

**Leybourne Lakes Country Park Management Plan
Summary of Consultation Comments and Proposed Amendments**

Respondent	Comment	Proposed Amendment
1. East Malling & Larkfield Parish Council	<p>The Parish Council is supportive of the way the Country Park is managed and the proposal in the Plan and would like to record its appreciation of the continuing role of the local Liaison Committee.</p> <p>The Parish also supports the need to achieve a balance between the nature conservation value of the Country Park and its recreational importance for local people in the Borough and supports the sites proposed designation as a Local Nature Reserve.</p> <p>It is felt that in striking the balance between the users of the park is important to ensure it does not become commercialised but continues as a Country Park rather than say a town park or open space/playing field.</p> <p>The Parish supports the idea of a “classroom” for use when groups of children visit the site provided the building is well designed and sited so it fits in with the rural nature of the site.</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted.</p>
2. Historical Interest (Local Resident)	Supportive of the proposed Plan	Comments noted.
3. Park Visitor (Local Resident)	<p>Supports the Management Aim of the Plan to provide low intensity recreational use compatible with its nature conservation features and strongly supports the application for Local Nature Reserve status.</p> <p>Supports objective 42 to provide additional walking routes and the concept of an education room. In regard to the latter any facility will need to be well designed and appropriately located.</p>	<p>Comments noted.</p> <p>Comments noted.</p>

Respondent	Comment	Proposed Amendment
Park Visitor (Local Resident) (continued)	<p>Would suggest the consideration of an interpretation panel about the Park's birds and waterfowl.</p> <p>It is felt the current catering arrangements are broadly acceptable with any new purpose built facility having a capital cost as well as extra running costs. It would also be an additional building in the Park.</p>	<p>Comments noted – An interpretation panel about the Park's wildlife is due to be installed on the lakeside of the Ocean Lake in 2012. The option of additional interpretational panels will be investigated in 2013/14.</p> <p>Comments noted.</p>
4. Medway Valley Countryside Partnership	<p>Overall the Plan is very comprehensive and covers a great deal of ground.</p> <p>Are there clear conservation objectives set by compartment in the habitat management plan?</p>	<p>Comments noted.</p> <p>Proposed Plan Amendment – Following further discussion it is proposed that a detailed Wildlife Management Plan be developed in the future and referenced in the overall Site Management Plan. Production of the Wildlife Plan will be undertaken in liaison with relevant external organisations including the Kent Wildlife Trust, Medway Valley Countryside Partnership and the Kent Ornithological Society</p>
5. Kent Wildlife Trust	<p>The Plan is too simplistic to direct the management of the site to maintain its wildlife value. It is appreciated that the Plan needs to encompass all management issues but would recommend a dedicated Wildlife Management Plan.</p>	<p>Proposed Plan Amendment – It is proposed that a detailed Wildlife Management Plan be developed in the future and referenced in the overall Site Management Plan (also see comments above).</p>

Respondent	Comment	Proposed Amendment
Kent Wildlife Trust (continued)	<p>A number of further detailed comments were made including the management of the Mill Stream, grassland and lakes, soil scarification, scrub clearance, identification of key species and wildlife monitoring.</p> <p>The site has no Kent Biodiversity Action Plan species, so would advise removing this reference.</p> <p>There is a reference to tree planting with regard to the National Grid, there should be no tree planting unless it is to do with reinstatement following contractor works.</p> <p>Cormorants should not be considered as a threat in the SWOT analysis.</p> <p>Suggest changing 'dominant and alien' to 'invasive non-native' in Table 12 (6d).</p> <p>If species control is dictated by law they do not need to be in the Management Plan</p> <p>The boundary of the Local Wildlife Site is incorrect (correct boundary map supplied)</p>	<p>Comments noted – It is proposed that these comments be addressed through the development of the detailed Wildlife Plan.</p> <p>Proposed Plan Amendment – Remove reference as suggested.</p> <p>Comments noted – This reference is in relation to ensuring trees are kept at the appropriate height to ensure they do not effect the operations of the power lines.</p> <p>Proposed Plan Amendment – Reference removed from the SWOT analysis.</p> <p>Proposed Plan Amendment – Amend as suggested.</p> <p>Comments noted – This reference only re-enforces our legal position as landowner.</p> <p>Proposed Plan Amendment – Amend as suggested.</p>
6. Kent Ornithological Society	Kent Ornithological Society is not a current key stakeholder, which is a surprise.	Proposed Plan Amendment – Kent Ornithological Society to be added as a Key Stakeholder and consulted of the future production of a specific Wildlife Plan.

