

Date: 26 February 2021  
Our ref: 339785  
Your ref: -



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**By email only, no hard copy to follow**  
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Dear Sir or Madam

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

Thank you for your email dated 14 January 2021 seeking Natural England's comments on the 'Future Hoo – New Routes to Good Growth' document.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the opportunity to provide advice on the proposals at this early stage and we will of course be pleased to provide further guidance as the projects progress. For ease, I have provided our comments by topic, based upon the road, rail and environmental infrastructure elements.

#### **Road infrastructure improvements**

The proposed road improvements have the potential to result in direct and indirect impacts to the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI). Natural England has previously provided advice that the route of the road should be selected to avoid impacts to habitats and species associated with the SSSI. We would therefore recommend that the route and detailed design avoids any direct habitat loss from the site. Similarly, indirect impacts from lighting, noise, air quality and recreational disturbance (for example) during both the construction and operational phases should also be avoided or fully mitigated as part of the scheme design. We will of course be pleased to work with the Council on these details as the scheme progresses.

In addition to the potential for impacts to Chattenden Woods and Lodge Hill SSSI, impacts to other SSSIs may result from changes in traffic generated air quality and we would recommend that these are fully considered within detailed design and any subsequent planning application.

#### **Rail proposals**

Natural England welcomes the removal of the Higham Curve from the rail improvements as this had the potential to result in significant loss of habitat from the South Thames Estuary and Marshes SSSI and the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site.

The diversion of access routes and public rights of way along with the associated infrastructure combined with the provision of a second line has the potential to result in direct impacts to these designated sites. Indirect impacts from noise, visual disturbance, lighting, air and water quality (for example) may also result from the proposals during the construction and operational phases. We

therefore recommend that the scheme should be designed to avoid, or fully mitigate any impacts to habitats and species associated with the designated sites.

There is also the potential for impacts to birds associated with the SPA and Ramsar site using land outside of the designated sites to be impacted by the rail proposals. Natural England therefore recommends that any potential impacts to such functionally linked are also considered fully through the design and planning application process.

### **Strategic Environmental Management Scheme**

Natural England supports the broad scope of the Strategic Environmental Management Scheme (SEMS) and welcomes the commitment to provide multiple benefits for people and the environment. A key element of the SEMS will be to ensure that they mitigate any environmental impacts but also provide opportunities for people to connect with nature on their doorstep, with the health and wellbeing benefits this brings, along with conserving and enhancing the rich biodiversity of the area. It will be important to ensure linkage of the SEMS with the emerging green and blue infrastructure strategy and net gain requirements to ensure a coherent network.

Should the local plan allocate residential development in these areas, the SEMS should be designed in a way which ensure that corridors of high quality, semi-natural greenspace can be incorporated to link any development areas through to the SEMS to provide corridors for wildlife and people as part of a sustainable community.

I trust these comments are helpful. The advice in this letter is provided in relation to the Future Hoo consultation document rather than the potential development allocations that the infrastructure will support. We will of course be pleased to continue to working with the Council on these and wider matters through the local plan process with our shared vision of securing a sound local plan.

For clarity on any of the points in this letter please do not hesitate to contact me by email to [sean.hanna@naturalengland.org.uk](mailto:sean.hanna@naturalengland.org.uk) or by telephone on 0208 0266 064.

Yours faithfully

Sean Hanna

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