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Planning for Growth on the Hoo Peninsula Response Form

This response form has two parts to complete below.

Data Protection

Personal information gathered on this form will only be used for planning policy purposes and will be held in accordance with the requirements of the Data Protection Act 2018. Your contact details will be **kept confidential** but your comments will form part of the public record of the consultation and published on the council's website. Please address any questions or requests regarding our data processing practices to planning.policy@medway.gov.uk.

Details about how your information will be held and used are found on the link below:
https://www.medway.gov.uk/info/200133/planning/714/planning_service_privacy_statement

Part 1 – Your Details

Name: Chloe Rose

Name of organisation (if applicable): RSPB

Address:

[REDACTED]

Email:

[REDACTED]

Phone:

[REDACTED]

Ref:

Part 2 – Your Response

- This public consultation proposes a vision for growth on the Hoo Peninsula.
- The vision should help to make it clear what we want to achieve. It should be clear, realistic and locally distinctive.
- The vision is important because it will guide the objectives, policies and design principles.

The proposed vision is:

By 2037, Hoo St Werburgh will be a thriving rural town, sensitively integrated into the extraordinary landscape of the Hoo Peninsula. A valued place providing homes, jobs and services for vibrant communities. A small town with an attractive choice of travel connections. A place built for the future, and respecting the past.

1. Do you get a clear sense of what the Hoo Peninsula will be like by 2037?

No

While we get a sense of what the Hoo St Werburgh will be like in 2037 as a rural town, it doesn't provide a clear sense of what the Hoo Peninsula as a landscape will be like by 2037. While Principle 1 describes a landscape-led development including - "improving the existing natural environment for people as well as the local wildlife", this lacks any detail around the Hoo's natural assets and what the Peninsula may look like in the future. Climate change for one will play a key role in shaping the future character of the Hoo Peninsula, with increasing sea levels and reduced freshwater.

2. Does the vision describe the Hoo Peninsula as opposed to anywhere?

No

The vision doesn't characterise what makes the Hoo Peninsula landscape (and ecology) "extraordinary". Briefly describing the special character of the Peninsula – e.g. woods, freshwater wetlands, estuaries and coast rich in wildlife – in the vision would improve its reflection of the area.

3. Does the vision reflect your priorities?

No

We would like to see better recognition within the vision (and the wider consultation document) of the rich wildlife of the area and the vulnerability of that wildlife to the urban effects of housing growth. We appreciate that "sensitively integrated into the extraordinary landscape of the Hoo Peninsula" hints at this, but it needs to be more explicit. We suggest that the vision would be improved by adding the words "and protecting and enhancing its special wildlife" to better recognise this important issue.

There is also a huge opportunity to connect with people on the Peninsula who will be living amongst exceptionally rich and highly sensitive wildlife. We would like to see something in the vision about how the people living and working around the Hoo Peninsula will recognise it as a world-class wildlife site and feel strongly that it should be protected and enhanced, increasing their well-being and increasing their connection to the natural world.

4. Is it concise and easy to understand?

Yes

5. How can we measure success of achieving the vision?

Comments:

The cumulative Ecological Impact Assessment (cEIA) that is currently underway should establish an effective and robust baseline that measurable targets for species and habitats can be set against in order to measure future success in respect of ecological protection.

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6. Can you set out a better vision for growth on the Hoo Peninsula? Please tell us:

Comments

Whilst the vision is clear, forward-looking and time-bound, we would like to see the following reflected in it:

- Better recognition of the special character of the Peninsula's biodiversity and a clearer vision as to what the Hoo Peninsula will look like as a landscape by 2037
- A clear commitment to protecting and enhancing the Hoo Peninsula's vulnerable wildlife (see our suggested additional text under Question 3 above).
- Greater reflection of the need to connect Hoo's local communities and visitors to its exceptional wildlife.

7. Please use the space below to make any other comments on the consultation document:

As explained above, we are concerned that the consultation document doesn't adequately reflect the exceptionally rich and highly sensitive wildlife of the Hoo Peninsula, and the challenge of delivering sustainable development that protects and enhances this significant asset.

Indeed, there are a number of statements in the document that we consider could directly conflict with the Council's duties concerning protected wildlife sites in the area. For example, under Principle 1, a key aspiration includes "*providing better public access to the natural assets throughout Hoo*". We welcome and support the Council's commitment to a wildlife-rich network of open spaces both for residents (existing and new) and visitors and the opportunities to create new wetlands closer to the River Medway; the RSPB is fully supportive of people accessing nature sensitively and responsibly. However, accessibility must not come at the cost of increased recreational pressure causing impacts to protected sites. The substantial number of new houses proposed for the area risks putting Hoo's statutory protected wildlife site network under damaging levels of recreational (and other urban) pressure, and a number of these sites will require careful protection from such impacts.

The RSPB is particularly concerned by the level of proposed new housing, set out in the consultation document, within close proximity to the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI), the UK's most important site for nightingales. This site and its nationally important population of breeding nightingales is extremely vulnerable to the indirect effects of urbanisation, including recreational pressures, cat predation, noise and artificial lighting. These impacts must be carefully assessed before potentially undeliverable allocations for new housing are put forward within close proximity (i.e. within at least 400m) of the SSSI, where impacts such as cat predation will be difficult, if not impossible, to mitigate. We would remind the Council that Paragraph 175(b) of the National Planning Policy Framework (NPPF) states that: "*development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.*" Protected sites like Chattenden Woods and Lodge Hill should not, however, simply be viewed as constraints (Opportunities and Constraints, page 6). SSSIs like this are the jewels of UK natural heritage and should be recognised as places to be protected, effectively buffered and enhanced.

Protecting and enhancing Hoo's natural assets, while providing new habitats and new areas of accessible greenspace to reduce recreational pressures on their sensitive wildlife should be a central theme to the final development framework if the desired level of new development on the Peninsula is to be truly sustainable. The development framework must therefore be clear that the proposed growth must be more than just "*sensitive to the environment*" (Local Plan context, page 4). In line with national planning policy, the new growth should both protect and enhance the natural environment, in particular the protected sites network. The protection of Chattenden Woods and Lodge Hill SSSI (alongside that of other protected wildlife sites in the area) will be a key test of the Council's success in delivering truly sustainable development on the Hoo Peninsula.

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The RSPB is grateful for the opportunity to engage with the Cumulative Ecological Impact Assessment (CEIA) that the Council has commissioned to fully assess the effects of the proposed housing growth on the Hoo Peninsula. It is essential that the findings of the CEIA inform the next stages of the Medway Local Plan and Hoo Peninsula development framework in order to avoid and mitigate the impacts of the new development on protected sites and other wildlife assets in the area.