Respondent	Comment	Proposed Amendment
Kent Ornithological Society (continued)	<p>The Plan states that bird surveys will be carried out every five years. We carry out monthly counts on the site. A number of Kent Ornithological Society members visit the site regularly and it is one of the most important inland sites in Kent for both quality and quantity of its birds. It is also one of the best sites in the country for Nightingales and a good site for Cetti's Warbler.</p> <p>A number of bird watchers are dismayed by the over rigorous clearance of scrub in the Park.</p>	<p>Comments noted.</p> <p>Comments noted – To be considered within the development of the Wildlife Plan.</p>
7. Park Visitor (Wildlife Interest)	Concerned from an ornithological standpoint of the three year rotational mowing schedule and the scrub clearance.	Comments noted – As highlighted above this will be considered within the development of the Wildlife Plan.
8. Park Visitor (Wildlife Interest)	<p>The Plan is not detailed enough with regard to key species such as Nightingale and Cetti's Warbler and concern is raised regarding the grassland and scrub management programme.</p> <p>Dogs should be kept on leads in all areas of the Park, as they run through the wildlife habitat. If not all year, at least between April and August, during nesting season.</p>	<p>Comments noted – As highlighted above this will be considered within the development of the Wildlife Plan.</p> <p>Comments noted – Dog Control Orders have been recently introduced at the Park following public consultation.</p>
9. Park Visitor (Wildlife Interest)	Concerned that wildlife and biodiversity is not appropriately managed to the benefit of key species on site. Proposes the development of dynamic plans for conserving and enhancing bio-diversity.	Proposed Plan Amendment – It is proposed that a detailed Wildlife Management Plan be developed in the future and referenced in the overall Site Management Plan (also see comments above).

Respondent	Comment	Proposed Amendment
10. Natural England	<p>Using the Green Flag criteria to provide a framework for the Plan gives a very good structure. Overall impression is that perhaps there should be more emphasis on sections 2-4 as at the moment the balance is weighted in favour of Part 1 – although it can be seen this sets the context for the other sections.</p> <p>Give more prominence to the main objective/Vision for the Park by putting it before the ‘role of the Management Plan’</p> <p>Will the Key Priorities change over lifetime of plan?</p> <p>Accessibility - Suggest reordering list with most sustainable methods first for example Access by Foot & Bicycle</p> <p>Page 18 – Chemical use is vetted and kept to a minimum. (<i>where possible</i> is not needed).</p> <p>Specifically link Park’s contribution to local Biodiversity Action Plan habitat and species?</p> <p>Page 25 – Volunteer Rangers – how about changing the last sentence to something like ‘<i>Our Volunteer Rangers are a valuable addition to the Ranger Team</i>’.</p>	<p>Comments noted.</p> <p>Proposed Plan Amendment – Amend as suggested.</p> <p>Comments noted – Annual action plans are developed and can then accommodate any significant amendments.</p> <p>Proposed Plan Amendment – Amend as suggested.</p> <p>Proposed Plan Amendment – Amend as suggested.</p> <p>Comments noted – To be considered within the development of the Wildlife Plan.</p> <p>Proposed Plan Amendment – Amend as suggested.</p>

