

**Character Appraisal and Management Plan for  
Tonge Conservation Area  
Consultation Draft – October 2020**

**From:**

[REDACTED]

**To:**

Simon Algar  
Conservation and Design Manager  
Swale Borough Council

**November 12th, 2020**

**Constructive Feedback**

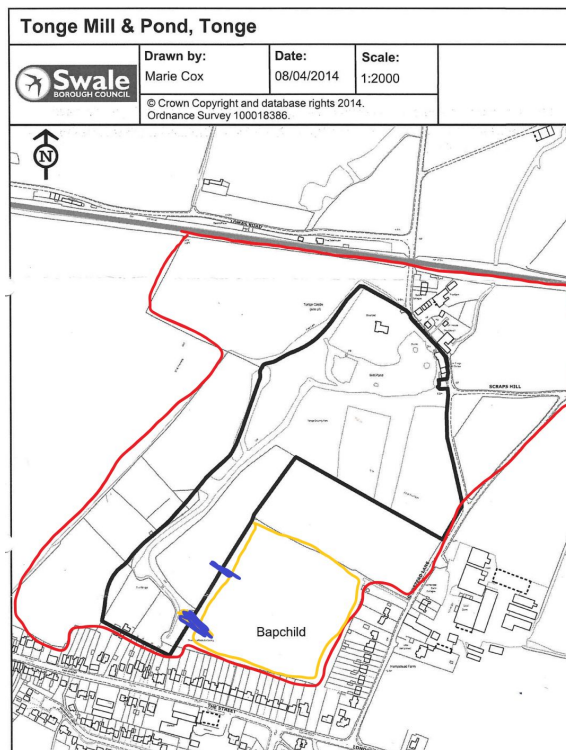
Thank you for sending us the notification on October 5th. We have many points to contribute so please do forgive the relatively informal, point form nature of our feedback.

**1. Wider Community.**

- a. We left a message in late October on the voicemail of Simon Algar, as we have spoken with several neighbours who live on Hempstead Lane and the A2, backing on to the Conservation area who had not received this notification. We do hope they have been able to contribute.

**2. Boundary**

- a. We approve of the new boundary, in fact, when asked about the boundary a few years ago we proposed the attached, which is larger. The proposed extension may be too narrow to protect this conservation area. Here is the drawing that we submitted (a scan of the letter we received is attached).



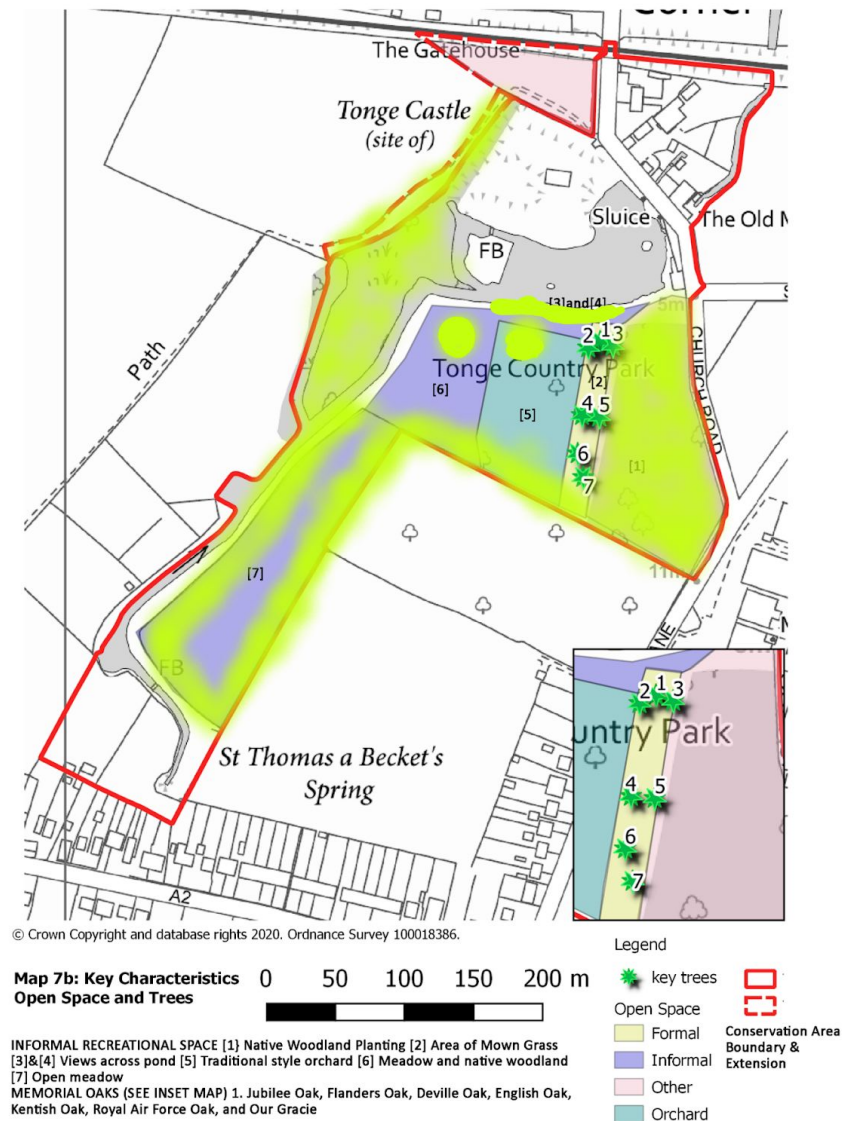
b.

