

Our ref: Princesparade121017
Your ref: Princes parade

12/10/2017

Shepway District Council



Dear Sir/Madam

Y17/1042/SH Princes Parade Promenade Princes Parade Hythe Kent

Thank you for inviting Kent Wildlife Trust to respond to your consultation for a hybrid planning application at Princes Parade. As this site has a long planning history, Kent Wildlife Trust has responded on several occasions to various consultations, including on planning policy for the site and more recently on the EIA scoping opinion. In our last letter (17th August 2016), my colleague Keith Nicholson highlighted our chief concern that any future development should:

- respect those parts of the site that exhibit valuable wildlife habitat (for example, any maritime grassland and fixed dunes).
- provide an effective ecological buffer to the Royal Military Canal.
- include the consideration of the position of the site, which lies between two important SPAs at Dungeness and Sandwich Bay; an assessment should be made of the site's function as a stop-off point for SPA bird species. This may necessitate a migratory and wintering bird survey.
- respect the value of the Canal corridor, as a Local Wildlife Site, which has been identified by the Kent Nature Partnership as an ecological asset of county importance, specifically for its rare flora species and its notable populations of odonata.

Unfortunately, these points do not appear to have been taken into consideration and I comment on each point in turn in the paragraphs which follow:

- On site valuable wildlife habitat. The maritime grassland community appears to be almost completely lost in the current proposal. This is very disappointing because this is locally uncommon and appears to represent a significant part of the vegetative value of the site, also supporting the onsite reptile population. It also appears from the report by Lloyd Bore that the presence of landfill on some parts of the site precludes any "fixed dune" habitat. This is short-sighted and needs to be accompanied by evidence of contaminated land studies and detailed habitat survey across the site in order to support this assumption. Presence of breeding and migrating toad routes do not appear to have been taken into consideration in the overall design.
- The current proposals are not accompanied by an effective ecological buffer to the Royal Military Canal and this should not be left to late design stage; this is absolutely crucial to prevent any degradation of the Local Wildlife Site. Indeed, it is concerning that some of the development on outline plans appears to have been brought almost to the edge of the Canal



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(road next to Canoe Club). This buffer needs to be of adequate width throughout (ideally at least 15m) and include detail of appropriate planting of local provenance suitable for the habitat type. This is especially important now that the latest proposals include considerable residential development, which is likely to increase further any recreational impacts on this site of County Importance for nature conservation.

- Full consideration has not been given to the value of the site and the adjacent Local Wildlife Site for migratory and wintering birds. Considering the site position between two SPA's, this is not satisfactory. The Lloyd Bore report has incorrectly scoped out "all other bird species" as "zone of influence only or even of negligible value" (on page 12). Even the breeding bird survey summary is disappointing in that it attaches very little significance to the loss of breeding bird habitat currently present on site through the proposals; loss of schedule 1 breeding cetti's warbler, for example. The results of the breeding bird survey or mapped territories do not appear to have been included in the report and this needs to be provided.
- This site and its adjacent Local Wildlife Site, when you consider its collective, wide use across taxa evident from survey work, represents significant local and county value. It should be more strongly protected by the Local Planning Authority and the current proposals are particularly disappointing considering that Kent Wildlife Trust has been highlighting the value of this site since first proposals in 2012. The current proposal does nothing to reflect the findings of the ecological survey work, which should be used to inform the design of any development and avoid more valuable areas of habitat.

Kent Wildlife Trust **objects** to this planning application until the above issues are addressed. We welcome the opportunity to contribute to the planning process and we look forward to commenting on future stages of development.

Yours faithfully

Vanessa Evans
Planning and Policy Officer