Respondent	Comment	Proposed Amendment
<p>Natural England (continued)</p>	<p>Suggestions for slight rewording to strengthen objectives:</p> <p>1a. <i>To retain and enhance existing services including Rangers by securing and looking for opportunities to expand the budget for the Country Park (including applying for external funding as opportunities may arise).</i></p> <p>1b. <i>To continue to deliver a high quality park in order to achieve the annual Green Flag Award and high levels of visitor satisfaction.</i></p> <p>1c. <i>Continue to liaise with concessionaires to ensure they contribute to good visitor experiences.</i></p> <p>1d. <i>Declare the Leybourne Lakes Country Park as a Local Nature Reserve.</i></p> <p>2a. <i>Provide on-site information about the park, its facilities and activities at key entrance points.</i></p> <p>2b. <i>To provide equal access for all visitors, improving access where appropriate. This includes: Physical access, Access to information and Community inclusion.</i></p> <p>2e. <i>To enhance existing and provide new facilities as the budgets allow.</i></p> <p>3c. <i>To meet all legal obligations and adopt good health and safety practices thus maintaining the safety of users of the site.</i></p> <p>5b. <i>To minimise pesticide use</i></p>	<p>Comment noted – no proposed amendment.</p> <p>Proposed Plan Amendment – Amend as suggested.</p> <p>Proposed Plan Amendment – Amend as suggested.</p> <p>Comment noted – no proposed amendment.</p> <p>Proposed Plan Amendment – Amend as suggested.</p> <p>Comment noted – no proposed amendment.</p> <p>Comment noted. – no proposed amendment.</p> <p>Comment Noted. – no proposed amendment.</p> <p>Proposed Plan Amendment – Amend as suggested.</p>

Respondent	Comment	Proposed Amendment
Natural England (continued)	5d. <i>Encourage use of sustainable transport</i>	Proposed Plan Amendment – Amend as suggested.
	5e. <i>Ensure administrative practises are as sustainable as possible and ensure our suppliers are briefed on our sustainability policy.</i>	Comment noted – no proposed amendment.
	6a. <i>To retain and enhance a wide mosaic of different habitats in the Park and create additional habitat where possible.</i>	Proposed Plan Amendment – Amend as suggested.
	6b. <i>To ensure biodiversity is at the forefront of the Park’s management and integrated into any works schedule.</i>	Comment noted – no proposed amendment.
	6c. <i>Plant only native species of plants within the site.</i>	Comment noted – no proposed amendment.
	6d. <i>To control dominant and alien species such as Himalayan Balsam and species which we have duty to control under law like rabbits, rodents and ragwort.</i>	Proposed Plan Amendment – Amend as suggested.
	6e. <i>Create and carry out a programme for monitoring and recording wildlife and flora present in the Park.</i>	Proposed Plan Amendment – Amend as suggested.
	7c. <i>Carry out a feasibility study as a first step to developing an indoor educational facility.</i>	Comment noted – no proposed amendment.
	7d. <i>To continue to liaise with existing fishing, water sports and triathlon club users.</i>	Comment noted – no proposed amendment.
7e. <i>To provide opportunities for Healthy Living through walking and cycling programmes and other formal and informal activities.</i>	Comment noted – no proposed amendment.	

Respondent	Comment	Proposed Amendment
Natural England (continued)	Table 13 - Suggest grouping work areas to reflect earlier structure of Plan (group Projects in relation to the Objectives they meet).	Proposed Plan Amendment – Amend as suggested.
11. Scout Leader	<p>Table 9 – I believe Scout usage is much higher than five day events per year.</p> <p>On page 33 it is stated that no camping is allowed. You currently give an exemption to scout organisers to camp overnight to look after equipment – I assume this will continue.</p> <p>Leybourne Lakes Country Park is a very important water sports lake to scouts in Kent and in particular scouts in Tonbridge & Malling Borough. The Lakes’ location and size are perfect to safely teach and introduce young people to sailing and canoeing. We look forward to working with the Borough Council in the future to offer more activities to young people at the site.</p>	<p>Comments noted – This table is only indicative and offers approximate numbers.</p> <p>Comments noted – Exemptions to Park rules, such as No Camping, can be offered following the submission of the Events Form incorporating the correct health and safety and insurance documentation.</p> <p>Comments noted.</p>
12. Park Visitor (Local Resident)	<p>A very comprehensive draft of the five year plan and well laid out - congratulations.</p> <p>Residents with disabilities living in ground floor apartments overlooking the lake have problems with loss of light when trees at the water edge are not coppiced. Can the Council reduce the density of waterside hedging?</p>	<p>Comments noted.</p> <p>Comments noted – A programme of works for this section of vegetation has been approved by the Council and will include rotational coppicing (20% per year).</p>

