development.

Increased enforcement of GI requirements needed.

Key Outcome F: Valued healthy landscapes

Protection of village identities needed.

Impacts of traffic, light pollution and development.

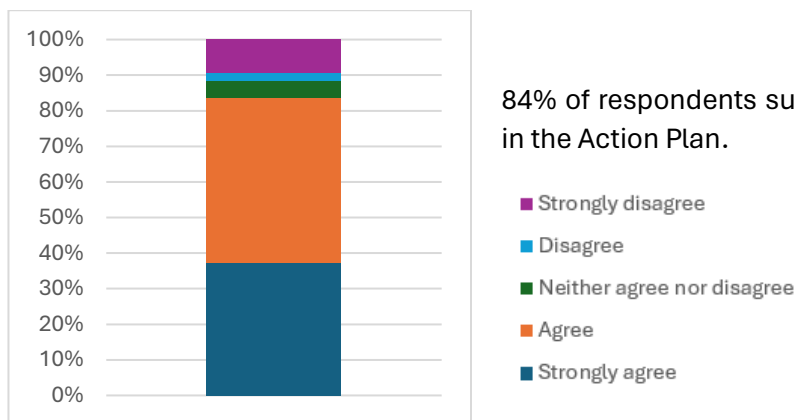
Need to include 'seascapes' in Key Outcome F.

Changes made in response to comments

- 5.12. Proposed change to Key Outcome F to 'Valued healthy landscapes and seascapes'. Where the highlighted issues and suggestions relate to an identified action, these have been incorporated into the Action Plan. New projects have been added if the draft did not include a relevant action.

5C. Appendix 1: Draft Action Plan

- 5.13. **Question: Do you support the projects identified in the Action Plan?**



84% of respondents supported the projects identified in the Action Plan.

Commentary

- 5.14. Respondents were asked to specify if there were any projects in the Action Plan that they did not support. None of the comments objected to a particular Action in the Action Plan.

- 5.15. Respondents were asked to identify projects in the Action Plan that should be prioritised. Numerous actions were considered to be a priority. The most frequently identified projects to prioritise were:

- *Develop and implement Chalk Grassland Action Plan*
- *Develop and implement Tree Strategy*
- *Develop and implement a Walking and Cycling Strategy*
- *Dover Town: Develop and implement plan to improve management of and access to Dover Town hills and valleys.*

- 5.16. Respondents were asked for any comments about specific projects in the Action Plan. In addition to suggestions for the projects identified above, other comments included:
- *Spatial Action for Dover Town: Develop and implement plan to improve management of and access to Dover Town hills and valleys* – Suggest the inclusion of the aim to ‘improve the biodiversity of Dover town’.
 - *Spatial action – rural Dover villages: create better access connections for health recreation and active travel* – Suggest creation of an off-road footpath between St Margaret’s at Cliffe and Martin Mill railway station.
 - *Spatial action – rural Dover villages: improve the biodiversity of rural Dover villages* – Suggest rewilding pockets of land at Preston recreation village ground.
- 5.17. Respondents were asked to identify any current / ongoing projects that are not already in the Action Plan. Numerous projects were suggested, but further investigation is required to determine if they are truly ‘current’ projects. The suggestions included:
- Alkham village green biodiversity enhancements
 - White Cliffs Countryside Partnership projects
 - St Margarets Bay Conservation Area Landscape Assessment
 - Wildlife Friendly Villages initiative
- 5.18. Respondents were asked for ideas / suggestions for further projects that could be included in the Action Plan. Suggestions included:
- Management of Sladden Wood
 - Grants and training in coppicing and hedgerow laying
 - Protection of historic routes from damage by trail bikes and quad bikes
 - Restoration of ponds at Chalksole Green
 - Improve access to the AONB
 - Create ‘behind the hedge’ route along Alkham Valley Road
 - Improve the Wingham River Valley (restore habitats, improve water quality, reduce pollution)

Changes made in response to comments

- 5.19. Respondents’ suggestions for the Action Plan have been incorporated where appropriate, either as additional or amended elements of projects already in the Action Plan, or as new projects. For any of the Action Plan projects to be taken forward, there will be a need for detailed scoping, identification of a project lead and partners, and identification of funding sources. The inclusion of a project in the Action Plan identifies it for further consideration but does not guarantee that it will be taken forward.

5D. Appendix 2: Scoping of Core Actions

Core Action 1: Develop and implement Biodiversity Net Gain Supplementary Planning Document Commentary

- 5.20. Respondents who disagreed with Core Action 1 were asked to explain why. Several respondents identified issues with implementation of biodiversity net gain, including lack of resources within LPAs, disagreement with the principle of ‘transplanting nature’, and the need for strong enforcement.

