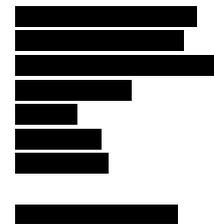


Date: 04 May 2020
Our ref: 311314
Your ref: -



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



By email only, no hard copy to follow

Dear Sir or Madam

Planning for growth on the Hoo Peninsula

Thank you for your email of the 6 March 2020 seeking Natural England’s advice on the ‘Planning for growth on the Hoo Peninsula’ consultation document. Natural England welcomes the opportunity to engage with this consultation as part of our shared vision to realise a sound Local Plan for Medway.

Natural England in general welcomes the information within the Planning for growth on the Hoo Peninsula report, acknowledging that it is at present limited in detail being a strategic document. We would support more detail coming forward through the Local Plan process building on the work being undertaken as part of the cumulative ecological impact assessment for the development options on and around the Hoo Peninsula and the wider Isle of Grain.

The Local Plan and supporting cumulative ecological impact assessment should guide the growth and associated infrastructure allocations to ensure that the ‘avoid, mitigate, compensate’ hierarchy in the National Planning Policy Framework (NPPF) is followed, thoroughly considering alternatives with no or a lesser impact. We recommend that the Local Plan should allocate growth options which avoid impacts to the natural environment in preference to those requiring mitigation or compensation measures to be implemented. In addition to avoiding impacts, the options for growth should reflect the requirements of the NPPF and the emerging Environment Bill to achieve a net gain for biodiversity.

Vision

In terms of the vision for Hoo St Werburgh, we would support a much greater emphasis being placed on the rich natural environment in which the Hoo Peninsula lies. If the vision of truly sustainable communities is to be realised, the natural environment should be at the heart of the vision and the development proposals should include significant corridors of high quality, semi-natural greenspace embedded throughout the new communities for people and wildlife. The vision at present suggests that by 2037 Hoo St Werburgh will be a thriving rural town ‘surrounded’ by well maintained and accessible habitats – as part of Medway’s green infrastructure strategy these natural areas should be extended to form a network linking through the developments reconnecting the landscape for people and wildlife to thrive.

Opportunities and constraints

Whilst it is noted that the Constraints Plan on Page 6 of the document is schematic, the boundary of the Medway Estuary and Marshes Site of Special Scientific Interest (SSSI) does not reflect that, in general it follows the mean high water mark, in this area. The SSSIs on the Peninsula are a significant conservation resource supporting a wealth of species in addition to the habitats and species for which they are notified. Rather than being considered a constraint, they are a significant asset and opportunity for Medway to undertake truly landscape scale conservation, if the proposed

allocations at Hoo St Werburgh proceed. Opportunities for connecting woodland/scrub habitat for breeding birds, providing habitat corridors for the many species of bats and invertebrates on the Peninsula and creating wetland habitat are all opportunities the designated sites offer to feed into a landscape scale conservation strategy. These in turn, if sensitively designed will provide significant health and wellbeing for residents whilst also helping to alleviate the recreational pressure to the designated sites.

Similarly, whilst we acknowledge that the Opportunities plan on Page 7 is schematic, significant areas of development appear proposed in close proximity to designated sites, including Chattenden Woods and Lodge Hill, Medway Estuary and Marshes, Tower Hill to Cockham Wood and Northward Hill Sites of Special Scientific Interest (SSSIs). Opportunities to buffer the designated sites through the provision of areas of natural greenspace for managed recreation, for example through the creation of country parks, may help to mitigate impacts to the SSSIs whilst also providing opportunities for access, recreation and wildlife.

Design Principles

Principle 1: A landscape led development

Natural England supports the landscape led approach which should ensure that, through the evidence base and cumulative ecological impact assessment associated with the Local Plan, developments (and their associated infrastructure) which avoid impacts to the ecological assets are those which progress to allocation.

Similarly, whilst Natural England is supportive of people having access to the natural environment, this can result in impacts and will need to be carefully managed through the provision of avoidance and mitigation measures as part of the Strategic Environmental Management Scheme (SEMS). We will of course be pleased to work with the Council on the measures to be included within the SEMS to realise the ambition for a sustainable Plan.

Whilst the Green Corridor plan on Page 7 is understandably strategic in nature at present, in addition to the large scale green corridors, high quality green infrastructure should be fully integrated throughout the Hoo Peninsula development proposals providing green linkages through the residential areas. Again, we would be pleased to work with the Council on these measures in the near future.

