

Date: 24 November 2022
Our ref: 407620
Your ref: -



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Dear Sir or Madam

Hoo Development Framework Consultation

Thank you for your consultation on the above dated 23 September 2022 which was received by Natural England on the same day.

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.

Unfortunately due to resource constraints we have not been able to provide as full a response as we would have liked but have focussed our advice below on aspects of the natural environment most pertinent to our advisor role.

Natural England welcomes the landscape led approach to the Framework and the proposals for significant areas of green infrastructure through the community parklands and the wildlife and wellbeing benefits these will bring. As mentioned previously given the rich environmental heritage of the area, significant corridors of semi-natural greenspace should be provided through the built development to link the landscape for species and people; a grid of green infrastructure providing north-south, east west links through the development providing easy access for residents will be key to the success of the green infrastructure network for people and wildlife.

We note from the Key Green Infrastructure section on Page 3 that the previous recommendations in relation to the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI) have been amended as follows:

'The potential development of residential sites north of the Peninsula Way, which are in close proximity to the nationally important Lodge Hill Site of Special Scientific Interest (SSSI), need to be planned in consideration of their impact on key species such as nightingales and bats. Therefore, factors such as cat predation, noise, light and air quality all need to be understood to manage impacts with the creation of buffers to the protected habitats and species of the SSSI and other measures such as the provision and management of cat proof fencing and the creation of ditches as wet fences or swales.'

In order to ensure that impacts to the SSSI from urbanising effects, including cat predation, do not result we consider that the design, layout nature and quantum of development that can be delivered should be tested iteratively with the emerging evidence from the Cumulative Ecological Impact Assessment (CEcIA). Natural England remains supportive of the CEcIA approach and we will be pleased to provide further advice once this can be shared. The CEcIA should guide the Framework

along with making recommendations on a strategic avoidance and mitigation strategy to ensure impacts to the SSSI do not result.

Natural England notes that the Primary Green Routes detailed on Figure 3.5 Principle 1 – Landscape-led development show routes passing through the Chattenden Woods and Lodge Hill SSSI. It would be helpful for further clarity to be provided on what the potential impacts are from these along with how they will be avoided or fully mitigated before the Framework progresses. Natural England will be pleased to provide further advice on these.

Similarly, Figure 5.9 Chattenden open spaces and connectivity appears to propose new greenways and footpaths through the Chattenden Woods and Lodge Hill SSSI. We would recommend that further clarity is provided on these proposed measures along with details of how any impacts to the designated site will be avoided or fully mitigated as part of the Framework.

I hope these comments are helpful and 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 Sean Hanna 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 send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Sean Hanna
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Sussex and Kent Team