

Medway Council
Pembroke (Compass Centre)
Chatham Maritime
Chatham
Kent
ME4 4YH

Our ref: KT/2006/000047/SD-11/PO1-L01
Your ref:
Date: 09 January 2018

Dear Sir/Madam

Strood Waterfront Development Brief - November 2017 consultation

Thank you for consulting us on the above we have the following comments to make.

Marine Ecology

We had dealt with the flood defence wall replacements earlier in recent planning applications, however Strood Pier was not included in this. The brief talks about Strood Pier and developing this for boat traffic. This pier is not currently a functional structure that could be used for this purpose and as this is a Marine Conservation Zone (MCZ), any proposed works involving this broken down jetty would need considerable impact assessment and might be refused because it would affect a protected habitat. Increased Boat traffic would likely require some dredging, propeller wash would affect Tentacled lagoon worms and construction works would affect the habitats as well. This should be removed from the plan unless you can demonstrate that it is viable and sustainable with regard to the marine designation at this point. We would object to the plan until these changes are made.

Water Quality

In consultation with us, the council will expect that development accords with the objectives of the Water Framework Directive (WFD) to ensure that there is no deterioration in water quality. Strood Riverside is located in a Source Protection Zone 2, which indicates a potential risk from development to sensitive groundwaters and to surface waters. Accordance with the WFD provides a legal framework against which to protect surface and groundwaters using a common management approach and following common objectives, principles and measures. The core objectives are to ensure that any development on the site prevents deterioration to the aquatic ecosystem and to restore polluted surface waters and ground-waters to 'good' status in terms of ecological and chemical parameters."

Any in-river construction taking place will require marine licences, and we will expect to see Water Framework Directive assessments which demonstrate compliance with the objectives of the Water Framework Directive. We would consider the assessments provided and advise the marine regulator(s) Marine Management Organisation (and Peel Ports) accordingly. Guidance on how to conduct a WFD assessment are provided on the website, though further direct discussions will probably be required to define the appropriate levels of evidence at the detailed impact assessment stage.

Environment Agency
Orchard House (Endeavour Park) London Road, Addington, West Malling, ME19 5SH.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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Surface water discharges to water bodies will also need to be compliant with WFD, and should be screened for WFD compliance.

Standalone WFD assessment chapter(s) should be provided rather than having to cross-reference for the multiple WFD receptors within an environmental statement.

Groundwater and Contaminated Land

From a groundwater and contaminated land perspective the commentary within the planning brief relating to the Water Framework Directive, protection of water quality and relevant standards for addressing land contamination issues are welcomed. Advice to developer should ensure that any specific development proposals align with best practice and the National Planning Policy Framework for protecting the environment during development of brownfield sites.

Particular attention should be paid to any additional development landscaping on Watermill Wharf. This public open space was developed with hard landscaping as part of original remediation measures to address significant below ground contamination in a very sensitive setting, any changes would have to have significant additional investigation and assessment to ensure sustainable cost effective changes.

Flood Risk

We have no objections in principle to this development brief. However, as noted within the brief, large parts of the sites are located within flood zone 3, with some areas at significant risk of flooding. Therefore substantial flood defence works and flood mitigation measures will need to be designed and agreed within future planning applications.

The development brief makes reference to current proposed flood defence works (planning application submitted by Medway Council). These works seek to raise land and provide defence to the development sites. We have previously stated that a more joined up approach to flood defence in the area should be proposed. Wider defence works and a continuous defence line through Strood could provide benefit to these development sites as well as existing residential areas and Strood town centre. We are keen to work with the Council to widen the scope of planned defence work, and would be able to advise on where Flood Defence Grant in Aid funding could be claimed.

The Medway Estuary and Swale Strategy is nearing completion and the proposed policy for the Strood river frontage is to raise the current standard of protection and sustain this over the next 100 years to account for sea level rise associated with climate change.

We hope you find our comments useful.

Yours faithfully

Ms Jennifer Wilson
Planning Specialist