Respondent	Comment	Proposed Amendment
<p>Park Visitor (Local Resident) (continued)</p>	<p>Cormorants and herons not shown in key species in table 6.</p> <p>Page 41 – The renewal of fishing swims should come from the concessionaire not the Council as suggested.</p> <p>Page 42 – Fishing club should incur 100% of the cost of surveying the lake and re-stocking fish population.</p> <p>A great Park, with superb facilities. Great care is needed not to overload facilities as we don't want to spoil a wonderful area.</p>	<p>Proposed Plan Amendment – Key species table to be updated to take into consideration comments from Kent Wildlife Trust.</p> <p>Proposed Plan Amendment – Funding for such facility improvements will always be undertaken in liaison with the concessionaire and funding may come from a number of sources – this will be reflected in the Plan.</p> <p>Proposed Plan Amendment – Plan amended as this is the current position.</p> <p>Comments noted.</p>
<p>13. Park Visitor (Local resident)</p>	<p>Concerned about increasing problems with dogs and although new Dog Control Orders are now in place, people ignore these rules and in areas these orders should be expanded, for example dogs on leads around the main Ocean Lake.</p>	<p>Comments noted – Dog Control Orders were recently introduced at the Park following public consultation. It is felt that at the current time they provide a balanced approach to dog control in the Park. Investigations will be made into appropriate enforcement of the Orders and it is hoped that, with time, visitors will adhere to these new rules introduced this summer.</p>

Respondent	Comment	Proposed Amendment
Park Visitor (Local resident) (continued)	With regard to the trees on the east bank of Ocean Lake, as the trees filled out and grew, people in the ground floor of the adjoining properties have found that it has blocked out light from their homes which affected their environment. It is suggested that regular thinning is undertaken and not coppicing.	Comments noted – This issue has been extensively investigated seeking comments from local residents, Councillors and visitors. A programme of work was subsequently approved and includes rotational coppicing (20% per year).
14. Park Visitor (Local resident)	Another local resident provided the same comments as above.	As above.
15. Park Visitor (Local resident)	The policy or guidance documentation listed in Table 1 should include specific reference to the approved planning concepts and objectives of the Country Park (TM/99/00032/FL). These planning documents were subject to extensive public consultations leading up to approval of the Leybourne Lakes housing development in 1999. They thus form part of the legal framework within which the Country Park operates. The wildlife and low intensity recreational uses that were set out in the planning documents are explicit in the present Management Plan Consultation Draft but other aspects, notably landscaping and visual relationships between the Country Park and surrounding housing areas, are not well covered. I believe that the original planning background, objectives and obligations are legally incumbent on the Council and should thus be made explicit within the Policy Context of the Management Plan.	Proposed Plan Amendment – Plan amended to reference Planning Decision in Table 1.

Respondent	Comment	Proposed Amendment
<p>Park Visitor (Local resident) (continued)</p>	<p>The Consultation Draft proposes improvements to built facilities. It is understood that a commuted sum in excess of £400,000 was provided by Berkeley Homes and was intended for this purpose. The capital value of this commuted sum is being steadily eroded by inflation and rising building costs so the present proposals are both welcome and timely; however, it appears that use of the commuted sum for capital improvements would result in loss of interest amounting to up to 20% of recurrent Country Park revenue (according to Appendix 9). The provision of such improvements to built facilities has already been the subject of general discussion within the Country Park User Panel, so the Management Plan should provide more specific information on how these proposals will now be taken forward. In particular: (a) on the current status of options under consideration, and likely consultations that will arise; and (b) how the capital expenditure and loss of revenue are expected to be reconciled, and the Country Park revenue stream maintained following expenditure of the commuted sum.</p> <p>The Table of contents lists Appendix 1 as a “Town/parish boundary map”, but the document presented under Appendix 1 is a “Location plan” that shows no reference to these boundaries. Also, the site boundary appears to exclude part of footpath MR84, and the area of “The Lakes” built development is incompletely shown.</p> <p>The diagram on page 32 shows a capital renewal fund of 15% (although it is not entirely clear which colour represents which expenditure), but there appears to be no corresponding reference in the list of expenditure given under Appendix 9.</p> <p>Page 40 refers to a “Master plan” as Appendix 3. Presumably this should be the “Master map” shown in Appendix 2.</p>	<p>Comments noted – The financial implications of any capital development at the site will always need to be taken into consideration and will include the impact on revenue budgets. In the absence of any detailed/costed proposals for facility improvements, at this stage, it is not possible to provide more detailed information within the proposed Management Plan.</p> <p>Proposed Plan Amendment – Plan amended as suggested.</p> <p>Proposed Plan Amendment – Diagram on page 32 amended to reflect budget highlighted at Appendix 9.</p> <p>Proposed Plan Amendment – Plan amended as suggested.</p>