- c. We suggested the red outline.
- d. The orange outline used to be a public space, but a narrow footpath through has been fenced in. There were footpaths around this space with connections into the Country Park where the blue markings are. The larger blue marking was even signposted, as this was the clearest access to the Spring head. This area is now an informal race track and 'burn site' where items as large as static caravans are burned, smouldering for days. Ideally this section of land should be brought back into the Green Space.
- e. Our outline would protect the views highlighted on page 31, 1a and 1b and 1c on page 32.

### 3. Trees

- a. In the report, on the 4th page there is a pop-out which highlights what is protected in a conservation area. The third point is:
  - i. • Special provision is made to protect trees.
- b. Although on page 21 there is further reference that the 'community woodland is forming a new landscape feature' the map on page 24 only appears to be designating 7 trees as important. We have identified several groups of trees that are all critically important to the landscape. They are all highlighted below in lime green on an altered map. The vast majority of these have a diameter of more than 7.5cm which means they are also under TPOs. Equally, as these trees frame the entire space, they create all kinds of pathways for small mammals, and ensure that the park provides a true feeling of 'being in nature' which footpaths and other small public spaces don't provide.
- c. The planting is also incredibly diverse and a true legacy, among others there are beech, walnut, willow, chestnut, oak, elder, damson, pear, quince, ash, elm, and hazel. We have been told that the particularly tall Elm on the Tonge

Castle site are rare and impervious to Dutch Elm disease. They are taller than the chimney, and equally important to the landscape.