- 5.21. Respondents were also asked to provide comments / additional information regarding the scope of Core Action 1. It was suggested that enforcement measures should be included, along with clarification regarding the interaction between existing nature conservation law and policy with BNG.

Changes made in response to comments

- 5.22. Minor amendments / additions to Core Action 1 have been made in response to suggestions and as a result of publication of government guidance to support the secondary legislation. Further scoping of the project will be undertaken post-Adoption.

Core Action 2: Develop and implement Biodiversity Design Code for new development.

Commentary

- 5.23. Respondents who disagreed with Core Action 2 were asked to explain why. Concerns were raised over how and whether a Biodiversity Design Code would be implemented by developers.
- 5.24. Respondents were also asked to provide comments / additional information regarding the scope of Core Action 2. One respondent suggested that the Biodiversity Design Code should be strengthened by the use of the GI Planning and Design Guide, and GI standards such as Accessible Greenspace, Urban Nature Recovery Standard, Urban Greening Factor, Urban Tree Canopy Cover. Concerns were raised with the suggestion to include developers in shaping the strategy.

Changes made in response to comments

- 5.25. Minor amendments / additions to Core Action 2 have been made in response to suggestions and as a result of publication of government guidance to support the secondary legislation. Further scoping of the project will be undertaken post-Adoption.

Core Action 3: Develop, promote and implement Habitat Management Strategy for Biodiversity in public open spaces

Commentary

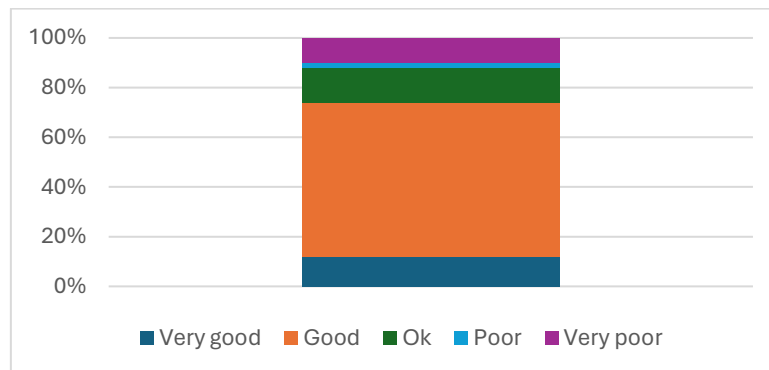
- 5.26. Respondents who disagreed with Core Action 3 were asked to explain why. Comments did not specifically disagree with Core Action 3 but noted lack of existing management and impact of development on wildlife habitat.
- 5.27. Respondents were also asked to provide comments / additional information regarding the scope of Core Action 3. Several respondents were keen to engage in and support the Core Action 3 project. Suggestions included engaging the community, providing case study examples of successful habitat management for biodiversity, and the need to raise awareness and address perceptions of management for biodiversity.

Changes made in response to comments

- 5.28. Minor amendments / additions to Core Action 3 have been made in response to consultation suggestions and following further discussions with DDC Parks & Open Spaces and Countryside. Further scoping of the project will be undertaken post-Adoption.

5E. Overall content of the GI Strategy

5.29. Question – Overall, how do you rate the content of the Dover District Green Infrastructure Strategy?



Commentary

5.30. Respondents were asked to explain what they liked or didn't like about the Strategy. Several respondents liked the ambition of the Strategy and noted that it is set out logically and includes good ideas and recognition of the value of green space. Comments also highlighted the need for greater focus on maintenance, protection and enrichment of existing assets. There were concerns over the impact of housing development and whether the aims could be achieved.

5.31. The need for more detailed mapping, for existing green infrastructure assets and opportunities, was identified.

Changes made in response to comments

5.32. Protection of existing green infrastructure is one of the core aims of the Green Infrastructure Strategy. It is acknowledged that there is no explicit action in the Action Plan for protection of green infrastructure assets, but it is embedded within the Key Outcome for 'Protected and restored nature'.

5.33. The wording of the Green Infrastructure Strategy has been amended to ensure it is clear that protection and enhancement of existing green infrastructure will be important to successfully deliver the aims of the Strategy.

5.34. Protection of green infrastructure in the development process is secured in the emerging Local Plan under Strategic Policy 13 and Strategic Policy 14. Mandatory biodiversity net gain for planning applications incentivises the protection and enhancement of existing habitats. In addition, actions delivered through the Green Infrastructure Strategy will strengthen the green infrastructure network, helping to protect assets.

5.35. It is acknowledged that detailed mapping of existing green infrastructure would benefit the Green Infrastructure Strategy, in terms of understanding the current status of assets and the threats they face, and to identify gaps and opportunities into which resources could be focussed. The Strategy has been amended to clarify that detailed mapping of existing assets will be undertaken, with a project to identify gaps and opportunities added to the Action Plan.