

Date: 11th May 2020

To: futuremedway@medway.gov.uk (by email only)



Dear Madam/Sir,

RE: Planning for growth on the Hoo Peninsula consultation

This letter is written in response to the consultation on the *Planning for Growth on the Hoo Peninsula* document. Firstly, given the high level nature of this document and lack of specific detail it has not been possible to undertake a proper assessment of the strategy for development on the Hoo Peninsula. Below are Kent Wildlife Trusts concerns and our broad comments for your consideration as the scheme progresses.

Vision

The proposed vision makes no reference to biodiversity, nature, green space or the environment. The Hoo Peninsular is of high value for biodiversity, demonstrated by the international, national and local designations and presence of protected and notable species. Consequently, biodiversity should be a priority at every stage of development planning on the Hoo Peninsular, to ensure that all these sensitive receptors are protected and enhanced. Further, any vision for development should align with the Government's commitments, as set out in the 25 Year Environment Plan, to deliver biodiversity net gains and to create nature recover networks. Both of these commitments will be legislated by the upcoming Environment Bill and strategic planning at these early stages will be essential for delivering the best outcomes for biodiversity. At present, both the vision and the plan for growth on the Hoo Peninsula are predominantly people focused and not biodiversity focused. We would suggest that this be incorporated into the vision through the following amendment; "*By 2037, Hoo St Werburgh will be a thriving rural town, **designed to support the environment and biodiversity and be sensitively integrated into the extraordinary landscape of the Hoo Peninsula.*** [...]".

Ecological Impact Assessment

An in-depth, strategic review of potential environmental impacts of development on the Hoo Peninsular should be undertaken. Without details of likely impacts, it is not possible to assess Medway's vision for growth. An Ecological Impact Assessment (EcIA) should be undertaken. EcIA should follow the CIEEM guidance 'Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine Version 1.1'. We particularly wish to draw your attention to p.13, which sets out what should be covered by the impact assessment, including the identification of cumulative impacts and significant effects without any mitigation. Where significant impacts alone or in combination are identified then the mitigation hierarchy should be applied. We wish to stress that the impact assessment should inform further evolution of project design. The impact assessment and application of the mitigation hierarchy should not be retrofitted to the existing development strategy.

The EcIA should include impacts to all statutory and non-statutory designated sites and priority species and habitats. We wish to draw your attention to the close proximity of Grain Pitt Local Wildlife Site. This reedbed supports more than three Kent Red Data Book 3 bird species. Grain Pit is a brownfield site which falls into the priority habitat of 'open mosaic habitats on previously developed land'. Consideration should be given to this Local Wildlife Site to avoid both direct and indirect impacts from increased population in the surrounding area.

Nationally and Internationally designated sites



Paragraph 171 of the National Planning Policy Framework states that: “*Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.*”

Medway Estuary and Marshes Special Protection Area (SPA), Ramsar site and Site of Special Scientific Interest (SSSI)

Due to the lack of detail within the plans, it is not possible to assess all of the potential impacts of the proposals on the qualifying features of the Medway Estuary and Marshes SPA, Ramsar and SSSI. One likely impact will be recreational disturbance. Mitigation should be provided through the Strategic Access Management and Monitoring Plan (SAMM). In addition, high quality, multifunctional green space should be provided to further mitigate against disturbance by encouraging residents to use alternative sites. Recreational pressure and other potential impacts to the SPA and Ramsar should be assessed through a Habitats Regulations Assessment.

Chattenden Woods and Lodge Hill SSSI

We are particularly concerned about the impacts of the Chattenden Development on Chattenden Woods and Lodge Hill SSSI. Due to the high level nature of the consultation document, and the inaccuracies in the mapping of the SSSI and the development (including new roads) it is not possible to provide detailed comments. Please accept our overarching comments of key considerations relating to impacts to Lodge Hill SSSI.

