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To Whom it May Concern

## **Future Hoo - New Routes to Good Growth**

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The RSPB welcomes the opportunity to comment on the New Routes to Good Growth proposal.

As the consultation questionnaire is largely aimed at local residents, we have decided that a written response would be more suitable in order to share our comments and concerns. We hope that these comments are helpful.

### **Overarching comments**

The RSPB maintains serious concerns regarding the ability to deliver large numbers of new housing on the Hoo Peninsula, a highly sensitive area, while protecting its important wildlife assets. Robust assessment of the sustainability of the proposed housing growth options for this area is still necessary through the Medway Local Plan. However, the delivery of strategic environmental management measures, alongside other infrastructure, will be absolutely critical to delivering sustainable growth. We therefore welcome the principle of the HIF infrastructure, subject to the need for further assessment of the proposed levels of housing growth.

We set out below our comments on the HIF proposals, as described in the consultation document.

### **Highways**

The HIF proposals include a number of upgrades to the road network on the Hoo Peninsula, the most significant of which is a new relief road via Woodgate Way, which skirts part of the boundary of the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI).

The nationally important population of breeding nightingales supported by the SSSI is highly vulnerable to the indirect effects of urbanisation. Although we note that the consultation assures that the works will be within the

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existing carriageway in the case of the existing stretch of road, and in all other sections the works will be outside of any designated boundaries (P29), there is still the potential for a number of indirect impacts to arise from the construction and long-term operation of the relief road which will need careful assessment and potential mitigation.

These potential impacts include (*inter alia*):

- Noise and visual disturbance from machinery, earthworks etc during construction.
- Noise, visual and light disturbance, in addition to potential pollution from traffic during operation of the relief road.
- Increased noise and visual disturbance associated with the proposed upgrade the footpath and cycle facility within the SSSI alongside Woodfield Way.
- Artificial light disturbance as a result of the plans for new street lighting at the northern end of Woodfield Way, where the road connects to the existing Upchat Roundabout.

In addition, despite the assurances that there will be no direct impacts from the relief road on designated sites, we note under the 'Ecological and environmental mitigation' section (P30), the consultation does in fact refer to direct as well as indirect impacts to habitat within the SSSI from Phase 2 of the relief road. It is unclear what these direct impacts are and why they have not been avoided in line with the National Planning Policy Framework (NPPF) (Para 175(a) & (b)). We would be grateful for clarification on this matter.

## **Rail**

We do not wish to make any substantive comments on the rail proposals set out within the HIF consultation. The RSPB is broadly supportive of the proposals to upgrade the rail infrastructure in order to offer more sustainable forms of transport for both new and existing residents of the Hoo Peninsula. Nevertheless, we note that some of the proposals outlined in the consultation could result in localised impacts to statutory sites, including the Thames Estuary and Marshes Special Protection Area, which will require careful assessment and, where necessary, measures put in place to ensure that the designated sites are protected from adverse effects.

For clarity, it would be helpful to see these potential impacts and any mitigation clearly identified, similar to that of the Highways impacts set out on pages 29-30. It is unclear why a different approach has been taken to the Rail impacts.

## **SEMS**

The RSPB is supportive of the Strategic Environmental Management Scheme (SEMS), and consider it is essential to addressing the significant pressures that the proposed housing and associated HIF road and rail infrastructure will place on the Peninsula's important wildlife. The HIF funding creates a unique opportunity to deliver truly impactful outcomes for nature, including ambitious and innovative solutions to the pressures arising from the proposed development, as well as long term positive enhancements.

We understand the SEMS is in the early stages of design and as a result there is limited detail presented in the consultation document. It is therefore difficult at this stage to comment on its robustness or appropriateness in protecting and enhancing the significant ecological assets of the Hoo Peninsula. However, based on the limited information presented, we do have some concerns about the scope of the SEMS proposals.

In particular, we are concerned that the proposals do not appear to make any reference to the role of SEMS in addressing ecological impacts from the increase in housing (only impacts from the other elements of infrastructure which are all relatively localised), or any ambitions to create significant areas for wildlife. This is disappointing and does not reflect our understanding of Medway's ambition for the SEMS.

Based on the information presented in the consultation, the principle objectives of the vision for the SEMS would appear to be the delivery of publicly accessible greenspaces, in particular the Cockham Community Parkland. Such areas of accessible greenspace will have an important role in providing the opportunity for people to connect with the countryside without impacting on sensitive areas for wildlife. However, while these accessible greenspaces will undoubtedly have some value to local wildlife, their ecological value will inevitably be compromised by the levels of disturbance and by limitations on the ability to manage the land to optimise wildlife interests. Therefore we would urge the Council to avoid any attempts to deliver additional ecological

objectives within these areas, as attempting to do so is likely to result in conflict with their primary purpose and also reduce the value of any wildlife habitat created, potentially even acting as an ecological “sink” for some species that attempt to breed there.

In terms of addressing the ecological impacts from the proposed new housing, there is brief reference in the consultation to nightingales and breeding wader habitat but there is no clarity provided around what area of habitat may be specifically required to compensation for impacts to existing populations, including those within statutory protected sites such as Chattenden Woods and Lodge Hill SSSI which will be subject to intense pressure from proposed new housing. Nightingales are a key feature of the Hoo Peninsular and as highlighted previously are susceptible to impacts from urbanisation. Breeding waders are also an important feature of the Peninsula, particularly within the network of protected sites to the north of the Peninsula, including Higham Marshes, Cliffe Pools and Northwood Hill. One of the greatest threats to breeding waders using these areas is disturbance from recreational use, the increase of which is likely to be significant with the proposed housing growth. This issue will need careful assessment and mitigation/compensation secured as appropriate in order to ensure that these important populations can continue to survive on the Peninsula.

**It is important that, where adverse effects to SSSI populations cannot be avoided or mitigated, compensatory measures are secured in line with the NPPF (Para 175 (a) and (b)). This process must be followed through step-by-step, with clear demonstration that no less harmful options exist before damaging development can proceed. Where such damage can be fully justified (i.e. it can be shown that there are no less damaging sites for the development (NPPF, Para 175a) and that *‘the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest’* (NPPF, Para 175b)), the resulting requirements for compensatory habitat must be made distinct from wider Biodiversity Net Gain and other habitat being delivered as part of the SEMS.**

We look forward to seeing the Council’s plans develop for the SEMS, in particular we look forward to seeing plans for the delivery of robust and ambitious proposals for protecting, enhancing and re-connecting significant areas for wildlife across the Hoo Peninsula in order to secure a long-term and meaningful legacy of the HIF.

Yours sincerely



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