Principle 2: Access and movement

Natural England is generally supportive of enhanced cycling and walking routes as part of a sustainable development strategy. Any transport infrastructure associated with site allocations that proceed at Hoo should ensure that direct and indirect impacts to designated sites do not result from any road, cycle or footpath provision.

Principle 3: Vibrant and sustainable neighbourhoods

Natural England has no specific comments to make in relation to Principle 3 other than those made elsewhere in relation to avoiding impacts to designated sites and the provision of green infrastructure throughout the neighbourhoods linking to the wider landscape.

Principle 4: An attractive and tailored built form

Natural England welcomes the commitment to sustainable design in the built environment and would also suggest that this includes measures to reduce water consumption to minimise impacts to wetland designated sites. The built environment also has significant opportunities to incorporate features for wildlife through the provision of green and brown roofs and the provision of nesting and roosting opportunities for birds and bats, for example. Innovative design and the use of nature based solutions can also help mitigate the impacts of climate change in urban areas which should be fully explored through the Local Plan process.

Neighbourhood Characters

Village living in Chattenden

The indicative neighbourhood character for Chattenden shows new transport routes and development areas which appear to lie within/in very close proximity to the boundary of the

Chattenden Woods and Lodge Hill SSSI. Natural England would expect any development in this area to demonstrate that all direct impacts are avoided and indirect impacts are avoided or fully mitigated. Such indirect impacts are likely to result from cat predation, noise, lighting, increased recreational pressure and general urbanising effects, for example. If the site is to proceed to allocation, a significant buffer to the SSSI is likely to be required and any allocations should be guided by the results of the cumulative ecological impact assessment.

Parkland living in Deangate

Given the proximity of the site at Deangate to the Chattenden Woods and Lodge Hill SSSI, Natural England would expect any development around in this area to demonstrate that all direct impacts are avoided and any indirect impacts are avoided or fully mitigated. Such indirect impacts are likely to result from cat predation, noise, lighting, increased recreational pressure and general urbanising effects, for example. If the site is to proceed to allocation, a significant buffer to the SSSI is likely to be required and any allocations should be guided by the results of the cumulative ecological impact assessment.

Rural town living in Hoo St Werburgh

Natural England recommend that even in the higher density urban areas, including those proposed at Hoo St Werburgh, green infrastructure and nature based solutions to mitigate the effects of climate change should be an integral component of urban design.

Riverside living in Cockham Farm

Given the proximity of this area to the Medway Estuary and Marshes SSSI, Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site) along with Tower Hill to Cockham Wood SSSI bespoke measures to manage recreational disturbance will be required. The provision of a country park, if sensitively designed, could be a key component of this but we note that the indicative plan on Page 16 shows proposed access connections to the coast. We recommend that measures to provide residents with a high quality, semi-natural greenspace without direct linkages to the coast should be a key component of the package of mitigation measures proposed. We will of course be pleased to work with the Council on the detailed measures required.

Contemporary living by the new rail station

As with the Hoo Rural Town, Natural England recommend that even in the proposed higher density urban areas, green infrastructure and nature based solutions to mitigate the effects of climate change should be an integral component of the urban design.

Village living in High Halstow

Given the proximity of the site to Northward Hill SSSI, any proposed allocation will need to ensure that impacts do not result. Significant green infrastructure and landscape scale habitat connectivity for a number of species groups exist around High Halstow linking back to Chattenden and the wider Hoo Peninsula and it would appear appropriate for these to be more fully reflected throughout the document.

A thriving employment hub in Kingsnorth

Kingsnorth is situated in a rich environmental setting being surrounded by the Medway Estuary and Marshes SSSI, SPA and Ramsar Site along with the Medway Estuary Marine Conservation Zone. Any allocation proposals should ensure that direct impacts are avoided with any indirect impacts being avoided or fully mitigated whilst also seeking opportunities to further the conservation of these sites. Sustainable design should also be encouraged, for example through the incorporation of brown roofs to support invertebrate assemblages for which this part of Kent is important.

I hope these comment are helpful, we would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me on 0208 0266 064 or by email to sean.hanna@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please email consultations@naturalengland.org.uk.

Yours faithfully



Sean Hanna
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Sussex and Kent Team