- *Public access*: We are greatly concerned about increased recreational pressure on the SSSI and its sensitive features, including nightingale.
- *Cats*: Residential housing in this location poses increased risk of cat predation within the SSSI. This is particularly a concern for nightingale, which is a designated feature.
- *Lighting*: Noise and light disturbance are likely to result from both residential housing and from new access roads. Proposed development should be designed to avoid light spill into the SSSI. This could be achieved through the use of buffer zones, sensitive lighting schemes and development design with the SSSI in mind.
- *Mitigation and compensation*: As stated above, due to the high level nature of this document it is not possible to determine proposed mitigation and compensation measures.

Tower Hill to Cockham Woods SSSI

It is noted that this SSSI is inaccurately labelled within the consultation document. It appears to have been referred to as ‘Beacon Hill Wood SSSI’ and ‘Cockham Wood SSSI’. We advise that designated sites be accurately mapped and labelled.

The condition assessment undertaken by Natural England in 2009 indicated that one of the four SSSI units was in unfavourable – declining condition. The assessment stated that “*There are problems with recreational activities causing erosion and destruction of the ground flora in this unit. Lots of tracks and slipways possibly caused by trail bikes were noted, which has created a lot of bare ground. This recreational damage is mainly on the land between the footpath to the West and the area in the East of this unit. Several bonfire sites were also noted, surrounded by bare ground.*” Development on the Hoo Peninsular, and in particular the ‘Riverside Living in Cockham Farm’ must support the recovery of the SSSI and its interest features. The proposed country park should not promote or encourage access to Cockham Woods SSSI and should serve as a suitable and attractive alternative green space. It may be useful to consider guidance for Suitable Alternative Natural Green Space (SANGS) when designing the country park although it is acknowledged that mitigation for impacts to a SSSI do not require SANGS.

The Hoo Peninsular is arguably the most sensitive location for housing development with regards to biodiversity in Medway. Therefore, there should be a proportionate focus on biodiversity when preparing a green infrastructure plan and the overarching masterplan. Trade-offs between the need for public access and the need to protect and enhance biodiversity must be considered, with alternative provision of recreational space provided where necessary. The green corridors depicted on page 9 do not provide sufficient detail to determine if the green space provision is appropriate or sufficient to meet the requirements of the National Planning Policy Framework, paragraph 174 which states that plans should: “(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and (b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” Green space provision within developed areas should also be highlighted within the plans to prevent ‘concrete jungles’ devoid of nature and to provide climate change mitigation and wellbeing benefits. To achieve maximum benefits for people and wildlife green infrastructure should be designed to be multifunctional, where appropriate.

We refer you to our previous comments provided in response to Medway’s Green and Blue Infrastructure Vision consultation, dated 27th September 2019. Kent Wildlife Trust would be happy to engage with you further on detailed design and implementation of a green infrastructure strategy. We would also welcome the creation of a ‘green spaces working group’ to allow nature conservation organisations to input and advise on design and creation.

Net gain

The Government set out its commitment to achieve Biodiversity Net Gain within its 25 Year Environment Plan, which will be mandated within the upcoming Environment Bill. The Environment Bill requires all future schemes to deliver a mandatory 10% biodiversity net gain. We would advise that the provision of net gain is considered at the early stages, with particular consideration to the provision of onsite net gain delivery. We would advise that a strategy for the delivery of Biodiversity Net Gain is prepared to guide developers on the most suitable locations. This coordinated approach would allow for heightened opportunities for biodiversity in this sensitive location and contribute to creating connectivity through the landscape. We would advise that this strategy for net gain be mapped to provide clarity for consultees and stakeholders. Kent Wildlife Trust would be happy to engage with you further in order to incorporate this into your plans.

I hope that the above proves useful in informing scheme design. Please do not hesitate to contact me for clarification on any of the points raised within this letter.

Yours sincerely,

Nicky Britton-Williams
Wilder Towns Officer
Kent Wildlife Trust

