



Matter 6 – Strategy for Ebbsfleet and Swanscombe

Issue: Whether the strategy for Ebbsfleet and Swanscombe is justified, effective and consistent with national policy.

- 1.1 We will consider **MIQs 76 to 101** together.
- 1.2 As indicated in our letter dated 13 September 2022, CPRE Kent is part of a group of Charities and NGOs Coalition which supports the Local Plan's protection of the Swanscombe Peninsula Site of Special Scientific Interest (SSSI), where it is within its power.
- 1.3 As set out within our detailed representations at the Regulation 19 stage, we support the modified references to conserving and enhancing the ecological and geological interest of the adjacent Swanscombe Peninsula SSSI.
- 1.4 We are therefore extremely concerned to see that Ebbsfleet Central has been listed as a potential Investment Zone, within the Government's Growth Plan published 23 September 2022.
- 1.5 A key purpose of the Investment Zones is to accelerate growth. Specifically, and as set out within the Government's Growth Plan *"where planning applications are already in flight, they will be streamlined and we will work with sites to understand what specific measures are needed to unlock growth, including disapplying legacy EU red tape where appropriate"*. Guidance published alongside the Growth Plan further sets out the Government's intention to *"reduce lengthy consultation with statutory bodies"* and *"relax key national and local policy requirements"*. Above all, the mandate being given by Government for these Investment Zones is that *"the planning system will **not** stand in the way of investment and development"*.
- 1.6 The Ebbsfleet Central strategic allocation (E4) directly abuts the now confirmed Swanscombe Peninsula SSSI, with the Ebbsfleet Garden City Masterplan previously including land for development that is now within the SSSI designation. Whilst we recognise that the Government's plans are currently in the formative stages, the mere suggestion that the Ebbsfleet Central strategic zone could be a potential Investment Zone causes us great concern for the longer-term integrity of the Swanscombe Peninsula SSSI. It also highlights the threat that will inevitably be faced by the SSSI arising from its close proximity to where such substantial development is being planned for.
- 1.7 The Swanscombe Peninsula SSSI taken as whole creates a green corridor of habitats connecting Ebbsfleet Valley with the southern shore of the River Thames between Dartford and Gravesend. Accordingly, any level of degradation along this corridor would be devastating for the whole SSSI. The loss of or watering down of any existing environmental protections within this area must therefore be resisted by all means possible.

- 1.8 This includes further strengthening the policy protection of the Swanscombe Peninsula SSSI within the Local Plan. This is necessary for soundness to ensure consistency with paragraphs 174 and 175 of the NPPF.
- 1.9 Specifically, and in view of this new threat, we now consider it fundamental that clear buffer zones are created around the SSSI, particularly at points where the proposed allocations (in particular E4, E5 and E6) currently directly abut the SSSI. Whilst we recognise that both the overarching Policy E2 and site allocation Policy E6 do reference such a buffer might be necessary, we don't consider the current policy text to be sufficiently strong, nor clear enough to provide the long-term safeguard commensurate to the SSSI's statutory status and as required by NPPF Paragraph 174 and 175. That is, what constitutes "near" the SSSI boundary as referred to at Policy E2(1)(e)? Likewise, what factors will be considered in establishing whether or not a direct or indirect impact may occur? If a buffer is to be required, exactly what would be needed to achieve the desired ecological functions, while providing landscapes that are visually desirable?
- 1.10 Accordingly, we now consider it necessary to modify the policy text in a manner that clearly states buffers will be necessary, along with the extent of the necessary buffer. We would expect modifications to be necessary to the wording of policies E2, E4, E5 and E6 to achieve this in the most robust manner.
- 1.11 Furthermore, we consider it now necessary for the policy map to be amended in a manner that clearly shows the buffer zone for each of the allocations abutting the SSSI boundary, with diagrams 10, 11, 12 and 13 of the Local Plan amended accordingly.
- 1.12 Alongside this, we would welcome further minor modifications in the form of supporting text setting out the site-specific factors which have informed the extent of this buffer, together with the factors which are to be taken into account so as to ensure there are no direct or indirect impacts on the SSSI (as envisaged by the current wording of Policy E2(1)(e)). In this regard, we consider it may be necessary to refer to supporting evidence base documents such as an updated Green Infrastructure Strategy.