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For the attention of P Howson
Development Control
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Dear Paul

Flood risk management scheme, Hythe Ranges

Thank you for the opportunity to comment on this EIA screening opinion application.

I accept the decisions that lie behind the 'Key Issues' (Table A) and 'Issues Scoped Out' sections of the PEI report and I welcome the following:

- recognition that the potential for harm to shingle ridges is a key environmental risk and that where harm is unavoidable, compensatory habitat management intervention will be necessary within the wider Ranges;
- recognition that further surveys of subtidal areas in the (recommended) MCZ are required to determine the optimum location for the recharge pipeline corridor and the precise positioning of dredger anchorages to avoid habitats that support *Ampelisca* (small crustaceans) tube mats and the unusual community of burrowing megafauna;
- selection (subject to the results of detailed surveys) of an existing lay-down area for the main contractor's compound;
- willingness to investigate measures to reduce the recovery time of the heavily disturbed shingle defensive ridge; and
- recognition of the potential for an increase in suspended sediment to clog feeding and respiratory apparatus of the filter feeding animals in the rMCZ.

Issues that do not appear to have been acknowledged in the PEI report, and which we wish to be assured will be addressed in the final ecological appraisal, include:

- detailed habitat assessment of the main and potential satellite compound areas;
- detailed evaluation of the management options to inform and justify (Environmental Action Plan) measures to avoid/control toxic chemical discharges from the revetment construction works;
- modelling to demonstrate that the discharge of recharge material into the Bay, over the next 25 years, will not alter the physical character of the existing mud seabed (thereby impacting on the burrowing megafauna community).

The Trust is very interested in commenting both on the results of the full ecological appraisal of the impacts (terrestrial and subtidal) and on the assessment of the capacity of the Hythe Ranges to accommodate adequate and suitable compensatory habitat for both the Lydd and the Hythe Ranges schemes. Our principal interests are, of course, captured in the LWS and the recommended MCZ citations.

Finally, Hythe Ranges lies within the project area for the Fifth Continent Romney Marsh Landscape Partnership Scheme. KWT has promoted the scheme and leads the partnership. I would urge the EA's consultancy team, therefore, to engage with Paul Hadaway, Connectivity Programme Manager here at KWT, to ensure that the EA investment at Hythe Ranges complements the wider partnership project.

Yours sincerely,

Keith Nicholson
Planning and Conservation Officer

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