Respondent	Comment	Proposed Amendment
<p>Park Visitor (Local resident) (continued)</p>	<p>Part 4. This important evaluation section seems rather skeletal and incomplete. Reference is made to evaluation against a series of Annual Management Plans but a draft of the first of these (presumably what is referred to in the Table of Contents as an “Annual Action Plan”) has not been made available for public consultation, so it is difficult to envisage how this process will take place in any detail. Assignment of section numbers in the Table of Contents seems rather unnecessary, given the paucity of text on page 47.</p> <p>Appendix 7 - is the John Deere Gator brochure really necessary or appropriate here? It seems little more than free advertising for John Deere! Surely it would be sufficient just to mention the main features of the equipment used.</p> <p>Appendix 8 - there are numerous errors in the Latin binomials. If Latin as well as common English names is to be given then the list should be accurate, and preferably complete.</p>	<p>Comments noted – Annual Action Plans will be drafted, and monitored, in accordance with the Five Year Action Plan and, therefore, until this has been approved, following public consultation, it cannot be developed.</p> <p>Proposed Plan Amendment – Plan amended as suggested.</p> <p>Proposed Plan Amendment – Plan amended as suggested.</p>
<p>16. Park Visitor (Local resident)</p>	<p>The policy context should also mention the conditions set out in the original planning permission for the development of the Country Park and the enabling housing development (TM/99/00032/FL), together with subsequent approved amendments relating to both the Park and built development.</p> <p>Section 13.0 refers to a Year One Annual Action Plan in Appendix 9. Appendix 9 contains the Budget breakdown but no action plan.</p>	<p>Proposed Plan Amendment – Plan amended to reference Planning Decision in Table 1.</p> <p>Proposed Plan Amendment – Plan amended to show Annual Action Plan 2012 as Appendix 10.</p>

Respondent	Comment	Proposed Amendment
<p>Park Visitor (Local resident) (continued)</p>	<p>Lakeside vegetation should also be maintained to comply with the description set out in the original planning consent for the Country Park. There are numerous mentions of the character of this vegetation in the application, such as “Waterside planting on existing embankment to assist filtering views of housing from country park”. This requirement should be mentioned in the appropriate section of the Five Year Work Programme.</p> <p>The map indicating the site boundary is not up to date. It does not detail the current extent of the built development of ‘The Lakes’ housing estate, and also indicates the boundary of the park being along the waterline of the Ocean Lake at the western edge of ‘The Lakes’ rather than to the East of the footpath where it runs alongside the lake at this location. The boundary appears to be correctly indicated on the map in appendix 5, although this also does not accurately depict the built development.</p> <p>The budget of £3,000 for electricity seems excessive for servicing the toilet and Ranger facilities. If this figure is accurate then I suggest investment in more eco friendly water and space heating facilities is considered, such as solar water heating and/or PV panels. The latter could also generate revenue under the Feed-in Tariff.</p>	<p>Proposed Plan Amendment – Plan amended to reference Planning Decision TM/99/00032/FL in Policy Context.</p> <p>Proposed Plan Amendment – Site boundary amended as suggested.</p> <p>Comments noted. – This electricity budget includes all security and CCTV operations. The electricity tariff for the Park is currently being changed, and it is anticipated that this will reduce costs.</p>
<p>17. Environment Agency</p>	<p>Supportive of the proposed Plan.</p>	<p>Comments noted.</p>