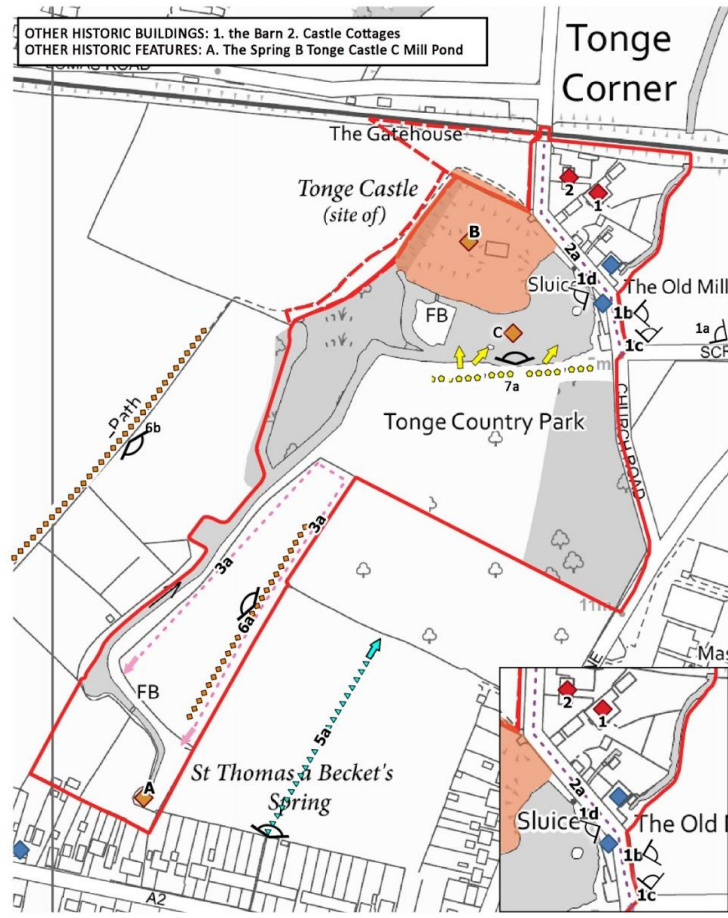
#### 4. Biodiversity

- a. It was great to see the references to biodiversity in the report, like this on page 21:
  - i. In general the ecological integrity of the area is moderate. Orchards and associated boundary trees, the railway embankment and spring fed valleys are all important for biodiversity.
- b. This is a non-exhaustive list of the flora and fauna which make its home in the conservation area:
  - i. Water voles - there are at least two families living on the water edge, we invited the Kent Wildlife Trust to the Mill to verify the droppings. We have protected this habitat by maintaining the reeds in front of the mill and ensuring the bank had lots of places to burrow. This is a protected species.

- ii. Birds - mallards, coots, moorhens, a pair of nesting herons, kingfisher, ganets, gulls, little owls, kites, buzzards and occasionally swans.
- iii. Small mammals - hedgehogs (also a protected species), fox, mole, and squirrels.
- iv. Bats
- v. Orchard - there are at least 20 different varieties of apple tree

**5. Dynamic Views**

- a. The Dynamic Views Map on page 23 shows a few views that we would like to highlight



- b.
- c. The 6a view has a slight conflict now that the attenuation pond is being built at the Stone's farm development. One of the drains appears to be unnaturally raised and now really impedes that view. We took this photo:



d.

## 6. Public Access

- a. On page 22 we find this reference “The land on the southern side of the pond has, by tradition, been accessible to the public for informal recreation such as picnicking and feeding the ducks... The public access afforded to the area contributes to its appeal as a local amenity, although this is informal in nature”. Ideally this should be formalised.
  - i. We have also found this note on the Swale website:  
<https://services.swale.gov.uk/meetings/mglIssueHistoryHome.aspx?Ild=9151&Opt=0>
  - ii. We would be happy to discuss our concerns further with Councillor Mike Baldock
- b. Hundreds of people enjoy the space each week and the local community has been involved in several formal and informal litter picks to keep it clean. One neighbour has also repaired one of the benches offering view 7a. There are simply not enough parks in Sittingbourne and this is possibly the best example.
- c. Never has the park been more important than in the time of lockdown, and we have seen a sustained increase in people enjoying the space for both physical and possibly more importantly mental health. There are many studies to support the link between nature and mental health, this one is particularly interesting:
  - i. <https://www.nhs.uk/news/mental-health/green-exercise-and-mental-health/>
- d. Most of the referenced aspects of this conservation area and the views associated with the conservation area, the panoramas, fixed views and dynamic views would be lost if this space were lost.
- e. For the last few months all pedestrian access through the former car park has been blocked by a new fence. This is the safest entrance to the park and now it is gone. Several regular visitors have complained about this to us, at least one of whom is disabled, and is no longer able to access the park.

## 7. The Narrow Road

- a. On page 29 the report refers to the “narrowed bend into Church Road as it squeezes between the two buildings; the resulting pinch-point is an attractive and defining feature of the place”
- b. We would love to see a speed restriction here. Currently it is a national speed limit road, and people do seem to want to push that boundary. If the buildings are to remain in the long-term then a speed restriction is a necessity..

**8. Section 3.0, Management Strategy**

- a. The pop-out on page 39 labeled Forces for Change, highlights the risks to the area, but does not propose solutions.
  - i. Uncertain future of the area currently used for informal recreation
  - ii. Pressure from commuter traffic and large vehicles using the Conservation Areas as a cut through
  - iii. Development on the western side of the Conservation Area
- b. We propose solutions for these issues (in order):
  - i. Formalise a permanent park as per the note on protecting the park found on the Swale website:  
<https://services.swale.gov.uk/meetings/mglIssueHistoryHome.aspx?Ild=9151&Opt=0>
  - ii. Introduce a speed restriction
  - iii. Lower the drain and ensure tree planting to maintain a natural tree boundary to prevent the visual incursion of the Stone’s Farm development
- c. We agree with all the suggestions made on pages 41-45.
  - i. Our main reason for writing was to draw particular attention to the flora and fauna and biodiversity of the site. We know that the report did not look at rare or protected species but these are incredible assets.

We are happy to discuss further. You can contact me at any time.

Yours Sincerely,



